



Submission from
Begbroke and Yarnton Green Belt Campaign
in Relation to Matter 6 and Matter 7 of the
Examination in Public of the Partial Review of the
Cherwell District Council Local Plan Part 1

22 January 2019

INTRODUCTION

1. Begbroke and Yarnton Green Belt Campaign (“BYG”) is a group representing the residents of two rural villages located within the Oxford Green Belt. The group was formed in response to Cherwell District Council (“CDC”) Local Plan Partial Review (the “Partial Review”) that is proposing to build 4,400 houses in the south of the Cherwell District.
2. This submission relates to Matter 6 and Matter 7 as set out in the Draft Hearings Schedule and Matters and Issues that was published by the Inspector on 18 December 2018.
3. Specifically, the two allocation sites to be reviewed in this document are PR8 (Begbroke) and PR9 (Yarnton). The document is divided into two sections, Part A that covers matters including the Green Belt, site selection and site sustainability. Part B covers transport matters specific to the two sites and this has been prepared on behalf of BYG by Railton Limited.
4. BYG also endorses the submissions made by the Cherwell Development Watch Alliance (CDWA) and its constituent Associations that review overarching points related to the Partial Review including all seven of the allocation sites.

PART A

SECTION 1: ABOUT SITES PR8 AND PR9

5. Sites PR8 and PR9 constitute an important and strategic Gap between two villages of Yarnton and Begbroke. Site PR8 also form the strategic gap between the two villages and Kidlington village to the east.
6. Yarnton and Begbroke are small settlements. Yarnton has a population of approximately 2,545 and approximately 1,400 dwellings; Begbroke has a population of approximately 780 and 350 households.¹ Both villages are Category A Villages that according to Policy Village 1 of the adopted Cherwell Local Plan Part 1 are subject to only “minor development” and “to accommodate infilling or conversions”.²
7. Site PR8 is for 1,950 houses, and PR9 440 houses. The scale of both of these developments is not in proportion to the existing settlements of Begbroke and Yarnton and will significantly alter the existence and unique identity of these two historic villages.

SECTION 2: GREEN BELT

Sites PR8 and PR9 make strategic contributions to the purpose of the Green Belt

8. PR8 and PR9 are both part of the Oxford Green Belt. Site PR8 (Begbroke) contains open, productive agricultural farmland (Agricultural Land Classification grades 2-3³), together with footpaths and hedgerows. PR9 (Yarnton) is productive agricultural farmland and of high landscape value as it contains one of the few hills in the area that provide far-reaching views across to the Vale of Aylesbury.

¹ 2011 Census data

² Cherwell Local Plan Part 1, 2015

³ “Agricultural Land Classification map London and the South East (ALC007)”

<<http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>>.

9. The Cherwell Green Belt Study from April 2017⁴ reported the sites PR8 and PR9 are highly critical to the function of the Green Belt. The report reviewed both sites and assessed the harm that would be done to the Green Belt were they to be removed. PR8 and PR9 both received a “high” rating for harm, the highest level that could be assigned.

10. Specifically, the report makes the following comment on the site (PR51) that contains what would become known as PR9:

“The site as a whole is critical to the maintenance of separation between Yarnton and Begbroke, and for the most part constitutes open farmland with a strong countryside character, development of which would represent significant encroachment on the countryside and would potentially detract from the generally rural character of the high ground surrounding Oxford.” (PR40e, p.169)

11. In relation to the site (PR20) that contains what would become known as PR8 comment was made:

“The site as a whole is critical to the maintenance of separation between Kidlington, Yarnton and Begbroke, and despite the proximity of urban edges retains a relatively strong countryside character.” (PR40b, p.69)

12. We note the reference to the “value of a meaningful gap” in the LUC report prepared for North Warwickshire Council in January 2018.⁵ The strip of land between the northern perimeter of Site PR9 and Begbroke village boundary that runs along Rowell Brook is approximately 50m wide. This cannot reasonably be termed a meaningful gap.

13. The evidence clearly shows the two sites perform strongly against the purposes of the Green Belt. The removal of the sites from the Green Belt will lead to the

⁴ PR40 Cherwell Green Belt Study (April 2017) and Addendum (June 2017) Part 1, <https://www.cherwell.gov.uk/downloads/download/375/cherwell-green-belt-study-april-2017-and-addendum-june-2017-part-1>.. See Appendix 1 Part 1 (“PR40b Appendix 1 - Part 1 of 9 - Sites PR14 to PR21”) and Appendix 1 Part 4 (PR40b Appendix 1 - Part 4 of 9 - Sites PR48 to PR51) for the detailed assessment of the two sites.

⁵ LUC, “Assessment of the Value of the Meaningful Gap and Potential Green Belt Alterations (Jan 2018), https://www.northwarks.gov.uk/download/downloads/id/7258/cd610_assessment_of_the_value_of_the_meaningful_gap_and_potential_greenbelt_alterations.pdf.

coalescence of the two villages and urban sprawl, features that Green Belt policy is designed to protect against.

14. The Green Belt review is listed in the Partial Review as being ‘strategic’.. In contrast, the Sustainability Appraisal (“SA”) states⁶:

“The overall impact on the Green Belt and its purposes, including the amount of land needed to be removed to effectively implement the Plan, has been considered by the Council in the context of the outcomes of the SA, for example in relation to the significant positive effects for affordable housing provision in locations which best help to meet Oxford’s unmet housing needs”

15. In this conclusion there is no mention of Strategic Gaps, defensible boundaries or integrity and permanence, and “best” is not defined at all in the SA. This feels like a major oversight, particularly as the affordable housing benefits will accrue at 50% to *any* allocated site.

Removal of too much land from the Green Belt

16. The land being removed from the Green Belt in PR8 and PR9 is too great relative to the number of houses to be built. Using the developable land and the housing densities proposed by CDC in the Partial Review options consultation document⁷, PR9 would actually provide 560 houses (rather than 440) and PR8 2,970 houses (rather than 1,950). It is also noteworthy that the housing densities were subsequently removed through the “Partial Review - Focused Changes and

⁶ See paragraph 11.7 of the Sustainability Appraisal (Document PR43)

⁷ See PR73 Cherwell Local Plan 2011-2031 (Part 1): Partial Review – Oxford's Unmet Housing Need : Proposed Submission Plan (July 2017), <<https://www.cherwell.gov.uk/downloads/download/1228/pr73-cherwell-local-plan-2011-%E2%80%93-2031-part-1>>. PR8 (Begbroke), “A new urban neighbourhood will be developed on 190 hectares of land to the east of the A44 as shown on inset Policies Map PR8... Construction of 1,950 dwellings (net) on approximately 66 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 45 dwellings per hectare” (PR73, p.121) & PR9 (Yarnton), “A village extension to Yarnton will be developed within 99 hectares of land to the west of Yarnton as shown on inset Policies Map PR9... Construction of 530 dwellings (net) [subsequently amended to 440 (FC64] on approximately 16 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 35 dwellings per hectare” (PR73, p. 130).

Minor Modifications" (FC50, p.19 & FC64-65, p.23-24)⁸ with no explanation provided.

