



BECKLEY AND STOWOOD
NEIGHBOURHOOD PLAN 2011-2035
EVIDENCE BASE 2
SECTION 2.11- 5.4
SUBMISSION VERSION
DECEMBER 2022



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EVIDENCE BASE 2. BECKLEY AND STOWOOD NEIGHBOURHOOD PLAN

2.11. CHARACTER AND HERITAGE

2.11.1 Views and Vistas

Beckley village stands on a limestone ridge rising to 140 metres - overlooking the surrounding countryside – Otmoor to the north, Brill to the north, north east, the Stokenchurch cutting on M40 to the south east, Shotover to the south, south east and Didcot to the south west. In fact, there are spectacular views from anywhere along the limestone ridge in every direction, only limited where woods and trees obscure longer sight lines.

The 'Views from Beckley' map over the page attempts to show the extent of some of the long-distance views outside the Parish and Neighbourhood Plan Area, where this is possible. The numbers on the map correspond to photographs of the views in this chapter. All views and photographs have been taken from public view points, and not private land, in most cases from roads, but also from footpaths and bridleways.

The views are shown in photographs in this chapter and are listed here and correspond with the numbers on the map. All views are long-distance for many miles e.g., View 6 is approximately 25 miles.

View 1. Beckley High Street to the north across Otmoor

View 2. From Church Street and the bridleway which continues it north across Otmoor. There are also similar important views from the churchyard across Otmoor

View 3. From the Woodperry Road north across Otmoor

View 4. From Shotover towards Beckley north west to the communications mast and Stowood and from Stowood (B4027) to Shotover

View 5. From the Woodperry Road towards the village of Brill

View 6. From Stowood (B4027) south to Didcot

View 7. From Stowood south east to the M40 Stokenchurch cutting

View 8. From Common Road north west across Otmoor. There are also similar important views from the churchyard across Otmoor.

Shorter views within areas of the parish are –

View 9. Beckley High Street

The Parish has an important number of views and vistas that need to be preserved against future development especially from the top of the hill where Beckley and Stowood village is built, but also not forgetting the views of the countryside from within Oxford city. There are spectacular views from Beckley ridge north towards Otmoor from the Conservation Area and to Brill and towards Aylesbury from Woodperry Road and from Stowood to Didcot and the Stokenchurch cutting. These views are important and are shown within the Parish in Figure 2.11.1 and must be preserved at all costs.

VIEWS FROM BECKLEY

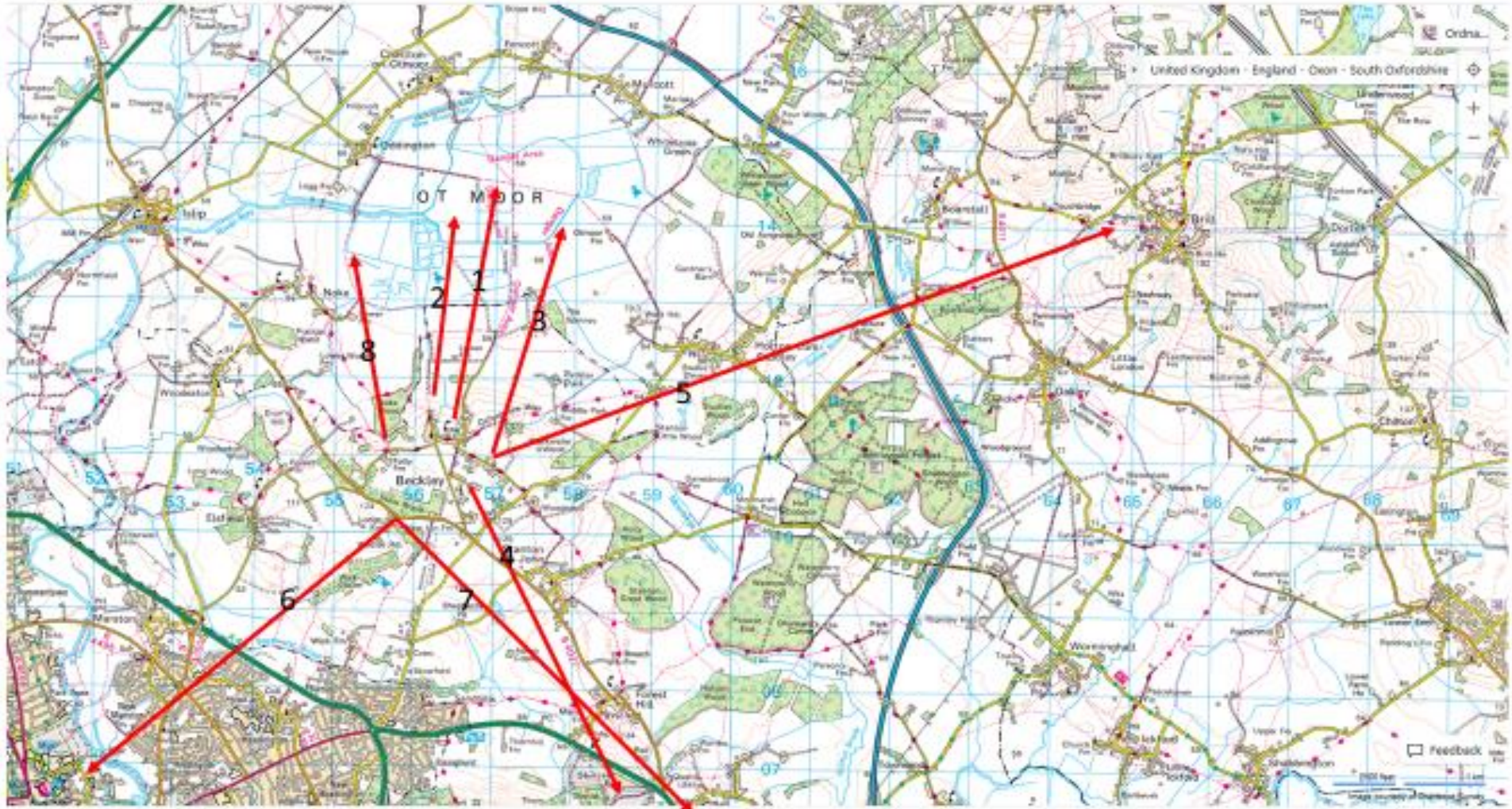


Figure 2.11.1.1. Beckley village stands on a limestone ridge rising to 140 metres - overlooking the surrounding countryside – Otmoor to the north, Brill to the north, north east, the Stokenchurch cutting on M40 to the south east, Shotover to the south, south east and Didcot to the south west. (The numbers correspond to photographs of the views in this chapter.)



View 1. From the High Street Across Otmoor



View 2. Across Otmoor from Church Street



View 3. Across Otmoor from Woodperry Road

To the south from Stowood there are views across the Stokenchurch cutting on the M40 and to Didcot and the power station and across parts of Oxford. These views a very important asset to the Parish that residents say must be preserved.



View 4. Beckley from Shotover showing Beckley Transmitter

From Woodperry Road there are magnificent views towards the village of Brill.



View 5. Misty View from Woodperry Road to Brill



View 6. From Stowood to Didcot



View 7. From Stowood to Stokenchurch Cutting

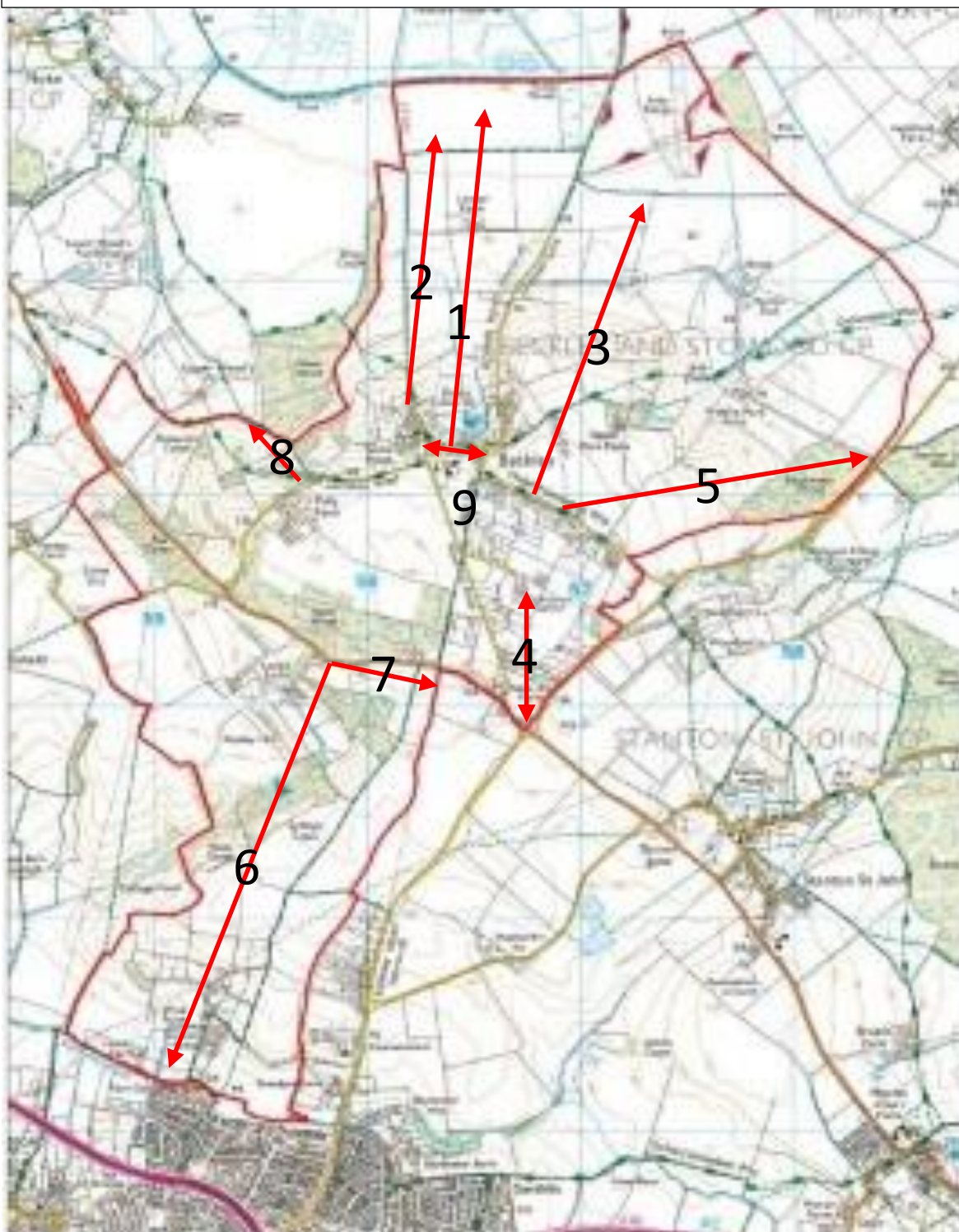


View 8. Across Otmoor from Common Road



View 9. High Street Beckley

FIG 2.11.1.2. BECKLEY AND STOWOOD VIEWS MAP CONFINED TO THE PARISH BOUNDARIES



2.11.2. Dark Night Skies

2.11.2.1. The Neighbourhood Plan area is characterised by a lack of street lighting and the darker areas of night sky are noticeably more obvious towards the north of the Parish, top the north of the ridge and adjacent to Otmoor, which has virtually no illumination at night. The atmosphere and character is very tranquil and leads to a strong feeling of remoteness during the evenings.

2.11.2.2. This means that the Neighbourhood Plan area offers residents and visitors the opportunity to see stars clearly at times without excessive skyglow from nearby Oxford to the south.

2.11.2.3. Evidence from the www.lightpollutionmap.info website shows a relatively good level of visibility at night time with radiance levels typically between 0.25 and 1.5 10^{-9} W / Cm^2 sr, in the northern part of the Parish and in the region of 10 10^{-9} W / Cm^2 sr in the far south on the edge of Oxford. The photograph below demonstrates the general levels of light pollution to the rural north east of Oxford:

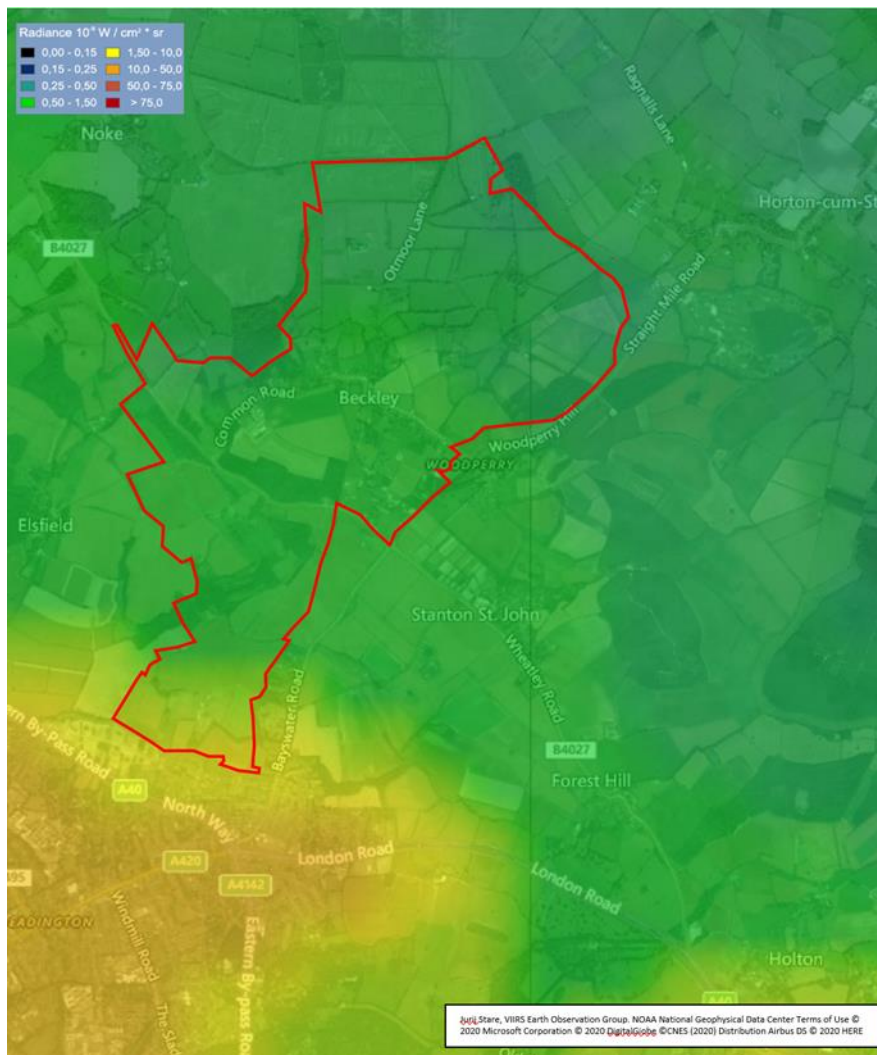


Figure 2.11.2.1. LIGHT POLLUTIONS LEVELS FOR BECKLEY AND STOWOOD PARISH¹

¹ source: www.lightpollutionmap.info

2.11.2.4. Evidence from the CPRE's online mapping website, England's Light Pollution and Dark Skies, echoes this, indicating that Beckley and Stowood Parish as a whole enjoys low levels of light pollution (between 0.25 and 1 nanowatts / cm² / steradian across most of the Parish) and consequentially enjoys relatively dark skies at night, especially again in the northern and central parts of the Neighbourhood Plan area, as the Dark Sky map for Beckley below demonstrates:

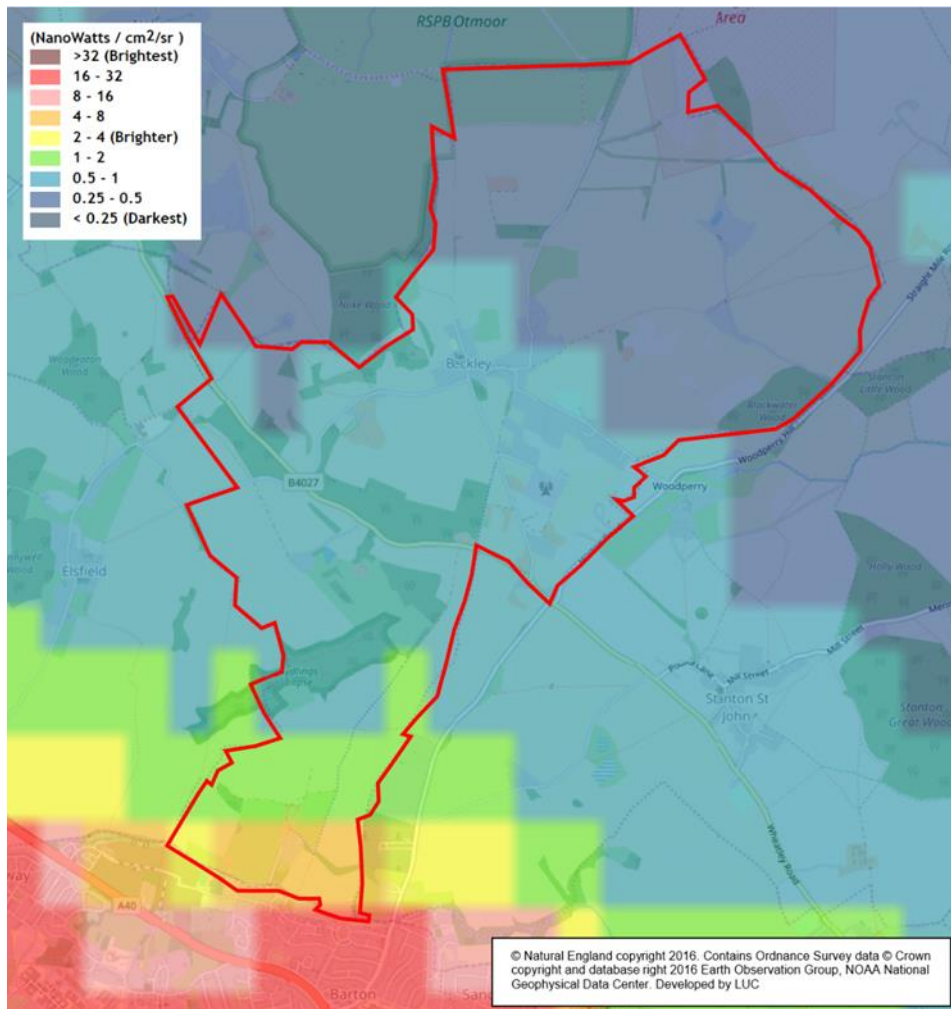


Fig 2.11.2.2. DARK SKY MAP FOR BECKLEY AND STOWOOD PARISH

2.11.2.5. Dark night skies are highly beneficial to professional and casual astronomers as well as stargazers. Dark skies also contribute to the character of the Parish at night. Those who live in a 'dark environment' often notice the cycles of the Moon and the influence this has on the ability to navigate footpaths and pavements etc at night more keenly.

2.11.2.6. In the community consultation on the Beckley design guide 77% of respondents agreed that - "Outside lighting on buildings should be fully shielded to direct light downwards to prevent light pollution" (question 12.) see Appendix 21.

2.11.3. Heritage

The National Heritage List for England has 45 listed building entries for the Parish, one scheduled monument and one Grade II* Registered Historic Park and Garden. Please see Appendix 4.} for a list of all the listed properties.²

Of the listed buildings two are Grade I - of Church of the Assumption of the Blessed Virgin Mary and Beckley Park. Both are discussed in more detail in the History Section 2.3. Beckley Conservation Area contains 24 listed buildings and Beckley Parish surrounding the village containing a further 15 listed buildings.

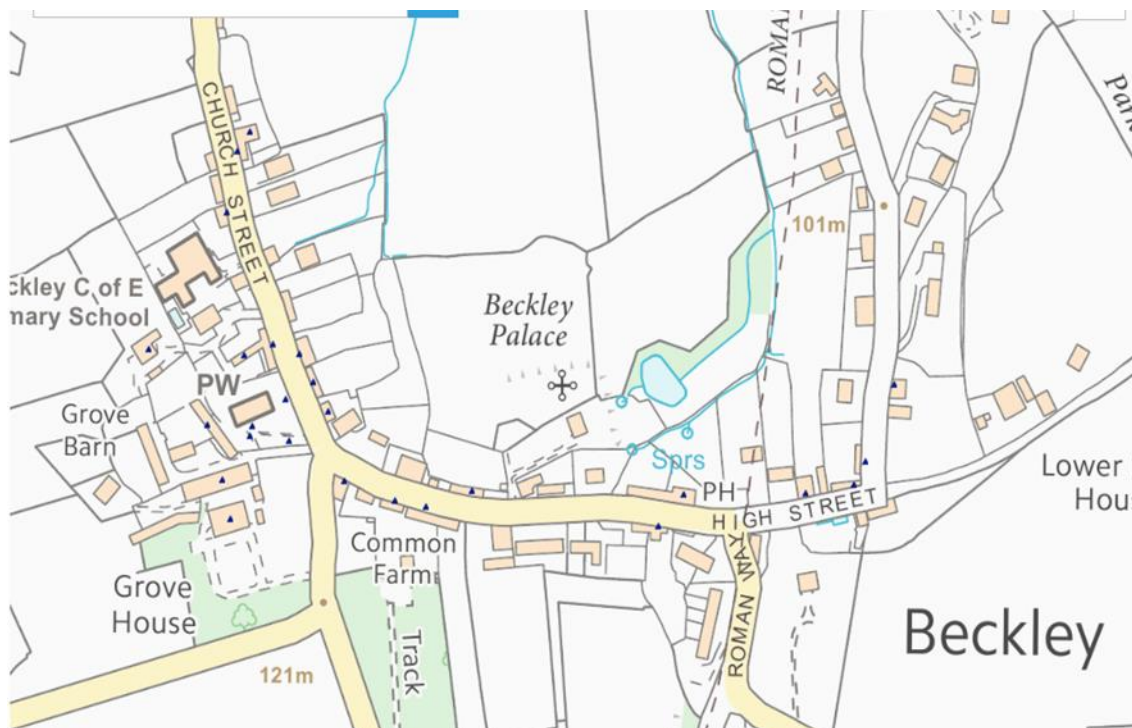


Figure 2.11.3 THE LISTED BUILDINGS IN THE BECKLEY CONSERVATION AREA

Wick Farm

There are 5 listed buildings at Wick Farm - Wick Farm house, the old barn behind the well house, and the two sets of gate pillars are all listed grade II, while the well house itself is listed Grade II*. The old barn and Well House³ are in disrepair and need restoration. The Well House is on the 'at risk register'.⁴

Scheduled Monuments

The scheduled monument is "Two sections of a Roman road on Otmoor", which were scheduled in 1997. This road runs through the Parish from Alchester in the north to

² English Heritage

³ <https://historicengland.org.uk/listing/the-list/list-entry/1047637>

⁴ Barn Listing- <https://historicengland.org.uk/listing/the-list/list-entry/1369220> , 1047637 – well house, farmhouse – 1047636 and gate piers – 1047638 and 1369181

Dorchester. The two sections of Roman road are among the best preserved sections of the road.⁵

The Grade II Registered Garden and Park is at Beckley Park.

Other Heritage Sites

As well as the listed buildings and monuments mentioned above there are other heritage sites within the Parish -

1. Beckley Palace – site of a Norman palace
2. Roman Villas – sites –
 - a. “At Beckley by the Roman road, looks northwards over Otmoor and possibly another stood by a stream at Woodperry;”
 - b. another is at Headington on the banks of the Bayswater Brook”⁶ This is north of Wick Farm.
3. Roman Roads cross the Parish
4. Beckley Conservation Area containing 24 listed buildings -see Appendix 4 for list and map
5. Beckley Parish surrounding the village containing a further 15 listed buildings

⁵ <https://ancientmonuments.uk/113380-two-sections-of-a-roman-road-on-ot-moor-beckley-and-stowood#.Xdk0Snd2ucw>

⁶ <https://www.british-history.ac.uk/vch/oxon/vol1/pp306-324>

2.11.4 Character Assessments of The Parish

Character Assessments have been carried out for the Parish. It has been split into four areas as indicated on the map over the page –

1. The Conservation Area of the older part of Beckley Village
2. The Woodperry Road area bounded by Woodperry Road, Sand Path/Roman Way, New Road and the Horton Road
3. Wick Farm, including Lower Farm
4. Outer Areas not included elsewhere including Stowood and the farms

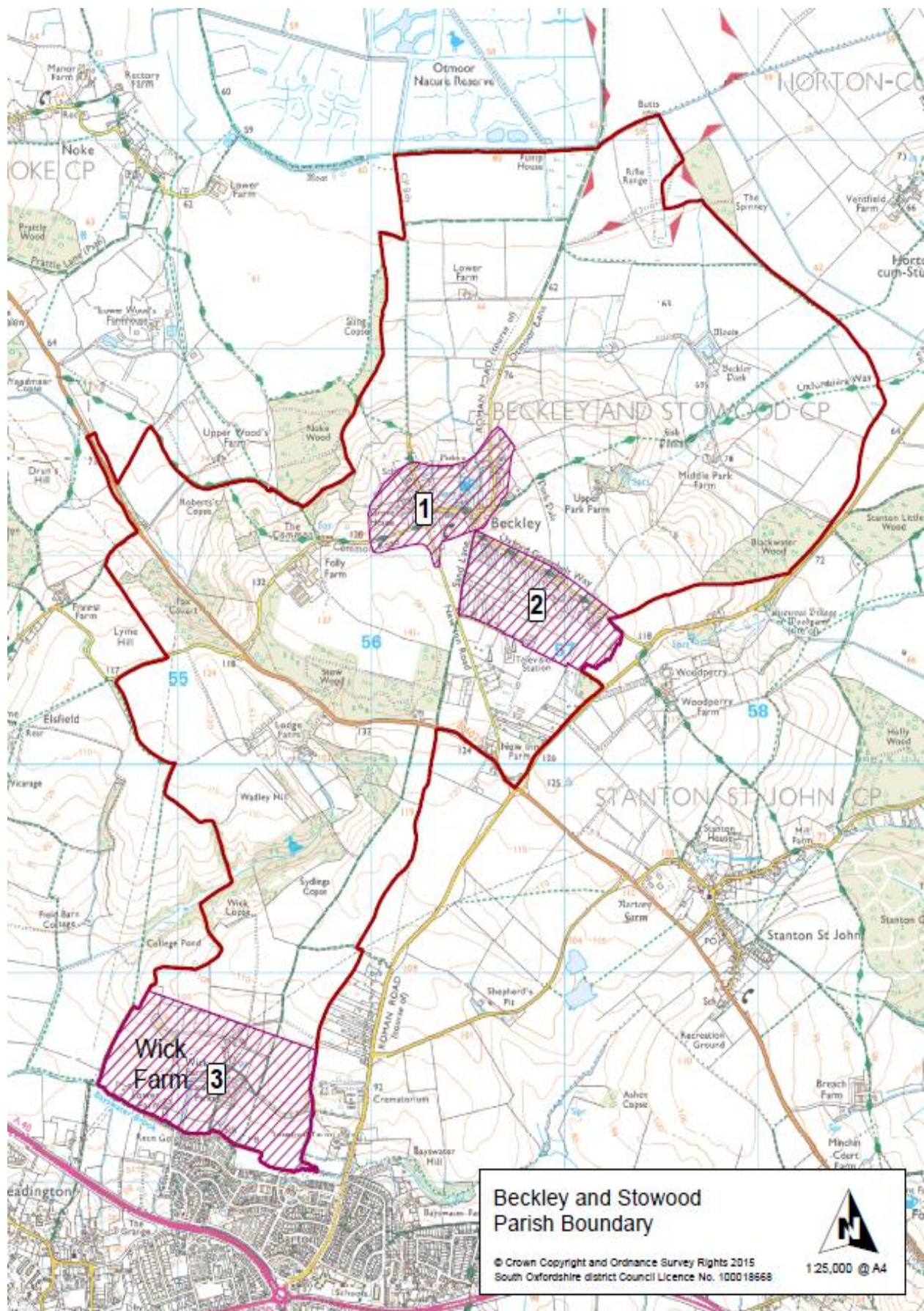


Fig 2.11.4. MAP SHOWING THE FOUR CHARACTER ASSESSMENT AREAS OF THE PARISH

2.11.5. The Beckley Conservation Area



Fig 2.11.5. BECKLEY CONSERVATION AREA MAP

As the old part of Beckley is a conservation area there is an appraisal dated 26th June 1998 which can be found in Appendix 12.

Summary of Conservation Area Appraisal

"Beckley is a linear hilltop village, its ancient route-ways straddling a 300–400-foot ridge overlooking the 4,500 acres of the original Otmoor. The location of St. Mary's Church at the western end suggests that this part of the village was settled first and then spread eastwards along the ridge."

Many of the original buildings are of limestone quarried locally and most would have originally had thatched roofs, most of which have now been replaced with tiles. Houses are separated in many places by stone walls and front gardens, which although small as buildings are near the road add significantly to the appeal of the village.



View 9. High Street Beckley

*“There are few buildings in Beckley of outstanding architectural merit although the parish church of St. Mary is essentially a 14th century structure with later alterations and contains important early stained glass and wall paintings. Beckley Park and Woodperry House [outside the Parish] lie outside the village but are both very important buildings. Within the village Cripp' s Cottage in Otmoor Lane and Alflyn in Church Street are perhaps the oldest secular buildings and date from the 16th century. The 18th century Grove House and the 19th century primary school are substantial buildings but, while many houses are listed none is of truly outstanding architectural merit. **It is important to appreciate that it is the village as a whole which makes the strongest architectural impact.** The reasons for this are subtle but of great importance from a planning and conservation point of view. ”*



View 2. Church Street to Otmoor

Gardens and Boundaries

An important aspect of the Conservation Area – the old part of Beckley village, not covered in the Appraisal is gardens and boundaries. Gardens form a very important part of the visual impact of Beckley village. In Church Street the front gardens are well planted and great pride is taken in a good floral display. Some only have space for a single flower bed, but these are well-tended. There are no pavements in Church Street and some houses have small verges. These are an important aspect of the village. In the High Street, the older houses have smaller front gardens, being built nearer the road. Nevertheless, where possible these are well tended, giving a wonderful display, especially the large bank in front St Tinniver's. The High Street is the only road with a pavement in Beckley, but even then, there are verges, in some places.

