



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Andrew Thompson
Cherwell District Council
Bodicote House, Bodicote
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7 March 2023

Dear Mr Thompson

Re 24/00245/OUT Residential development of 99 dwellings, South Lodge, Fringford Road, Caversfield

CPRE strongly objects to this speculative development which is beyond the built limits of the settlement of Caversfield, is not satisfying an identified need and the proposed development site is neither in the currently approved Cherwell District development or emerging plans. The proposed development is inconsistent with the overarching strategy of the existing current local plan which is to locate developments in urban centres or in larger villages and to protect smaller villages such as Caversfield from overdevelopment.

The many eloquent responses to the planning application from the public have rightly questioned whether the basis of the Planning Inspector's decision in 2014 to dismiss the appeal for the development of 200 homes is still not relevant to the Applicant's proposal for 99 houses. The reasons for refusal of the development then are just as valid now namely lack of new facilities or local services, the loss of an existing sports use, the design of the development with a single point of access and the harm to the landscape and setting of the listed buildings. This is reinforced by Cherwell District Council being able to demonstrate a supply of deliverable housing sites, therefore policies in the local plan that relate to housing supply such as saved policy H18, New dwellings in the countryside and Village 1, Village Categorisation are now relevant to any decision, which was not the case in 2014.

Community Involvement pre-application

The Applicant's Statement of Community Involvement mentions a meeting being held with the local Parish Council but provides limited information beyond this. CPRE's experience from other applications is that there is considerable merit for both the developer and affected stakeholders engaging fully at the pre-application stage. A developer can get a feeling for potential concerns such as design, access, highway issues and flooding which can inform their planning application positively. CPRE is not aware that any open meetings with the public or that any exhibitions/roadshows showcasing the development were held prior to submission of the application.

CPRE is not aware that any leafleting took place alerting neighbouring premises of a potential development. The minimal community involvement pre-application undertaken by the Applicant is perhaps why there was a



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full attendance from the public at the recent parish council meeting held to discuss this application and the numbers of responses that this application has attracted from members of the public.

Adequate Housing Supply

CPRE's believes that the Local Planning Authority (LPA) has demonstrated that its development plan is up to date. The current local plan covers the period to 2031 and an emerging plan is currently being developed and consulted on. CPRE believes that with regards to housing the LPA can demonstrate that it has sufficient deliverable housing sites and therefore policies within the local plan relating to housing supply must be considered to be up to date in line with the 2023 National Planning Policy Framework (NPPF) para 11c. We therefore do not accept that the Applicant's contention in their Planning Statement that local policies, as they relate to housing, are out of date and that this planning application should be evaluated against these policies.

Saved policy H18 limits housing development in the open countryside. It is acknowledged by the Applicant in their planning statement (para 2.9) that the development site would sit within the open countryside and is therefore contrary to H18. Additionally local policy Village 1, which does not appear to have been listed as a relevant policy within the Applicant's Planning Statement, categorises Caversfield as a category C village which is regarded as the least able to support residential development. Since this limits development in category C village to infilling and conversions, this development would be contrary to this policy.

CPRE recognises that this development incorporates a proportion of affordable housing. The Applicant state in their planning application that affordable houses will comprise 35% of the total houses proposed for the site and it is stated that this is an improvement on the previous application for the site (para 2.21 of their Planning Statement). CPRE challenges whether this is the case as para 39 of the Planning Inspector's 2014 Appeal Report stated that affordable housing was being offered at 35% by the previous applicant. Whilst the Applicant states that they are offering 35% affordable housing, the Design and Access Statement shows an offer of 30% which is inconsistent with the Applicant's Planning Statement and lower than the previous application for this site.

Coalescence

CPRE contends that this development, if approved, will take away a key buffer that separates Caversfield from Bicester as the development will abut the Bicester Eco town. This is contrary to the existing local plan which seeks to avoid the coalescence of towns and villages. Para B174 of the Local Plan reiterates this further by stating that there should not be coalescence between areas of strategic development and neighbouring villages. This is consistent with saved policy C15 Prevention and Coalescence of Settlements.

Local Landscape Protection

The Planning Inspector's report concluded that the previous application, if it had been approved, would have harmed the landscape character of the area. It is CPRE's view that the current application will likewise harm the landscape character of the area and therefore it runs counter to local plan ESD13, Local Landscape Protection and Enhancement and saved policy C8, Sporadic development in the open countryside.

CPRE would contend that developing of this site for residential development is at odds with the principles of the development of the eco town development as espoused in the Local Plan which was to develop that site away from the open countryside and more towards Bicester town. Therefore developing this site on the other side of the B4100, into the open countryside, appears incongruous with this objective.



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CPRE contends that development on this site would be inconsistent with local character and is an area of high tranquility. There is strong historical military connection running through the village linking Caversfield House, St Laurence Church, service personnel housing in Caversfield and the airfield at Bicester Heritage. Allowing a modern housing development at the proposed site would be incongruous with this historical connection and will fundamentally change the character of village. The proposed development site's dark skies would be impacted by street lighting with a commensurate impact on the site's wildlife. The estimated influx of 200 motor vehicles to the development along with street lighting and the creation of a cycle route to the side of the access road would lead to an inevitable urbanisation of the site.