SECTION 3: SITE SELECTION

Sustainability Appraisal: Search Area Flaws

17. Sites PR8 and PR9 form part of Search Area A. This was one of nine search areas, A–I that were considered by CDC and outlined in the Options Consultation (Nov 2016). The area of search was quickly narrowed to only examine search areas A and B, both of which are in the south of the Cherwell district.⁹ The evidence in the Sustainability Appraisal ("SA") that was used to justify this process is contradictory at best, and in places inaccurate.¹⁰ As an example, the SA objective 10 relies on incorrect data on PR8 and PR9 from the Transport Assessment with this outlined in more detail in paragraphs 22 to 31 of this report. SA Objective 8 is to protect and enhance landscape with this achieved by measures including "accessibility of the District's countryside in a sustainable and well-managed manner", "improve the landscape, ecological quality and character of open spaces" and most critically for Search Area A, "prevent coalescence between settlements". Area A comprises a large proportion of the Oxford Green Belt with a key function being to prevent urban sprawl and coalescence of settlements. The six green belt

⁸ <<https://www.cherwell.gov.uk/download/downloads/id/6802/partial-review---focused-changes-and-minor-modifications.pdf>> (Feb 2018).

⁹ The Options Consultation makes clear (6.2) that CDC proposed seven sites to the Oxfordshire Growth Board's spatial options analysis. All but one were Green Belt sites and carried forward into the Options Consultation ("We have therefore ensured that the options considered by the Growth Board are included within the range of options for the Local Plan Partial Review" (6.5). Whilst nine broad Areas of Search were identified (6.6) in the Options Consultation, and subject to an Initial Sustainability Appraisal (7.33ff), CDC jumped to an assessment of strategic development sites within Areas of Search A and B only (7.44). The promise of "Further and more detailed evidence is required in the continued testing of options and in developing a strategy and plan proposals" (7.53) was limited to a subset of sites in Search Areas A & B, carried forward into the Submission Plan.

¹⁰ The Issues Consultation (Jan 2016) defined the overall approach, "If an 'area of search' is defined that extends beyond the Green Belt or if it is decided that Oxford's unmet need should be addressed on a district-wide basis, then it will be necessary to compare reasonable options within the Green Belt against those outside. Ultimately, all reasonable alternatives will need to be comparatively assessed including those for defining the 'area of search' or plan area itself." (4.19, see also "Oxford Green Belt" 4.9-4.19)

sites should score negatively given the loss of high-performance Green Belt sites¹¹ yet Area A rated “minor negative effect, effect unknown” with the comment on the impact “uncertain” until “the location, layout and landscaping of the development is known”.

18. The Council did not undertake an adequate appraisal of site options within reasonable search areas other than A & B, which resulted in proposed major development on sites PR8 and PR9. The SA report accentuates the positive effect of search areas A & B on the strategic objectives whilst paying little attention to the positive effects of search areas E & C, in particular, also on key objectives. We would have expected the SA report to have placed greater weight on the negative effects of removing land from the Green Belt to provide a balanced assessment against the other search areas and sites. . This is especially critical given the importance of the strategic Gap represented by PR8 and PR9 (and the other Green Belt sites on grounds of preventing urban sprawl and openness).
19. The reasons presented for rejecting search areas C-I do not provide an adequate differentiation with search areas A & B.¹² For example, the observation that search area C (Junction 9, M40) will result in a new growth settlement, disrupt the existing settlement hierarchy, and impact on the rural character of the area (contrary to Local Plan policy ESD13), equally applies to proposals for search area A in coalescing the villages of Begbroke and Yarnton and all but merging these two villages with Kidlington, Gosford and Water Eaton, and a substantial closing of the gap separating the areas from Oxford City.
20. The definition of “well-located” as “in close proximity to” (relating to geography) is an artificial constraint on the selection of sites. Search area E (Bicester), for example, scores positively with respect to proximity to sustainable transport links to Oxford (and could include the south of Oxford should the Cowley branch line be re-opened) and is already an established commuter town for a significant number of Oxford city workers.¹³ (See also Local Plan, C.98.). Bicester also has a Park

¹¹ PR40 Cherwell Green Belt Study (April 2017) and Addendum (June 2017) Part 1, <https://www.cherwell.gov.uk/downloads/download/375/cherwell-green-belt-study-april-2017-and-addendum-june-2017-part-1>.. See Appendix 1 Part 1 (“PR40b Appendix 1 - Part 1 of 9 - Sites PR14 to PR21”) and Appendix 1 Part 4 (PR40b Appendix 1 - Part 4 of 9 - Sites PR48 to PR51) for the detailed assessment of the two sites.

¹² See paragraph 7.73 pf the Sustainability Appraisal

¹³ See paragraph C.98 of the Cherwell Local Plan Part 1 adopted in July 2015

and Ride capable of taking 580 cars with journey times for the S5 bus to central Oxford of 27 minutes. In contrast the S3 from Begbroke takes 36 minutes to reach central Oxford. The Bicester Park and Ride is not at full capacity with its construction meeting future growth of Bicester¹⁴, and it has potential to expand.

21. The conclusions on PR8 and PR9 drawn by Cherwell in the SA (PR43d) appear to have no relationship to the methodology for decision-making proposed by the SA. Some representative examples are highlighted below:

- (i) SA01 states “the Council’s HELAA provides further detail about the potential site capacity”. The SA was published was June 2017 yet the HELAA was not published in draft form until 25 August 2017, and in final form in February 2018. It is unclear how the HELAA could have informed on this point.
- (ii) SA06: The opportunity to link existing services and facilities in Kidlington fails due to the closure of Sandy Lane, the main vehicular link between the two sites.
- (iii) SA02: Greenspaces and public footpaths are cited. The SA fails to recognise the public footpaths that criss-cross the open fields in the site will be lost due to the development, while many of the greenspaces are located in Kidlington which will become less accessible due to the transport mitigation strategy.
- (iv) SA08 on page 441 of the SA fails to provide evidence as to how the loss of the open fields in PR8 that form the Green Belt strategy gap between the villages will improve the landscape and prevent coalescence. Despite the location of the site now being know in Area A, PR8 continue to only be rated “minor negative effect, effect unknown” (See para 16 of this report).

These decisions need to be reviewed, having regard for a methodical assessment of the evidence applied across the wider area of search.

¹⁴ Oxfordshire County Council spokesman Paul Smith said: “The facility was built with an eye to the future of Bicester as much as the present.” (extracted from Oxford Mail article dated 5 December 2015 <https://www.oxfordmail.co.uk/news/14125757.eye-to-the-future-just-six-cars-use-35m-bicester-park-and-ride-in-first-two-days/>)

Incorrect Assessment of Site PR8 and PR9 in the Sustainability Appraisal and Transport Assessment

22. In various reports that form the evidence base for the selection of preferred sites, Site PR9 has been incorrectly assessed. This includes the Sustainability Appraisal (“SA”)¹⁵ and the Transport Assessment (“TA”).¹⁶
23. Figure 1 has been extracted from the Sustainability Appraisal.¹⁷ PR8 is highlighted in this map (formerly referred to as PR20). This representation of PR8 is highly misleading. As illustrated in Figure 2, the area shaded red forms the part of PR8 that lies to the east of the railway line that bisects the site. This shaded area is next to Kidlington village. This shaded area contains zero houses, with the new developments all located to the west of the railway line and adjacent to Yarnton and the A44.

