

SOUTH OXFORDSHIRE LOCAL PLAN 2034

EXAMINATION IN PUBLIC

WRITTEN SUBMISSION TO EXAMINATION JUNE 2020

Mr John Walsh

Matter 16 STRAT13 Land north of Bayswater Brook

Issue a. Are there local level exceptional circumstances justifying the release of this land from the Green Belt?

The Green Belt Topic Paper PSD7 (April 2020) gives the impression that the proposal to remove the Land North of Bayswater Brook (about 100 hectares) from the Green Belt is in line with the Green Belt Studies in the supporting evidence. This is considered to be incorrect.

In Appendix 2 of PSD7 there is a single sentence regarding NAT07 (Local Green Belt Study for South Oxfordshire District Council), the Green Belt Study prepared by Kirkham Landscape Planning and Terra Firma for SODC in September 2015:

“At Bayswater Book (stet) the boundary could be revised in three potential areas (Areas 15, 16 and 17) north of the Bayswater Brook.”

Area 15 is actually south of the brook and is a field of about 1 hectare included within the 6 hectare Bayswater Farm site. Area 16 is a field in Stanton St John Parish and is not included in STRAT 13 or in the Developer's larger proposal. Area 17 is two fields totalling about 3 hectares to the south-west of Wick Farm buildings and the mobile home park. The study concluded that the remainder of the area should remain in the green belt.

The Green Belt study NAT08(Oxford Green Belt Study) was prepared by LUC for Oxfordshire County Council and the Growth Board in October 2015. It puts the area OX8, which is almost exactly the same as STRAT 13, in the highest category of value for each relevant aspect of the Green Belt (see pages 223 to 225). The high score is in respect of the importance of the land in checking the unrestricted sprawl of large built up areas, safeguarding the countryside from encroachment and to preserve the setting and special character of historic towns. Only Port Meadow and the part of the Cherwell Valley that is inside the City scored higher.

The latest study NAT09(Green Belt Assessment of Strategic Sites in South Oxfordshire) was prepared for SODC by LUC in December 2018. It looks at Lower Elsfield and Wick Farm as two separate areas (01 and 02). Area 02 (Wick Farm) is then split into a number of plots, all on pages 26 to 41. It concludes that the great bulk of the site is in the highest category of harm to the Green Belt if released. It does suggest a couple of small areas which have lower impact – 16 hectares to the east of Wick Farm described as moderate – high harm (02a southeast corner) and 6 hectares at Bayswater Farm described as low - moderate harm (parcel 02c).

PSD7 gives a summary of the conclusions for NAT09 on pages 41 to 43, but forgets to include any reference to this site.

All the evidence suggests that removing this area from the Green Belt would cause the highest possible harm. Only small areas are recommended as possible future sites, none large enough to be considered strategic. The reports commissioned in 2015 and 2018 confirm that almost all the land contained within the proposal site STRAT13 is of high value to the Green Belt. The removal of the land from the Green Belt and development as an allocated strategic site would be in direct conflict with Green Belt policies and the NPPF. It is questioned what was the point of commissioning reports if the results are completely ignored?

It is therefore concluded that the removal of STRAT13 from the Green Belt is not justified nor consistent with National Policy.

Issue b

Does the plan adequately lay the framework for the sustainable development of this strategic site?

This site was added to the plan very late in the process and it shows in the lack of coordination between the plan and supporting documents. Up to this stage in the Local Plan process, little work has been done to decide a transport strategy, to explore the archaeology implications or to draw up any sensible plan for the SSSI (Sydlings Copse and College Pond).

It is therefore concluded that the policy is not sound, as it has not been positively prepared to lay the framework for sustainable development.

Issue c.

What are the impacts on landscape, the SSSIs, listed buildings and archaeology and other environmental matters and how would they be addressed?

Landscape: The lower part of the site by the brook is susceptible to flooding and is a useful wildlife area. The upper part is a valuable element in the setting of the city of Oxford and can clearly be seen from the city centre. The whole site can be seen from Headington.

The NPPF states that:

“When defining Green Belt boundaries, plans should: ... (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”

There is no significant feature to the north. At the western end there are hedges, for the rest there is post and barbed wire fence. This lack of a permanent defined physical feature will not make for a long term solution and will encourage future encroachment into the Green Belt land beyond the proposed allocation site.

