

## Response to the Cherwell Draft Local Plan 2040

In response to the Draft Cherwell Local Plan, I would submit that insufficient consideration has been given to the proposals for the Bicester area and in particular the continuing proposals to develop the area known as 'North-West' Bicester or how that is to be achieved without causing the destruction of nearby villages and farmland.

### The levels of housing required as part of the Cherwell Plan 2040

The present draft Local Plan fails to take any consideration of the development that has already occurred in and around Bicester and / the other developments which have now gained planning permission or are in the process of being developed and which were never contemplated let alone included in the original 2013 Cherwell Plan and are still not taken into consideration when calculating the remaining houses needs of the area:

- a) In particular, the original housing requirements which were used to calculate the need for development of Bicester were based on a formula which the Local Council themselves have now rejected. Cherwell DC now recognise that the Government's 'standard method' is the appropriate calculation to adopt for assessing housing need, which in itself produces a 'need' that is 35 per cent lower than the current local plan. Yet this is not then properly represented in the new draft Local Plan 2040 which maintains the same assumptions and incorrect calculations used for the 2012 Adopted Plan.
- b) However, in addition, the Office for National Statistics (ONS) indicates that Cherwell District Council's future housing need will be for 14,840 new properties over the next 20 years. Yet Cherwell District Council's application of the statistics leads to it proposing 25,860 new properties in the plan over the next 16 years. An over-calculation of some 57% on what the national expert statisticians have calculated. The calculation used in this draft local plan is simply wrong and should be properly re-calculated using the ONS formula. A large proportion (and disproportionate amount) of this future miscalculated planned development is one area: North -West Bicester. The new local plan 2040 needs correct this error and to recognise that the figure for required development upon which it is based is inaccurate and that the plan needs to be changed to reflect the correct ONS calculation for development requirement.
- c) Further the figures for the provision of property to that ONS corrected figure and Bicester's share of that corrected figure, then needs to reflect the houses which have already been provided in excess of what was catered for in the original 2012 adopted Local Plan and which have never been taken into consideration when making that plan and in turn this amended version, which is based on the same plans and figures. For example, 1,900 houses have now been developed or have planning permission at Graven Hill in South-East Bicester which were never contemplated in the 2012 adopted Cherwell Local Plan, which had worked on the assumption that the Ministry of Defence would never sell such land and which in turn should come off the figure for property provided.
- d) But additionally, no consideration has seemingly been given in this draft Local Plan, to reflecting any remaining housing need or Bicester's share of it, by developing the further mass of land that is available at the South-East Bicester site, which is a site suited for development, being close to the motorway, without having to traverse Bicester itself and

which is close to the vital water and sewage utilities, unlike any further development in the North-West of Bicester.

I don't advocate that the 2040 Local Plan should entirely eliminate some future development on the North-West Bicester site (or more accurately the proposed area called "Hawkwell"), but given the infrastructure difficulties with developing North-West Bicester, the Local Plan should properly take the opportunity to recognise those difficulties and scale back the extent of development allowed on this site, including moving the boundaries further away from the village of Bucknell, which on the present draft plan, risks the coalescence of the historic village of Bucknell with Bicester and is not appropriately addressed in the proposed draft Local Plan 2040.

What needs to be given proper consideration in the further Local Plan is the sharing of the increase in housing development more evenly and equitably across the Cherwell region and not simply to propose a vast development in one area of Bicester which has no infrastructure to be able to cope with the vast proposed development and which will involve the wholesale destruction of farm land and wildlife, key features which should be protected and which is still being given insufficient recognition in the proposed draft plans, despite the express suggestions of the District Council oversight committee.

#### Brownfield Sites to be properly re-assessed to meet the development needs

Following on from the policy suggested by the oversight committee, requires the authors of the Local Plan to give proper consideration and re-evaluation of the many Brownfield sites within the Cherwell area to be undertaken as part of this Local Plan in order to ensure that such land is being properly developed and maximised to meet the future housing needs, before the Council then turns its attention to Greenfield sites or Farmland. As an example, no consideration has been given by this draft plan to the use of the rest of the MOD and Ministry land in and around Graven Hill, logically linking the Graven Hill development to the Motorway South of Junction 9 (and in future allowing development of a direct link to the motorway by a new Junction 8A of Bicester South), this vast area of land can be properly used to meet the Bicester part of the future housing requirements, without the difficulties of lack of infrastructure which North-West Bicester suffers from and which has easy access to the transport hubs of the motorway, park and ride / bus provision and the train stations which are all within easy access of any development on this part of Bicester.

Additionally, no consideration has even been given by this plan to further maximising spare 'brownfield' land at Upper Heyford and it is notable that the developers of Upper Heyford have started their own campaign to be able to use this land for redevelopment. It would seem incredible that the authors of this draft Local Plan have simply failed to consult developers and others who own suitable brownfield sites, which can meet a considerable amount of the Cherwell housing requirements up to 2040, before insisting or presenting the destruction of Farmland and greenfield sites. Considerable further consideration and efforts should be made and reflected in the Local Plan policy to encourage development of identified Brownfield sites.