The boundaries of houses in the main are stone walls, which add greatly to the scene.

In Otmoor Lane there are newer houses going down the hill north and the boundaries are mainly hedging and larger front gardens filled with flowers. This gives a very green aspect to the lane, with important verges along the road.

Areas for Improvement – Recommended by the Conservation Area Assessment

1. To lay underground cable instead of overhead wiring. The neighbouring village of Stanton St John did this and it improved the appearance of the village considerably. [see picture of Church Street below and over page and the recommendations from the Conservation Area Assessment in blue.]

"The most important and dramatic improvement would be the laying underground of the existing overhead cables and wires by the statutory undertakers. These wires are particularly prominent in Church Street where they interrupt several attractive views. The work would, however, have to be carried out in a manner that does not destroy or damage other important amenities such as grass verges and banks or granite kerbs."



View 2. Church Street to Otmoor

Church Street in Beckley's Conservation Area

2. A coordinated scheme for the design, painting, fixing and siting of street furniture could also be considered.

"Street furniture plays a vital role in the character and appearance of an area and the quality of items such as road direction signs, street name-plates, notice boards, litter bins and seats could all be improved. This includes the method of fixing of several of these items to poles, posts and walls, which is often crude and unattractive. A coordinated scheme for the design, painting, fixing and siting of street furniture could also be considered."



High Street Sign

3. A tree management scheme needs to be discussed with landowners in order to restore this important part of the character of the village.

"The management of the natural environment in collaboration with landowners is an important way of maintaining and enhancing the character of an area. Consideration should be given to the encouragement of tree management and planting in order to check, and if necessary, fell overgrown, intrusive and unwanted trees and to plant new ones where appropriate. Important vistas must be maintained and thought given to creating new ones. In the past twenty-five years the disappearance of many large elms and the haphazard growth of other species have emphasised how quickly and completely the landscape changes. In the past, the willows in the fields below Church Street were regularly pollarded, thus keeping open attractive views out towards Otmoor, but these are now blocked. A tree management scheme needs to be discussed with landowners in order to restore this important part of the character of the village."

4. Regular maintenance of the village pond to cut back overgrown trees and remove weeds. Placing a seat nearby.

"There is a potential area for enhancement around the pond and spring by Chapel Cottage. This feature is rather overgrown and may not even be noticed by casual passers-by. There is a danger in over restoring such a feature, however, as it is not the location for an ornamental landscaped village pond, but it would benefit from more regular maintenance such as the removal of weeds and possibly more landscaped planting. A strategically placed wooden seat would enable people to rest and appreciate the pond and its attractive setting."



Beckley Village Pond

5. The use of traditional materials and detailing can have considerable effect in enhancing an area's character. Owners of historic buildings are encouraged to remove unsympathetic modern materials such as concrete tiles, u.P.V.C. windows and plastic rainwater goods, and reinstating traditional materials such as clay tiles, softwood windows and cast-iron guttering.

"The use of traditional materials and detailing can have considerable effect in enhancing an area's character. The great majority of buildings in the village are privately owned and therefore the owners of prominent and historic properties are encouraged to assist in improving the street scene by removing unsympathetic modern materials such as concrete tiles, u.P.V.C. windows and plastic rainwater goods, and reinstating traditional materials such as clay tiles, softwood windows and cast iron guttering. The owners of thatched buildings are also encouraged to retain or reinstate plain, flush ridges, which are part of the traditional thatching style of South Oxfordshire. This has recently been carried out at several cottages including 2 and 3 Church Street and Cripps Cottage in Otmoor Lane where the simple flush ridge detail is once more an essential part of the attractive street scene."

"Small amounts of financial assistance may be available in some instances from the Council for the repair and renovation of historic buildings within the conservation area and the reinstatement of lost original details and materials. Grants may also be available for appropriate schemes of environmental improvement."

In summary, it is very important to retain the outstanding views to and from the Conservation Area' in Beckley and indeed in the whole village. If there is any building or infilling it should be sympathetic with the rest of the area. There is criticism of some of the newer houses that they detract from older buildings. This is particularly important as the Appraisal states –

"It is important to appreciate that it is the village as a whole which makes the strongest architectural impact."

While there is a mixture of building materials and styles the older buildings are limestone, originally with thatched roofs, many having been converted tiles.

1. Underground Cabling

The residents of Church Street have been active in trying to get rid of the very unsightly overhead cables in Church Street at great personal cost.

The work to bury the electric cables in the lower part of Church Street took place in 2009. The cost was over £24,000, which was split equally between nine households. Not every household contributed to the cost. The work to bury the electric cables in the upper part of Church Street took place in 2011. The cost was nearly £15,000, which was split between four households. Those households also incurred additional costs of £4,040 for trench work. There may be a legal requirement to replace existing overhead telephone cables with an underground conduit to every household irrespective of whether or not that household is currently connected to BT. The estimated cost to remove all the telephone poles and overhead cables in Church Street the cost was around £3,000 per household. At that time, a number of households were unwilling to contribute. However, approximately 50% of households have switched from BT to cable from Gigaclear and this may assist at finally getting rid of the overhead cables. BT has proved remarkably unhelpful and expensive in this matter.

4. The Village Pond

The Parish Council does carry out routine maintenance of the village pond and there is a current programme to clear and clean it.

The other 'Areas for Improvement' can be reviewed by the Parish Council.

A very important aspect of the Character Appraisals states –

“It is important to appreciate that it is the village as a whole which makes the strongest architectural impact. The reasons for this are subtle but of great importance from a planning and conservation point of view.”

This places great importance on ensuring that any building is sympathetic with those already there and is also constructed of local materials and of local design.

2.11.6. Woodperry Road and New Road Area – Character Assessment

This area is bounded by Woodperry Road (shown below as the Oxford Greenbelt Way), Sand Lane/Path/Roman Way, New Road (the small road to the mast) and the Horton Road.



Fig 2.11.6. ORDNANCE SURVEY MAP OF THE WOODPERRY AREA

There are views from various points in the village which are important in creating the special character of the place. Equally there are important views into the village from points outside which, were they to be significantly altered, would also damage the visual aspects of the rural character of the village.



View 5. Misty View from Woodperry to Brill

The quality of these views needs to be judged alongside the built environment as well as the landscape itself.

- At first sight, the housing along Woodperry Road is typical example of single sided, uncontrolled ribbon development consisting of unremarkable, mid-to-late 20th Century, domestic architecture. Many of the earlier houses have been replaced in recent years by

larger houses in the more modern idiom. Taken together, there is now an eclectic mix of housing styles which gives a changing variety of views progressively along the road. Nowhere is this more clearly seen than from the far side of the Recreation Ground and from the Public Footpath on the other side of the open field fronting the western part of Woodperry Road. From this perspective, the view into the village has a quality and charm which characterises this part of the village and should be vigorously defended and preserved.

- Equally is the very important view to the north from Woodperry Road, looking over Otmoor to the Church Tower of Charlton-on-Otmoor and the distant horizon far beyond. This is a view of the highest quality and importance and must be preserved.
- There are important glimpses of this view to be had looking north from Roman Way, which would be lost if any development were to be allowed to interrupt that vista.
- Skyline development should always be avoided so that, for example, the view in the opposite direction, southwards up Roman way from the High Street is preserved as part of the rural charm of the village. Similarly, any skyline development to the south of the High Street should be avoided so as not to over dominate and overwhelm the clustered character of the centre of the village.
- The view northwards over Otmoor from the garden of the Abingdon Arms is very valuable and should be preserved and enhanced in the long term.

The full Character Assessment can be found in Appendix 13.

The original houses were predominantly bungalows and although many have been enlarged or replaced all the houses have pitched roofs, mainly tiled. There is only one exception with a flat roof, which is not in keeping with the other village houses.



Bungalows in Woodperry Road

Originally there were 1-storey bungalows, many are now chalet bungalows or 2-storey houses. Looking at roof line some have built sky lights into the roof, but one newer house is much higher than the others with 3-storeys and while one is built into the roof it is much higher than all the surrounding houses over-powering and over-looking them. It detracts from the village style and would possibly be more in keeping in an up-market sea-side development.



Roofline along Woodperry Road

Most of the houses are brick, natural stone or timber cladding. Again, one house differs and is not in keeping with the rest, although all new developments are supposed to be in-keeping with the those surrounding it. Generally, those with pitched, tiled roofs, constructed of natural materials – brick, stone, render or wood are felt to be keeping, while coloured cladding, flat roofs and pillars are felt to better fit in towns and seaside developments.

Roads

Woodperry Road is just wide enough for two cars to pass, so it is very important that there is no parking on the road and there is sufficient space for cars to park in their own driveway.

New Road is very narrow with insufficient width for two cars to pass along most of the length of this road, so it is even more important that all cars are parked in their own driveway.

Sand Path at its southern end and along most of its length is a single track, where there is insufficient room for pedestrians and cars to pass each other. Pedestrians have to climb onto the verge. Further north, when this track becomes a road and is named Roman Way it is metalled and wider as it nears the pub, but this is a dangerous bend.

Development Potential

There is little development potential along the Woodperry Road itself, unless existing houses are demolished and replaced by those of a much higher density, which would detract significantly from the rural look of the village and is to be discouraged.

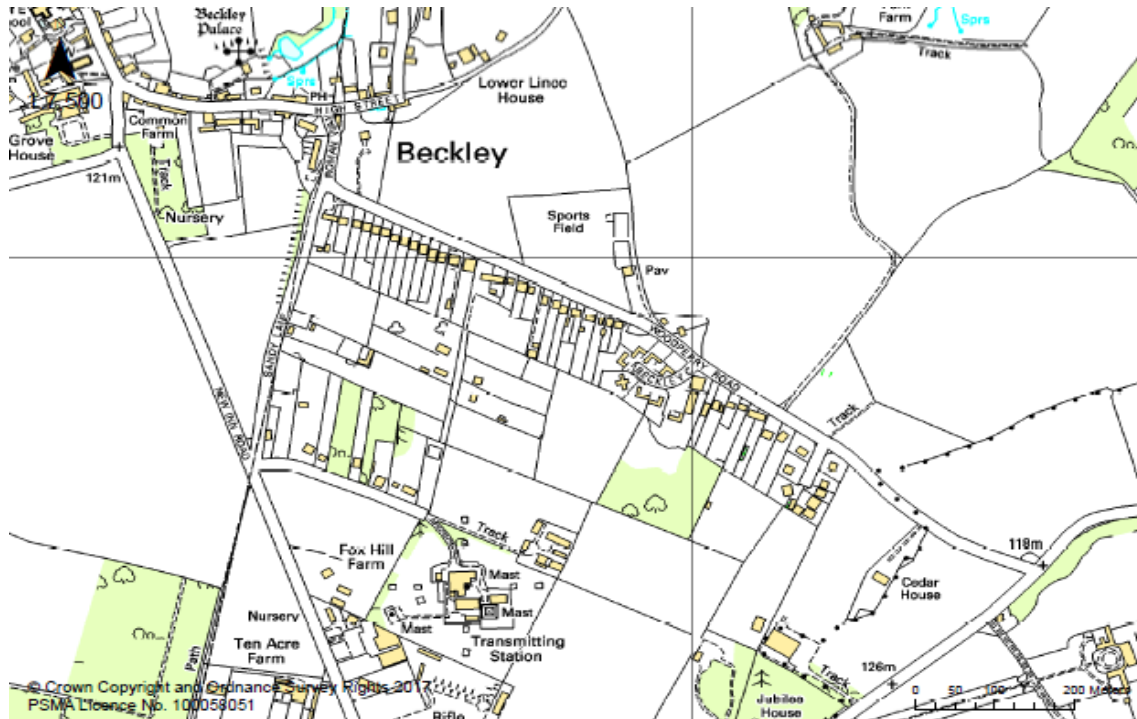
There is a track that leads from Woodperry Road south with 3 current houses, another two with planning permission and some fields, one with old cars in it. There is potential to build a few discrete houses without adversely affecting the rest of the village.

There are at least 2 building plots in New Road shown below in green, which were designated plots before the Green Belt was imposed. All development is subject to Green Belt legislation.

Planning applications where the Green Belt has been a significant factor –

- P18/S2776/FUL - Sandy Acre Woodperry Road Beckley - Erection of replacement dwelling house to provide four bedroom family home with detached garage. This application was for a replacement dwelling in the Green Belt whose volume was greater than the existing – Decision notice – *“The NPPF advises that replacement buildings are appropriate where they are in the same use as the existing building and*

do not result in buildings which are materially larger than the one it replaces. In this case, although the use would remain the same, the additional volume created by the new dwelling and detached garage building would result in development which would be materially larger than that existing. This would be harmful to both the openness and visual amenity of the Oxford green belt.” - http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197350956&CODE=9024EED9D80B191AC8DEA1DCD860E209



New Road and Woodperry Road

2.11.7 Wick Farm and Lower Farm

The Full Character Assessment can be found in Appendix 14.

Wick Farm is reached through the Barton housing estate on the north-eastern edge of Oxford City. This is an area of dense housing and there is a large development being built at Barton West (Park) next to the existing Barton estate backing onto the Bayswater Brook. The Parish Boundary which separates Barton, part of Oxford City and the Parish of Beckley and Stowood is the Bayswater Brook. This was also used to mark the very important boundary of the Oxford Green Belt, until the land for the development of Land north of Bayswater Brook was removed from the Green Belt when the SODC Local Plan was adopted. The brook floods regularly along its course.



The Bayswater Brook – The Former Southern Parish Boundary

Lower Farm and Wick Farm are approached along Barton Village Road. Instead of dense housing the first view is of green fields, hedgerows and trees stretching up the hillside northwards towards Beckley village. There are a few dilapidated remnants of farm equipment and old sheds, but the overall view is of green pastures.



Wick Farm Looking Up Hill North Towards Beckley

Turning left off Barton Village Road there is a track over the Bayswater Brook to Lower Farm. This has been developed into a farm house and the barns behind it into 3 houses, all in local stone and surrounded by green fields. The fields are not well maintained.



Lower Farm Houses

Turning back into Barton Village Road and driving east approximately two fields along the road turns sharp left (north) over the Bayswater Brook again and up a pleasant tree-lined drive with fields to left (west) and a wood to the right. The road then opens up onto Wick Farm. On the right is a very well kept mobile home park with approximately 52 mobile homes.



Wick Farm Mobile Homes

Ahead is an impressive old stone gateway which is listed, a number of stone barns used for four car repair businesses and the Farm House. Behind the farmhouse is a listed well house, which is at risk and a very fine large barn now in disrepair, which converted would make a very attractive home or office premises. Behind this is some farm machinery which seems to be more modern.



Wick Farmhouse



Wick Farm Great Barn in Disrepair



Other Barns at Wick Farm – Used for Car Businesses



Small Barn at Wick Farm – Car Repair Business

The initial reaction when coming from the Barton estate is a welcome view of green pastures, hedgerows and trees stretching ahead, even if the fields are not well tended and do not appear to be farmed.

Lower Farm is attractive and well maintained. Wick Farm mobile home park is well maintained and most have well maintained gardens.

Wick Farmhouse itself and the barns surrounding it look unloved and in a state of disrepair. They could be very attractive if repaired and converted. Undoubtedly the proximity to and approach through the densely built Barton estate detracts from Wick Farm, but does provide residents with shops, a GP surgery and school and a bus service every 10 minutes into Headington and Oxford.

Development Potential

There is development potential to convert and renovate the large barn at Wick Farm and some of the old farm buildings. There was a planning application in 2012 to convert the large barn behind Wick Farm House.⁷ The application was withdrawn and it is believed that this may have been due to the fact that it was likely to be refused.

Conversion of this large barn and other barns would save the buildings and make useful housing or commercial premises.

The Full Character Assessment can be found in Appendix 14.

7

<http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P11/W2263/LB#exactline>

2.11.8. Outer Areas

The Character Assessment of the Outer Area can be found in Appendix 15.

The Outer Area 3 comprise the houses and farms outside Wick farm and Beckley village. Most of the housing plots are large (at least ¼ acre) and some much larger. There are some semi-detached houses, but most are detached. None are terraced. Along the B4027 at Stowood there is a mix of former inns and farm buildings, many listed and built in stone. On Common Road, there is Folly Farm with a range of farm buildings and barns and older stone cottages, that may once have been buildings for farm workers. On the Horton Road buildings are generally built of brick with large plots. Houses are mainly surrounded by hedges or stone walls. New Inn Road has newer buildings, mainly bungalows and former farms.

Otmoor – the lower area of Otmoor Land north of the conservation area is mainly farm land with a farm house and barn conversion – Lower Farm and Old Lower Farm House. It has spectacular views across Otmoor a marshy area where the RSPB has established a bird reserve. There are also wonderful views from here into Beckley village and from Beckley across Otmoor.



View 2. To Lower Farm and Otmoor

The B4027 is a very busy road and a main HGV route. There are no pavements and walking on these roads is difficult and dangerous as there are no paths, as is cycling.

Buildings

There is a mixture of old listed farm buildings and inns along the B4027. Most are built of stone and some thatched. They are mainly detached in large plots with hedges or stone walls surrounding. There are a few semi-detached properties, some bungalows, but no terraced houses. Newer houses date from post war with a few newer ones, which have been rebuilt.

Views

This is an extremely important feature which must be preserved at all cost. This area is on a high ridge and views to and from it are superb. The views from the south from Oxford and Wick Farm for a green verdant backdrop to the city of Oxford and residents of Wick Farm and Barton. Views from Stowood are as far at Stokenchurch cutting on the M40 and Didcot power station, with beautiful countryside in between.



View 6. From Stowood to Didcot

From Common Road and across Otmoor there are magnificent views for miles both to and from the area. These views of fields and woods must be preserved.



View 7. From Stowood to Stokenchurch Cutting



View 8. Across Otmoor from Common Road

Development Potential

Although it has been decided that there should be no building in fields and green field sites there are some development sites in this area which would meet the criteria decided by Parishioners. These are brown field sites.

One is the farm yard at Royal Oak Farm, which currently houses a number of small businesses in the out buildings and a former farm shop, which is now closed and has not been re-let. There are other brown field sites – The White House a former scrap yard where construction is nearing completion in autumn 2017 for 3 new homes, and a car business in an old quarry on the north side of the Horton Road behind Jubilee House, which has now been replaced by a house.

Figure 2.11.8.1. – MAP ROYAL OAK FARM AND YARD

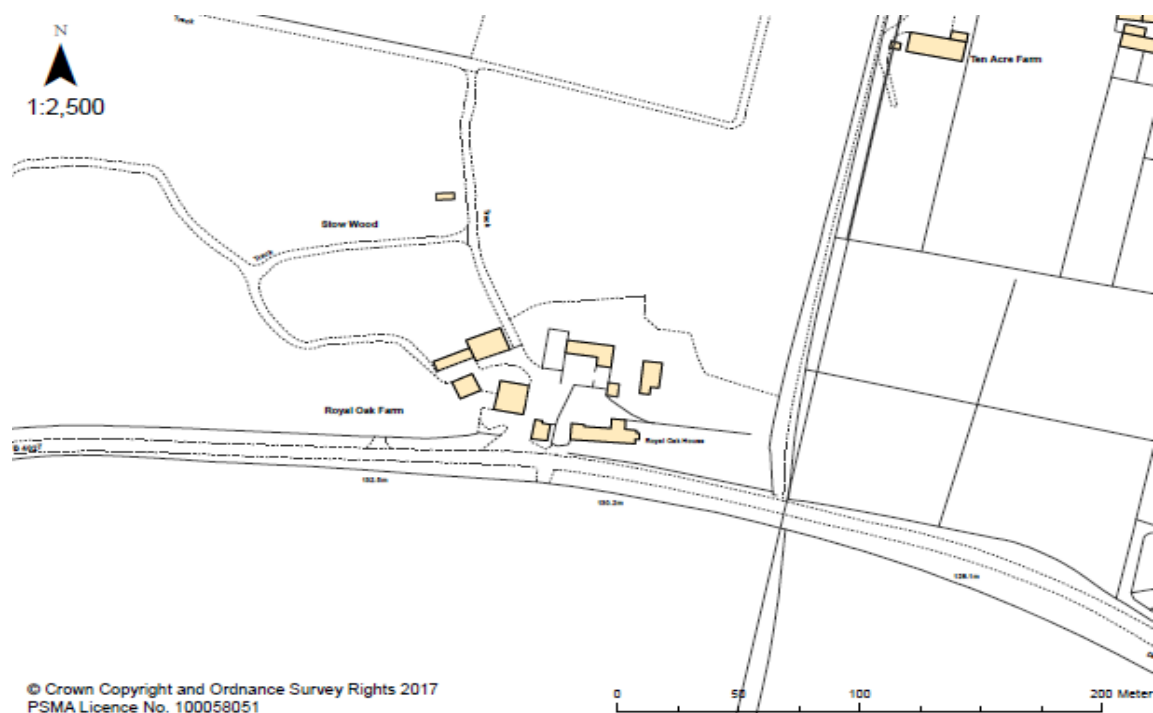




Fig 2.11.8.2. ROYAL OAK FARMYARD

2.11.9. Roads – Major and Minor

The major roads that cross the Parish - B4027, Bayswater Road and Horton Road put constraints on any development, particularly as there is little scope to increase volume of traffic.

The roads within the village of Beckley are congested and particularly in the Conservation Area, the older part of the village, as there is no space to accommodate cars as the houses were built before they were invented and so they must park in the road. Traffic congestion from the school, RSPB and MOD rifle range make the narrow, often single-track roads gridlocked.

In the newer parts of Beckley village some of the most recent developments have left insufficient space to park cars within the curtilage of the house, so there is parking on the roads, exacerbating congestion.

Any new developments, however limited, must ensure that traffic flow is not further compromised by having sufficient parking for all household cars on the property.

2.11.10. Housing Density in Beckley Village

Below is a spreadsheet showing the current housing densities in the main areas of the village of Beckley. The Public GIS site provided by SODC for planning purposes, was used to calculate the areas of houses and gardens and this was dividing into the number of houses in each area.

The housing density in the main areas of Beckley village ranges from 4.3 houses/hectare, the lowest in Otmoor Lane to 8.5 house/hectare the highest in Church Street, with an average for the village of 6.97 houses/hectare. Compare this with the New Inn Road area where housing density is lower at 3.58 houses/hectare and the Horton Road, where density is even lower at 1.43 houses/hectare.

There are other areas in the Parish where density is higher particularly Wick Farm and Lower Farm on the southern edge of the Parish nearer Oxford have high densities, as Wick Farm has a mobile home site of 52 homes and Lower Farm is an old farmhouse and barn conversion with 5 dwellings. Common Road is the next most dense. This is a small group of cottages some distance from the village centre, near Folly Farm, but this has only 7 houses, 3 farmhouse dwellings connected with Folly Farm. The other built up areas are less dense than the village centre and Woodperry Road area.

Comparing this with the former SODC Core Strategy it is considerably lower, as would be expected for a rural village at 25. The Local Plan gives an overall new density of 45 dph, but this does not appear to apply to villages such as Beckley.

Housing Densities

The SODC Core Strategy stated - Policy CSH2 Density On sites where housing development is acceptable in principle, a minimum density of 25 dwellings per hectare (net) will be required unless this would have an adverse effect on the character of the area. This has been replaced by Policy STRAT5: Residential Densities (in the SODC Local Plan 2035), but while the text mentions that 25 dph is now insufficient it gives no density target for rural parishes and villages such as Beckley with little public transport and with no near-by town. The specific density in point 3 does not relate to Beckley.

Policy STRAT5: Residential Densities

3. Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density.

However, this is to be expected as the Core Strategy and now Local Plan STRAT 5. covers the whole of the South Oxfordshire District Council area, including towns.

Outside the settlement boundary the housing density for Wick Farm has been measured as Density 26.21 dwellings/hectare, including 52 mobile homes a farm house and some barns currently used as motor repair businesses. The housing density at Lower Farm is 16.67 DWELLINGS per hectare. See Appendix 16. for the maps and details of calculations

Table 2.11.10 - BECKLEY VILLAGE HOUSING DENSITY					
	Number of houses	Hectares	Acres	Houses per Hectare	Houses per Acre
Village Centre					
Church Street	24	3.61	9.45	6.65	2.54
High Street	33	3.91	9.66	8.44	3.42
Otmoor Lane	22	4.68	11.56	4.70	1.90
Woodperry Road	59	7.33	18.11	8.05	3.26
Total	138	19.53	48.78	7.07	2.83
New Inn Road	12	3.35	8.29	3.58	1.45
Horton Road	10	7.01	17.32	1.43	0.58
Common Road	7	0.52	1.28	13.46	5.47
Wick Farm	65	2.48	6.13	26.21	10.60
Lower Farm	5	0.3	0.74	16.67	6.76

3. OPPORTUNITIES AND THREATS

3.1. OPPORTUNITIES

3.1.1. The Oxford Green Belt

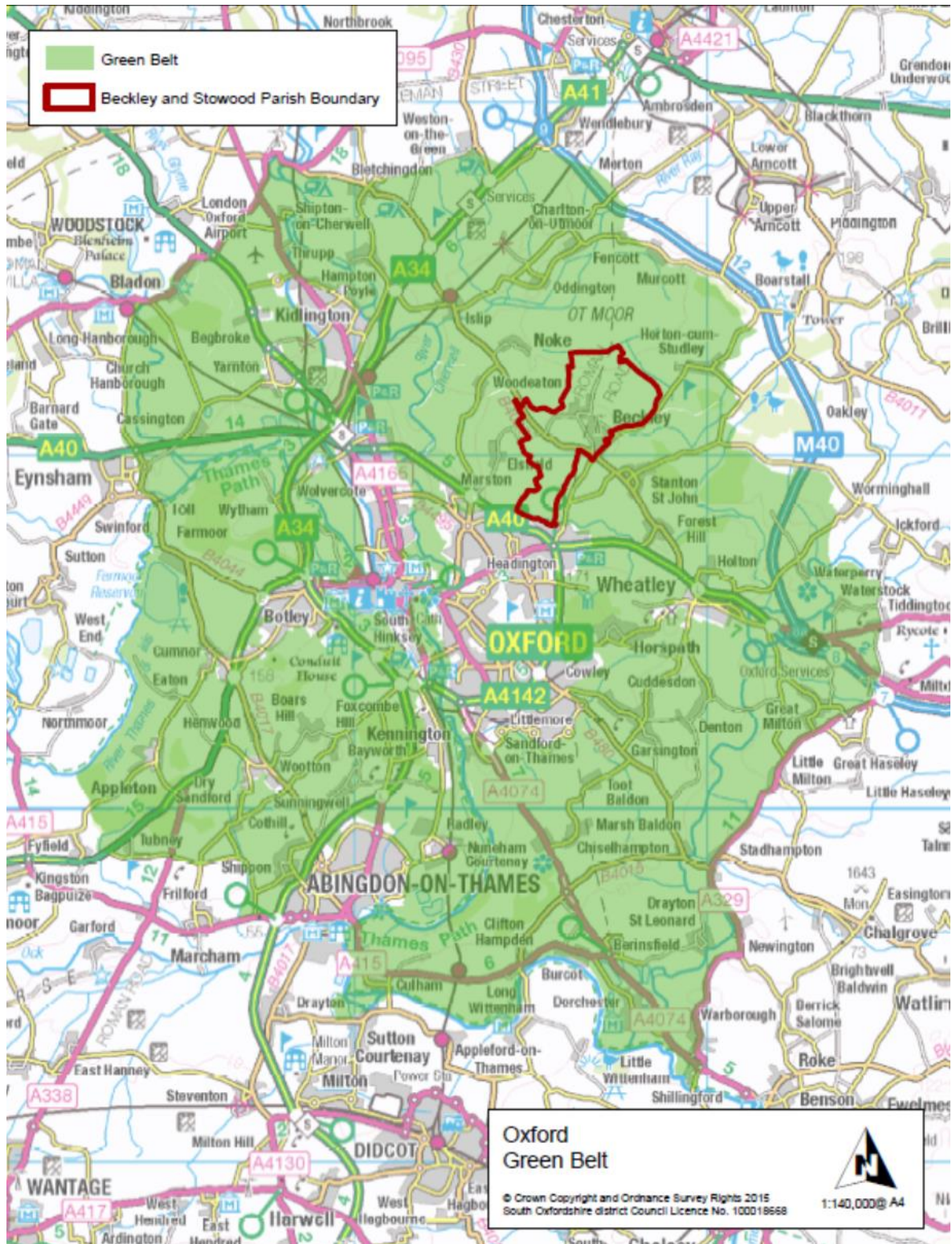


Fig 3.1.1. OXFORD GREEN BELT MAP

Beckley and Stowood used to lie entirely within or is 'washed over by' the Oxford Green Belt.

Green Belt serves five purposes:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Since the adoption of the SODC Local Plan in December '20 the land for the strategic development site Land north of Bayswater Brook covering 110 Hectares 272 acres has been removed from the Green Belt along with all the other strategic development sites in this Local Plan amounting to nearly 2,000 acres of Green Belt lost in SODC.

