

Consultation on Proposed Main Modifications of the SODC Local Plan

This is our last consultation on the Local Plan and our last opportunity to try to influence the outcome and what goes in the Inspector's report, so we urge you to respond.

The deadline is the midnight Monday 2nd November 2020.

You can respond via the **on-line survey** found here - <https://survey.southandvale.gov.uk/s/SouthLocalPlanMainMods/>

Or by e-mail planning.policy@southoxon.gov.uk

or **post** to **Freepost SOUTH AND VALE CONSULTATIONS** (no stamp is needed and no further address is needed)

If responding by e-mail or post use their form, which is available in Word or pdf formats from the SODC web site and asks for the same information as the on-line survey – Forms can be found here at the centre of the page - <https://www.southoxon.gov.uk/south-oxfordshire-district-council/planning-and-development/local-plan-and-planning-policies/forthcoming-planning-policies/our-forthcoming-local-plan/> A word format copy is attached.

The responses are focused on the first of the four documents the Main Modifications. The others don't really affect us, but you are most welcome to read them and respond too.

Part A – This asks for your name and address and you only need to send one copy with all your other comments.

Part B – You will need to copy this form a number of times depending on how many 'Modifications' you would like to comment on. Please use a separate form for each Modification.

It is important in responding that you use your own words and say how it affects you and how you feel. If SODC or the Inspector sees copying and round robins they are likely to reject the responses.

Here are the proposed Main Modifications for comment - <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/09/1-Main-Mods-Schedule-Sept-2020.pdf> Additions are in bold underlined and deletions crossed out. Each part of the Main Modifications have been copied before the Comments, but you do not need to do this when responding. The section, paragraph number and page number will suffice. So here are some points about the contentious Modifications you may wish to respond to.

Please do use the phrase 'unsound' as often as possible when disagreeing with a Modification.

Modification Number

MM2 and MM4

Document, section, paragraph or page number **Objective 8.2 Page 23 and Page 28**

MM2

“Minimise carbon emissions and other pollution....**Support growth in locations that help reduce the need to travel**”

MM4

“The spatial strategy supports growth in locations that help reduce the need to travel such as ... allocations adjacent to the City of Oxford”

Comments –

Points –

- Building approximately 8,000 new homes above the requirement to meet the ‘housing need’ for South Oxfordshire does not minimise carbon emissions
- In practise for Oxford this means building in the Green Belt which is damaging to the environment and habitats, causes urban sprawl and does not minimise carbon emissions
- Sustainable travel to reduce carbon emissions would be along railway lines e.g. commuting into Oxford from Didcot, Bicester etc
- Building on the edge of Oxford e.g. at Land north of Bayswater Brook (LnBB) would increase traffic on local roads above capacity causing gridlock and additional pollution. There is no public transport or cycleways in the surrounding parishes of Woodeaton, Elsfeld, Beckley and Stowood, Stanton St John, Forest Hill with Shotover and the Otmoor Towns and so no alternative to the car for commuting into Oxford and getting around
- There is no guarantee that the people who live in the houses at LnBB or any of the other Green belt sites around Oxford will actually work in Oxford and have a reduced need to travel

Modification Number

MM5

Document, section, paragraph or page number

Page 35

2. Housing requirements **South Oxfordshire Minimum Housing Requirement- 18,600 between 1 April 2011 and 31 March 2035**

• 4,950 homes addressing Oxford's unmet housing need

Comments –

- This housing requirement is 5,000-8,000 dwellings higher than need for South Oxfordshire
- The calculations used were out of date – using the 2014 SHMA (Strategic Housing Market Assessment) based on the 2011 census for a Plan that goes to 2035 i.e. 24

years difference, when the more recent SHMA 2018 and ONS forecasts show much slower population growth for Oxfordshire and therefore a lower housing need.

- The same Inspector increased the number of homes to be built within Oxford in their Local Plan, by 2,264 so the number exported to SODC should be 2,686 and not 4,950

Modification Number

MM9 Policy STRAT6: Green Belt

Document, section, paragraph or page number **Paragraph 2 Page 43**

2. The Green Belt boundary has been altered to accommodate strategic allocations

Comments –

Suggested addition -

The amount of land taken out of the Green Belt should be kept to a minimum. Only the land required for construction of dwellings should be taken out of the Green Belt, while green spaces, landscaping and compensatory improvements to the environment should remain within the Green Belt.