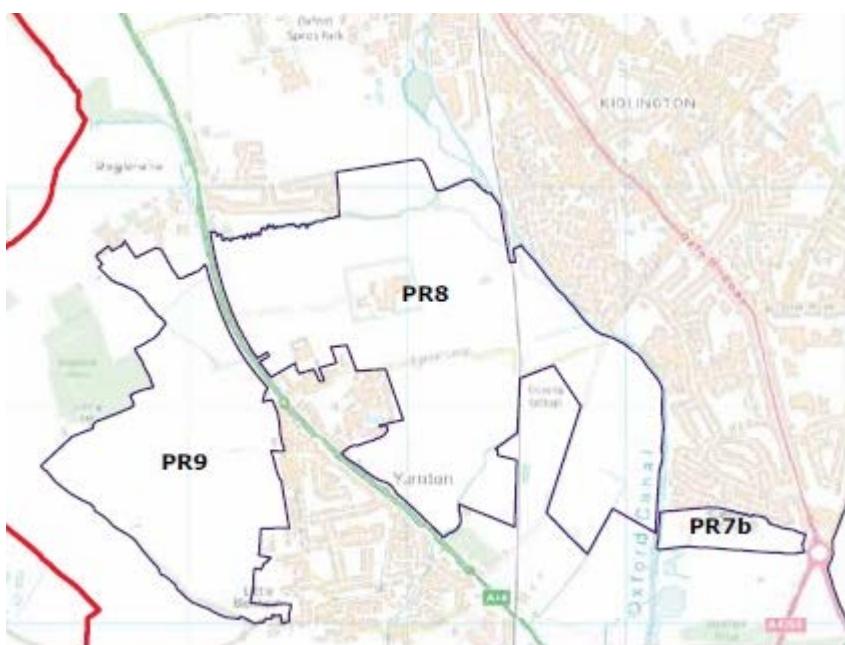


Figure 1

¹⁵ See the Sustainability Appraisal, document PR43 of the CDC emerging evidence base.

¹⁶ The Transport Assessment is document PR52 of the CDC emerging evidence base and was published in July 2017.

¹⁷ See Figure 10.1 in Section 10 of the Sustainability Appraisal

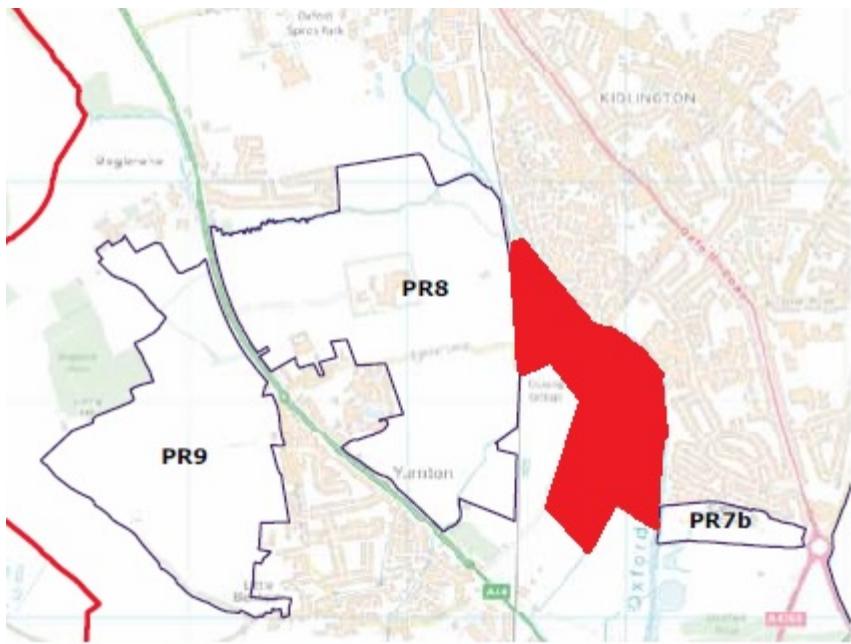


Figure 2

24. The inclusion of this shaded part of PR8 distorts the assessment of this large site on a number of parameters, including proximity to current sustainable transport services, access to jobs by road, proximity to future transport investments and local transport investments, due to these features and improvements being associated with existing services or proposed transport improvements in Kidlington. There is also a failure to allow for the proposed closure of Sandy Lane that will reduce accessibility to Kidlington by vehicular travel from PR8 (and PR9). This is evidenced in the transport Assessment. PR8 has received five “green”, two “amber” and three “red” ratings and was ranked 8th out of the 42 sites analysed for best performance.¹⁸
25. Our analysis using the same Red / Amber / Green assessment (“RAG”) metrics in the TA (pages 71 to 74) would return no green ratings, four “Amber” and six “Red” ratings.¹⁹

¹⁸ See Figure 6-3 of the Transport Assessment (document PR52) for the full rankings of the 42 sites reviewed

¹⁹ The RAG metrics used at this stage are summarised in Table 6-2 of Section 6 of the Transport Assessment

Metric	TA RAG	New RAG	Comment
1 Commuter travel mode split from within each site option	Red	Red	No change
2. Proximity to current sustainable transport services and infrastructure that serve Oxford	Green	Yellow	<ul style="list-style-type: none"> PR8 is not located within 500m of a premium bus route defined as four buses/hour, and is greater than 2.5km of a rail station
3 Proximity to current sustainable transport services and infrastructure that serve Cherwell	Green	Yellow	<ul style="list-style-type: none"> PR8 is not located within 500m of a premium bus route defined as four buses/hour, and is greater than 2.5km of a rail station
4. Access to Oxford jobs by walking and public transport	Yellow	Yellow	No change if evidence can be provided to justify this rating.
5. Access to Oxford jobs by road	Green	Red	<ul style="list-style-type: none"> The closure of Sandy Lane means Site PR8 rates the same as PR9 due both sites having to use the congested A44 corridor to access jobs by road
6. Traffic conditions on key nearby routes	Red	Red	No change
7. Proximity to future transport investment needed for other strategic developments	Green	Red	<ul style="list-style-type: none"> Change to red as no evidence is provided to justify how the site is in the vicinity of proposed investments that are fully or 50% funded; this could rate as "Amber" IF evidence can be provided by CDC or OCC.
8. Proximity to future transport investments that complement other strategic development	•	Red	<ul style="list-style-type: none"> Change to red. PR8 or PR9 is not directly served or likely to benefit from the proposed Rapid Transit line. Improvements to the A44/A4260 corridor (PR36) are aimed to try and address existing congestion issues
9. Road safety incidents near to site	Red	Red	No change
10. Proximity to Cherwell and Oxford Air Quality Management Areas ('AQMAs')	Yellow	Yellow	No change

26. In the same report, Site PR9 scored six “amber” and four “red” ratings and was ranked 40th of the 42 sites analysed. Applying the metrics correctly, PR9 should score seven “Red” and only three “Amber” ratings due to changes to Metrics 1, 7 and 8. See page 85 of the TA for details.