#### Proposals of the Draft Local Plan regarding the further development of the 'North-West Bicester site

The draft Local Plan, simply suggests that the North-West Bicester site should be increased to take a further 1000 properties on top of the 7,000 already proposed in the Adopted 2012 Local Plan. However, the areas of Himley, Elmsbrook and Firethorn have all been fully developed or have plans

to fully develop their sites granted. As such this proposal could only be aimed at trying to put a further 1000 dwellings on exactly the same sized land as the proposed Hawkwell site.

This Draft Local Plan fails to take into account, that the present proposed 2,600 houses that were envisaged for this site in the 2012 ALP can not be sustained without a massive investment in traffic infrastructure and other infrastructure, which would in any event be incapable of dealing with the vast increase in traffic from the other surrounding projects which were not envisaged at the time that the 2012 Local Plan was being consulted upon and developed. For example, there has since 2012 been planning applied for and/or granted for a large leisure complex and associated increase in traffic at "Great Wolf" in the neighbouring Chesterton and a mass of development at sites in Caversfield and up to Baynards Green, all feeding onto the same Bicester ring road.

The 2012 Local Plan was itself predicated on the idea of the Howes Lane re-alignment having been provided and funded by Oxfordshire CC. That at the present time has no target date for when any such funding and completion could occur (at the earliest in would be late 2030's). But in any event, even if that were ever to come to fruition, it would be hopelessly inadequate to cater for the mass of traffic which has since increased throughout Bicester since the 2012 plan, including that created by further development of Bicester village and the surrounding area.

Proper thought and re-consideration needs to urgently be given in this Draft Local Plan to the development of North-West Bicester and the proposed Hawkwell site and the number of proposed houses on this site considerably reduced; not increased.

No rationale or basis has been provided for why it is believed that a 1000 extra properties could fit on the North-West Bicester site or their effect on the present crumbling infrastructure of the area or surrounding communities including Elmsbrook, Bucknell, Bure Park, Caversfield and beyond.

#### Green Buffer between North-West Bicester and Bucknell

Whilst the draft Local Plan belatedly recognises the oversight committees' recommendation for the provision of a 'green belt' or 'green buffer' between large developments (such as Bicester) and existing communities (such as Bucknell village), however, unfortunately the present draft plan provides only 'lip-service' at best to the concept.

The Proposed 'green buffer' for the North-West Bicester development simply follows that proposed by the developers of the site (Hallam Land Management) following precisely the lines of their proposed development in their Planning Application, without any divergence or seemingly thought given to what a Green Buffer requires or whether this proposal remotely achieves the aim of providing a proper and meaningful buffer between urban sprawl and the Countryside.

The Local Plan should be considerably more proactive than simply following developer's ideas.

In order to be a proper Green buffer this proposed area should be considerably larger in width (i.e. providing wider separation between the boundaries of Bicester and the boundaries of the historic village of Bucknell). Calculations based on this proposed green buffer show that far from protecting the village of Bucknell, would in fact (on the present suggested draft plan) would allow developers to move houses much closer to the village of Bucknell than the boundaries on the 2012 Adopted Local Plan without a green buffer. On the present draft local plan the nearest house on the site of Hawkwell to an existing dwelling in Bucknell would be reduced from 721 meters to just 470 meters a reduction in "buffer" of some 35% and because there is no Green Buffer proposed for the West side of the Bicester-Bucknell road, the proposed distance from part of the development (proposed by Hallam to be burial grounds) would be reduced from a distance of 504 meters to the nearest existing

dwelling to only 297 meters, a reduction of 57% on this new proposed plan compared to the Adopted 2012 Local Plan.

As such far from acting as any kind of green buffer, if the present draft were to be passed in its present form, the 'buffer' between Bucknell village and Bicester developments would dramatically reduce to the width of a small field or a running track away!

But additionally, in order for any green buffer to actually function as a proper "green" "buffer", separating an existing historic village from new urban town development and to prevent coalescence, it needs to be considerably more carefully considered and needs to contain and reflect a number of minimum requirements, not presently covered or addressed in the draft plan:

- a) Firstly, it needs to be consistent and uniformed in shape covering the whole of the village and the proposed development. At present it simply follows a hedge row and path in straight lines, yet the village it seeks to protect curves around in an 'L' shape towards the development, the proposed buffer makes no account of this (meaning that parts of the village are even closer to the development than others), nor inexplicably does it cover land on the other side of the Bicester-Bucknell road (the land on the West side of the proposed development), which should also be covered by a proportionate green buffer. Further, at points to the east of the development, the buffer zone inexplicably has a break in its coverage. Nor importantly does it cover land north of the draft plans proposed buffer zone and the houses in Bucknell itself. Any buffer (to be a proper green belt, should extend up to the houses of the village to prevent any future development / in infill development occurring in the fields north of the proposed green buffer.