Modification Number

MM17 Policy STRAT13: Land north of Bayswater Brook

Document, section, paragraph or page number

Paragraph 2 (vi) Page 71

vi) v) all necessary **facilities for movement**. transport improvements as set out in the Infrastructure Delivery Plan **If, having taken the impact of these measures into account, significant residual impacts on the highway network are still predicted, new highway infrastructure will be required to mitigate those impacts**

a. provision of high-quality pedestrian, cycle and public transport access and connectivity to Oxford City Centre and other major employment locations, particularly the hospitals John Radcliffe Hospital and Oxford Science and Business Parks, including (but not limited to) the links to and across the A40 Oxford Northern Bypass and a new pedestrian and cycle bridge across the A40 which will require a suitable landing point outside of the allocated site;

b. road access from the surrounding road network;

c. measures to mitigate any significant residual impacts on the highway network, first taking into account the benefits from the sustainable movement measures described above

Comments –

- The local Roads around LnBB are already over capacity at peak hours (in non-COVID-19 restriction times). They cannot take any more traffic let alone those causing 'significant residual impacts'. Perhaps this phrase should be changed to 'any negative impact' or something similar.

- It is questionable if the development LnBB is financially viable and it was the Inspector's idea to have a 'low car policy', probably to reduce costs for the developer to help make it viable.¹ [see reference below on financial viability]
- It is quite unreasonable to propose a 'low car policy' instead of transport infrastructure to alleviate traffic 'over capacity' on local roads, the ring road and the Headington roundabouts. If you commute into Oxford or have been caught up in queues please relate your personal experience. We have little alternative to car use with no regular public transport and no cycleway.
- It is quite unreasonable to expect that anyone living in LnBB will only want to travel into Oxford when they are on the edge of the countryside – will they never want to visit garden centres, farm shops, large supermarkets for a weekly shop, the countryside etc.
- The 'low car policy' has no evidence that it has worked anywhere on the edge of a town or city. There are a few schemes in the centre of cities or towns where parking is reduced and there is something like a car sharing scheme, but not on the edge of a city in the countryside.
- There is no guarantee that any/all residents of LnBB will work in Oxford or want to commute there.

a. a new pedestrian and cycle bridge across the A40

- This needs to be at a midpoint between the A40 ring road underpasses near the Headington roundabout and the Marston flyover/junction with the ring road.
- The existing underpass near Wick Close, Barton is narrow, does not have a clear line of visibility and potentially unsafe, particularly after dark.

b. road access from the surrounding road network;

- The Bayswater, Elsfield and Woodeaton Roads are already at full capacity in the morning peak period and cannot take any more traffic from LnBB or anywhere else.

c. measures to mitigate any **significant residual impacts** on the highway network, first taking into account the benefits from the sustainable movement measures described above

- "Significant residual impacts" should be changed to 'any negative impact' or something similar. All the local roads are 'over capacity' and will need alleviation from any additional traffic. We should not need to prove what is meant by 'significant residual impacts' before there is traffic alleviation.

¹ Ref - PSD 52. Aspinall Verdi "South Oxfordshire CIL and Local Plan Viability Assessment" - June 2020 paragraph 5.38 and it has the highest infrastructure costs of all the sites - https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204542&CODE=B79D8153BC48355D9AB3657AF388C4AB

Modification Number **MM17 Policy STRAT13: Land north of Bayswater Brook**

Document, section, paragraph or page number **Paragraph 3 Page 72**

3. The proposed development at Land North of Bayswater Brook will deliver a scheme in accordance with an agreed comprehensive masterplan The masterplan must be prepared in collaboration **and agreed** with the Local Planning Authority, **Oxford City Council and Oxfordshire County Council**.

Comments –

- The ‘and agreed’ should be restored to safeguard from SODC pushing through an unimplementable Plan.
- We are calling for a ‘Community Liaison Committee’ to ensure all the local communities are informed, consulted and involved, as they have at Barton Park and suggest this is included.