27. Given such poor performance, especially given these transport metrics would directly contribute to the rating of the site in the Sustainability Appraisal, it is not explained why PR9 was selected, nor how this analysis led to the determination of Area A over the other identified areas.
28. Paragraph 4.17 of the SA appears to rule out land west of the A44, as explained on page 23 of PR40a that states: "In the Yarnton / Begbroke / Kidlington area – one option would be joining Yarnton and Begbroke to the east of the A44, retaining an open corridor of Green Belt between them and Kidlington and retaining separation between the settlement areas to the west of the A44", i.e the land that is the proposed PR9 site. PR9 is also weak²⁰ in terms of the approach to mitigation²¹, including how to achieve a defensible boundary (paragraph 3.31 and the measures set out in Table 5.1).
29. Similar Green Belt Sites in Area A, such as Site PR14 in Kidlington, were omitted from the Submission Plan despite the fact that the SA concludes that they are unconstrained, with a defensible boundary and not in a Strategic Gap. Site PR14 is also within walking distance of the Banbury Road, where Rapid transport is planned as highlighted by Figures 7 and 8 of the Partial Review (pages 50 and 51) showing it runs through the centre of Kidlington. Site PR14 also scored a 'moderate' in terms of harm rating to the Green Belt against a harm rating of 'high' scored by PR9 (then PR 51a and PR51b). This information is purely to demonstrate inconsistency of assessment rather than promoting Site PR14, which is on the Green Belt, as an alternative site.
30. The analysis that led to the preferred selection of these sites is therefore inaccurate.

²⁰ Para 4.15 of PR20 says that the NPFF that GB boundaries should be defined clearly using physical features that are readily recognisable and likely to be permanent. But the boundary to the west of PR9 is weak, which is further evidenced by Gerald Eve's request to release more land beyond the hedgerow boundary on PR9.

²¹ PR40a Cherwell Green Belt Report, P.34 "5.9 Should the District decide to release land from the Green Belt, we recommend that outline policy guidance or masterplans are prepared as part of the Local Plan process. These masterplans should draw on the findings of this Green Belt Study to indicate precise development areas, new defensible Green Belt boundaries (existing or new features) and appropriate development heights and densities. Such an approach, together with specific policies for the development of the land, would help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt."

31. The failure to accurately undertake the area search and specific site selection process means that all options have not been exhausted prior to turning to the use of Green Belt land to accommodate any potential housing need. The metrics used to assess various green Belt sites were then not applied consistently. This is unacceptable and sets a precedent that threatens the existence and purpose of the Green Belt in Oxfordshire and nationally.

Housing Growth Deal does not dictate site selection

32. The Government's Housing Growth Deal for Oxfordshire and associated funding of £215 million over five years is tied to the delivery of 100,000 houses by 2031. The Housing Growth Deal does not apportion where within Oxfordshire the houses should be located, does not confirm that there is an unmet housing need in Oxford City, nor require any district to take on an unmet housing need from a neighbouring district.

33. The existence and associated terms of the Housing Growth Deal therefore do not provide the exceptional circumstances needed to remove land from the Green Belt.

SECTION 5: SITE SUSTAINABILITY

Proximity to Rapid Transit Lines 1 and 3

34. The proximity of PR8 and PR9 to the proposed, and currently unfunded²², Rapid Transit Lines 1 and 3 is used to justify their inclusion in the Partial Review. This is incorrect as neither site will directly benefit from the Rapid Transit. The route of lines 1 and 3 is from the proposed park and ride at the junction of the A44 and A4095, along the A44 then along Langford Lane towards Kidlington and Oxford.

35. The northern edge of PR8 is over 1 km from the corner of the A44 / Langford Lane junction, with the centroid for this site being a greater distance away. Similarly, the northern edge of PR9 is also more than 1 km from the A44 / Langford Lane junction. These distances are greater than the required walking distance a site should be from public transport. With the Rapid Transit not directly serving the two sites, more than half of the proposed houses will be reliant on (as-yet non-existent) new conventional bus services. The commercial viability of the bus services remains unproven.

Site PR8 and PR9 will fail to achieve the desired cycling and walking modal shifts resulting in increased car usage

36. The spatial location of the sites relative to Oxford must be considered given the assertion that the Partial Review is to meet the unmet housing need of Oxford. Setting to one side the argument about the veracity of any such need, sites PR8

²² On 27 November 2018, the Oxford Growth Board published the Housing and Growth Deal Infrastructure Programme. This document outlines the allocation of the £215 million of funding received under the terms of the Growth Deal against specific projects across Oxfordshire. The only Rapid Transit Line to receive funding is Line 2. Only the section of Line 2 that runs from A40 (outside of Oxford) to Eynsham is being funded with this scheme receiving 10% of the total £36 million needed. Three other references to Rapid Transit are connected to bus and cycle schemes that form the Oxford South East Corridors work. The Growth deal will provide £1.3 million or 0.07% of the £187.4 million in funding required to deliver these schemes. Rapid Transit Lines 1 and 3 received zero funding.

(https://www.oxfordshiregrowthboard.org/wp-content/uploads/2018/12/OGB-projects-years-1-2-5-OCC-V2_jasedit.pdf)

and PR9 have been selected due to their close relationship with Oxford and ability to be sustainable developments.

37. The estimated centre point of site PR8 is 9 km from the centre of Oxford (Carfax Tower), 10 km to the John Radcliffe Hospital in the east of Oxford and 14 km from the BNW Car Plant located at Cowley in the south of Oxford. The estimated centre point of Site PR9 is a similar distance away from these three locations. These three locations have been selected as representative locations within the three major employment centres of Oxford²³. It should be noted that employment from the centre of Oxford is migrating away to the south and eastern parts of the city.²³
38. The geographical location of these two sites is not able to provide cycling or walking as sustainable options for accessing the major employment centres of Oxford. The average cycling journey was reported in 2015 to be 4.8 km. The three locations represent journeys that are 90-200% higher than the national average. It will take approximately 1 hour 45 minutes to walk to the centre of Oxford and 2 hours 45 minutes to the BNW Car Plant.²⁴
39. The Partial Review aims to achieve a modal shift of 25% walk and 25% cycle to replicate Oxford City. Census data shows in Yarnton 6.0% cycle and 4.7% walk and Begbroke 3.2% cycle and 2.9% walk (in Kidlington only 6.4% cycle and 8.8% walk).²⁵
40. These data show that achieving a modal shift to mirror Oxford cannot be achieved due to their geographical location, a fact that cannot be altered by investment in cycle ways and pedestrian schemes.
41. If PR8 and PR9 are being proposed to meet employment needs located outside of Oxford, then the location of the two sites is called into serious doubt. Cherwell Local Plan Part 1 provided for no strategic development in the villages of Yarnton, Begbroke (or Kidlington), as there is no housing need in these areas of the magnitude being considered by the Partial Review.