National Planning Practice Framework - 13. Protecting Green Belt Land

Proposals affecting the Green Belt

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- (a) buildings for agriculture and forestry;*
- (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- (e) limited infilling in villages;*
- (f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- (g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

There have been some concerns that planning permission has been given for some 'materially larger buildings' in the village of Beckley, using permitted development rights, and others submitted where there is a proposal to add more than 40% to the volume of the house as measured in 1948.

- P19/S2951/FUL - Sandy Acre Woodperry Road Beckley, Demolition of existing dwellinghouse and erection of replacement dwellinghouse to provide family home with detached garage with parking, amenity space, landscaping, and associated works <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P19/S2951/FUL>
- P20/S0407/HH Redways New Inn Road Beckley OX3 9SS Proposed single storey rear extensions, alteration to existing front bays and cosmetic changes to external envelope. <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P20/S0407/HH>

In the revision and update of the NPPF (National Planning Policy Framework in 2021 the Green Belt protection was strengthened.⁸ In particular NPPF 137 which states -

137. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. and

140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

This should have protected the Parish, to a certain extent, from developers who may wish to build at Wick Farm and many other green field sites within the Green Belt of the Parish, but did not.

However, along with other towns and villages the residents of the Parish have expressed a wish to 'do their share' and expand at a slow rate and build some new homes.

⁸ NPPF p 42 Protecting Green Belt Land -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

While the Neighbourhood Plan Steering Group cannot recommend specific sites, some suitable sites have been identified which are compliant under Green Belt legislation, would not compromise the look of the Parish and in some cases, would enhance it and help to preserve important buildings.

3.1.2. Sympathetic Design in Keeping with Surrounding

NPPF (National Planning Policy Framework) in its section 12. ***Achieving Well-Designed Places*** contains a number of policies 126- 136 seeking to enhance design and enhance and remain in keeping with the surroundings. Among these –

130. Planning policies and decisions should ensure that developments:

(a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

134. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design 52 , taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes. Conversely, significant weight should be given to:

(a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or

(b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

However, Planning Officers sometimes appear to not consider this, particularly 130 c) in preference to citing **NPPF 134 (b)**

This enables greater weight to be placed on ‘innovative design’ than being ‘sympathetic to local character and history, including the surrounding built environment and landscape setting’.

Feedback from community consultations on design (4.3) states that residents wished to avoid *“houses that were out of character with the rest of the village and houses that are overly large and modern.”* Recently there have been planning applications which the Parish Council opposed as not being in character with surrounding or adding to the overall quality which Planning Officers nevertheless supported and were approved.

Examples of approved planning applications which are considered not 'in keeping' with their surroundings –

- P18/S3705/FUL - Land North of Beckley Court Beckley Oxfordshire - Proposed new 3 bed dwelling with a flat roof; not in keeping with the surroundings and the street scene; overlooking neighbours; overdevelopment of the site with insufficient garden, and grey clad brick exterior – 3D design –
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197326277&CODE=0471B054D20C7608E302E6E17423BF46
Decision notice –
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197326262&CODE=0471B054D20C760847E7E51393CE3ECB
This planning permission was subsequently revised to include a pitched roof, more in keeping with its surroundings.
- P10/W1723- New detached house - Sandpath New Inn Road Beckley – A 3-storey house, the only flat roofed property in the parish with timber cladding and not in keeping with the surroundings 3D design -
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197339695&CODE=082B86723FE9CFE461AB2AE21DF39DFD
- P09/W0513 - Windy Ridge (Baytree House) Woodperry Road Beckley OX3 9UZ - Demolition of existing derelict building and garage to make way for a single detached family dwelling - 3 storey house with front balcony and pillars, built up to the site boundary
Site plan –
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197333459&CODE=7A46EDCA546FC9E2BDBE5A7234FB006D
3D - design
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197333460&CODE=7A46EDCA546FC9E2E57E0A7E300636D1
- P19/S4615/FUL conversion of a workshop to a house, where the Planning Officer's report paragraph 6.15 cited NPPF 131⁹ as a reason to support this application.

3.1.3. The Main Settlement Boundary of Beckley

A settlement boundary is required in the Green Belt as the NPPF states –

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

(e) limited infilling in villages;

The village boundary therefore must be defined to clarify where development can take place,

A senior SODC Planning Officer stated in a letter that *“South Oxfordshire has not historically defined the edge or boundary of its settlements. There are pros and cons of doing so and we*

⁹ Planning Officer's Report - P19/S4615/FUL

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1289551544&CODE=E5306F172599E4A1A3B4E7ED5AEC6C61

have witnessed settlement boundaries in other districts resulting in every space within the defined envelope being developed. Our preference has been to assess each case on its merits with recommendations being informed by the site history and particular circumstances.”. However, the SODC Planning Officer goes on to state that *“We have held a longstanding view that Woodperry Road is within the settlement as it is connected to the main body of the village by a continuous built up frontage.”* See Appendix 17. Letter from SODC Development Manager Planning.

There is therefore a Beckley village boundary that SODC Planning Officers currently use when considering individual planning applications. However, there has been no consultation with the Parish Council or local residents about this and where it should be. It is used by Planning Officers when considering individual planning applications and can be changed at any time, without consultation.

This has considerable implications for new planning applications, such as whether infilling can be carried out and the maximum size of any extensions. It is felt important to distinguish between the built-up area of the main village and its surrounding countryside in order to manage development proposals accordingly.

Examples of planning applications and appeals where the village boundary has been a significant factor –

- P18/S2953/O - The Beeches Woodperry Road Beckley - application for one detached dwellinghouse – Supported by the Parish Council – refused - *“the site lies outside the village of Beckley in an isolated scatter of development”* – Decision notice - http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197344898&CODE=D9439E1F7EFF4BAEEA7DD79DD93228DA
- P15/S2462/FUL - Land between 3 & 4 New Road Beckley - Proposed single storey, three bedroom dwelling with garage. Upgraded use of existing access into the site. Previous planning permission had been granted - P60/M1377 - Approved (08/02/1961) – Appeal Decision Notice – *“it forms part of a small ribbon of development outside the main settlement boundary and neither forms part of the main village itself nor can it be said to be part of an otherwise built up frontage.”* – http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1197353259&CODE=30BDF4319049DCD3C6B2914E9B79B9D3

3.2. THREATS

3.2.1. The Oxford Green Belt

As Beckley and Stowood abuts the outskirts of Oxford City, there have been a number of threats of development on the land adjacent to the Barton estate at Wick Farm and in the neighbouring Parish of Elsfield. Parishioners have been very vociferous in wanting to protect the Green Belt from development.

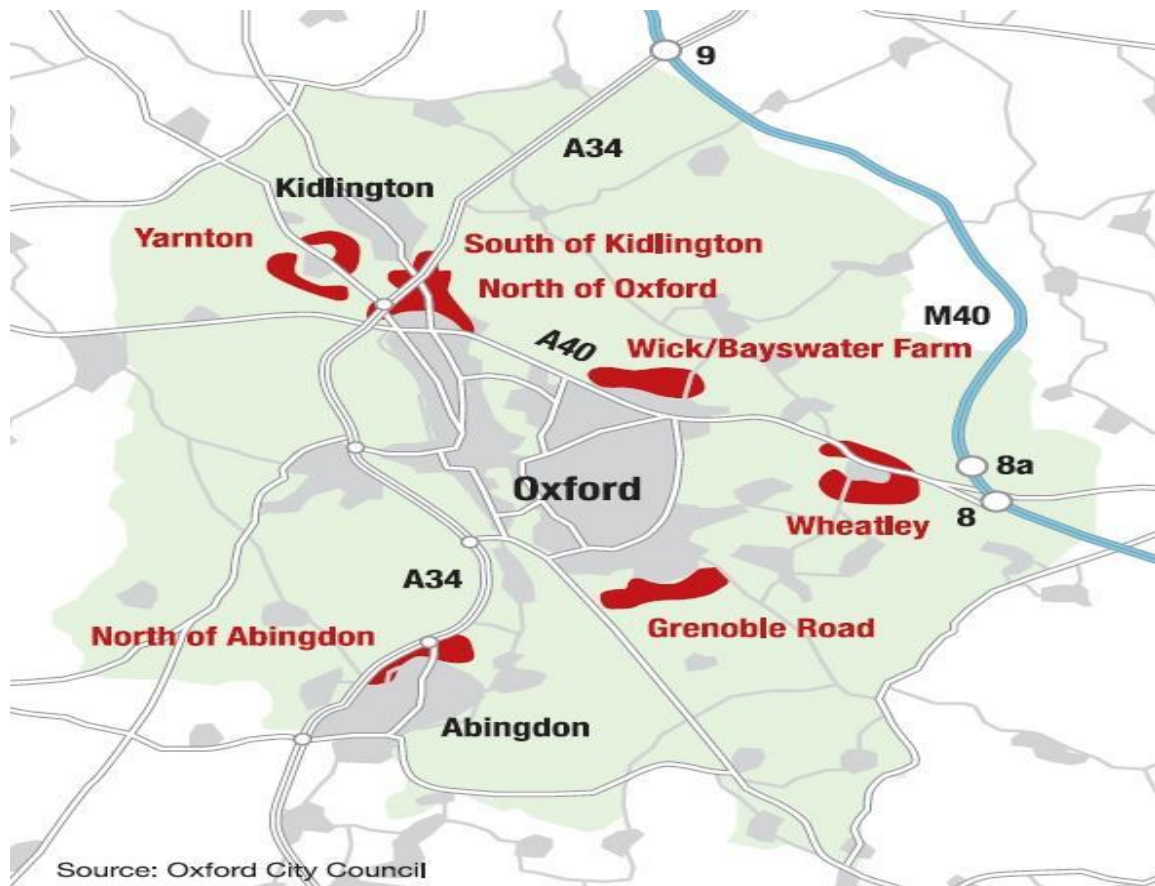


Fig 3.2.1. MAP OF OXFORD CITY COUNCIL'S EXPANSION PLANS INTO ALL THE GREEN BELT ALL AROUND OXFORD

Oxford City Council is keen to expand into the Green Belt surrounding the city, put there to stop urban sprawl and expansion. Oxford City Council is building commercial developments in preference to the housing it apparently needs. The current calculations of housing need look at the forecast of future jobs and surrounding Districts have a duty to 'co-operate' with unmet housing need. Oxford City is therefore trying to expand its 'unmet' housing need into the Green Belt around Oxford, including Wick Farm. Oxford City itself built only 100 homes in 2015/6 and lost a court case challenging housing development in favour of commercial development.

However, in September 2017 the Department for Communities and Local Government has published a reassessment of Housing Need per annum from a suggested new formula. Oxford

City has been reduced from 1200-1600 to 746 and South Oxfordshire from 725-825 to 617. This will take some pressure from Oxford City, SODC and surrounding District Councils.

3.2.2. Oxford City Council Expansion Plans

Local Plan City Council – Wick Farm

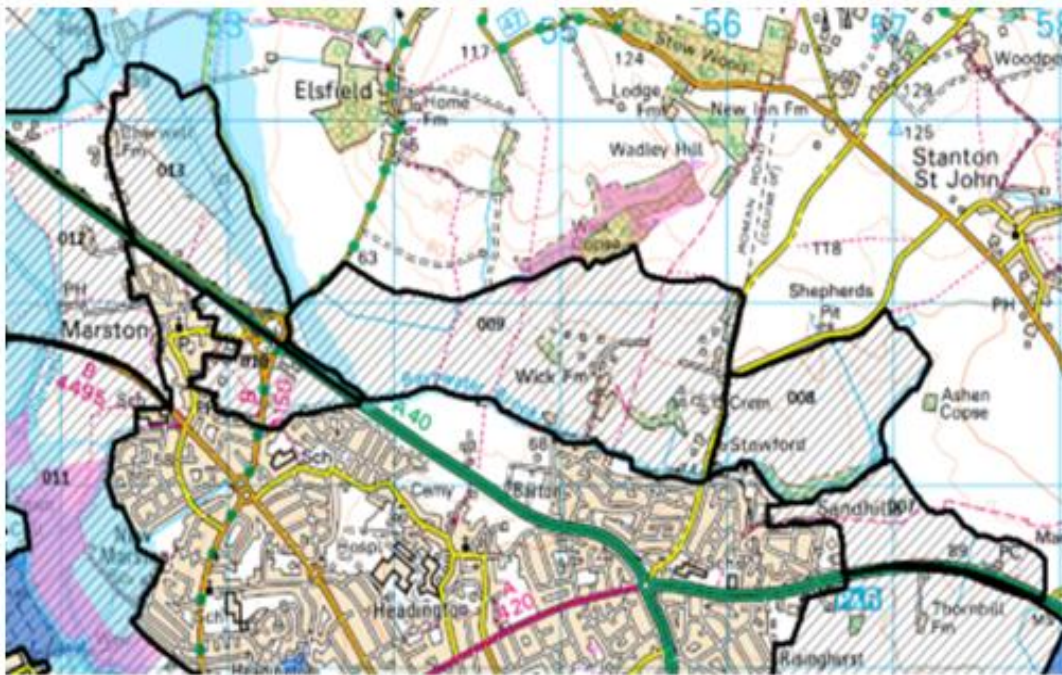


Fig 3.2.2. MAP FROM OXFORD CITY COUNCIL PROPOSALS TO DEVELOP WICK FARM

Apparently motivated by Oxford City Council's Local Plan the land owners of Wick Farm, with fields joining Barton running along the Oxford ring road from Sescut Farm in Elsfield and Woodeaton to 'Lower Elsfield' (Christ Church), lobbied SODC to build enormous developments, between Elsfield village and the ring road to join the Oxford City development at Barton West (Park) and then Wick Farm and areas in Stanton St John and Forest Hill Parishes. This area is shown in the map above from Oxford City Council.¹⁰

Very much against the wishes of local residents Wick Farm and Lower Elsfield together with another Green Belt site to the east Bayswater Farm, were included in the SODC Local Plan as a strategic development site known as Land north of Bayswater Brook. This and other strategic sites in the Green Belt around the ring road were originally included in case the strategic site at Chalgrove failed. However, the Inspector saw fit to include all the sites

¹⁰

[http://www.oxfordmail.co.uk/NEWS/14801038.Plans for 3 000 homes near Barton Park could include housing and parking for hospital workers/](http://www.oxfordmail.co.uk/NEWS/14801038.Plans%20for%203%20000%20homes%20near%20Barton%20Park%20could%20include%20housing%20and%20parking%20for%20hospital%20workers/)

providing 5-8,000 dwellings in excess of local need, including the alleged 'unmet need' for Oxford. The Local Plan was adopted in December '20 and Land north of Bayswater Brook removed from the Green Belt. 20% of residents of Beckley and Stowood parish live at Wick Farm and Lower Farm and will be surrounded by the development.

Oxford City Local Plan Preferred Options 2016-2036

In summer 2017 a newer version of this plan, 'Local Plan Preferred Options 2036' was put out for public consultation.

Oxfordshire Strategic Housing Market Assessment (SHMA), which is disputed by other District Councils identifies housing need between 24,000 and 32,000 additional new homes 2011-2031.

An analysis for this Plan of the potential number of development sites from the spread sheet of 'list of potential sites for allocation' shows a total of 123 sites. No acreage is given or number of potential houses or work units, so analysis can only be performed on the number of sites.

ANALYSIS OXFORD CITY COUNCIL DEVELOPMENT SITES LOCAL PLAN 2036	No. of Sites	%
TOTAL NUMBER OF SITES	123	
Number suitable for housing alone outside Green Belt	43	35%
Number suitable for housing in Green Belt	7	6%
Number suitable for business/academia in Green Belt	1	1%
Number business/academia	38	31%
Number mixed housing, business & academia	20	16%
Number rejected	14	11%

It is notable that the number of business and academic sites and mixed sites is larger than those solely for housing. It is also notable that 8 sites are in the Green Belt within Oxford City, showing the City Council's disregard for the importance of the Green Belt.

2.15 Oxford successfully implemented an Article 4 Direction which restricts the loss of Key Protected Employment Sites in the Local Plan 2001-2016 through permitted development rights. This is to protect against changes of use where planning permission is not required on sites that provide an important contribution to Oxford's economy. The Article 4 Direction would continue to protect buildings on these sites from changes from employment uses,

although it would not be protected against comprehensive redevelopment. However subsequent legislation has made it considerably easier to convert commercial premises to residential, including an amendment to the Town and Country Planning (General Permitted Development Order in 2013 and more recently in *“March 2021, the Government published the latest in a series of amendments to the permitted development rights provided for by the General Permitted Developments Order (GPDO). One such amendment introduced the conversion of various commercial uses into dwellings without the need for express planning permission.”*¹¹

Responses to first steps consultation:

2.18 Some people thought that businesses should be encouraged to locate and grow in the city, however many respondents raised concerns about this. It was clear that most people felt there needed to be an appropriate balance between employment and housing. Many people suggested that Oxford’s housing crisis needed to be addressed before more jobs were created.

There is a high level of commuting in to the city. According to the 2011 Census 100,000 people had their main job in Oxford – 46,000 of them lived outside the city.

In the plan, it states –

*1.26 Green Belt areas in Oxford will be appraised using the formal process and tests set out by the government. Green Belt areas that do not have important public access value, are not in flood plain or of biodiversity importance will be considered for development, if development on those sites could take place while the integrity and purpose of the wider Green Belt is maintained. **The City Council considers that exceptional circumstances exist to justify a Green Belt boundary review due to the need to support Oxford’s economic success and its dependence on the delivery of additional housing to meet housing need.***

*1.37 Views and setting of Oxford - There are important views of Oxford’s world famous and unique skyline from within the city and the surrounding meadows and hillsides. The views of the skyline of the historic centre are fundamentally important to Oxford and must be protected. Development of new higher buildings will be an important part of accommodating necessary growth but must take place in the right locations. New interventions in the historic skyline must make a positive contribution if they are to be supported alongside views of Oxford’s ‘dreaming spires’. Larger developments of a continuous height are unlikely to achieve this. **The impact of new developments on the historic skyline must be objectively understood and explained.***

¹¹ <https://www.bell-cornwell.co.uk/news/new-permitted-development-commercial-to-residential/>

*2.16 The Employment Land Assessment (2016) states that the **total demand for new B1 floorspace is forecast to be between 65,800m² and 105,000m². The demand for B2/B8 floorspace is between -0.1 ha and 21.9ha.** The report concludes that, the demand for B1 floorspace in particular but also B2/B8 use, is well in excess of the current supply. This reflects the findings from previous economic studies and the views of property agents secured through the assessment. The Local Plan 2036 will therefore need to explore how to support existing employment sites; re-evaluate the role and designation of district centres/employment clusters; and encourage the intensification and modernisation of sites*

However, even if this forecast is accurate there is no reason why 'employment land' needs to be within Oxford City. Given the stated problems of transport into and out of Oxford, as well as within it, there is a good case that additional 'employment land' should be provided outside Oxford City as SODC and other local councils have recommended, where transport access is much better.

3.16 Key employment sectors in Oxford are already facing significant challenges in recruiting and retaining staff

As there is a shortage of people to recruit into the new business premises and employment that Oxford City want to create it makes more sense that less emphasis and resource is devoted to expanding employment in Oxford City and surroundings, since there is neither the staff nor the land available. There are many other areas in the UK, which arguably need the new jobs more, and have unemployment and land available.

The number of Jobseeker's Allowance claimants plus those who claim Universal Credit who are out of work is currently 1,055, or 0.9% of workers, as of June 2017 in Oxford City - so there are few staff to fill any extra jobs created, whereas in the UK as a whole the unemployment rate is currently 4.4 % Apr-Jun '17. There is therefore more justification to create jobs elsewhere, where unemployment is high and there are staff available to fill vacancies.

3.11 The gap between the housing need of Oxford and capacity within the city boundary figures is 'unmet need'. The City Council is working with the other Oxfordshire districts to ensure the overall housing needs of the Oxfordshire Housing Market Area are met in accordance with national policy. The City Council is working with the districts through the Oxfordshire Growth Board to help deliver 15,000 homes in the neighbouring districts by 2031. This is an agreed unmet need allocation, used as a working basis for current local plans in Oxfordshire which will be updated when the Oxford Local Plan is completed. The Growth Board has agreed an apportionment split of how much of the 15,000 is to be met in each district. The City Council is working with the district councils to ensure the apportioned unmet need is delivered through their local plans, and at appropriate locations. Those authorities are at various stages of preparing, or partially reviewing, their local plans to incorporate their allocated portion of the 15,000 homes.

These figures are based on projected new jobs, which Oxford City is keen to promote as increased income generation from Business Rates in the future. They state that more income will be generated from business than housing, especially affordable and social housing, hence their strategy to build new businesses in preference to housing.

3.12 This Preferred Options Document has not set out options for those developments in other districts, because they will be considered through their local plan processes. **However it is proposed to set out in the Oxford Local Plan some place-shaping principles for the integration of potential future sustainable urban extensions to the city, located in adjacent local authorities administrative areas.** This would help ensure that the urban extensions and their communities are as well integrated into Oxford as they can be both in function and appearance. The City Council will seek to ensure that the affordable housing element of these urban extensions takes into account the needs of Oxford residents, including nomination rights for the allocation of these affordable homes.

3.21 Overall housing target for the plan period National policy aims to meet objectively-assessed housing needs in full, balanced with other sustainability considerations. The preferred option must also be realistic and deliverable. Oxford's objectively assessed need calculated in the SHMA to 2031 would require a delivery of 1600 homes per year. To proceed with an option that sets a target for 1600 homes per year would clearly be unrealistic within the environmental and physical constraints of Oxford and not a sound policy approach because the evidence indicates that there are not nearly enough sites or unconstrained land opportunities (capacity) in Oxford to accommodate that level of growth

3.23 Present evidence indicates that the physical capacity of the city will be for around 7-8,000 additional homes during the plan period, but further testing of sites is needed to further refine this figure

Responses to first steps consultation:

4.13 Use of land It is clear from the consultation responses received that views were mixed on the idea of a Green Belt review with the possibility of urban extensions. The majority of respondents (282) supported the idea of urban extensions close to Oxford. However, a significant minority of people (111 respondents) were against any development on Green Belt land. Many respondents suggested the City Council should explore a variety of options for increasing housing supply within the city, including removing land from the Green Belt within Oxford, developing taller buildings in some areas, promoting development on previously developed land and considering developing parts of recreational areas that are of poor quality or underused.

According to Oxford City Council there is a high level of commuting into the city. According to the 2011 Census 100,000 people had their main job in Oxford – 46,000 of them lived outside the city. Creating more jobs within the city instead of housing will exacerbate the commuting and parking problems within Oxford City.

7.5 The clear priority is to promote sustainable travel over private car use so to help alleviate the current issues of congestion and air pollution Oxford's existing road network has already reached its maximum capacity, resulting in congestion and air quality issues. While traffic counts carried out at the inner cordon (which specifies the average number of vehicles entering the city centre on any given weekday) shows a stable volume of traffic, the outer cordon of Oxford (which indicates the number of vehicles entering Oxford from beyond the city boundary) is experiencing an increase annually. The SA Scoping Report supports this and concludes that a continuation of existing travel behaviour, especially considering Oxford's potential growth over the plan period, would over-burden the transport network and compromise both Oxford's character and the quality of life of residents.

The Oxford City Local Plan held the Examination in Public in December 2019. There had been a number of questions and debate over the calculations of housing need and using out of date figures. Inspectors stated in their interim report -

“On the subject of housing need, it is our preliminary view that no main modifications are required in respect of the plan’s assessments of overall housing need or affordable housing need, or in respect of the annual need figure of 1,400 dwellings per annum over the plan period from 2016 to 2036 which is referred to in section 3 of the plan.”

This is important as under their ‘duty to co-operate’ surrounding LPAs including SODC are expected to help meet Oxford’s ‘unmet housing need’¹². The changes sought by the Inspectors are currently out to consultation.

The Oxford City Local Plan 2016-2036 was examined and the Inspector’s report was issued on 15th May 2020¹³. *“At full Council meeting on 8th June 2020 the City Council voted to adopt the Plan.”*

3.2.3. SODC’s Green Belt Review

One of the threats came from SODC’s Green Belt Review, where there were suggestions to take ‘parcels’ of land near Wick Farm and adjacent to Barton out of the Green Belt. This was vigorously opposed and was no longer the plan.

Oxford City Council’s latest Local Plan calls for another Green Belt Review in order to expand its supposed unmet housing need into it, but in SODC this was carried out recently.

¹² Oxford City Local Plan Examination
https://www.oxford.gov.uk/info/20286/local_plan_examination/1312/oxford_local_plan_2016-2036_examination

¹³ https://www.oxford.gov.uk/downloads/file/7288/inspectors_report_-_oxford_local_plan_2036

Parcel 11: North eastern edge of Oxford (Land north and east of Barton / Sandhills)
Suggested Changes

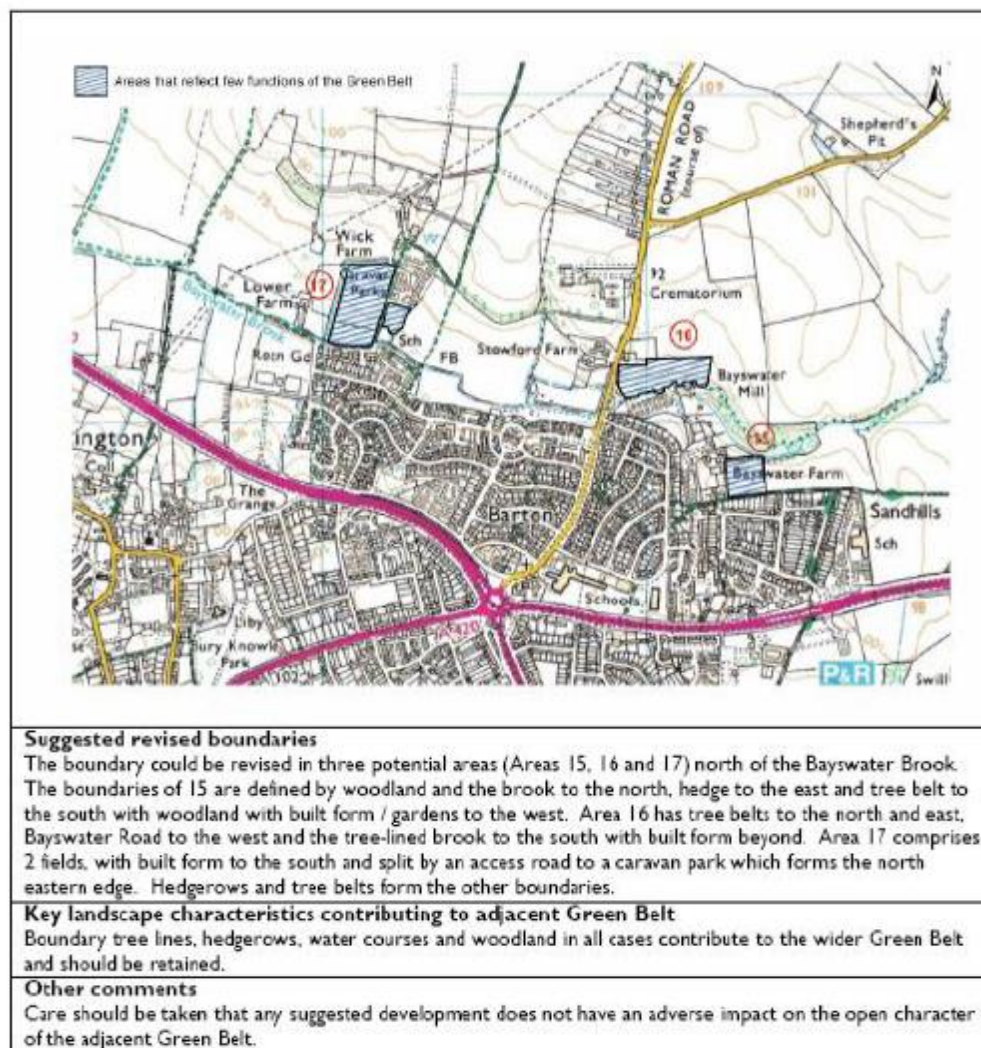


Figure 3.2.3. MAP FROM SODC GREEN BELT REVIEW

3.2.4. SODC's Former Local Plan 2031

The former version of the Local Plan also cited Wick Farm as a possible development for housing.

Local Plan 2031 – Refined Options



Figure 3.2.4. LOCAL PLAN 2031 MAP

The Wick Farm site was vigorously opposed by local residents and in this iteration is not included.

3.2.5. SODC's Emerging Local Plan 2033 Second Preferred Options

The Strategic sites in the Emerging Local Plan are-

- **Culham**
- **Chalgrove**
- **Berinsfield**

Many local Parishioners responded to the consultation defending the decision not to include Wick Farm and Lower Elsfield. However, alternatives were considered in the plan -

The following Alternatives have been subject to a Sustainability Appraisal

1. Chalgrove Airfield 3,500 dwellings within the plan period.
2. Harrington Junction 7 M40 3,500 dwellings within the plan period.
3. Grenoble Road 3,500 dwellings within the plan period.
4. Wick Farm 1400 dwellings within the plan period.
5. Thornhill 1,000 dwellings within the plan period.
6. Lower Elsfield 3,500 – 4,000 in the plan period.

A detailed analysis was carried out on each of these sites¹⁴ and comments on Wick Farm and Lower Elsfield are copied in Appendix 18.

3.2.6. SODC Local Plan 2034/5

In December 2018 SODC approved a new version of the Local Plan. This was of great concern to Beckley and Stowood residents as a new strategic development site 'Land North of Bayswater Brook' had been included which includes Green Belt land at Wick Farm and 'Lower Elsfield' in the neighbouring parish of Elsfield.