Modification Number **MM17 Policy STRAT13: Land north of Bayswater Brook**

Document, section, paragraph or page number **Paragraph 3(ii) Page 72**

...ii) includes a landscape buffer between the development and Wick Farm, as well as incorporating high quality design

Comments –

- This should also include a buffer between other homes and buildings adjacent to and affected by the development including Stowford Farm, houses in Bayswater Road, those in Elsfield parish and those near Bayswater Farm.

Modification Number **MM17 Policy STRAT13: Land north of Bayswater Brook**

Document, section, paragraph or page number **Paragraph 3 (iii) Page 72**

... iii) develops a transport and movement hierarchy which promotes non-car modes of travel and permeability across the site and beyond to Oxford City, including on and off-site public rights of way enhancements, and identifies where on-site highways infrastructure will be required;

Comments –

- In their Statement of Common Ground between SODC and Christ Church the site owners it was agreed that the ‘Link Road’ – the Headington roundabout and ring road bypass could also serve as a road for the housing estate of LnBB². The DfT traffic flow data 2019³ for this part of the ring road shows a daily average of over 34,000 vehicles

² Statement of Common Ground SODC and Christ Church – Paragraph 2.5

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204837&CODE=76C8D3FCEA9FF5355156E99E58A84B2B

³ <https://roadtraffic.dft.gov.uk/manualcountpoints/56381>

of which over 1,700 are HGVs. It would be highly dangerous for all residents to have up to 1,700 HGVs trundling through a housing estate.

- This document goes on to say this mix of 'Link Road' – bypass and housing estate road would allow traffic to travel from the Elsfeld Road to the Bayswater Road avoiding the Headington roundabout. The only way they could do this is to then use all the village roads as 'rat runs' – Bayswater Road, Shepherd's Pit Road, B4027, roads through SSJ, Beckley and Forest Hill. These roads are already over capacity and cannot take HGV traffic.

Modification Number **MM17 Policy STRAT13: Land north of Bayswater Brook**

Document, section, paragraph or page number **Paragraph 3 (ix) [new] Page 72**

Add new criterion: ix) that delivers higher density development (a minimum of 45 dph) along key frontages, transport corridors and towards the south and east boundaries of the main site and the south of the smaller site Densities on both sites will gradually reduce towards the northern landscape buffer and on the main site, densities will be lower close to Sidlings Copse and College Pond SSSI and also reduce towards the western edge of the site to reflect the sensitivities of the view cone.

Comments –

- It should ensure that all important local views are maintained and enhanced where possible including views from Elsfeld village, Stowood, SSJ, Wick Farm, near Bayswater Farm and the Bayswater Road. Only the Oxford View Cone is mentioned as an important view.
- The land drops steeply from the top of the limestone ridge where the villages of Elsfeld, Beckley SSJ and Forest Hill stand and they enjoy views across to Didcot and across the site. It must be ensured that the heights of the buildings are kept well below the visual line from these viewpoints.

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Document, section, paragraph or page number **Paragraph 4 Page 73**

An archaeological ~~assessment will need to be~~ **evaluation was** undertaken **during 2020** before the preparation of the masterplan. ~~determination of any planning application for this site.~~ Following this assessment, a A scheme of appropriate mitigation should be established, to include the physical preservation of significant archaeological features and their setting ~~where appropriate.~~

Comments –

- This site has been inhabited since pre-historic times and there are signs of Neolithic and bronze age activity. The report BHE03.1 Heritage Impact Assessment ⁴ document pages 175-220 (pdf pages 186-231) shows multiple archaeological sites across LnBB. The conclusions *“The area of Land to the North of Bayswater Brook appears to be located in an intensive area of archaeology”*
- Some trenches were dug during 2020, some behind the crematorium and a few elsewhere, but these do not cover the extent of the archaeological sites mentioned in the Heritage Impact Report. No report has been published on the Archaeological Evaluation so its value cannot be assessed. However, it is very unlikely that sufficient assessment has been carried out.
- Another report written in 2000 for the gas pipeline⁵ that has been built across the LnBB site shows a map with many more archaeological sites, at least 21. These were spread all over the site and are unlikely to have been investigated.
- It would be useful to recommend a full archaeological assessment, since there is little evidence that all these sites have been investigated. An on-site archaeologist and constant archaeological supervision of the construction should be required.

