

Part B Forms

Gosford and Water Eaton Parish Council : Response to Cherwell Local Plan Partial Review Submission

This document sets out our response to the various policies and sections of the Submission Plan and supporting documents. This follows consultation with our parishioners.

In response to Question 3 we have no specific comment to make at this time as to whether the Plan is legally and procedurally compliant or is compliant with the duty to cooperate.

Our view is that the Plan and supporting documents are not sound in respect of being positively prepared, justified, effective and consistent with national policy.

Our response below sets out for each part of the Plan our reasons and the changes requested.

Oxford's Unmet Needs Paras 1.22 -1.33

Reasons

We note that the Oxford Growth Board as reported in para. 1.28 of the Submission states:

“The Board should note that the working assumption of 15,000 is a working figure to be used by the programme as a benchmark for assessing the spatial options for growth and is not an agreed figure for the true amount of unmet need”

This raises two key points. One is that this is the 4400 figure is a working assumption to be tested. Our view is that it should not therefore be considered as given that Cherwell should provide 4400 new homes. Of this 4400 figure 1410 is allocated in Gosford and Water Eaton Parish and represents 32% of the total. There are currently 676 dwellings within the Parish so these proposals for 1410 dwellings will lead to a 208% increase in number of houses in the Parish. This is a substantial figure which in our view needs to be fully tested in terms of its impact on the Parish and its residents. We set out in other parts of our response why we believe that the figure is inappropriate given the impact on existing communities, the environment and transport infrastructure.

Secondly 4400 is not a figure representing true unmet need. It should be continually reviewed in light of Oxford's ability to accommodate its own needs which will change over time and therefore the 4400 figure (of which 1410 or 32% of the total is within Gosford and Water Eaton Parish) should not be taken as a fixed figure for Cherwell to provide.

The Parish Council believes that housing need should be based on up to date economic forecasting. We note, for example, that Brexit has already seen a down turn in EU research funding and a decline in the level of recruitment by the University. The University has called for voluntary redundancies from centrally employed staff. Employment is not set to grow any further at this time. On this basis, an independent review of the economic forecasting should be undertaken which takes these factors into account, as they could affect future housing needs.

Changes

The Plan should give greater recognition to the need to test the 4400 figure considering its impact on local communities and the environment.

4.1 Vision

Reasons

The Parish Council considers that the draft vision gives insufficient consideration to the impact of the proposals on existing communities and the environment. Whilst it sets out a vision for the new development proposed it does not refer to addressing the impacts of such development on existing residents and communities.

To achieve balanced communities, the needs of the existing villages, and their villagers, need to be taken into account. In our community, local services (schools, transport, parking, medical centres) are already under strain, and cannot just deliver extra capacity for more inhabitants. A primary school already has to be extended, the lack of parking continually increases, and, at peak times, the Kidlington roundabout is very congested with commuter traffic. Travelling into and out of Oxford from our community is already very difficult due to congestion – this is noticeably worse with the new housing that has been developed in other parts of the District (e.g. Bicester) in recent years. An additional 4400 houses in Cherwell (1410 of which are in the Parish) together with further growth at Banbury, Bicester and Upper Heyford will put further pressure on the transport network through our Parish and exacerbate the problem.

Additional land will be required, in some cases, to provide additional transport infrastructure whether this is road improvements, bus lane or cycleways. This will result in further development and urbanisation within the Parish and the destruction of further greenbelt/green spaces.

There are already recognised air pollution problems due to traffic (as evidenced by the Air Quality Management Areas declared for the whole of Oxford and on Bicester Road). These problems will be made worse by the proposed development within and surrounding the Parish.

It is difficult to see how new development on the scale proposed can “enhance and conserve the natural environment” when significant areas of countryside which is Green Belt will be lost to development. The plan as proposed allocates 3 significant sites for housing and removes 2 others from the Green Belt. This represents 12% of the Green Belt within the Parish and will significantly erode the gap between Gosford and Water Eaton, Kidlington and Oxford. In addition, the golf course, a valued historic leisure facility would also be lost.

Without fully addressing the impact on local communities the Plan would not be consistent with sustainable development and the National Planning Policy Framework.

Changes

The draft vision should recognise that meeting Oxford's needs must take account of the impact on the environment and local communities including:

- Safeguarding the countryside from encroachment;
- Loss of access to the open countryside for the urban population;
- Removing an established historic leisure facility. e.g. closing the North Oxford Golf course and building houses upon that land;
- Loss of 12% of the Green Belt within the narrowest gap between Gosford and Water Eaton, Kidlington and Oxford.
- Removing around 110Ha of valuable agricultural land; and
- Adding to the parking problems and travel congestion, rather than providing sustainable travel opportunities for the existing and new villagers.