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http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=691685320&CODE=06D7B7D923A2A173AD63CF2F4867499C

A number of other strategic sites in the Green Belt on the edge of Oxford were also included Northfield and Grenoble Road which endanger the important role of the Green Belt -

Green Belt serves five purposes:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

There is a danger that this will lead to the creation of a Greater Oxford, which will envelop all the parishes abutting Oxford. In local consultations residents specifically expressed the view that they did not want to be part of Oxford.

All but one of the strategic sites is in the Green Belt, which directly opposed NPPF 137 which essentially states that land should not be taken out of the Green Belt unless all other alternatives have been exhausted.

Another major issue with this plan is that the housing numbers are far in excess of what is required for local housing need –

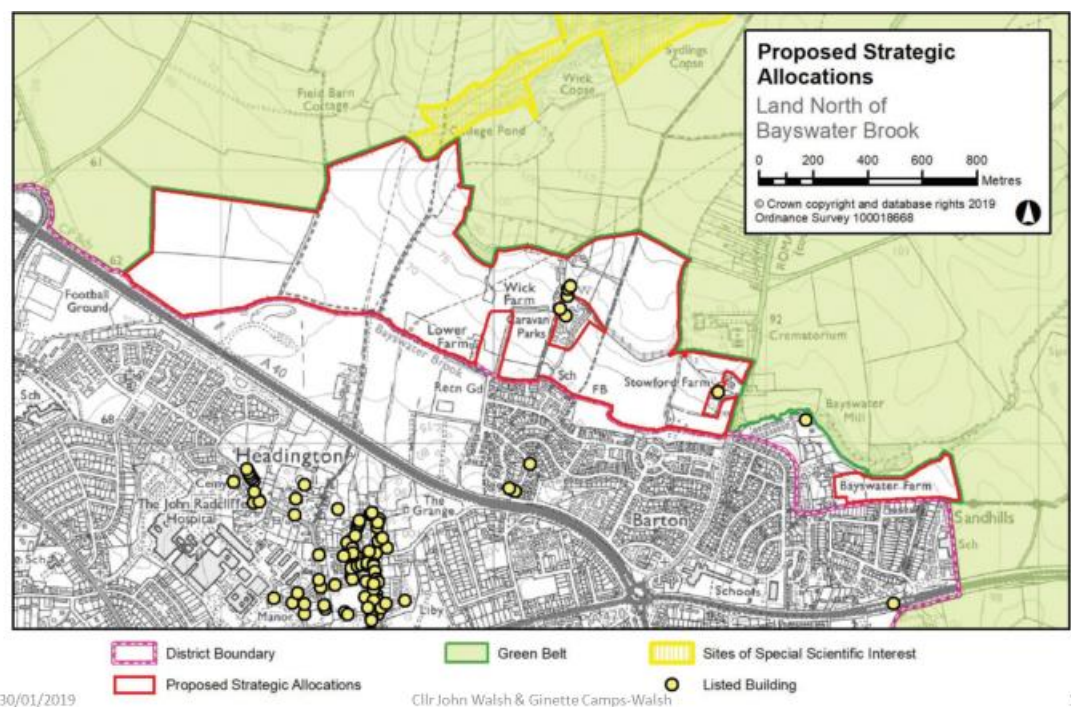
	Per Year	Total
SODC's own need over 23 years		
Latest government calculation		
method gives two alternates	556	12,788
	627	14,421
		=====
With the Growth Deal Government		
has persuaded them to accept	775	17,825

Share of Oxford's Unmet Need over 10 years

The Government calculation method gives close to zero		
With the Growth Deal SODC has now accepted	495	4,950
TOTAL		22,775
The plan provides sufficient sites to build		28,459

	Per Year	Total
The previous version of the plan		
SODC's Need over 22 years	775	17,050
Share of Oxford's unmet need over 10 years	375	3,750
TOTAL		20,800
The plan provided sufficient sites to build		22,563

In addition to the significantly increased housing numbers the specific plans for the site 'North of Bayswater Brook, incorporates a major link road from the Elsfield junction of the Oxford ring road through the middle of the proposed new housing development for 1,100 houses to the A40. As with many other aspects of this Local Plan the road has not been properly costed and the site has not been properly or fully appraised.



The Parish Council and many individuals and organisations made representations against this Plan at all the SODC Council meetings, as well as submitting responses to the consultation. It was also an issue in the May 2019 SODC election, at which there was a change of administration to a Liberal/Green alliance.

The new administration at SODC sought to withdraw this Plan and develop a new one, with more green policies and less destruction of the Green Belt. However, submission of this Plan was part of the Oxfordshire Growth Deal and additional Housing Infrastructure Funding for Didcot. The Secretary of State put a 'holding order' on the withdrawal of the Plan in October 2019. This was lifted in March 2020 as SODC agreed to continue with the Plan through examination.¹⁵

SODC councillors voted to adopt the Local Plan in December '20.

History Of SODC Local Plan 2035

December 2018 - SODC council meetings considering the Local Plan were heavily lobbied against inclusion of the Land north of Bayswater Brook site
SODC full council voted to allow Plan to go to Inspection
March 2019 Regulation 19 consultation

Local Parishes and communities around the Land north of Bayswater Brook development started working together to oppose the development

Early 2020 Submissions and hearing statements for the Examination in Public
14th July 2020 Start of first 'virtual' Examination in Public on Teams led by Inspector Jonathan Bore
September 2020 Consultation on Proposed Main Modifications of the SODC Local Plan
December 2020 SODC adopts the Local Plan 2035 and nearly 2,000 acres of land is removed from the Green Belt for the strategic developments

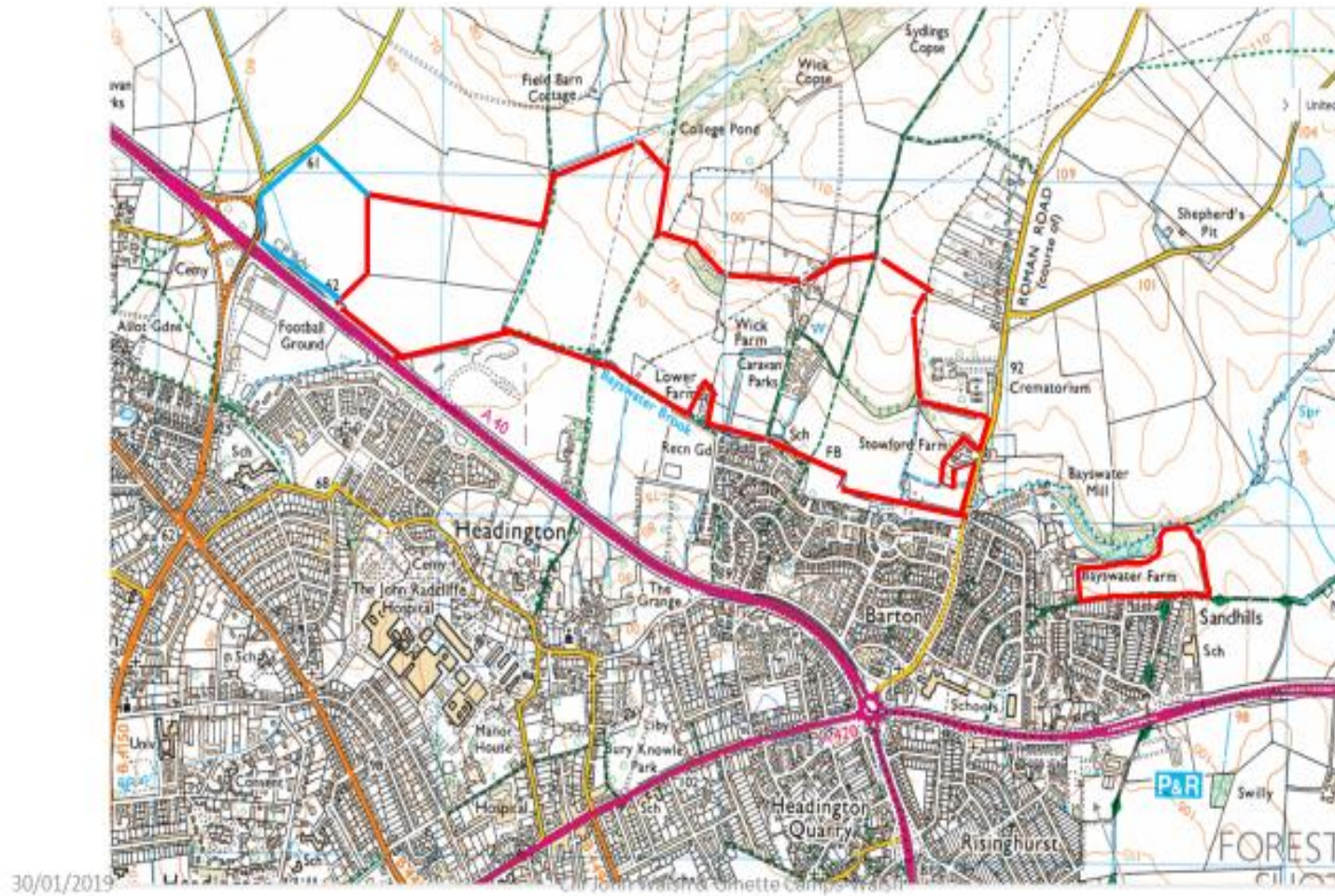
¹⁵ <http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2034>



34 Figure 3.2.6.1.. LAND NORTH OF BAYSWATER BROOK DEVELOPMENT SITE SHOWING 'LINK ROAD'

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Figure 3.2.6.2. LAND NORTH OF BAYSWATER BROOK DEVELOPMENT SITE SHOWING BOTH SITES



3.2.7. Oxford to Cambridge Expressway -

A brief history of the Expressway

- The original Oxford to Cambridge (O2C) Arc initiative was launched in 2003 by three English regional development agencies (RDAs), EEDA, EMDA and SEEDA to promote and accelerate the development of the unique set of educational, research and business assets and activities create an “arc” of innovation and entrepreneurial activity
- The proposal to introduce an Oxford-Milton Keynes-Cambridge Expressway was initiated by both the Conservatives and the Liberal-Democrats in coalition. It is contained in a strategic document produced by the Ministry of Transport.
- The Oxford to Cambridge expressway project was one of six strategic studies which were commissioned as part of the Government’s first Road Investment Strategy (RIS 1) in 2015, for delivery in 2020-25.
- The National Infrastructure Commission (NIC) then chaired by Lord Adonis, produced a number of reports in Nov 16 - Cambridge – Milton Keynes – Oxford Corridor: Interim Report
- NIC produced more reports in Nov 2017 including ‘Partnering for Prosperity – a new deal for the Cambridge – Milton Keynes- Oxford Arc
- There have also been various Reports from Highways England on the Expressway
- On 12th September 2018 the Corridor Decision was announced (see map below) –
“The choice of this corridor means that the government has ruled out construction in the area of the Otmoor nature reserve, underlining its desire to protect the natural environment.”
- In November 2019 Grant Shapps announced that the project is to be reviewed and put on hold.
- Announcement – Highways England - *Project update, 12 March 2020*

The Oxford-Cambridge Arc is already home to some of the most productive towns and cities in the country. The Government’s ambition is for further growth within the Arc that will help make it a world class economic hub, and delivering the right infrastructure is vital to support this.

The Government has investigated the potential for a new high-quality link road between the M1 and M40 which could support this growth and examined the costs and benefits of a range of options, taking account of the views of local authorities and residents in the Arc.

We are now pausing further development of the scheme while we undertake further work on other potential road projects that could support the Government’s ambition for the Oxford-Cambridge Arc, and benefit people who live and work there, including exploring opportunities to alleviate congestion around the Arc’s major economic centres such as Milton Keynes.

We will work with the Ministry of Housing, Communities and Local Government and local partners on the proposed Spatial Framework to identify the role transport can play alongside the proposed economic and housing growth ambitions for the Oxford-Cambridge Arc.

On 18th March 2021 the Department for Transport and Highways England made the following announcement -

“Oxford to Cambridge expressway project cancelled as Transport Secretary looks to alternative plans for improving transport in the region.

Construction of the Oxford to Cambridge expressway has been cancelled as analysis shows the benefits the road would deliver are outweighed by its costs.

*Oxford to Cambridge expressway formally cancelled following pause last March
extensive analysis and local engagement reveal the expressway would not be cost-effective for the taxpayer. Government will continue to work on alternative plans to boost transport connectivity in the arc, alongside delivering the transformational East West Rail.*

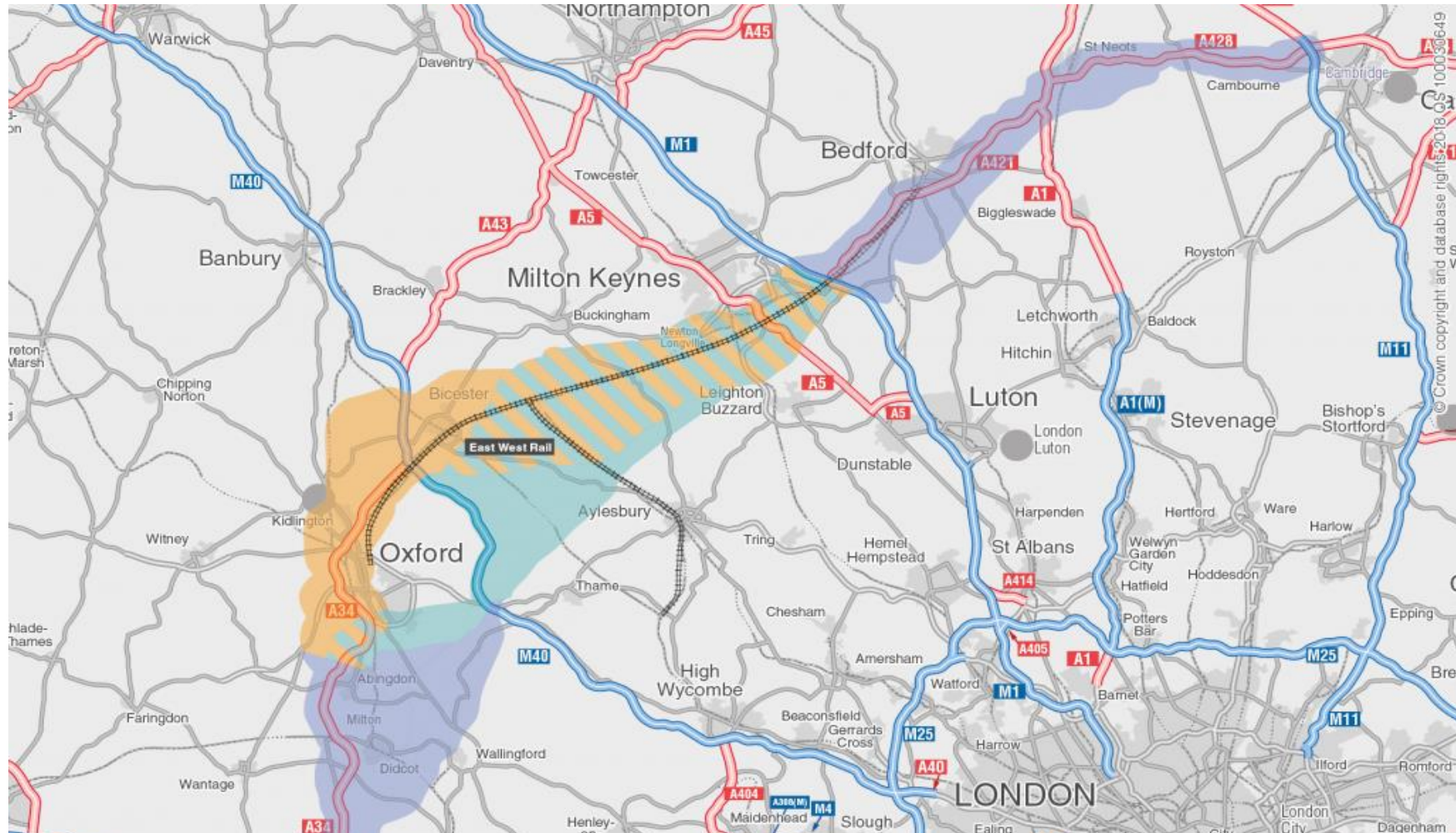
Transport Secretary Grant Shapps has today (18 March 2021) announced the cancellation of the Oxford-Cambridge (Ox-Cam) expressway, after analysis confirmed the proposed project was not cost-effective.

Highways England had been developing potential options for a road link between Oxford and Milton Keynes. However, following close work with local partners since 2014, recent analysis shows that the benefits the road would deliver are outweighed by the costs associated with the project.

Building on the insight already developed by Highways England, the Department for Transport (DfT) will now investigate the need for more targeted road interventions in the area, recognising the vital role that transport investment has to support sustainable growth in the region, as noted by the National Infrastructure Commission. The DfT will work closely with Highways England and England’s Economic Heartland as the sub-national transport body to develop a study on proposals, which will also support the spatial framework.

The East West Rail scheme remains central to providing critical infrastructure within the Oxford-Cambridge Arc, with it not only improving connectivity but also bringing new jobs and opportunities to people in the area. In January, the government announced a £760 million funding commitment to deliver the next phase of East West Rail, which will create 1,500 skilled jobs and reinstate direct rail services between Bicester and Bletchley for the first time since 1968.”

There is a threat from the proposed Oxford to Cambridge Expressway – Road Options B1 & B3



The National Infrastructure Commission will publish its recommendation on an Oxford to Cambridge Growth Corridor in winter '17 of *“one million new homes and jobs by 2050, including the country’s first new towns in 50 years – tackling the area’s housing shortage, improving local transport connections and creating new jobs”* [nic.org.uk]. Highways England has begun work to decide the route that the Expressway should take. There are 3 possible routes around Oxford – The first would upgrade the existing A34 and Junction 9 of M40, then run past Bicester towards Milton Keynes (A43/A421); the second would create a new road leaving the A34 north of Abingdon then running through 10 miles of Green Belt south of Oxford, then north from Wheatley through more Green Belt between Beckley and Stanton St John to Bicester then the A421, and the third would see a new road laid south of Oxford through Thame and Haddenham to Aylesbury.

4. CONSULTATIONS AND COMMUNITY ENGAGEMENT

Details of all the Consultations can be found in a separate Consultation Statement/Report.

At the very first meeting of Parishioners in January 2016 the issues identified that the Neighbourhood Plan should cover were -

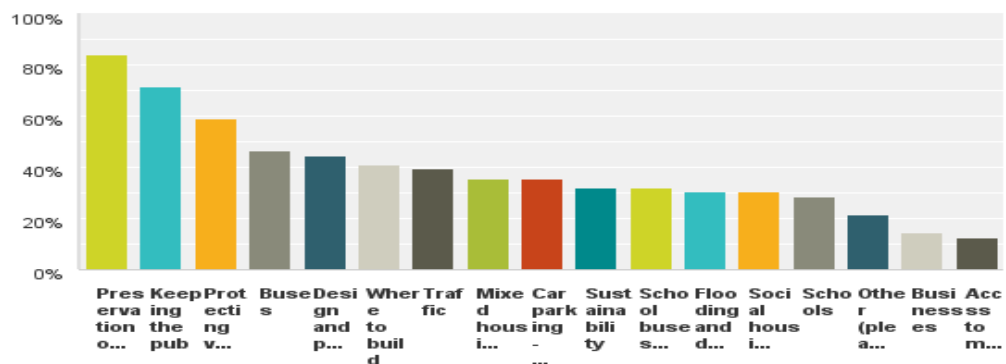
- ***Preservation of the Green Belt***
- ***Traffic***
- ***Buses***
- ***Schools***
- ***Where to build***
- ***Design***
- ***Flooding and drainage***
- ***Keeping the pub***
- ***Businesses***
- ***Sustainability***
- ***Social housing, affordable housing***
- ***Mixed housing - housing for those who wish to downsize and remain in the village***

4.1. VISION FOR BECKLEY AND STOWOOD – INITIAL SURVEY RESULTS

The issues identified in the inaugural meeting were ranked in order of importance in the initial Parish survey.

Q23 A number of issues have been identified to be included in the neighbourhood Plan. Please could you indicate the most important to you and add others not already included below.

Answered: 56 Skipped: 0



Answer Choices	Responses	
Preservation of the Green Belt	83.93%	47
Keeping the pub	71.43%	40
Protecting views from the village	58.93%	33
Buses	46.43%	26
Design and planning	44.64%	25
Where to build	41.07%	23
Traffic	39.29%	22
Mixed housing – (housing for those who wish to downsize and remain in the village)	35.71%	20
Car parking - school, RSPB	35.71%	20
Sustainability	32.14%	18
School buses and buses	32.14%	18
Flooding and drainage	30.36%	17
Social housing/ affordable housing	30.36%	17
Schools	28.57%	16
Other (please specify)	21.43%	12
Businesses	14.29%	8
Access to main gas	12.50%	7
Total Respondents: 56		

Aspirations for the Next 15 Years

43% of respondents would like to attract younger people to the Parish and as the age profile is older this would change the complexion. 30% would like more small houses with 21% wanting more bungalows and houses suitable for the elderly. 21% wanted more mixed housing while 27% thought it should remain as it is. Although aspirations are clearly mixed there is a clear wish to attract more young people, while providing more mixed housing, including smaller homes for older people.

Importance of the Green Belt

There was considerable support for the Green Belt and its purposes, particularly in protecting the Parish from being part of Oxford City. 71% felt that older buildings such as barns should be developed and 52% sensible infilling. Although 20% felt that there should be no development at all in the Green Belt, which as the whole Parish is ‘washed over’ by the Green Belt would mean no development whatsoever.

Employment

Numbers of respondents in employment were reasonably split with 37% of households where none were employed to 27% where one was and 34% where two were. This reflects the older age profile of respondents, who are probably retired.

A large proportion of people work at home, every day, while others work from home on some days, 2 or 4 days per week being the most popular. Otherwise, the most popular way to commute is by car or car and train. The average commute was 5-10 miles being the most popular, but most do not commute.

Apart from commuting and visitors other local traffic is connected with the school run. Most of those responding said their children cycle to school [37.5%] or are taken by car [25%] or coach [25%]. The journeys to school are quite short for most it was only 5-10 miles. However, this does not reflect the traffic problems associated with the school.

Issues for the Neighbourhood Plan

A list of issues for the Neighbourhood Plan were identified in the initial public meeting and views were sought about this original list and the answers ranked.

The most important issue for the Neighbourhood Plan was preservation of the Green Belt [84%], since there had been a number of threats to build on Wick Farm and other fields south of the B4027. This was closely followed by keeping the pub [71%] and protecting the views from the village [59%].

Design and planning, where to build, mixed housing and social/affordable housing were also high in the ranking and are issues that the Neighbourhood Plan can address.

Buses, traffic etc. are issues that the Plan cannot address, but could try to help alleviate with design and site criteria.

The full survey results can be found in Appendix 19.

4.2. SITE CRITERIA RESULTS

A meeting for the whole Parish was held on Monday 10th October 2016 at the Jubilee Hall. Approximately 40 people attended to discuss and decide the criteria for the development sites for new houses in the Parish. These criteria are in addition to the national and SODC criteria: -

Local Development Site Criteria

- Infilling is acceptable – *“Infill development is defined as the filling of a small gap in an otherwise continuous built-up frontage or on other sites within settlements where the site is closely surrounded by buildings. The scale of infill should be appropriate to its location.”* (SODC Local Plan Policy H16: Backland and Infill Development and Redevelopment Point 2.)
- Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred.

- Developments should provide adequate parking spaces to meet residents' needs, to ensure that as far as possible parking on the road is unnecessary.
- A review of flood risk, including springs and water run-off is required for potential development sites.
- Gardens are a very important feature in Beckley and provision of a garden in proportion to the house size is an important criterion to the character of the village – *[Refer to Parish Character Assessments]*
- Generally, building with local materials including stone will be strongly preferred. Building materials of brick, rendered blockwork, timber or tile cladding and natural stone with roof covering of tiles or slate will be accepted. uPVC and other synthetic cladding materials will be discouraged
- Minimising paved and hard standing areas is strongly encouraged to minimise flooding and run off.
- Building of smaller houses is encouraged to help to ensure that local people have the opportunity of affordable housing or to downsize and stay in the village and maintain the vibrancy and vitality of the village

Appendix 20. gives further details of the meeting outcome.

4.3. DESIGN CRITERIA RESULTS

In addition, the following design criteria have been drawn up for all new developments and were consulted upon. The draft proposals were published in the Beckley Parish newsletter, which goes to all households and feedback was requested.

An on-line survey was set up with links in the newsletter and parish e-mails encouraging residents to participate.

The detailed results of the survey are in Appendix 21.

Summary of Design Criteria Consultation Survey Results

83% of respondent agreed with the development and environment criteria. The individual responses can be found in the appendix. There were several comments about the desirability of parking on a house driveway, rather than congesting roads further.

The views that were felt particularly important were those to and from Beckley across Otmoor, from Woodperry Road to Brill, from Common Road across Otmoor from Stowood across to Didcot and the M40 Stokenchurch cutting. Views within Beckley village that are valued are all the roads in the conservation area – Church Street, High Street and Otmoor Lane.

92% of respondents wanted to preserve the grass verges as an important feature in the village. Parking around the school was mentioned as a problem.

Design attributes that people would like to encourage are stone or brick construction, pitched roofs, a garden with sufficient space around the house at each side, two-storey and traditional in nature, blending with surrounding houses.

Designs that respondents wish to avoid are houses that 'look like it's meant for a seaside resort', avoiding pillars and balconies, pebble-dashed semis, houses out of character with the rest of the village and houses that are overly large and modern.

77% of respondents agreed with the Beckley Design Guide. There were 2 comments defending solar panels wherever they are placed on roofs.

All agreed with the proposal to have a co-ordinated scheme for street furniture and 92% were in favour of underground cables.

Environment

The Village draws much of its physical character from its rural location and from its Green Belt designation. This is of great value and should be strenuously preserved for the long term. Items of special note and worthy of protection are: -

1. The views from the village and from all the approach roads northwards over Otmoor and adjacent farmland, towards Brill and towards Didcot
2. The views into the village, particularly from the north, to the Church and conservation area.
3. The openness of the farmland and the associated groups of trees and hedgerows and other small fields, paddocks and large rear gardens.
4. Front gardens must be preserved and should not be taken up solely for the parking of vehicles. Guidelines are available from the Royal Horticultural Society on planting guides for front gardens and driveways.
5. Power cables should be located underground, not overhead.
6. Additional street lighting will be discouraged.

Traffic and Parking

Developments which increase the quantity of traffic and car parking, particularly in the village centre will not be encouraged.

Grass verges on the road frontage of dwellings are an important feature of the village and should be protected, preserved and encouraged as far as possible.

BECKLEY DESIGN GUIDE

In cases where an acceptable and reasonable case has been made for development the design of extensions and new buildings will be expected to comply with the following guidelines: -

1. Views from public places both to and from the village should be protected. New development that does not detract from the view of the skyline would be preferred. (*Residents have no right of protection for views from their private property*)
2. Buildings should always be compatible with the size and character of their neighbours, and in the Conservation Area should generally be built of natural stone.
3. Access should be provided between any part of a building and the boundary with its neighbours and space between houses should be maintained as it is an important aspect of the village.
4. Building heights should be restricted to be in keeping with surrounding houses.
5. No building should be designed so that its height, massing and general scale is over dominant or intrusive over its neighbours.
6. Buildings should seek to preserve the daylighting, amenity and privacy of neighbours. i.e., as far as possible not overshadowing, overbearing or overlooking
7. Developments should provide adequate parking spaces to meet resident's needs, to ensure that, as far as possible, parking on the road is unnecessary.
8. Generally, building with local materials including stone will be strongly preferred. Building materials of brick, rendered blockwork, timber or tile cladding and natural stone with roof covering of tiles or slate will be accepted. uPVC and other synthetic cladding materials will be discouraged
9. Flat roofs are not regarded as being in character with the rural landscape and will generally be discouraged.
10. Large box type dormer windows with flat roofs will generally be discouraged.
11. While solar panels on roofs are encouraged, these should face the rear of the property where possible.
12. Outside lighting on buildings should be fully shielded to direct light downwards to prevent light pollution.

4.4. CYCLEWAY SURVEY

A survey was carried out of Beckley residents on the demand for a cycleway during March 2020. It was publicised in the Beckley and Stowood newsletter that is delivered to all households in the Parish and by e-mail to Beckley and Wick Farm/Barton residents. The detailed results can be found in Appendix 9.

4.5. REGULATION 14 – FIRST CONSULTATION

The consultation was carried out between 1st December 2017 and 24th February 2018.

A full report can be found in a separate Consultation Report. There is a summary below.

CONSULTEES

1. The Statutory Consultees

A list can be found in Appendix 22. These were all contacted by e-mail and a delivery and read receipt were requested. Their responses, where received are recorded in Appendices 22

2. Residents of Beckley and Stowood Parish

In addition, the consultation was advertised to all residents of the Parish of Beckley and Stowood in the Beckley and Stowood Newsletter. This was delivered to every home in the Parish. The Plan was published on the Beckley and Stowood web site. Their responses, where received are recorded in Appendix 22.

3. Local Businesses and Organisation

Those identified in the Plan were contacted by e-mail and asked to response. In addition, a reminder e-mail was sent. Only 2 local businesses responded.

4. Others with Interests in the Parish

A list of non-resident land owners was requested from SODC. SODC refused due to the Data Protection Act, although did state that the information was available on the land registry web site. The Steering Group did not have the resources to search the land registry web site and so contacted the non-resident land owners about whom they were aware.

PUBLICITY FOR THE NEIGHBOURHOOD PLAN

The Neighbourhood Plan Pre-Submission Consultation was published on the Beckley and Stowood web site –

http://www.beckley-and-stowood-pc.gov.uk/?q=community/parish_council

There were a number of documents which are split onto 2 pages. The first page is the main report and summary and a link to the survey about it - <http://www.beckley-and-stowood-pc.gov.uk/?q=node/777> The second page is the Evidence Base containing appendices e.g. the detailed responses from consultations, reference documents and appraisals of the different areas in the Parish - <http://www.beckley-and-stowood-pc.gov.uk/?q=node/778>

There were also hard copies available of both the plan and questionnaire at the village hall and Abingdon Arms.

