Maria Philpott,

Senior Planning Officer, Cherwell District Council.

October 15th 2018

Dear Maria,

**Re: Application 18/01253/F Hotel at Bicester Heritage/Bicester Airfield**

I am writing to strongly object to the application for a hotel on this site. Despite the applicant’s claims to the contrary, it is clear that the application will result in net loss to biodiversity and a severe negative effect on the ecology and importance of the Bicester Airfield Local Wildlife Site (LWS). It is therefore not compliant with CDC Policy ESD10 nor the NPPF sections referring to biodiversity.

The submitted reports from Ecology Solutions downplay the ecological interest of the site, but the technical detail within the reports does not support their assessments. This technical detail documents the presence of grassland that is of significant value, and which fully merits its LWS designation. The grassland is variously described as MG5 or CG3 in the ecology report. Both these types of grassland are representations of Priority Habitats under the NERC Act 2006 (Lowland Meadow or Lowland Calcareous Grassland, respectively). Their loss requires full compensation if, net loss is to be avoided, Policy ESD 10 is to be complied with, and the NPPF tests as regards acceptable impact on biodiversity is to be met.

 The obligation to adhere to this legislation cannot be avoided. The suggestion that the grassland has no future because it is mown is an ecologically flawed argument as in many cases regular mowing is what protects the remaining fragments of these rare types of grassland from decline in situations where livestock grazing does not occur. The presence of plant species in the application site such as eyebright and basil thyme merely underlines this: these are rare species in Cherwell District.

The attached report from Alison Smith of the University of Oxford's Environmental Change Institute who has allowed me to convey her report to you, is based on data from the Thames Valley Environmental Records Centre (TVERC) and also contains her original research. It points out that TVERC classifies the ecology of the application site as calcareous grassland which is extremely rare across Oxfordshire, with only 0.3% remaining in the County. This is a Section 41 habitat under the NERC Act, 2006 i.e. a Priority Habitat and should be protected. The report also sets out the important function of the block of special grassland in the application site to the survival of the other remaining fragments in Cherwell District. I commend this report to you as an accurate and independent assessment.

I further criticise the ecologists’ report as they have not surveyed for invertebrates (para B237 of the Local Plan requests surveys for brown hairstreak butterflies) or reptiles, despite the presence of some suitable habitat. Indeed they talk of moving reptiles and yet have not submitted details of a receptor site or a suitable method for moving them.

The measures for biodiversity enhancement of the remaining habitat as suggested by Ecology Solutions, will not provide sufficient mitigation or compensation to meet the requirements of ESD10 or to avoid significant loss as per NPPF para 175. The hotel will have a significant negative effect on the LWS and a significant negative effect on Priority habitats that are rare in Cherwell District and which the Council is under a statutory duty to conserve.

Paul Evans, the Council's ecologist, in his separate reports for the hotel and a new technical site (18/01333/F), suggests that a masterplan for the Bicester Heritage land is drawn up to prevent sequential and piecemeal applications eating away at the important Bicester Airfield LWS and to allow a management plan to preserve and enhance the LWS. The proposals do nothing towards this objective. I would endorse Paul Evans’ suggestions as further developments are planned. For instance, the Bicester Heritage website refers to construction of luxury motor lodges around a private recreational driver’s circuit.

In addition to the intrinsic nature conservation interest of the site and the conflict with ESD10 and the NPPF, I would draw attention to the following:

* Bicester is already short of natural green space and only has Bure Park Nature Reserve and Gavray Meadows LWS as designated areas within the town’s ring-road. The nearest LWS to the town outside of the ring road is Bicester Airfield LWS and the hotel application site covers an important section of this. Bicester cannot afford to lose more of this type of green space. By protecting the LWS, the owners could provide even more for their visitors to enjoy.
* The proposed development is a fairly tall building and if the suggested developments around the peritrack do go ahead as well as the proposed extension of the technical site, the airfield may become unusable for aeroplanes and gliders to take off and land safely. There is a danger that future development focused on the motor vehicle alone will detract from the historic function of the airfield as a major player in Britain's defence.

For these reasons, I request that the application is refused.

Yours Sincerely,

Pamela Roberts

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