²³ See paragraph 2.34 and Figure 2-8 of the Transport Assessment, July 2017 prepared by iTP

²⁴ These walking times have been calculated using Google Maps

²⁵ See Paragraph 2.31 and Figure 2-7 of the Transport Assessment which cites 2011 Census data

SECTION 6: OTHER MATTERS

Absence of local support

42. During the Options Consultation by Cherwell, there were 1,460 responses received.²⁶ The majority of these representations were objections to the proposed development. The following is an excerpt from the CDC public reports pack²⁷:

"Most of the responses received were objections. Most were received by email and therefore many did not include postal addresses. It is therefore not possible to give an accurate geographic breakdown of the objections. However, a substantial level of response was received from communities at Yarnton, Begbroke, Gosford and Water Eaton, and Kidlington and to a lesser extent at north Oxford and Woodstock in West Oxfordshire."

Reasons for the lack of support from the communities are wide-ranging and includes topics related to loss of village identity, open green space, rural feel, transport and congestion concerns, lack of infrastructure (e.g. doctor surgeries), flooding and other environmental issues and accessibility to Kidington post closure of Sandy Lane.

43. At the Cherwell District Council to approve the plans for submission to Examination in Public, the plan received 26 votes in favour and 17 votes against. All six of the CDC councillors representing the affected area voted against the plan. The local parish councils have also opposed the plans in the Partial Review.²⁸

²⁶ Cherwell District Council Public Reports Pack, February 2018, Agenda Item 6, paragraph 3.58

²⁷ Cherwell District Council Public Reports Pack, February 2018, Agenda Item 6, paragraph 3.59.

²⁸ See Document PR78 of the CDC emerging evidence base that contains the individual representations received during the 2017 Proposed Submission Plan consultation.

Oxford's Unmet Need is a planning choice that does not constitute exceptional circumstances to support removal of land from the green belt

44. It is described in detail in other submissions that the unmet housing need for Oxford is being overstated. The objectively assessed housing (“OAN”) need for Oxford has been shown in the 2018 Strategic Housing Market Assessment report²⁹ to be approximately half of that stated in the 2014 Strategic Housing Market Assessment.³⁰ The 2014 SHMA has underpinned the working assumption used to date to calculate Oxford’s unmet housing need.
45. Any figure that goes beyond the OAN is a planning choice. That this choice has been made by Oxford City Council as a local authority who is apparently unable to deliver the housing need within its own boundaries is irresponsible when set against its decision to use its own strategic land sites for economic led developments, and its systematic failure to deliver its own affordable housing targets.³¹
46. The unmet housing need of Oxford therefore does not constitute the exceptional circumstances required to justify the removal of land from the Green Belt.

²⁹ See Oxford City – Objectively Assessed Need Update Final Report, October 2018, prepared by GL Hearn.

³⁰ See the Oxfordshire Strategic Housing Market Assessment Final Report, April 2014, prepared by GL Hearn.

³¹ Oxford’s failure to achieve its minimum 50% policy of affordable housing is highlighted by the strategic development at Barton Park. This has reduced its target from 50% to 40% despite this development being on Oxford City Council owned land with no initial land purchase required. Another high-profile failing is the Oxford North site (formerly known as the Northern Gateway) that is located close to Peartree; planning applications reveal a “zero” percent affordable housing with an aspirational target of 25%. See <https://www.oxfordmail.co.uk/news/16588311.oxford-north-zero-affordable-homes-criticised/>

Site: PR20

Begbroke Science Park

Site size (ha): 174.62

Harm to Green Belt resulting from release of site

Scenario	Comments	Rating
Release of PR20 in its entirety	The site as a whole is critical to the maintenance of separation between Kidlington, Yarnton and Begbroke, and despite the proximity of urban edges retains a relatively strong countryside character.	High

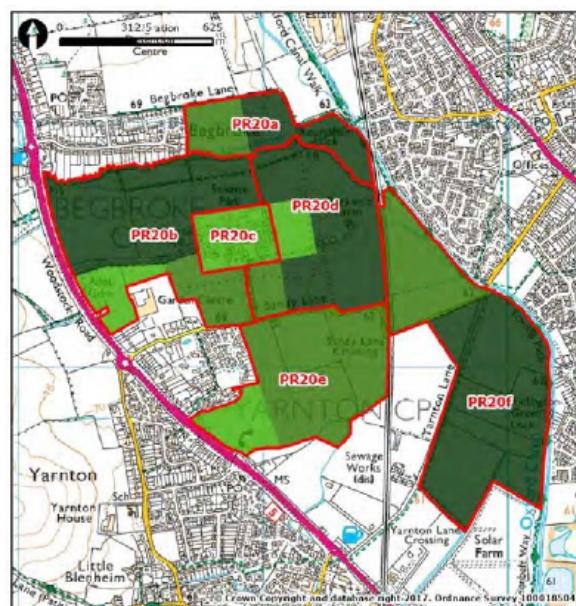
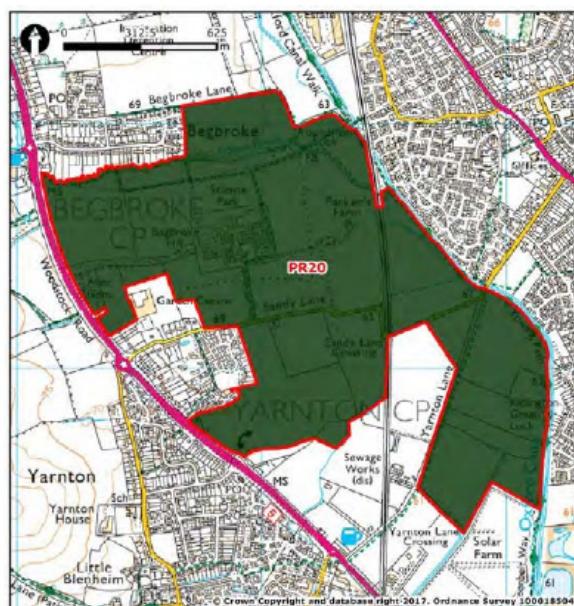
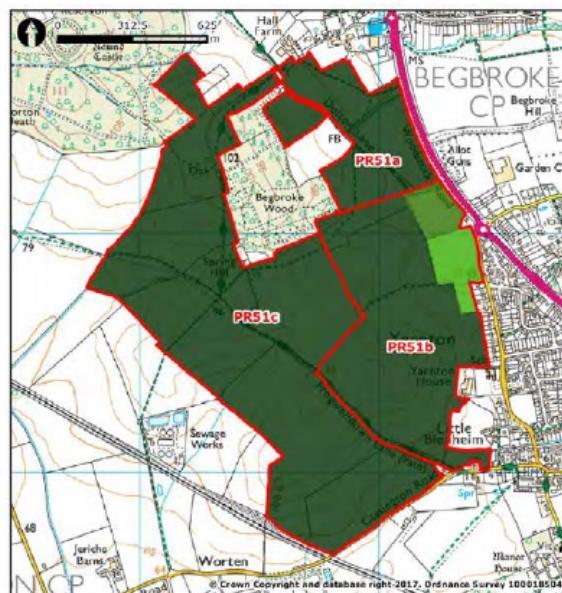
Harm to Green Belt resulting from partial release of site**Harm to Green Belt resulting from release of whole site**

Fig. 1. PR20, Begbroke Science Park, from "PR40b Appendix 1 - Part 1 of 9 - Sites PR14 to PR21", p.69.