Responses were requested either on-line –

<https://www.surveymonkey.co.uk/r/BeckleyNPconsultation>

by e-mail or by post.

A public meeting was held at Beckley village on Tuesday 6th February at 8 p.m. and this was publicised in the Parish Newsletter, by poster on the Parish noticeboards and by e-mail. Over 44 people attended.

The minutes for the meeting can be found in Appendix 22.

RESPONSES

These were all analysed and considered and remedial action taken where it was thought necessary.

APPENDIX 2.1 Oxfordshire County Council

These comments were considered and the Local Plan section updated.

APPENDIX 2.2 SODC

SODC's guidance and advice would have been greatly appreciated when requested. Their comments have been noted and a Planning Consultant with expertise has been engaged to address them.

APPENDIX 3.3. HISTORIC ENGLAND

The Plan has been updated with more recent history, a list of listed building and a policy on preserving heritage has been added.

APPENDIX 3.5. OXFORDSHIRE CCG

Concern was expressed about large developments. The Neighbourhood Plan does not include any large or small developments.

APPENDIX 3.2 THE ENVIRONMENT AGENCY and APPENDIX 3.8. BBOWT

The Plan needs more information on the Environment and to include policies to preserve it and biodiversity. These were added.

APPENDIX 4.1. INDIVIDUAL RESPONSES

- Support the redevelopment of Wick Farm and barns - restoring dilapidated heritage assets - pragmatic approach - commercial or care
- Agree with 5.1.1. Development Site Criteria, 5.1.2. & Beckley Design Guide
- Support for burying cables
- Would like to encourage buildings to be sustainable with ecological standards
- Sensible to include a boundary for guidance for developers - boundary sensible but needs fine tuning - why are some fields to the north of High Street & down Church Street and along Common Road not included. Why are 1 or 2 houses within the boundary included when adjacent ones are not.
- Design Guide - solar panels should be allowed

- 3.5.5. SODC's Emerging Local Plan - please continue to oppose removal of Wick Farm from the Green Belt - destruction of scenic area - the roads would not be able to cope
- Eager for the Plan to become 'made' and legal.
- Concerns about the Expressway and an original route between Beckley and Stanton St John and across Otmoor
- It is important to have some development to attract younger people into the village and promote downsizing
- Sensible to include village boundary and provide useful guidance for developers
- Important for residents to have their say on how the Parish develops and what new developments look like. Development Site Criteria and Design Guide good but need beefing up. SODC Planning Officers appear to disregard the policy that new developments should be in keeping with their surroundings
- APPENDIX 4.2 New Road Responses
 - A number of comments that there should be no development of 2 sites not previously developed, in the line of bungalows which all had planning permission.

4.6. REGULATION 14 AND STRATEGIC ENVIRONMENTAL ASSESSMENT – SECOND PRE-EXAMINATION CONSULTATION - AUGUST – SEPTEMBER '22

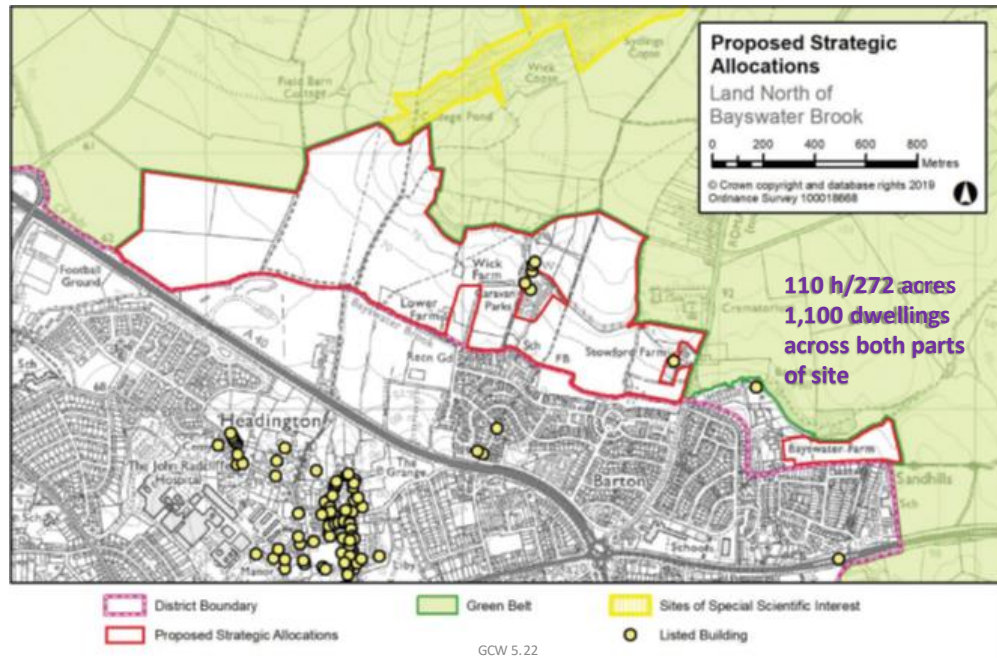
The report on this second consultation is contained in the separate Consultation Statement/Report as are details of all the Consultations.

5. DEVELOPMENT OF THE STRATEGIC SITE LAND NORTH OF BAYSWATER BROOK

In December '20 SODC adopted the unpopular and controversial Local Plan 2035. All the 7 strategic sites put forward, including those included late, as an alternative if Chalgrove failed were included. Those included late were all in the Green Belt around the Oxford ring road – Grenoble Road, Northfields and Land north of Bayswater Brook. Their late inclusion had not allowed enough time for sufficient work to be carried out on infrastructure and these issues remain even though the Plan has been adopted. 11,600 new dwellings were approved which is 5-8,000 above local needs, including the 'unmet need' from Oxford. This means that all the former Green Belt sites around the ring road are not needed to satisfy SODC and Oxford City housing need. Only one strategic site was not in the Green Belt – Chalgrove. Nearly 2,000 acres (770 hectares) of Green Belt land has been lost to development in the SODC Local Plan 2035.

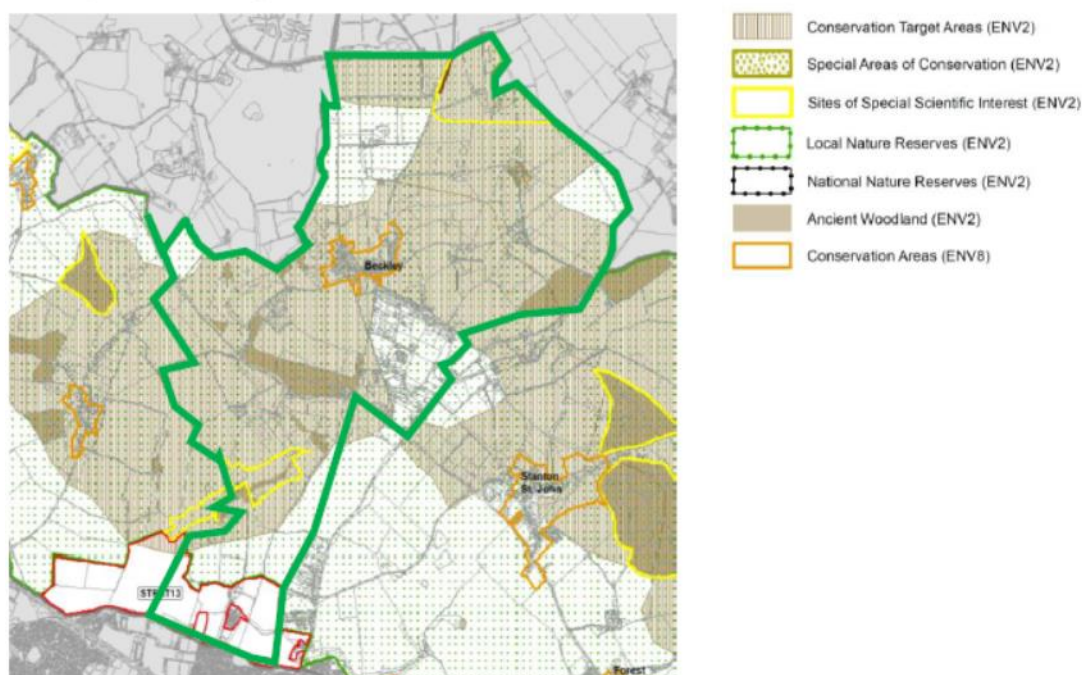


5.1. LAND NORTH OF BAYSWATER BROOK



This site was in the Green Belt and is 110 hectares/272 acres of agricultural land. 20% of the parish's residents live in the middle of the site at Wick Farm and Lower Farm. This part of the site spans 3 parishes as shown in Fig 2.1, below – to the west Elsfield, the middle shown with a green border Beckley and Stowood and a small part to the east in Stanton St John parish. The other part of the site, Bayswater Farm is in Forest Hill with Shotover parish

Figure 2.1 Excerpt from South Oxfordshire Local Plan key diagram showing policies relevant to Beckley and Stowood parish



¹ <https://www.legislation.gov.uk/ukpga/1990/8/schedule/4B>

² <https://www.southoxon.gov.uk/south-oxfordshire-district-council/planning-and-development/local-plan-and-planning-policies/local-plan-2035/adopted-local-plan-2035/>

³ <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/11/Inspectors-Report-November-2020.pdf>

5.2. THE GREEN BELT AND LOSS OF IMPORTANT LANDSCAPE AND COUNTRYSIDE

LAND LOST FROM THE GREEN BELT IN SODC LOCAL PLAN							
SITE						SIZE HECTARES	ACRES HOUSES
Culham Science Park – 77 hectares						77	3,500
Land Adjacent to Culham Science Centre						220	
Berinsfield – 130 hectares						130	1,700
Grenoble Road – 153 hectares						153	3,000
Northfield – 68 hectares						68	1,800
LnBB – 112 hectares						112	278 1,100
Wheatley – 10 hectares net, total area 22 H, 12 brownfield						10	500
Total land to be lost from the Green Belt -						770	1903 11,600

In Beckley's Neighbourhood Plan survey 80% of the respondents wanted to protect the Green Belt closely followed by not wanting to be part of Oxford.

The Green Belt Topic Paper PSD 07.¹⁶ (April 2020) in the SODC Local Plan library ¹⁷ gives the impression that the proposal to remove the Land North of Bayswater Brook (LnBB 112 hectares) from the Green Belt is in line with the Green Belt Studies in the supporting evidence. This is untrue.

In Appendix 2 of PSD 07. there is a single sentence regarding NAT 07¹⁸ (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 Brook (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, LnBB 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 NAT 08.¹⁹ (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, LnBB 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 NAT 09.²⁰ (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

¹⁶

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204468&CODE=18C4B0CB532270272D4BE7B5BD74CC6C

¹⁷

https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=FolderView&ID=1283190358&CODE=02C6029D539747E85D411F11E1E73C1D&NAME=Local%20Plan%20-%20Examination%20Library&REF=SLP_EXAMLIB&REFERER_URL_IN=&SOVA_IN=SOUTH#exactline

¹⁸

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190471&CODE=96FAD849B5185AA1C229A444EA12A172

¹⁹

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190472&CODE=96FAD849B5185AA19EE77A39BC51AA96

²⁰

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190473&CODE=96FAD849B5185AA1D95AD413C1AC422E

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). The report concludes -

“Development within the parcel/site would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford.”

PSD 07. gives a summary of the conclusions for NAT 09 on pages 41 to 43, but forgets to include any reference to this site.

It is very hard to justify the Inspector’s statement in his letter IC 12. of 28th August ’20 when referring to developing land in the Green Belt (paragraph 38) that –

“The allocations are well chosen and do not represent unrestricted sprawl;”

The evidence suggests that the sites around Oxford, including LnBB will promote urban sprawl from Oxford into the countryside. The Inspector went on to say

“They do represent encroachment into the countryside, but the allocations are of such a size that defensible boundaries and structural landscaping and good quality open space are capable of being designed into the schemes’ masterplans, such that the impact on the Green Belt can to a degree be mitigated.”

This was discussed at the Examination in Public of the SODC Local Plan and the Inspector indicated that he was very sympathetic to this idea, but the removal of land from the Green Belt remains unaltered.

5.2.1. Compensatory Improvements for The Green Belt

The two Green Belt reviews have been carried out on the Wick Farm site and these have also been discussed in detail in sections 3.1.1. The Oxford Green Belt, 3.2.1. The Oxford Green Belt, 3.2.3. SODC’s Green Belt Review and previously in this section. In addition, two Landscape assessments have been reviewed in Section 2.2.1 The two recent appraisals and reviews of the Green Belt in Beckley and Stowood Parish have been reviewed in section 1 of this Plan.

NPPF 142. states - *142.. Where it has been concluded that it is necessary to release Green Belt land for development, plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*

SCG 04. Statement of Common Ground on LnBB between SODC and the Site Promoters²¹ (June 2020) states (para 3.10) that the parties agree that Green Belt appropriate compensatory measures can be accommodated by the landowner. It is agreed that the green infrastructure and biodiversity improvements proposed can help provide the appropriate

21

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

compensatory measures, in terms of both environmental quality and accessibility, required by paragraph 138 of the NPPF, as shown above.

In the Inspector's letter paragraph 24. *In the case of STRAT13: Land North of Bayswater Brook, there is plenty of land to incorporate a buffer and alternative greenspace between the site and the adjacent SSSI.*

Any loss of Green Belt will require compensatory improvements to the quality and accessibility of the remaining Green Belt (Inspectors Q 16.2). This should be evidenced by landscape, biodiversity and recreational needs. This does not appear to have been undertaken, and no explanation has been given as to why not and when will it happen.

Improvements could include:

- new enhanced green infrastructure
- woodland planting
- landscape and visual enhancements
- biodiversity enhancements
- improved walking and cycle routes
- access to existing and enhanced recreational and playing field provision
- adequate screening for current residents of the new development to be agreed with SODC and with the individual residents

Landscape and visual enhancements should reflect the existing agricultural and rural landscape

These improvements should be discussed with the "Community Liaison Committee".

It is noted that the policy and indicative 'concept plan' indicates such improvements. However, these would not be required if this Green Belt agricultural land was not being proposed for housing. It is not clear what proposals have been made for offsite improvements. Mitigation and compensation provision are not quantified in any way.

In the SODC Local Plan library document NAT 09. Green Belt Assessment of Strategic Sites in South Oxfordshire prepared for SODC by LUC in December 2018²² completely ignores previous detailed reviews on the strategic sites in the Green Belt and that great harm will be done to the Green Belt at a number of the proposed strategic sites. These are shown in the Site Selection Paper TOP 6.1 on a map in Appendix 10 HARM RATINGS FOR GREEN BELT REVIEW STUDY - In the same paper the previous Appendix 9 – SITE BOUNDARY ALTERATIONS DESCRIBED also shows that where new Green Belt boundaries are required for strategic sites that these have not yet been decided and all require "completion of detailed appraisals". This has not been carried out. For a number of sites there is no other appropriate Green Belt boundary as these should, as stated in paragraph 139 of the NPPF be physical features that are readily recognisable and likely to be permanent, such as a river or stream.

143. When defining Green Belt boundaries, plans should:

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent

²²

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190473&CODE=96FAD849B5185AA1D95AD413C1AC422E

Policy STRAT6: Green Belt of the SODC Local Plan states –

2. The Green Belt boundary has been altered to accommodate strategic allocations at STRAT8, STRAT9, STRAT10i, STRAT11, STRAT12, STRAT13 [LnBB] and STRAT14, where the development should deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land, with measures supported by evidence of landscape, biodiversity or recreational needs and opportunities. The boundaries of the reviewed Green Belt are identified on the changes to the Green Belt boundary maps (see Appendix 4) – Copied below

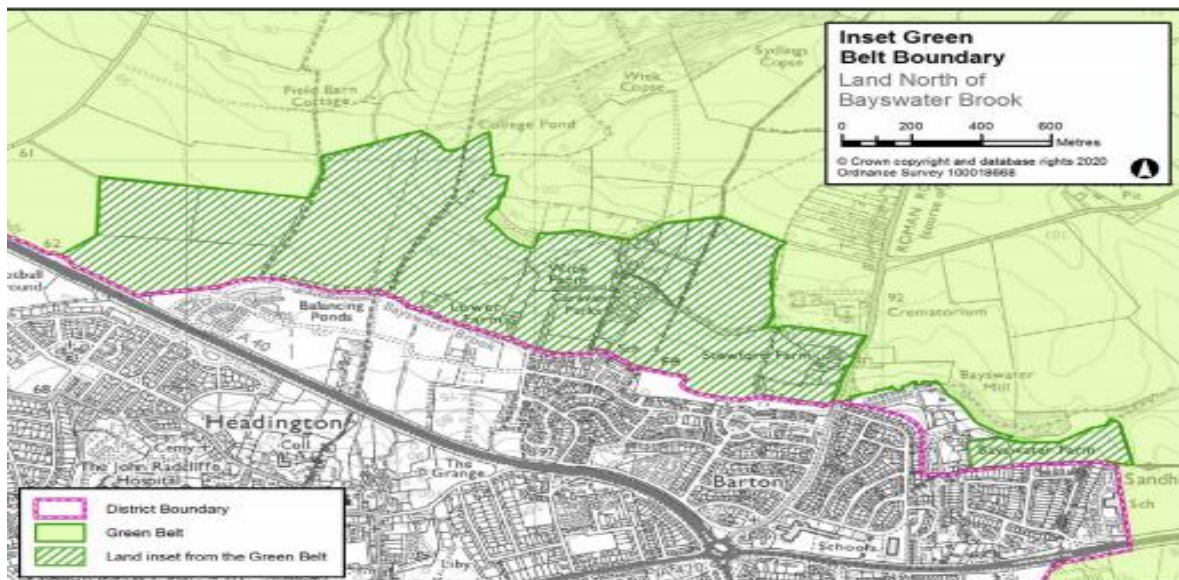


Figure GB 1. GREEN BELT BOUNDARY MAP

The Bayswater Brook was the boundary of the Green Belt at LnBB and as such was a permanent boundary fulfilling the requirements of NPPF 143 f. No such 'permanent boundary' has been proposed as a new boundary. It must be ensured that the new boundary as defined in the amended Local Plan is as permanent as possible.

There are no physical features shown on the Ordnance Survey map to define a new Green Belt boundary. It is important that the boundary is as permanent as possible, and defensible so it cannot be changed.

It is important that as permanent boundary as possible is agreed with BBOWT, Natural England and the Community Liaison Committee. As the Woodland Trust states

"The ruling majesty of the woods, the wise old English oak holds a special place in our culture, history, and hearts. It supports more life than any other native tree species in the UK; even its fallen leaves support biodiversity."

The trees take 20-50 years to reach their ultimate height of 12 metres and above (RHS). Therefore, as growth is normally slow the saplings when planted should be at least 1.8 metres high and pot grown so they can become established and help to form a boundary relatively quickly.

Policy STRAT13: Land North of Bayswater Brook of the Local Plan states The Green Belt –

3. The proposed development at Land North of Bayswater Brook will deliver a scheme in accordance with an agreed comprehensive masterplan that has been informed by detailed landscape, visual, heritage and ecological impact assessments and demonstrates an appropriate scale, layout and form that:

iv) provides a permanent defensible Green Belt boundary around the allocation and a strong countryside edge;

5.3. THE TRANSPORT INFRASTRUCTURE

There is a significant difference between parts of the Local Plan that have been present throughout the process and those sites added in later on. The developments at Chalgrove and Culham are complemented by detailed listings of road improvements, which have been costed and there is information on the availability of funding. In contrast the strategic development sites added in later in the process do not have the necessary planned infrastructure. Modelling had confirmed that developments in the Green Belt to the east of Oxford would cause significant problems (TRA 06.5 Evaluation of Transport Impacts - Stage 3 - Development Scenarios and Mitigation Testing, Addendum (updated Scenario 5b results)²³ and TRA 06.6 Evaluation of Transport Impacts- Stage 3 5c Addendum (updated on 22 July 2020), but exactly how to solve these problems and how much it would cost has not been progressed. The Transport Infrastructure for Land north of Bayswater Brook remains unresolved. This in part is due to the fact that the site's financial viability is questionable with costly transport infrastructure; that SODC has not carried out the modelling work and other assessments required and that Oxfordshire County Council is therefore very concerned and has not been party to Statement of Common Ground agreements with SODC and the developers^{24 25}. This also includes the statement in the Inspector's letter paragraph 24 that *"The suggested wording has been agreed with the County Council and site promoters and can be taken forward for consultation as a main modification"*. At the time of the launch of the Main Modifications consultations this was confirmed with Oxfordshire County Council that the wording had not been agreed and this remained the case in March '21. It remains the case that transport infrastructure for LnBB and the other former Green Belt sites around the Oxford ring road has not been resolved. Oxfordshire County Council has expressed concern as the ring road and Headington roundabout not only serve Oxford City, but are also part of the national trunk road network.

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TRA 06.5 Evaluation of Transport Impacts - Stage 3 - Development Scenarios and Mitigation Testing, Addendum (updated Scenario 5b results) **Atkins Evaluation of Transport Impacts | Version 1.0 | 28 March 2019**

The maps in this report show clearly the impact of additional traffic at morning and evening peak hours –

²³

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190524&CODE=753BC786212096D43444E99351B38907

²⁴ SCG04 Bayswater Brook SODC and Christ Church, Oxford and Dorchester Residential -

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

²⁵ SCG11 Bayswater Brook Sandhills SODC -

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204844&CODE=76C8D3FCEA9FF535552BAD9500C03309

Figure 40 South Oxfordshire flow difference (Scenario 5B – Do Minimum) (PCU/hr) – 2031 morning peak

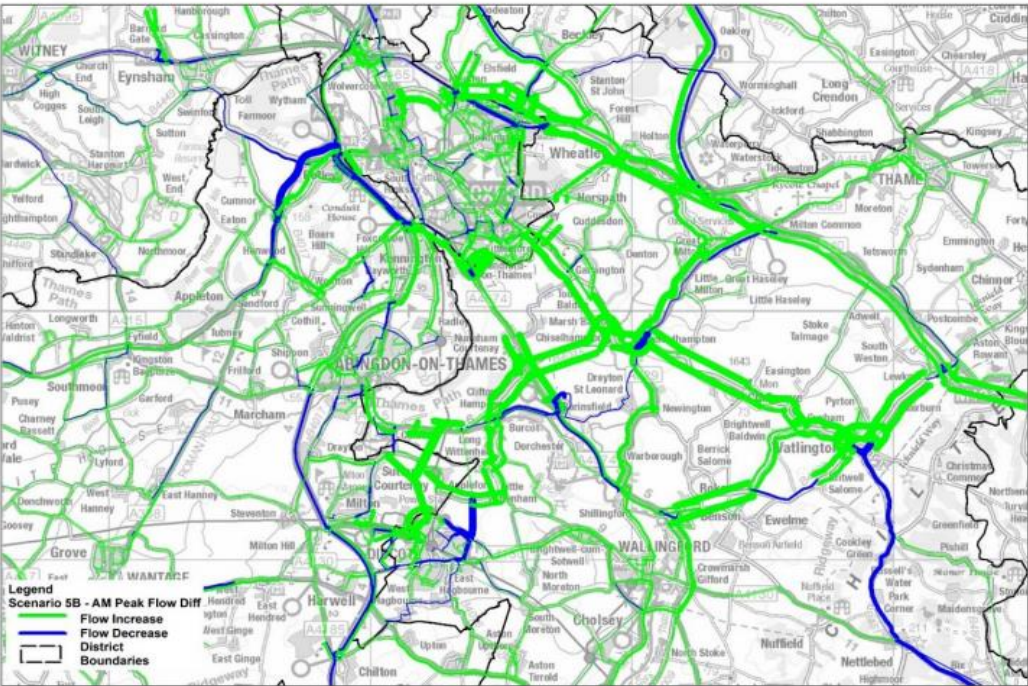


Figure TA 1. FROM TRA 06.5 TRAFFIC FLOW INCREASES

Figure 41 South Oxfordshire flow difference (Scenario 5B – Do Minimum) (PCU/hr) – 2031 evening peak

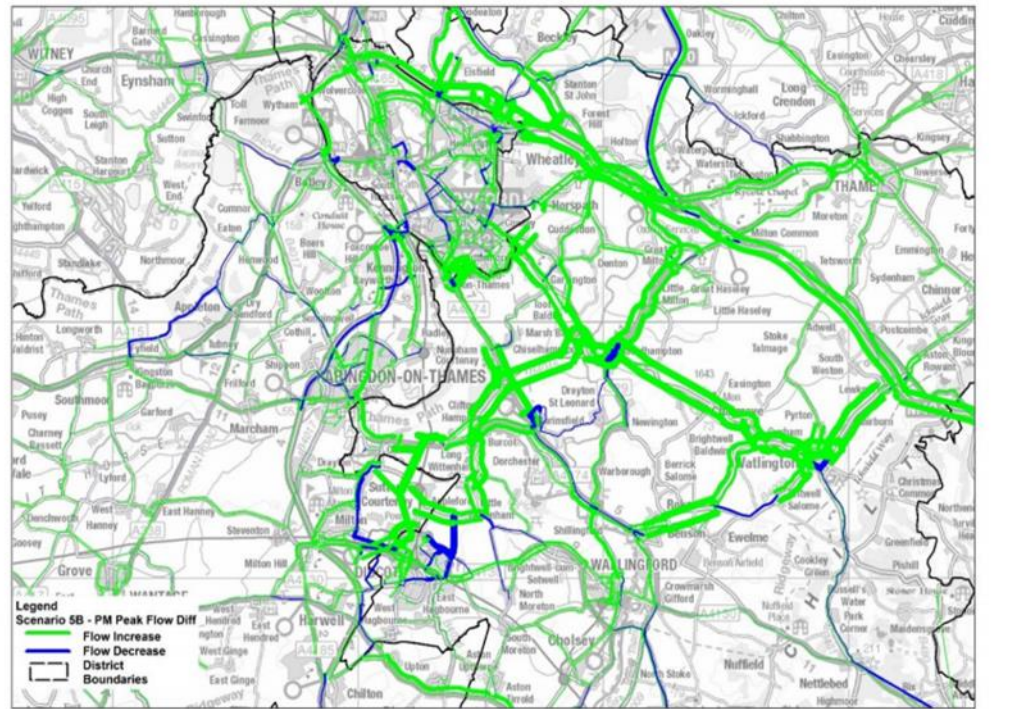


Figure TA 2. FROM TRA 06.5 TRAFFIC FLOW INCREASES

This shows that not only will the ring road and A40 have 'flow increases' but so will all the local roads and village centres around LnBB – the Woodeaton Road, Elsfield Road, Elsfield village, B4027, Beckley village, Horton Road, Bayswater Road, Stanton St John village and Forest Hill roads and village.

This modelling does not take into account 'Connecting Oxford',²⁶ now called the Central Oxfordshire Travel Plan²⁷ which proposed to close the Marston Ferry Road to private vehicles not resident in Oxford City and make access to central Oxford via the ring road and through Summertown. The effect of the additional volume on the ring road from this, a car park levy and other measures has not been modelled. Oxford City Council proposes to have a series of bus gates²⁸ more recently known as traffic filters to stop private cars from outside Oxford at peak times driving across Oxford and discourage cars from coming into the centre of Oxford. Vehicles would have to use the ring road to access other parts of Oxford, thus increasing traffic there. This has also not been modelled at all and is likely to bring forward the date when the ring road becomes gridlocked at peak times.

To further demonstrate the current road capacity issues both Oxford City Council and Oxfordshire County Councils gave evidence in the Hearing sessions. Oxford City Council in their Hearing Statement on Matter 16 said –

14. Road capacity and access: It is understood that there are capacity issues on the routes into and around Oxford at the A40 and Oxford Ring Road, but particularly at the Headington, Heyford Hill, Littlemore, Cutteslowe and Wolvercote roundabouts.²⁹

Oxford County Council in their Hearing Statement said –

14. The Evaluation of Transport Impacts report sets out potential mitigation for the traffic effects of development at North of Bayswater Brook. Without mitigation, the County Council's transport model found that the effects of development in this location (modelled as 1,100 houses as per Scenario 5c in the ETI Stage 3) would cause severe effects on the highway network. With mitigation, either in the form of a grade-separated Headington roundabout, or a new A40 bypass extending from Marston Interchange to a new junction east of Thornhill Park & Ride, the effects were identified as broadly being acceptable, with the acknowledgement that further work on sustainable modes is required.

Together the former Green Belt development sites around the ring road – Grenoble Road, Northfields, Barton Park and Land north of Bayswater Brook will generate in excess of 7,100 cars. This is an additional car or van per household in line with vehicle ownership shown in the 2011 census for the parishes and communities surrounding Land north of Bayswater Brook shown in 5.3.4. Analysis of car ownership shows 110% car or van ownership per household.

²⁶ <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/connectingoxfordshire.pdf>

²⁷

https://mycouncil.oxfordshire.gov.uk/documents/s63546/CA_NOV2922R05%20Annex%201%20Draft%20Central%20Oxfordshire%20Travel%20Plan.pdf

²⁸ https://www.oxford.gov.uk/news/article/1496/councils_share_updates_on_temporary_bus_gates_proposals

²⁹

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204304&CODE=F2123C4F21C1D2D92B927BDF3193261E

FORMER GREEN BELT STRATGIC SITES AROUND OXFORD RING ROAD

SITE	HOUSES
Grenoble Road – 153 hectares	3,000
Northfield – 68 hectares	1,800
LnBB – 112 hectares	1,450
Barton Park	850
Total Houses	7,100

2.6. Transport Network Assumptions

A number of different highway network improvement schemes have been added in the various scenarios being tested. Table 10 shows in which scenarios each network scheme is included. Figure 4 and Figure 5 show where the schemes and development sites are located.

