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Ref :19/02550/F Redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping

Dear Clare Whitehead,

The Oxfordshire Branch of the Campaign to Protect Rural England (CPRE) promotes the beauty, tranquility and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country.

CPRE strongly objects to this application which does not comply with Cherwell Local Plan (LP) 2011-2031 on many points. The proposals are not included in the LP and they contravene both National Planning Policies and CDC policies on green space, biodiversity and outdoor sports provision as outlined below. Such a large development with a far-reaching impact on the surrounding area requires consideration as part of a coherent development plan for the whole District and not in isolation.

The project aims to cover more than two thirds of the north-western half of Bicester Golf Course with a massive complex of buildings and hardstanding for car parking. It destroys a large area of green space which is currently shared by golfers and an important range of wildlife (as shown in the developer's biodiversity reports).

Policy BSC10 Open Space, Outdoor Sport Provision seeks "to protect existing sites and enhance existing provision and ensure that new development contributes to open space". The proposals do not conform to this policy but will instead reduce open space by removing half of a mature and important golf course and replacing it with a large hotel building with approx 500 bedrooms and a 900 space car park.

The building will displace a public footpath causing a reduced amenity for the public. This contravenes a major policy of Cherwell council which is to encourage walking and cycling as important health benefits. Rather than pass through the green open space of the golf course, the modified route will be close to the existing hotel and buildings.

Policy BSC 11 Local Standards of Provision for Outdoor Recreation requires a minimum of 1.13 ha/1000 people (Table 7). The removal of half of a golf course will reduce this provision and the deficit will be compounded further by the ongoing population increase at Bicester, Heyford and Kidlington. The loss due to the development will add to the reduction of sports provision by the removal of the North Oxford Golf Course which is proposed in LP Part 1 review.

Policy ESD8 Water Resources, para B221 states, “Cherwell District lies within an area of serious water stress and the Upper Cherwell area has been over abstracted”. The hotel will use a massive quantity of clean water (their water reports and e-mails say about 155,000 cubic metres/year for the laundry, 498 bathrooms and the swimming pools), despite provision of water-saving measures. The fairly rapid turnover of guests (average stay of two to three nights) means frequent changes of bed linen and the 498 bathrooms will also consume much water.

Policy ESD10 Protection and Enhancement of Biodiversity and Natural Environment. Policy ESD10 seeks to provide net biodiversity gain by protecting, managing and *extending existing resources* and creating new resources. The proposals do not extend existing resources, in fact the largest existing area of semi-improved neutral grassland adjacent to the M40 will be destroyed and replaced with woodland (see Appendix A, Phase 1 habitat survey map and Appendix C, Post-development habitat survey map in Biodiversity Net Gain Chapter).

The 30% net gain in biodiversity that the plans are stated to fulfil, has to be questioned and the net gain calculation needs to be re-evaluated. The data entered for the net biodiversity gain calculation (see Biodiversity Net Gain Report) looks erroneous in that the majority of existing grassland on site has been classified as amenity grassland and characterised as in ‘poor condition’. It is likely that the fairways and greens having been treated with fertiliser and herbicide will have restricted biodiversity and it is correct to describe them as amenity grassland, but given the age of the golf course, the roughs would have developed a richer ecology and could be classified as semi-improved grassland. Furthermore, inspection of the biodiversity calculation shows that the condition of *all* the existing areas of grass, woodland, scrub, parkland and trees have been rated as ‘poor’ (see Table 3-1 Summary of baseline area). This is highly unlikely given the range of plant and animal species found in the surveys. The effect of blanket rating these habitats as in ‘poor’ condition makes it easier to then calculate that the plans to develop supposedly better habitats on a much reduced area of land will bring enhancements.

In the Biodiversity Net Gain report, Appendix C Post Development Habitat map shows that the developers propose to enhance the biodiversity of the site by creating small scattered areas of semi-improved (SI) neutral grassland. This is not easily done from amenity grassland (1). The golf course was built on farmland and this likely means that there is a latent high soil fertility. In addition, the amenity grassland will have been treated with fertiliser and herbicides which reduces the likelihood of successful growth of wildflowers typical of neutral grassland. It takes many years for the creation of SI neutral grassland of ‘good’ condition from fertilised soil (1) and it is unlikely that this can be achieved within 10 years.

The Appendix C map shows that the two largest areas of SI neutral grassland to be created are on the east side of the building within the footprint of the two wings either side of the entrance. This position means that they will be largely in the shade, thus not a good position for a successful wild flower meadow. The remaining isolated patches of SI neutral grassland to be created are scattered around the site and are thus difficult to manage in order to become a coherent habitat.

Policy ESD13 Local Landscape Protection and Enhancement. This policy seeks to conserve and enhance the distinctive and highly valued character of the entire district. It states that proposals will not be permitted if they cause undue visual intrusion into the open countryside and are inconsistent with the local character, or impact areas that have a high level of tranquillity. The proposals for a four storey massive building and 900 space car park covering two-thirds of a green field site in open countryside do not agree with this policy. The development will intrude and is inconsistent with the local character of the landscape. Illumination of car park and buildings at night will reduce the tranquillity of the area.

Policy ESD15 Character of Built and Historic Environment. Para B263 states, “We will maintain the character of our historic villages and towns”. The village of Chesterton is historic and has its distinct character. The proposed development will impact negatively on this village as it will bring increased traffic (both cars and proposed shuttle buses) to the site. The tendency for people to make rat-runs to the site via the shortest routes is inevitable and will also negatively affect several other local villages of Little Chesterton, Wendlebury, Middleton Stoney, Ardley and Weston-on-the-Green.

The proposed hotel building is four storeys high and the design is very ugly, thus the design and mass of the building is at variance with the smaller scale older buildings in Chesterton and Little Chesterton and will have a negative effect on the built environment.

Policy ESD17 Green Infrastructure. This policy protects natural and semi-natural green space *including outdoor sports facilities*. The reduction of a large amount of green space to disappear under this development markedly offends this policy.

Turning to national planning policy, this application does not comply with the NPPF paragraph 170. The plans do not contain 'coherent ecological networks that are more resilient to current and future pressure'. They destroy a lot of ecology and fragment existing habitats. Neither do the plans 'improve local environmental conditions such as air and water quality'. As discussed above, the development will bring a large number of people and their cars to the area creating noise and air pollution.

CPRE strongly suggests that this application is refused.

Yours sincerely,

Pamela Roberts

Dr PJ Roberts
Vice Chair Cherwell District, CPRE

Copies to: Sir David Gilmore, Chairman Cherwell District CPRE
Helen Marshall, CPRE Director

Reference 1. Lawson C. and Rothero E. Chapter 10. Restoration and creation of floodplain meadows. in Floodplain Meadows - Beauty and Utility. A Technical Handbook.