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Document, section, paragraph or page number **Paragraph 4.111 page 69**

Sidlings copse and college Pond SSSI and Wick copse ancient Woodland are located directly to the north of the site..... . **The masterplanning of any development here should take into account the recommendations of the Council’s Ecological Assessment and a detailed hydrological assessment to understand the developments effects on the SSSI must be completed prior to masterplanning.**

Comments –

- The Ecological Assessment⁶ is flawed and should not be used. There is a serious conflict of interest as AECOM who wrote it are also working for the developers of part of the LnBB. It cites a visitor survey to the SSSI, which does not appear to exist, it recommends any road should be 200m from the SSSI to avoid damage with no evidence base. Another high-quality Ecological Assessment is required, supervised and to the satisfaction of Natural England.
- Natural England and BBOWT are opposed to the development as it could damage the SSSI [Their Reg 19 responses and Hearing Statement]. Any mitigation policies must be agreed with both organisations.

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https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204848&CODE=76C8D3FCEA9FF535204643C9EFE28ED4

⁵ “ Witney Spur High Pressure Natural Gas Pipeline” - Archaeological Watching Brief 1999 Prepared by Network Archaeology Ltd for B G Transco Plc Report 236 April 2000. Appendix D Figure 2

⁶ NAT14 Ecological Assessment of Sydlands Copse and College Pond SSSI -

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190480&CODE=96FAD849B5185AA19CA170696093EFE4

- A visitor study is required, as well as another Ecological Report and hydrological assessment.

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Document, section, paragraph or page number **Paragraph 4.115 page 69**

Road capacity to the east of Oxford is already under significant pressure, particularly along the A40 and the Headington roundabout. **Residual trips made by car arising from the development on the surrounding highway network, including on the A40 and Headington Roundabout, could include improvements to the Headington roundabout and its approaches (including bus priority measures); grade separation of the Headington Roundabout; or a new link road between the A40/ B4150/ Marsh Lane junction and the A40 between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill. The provision of any additional highway capacity should be suitably phased to meet the increase in traffic demand arising from the Land North of Bayswater Brook site as and when it is likely to impact on the highway network,** so as to discourage a general increase in car usage (including from the development) through the early provision of significant levels of additional traffic capacity. **If more detailed evidence indicates that the required mitigation is a new link road, land will need to be identified and secured for delivery of this in consultation with the landowners and the County Council.** There is currently insufficient road capacity to support new, direct road access between the site and the A40 west of the Barton Park site. **Therefore, it is anticipated that the main access for the site will come via a remodelling of the Marston interchange with an additional access onto Bayswater Road which will be improved so that the access is safe. Where necessary, this may include adjoining land outside of the allocation.**

Comments –

- The 'Link Road' – the Headington roundabout and ring road bypass should not have access onto the Bayswater Road. There should be an underpass or some similar construction so there is no junction. The Bayswater Road is already over capacity and cannot take any more traffic. If you have any personal experience of sitting in queues on this road at peak times, please do include them and how long the queue was and your approximate time to reaching the Headington roundabout.
- If the 'Link Road' does have access to the Bayswater Road traffic including a proportion of the 34,000 + vehicles per day including up to 1,700 HGVs per day would use the local roads as 'rat runs' through all the local villages, especially Forest Hill to the A40. This would endanger local people and cause increased local pollution.
- For safety the 'Link Road' must be completely separate from the LnBB estate 'streets' serving the homes.
- It is quite unreasonable to think that a development of the size of LnBB with 1,100 dwellings and approximately 2,600 + additional people would not generate considerable local traffic. From the 2011 census the households in the adjoining communities of Barton and Sandhills have at least one vehicle per household and some nearer two. It is also unrealistic to think that the residents of LnBB living on the edge of countryside would only want to access Oxford and not the countryside.

- Cycleways are needed both within the site – at each end and in the middle and along the Bayswater Road to Beckley, SSJ and the countryside beyond.
 - It is difficult to envisage how reconfiguration of the Headington roundabout or the building of the 'Link Road' from the Marston/Elsfield junction to a junction with the A40 between Sandhills and Forest Hill could be phased with the development!
 - The existing cycleway between Wheatley Park school and the Headington roundabout along the A40 needs to be fully protected when the new junction of the 'Link Road' is constructed.
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If you have any queries please don't hesitate to contact

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