Paras. 5.1 – 5.15, Tabl4 and Figure 10 – Spatial Strategy

Reasons

The proposals within the Plan are for 4400 dwellings of which 1410 are within the Parish. This represents 32% of the total allocation and would lead to a 208% increase in the number of houses within the Parish. It would lead to the removal of nearly 100Ha of land from the Green Belt, 12% of the total Green Belt in the Parish. This would result in a substantial reduction in the Green Belt at the narrowest point between Gosford and Water Eaton, Kidlington and Oxford.

The impact of this level of development on the environment, community and infrastructure of the Parish will be substantial. We are not convinced that the negative effects on the road network can be adequately mitigated and there is insufficient evidence that infrastructure improvements can be delivered as evidenced by recent development within Oxford City. Rather than provide additional parking for the Westgate Centre shoppers, old and new, are being advised to use the Park and Rides¹. There has been little thought by the City Council on the impact of additional parking on the Park and Rides, the impact when they become full (especially for special events or seasonal events) on parking in local areas and especially no thought on the increase of traffic through the villages to get to the City. This has direct implications for the Parish in terms of the Water Eaton Park and Ride and routes to/from the city centre pass which through Gosford and Water Eaton. Such problems will be further exacerbated by additional housing development within Cherwell.

The proposal will lead to the substantial loss of countryside, increase the pollution to the area, impact on recreational facilities and on the landscape wildlife and historic environment.

Furthermore, as discussed elsewhere in our responses we are not convinced that the figure of 4400 is justified or appropriate for meeting Oxford's Unmet Needs.

With all of this in mind we are not convinced that the spatial strategy as put forward is the most appropriate nor will it be deliverable without major impacts on the existing community and environment.

Changes

We would request that Cherwell reconsider the proposed strategy as the impact on Gosford and Water Eaton, it's community and environment is considered unacceptable.

1

[http://www.oxfordmail.co.uk/news/15472442.Retailers asked encourage Westgate shoppers and staff to ditch cars amid traffic fears/](http://www.oxfordmail.co.uk/news/15472442.Retailers_asked_encourage_Westgate_shoppers_and_staff_to_ditch_cars_amid_traffic_fears/)

Policy PR1 Oxford's needs

Reasons

The Parish Council is concerned that the figure of 4400 homes of which 1410 (32%) are within the Parish area is not appropriately justified given the impact on the Green Belt, the environment and infrastructure. The Parish has 676 dwellings so this development will lead to a 208% increase in the number of houses. We are not convinced that this level of development can be delivered with the necessary transport and other infrastructure and without detrimental impact on both existing residents and those of the new communities.

The policy goes on to state that proposals will be supported if they “comply with other material Development Plan policies” and “achieve sustainable development”.

It is difficult to see how the proposals are consistent with some policies of the existing Development Plan, notably Policy ESD13 of the adopted Local Plan, in terms of the impact on local landscape character. By increasing visual intrusion and harming the local landscape these development proposals would be contrary to these policies. Policy ESD15 seeks to respect an area's unique built, natural and cultural context. Development on the scale proposed which will increase the number of houses within the Parish by 208% will not secure this goal.

Similarly, for the reasons set out above in terms of impact on local communities and the environment the proposals would not achieve sustainable development and would not be consistent with the National Planning Policy Framework.

We set out elsewhere in our response why we believe that the level of housing proposed is unsustainable in terms of its impact on the existing community, environment and transport infrastructure.

Changes

The scale of growth proposed at 4400 dwellings is too high and needs to be reduced to better achieve sustainable development. The Parish Council considers that any further development will lead to detrimental effects on the community and environment. However, if development has to be accepted then growth should be restricted to no more than 25% of the existing number of dwellings within the Parish.

Policy PR2 Housing

Reasons

Overall we object to the level of housing proposed and do not consider that Green Belt sites in the Parish should be released for development.

Notwithstanding this view the Parish Council supports the overall approach to providing high levels of affordable housing. We are of the view that a minimum of 50% affordable housing should be provided on any approved housing allocation to this area. We have a number of concerns regarding the delivery of these proposals.

We know from our residents that there are significant problems for people trying to access affordable housing within Gosford and Water Eaton. Our main concerns are as follows:

1. How will affordable housing be defined so that it is truly affordable for those in need?
2. The same affordability problems exist for residents of Gosford and Water Eaton as for those in Oxford. The Plan should ensure that new affordable housing is equally available to residents in Gosford and Water Eaton.
3. It is important that affordable housing is delivered in accordance with the policy and not watered down as a result of developer pressure. Appropriate mechanisms need to be in place to secure the affordable housing in perpetuity.
4. Providing housing for key workers is welcomed however how this will be made is unclear in the policy and we would welcome explicit and secure inclusion.
5. In the case of market housing there is concern that an appropriate mix is provided and not just executive homes. The mix of housing type is not set out in the policy. In addition, we are concerned that buy to let landlords may purchase market housing making it less affordable.