Figure 4 Proposed Highway Scheme Locations

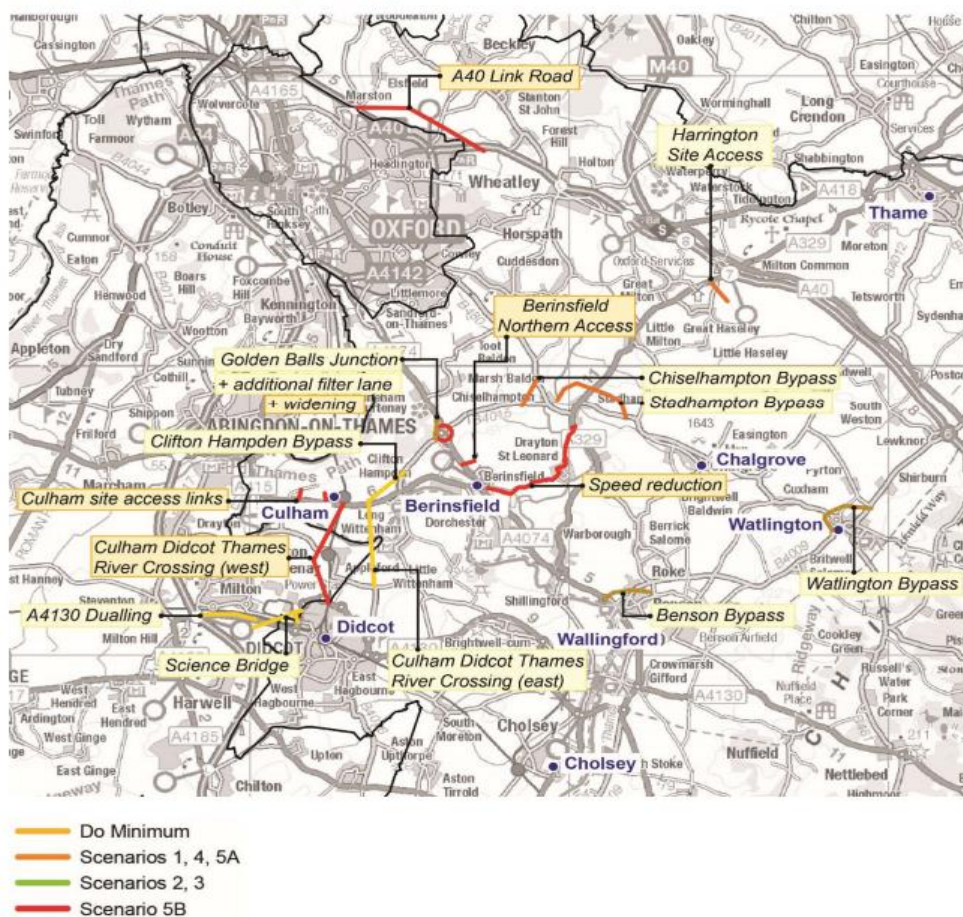


Figure TA 3. SHOWING THE 'LINK ROAD' – RING ROAD AND HEADINGTON ROUNDABOUT BY-PASS FROM TRA 6.4

Figure 3-1 – Proposed Highway Scheme Locations for Scenario 5c

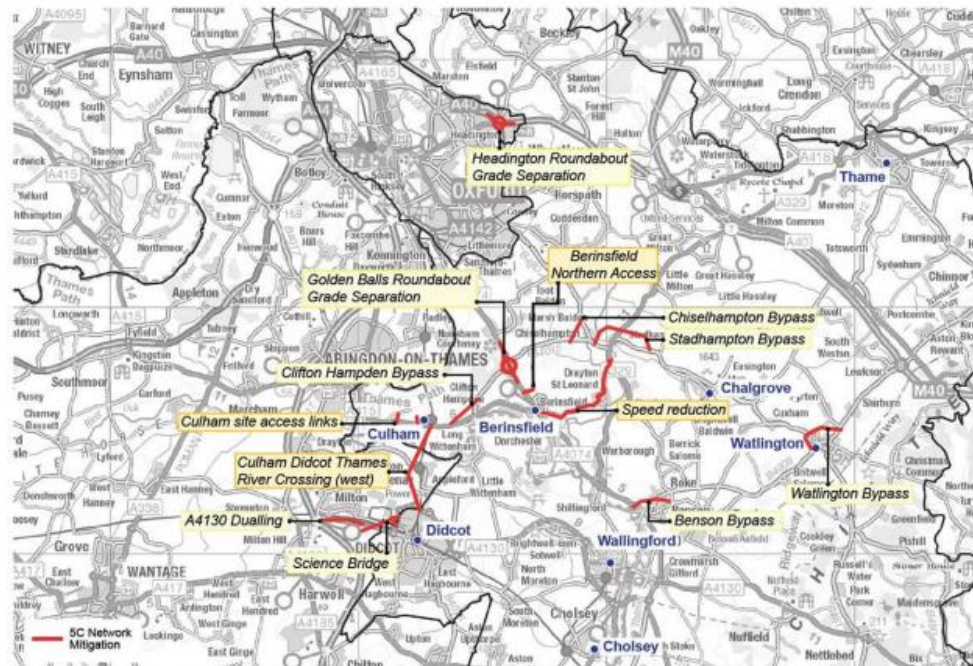


Figure TA 4. SHOWING RECONFIGURATION OF THE HEADINGTON ROUNDABOUT FROM TRA 6.6.

At the Examination in Public of the SODC Local Plan no agreement had been reached between SODC and the County Council on the alleviation of the ring road and Headington roundabout. The Inspector Jonathan Bore suggested a completely new policy which had not been assessed or modelled at all. From his letter

** A modification is required to STRAT13 to align the transport requirements for the site, as far as possible, with Oxford City's planning policies concerning reduced car use and sustainable transport priorities, which may assist in reducing the need for extensive highways infrastructure."*

The Inspector made changes in the Main Modifications, which have now been incorporated within the adopted Local Plan --

"As a first priority, these should provide high quality pedestrian, cycle and public transport connections into Oxford to maximise the number of trips made by non-car modes, and measures to discourage car based development. 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. Any planning application will be expected to be accompanied by a Transport Assessment and Travel Plan. Transport improvements which are likely to include:

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.

3.114 of the Local Plan states *requirement for improvements to the Headington roundabout and its approaches (including bus priority measures); or 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.*

For the proposed development at LnBB of 1,100 new houses (approximately 2,640 people), alleviation is required of the additional pressure and traffic volume on the ring road and Headington roundabout and local adjoining. Three possible solutions were included in the SODC Local Plan –

1. A 'low car policy' introduced by the Inspector. It is undefined with no evidence base.
2. A 'link road' is proposed that will run from the Elsfield junction with the Oxford ring road, through the middle of the site and extend into the neighbouring parishes to the east - Stanton St John and Forest Hill to link with the A40 near the current lay-by at Sandhills/Forest Hill. This road is intended as a by-pass road for the heavily used Headington (Green Road) roundabout, as the ring road is already at capacity and new developments at Barton Park have yet to show their impact on traffic.
3. The second alleviation option is reconfiguration of the Headington roundabout to take more traffic.

None of these options have been properly or fully assessed, particularly the effect on local traffic, congestion and journey times.

There has been no modelling of the first 'low car policy', but this is a requirement to produce a masterplan.

The second (Figure TA 3.) is shown in TRA 6.4. Evaluation of Transport Impacts: Stage 3 - Development Scenarios and Mitigation Testing³⁰ Jan '19 Atkins copied below 2.6 Transport Network Assumptions

The third (Figure TA 4.) is show in TRA 6.6. Evaluation of Transport Impacts: Stage 3 Development Scenarios and Mitigation Testing - Addendum (updated Do-Minimum and Scenario 5c)

30

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190523&CODE=753BC786212096D4FA1C25DE121849AE

5.3.1. Financial Viability of Land North of Bayswater Brook

The Land at Bayswater Brook site is '*only marginally viable*' according to the report by PSD 52. Aspinall Verdi "South Oxfordshire CIL and Local Plan Viability Assessment"- June 2020³¹ paragraph 5.38 and it has the highest infrastructure costs of all the sites.

5.44 of the report states –

*"We would normally conclude that **this scheme is significantly at risk for delivery**. However, in this case, we have consulted with the landowner of this site who is intending bring forward the development on their own land and will therefore benefit from the profit of the development which our appraisals show to be £52.5 million. This demonstrates that SSG – Bayswater Brook is deliverable and the land-owner must be held to their undertaking to deliver a policy compliant scheme"*

However, the report goes on to discuss in subsequent paragraphs compliance with the new Carbon Reduction policy and modelling for a 7% increase in building costs, which are not included in the calculations. The costs for the link road and pedestrian bridge are also considered too low. The other traffic alleviation scheme reconfiguration of the Headington roundabout, has not been costed. In the detailed calculations for the site (pages 217-219) a deficit of £19,404,415 is shown, but this does not include carbon reduction, provision for an increase in building costs, mitigation for loss of the Green Belt; full mitigation for the SSSI or full transport infrastructure costs, including purchase of the land east of the Bayswater Road for construction of the 'Link Road'. In Appendix 5 Page 174 200703 Strategic Sites Infrastructure and S106 Assumptions – Some costs are incorrect, some are missing, the total of the costs that are considered is £111,448,106, but the costs are spread evenly over 9 years apart from the country park, archaeological investigation, community hall (most in last 2 years), primary school (in second year), highways infrastructure (over 5 years – not realistic). The costs that are missing are -

- The cycleways
- Land for Link Road east of the Bayswater Road

This is in addition to the missing costs identified above and the transport infrastructure costs are not realistic. The conclusion must be that the site is not financially viable and therefore not deliverable.

The Inspector's intervention and rewriting of the transport infrastructure to include no new infrastructure costs would be very welcome to the developers. However, this position itself is not viable to bring the site forward and for both current and future residents to carry out their normal day to day travel.

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https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204542&CODE=B79D8153BC48355D9AB3657AF388C4AB

5.3.2. Current Road Congestion Around LnBB and Commuting Patterns

5.3.2.1. *Commuting into Oxford*

The most recent data available appears to be the 2011 census. An analysis of this by Oxfordshire County Council³² “Travelling to work: commuting patterns in Oxfordshire” shows that of the 100,084 people working in Oxford 45,852 (46%) commuted into Oxford. Of these 7,400 commuted from South Oxfordshire. The County Council’s analysis - Travelling to work 3: commuting 2011 by mode of travel, settlements in Oxfordshire³³ shows that the majority of commuters to central Oxford, Cowley and Headington commute from South Oxfordshire by car, with a considerably smaller proportion commuting by public transport.

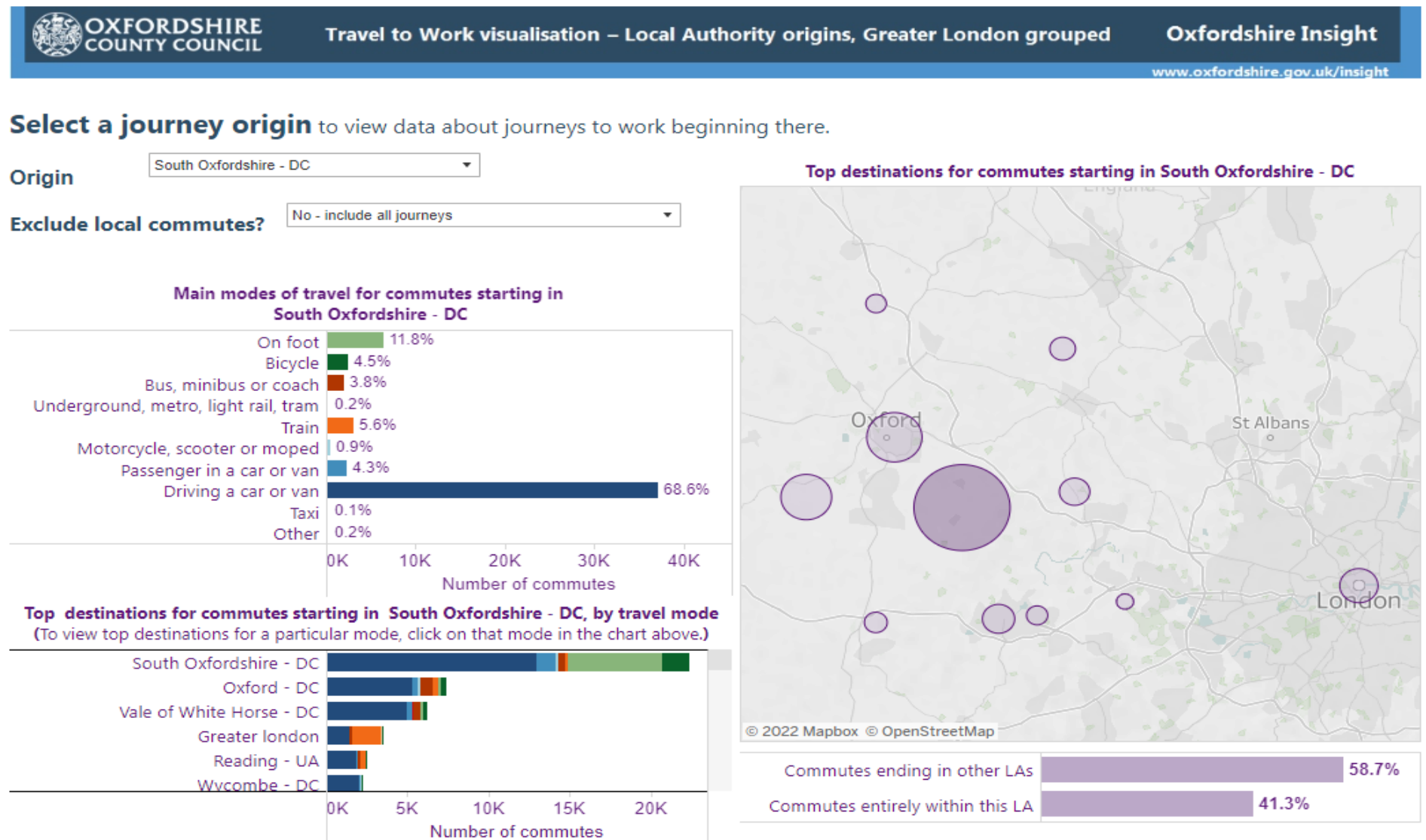
This is broken down by mode of transport showing journeys from South Oxfordshire to Oxford over the page³⁴

³² https://insight.oxfordshire.gov.uk/cms/system/files/documents/TTW%20briefing_110914_FINAL.pdf

³³ https://insight.oxfordshire.gov.uk/cms/system/files/documents/TTW3_settlementsbymode.pdf

³⁴ <https://public.tableau.com/views/2011CensusTTWOriginDistrict-GL/LAleveljourneyorigins?:embed=y&:showVizHome=no>

FIGURE TA 5. TRAVEL TO WORK MODE OF TRANSPORT



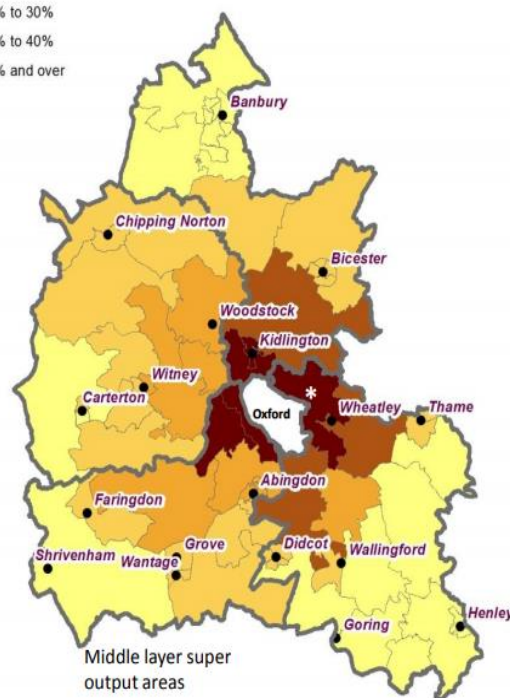
Further analysis³⁵ shows the highest percentage of people commuting into Oxford are from the east of Oxford with 50% from the area near Stanton St John, which would include Beckley and other nearby villages, and 30-40% from the Otmoor towns further to the north east.

None of these rural villages has regular public transport and none are served by cycleways, so the only option is by car.

High % commuting to Oxford in some areas of the district

- According to the Census 2011 survey, 14% commuters in South Oxfordshire travelled to Oxford to work.
- The area with the highest proportion was the rural area to the east of the city including Stanton St John* with 50% commuting to Oxford.

Percent of commuters working in Oxford of total commuting to work



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Ordnance Survey 100019348.

Source: ONS Census 2011 table WU02

South Oxfordshire evidence summary August 2015

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Figure TA 6. PERCENTAGE OF COMMUTERS WORKING IN OXFORD

In consequence of this high level of commuting, the local roads surrounding Land north of Bayswater Brook have become congested to over- capacity at peak hours.

Oxfordshire County Council's Annual Average Daily Traffic Map³⁶ shows that to the north the B4027 near Noke 5,800 vehicles per day at the last count in 2018, the Woodeaton Road has a flow of 2,700, the Elsfeld Road 900, the Bayswater Road north in Stanton St John 4,600 and in Barton 6,300, B4027 near Forest Hill 1,700. In terms of human experience this means at peak times that the Woodeaton Road queues for approximately ½ mile sometimes without

²³ https://www.oxford.gov.uk/districtdata/downloads/file/135/south_oxfordshire_evidence_summary_-_august_2015

³⁶ <https://oxfordshire.maps.arcgis.com/apps/webappviewer/index.html?id=afe8bef2e7514f91bb1bf6ec034fb69b>

moving. It took a resident working at the hospital 35-55 minutes from the village to the John Radcliffe hospital (approximately 3.5 miles) or another going into Summertown and leaving at 7.30 a.m. an hour. The Elsfield Road queues from near the village down the hill over the flyover at Marston, down Marsh Lane into New Marston and it takes at least 30 minutes to reach Summertown. The journey from the crematorium in the Bayswater Road to the Headington roundabout takes 30 minutes, but queues reach back for at least another half mile. These journeys are becoming intolerable for commuters. There are no cycle paths or public transport. Many of the residents from these villages to the east and north east of Oxford are key workers in the hospitals some with emergency responsibilities.

The Department for Transport traffic census data for the ring road and Headington roundabout is discussed further in **Section 5.3.8. Mitigation Policies for ‘The Link Road’**.

5.3.3. Impact of Connecting Oxford and Oxford City Bus Gates

Connecting Oxford now renamed Central Oxfordshire Travel Plan, proposes to have ‘traffic filters’ (bus gates for all cars from outside Oxford) on the Marston Ferry Road, and make cars enter north Oxford via Summertown. From the traffic information in 2018 the Marston Ferry Road carried 11,300 vehicles per day. These would be pushed onto the ring road which carried 14,900 vehicles at the Cutteslowe roundabout. Those wishing to access the John Radcliffe hospital complex from north Oxford would also not be able to use the Marston Ferry Road and would be pushed onto the ring road and Marsh Lane. This would exacerbate queues along Marsh Lane and lengthen queues on the Woodeaton and Elsfield Roads. It would also increase queuing, congestion and journey time for patients and visitors to the John Radcliffe hospital complex, made considerably worse by Oxford City Council’s refusal to allow building of sufficient car parking. This proposal has not been modelled but could easily double the traffic on the Elsfield Way section of the ring road and cause a doubling of queues and journey times. Oxford City is also proposing a series of bus gates in the centre of Oxford so vehicle owners cannot get across Oxford and will need to go around the ring road.

While it is outside the scope of this Neighbourhood Plan, if the objective is to reduce car traffic in Oxford, provision should be made before anti-car action is taken for alternative modes of transport, particularly from villages where there is no public transport and no alternative to car use. This might include car parks on the edge of Oxford, with good connections to public transport and the provision of more Park and Ride sites. The only Park and Ride site locally at Thornhill cannot be reached without going round the Headington roundabout.

5.3.4. Car Ownership

The table below shows the car ownership per household in the communities and parishes around LnBB. The first group are neighbouring communities within Oxford and shows that there is a car ownership of 1 vehicle per household, even though access to public transport is relatively good, compared with the more rural parishes. The next group is the surrounding parishes with little or no access to public transport, with unsurprisingly higher car ownership, as there is little alternative and similarly in the Otmoor Towns where they would use the roads on either side of LnBB to commute into Oxford.

CAR OWNERSHIP PER HOUSEHOLD PARISHES AROUND LnBB			
https://www.nomisweb.co.uk	Census 2011		
Parishes	No. Households	Total Car & Van Ownership by Ward/Parish	Average Cars & Vans per Household
Neighbouring Areas of Oxford			
Barton & Sandhills	2850	2754	0.97
Risinghurst & Sandhills	1756	2117	1.21
Headington	2,556	2,382	0.93
Marston	2,516	2,733	1.09
			103%
Surrounding Parishes*			
Beckley & Stowood	238	422	1.77
Elsfield	76	152	2.00
Stanton St John	181	310	1.71
Forest Hill with Shotover	342	538	1.57
Otmoor Towns Commuting Through Area			
Horton-cum-Studley	187	374	2.00
Noke	51	103	2.02
Islip	270	431	1.60
Oddington	51	113	2.22
Charlton-on-Otmoor	176	316	1.80
Fencott and Murcott	99	213	2.15
*No data for Woodeaton			

There is no evidence that the communities around LnBB cannot do without cars, nor that the new residents of LnBB can either.

There is also no guarantee that the residents of LnBB will work in Oxford, or that all household residents will work in Oxford. It is more likely that one adult may work in Oxford, while another commutes elsewhere by car.

5.3.5. Low Car Schemes

Research on 'Low Car Schemes', restricted parking schemes (controlled parking zones) and 'Developments with Low Parking Requirements' has revealed little evidence that such schemes have been shown to work outside the centre of large cities and towns. Restricted parking in cities and urban areas has been shown to cause 'cruising' – cars causing congestion and pollution while looking for parking spaces^{37, 38}. It is worth quoting a poll on reducing car ownership in The Engineer in 2019³⁹ *"suburban and rural households will likely continue to depend on personal vehicles"*. The article goes on to quote people in suburban and rural communities having no reasonable or cost-effective alternative to cars. There are many studies about reducing car usage, but all are focused on cities and large towns and not developments on the edge of a city in the Green Belt. A recent paper "Review of the Effects of Developments with Low Parking Requirements"⁴⁰ looks at 16 existing low-parking developments – 11 in Sweden and 1 in UK, Switzerland, Austria and 2 in Germany. In the introduction it states – *"It thus seems that parking has for a long time been regulated on little empirical evidence of its effects and weak scientific base for its implementation."* This research questions whether these schemes actually reduce car ownership and usage or whether they attract people with that attribute. In the conclusion there was criticism of the research methodology – *"the low quality of the majority of the evaluations"* and they had *"good prerequisites for sustainable mobility, such as access to public transport, a central location, mobility services, bike paths, and good access to services"*. They go on to conclude – *"For this to be successful, requirements for MPR and mobility services [e.g., car sharing schemes] should be included in the planning permission. Similarly, legally binding contracts are needed to clarify responsibilities between developer, municipalities, and mobility service suppliers"*.

Recently a number of Low Traffic Neighbourhoods have been introduced, which have become very popular with Councils due to the availability of Government grants. These restrict access for vehicles to certain roads, pushing through traffic outside these areas and this allegedly reducing 'rat runs'. These do reduce traffic in the neighbourhood, but also reduce overall footfall and trade. These are not however the same as low car use schemes. In Oxford they have proved to be very unpopular.

Oxford City Council does have approximately 33 'Controlled Parking Zones' administered by the County Council. These do control the number of parking spaces available for residents (see map)⁴¹ and charge for parking spaces. This scheme was to be extended to the areas around LnBB – Barton, Sandhills and Risinghurst. There appears to be no assessment on the effectiveness of this policy and yet it is planned to extend it. The objective appears to reduce

³⁷ Minimum Parking Requirements: A Word of Caution - <http://uchicagogate.com/articles/2019/4/9/minimum-parking-requirements-word-caution/>

³⁸ Impact of Cruising for Parking on Travel Time of Traffic Flow - <https://doi.org/10.3390/su12083079>

³⁹ <https://www.theengineer.co.uk/car-ownership-poll/>

⁴⁰ https://research.chalmers.se/publication/517938/file/517938_Fulltext.pdf

⁴¹ <https://oxfordshire.maps.arcgis.com/apps/Styleer/index.html?appid=6055cb5fa36f4ababdcadbe35a99a5e6>

parking for commuters. However, those commuting from the east of Oxford, the parishes around LnBB have no alternative but to use cars and there is nowhere to park on the way into Oxford. Some residents of villages such as Beckley currently park in Barton and catch a bus into Oxford. If the restricted parking zones are extended to Barton, then they will be forced into their cars to commute into Oxford. Buses use the same road network as cars and making life difficult for those who have no alternative but to commute by car. It is likely to encourage them to work elsewhere and their companies to relocate out of town.

Although the question was asked at the Examination Hearing it has not been answered –

How will current commuters into Oxford from the villages to the east continue to get into Oxford through all the new traffic created by the proposed development?

5.3.6. Mitigation Policies

There are three possible transport infrastructure schemes and two of these will require mitigation policies.

1. The 'low car policy'
2. Reconfiguration of the Headington roundabout, which requires no specific mitigation for the scheme itself, but will require mitigation for any effect on local roads
3. A 'Link Road' to bypass the 'Northern Bypass' of the Oxford ring road and the Headington roundabout.

5.3.7. Mitigation Policies For 'Low Car' Policy

As previously stated, there is little or no evidence that this policy will work as LnBB is not in a central urban area. It is on the edge of suburbs and the countryside. It may be based on the Oxford City 'Controlled Parking Zones', but there is an assumption that the only destinations residents will ever want to visit are on public transport routes or are near enough to cycle or walk to. No new resident will apparently have any desire to visit the beautiful Oxfordshire countryside, farm shops, country pubs, garden centres, historic houses or gardens or buy anything bulky. It is very likely that the original alleviation policies for the ring road and Headington roundabout and local roads will be required in addition. The Main Modifications states and this has been incorporated into the Local Plan-

Policy STRAT13: Land North of Bayswater Brook (MM17 2 (vi) 71)

2. v) *All Necessary facilities for movement. Transport improvements as set out in the Infrastructure Delivery Plan, As a first priority, these should provide high quality pedestrian, cycle and public transport connections into Oxford to maximise the number of trips made by non-car modes, and measures to discourage car based development.*

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. Any planning application will be expected to be accompanied by a Transport Assessment and Travel Plan.

It is imperative that the Transport Assessment and Travel Plan are assessed completely, adequately and to a high standard and that these are overseen by and conducted to the satisfaction of Oxfordshire County Council. There should also be input from the Community Liaison Committee. The developer will be keen to minimise any 'residual impacts' on the highway network and local roads to reduce costs and improve financial viability.

As previously described in 'Commuting into Oxford' the local roads around LnBB, particularly the Woodeaton and Elsfield Roads leading into Marsh Lane to the west and the Bayswater Road and Shepherd's Pit Road to the east are at capacity with extremely lengthy queues and excessively long journey times for those commuting or journeying into Oxford. As there is no alternative mode of travel it must be ensured that sufficient alleviation is provided by the developers to ensure capacity is increased. The ring road and Headington roundabout is near capacity and is very likely also to need alleviation.

Policy STRAT13: Land North of Bayswater Brook 2 (vi) page 73 –

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

Suitable transport infrastructure alleviation policies must be agreed with Oxfordshire County Council and in consultation with the Community Liaison Committee for any road listed in TA 3. above where the road will become near capacity or traffic flow significantly increased by 2040.

The timing of the construction of any transport alleviation infrastructure needs to ensure that they are in place long before any highway or road becomes near capacity.

The transport infrastructure costs need to be properly and fully assessed to the satisfaction of Oxfordshire County Council.

Using these new approved transport infrastructure costs an updated financial viability assessment needs to be produced which also includes updating of all other costs and inclusion of all additional costs previously missing as outlined in the "FINANCIAL VIABILITY OF LAND NORTH OF BAYSWATER BROOK"

It is a requirement in the Local Plan that -

Policy STRAT13: Land North of Bayswater Brook page 73 2 (vi) *"As a first priority, these should provide high quality pedestrian, cycle and public transport connections into Oxford to maximise the number of trips made by non-car modes, and measures to discourage car based development....."*

- 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;*

NICE The National Institute for Health Care Excellence is an executive non-departmental public body of the Department of Health in England. Its role is to improve outcomes for people using the NHS and other public health and social care services by -

- Producing evidence-based guidance and advice for health, public health and social care practitioners.
- Developing quality standards and performance metrics for those providing and commissioning health, public health and social care services.
- Providing a range of information services for commissioners, practitioners and managers across health and social care.

NICE has produced guidelines on “Physical Activity and The Environment” - [NG90] Published date: 22 March 2018.⁴² This guideline covers how to improve the physical environment to encourage and support physical activity. The aim is to increase the general population’s physical activity levels and it supports the local Active Travel initiative.

The guidelines should be incorporated into the site plan for LnBB. The most relevant are shown in the Mitigation Policy TA 5. Below.

These guidelines should be followed when planning LnBB

1.1 Strategies, policies and plans to increase physical activity in the local environment -

1.1.1 Develop and use local strategies, policies and plans to encourage and enable people to be more physically active. Use information from sources such as the joint strategic needs assessment and local cycling and walking implementation plans. Follow established best practice to ensure everyone's needs are identified and addressed, including those of people with limited mobility. [2018]

Take account of the views and needs of people with limited mobility who may be adversely affected by the design and maintenance of streets, footways and footpaths and urban and rural public open spaces.