#### Common Land / Proper Environmental consideration

- b) Indeed, if the authors of the Draft local plan did have communities and the environment as one of their considerations, they would suggest that any developer of North-West Bicester, provide the 3 fields (housing the historic walled garden) and abutting the houses on the South-East and Eastern sides of Bucknell village and being inside the gap between the present proposed green buffer and the houses of Bucknell; to the village to be turned into and run as 'common land' for the benefit of the entire community and nature (these fields are presently owned by the same landowner who owns the land being acquired by developers of Hawkwell).
- c) In addition, and vitally, the Green buffer should be a proper 'buffer', which would require the plantation of trees to form a wild wood/forest, which will help cut out light and noise pollution from the development of North-West Bicester and help off-set some of the environmental damage being caused by these developments. The present draft is silent on the form of buffer but should not involve some kind of "managed" green space, which effectively brings the developments footpaths, lights, and managed play areas /sports field etc into the parish of Bucknell and provides absolutely no environmental benefit and no actual 'buffer'.
- d) Further, the new Local Plan needs to be robust in protecting the concepts of 40% of any development being green space and not allow developers to try and use the 'green buffer zone' to be used as part of their provision of 40% green space within the development. As presently drafted, the Local Plan is simply not sufficiently robust to ensure that a proper

green buffer is provided, let alone one which could work, and does nothing to ensure that the concept is not simply used by the developers to off-set their required Green-space provisions.

- e) The Draft Plan needs to robustly ensure that in addition to the green buffer, that the development of Hawkwell area ensures that the provision of a green space and green corridor within the existing Bicester Town boundary area remains (as per the 2013 Local Plan) abutting the Green Buffer zone at the North-West end of the development and ensuring that there is proper separation between the town and the Countryside and not simply remove this further green area of separation because there is a supposed green buffer zone. Or put simply, on the existing Local Plan developers are prevented from developing houses up on the existing Bicester Town Council boundary with Bucknell Parish boundary, but instead there was an internal green zone within the development ensuring development of houses was only to the south of the site and therefore further away from Bucknell. This is not properly or robustly set out in the proposed draft 2040 plan.

#### The Provision of burial grounds

The Draft local plan fails to deal on the North-West Bicester plan with the present proposals for burial lands. Such provision needs to be only within the boundaries of Bicester and not within the parish boundaries of Bucknell and needs to be robustly re-aligned in the future local plan, away from the boundaries of Bucknell Parish and away from the Bucknell-Bicester road and the increased traffic it would attract. The draft plan does nothing to address this.

#### Ensuring that existing commitments within the Local Plan are robustly re-worded to ensure compliance with key principles of Cherwell Planning

Recent developments and planning permission at the Firethorn development has demonstrated that the present wording of the Local Plan needs to be urgently addressed to ensure proper compliance with key aspects of the plan and Cherwell District Council's planning policies. In particular, the wording around the provision of affordable housing needs to be re-drafted to remove the provision allowing it to be ignored if a project is not sufficiently profitable for the developer if the requirements were to be met. The wording for any proposed development within the Local Plan should simply require the provision of at least 30% of the development. It is simply not consistent with the Local or national governmental requirements that the wording is insufficiently robust to prevent a development being granted planning permission on the basis of only 10% affordable housing, as the Firethorn development did.

Likewise, the draft plan requires re-wording to ensure that developers strictly comply with the requirement of true carbon zero housing and development and not attempt to provide only carbon neutral housing by means of off-setting or similar. Once again, the existing wording has proven to be inadequate for policing this element when developers have put forward planning applications.

Crucially the revised future plan needs to re-word and re-map the plans for North-West Bicester to ensure that the plans for any further development of NW Bicester involves the provision of improved roads infrastructure in advance of planning permission being granted, including delivery of improved Howes Lane and improvement to the ring road and vitally for there to be proper plans in place as

part of LP2040 for avoidance of funnelling of traffic through existing habitations such as Bucknell and Elmsbrook, and ensuring the plans don't just consist of proposing more traffic calming measures on the Country lane of the Bucknell Road.

The present Local Plan wording and mapping has proved insufficiently robust to prevent developers completely reversing carefully thought through traffic planning within the initial Adopted Plan, such as ensuring that any 'local centre' for the Hawkwell site is not positioned directly on the Bucknell Road and ensuring that the roads are planned to prevent and discourage the use of traffic from the North-West Bicester site and Hawkwell in particular from rat-running through Bucknell village and using the Bucknell/Bicester road to access Junction 10 of the M40. This can only properly be achieved through careful traffic management through the local plan (in similar terms to that proposed in the original Adopted Local Plan 2012) but which presently does not appear in sufficiently robust terms to prevent developers simply ignoring the plan and proposing to disgorge the entire traffic from any new estate through the villages of Bucknell, Ardley and Middleton Stoney.

For all of the above reasons, I would urge that careful re-consideration is given to the proposed Local Plan to amend and reflect the above concerns.