SSSI: There was considerable argument in the planning of the Barton West (now Barton Park) development that the SSSI would be adversely affected at a distance of 700 metres. Development as close as 200 metres is likely to have a massive effect. The SSSI would be within hunting range of the

cats on the new development. The most specific research is a paper Thomas, R. L., Baker, P. J. and Fellowes, M. D. E. (2014) Ranging characteristics of the domestic cat (*Felis catus*) in an urban environment. *Urban Ecosystems*, 17 (4). pp. 911-921. ISSN 1083-8155 doi: <https://doi.org/10.1007/s11252-014-0360-5> Available at <http://centaur.reading.ac.uk/34323/>. This advocates an exclusion of at least 3-400 metres from houses to wildlife sites. However it recognises that there is a lack of practical examples and it may need to be more. Also the research was all carried out on neutered cats and entire males would range much more widely.

The comment by SODC in IC4A that “At present the western pond pathways is not an accessible or well used access.” is particularly misleading. It was true in 2019 as access was made very difficult because of the building work at Barton West, however that has moved forward and the path is now once again well used and will become more so as that development builds out. The AECOM report Ecological Assessment of Sydling’s Copse & College Pond SSSI NAT14 March 2019 does not mention the Barton West Development. This is a serious omission. The increase in population at the Barton West Development will cause a massive increase in public access to the SSSI before any other development is started. Natural England in their Regulation 19 response dated 15 February 2019 said

“North of Bayswater Brook allocation: Natural England consider this allocation to be unsound”.

There is no evidence I can find that they have revised their view, their letter of 29 April 2019 PSD01 repeated it.

Listed Buildings: The barn (Grade II) and well house (Grade II*) at Wick Farm are in need of restoration (identified on the 2018 at risk register). This could be achieved by a limited development of redundant buildings at the site as proposed in the draft Neighbourhood Plan for the parish. It is quite wrong for the council to claim that the restoration of the at-risk buildings is a benefit caused by the main development, it would have happened anyway. Leaving them and the farmhouse and its associated piers and walls (all grade II listed) in the centre of a modern suburban development would destroy the setting of the listed buildings.

Issue d. What is the most up to date information on infrastructure delivery and funding, notably the road accesses?

There is no evidence in the supporting documents that road plans have been looked at in any detail or properly costed. In term time the roads at either end of the site are already severely overloaded. Traffic backs up from New Marston the length of Marsh Lane and on to the roads to Woodeaton and Elsfield. Recent changes from roundabouts to lights in New Marston gave no improvement. Similarly traffic backs up in the Bayswater Road from the Headington roundabout back to the Crematorium.

Scenario 5B TRA06.5(Evaluation of Transport Impacts – Atkins) March 2019 covers

“A40 Link Road, 40mph single carriageway”.

This shows a significant volume of traffic diverting from the A40 in both morning and evening rush hours. It is not made clear whether this road will act as the main access to the proposed site allocation or will be kept separate. Either approach will lead to a series of safety and air quality problems which are not addressed anywhere in the plan. If it went through the south of the site it would separate it from the city of Oxford and mess up the rest of the transport plans. If it went

through the north of the site then the effect on the SSSI would be terminal. If it went through the centre of the site it would be very dangerous for road safety and disastrous for air quality. It is not stated whether the junctions at either end will be a roundabout or light-controlled or fully separated.

Scenario 5C TRA06.6 (Evaluation of Transport Impacts – Atkins) March 2019 covers

“the grade separation of the A40 at Headington roundabout”.

This is a project which has been looked at many times and always rejected as impractical and/or unaffordable. There is no reference to any work to suggest that this is feasible or affordable.

The £50 to £70 million set aside for transport projects appears to be the maximum sum the developer could possibly afford, rather than being based on any ground up estimate of the cost. This seems to be confirmed by the remark in appendix 2.5 of the April 2020 South Oxfordshire Infrastructure Delivery Plan (PSD27)

“Previous IDP estimated cost at £50,000,000 - £70,000,000 however this estimate may not be reliable”.

While commendably honest, this does not really help with assessing the viability of the plan. It should be noted that there are additional contributions likely to be sought from the developer for transport (appendix 2,5) (including but not limited to bus service provision upgrades and enhancements to bus travel, walking, cycling, rail travel). These additional contributions over and above the identified road improvements would impact on the viability of the site allocation development.

Issue e.

Is the delivery trajectory realistic?

There is currently no plan for the required transport infrastructure. In particular the new access at the B4150 Marsh Lane/A40 junction. Without any plan for the transport infrastructure there is no expectation that the development can be done in the plan period. It is highly unlikely that central government will have spare funding available to supplement what the developer makes available. It is most important that the proposal is not taken forward without the required transport infrastructure as it could overload the network in North Oxford completely.