Take account of the views of voluntary and community sector organisations.

1.1.3 Develop and put policies into place to ensure people with limited mobility can safely move along and across streets and in public open spaces:

- Adopt a consistent approach to permanent or temporary obstructions. This may include vegetation, vending boards, bins, parked cars, scaffolding and street furniture.
- Ensure that there are enough pedestrian-controlled crossings, and that they all incorporate accessibility features. Also ensure that signal-controlled crossings give enough time to cross the road safely.
- Provide accessible temporary crossings during street and road works (see the Department for Transport's Safety at street works and road works).
- Use and maintain tactile paving and dropped kerbs correctly (see the Department for Transport's guidance on the use of tactile paving surfaces).

⁴² <https://www.nice.org.uk/guidance/ng90/chapter/Recommendations>

- Provide step-free access or, where this is not possible, clearly signposted accessible alternatives. [2018]

1.1.4 Ensure planning permissions always prioritise the need for people (including people with limited mobility) to be physically active as a routine part of their daily life, for example ensuring access on foot to local services such as shops and public transport stops.

1.1.6 Use existing health impact assessment tools to assess in advance what impact (both intended and unintended) any proposed changes are likely to have on physical activity levels. For example, will local services be accessible on foot, by bike, and by people with limited mobility? Make the results publicly available and accessible. [2018]

1.2 Active travel

1.2.2 Increase physical activity associated with using public transport services. This includes encouraging use of these services by:

- Ensuring available services are reliable, particularly in rural areas where public transport may be more limited.
- Making information about public transport services accessible to people with visual and hearing impairments, for example provide spoken and visual announcements about destinations and stops on board services, and at stops and stations.
- Making public transport physically accessible to everyone (see the Department for Transport's guidance on inclusive mobility).
- Improving public transport to parks and other green and blue spaces. [2018]

1.2.3 Ensure new and refurbished footways, footpaths and cycle routes link to existing routes and improve the connectivity of the network as a whole. Aim to make it as easy as possible for people to walk, cycle or use other forms of active travel rather than making short journeys by car. This includes journeys between residential areas and:

- public transport stops and stations
- places of work
- public open spaces
- schools, colleges and early years settings
- healthcare services
- shops, and leisure sites. [2018]

1.2.4 Ensure footways, footpaths and cycle routes are convenient, safe and appealing to users, and are built and maintained to a high standard. For example, ensure:

- they are even and do not include any hazards, for example from tree roots, pot-holes, broken paving slabs or seasonal and weather-related obstructions
- they have enough lighting to make people feel secure
- they are free from permanent or temporary obstructions, where possible (see recommendation 1.1.3)
- they are not hidden by overgrown or poorly managed vegetation
- they have clear signs to help people find their way.

- Work in association with relevant third sector organisations and volunteers to plan and carry out this work.

1.2.6 Improve cycling infrastructure using information from people who walk, cycle, and drive in the local area, including those with limited mobility (see recommendation 1.1.2). Improvements may include:

- establishing cycle lanes, tracks and trails in line with best practice
- installing secure cycle parking facilities in public places, on public transport and at public transport stops. [2018]

1.2.7 Make it as easy as possible for people with limited mobility to move around their local area, and work with relevant third sector organisations to achieve this. For example:

Ensure footways:

- have even, non-reflective, anti-glare surfaces
- are free from unauthorised and unnecessary obstructions (whether permanent or temporary) including being free from pavement parking (see recommendation 1.1.3)
- are set back from traffic, if possible (for example, by a grass verge).

Ensure footways that have a kerb clearly define the kerb with a change in level (apart from pedestrian crossings).

- Ensure pedestrian crossings have flush kerbs and tactile paving (see the Department for Transport's guidance on the use of tactile paving surfaces).
- Ensure signal-controlled crossings have tactile rotating cones and, if appropriate, an audible beep, and give enough time to cross the road safely.
- Ensure tactile paving is correctly installed and maintained where it is needed, for example at all crossing places, at the top and bottom of stairs, on the edge of railway platforms and on shared use routes (see the Department for Transport's guidance on tactile paving surfaces).
- Ensure seating is provided at regular intervals along footways that are key walking routes (see the Department for Transport's guidance on inclusive mobility). [2018]

1.2.8 Improve routes that children, young people and their families and carers use, or could use, for active travel to school, college and early years settings. Focus on improving safety, accessibility, connectivity, sustainability and appeal to users. [2018]

1.2.9 Consider improving access routes to school, college and early years settings by:

- improving footways and pedestrian crossings (see recommendations 1.2.4 and 1.2.7)
- introducing measures to reduce vehicle speed (see NICE's guidelines on air pollution: outdoor air quality and health and unintentional injuries on the road). [2018]

5.3.7.1. Pedestrian Connections

The first priority is to maintain current pedestrian walkways, footpaths and bridleways and connections, ensure they remain safe for pedestrians and are separated from roadways and

traffic. The Local Plan STRAT 13 3. states - *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,*

The map below shows a diagram of the proposed 'Link Road' from the original Plan. This is a bypass road. In addition, there would also be site roads to connect homes and give access to road networks.

Currently there are a number of footpaths and bridleways shown on the Map below. A bridleway runs from the B4027 south towards Barton and then turns west through Wick Farm near the Well House and then continuing south past the mobile home park to and over the Bayswater Brook. Between the brook and Well House it is a track used by vehicles to access the Wick Farm site. This and a smaller bridge to access Lower Farm are currently the only bridges over the Bayswater Brook capable of taking light vehicular traffic. There is a further foot bridge beyond Lower Farm, where footpaths meet. These footpaths must be maintained and where they meet a road, either a site road or the 'Link Road' must ensure safety for pedestrians, cyclists or equestrians.



Blue Arrows indicate where footpaths and bridleways have been cut off by the ring road preventing access to and from Oxford and need to be restored

Figure PC 1. MAP SHOWING BRIDLEWAYS AND FOOTPATH CUT OFF BY A40

The PLAN TTP6 Indicative Bus Access Routes page 63 of the Pegasus Hearing Statement⁴³ shows the use of the bridleway from the Well House at Wick Farm to Barton Village Road, which is also used as an access drive to Wick Farm and the mobile home park as the major access roadway from LnBB to Barton using the only existing bridge over the Bayswater Brook.

⁴³

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1269378365&CODE=6D3FBBF99865E400814B3B117DA43220

Use of this bridleway as a major roadway carried considerable safety concerns. It must be ensured that pedestrians, equestrians and cycles can use it in safety.

If existing footpaths and bridleways are to be used by or crossed by vehicles, provision must be made to the satisfaction of Oxfordshire County Council and the Liaison Committee to ensure safe use for pedestrians, equestrians and cyclists.

Existing footpaths across the A40 Northern bypass Oxford ring road have been cut off by earlier development as shown in the map above, by the blue arrows. This restricts access for pedestrians and cyclists to Oxford, the hospitals and anywhere on the other side of the A40 towards Oxford. A pedestrian footbridge and cycleway is required over the ring road to allow 'connectivity' as set out in the Local Plan. This should be sited between the underpasses near the Headington roundabout and the Marston flyover junction. The more western footpath shown the map above with a blue arrow has been cut off and would be a good site for the pedestrian and cycle bridge as it is midway between existing crossings of the A40 and LnBB and also relinks the footpaths on both sides of the ring road. This allows connectivity between LnBB and the John Radcliffe hospital complex.

The A40 Northern Bypass ring road is a barrier to connectivity between LnBB and parts of Oxford inside the ring road. A pedestrian and cycle bridge is specified in the Local Plan. This also states STRAT 13 3.

iii) develops a transport and movement hierarchy which promotes non-car modes of travel and permeability across the site ensures appropriate highways and sustainable transport access and permeability across the site, including between Bayswater Road and the B4150 Marsh Lane/ A40 junction;

This indicates the need for the pedestrian and cycle bridge over the ring road, Northway to be situated mid-way between the Marston/Elsfield junction and the underpass near the Headington roundabout to give effective access. Developer's plans for another bridge next to or near the Marston junction in the Pegasus Hearing Statement, would be pointless as this already has a cycleway and pavement. It would not improve connections and would not give direct access to the John Radcliffe hospital site.

A. Safety and Crime Prevention

Pedestrians and cyclists need to have confidence in their safety at all times. The BRE briefing paper "Reducing Crime Hotspots in City Centres"⁴⁴ This report stresses the importance of surveillance and good design to reduce crime. This report recommends –

Route solutions

It is important that the main routes into a city centre provide a good first impression of the city. They should be clean and all poor environmental cues such as graffiti, broken windows and damaged street furniture should be removed.

It is preferable to provide primary routes that lead pedestrians in and out of town and city centres; these should have high profile patrols, CCTV and improved lighting to encourage

⁴⁴ <https://www.bre.co.uk/filelibrary/Briefing%20papers/102417-Crime-Hotspots-Briefing-Paper-v4.pdf>

people to use them and to increase feelings of safety. Footpaths should be wide and straight and be overlooked by buildings and activities. Potential hiding places for offenders should be avoided, for example, restricting plant height to a maximum of four feet. The main routes should be well lit to increase surveillance and decrease anonymity and fear of crime. Under-used footpaths, shortcuts and minor access points can be vulnerable to criminal activity and fear of crime and should be avoided wherever possible. It is preferable to reduce permeability; as previously discussed, offenders prefer areas where they feel anonymous and can blend into the background and not be noticed.

B. Underpasses

There are two existing underpasses near Wick Close under North Way, the ring road, and another near the Headington roundabout. This is mentioned in the Pegasus Hearing Statement page 61. However, this is not compliant with BRE recommendations.

The BRE report goes on to discuss underpasses and described some as –

“Many examples of underpasses that were crime hotspots and associated with high levels of fear of crime were found in this research..... examples of two underpasses in city centres. Both were dark, had blind corners, were poorly maintained and contained graffiti.”

The report goes on to recommend -

Underpass solutions

Wherever possible, pedestrians and vehicles should be kept on the same level and underpasses removed. But if an underpass is considered to be necessary, it should be as straight, short and as wide as possible. It should also be well lit, with clear lines of sight so that pedestrians can see what is ahead. Ambiguous spaces, such as gaps and corners should be avoided as they can provide hiding places for potential offenders and can increase fear of crime. Underpasses should be maintained in good order and monitored on a regular basis. They should be free from rubbish and any graffiti removed as soon as possible

5.3.7.2. Cycleways

It can be seen from the LCWIP map below (figure C 1.) that there are currently no formal cycleways near the LnBB site. There is an informal ‘connecting route’ using existing roads in the Barton estate. The map does show a ‘quiet route on a road’ along part of the Elsfield Road, but this is a narrow road with no provision for cycles. The Oxford Local Cycling and Walking Infrastructure Plan⁴⁵ does not extend beyond the ring road. It is improving infrastructure within Oxford, but this does not contribute to connectivity to Oxford.

The Greenways Cycling project for Oxfordshire has no plans to extend cycleways to the east in the parishes affected by STRAT 13 (LnBB). It shows the Elsfield Road as a cycle route to be improved. There is currently no timetable or budget for this. There is no practical way of

⁴⁵ https://mycouncil.oxfordshire.gov.uk/documents/s50199/CA_MAR1720R09%20-%20Annex%201%20Oxford%20LCWIP.pdf

improving this route for cyclists, as the road is too narrow and has no pavements. See Figure C 2. Greenways map.

The Pegasus Hearing Statement shows no new cycleways.

If a low car policy is to be pursued it is important that safe cycle connections are available as a route to the major destinations that new residents might wish to travel to. These would include –

- The John Radcliffe Hospital
- Other hospitals in Oxford – The Churchill, The Warford, The Nuffield Orthopaedic
- Headington
- Oxford Brookes University
- Central north Oxford – Summertown, central Oxford
- Colleges in central Oxford
- Cowley
- Parish facilities – the church, village hall, farm shop, countryside
- Science Park
- Business Park

There are no dedicated cycleways in Barton, Barton Park or the parishes surrounding them. There are cycleways on the inside (Oxford side) of the ring road and along the A40 from the Headington roundabout to Wheatley. There needs to be dedicated safe cycleways to –
Connect safely each end and the middle of LnBB site with

- The Marston/Elsfield junction for Summertown and central Oxford
- A central cycleway to the JR – with a bridge over A40 Northern Way Ring Road
- A cycleway to Headington
- A cycleway into the countryside along the Bayswater Road towards Beckley and Stanton St John

The adopted local Plan states -

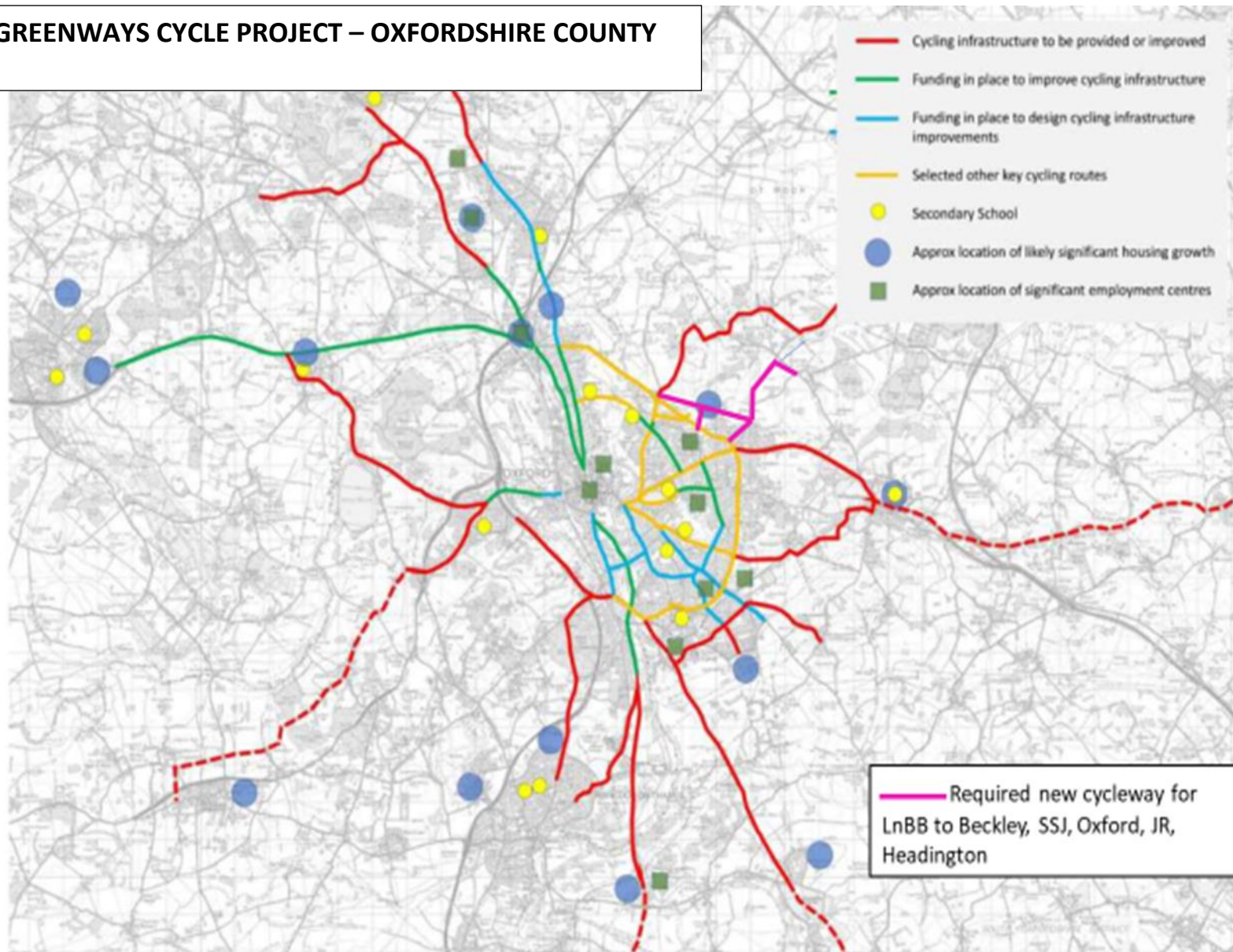
3.113 Development would need to provide on-site and offsite pedestrian, cycle and public transport connections to Oxford city centre and other key employment locations (such as the John Radcliffe Hospital and Oxford Science and Business Parks).

The need for these cycle routes is substantiated by the spatial strategy of the SODC Local Plan where the reason given for the LnBB site on the edge of Oxford is to meet Oxford's 'unmet housing need' for people who work in Oxford. In their response to the Regulation 19 consultation Christ Church the owners of LnBB included letters from the Oxford Hospitals NHS Trust and the university saying housing was needed for their staff and a response from the site promoters that this would be provided.

Oxford Cycle and Walking Network for LCWIP



Figure C 2. GREENWAYS CYCLE PROJECT – OXFORDSHIRE COUNTY COUNCIL



5.3.7.3. Buses

There are two bus companies currently serving Barton and Sandhills – Stagecoach and the Oxford bus company. Stagecoach’s map shows one route around Barton and into the centre of Oxford Via Headington ⁴⁶ The timetables show buses every 10-15 minutes at peak times starting at 05.44 in the morning from Barton with the two bus companies alternating until 23.19⁴⁷, the last bus. Returning to Barton services start at 5.25 and end at 23.55⁴⁸. The timetable estimates the journey time is 30 minutes, however in reality this can be nearer 1 ½ hours at peak times. There is no night service or service to any other location, including the hospitals.

TRA 06.6 Evaluation of Transport Impacts- Stage 3 5c Addendum (updated on 22 July 2020) ⁴⁹ outlines a new bus route from Barton to Oxford City Centre 3 times per hour, but nothing to secondary and SEND schools, Cowley and the Business and Science Parks. As the road networks within the site do not appear to connect to Barton or Barton Park there would be a possibly considerable walk to a bus stop?

5.3.7.4. Taxis

There is no Uber service in Oxford. Taxi services from Oxford to destinations outside the ring road are very expensive. One quote was £55 for 2 people from Barton to Oxford bus station return. This is a considerable disincentive for residents at LnBB not to have cars.

⁴⁶ <https://tiskon-maps-stagecoachbus.s3.amazonaws.com/ZoneMaps/Oxford/SmartZone%20map.pdf>

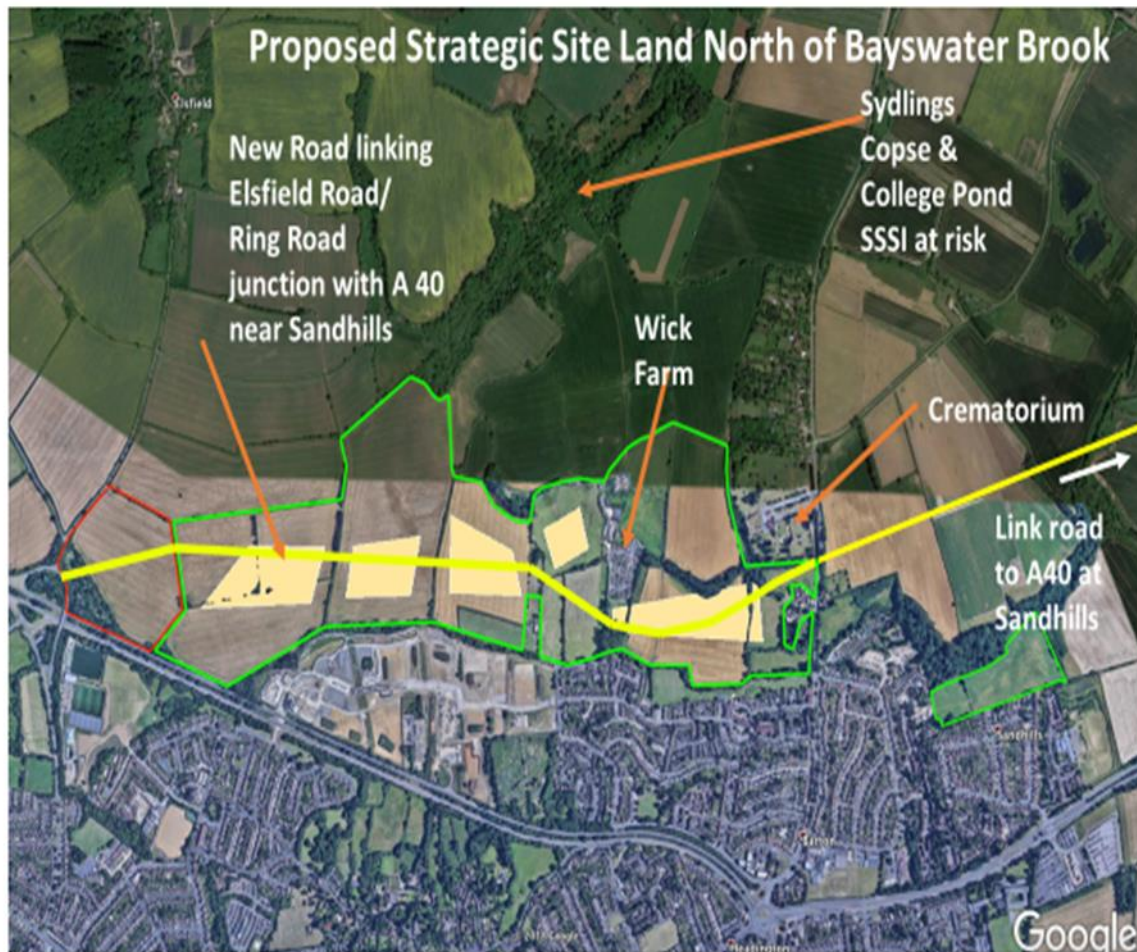
⁴⁷ https://tiskon-maps-stagecoachbus.s3.amazonaws.com/Timetables/Oxford_Timetables/8_current.pdf

⁴⁸ https://assets.goaheadbus.com/media/cms_page_media/8103/2020.08.30_OBC_city8-9_-_COVID-19_Coronavirus_Timetable_V3.pdf

⁴⁹

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190525&CODE=753BC786212096D46DA9BD78C4884A91

5.3.8. Concerns about the 'Link Road'



30 Figure LR 1. SHOWING THE 'LINK ROAD' FROM THE ELSFIELD JUNCTION OF THE OXFORD RING ROAD, THROUGH THE DEVELOPMENT ACROSS THE BAYSWATER ROAD AND ON TO ITS JUNCTION WITH A40 NEAR SANDHILLS

It is highly likely that significant transport infrastructure construction will be required to alleviate traffic on the ring road, Headington roundabout and surrounding local roads. Local roads are already over capacity causing very lengthy journey times and significant congestion. Oxford City Council in their Hearing Statement said *"there are capacity issues"* around the ring road Northern Bypass, and particularly at the Headington, Cutteslowe and Wolvercote roundabouts. A 'Link Road' - Headington roundabout bypass is outlined in the original Local Plan.

The objective of the 'Link Road' -

TRA 6.4 Atkins Evaluation of Transport Impacts Version 3.0 2nd January 2019⁵⁰ *"Junctions along the A40 at Headington are forecast to experience some relief from congestion, as the A40 link road is forecast to attract general traffic away from Headington roundabout. This is likely to result in an increase in average speeds along this corridor during both morning and evening peaks compared to the Do Minimum scenario".*

Sections 5.3.2., of the same report state that development at LnBB is *"likely to result in increased congestion along the links leading to the A40"* 5.6.2., *"increased congestion along the adjacent A40 link"* 5.9.2 *"increased congestion along the adjacent A40 link. Increased network stress is also forecast at Headington which may be related to the Wheatley development. The Headington interchange is forecast to remain over capacity"*. All forecast over capacity of the Headington roundabout.

The only detail about the ring road can be found in TRA 6.4 5.10. Scenario 5B page 66 -

"A40 Link Road, 40 mph single carriageway,"

The 'Link Road' is to be a *"40 mph single carriageway"* to relief congestion from the Headington roundabout and ring road. It is shown on Figure TA 3. The traffic on the ring road consists of private cars, vans, HGVs etc. This mix of heavy traffic travelling at 40 mph is not suitable for a housing estate road and the 'Link Road – Headington roundabout bypass traffic must be kept completely separate from the LnBB housing estate traffic for safety.

The Department for Transport Traffic Statistics data shows the traffic data for the northern ring road in 2019 ⁵¹ show the annual average daily flow to be 34,515 vehicles. Of these 1,753 (5.1%) were HGVs, 367 (1.1%) LGVs, 74 (0.2%) were buses and coaches the majority being cars and taxis. There is no data for the Headington roundabout itself, but data from the Risinghurst⁵² section of the ring road shows very similar figures. However, the possibility of so many HGVs using the 'Link Road' is not acceptable and safe for an estate road.

⁵⁰

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190523&CODE=753BC786212096D4FA1C25DE121849AE

⁵¹ <https://roadtraffic.dft.gov.uk/manualcountpoints/56381>

⁵² <https://roadtraffic.dft.gov.uk/manualcountpoints/77438>

SCHEMATIC MAP OF PROPOSED DEVELOPMENT LAND NORTH OF BAYSWATER BROOK

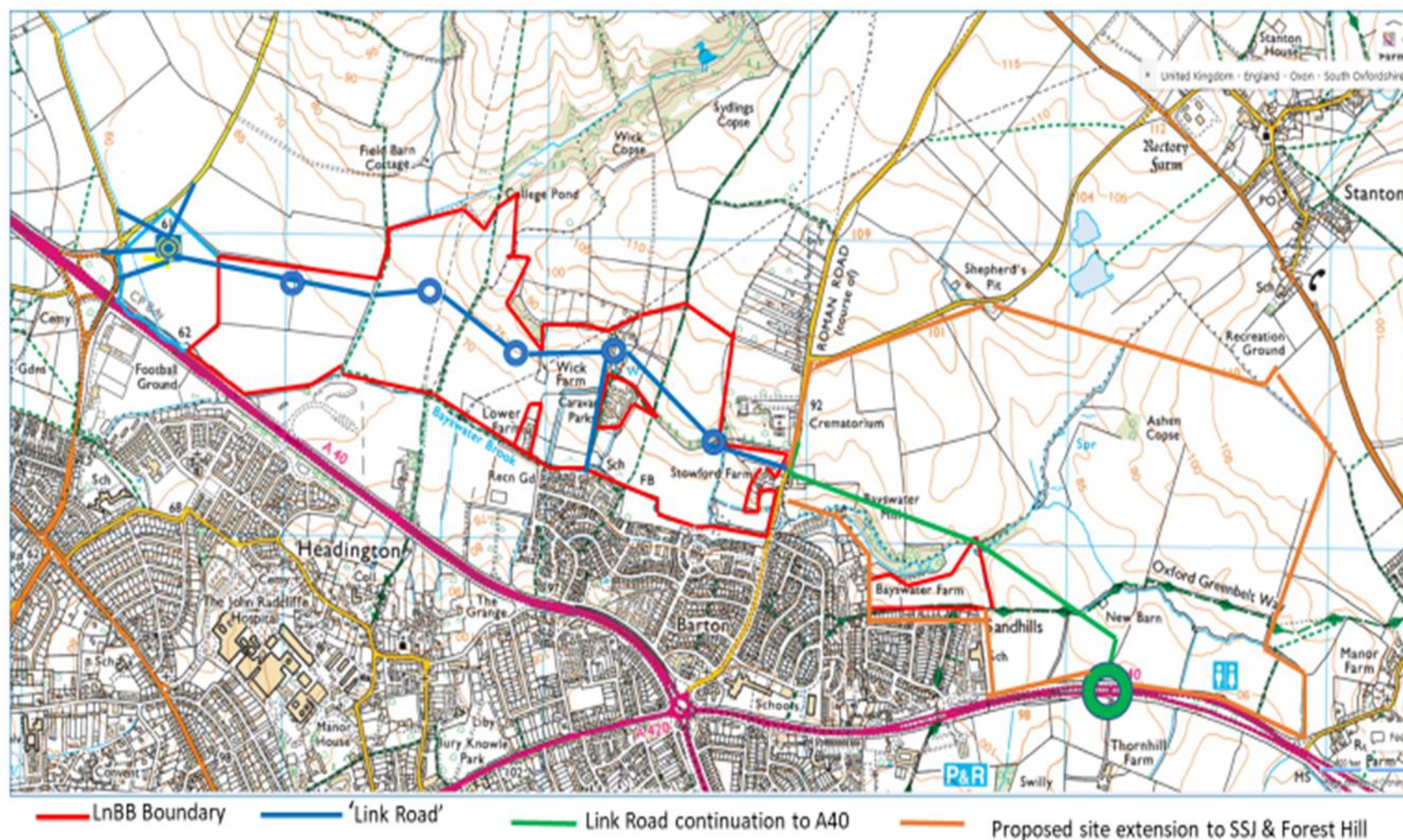


Figure LR 2. above is a schematic diagram showing the envisaged housing estate roads from the Pegasus Hearing Statement with a number of roundabouts and the junction into the Elsfield and Woodeaton Roads and Marsh Lane. Notably there is no information from Pegasus or SODC on the junction with the A40 between Sandhills and Forest Hill. It should also be noted that the eastern 'Link Road' between the Bayswater Road and A40 at Sandhills will cross an important cycleway from Wheatley/Holton to the Headington roundabout used by school children and others.

It is quite clear that a series of roundabouts on a service road in a housing estate is not suitable for a 'Link Road' – Headington roundabout bypass. There has been no information on the 'Link Road' from the Bayswater Road to the A40 between Sandhills and Forest Hill.

If the 'Link Road' has a junction with the Bayswater Road it is very likely to be used as a "rat run" through Forest Hill, Stanton St John and Horton cum Studley. The roads are already at capacity and it would not be safe for HGVs etc to use these roads apart from access.

