

BBOWT
The Lodge
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FAO: Mr Andrew Lewis
Cherwell District Council
Andrew.Lewis@Cherwell-DC.gov.uk

By email only

4th June 2020

Dear Andrew,

Location: Heyford Park Camp Road Upper Heyford Bicester OX25 5HD

Application Reference: 18/00825/HYBRID

Proposal:

Demolition of buildings and structures as listed in Schedule 1; Outline planning permission for up to 1,175 new dwellings (Class C3); 60 close care dwellings (Class C2/C3); 929 m2 of retail (Class A1); 670 m2 comprising a new medical centre (Class D1); 35,175 m2 of new employment buildings, (comprising up to 6,330 m2 Class B1a, 13,635 m2 B1b/c, 9,250 m2 Class B2, and 5,960 m2 B8); 2.4 ha site for a new school (Class D1); 925 m2 of community use buildings (Class D2); and 515 m2 of indoor sports, if provided on-site (Class D2); 30m in height observation tower with zip-wire with ancillary visitor facilities of up to 100 m2 (Class D1/A1/A3); 1,000 m2 energy facility/infrastructure with a stack height of up to 24m (sui generis); 2,520 m2 additional education facilities (buildings and associated external infrastructure) at Buildings 73, 74 and 583 for education use (Class D1); creation of areas of Open Space, Sports Facilities, Public Park and other green infrastructure; Change of Use of the following buildings and areas: Buildings 357 and 370 for office use (Class B1a); Buildings 3036, 3037, 3038, 3039, 3040, 3041, and 3042 for employment use (Class B1b/c, B2, B8); Buildings 217, 3102, 3136, 3052, 3053, 3054, and 3055 for employment use (Class B8); Buildings 2010, 3008, and 3009 for filming and heritage activities (Sui Generis/Class D1); Buildings 2004, 2005 and 2006 for education use (Class D1); Buildings 366, 391, 1368, 1443, 2007, 2008 and 2009 (Class D1/D2 with ancillary A1-A5 use); Building 340 (Class D1, D2, A3); 20.3ha of hardstanding for car processing (Sui Generis); and 76.6ha for filming activities (Sui Generis); the continuation of use of areas, buildings and structures already benefiting from previous planning permissions, as specified in Schedule 2; associated infrastructure works including surface water attenuation provision and upgrading Chilgrove Drive and the junction with Camp Road.

Thank you for consulting BBOWT on the further information provided for this application. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of the local ecology on and around the application site.

We welcome the submission of additional information. We have checked this as best as we can against the BBOWT response of 4th July 2018. With the exception of the matters we cover below we do not consider that the amendments have satisfied the concerns we raised in our July 2018 response (we are aware you will have it but do get in touch for a copy if you need it). We therefore maintain our objection.

Please refer to our July 2018 response which still stands in all matters except as follows:

Net gain in biodiversity (objection still stands but amended as follows)

We welcome the change to what is described in the update to the ecology strategy as a more realistic and achievable condition score for the unimproved calcareous grassland creation – from Good to Moderate. However even with the point made in the update to ecology strategy document in relation to the habitat actually having 15 years to be created rather than the 10 indicated in the metric we are still concerned with respect to Time to Target Condition (TtTC). For the creation of unimproved lowland calcareous grassland even of moderate condition the DEFRA metric 2.0, if we have interpreted it correctly, suggests 20 years. So we would suggest either a change in this figure or further details on why the creation to moderate condition can be achieved in 15 years.

We also welcome the additional habitat creation proposed. The metric in its current state shows a net gain of about 11 units. However this is in the context of a site with over 1900 units baseline. So this would appear to be a net gain of just over 0.5%. We understand that Cherwell DC are now seeking 10% net gain in biodiversity (<https://www.cherwell.gov.uk/news/article/624/council-ramps-up-biodiversity-target>) and the national trend (e.g. via the Environment Bill) proposes a national system with 10% minimum as far as we understand. So at least a 10% net gain would seem to be a minimum aspiration. But perhaps more importantly than that still this is a site with very high wildlife value and the development will involve very significant impact. The Oxfordshire Cotswolds Garden Village Area Action Plan Preferred Options Paper (<https://www.westoxon.gov.uk/media/nazn42gz/garden-village-app-preferred-option-paper-july-2019.pdf>) proposes a 25% net gain. Bearing all the above in mind a net gain of at least 10%, and we would suggest more in the region of towards 20%, would seem more appropriate and it is currently not achieving that.

Conclusion

We also just want to mention that the net gain issue, although a significant one, is not our most serious concern in relation to this development. Those more serious concerns were set out in our July 2018 response and relate to a number of aspects including (but this list does not cover all the concerns) loss of part of a LWS/loss of priority habitat, potential impact on breeding birds, particularly curlew, and more general recreational and other impacts on

existing habitats and species. For more details on these and other concerns which we do not consider to have been addressed please see our July 2018 response.

I hope that these comments are helpful. Should you wish to discuss anything further, please do not hesitate to get in touch.

Yours sincerely,

Neil Rowntree

Senior Biodiversity & Planning Officer (Oxfordshire)