2nd October 2014

Local Plan Modifications Strategic Planning and the Economy Cherwell District Council Bodicote House Bodicote Banbury OX15 4AA

Cherwell Local Plan (CDC LP) Representation on the Proposed Modifications published August 2014

Objections to Main Modification 89, Page 130 Bicester, New Policy Bicester 13 – Gavray Drive

We object to Bicester 13 – Gavray Drive being allocated as a strategic housing site. It has many historical features of value to the town as well as being part of the River Ray Conservation Target Area. It also contains a designated Local Wildlife Site (LWS) noted for its biodiversity and different protected species of animals. Indeed, Cherwell LP Sustainability Appraisal Addendum (August 2014) finds that the intended planning option for this site could have a significant negative effect on biodiversity.

The historical features present on this site are documented in an Archaeological Evaluation Report (Oxford Archaeological Unit, August 1997). The site comprises several small and ancient fields with green lanes. The boundaries can be seen on old maps dating back to 1607 and match the pattern of hedges present today. The report confirms the date of these hedges as late 16th century. The ground has ridge and furrow formation derived from medieval ploughing methods, demonstrating that this land has not been intensively farmed by modern equipment. Ridge and furrow formations of national importance in the Bicester area are now rare because of the extensive development of the town.

Bicester 13 also has considerable landscape value for the town. Several ancient footpaths run through the site. One marks the historic Launton village parish boundary and is lined by an ancient hedgerow. The planned linear development along Gavray Drive (as marked in a previously submitted scoping report) would detrimentally affect this historic feature.

As this site is very close to the town centre, we argue that it is of great historic value for the community as an education resource. Designating this area for housing will destroy historical evidence, reduce biodiversity and amenity value. Thus, the LP is unsound because the NPPF Page 2, 'Achieving sustainable development' para 7, states that, the planning system should perform '• an environmental role – contributing to protecting and enhancing our natural, built and historic

Also, NPPF Section 12. Conserving and enhancing the historic environment, para 126, 'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:

• the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;'

We could not find a reference to the historical value of Bicester 13 to the town in the Modified Local Plan. The report by Oxford Archaeological Unit does not appear to have been taken into account. We maintain that the LP is not 'justified' in this regard. We ask that Bicester 13 should be protected for its historical, landscape and biodiversity assets. We also find the local plan unsound in this regard as it does not comply with NPPF :Historic environment:

Para 169. 'Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record'.

In addition the LP does not fulfil the criteria given in the Cherwell LP Sustainability Appraisal Addendum for Main Modifications (non-technical summary) page 9, Para 1.24, Table 1, Point 10, 'To conserve and enhance and create resources for the district's biodiversity', and Point 11, 'To protect, enhance and make accessible for enjoyment, the district's countryside and historic environment'.

To make this LP sound Bicester 13 should be removed as a strategic housing site and re-instated as a Conservation Area. However, most of the features documented in the archaeological report above are found to the east of Langford Brook which runs North/South through the site. Therefore a smaller development on the West side of the brook of say 200 houses, might not be so damaging to the historical or environmental value of Bicester 13 provided there is no building east of the brook.

Note: Bicester Local History Society is willing to participate in the oral enquiry in December in support of the above comments.

Yours faithfully

Bob Hessian Chairman, Bicester Local History Society, and on behalf of the Committee.