Site: PR51	Land to West of A44/Rutten Lane, North of Cassington Road, surrounding Begbroke Wood	Site size (ha): 188.84
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Harm to Green Belt resulting from release of site		
Scenario	Comments	Rating
Release of site PR51 in its entirety	The site as a whole is critical to the maintenance of separation between Yarnton and Begbroke, and for the most part constitutes open farmland with a strong countryside character, development of which would represent significant encroachment on the countryside and would potentially detract from the generally rural character of the high ground surrounding Oxford.	High

Harm to Green Belt resulting from partial release of site



Harm to Green Belt resulting from release of whole site

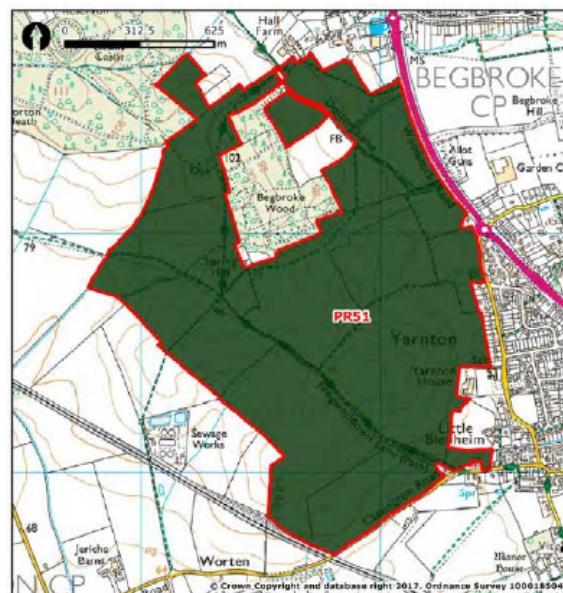


Fig. 2. PR51, Land to West of A44/Rutten Lane, North of Cassington Road, surrounding Begbroke Wood, from "PR40e Appendix 1 - Part 4 of 9 - Sites PR48 to PR51", p.169.

SECTION B: TRANSPORT

This section reviews Matters 6 and 7 on transport. The report has been prepared by Railton TPC Ltd on behalf of the Begbroke and Yarnton Green Belt Campaign.

For an overview of the wider spatial implications for the Plan area on transport related matters, please see the Representations on behalf of the Cherwell Development Watch Alliance by Railton TPC Ltd.

Cherwell Local Plan 2011-2031:

Matter 6 – Begbroke

Matter 7 - Yarnton

**Representations on behalf of Begbroke and
Yarnton Green Belt Association (BYG):**

Transport

Railton TPC Ltd



Railton TPC Ltd ref: Cherwell Local Plan
Planning Inspectorate Ref: N/A
Planning Authority Ref: N/A
Date: 23/01/2019
Author: Bruce Bamber BSc MA MSc CMILT MCIIHT

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1. INTRODUCTION

General

- 1.1. This submission has been prepared on behalf of Begbroke and Yarnton Green Belt Association (BYG) in relation to Matters 6 (Begbroke) and Matter 7 (Yarnton) to be discussed on Day 3 of the scheduled Main Hearing to consider the Cherwell Local Plan 2011-2031 Partial Review: Oxford's Unmet Housing Need.
- 1.2. A submission has also been made in relation to Matter 3 (Spatial Strategy) on behalf of the Cherwell Development Watch Alliance that concluded that the Spatial Strategy is not sound because of a failure to model the closure of Sandy Lane (an essential part of the Strategy), a failure to properly model the potential impact of development on the A44, fundamental flaws in the site selection process, and a reliance on mitigation that may not be deliverable or effective.
- 1.3. This submission focuses on more detailed matters concerning the proposed PR8 (Matter 6) and PR9 (Matter 7):
 - Movement across the railway line.
 - Cycle access into Oxford.
 - A possible new railway station.
 - The impact of the closure of Sandy Lane on existing and future travel patterns.

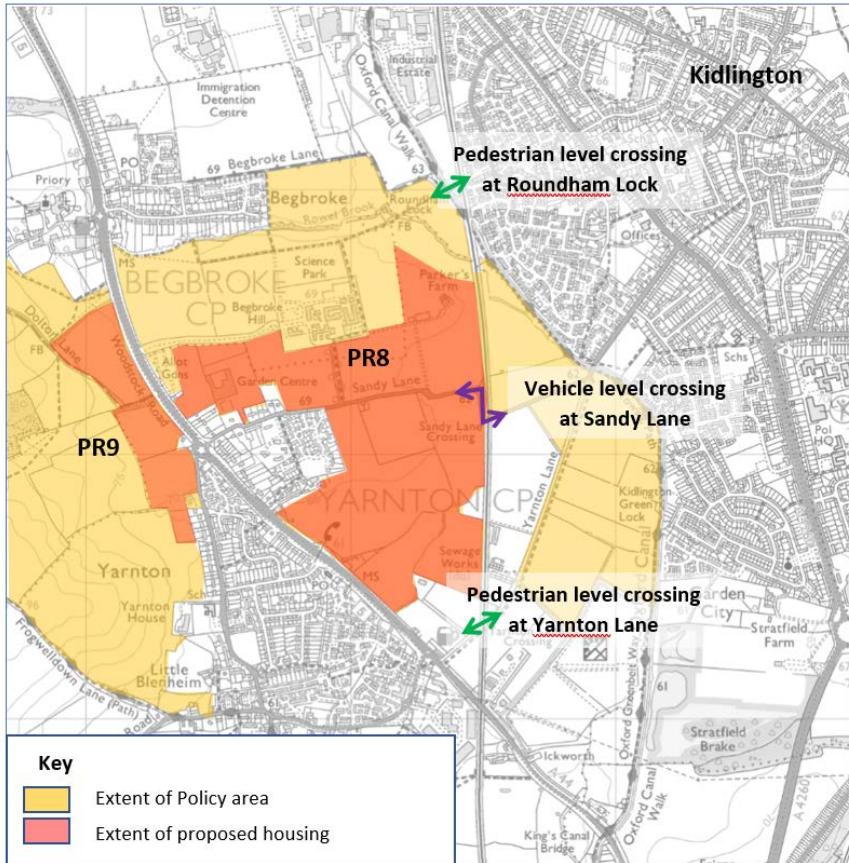
The Author

- 1.4. The author, Bruce Bamber is a member of the Chartered Institution of Highways and Transportation and a member of the Chartered Institute of Logistics and Transport and holds a Masters Degree from Imperial College, London. He is the Director of Railton TPC Ltd and has worked in transport planning for over 25 years developing transport and access strategies for a range of land uses including major development sites. He has participated in a number of Local Plan Examinations and given evidence at Public Inquiries and a DCO Inquiry.