Conservation of the Historic Environment

Local Plan Policy ESD 15 The Character of the Built and Historic Environment states that 'new development will be expected to complement and enhance the character of its context through sensitive siting, layout and high quality design'. ESD 15 also states that new development should 'conserve, sustain and enhance designated and non designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings'. A reason for refusal of the previous development from the Planning Inspector was that the development would cause harm to the setting of the group of historic buildings.

Since the proposed layout will cover the expanse of the site, CPRE does not believe that the Applicant's proposal sufficiently addresses the concerns with regard to the setting of the development and contends that the Applicant's proposal is little different from the one that was refused in 2014. As the Planning Inspector stated in his report, 'the farmland appearance of much of the appeal site, and the similar role of the area closest to the house in particular, makes a substantial contribution to their combined significance as a heritage asset'.

Proximity to Services

CPRE does not believe that the proposed development is well positioned to services and facilities. Caversfield is one of Cherwell's least sustainable villages with no shops. Local Plan Policy ESD1, Mitigating and Adapting to Climate Change requires developments to be on sites where there is a reduced need to travel and in particular reduced dependence on cars.

Tables 1 and 2 in the Applicant's travel plan make for sobering reading. Taken as read, the Applicant's measure of distances from the development site shows that the majority of facilities and services fall outside what would be viewed as acceptable walking distances. The Institute of Highways and Transportation (IHT) in their guidance suggest that 810m is the furthest distance that people would be expected to walk for a bus. As per para 3.26 of the Applicant's Travel Plan the nearest bus stop to the site is 950m.

The walking distance to the nearest secondary school at 2.25km is above the maximum recommended distance of 2km. The distance to Bicester town centre far exceeds the recommended levels in table 1. The Applicant, in their Design and Access statement appears to show the nearest GP practice at Bure Park which has been closed for some time. The nearest GP Practice is likely to be Victoria House Surgery which is in excess of the recommended 2km distance for walking.

CPRE does not believe that the site is well served by bus services. There are just two routes stopping at Caversfield and we believe that one of these is subsidised and not guaranteed to run in the future. Furthermore bus service 500, that operates from Banbury to Bicester via Brackley, does not run in Bicester on Sundays contrary to the impression given by the Applicant in table 3.



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The nearest train station to the site that operates a service to Banbury is Bicester North, which is estimated by the Applicant to be 2.4km away from the site, or a 27 minute walk away. The IHT guidance referred to above suggested that the maximum distance to a railway station should be no more than a 1.610km walk

Biodiversity Net Gain

The Applicant's biodiversity development's net gain assessment shows a circa 10% gain in non linear habitat which is in line with Cherwell's District requirement. CPRE is disappointed that the Applicant did not share a full copy of the biodiversity metric spreadsheet with consultees as a matter of course. Presumably this will not be available to the Cherwell District Council Planning Committee. The gain in non linear habitat post development is at the minimum requirement of 10% with little margin for error therefore evaluating the assumptions behind the scoring would have given some assurance to consultees and the Planning Committee as to the deliverability of the Applicant's biodiversity offering. CPRE assumes that the gain shown will not be in perpetuity although the loss of open countryside will be permanent.

The Design and Access statement mentions creation of a wildflower meadow. This will be difficult to develop quickly from arable land where the soil contains different nutrients. The creation of a wildflower meadow will require extensive management in the early years therefore a robust management plan will be essential if it is to be delivered successfully.

Other Issues

The Applicant's analysis of composition of land indicates that the site is grade 3b which is moderate quality agricultural land. Given the national pressing need to maximise food security CPRE considers that even land classed as moderate should not be readily dismissed as it still has crop yielding potential.

CPRE believes that the land has been used at various times for equestrian use and had planning use for this as such and therefore this should be retained. Bicester continues to be short of sporting facilities and para 103 of the 2023 NPPF states that existing sports land should not be built on.

The Applicant states that the site is at low risk of flooding and is located in a flood risk 1 (low risk) area. Some concerns have been expressed in public responses to the consultation that the raising of the area of the site may increase the flood risk to existing residents. A question has been raised as to whether all of the tests were undertaken as one of the bore halls was full of water at the time of testing. Some of the concerns and issues on this could have been addressed by the Applicant prior to submission if a fuller consultation process had been undertaken.

Conclusion

CPRE strongly objects to this housing development proposal. The proposed development is not an allocated development in the local plan and was subject to a previous application which was ultimately refused at planning appeal. CPRE believes that the reasons for refusal are as relevant now as they were then.

The development does not appear to be meeting an existing need within the village nor is it required to meet any housing supply shortfall in Cherwell as the Council has announced that it now has sufficient deliverable housing sites. As per Local Plan Policy Village 1, Caversfield is a category C village which limits new dwellings to infilling and conversions and not of the magnitude of development proposed by the Applicant. The development site is not well located to facilities and services and most journeys are likely to be taken by motor car as distances fall outside of a reasonable walking distance. Development on this site which is located in



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the open countryside is contrary to the aims of both the current and emerging plans which is to centre development around the main urban centres. CPRE requests that this application is refused.

Yours sincerely

Nick Dolden

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CPRE, Cherwell District

Copy to: Helen Marshall, CPRE Director