The Department for Transport Manual for Streets⁵³ distinguishes streets i.e., the estate roads in LnBB from roads i.e., the 'Link Road' -

"The key recommendation of the Manual is that increased consideration should be given to the 'place' function of streets. This function is essentially what distinguishes a street from a road, where the main purpose is to facilitate movement. Streets have five principal functions in all. In addition to those of place and movement, streets need to allow for access, they often need to provide room for parking, and they must accommodate drainage, utilities and street lighting."

The full manual gives ⁵⁴guidance on the successful design of streets to meet people's needs and clearly shows the distinction between a street and the 'Link Road' – the Headington roundabout bypass road.

"Poor air quality is associated with adverse health effects, including asthma attacks, reduced lung function, and admissions to hospital. As a society we need to think long-term and air pollution: outdoor air quality and health" - NICE⁵⁵

It is also well documented that heavily used roads such as bypass roads contribute significantly to poor physical and mental health, including sleep disturbance. The noise from traffic has been shown to be detrimental to health. According to WHO traffic noise contributes to heart attacks and strokes. Noise from major roads and bypasses will disturb sleep and generally cause a nuisance and annoyance all the time. The proximity of houses and villages to the proposed new link/bypass road will mean that there will be considerable

⁵³ Manual For Streets Summary Document -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3892/mfssummary.pdf

⁵⁴ Manual For Streets -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

⁵⁵ <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations#planning>

noise pollution. It is important to comply with both NICE Guidelines on siting of schools and homes near bypass roads.

Air Pollution: Outdoor Air Quality and Health, NICE Guideline [NG70] Published date: 30 June 2017⁵⁶ - This guideline covers road-traffic-related air pollution and its links to ill health. It aims to improve air quality and so prevent a range of health conditions and deaths.

This includes –

Providing charge points for electric vehicles in workplaces, commercial developments and residential areas.

Supporting car sharing schemes or car clubs.

1.1.2 When 'plan making' consider:

- *siting and designing new buildings, facilities and estates to reduce the need for motorised travel*
- *minimising the exposure of vulnerable groups to air pollution by not siting buildings (such as schools, nurseries and care homes) in areas where pollution levels will be high*
- *siting living accommodation away from roadsides*
- *avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time*
- *including landscape features such as trees and vegetation in open spaces or as 'green' walls or roofs where this does not restrict ventilation*
- *including information in the plan about how structures such as buildings and other physical barriers will affect the distribution of air pollutants.*

1.1.3 If the local plan does not address air pollution, consider developing local guidance (such as supplementary planning documents, see the Department for Communities and Local Government information on local plans) on how to design buildings and spaces to improve local air quality until the local plan is amended.

1.2 Development management

1.2.1 Consider ways to mitigate road-traffic-related air pollution. This could include:

- *Taking action to reduce the number of motorised trips. For instance, by:*
 - *incorporating air quality outcomes in travel plans*
 - *developing local parking plans*
 - *supporting car clubs*
 - *supporting active travel (see NICE's guideline on physical activity: walking and cycling).*
- *Supporting the use of zero- and low-emission vehicles for instance, by providing charging facilities for electric vehicles.*
- *Managing street trees and vegetation to reduce the risk of restricting street ventilation, where this may contribute to poor air quality (for instance, by the choice of species, siting and pruning regimes).*

⁵⁶ <https://www.nice.org.uk/guidance/ng70/chapter/Recommendations>

1.2.2 In consultation with local communities, consider including air quality monitoring and measures to reduce road-traffic-related emissions in the Regulation 123 list of funding options for using the Community Infrastructure Levy

1.3 Clean air zones

1.3.1 Consider introducing a clean air zone that:

- includes restrictions or charges on certain classes of vehicle
- supports zero- and low-emission travel (including active travel)
- includes targets to progressively reduce pollutant levels below EU limits and aim to meet World Health Organization air quality guidelines
- aims to reduce exposure to air pollution across the whole zone rather than focusing on air pollution hotspots.

1.3.2 Identify which classes of vehicles to restrict or charge in a clean air zone (see recommendation 1.3.1) based on an understanding of local conditions (such as local sources of road-traffic-related pollution and factors influencing dispersion). Use nationally recognised vehicle types (such as the Euro classification for diesel and petrol vehicles).

1.3.3 Work across local authority boundaries to address regional air pollution and prevent migration of traffic and emissions to other communities, resulting in areas of poor air quality.

1.3.4 Consider support for zero- and low-emission travel. This could include:

- Encouraging walking and cycling (see NICE's guideline on physical activity: walking and cycling).
- Encouraging uptake of zero- and low-emission vehicles, for instance:
 - Providing electric charging points.
 - Encouraging public and private sector organisations to use zero- or low-emission vehicles for deliveries to retail, office, residential or other sites in the zone, particularly for the last mile of deliveries in city centres.
- Developing integrated public transport networks (including park and ride schemes) based on low-emission vehicles.

1.3.5 Consider taking action to reduce emissions within the clean air zone. For instance:

- Introducing fuel-efficient driving initiatives including:
 - Bylaws and other action to support 'no vehicle idling' areas, particularly where vulnerable groups congregate (such as outside schools, hospitals and care homes) and in areas where exposure to road-traffic-related air pollution is high.
 - Driver training to reduce emissions (see section 1.4).
 - Actions to smooth traffic flow (see section 1.5).
- Action to minimise congestion caused by delivery schedules.
- Using a fleet recognition scheme (such schemes help fleet operators improve efficiency by reducing fuel consumption and emissions: the system recognises operators who meet best operational standards).
- Addressing emissions from public sector transport activities (see section 1.4).
- Specifying emission standards for private hire and other licensed vehicles.

1.3.6 Where traffic congestion is contributing to poor air quality, consider incorporating a congestion charging zone within the clean air zone.

1.3.7 Consider monitoring outside the zone to identify whether its implementation is causing problems in terms of traffic composition and flow. If so, address any issues identified. For instance, by changing the boundaries to address increased pollution at the margins of the zone or problems caused by diversion of traffic.

1.3.8 Assess the impact of any proposed charges (including exemptions for zero- and low-emission vehicles) on vulnerable groups.

1.5 Smooth driving and speed reduction

1.5.1 Consider promoting a smooth driving style by using:

- speed limits and average speed technology on the roadside
- real-time information to tell drivers what the current optimum driving speed is
- 20 mph limits without physical measures to reduce speeds in urban areas where average speeds are already low (below around 24 mph) to avoid unnecessary accelerations and decelerations
- signs that display a driver's current speed to reduce unnecessary accelerations.

See also recommendations 1.4.1 and 1.4.2.

1.5.2 Where physical speed reduction measures are used to reduce road danger and injuries (20 mph zones – see NICE's guideline on unintentional injuries on the road), consider using them to encourage drivers to maintain a reduced, steady pace along the whole stretch of road, rather than road humps that may increase acceleration- and braking-related emissions.

1.6 Walking and cycling

1.6.1 Provide support for active travel (see NICE's guidelines on physical activity: walking and cycling and physical activity and the environment).

1.6.2 Provide a choice of cycle routes, including routes that avoid highly polluted roads. Ideally use quiet streets or segregated routes.

1.6.3 Where busy roads are used consider:

- Providing as much space as possible between the cyclist and motorised vehicles.
- Using dense foliage to screen cyclists from motor vehicles, without stopping air pollution from dispersing or reducing the visibility or safety of cyclists near junctions. Also take into account concerns about personal safety.
- Reducing the time cyclists spend at highly polluted sites, including some junctions, where this can be done without increasing the time that other groups spend exposed to poor air quality.

5.4. PROTECTION OF THE SSSI - SYDLINGS COPSE AND COLLEGE POND

Sydling's Copse and College Pond is an important and fragile SSSI site spanning 22 hectares in the parish of Beckley and Stowood, 3 ½ miles north east of Oxford. Most of the site is owned by BBOWT – Berks, Bucks and Oxfordshire Wildlife Trust, and all is managed by them. The site is described in Section 2.9.3. The risk of damage to this fragile site has already been increased considerably by the development at Barton Park of 885 homes, yet to be completed. This is promoted as being next to the countryside with a footpath leading directly from this site to the SSSI.

BBOWT responded with great concern to the regulation 19 consultation⁵⁷ to the SODC Local Plan and this is a conclusion of their response –

Since this was written the revised NPPF (2018) Glossary states:

“Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.”

*On the basis of the above it is clear that at least two of the habitats in Sidling's Copse and College Pond SSSI **definitely meet the definition of irreplaceable habitat – ancient woodland and lowland fen.** And we consider a very strong case could be made that the traditional unimproved grasslands present on the site – the lowland calcareous grassland and the acid grassland meet the definition of irreplaceable habitat as well.*

We have set out above how fragile these habitats are and how the indirect impacts of the proposed allocation are highly likely to result in their loss or deterioration. The NPPF wording is then clear:

“..... should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;”

We do not consider that there are wholly exceptional reasons for this allocation. This allocation is not a project of exceptional national importance. There are other sites available in South Oxfordshire for housing. This allocation should therefore be removed from the South Oxfordshire Local Plan.

We consider that unless the allocation is removed the South Oxfordshire Local Plan will be unsound on the basis of:

- Not justified: we do not consider that in including this allocation the plan is making an appropriate strategy, or taking into account reasonable alternatives.*
- Not effective: as we believe that further work would demonstrate that this allocation is not deliverable whilst abiding by planning policy.*
- Not consistent with national policy;*

It is not consistent with parts a, b or c of NPPF paragraphs 175.

In this case, due to exceptionally serious impacts on biodiversity that would result from this allocation as set out above, we consider the only reasonable Modification is the removal in its entirety of the allocation.”

⁵⁷

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1173196196&CODE=420A2633CC0A7D8E92642BEE8F021326

Natural England in their Regulation 19 response⁵⁸ also considered the LnBB site to be unsound.

“Site Allocations

North of Bayswater Brook allocation: Natural England consider this allocation to be unsound, an assessment would be needed to demonstrate that 1,100 homes can be allocated here without impacts on the SSSI from hydrological changes or recreational pressure.

Their recommendations -

- *A desktop hydrological assessment should be undertaken*
- *An assessment of the likely recreational pressure is needed*
- *Liaison with BBOWT*
- *Avoidance measure should be investigated*
- *If the impacts are unavoidable mitigation should be identified and any effect on the housing capacity of the site assessed”*

It appears that none of these recommendations have been actioned.

In their ‘Hearing Statement’ BBOWT⁵⁹ states – *“In this case, due to the exceptionally serious impacts on biodiversity that would result from this allocation as set out above, we consider the only suitable modification is the removal in its entirety of the allocation.”*

NAT 14 Ecological Assessment of Sydlings Copse and College Pond SSSI March 2019
AECOM⁶⁰ has a major conflict of interest. AECOM have carried out consultancy work for some years for developers of parts of the proposed strategic site LnBB and at the same time as submitting this report for SODC AECOM also wrote and submitted the Regulation 19 submission for the developers of Bayswater Farm (Buswell and Buchanan ^{61 62}). The report is considered to be poor, with very questionable methodology that appears to benefit the developers.

Location

It stated that the Sydlings Copse and College Pond is in the parish of Barton. It is not. It is in the parish of Beckley and Stowood.

⁵⁸ https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1173206955&CODE=46CAF8589BD48E6DE8AAEA11F9CAEAFB

⁵⁹ https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204256&CODE=1F0E97FEB6867DBCDA84999B8372DC1

⁶⁰ https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283190480&CODE=96FAD849B5185AA19CA170696093EFE4

⁶¹ http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1173197418&CODE=24B1D7E0ADA4AC88DD463C04AFD74A29

⁶² letter

http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1173197423&CODE=24B1D7E0ADA4AC880DFE7500DFED23AF

Methodology

The methodology is flawed. There was no assessment of the importance of this site and SSSI. The 'research' was carried out on one day in February when most of the flora is not in growth and cannot be seen. The fauna was not mentioned.

Visitor Numbers

The ecologist "also noted evidence of recreational activity". This is not a valid assessment of visitor numbers, particularly on a cold week day in February. The footpath that 'traverses College Pond' to the south had been closed at one end due to the building at Barton Park. It has now reopened and is used much more, particularly by the residents of the new development at Barton Park, where the SSSI has been promoted. The bridleway from Beckley to Barton and Wick Farm is exceedingly well used, especially recently and particularly at weekends and in good weather. The recent COVID-19 restrictions have made this SSSI extremely popular and it has been discovered by many more people. It tends to be accessed from the south on foot and from the north by foot and car. The number of cars parked on the B4027 to walk there has been as many as 15 per hour during the weekends therefore equating to over approximately 100 visitors each day over the weekend, with many others walking to the site.

Furthermore, the author of this report has stated in writing that he did not have sight of the report on visitor numbers cited in this report, which in any case was undertaken many years ago and is out of date. This report does not appear to exist.

A proper study of visitor numbers needs to be undertaken, but this will only increase with the proximity of Barton Park, which has yet to show its full impact and those discovering this SSSI during COVID-19 restrictions.

Potential Damage from Domestic Cats

While mentioning dog walkers it fails to address at all the damage from other domestic pets particularly cats. Cats can cause considerable damage and carnage to fauna on the site and this has not even been stated and no mitigation has been recommended. There would be risk to frogs, toads, birds, snakes to list but a few.

There appears to have no assessment of the potential damage from cats for this potential site or Barton Park. In a specific research paper⁶³ The authors recommend an exclusion zone 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.

⁶³ 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/>

Pollution from Vehicle Emissions

It was stated that air pollution from a road would be “[from vehicle exhaust emissions](#)”, but it is well documented that particulate matter from tyres is also a very harmful pollutant. Noise and vibration from roads were also not mentioned and the proposed ‘Link Road’ through the site would be used by HGVs. The report recommended “[any new roads should be located at least 200m away from the SSSI. It is considered that this would also be a suitable minimum buffer distance to separate any built development from the SSSI.](#)” No evidence is offered as to why 200m is considered safe enough to mitigate all damage from roads and traffic. “To maintain the open setting of the SSSI. AECOM recommends that a 200m ‘[no build](#)’ zone would [provide appropriate separation](#)” however there is also no evidence offered as to why this would be adequate and the argument that this would stop people accessing the SSSI are simply untrue, as our parishioners and those of Barton and beyond know from personal experience. Sydlings Copse is very popular with visitors and the report is completely incorrect about visitor numbers and from exceedingly little evidence. There needs to be a comprehensive and detailed ecological assessment and a survey over a longer period to assess visitor number and impact. A detailed hydrological survey is also required.

The report states –

[“The findings and recommendations outlined within this report will inform any detailed ecological assessment and proposed mitigation strategy required for Stage 2 of the ecological assessment of the potential ecological impacts of the site allocation on Sydling’s Copse and College Pond SSSI”](#)

This report is flawed, unreliable and poor and it is questionable who it is for. A new ecology report is required, with work carried out by an expert ecologist with no conflict of interest. A reliable study of ‘visitor numbers and projections taking into consideration the new development at Barton Park, as well as the proposed development at LnBB needs to be carried out.

Any possible mitigation policies need to be developed with BBOWT and Natural England and must be evidence based taking into account

- Visitor Numbers
- Domestic Cats
- Roadways, particularly the ‘Link Road’
- Pollution

A further Critique from Professor of Ecology David Rogers with comments from Stephen Harris, Druce Curator of Oxford University Herbarai can be found in Appendix 23. This shows the importance of the SSSI site, particularly the fauna, including species on the red list, moths and Hymenoptera, which are not mentioned in NAT 14.

Visitor numbers have been high, particularly in the months of lockdown, over 100 people/day (at weekends) with increasing numbers of visitors from the Barton Park development and from

the potential development at LnBB which will not be mitigated by building a park. Prof Rogers states

“This will not restrict access to the SSSI, but is designed to distract attention away from it.” He concludes “, the incredible assemblages of species in Sydling’s Copse and College Pond SSSI arise from its unique geology, topography and hydrology. These particular assemblages survive and grow only here. Houses can grow anywhere. STRAT13 should be removed from the Local Plan.

The mitigation that is recommended of a distancing of 200 metres for any road is not referenced. The QC for Pegasus stated at the hearing that it was from the Assessment of Road Traffic Emissions on the Habitats Regulations NEA 001 July 2018 para 4.17. page 15⁶⁴ . This states –

4.17 Usually, only those European sites present within 200m of the edge of a road on which a plan or project will generate traffic will need to be considered when checking for the likelihood of significant effects from road traffic emissions (but see also paragraph 4.10).

4.10 With regard to potential risks from road traffic emissions, Natural England and Highways England are in agreement that protected sites falling within 200 metres of the edge of a road affected by a plan or project need to be considered further. This is based on evidence presented in ENRR580 (Bignal et al. 2004⁶⁵) and is consistent with more current literature (Ricardo-AEA, 2016¹¹). However, where (unusually) there is a credible risk that air quality impacts might extend beyond 200 metres from a road, Natural England may advise that additional sites should also be scoped into the HRA.

AECOM stated at the hearing that – *“we need to be clear about the nature and purpose of the AECOM report. This was not and did not purport to be a full ecological impact assessment such as would be required to accompany a planning application.” “provided new roads are located at least 200 metres from sensitive areas there will be no material change in pollution levels at that receptor even if the road in question was a major highway.”*

This statement appears to be at variance with 4.10 above. The prevailing wind is south-westerly and this may result in greater road pollution from a greater distance. Natural England need to advise on any monitoring that may be needed both before and after construction.

Natural England concluded in their Hearing Statement⁶⁶ –

“This [AECOM Ecology] report has identified the need for further survey work and mitigation proposals to inform the Examination, which do not appear to have been submitted to the Examination Library. This information has also not been available to inform site selection and assessment through the Sustainability Appraisal, as referenced in our comments on Matter 5..... it has not been clarified whether development on Land North of Bayswater Brook would

⁶⁴ <http://publications.naturalengland.org.uk/file/5431868963160064>

⁶⁵ <http://publications.naturalengland.org.uk/file/135001>

⁶⁶

https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204297&CODE=1F0E97FEBC6867DBCCB310D83A387BA7

have adverse impact on groundwater feeding the SSSI and whether mitigation is necessary, and neither has it been demonstrated that the identified risk of damage through recreational pressure can be mitigated. Therefore, we do not consider the plan to adequately lay the framework for the sustainable development of this strategic site, nor to adequately consider the impact on Sydlings Copse and Pond SSSI and how this should be addressed”

The recommendations including those from AECOM, Natural England and BBOWT are –

- A study of visitor numbers to the SSSI needs to be undertaken to determine the risk. This needs to be conducted for a number of months, including the peak visitor times in the summer
- A comprehensive assessment of the likely recreational pressure is required.
- A report with mitigation policies on potential damage from domestic cats is required.
- A detailed hydrology survey is required.
- SODC and the site promoters must liaise and work with Natural England and BBOWT
- A reliable high-quality ecology report is required. That from AECOM is flawed and their recommendations cannot be used
- Natural England needs to agree any further work that is required and any further assessments and any research e.g., research pre and post construction on pollutant levels from vehicle emissions as well as particulate matter from tyres etc which are likely to be high from any ‘Link Road’ with HGVs.
- Natural England and BBOWT must agree any mitigation policies and further research requirements with SODC and the site promoters
- A full Ecological Impact Assessment must be completed to the methodology stipulated by Natural England and to their satisfaction

The requirements for further assessments, surveys and research must be agreed with Natural England and will include but not confined to-

- A study of visitor numbers to the SSSI to determine the risk. This needs to be conducted for a number of months, including the peak visitor times in the summer
- A comprehensive assessment of the likely recreational pressure is required.
- A report with mitigation policies on potential damage from domestic cats is required.
- A detailed hydrology survey is required.
- A reliable high-quality ecology report is required. That from AECOM is flawed and their recommendations cannot be used
- Research pre and post construction on pollutant levels from vehicle emissions as well as particulate matter from tyres etc which are likely to be high from any ‘Link Road’ with HGVs.
- A full Ecological Impact Assessment must be completed to the methodology stipulated by Natural England and to their satisfaction

Liaison and Over Sight by Natural England

There has been no agreement with Natural England at the Hearing on LnBB Examination in Public. The Inspector commented that this needs to be put in place.

- SODC and the site promoters must liaise and work with Natural England and BBOWT
- Natural England needs to agree any further work that is required and any further assessments and any research e.g., research pre and post construction on pollutant levels from vehicle emissions as well as particulate matter from tyres etc which are likely to be high from any 'Link Road' with HGVs.
- Natural England and BBOWT must agree any mitigation policies and further research requirements with SODC and the site promoters

A protection zone has been proposed in the ecology report and a park has been proposed by the site promoter Pegasus in their Hearing Statement.

Footpaths

Currently Sydlings Copse is served by a footpath and a bridleway. As shown in Figure SSSI 1. below.

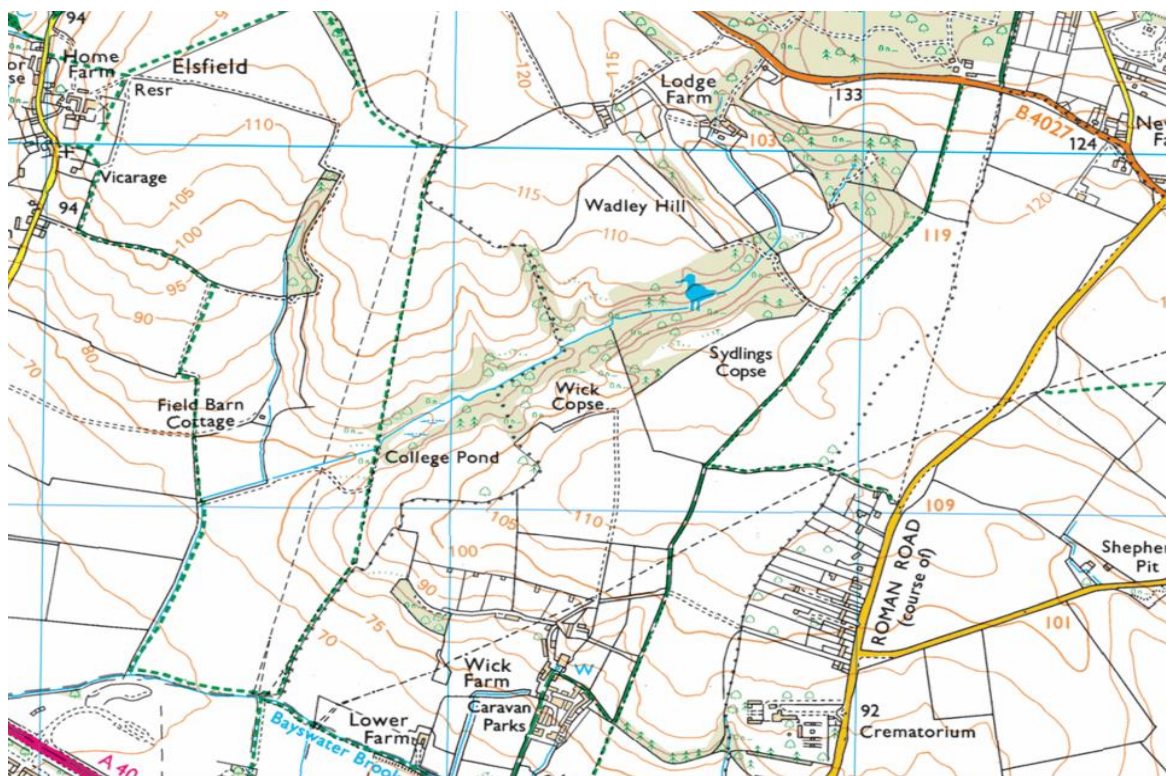


Figure SSSI 1. FOOTPATHS AND BRIDLEWAYS AROUND SSSI SYDLINGS COPSE AND COLLEGE POND

The main access to Sydlings Copse is via a track from the bridleway running from the B4027 at Stowood in the north, to Wick Farm in the south. A footpath runs across the boggy part of the SSSI in the south west from the Bayswater Brook to the Elsfield Road. This footpath is an

almost direct route from both Barton Park and LnBB and would give easy access. The Pegasus (Christ Church) Hearing Statement suggests providing additional footpaths and dog walking circuits and ‘downgrading’ the current footpath at the southern end of the SSSI. This appears to be a sensible suggestion that will benefit the local community, while making a contribution to protecting the SSSI. The proposals for additional footpaths and dog walking routes can be found in the maps on pages Pegasus Hearing statement pages 181-2⁶⁷.

The footpath to the south west of the SSSI provide direct access from Barton Park and LnBB to the SSSI. Pegasus [Christ Church] have proposed downgrading of this footpath and provision of additional footpaths and dog walking tracks as shown in the map “Figure 2: Existing and Proposed PRoW and Recreational Routes Plan” on page 182 of their Hearing Statement.

This proposal would potentially be advantageous to the SSSI and the local communities. This change and additional footpaths should be agreed with Community Liaison Committee, SODC and the County Council.

Agreement should be made with the Community Liaison Committee about the provision and route of new footpaths and dog walking paths as proposed in the Pegasus Hearing Statement map on page 182

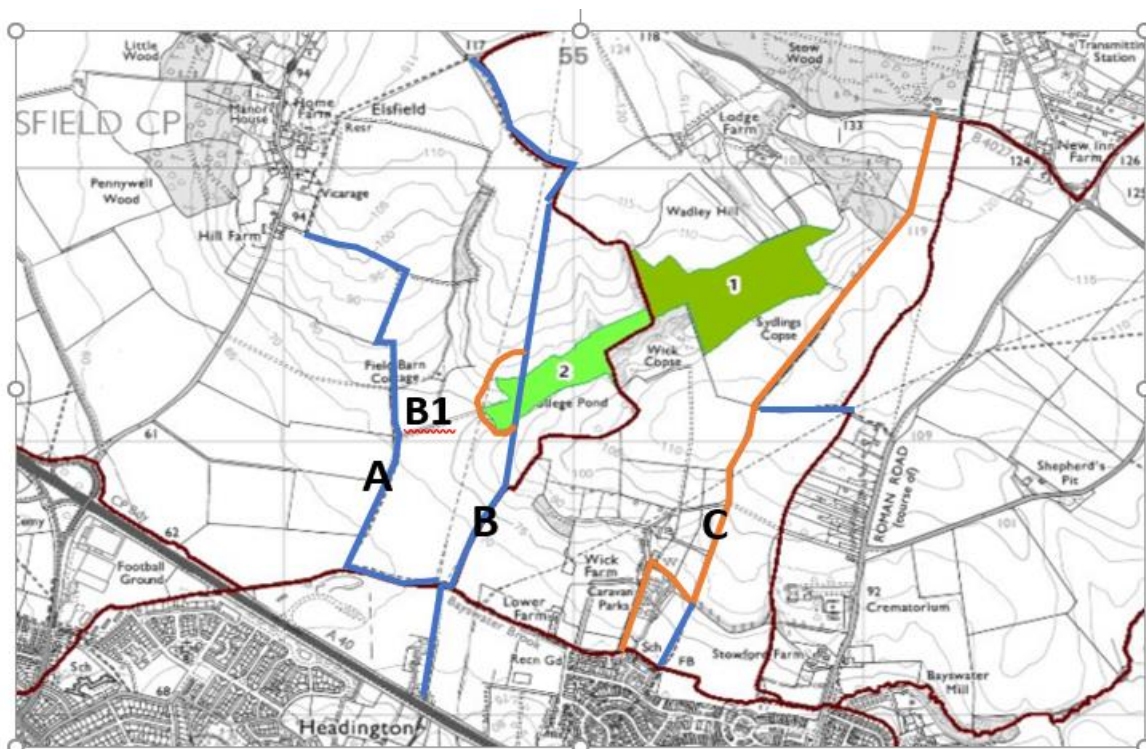


Figure SSSI 2. SUGGESTED FOOTPATH CHANGES TO PROTECT SSSI SYDLINGS COPSE AND COLLEGE POND

⁶⁷ https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204308&CODE=F2123C4F21C1D2D9EFA66E3BFA203288

On the map above footpaths are shown in blue A and B and the bridleway in ochre C. The bridleway runs entirely within Beckley parish, Footpath B is in Beckley parish at its southern end, but as it progresses north through the southern end of SSSI College Pond it is in Elsfield parish.

An original proposal from the developers of LnBB, in their first masterplan, was to divert the footpath around the bottom/ west south west of the SSSI as shown in dark orange B1. The developers also proposed a series of new footpaths for exercise and dog walking.

The site promoter Pegasus have proposed a 200 metre 'offset' zone around the SSSI which was recommended by the AECOM Ecology Report to give some protection from any road. This is shown in "Figure 1: Semi-Natural Parkland and Sydling's Copse & College Pond SSSI Mitigation Plan "on page 181 of their Hearing Statement. It must be ensured that any distancing of roads to the protect the SSSI recommended and agreed by Natural England with BBOWT must apply to the boundaries of the whole SSSI.

The Local Plan states - *2. vii) a development that ensures that there will be no demonstrable negative recreational, hydrological or air quality impacts on the Sidlings Copse and College Pond SSSI;*

As part of the mitigation policy the developers have proposed a 'Country Park' as a buffer zone between the housing estate roads, the Link Road, the housing estate and the SSSI. This is shown in Figure 1: Semi-Natural Parkland and Sydlings Copse & College Pond SSSI Mitigation Plan "on page 181 of their Hearing Statement. This land was Green Belt agricultural land, but has been removed from Green Belt. It should retain its rural landscape look and not be transformed into an urban or suburban park. The images show 'avenue tree planting along edge road' which looks particularly urban and not in keeping with the rural landscape. Tree planting is welcome, but these should be fruit trees such as apples and endogenous local trees reflecting those occurring naturally in the SSSI and surroundings.