2. MOVEMENT ACROSS THE RAILWAY LINE

2.1. Vehicles can currently cross the railway line using Sandy Lane. Pedestrians and cyclists can also use level crossings at Roundham Lock to the north of Sandy Lane and at Green Lane to the south. These are shown on the following plan:

Figure 1: Railway Crossing Points



2.2. One of the key reasons for seeking to close Sandy Lane as part of the Spatial Strategy is that a significant increase in the use of Sandy Lane would otherwise result from the PR8 and PR9 allocations, which would lead to an unacceptable increase in risk at the railway level crossing. It is proposed by Cherwell District Council to replace the existing level crossing with a bridge or underpass that could accommodate pedestrian and cycle movements.

2.3. There are two further points where pedestrians currently cross the railway line; at Yarnton Lane and Roundham Lock (see plan above). There has been no work to assess the current importance of these crossings for local residents or to assess the increase in pedestrian and cycle use at these crossings that would result from the proposed allocations.

- 2.4. Any significant increase in use would result in an increase in risk that would be opposed by Network Rail and could lead to one or both of the crossing points being closed. This would lead to a **reduction** in pedestrian and cycle accessibility for the allocation area and would lead to significant severance for those who currently use the crossing points.
- 2.5. There has been no consideration given to this important element of site sustainability.

3. CYCLE ACCESS INTO OXFORD

- 3.1. It has been implied by the ‘green’ rating given to the PR8 allocation, and to a lesser extent, the ‘amber’ rating given to the PR9 allocation, for ‘proximity to current sustainable transport links serving Oxford’ (see Section 6 of Transport Assessment, ITP, July 2017) that the proposed allocations are favourably located to benefit from high quality cycle links into Oxford.
- 3.2. ITP, at the end of Section 4 of the Transport Assessment notes the following:

‘Cherwell’s boundary with the north of Oxford is 3.7 miles/5.9 km from the city centre and the east of the city, while jobs south of Oxford are at least 5 miles/8 km away. This compares unfavourably with the national average cycle trip length of 3.0 miles / 4.8km.’ (below para. 4.5 of Transport Assessment, ITP, 2017)
- 3.3. The centre of allocation PR8 is around 9km from the centre of Oxford, around double the national average cycle trip length. Oxford’s major employment areas are further than the city centre.¹ Distances from allocation PR9 are greater still.
- 3.4. It is concluded that although the quality of cycle provision can be improved, the attractiveness of cycling for those living in the allocation sites at Yarnton and Begbroke seeking to access jobs and facilities within Oxford will inevitably be low and cycling cannot be regarded as a viable mode to access Oxford for the vast majority of people.

¹ See paragraph 2.34 and Figure 2-8 of the Transport Assessment, July 2017 prepared by iTP that states the major employment centres are located in the south and east of Oxford, with jobs migrating also migrating away from central Oxford.

4. A POSSIBLE NEW RAILWAY STATION

- 4.1. The draft Policy PR8 includes:

'The reservation of 0.5 hectares of land within the developable area for a future railway halt/station in the approximate location shown unless otherwise agreed with Cherwell District Council in consultation with Oxfordshire County Council, Network Rail and rail service providers'

- 4.2. There is no evidence that there has been any discussion with Network Rail to establish whether a new station in this location is feasible or desirable. There is also no indication of the frequency of service that might be achieved at any such station. The frequency of train services between Tackley (the next station north on the same line) and Oxford is one train every 2-3 hours. Clearly, if a similar level of service were to be provided at the new station it would cater for only a very small number of journeys into and out of Oxford.
- 4.3. There has been no work to consider how the operation of any such station could coordinate with other stations and transport hubs such as park and ride sites in the area. A new station in this area does not form any part of the current Oxfordshire Local Transport Plan. If a station were feasible and it were able to provide a meaningful service into Oxford (and elsewhere), it would constitute an alternative to local park and ride sites and the Oxford Parkway station. Drivers using the A44 would be attracted into the allocation site to make use of the facility. The draft Policy makes no allowance for the implications of this and there is no indication of how the use of the facility could be properly managed to avoid unacceptable impacts such as intensified use of access junctions and internal roads and on-street parking throughout the development.
- 4.4. It is concluded that the provision of a station in this location has not been properly assessed and its delivery cannot be relied upon as a means of mitigating the transport impacts of the development either in relation to allocation PR8 or application PR9.

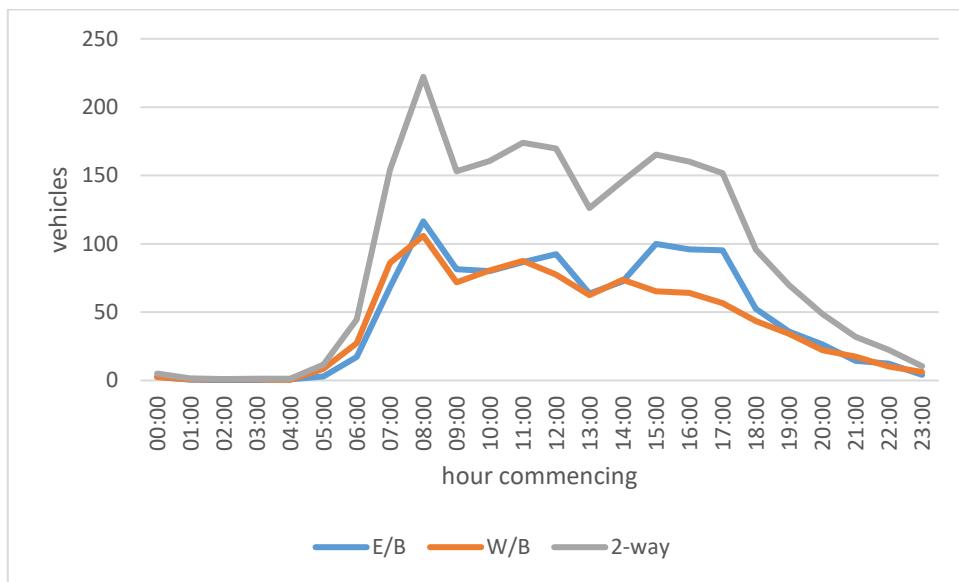
5. IMPACT OF CLOSURE OF SANDY LANE ON EXISTING AND FUTURE TRAVEL PATTERNS

5.1. Sandy Lane is currently used by many local residents in Begbroke, Yarnton and Kidlington as a means of accessing local facilities. A survey of vehicle movements on Sandy Lane immediately west of the railway line has been undertaken between 10th and 17th January 2019. The results of this survey are summarised in the following table and graph:

Table 1: Peak Hour and Daily Weekday Vehicle Movements on Sandy Lane (crossing railway line) (10/01/19-17/01/19)

time	eastbound	westbound	2-way
08:00-09:00	116	106	222
17:00-18:00	95	57	152
Daily	1,122	1,006	2,128

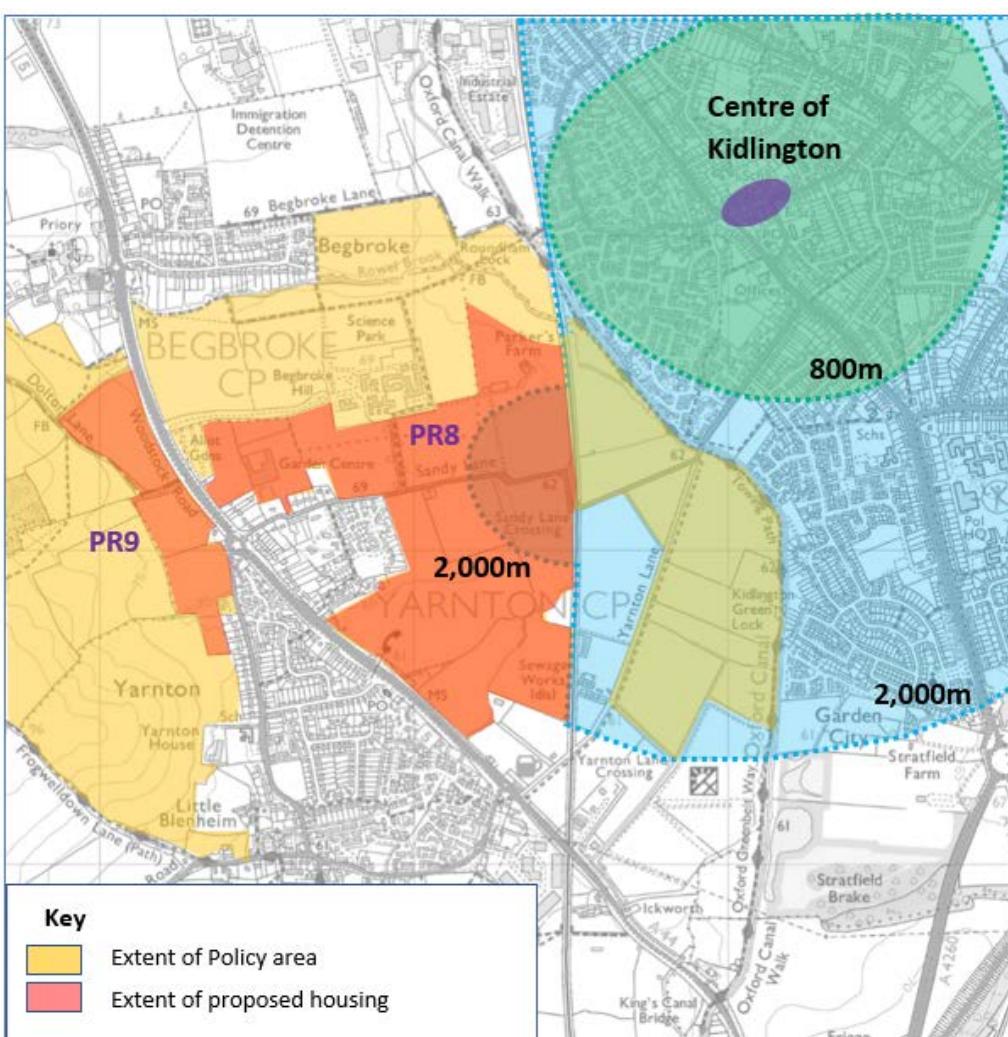
Graph 1: Weekday Vehicle Movements on Sandy Lane (crossing railway line) (10/01/19-17/01/19)



- 5.2. The surveys show that the route is used by 2,128 vehicles on a typical weekday (median figure of 2,636 vehicles). In the AM peak hour (the busiest hour of the day) there are 222 vehicle movements. For most of the day, between 150 and 200 vehicles per hour use the route. The route is used by 2,406 and 1,779 vehicles on a Saturday and Sunday.
- 5.3. The consistency of use of the route during the day indicates that it is not being used primarily as a 'rat-run' at peak times to avoid congestion elsewhere on the highway network but as the most efficient and convenient route to access facilities.

- 5.4. If Sandy Lane is closed to motor vehicles, these car journeys will either have to be undertaken on foot, by bicycle or will be diverted onto the A44 and east-west routes to the north (Langford Lane) or south (A4260).
- 5.5. The following plan shows the distance between the centre of Kidlington and the allocation area:

Figure 2: Walk Distance from Centre of Kidlington



- 5.6. A distance of up to 800m to access facilities is identified in Manual for Streets (MfS, DfT, 2007) as defining a 'walkable neighbourhood' (para. 4.4.1). The Institution of Highways and Transportation's (IHT's), 'Providing for Journeys on Foot' (IHT, 2000) identifies a preferred maximum walk distance of 2km. Figure 2 shows that none of the existing built-up area of Begbroke and Yarnton lies within 2km of the centre of Kidlington so no journeys currently undertaken by car between Yarnton/Begbroke and Kidlington could be undertaken on foot once Sandy Lane is closed to vehicular traffic. Some trips could be undertaken by bicycle but are likely to comprise a small proportion of all trips. There

will be those who currently drive who will be physically unable to undertake the journey on bicycle.

- 5.7. It is concluded that the vast majority of journeys currently undertaken by car between Yarnton/Begbroke and Kidlington will be forced to divert onto the A44 and east-west routes to the north (Langford Lane) or south (A4260). This will have the effect of worsening the predicted level of congestion on these external routes and will impose increased journey times and costs on local residents using the route to access facilities.
- 5.8. It is also pertinent to note that no part of the proposed allocations lies within 800m of the centre of Kidlington. Further, only a very small part of the allocation site PR8 lies within 2km of the centre of Kidlington. All of allocation PR9 lies well beyond 2km from Kidlington. It is therefore likely that the majority of journeys between the proposed allocation sites and facilities in Kidlington will be undertaken by car and will use routes comprising the A44 and A4260. The closure of Sandy Lane will therefore have a further detrimental impact on the external highway network, encouraging new indirect, lengthy and tortuous car journeys on congested routes to access the nearest higher order centre.

6. CONCLUSION

- 6.1. A separate submission on Matter 3 provides evidence to show that the Spatial Strategy is not sound as there has been no reliable modelling of the closure of Sandy Lane, the proposed allocations are likely to have a severe adverse impact on the A44, they will undermine the use of the A4260 as a rapid transit route, there are flaws and biases in the area selection process and the Spatial Strategy relies on mitigation that may not be deliverable or effective.
- 6.2. This submission deals with issues relating more specifically to the PR8 and PR9 allocations and presents evidence demonstrating the following:
 - No consideration has been given to the existing pedestrian level crossings north and south of Sandy Lane. If these crossings are closed, as is likely to be the case if the allocation sites come forward, this will have a significant detrimental impact in terms of site accessibility and will lead to significant severance for those who currently use the routes;
 - The PR8 and PR9 allocations have poor cycle accessibility in relation to the centre of Oxford and the city's main employment areas. This fact is acknowledged in the Transport Assessment work that has been undertaken in relation to the proposed allocations;
 - No work has been undertaken to assess the feasibility or desirability of a railway station within allocation PR8. The station does not form part of the Local Transport Plan and any such provision would either provide a very limited service or would lead to significant conflict with the wider transport strategy;
 - The closure of Sandy Lane will lead to existing residents, who access local facilities by car via Sandy Lane, being diverted onto the A44 and the A4260 since walking and cycling do not offer realistic alternatives for the vast majority of these existing trips. The closure will also lead to significant numbers of new indirect and lengthy vehicle trips between the allocations and Kidlington, the closest higher order settlement because the allocation sites do not lie within a reasonable walking distance of Kidlington.