Changes

There should be greater detail in the Policy and supporting text regarding how affordable housing will be defined and delivered such that it continues to remain affordable both for local residents and those from Oxford. Further details should also be given on the mix of market housing type and how key worker housing will be provided.

Policy PR3 Green Belt

Reasons

95% of the land within Gosford and Water Eaton Parish is within the Green Belt. The plan as proposed allocates 3 significant sites for housing and removes 2 others from the Green Belt. These are Water Eaton Park and Ride and land between the A34 and PR6b which the Plan states in 5.39 is not suitable for residential development. In total, this involves the removal of nearly 100 hectares of land from the Green Belt within the Parish Council's area which represents 12% of Green Belt in the Parish. This loss will occur in the narrow gap between Gosford and Water Eaton Parish and the village of Kidlington with north Oxford reducing the separation substantially leaving very little undeveloped land between the settlements. It will result in the urbanisation of Gosford and Water Eaton Parish with a 208% increase in the number of houses within the Parish.

We note that in the Green Belt Study (April 2017) all the site allocations in the Parish were identified as "High" or "Moderate High" in terms of harm to the Green Belt from their release for development. Indeed, of all the sites considered in the study within Gosford and Water Eaton the majority are also given a "High" or "Moderate High" ranking.

It is clear that releasing this land for development of 1410 dwellings will lead to the coalescence or near coalescence of Kidlington, Gosford and Water Eaton and Oxford. The remaining gap is heavily dominated by transport infrastructure (railways and major roads) and therefore does very little to preserve any real sense of openness which is a key function of Green Belt policy. With such a narrow gap it will be much more difficult to retain any real sense of separate identity for Gosford and Water Eaton and for Kidlington.

Para. 80 of the National Planning Policy Framework states the five purposes of the Green Belt:

"80. Green Belt serves five purposes:

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

The proposals put forward in the Partial Review would in our view fundamentally conflict with several of these objectives. They would lead to:

- further sprawl from a large built up area through the northward expansion of Oxford urban area;
- Gosford and Water Eaton, Kidlington and Oxford merging as a result of the development;
- Encroachment onto the countryside within the Parish; and,
- Damage to the setting of Oxford through development within the Cherwell Valley.

The National Planning Policy Framework (NPPF) is clear in paras. 88 and 89 that new building within the Green Belt is “inappropriate” and should only be allowed in “very special circumstances”. The Parish Council is not convinced that “very special circumstances” exist in relation to the proposed development of Green Belt in the Parish.

We would also refer to the statement in para. 034 of the Planning Practice Guidance (Stage 5 – Housing and Economic Land Availability Assessments):

“In decision taking, can unmet need for housing outweigh Green Belt protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.”

In addition, we would also highlight a clear inconsistency in the way Cherwell District and Oxford City have approached the review of Green Belt sites as part of their Local Plan process. Both authorities have carried out Green Belt Studies using the same consultants (LUC) and the same methodology which assesses the harm associated with releasing sites for development.

In the Oxford City Council – Background Paper _Preferred Options on Housing Needs and Supply June 2017 it states on page 5:

“On balance, the proposed policy approach in the Local Plan is to exclude from the site allocations process any sites or parcels which would have a “high” harm or “moderate high” harm impact”

These sites are therefore not to be taken forward for further consideration. By contrast all the sites allocated by Cherwell in Gosford and Water Eaton are scored “moderate high” or “high”. This is a fundamental inconsistency in the approach adopted and begs the question as to whether Oxford City have really considered all options for development within the City boundary to an equal extent as within Cherwell. In our view this throws further doubt on the appropriateness of the figure of 1410 houses for Gosford and Water Eaton.

In conclusion our view is that development of the three sites in the Parish for 1410 dwellings will fundamentally undermine the key purposes of the Green Belt and should not be permitted to go ahead.

Green Belt

We would wish to see all allocations removed and the land retained as Green Belt.

Policy PR4 Transport

Reasons

The Submission Plan (5.45) explains that north Oxford suffers from “high levels of congestion and delay” and that there are Air Quality Management Areas across the whole city as a whole and on a small section of the Bicester Road due to high levels of pollution.

The Parish Council considers that 4400 new homes (with 1410 in the Parish) will exacerbate these problems further and is not convinced that the transport measures set out are deliverable and will address these problems. Gosford and Water Eaton is criss-crossed by the main major highways (A34, A44 and A4165) bringing commuters and visitors to the City. Additional houses allocated within the Parish, and at Begbroke, Yarnton, Woodstock and Kidlington as well as further afield at Banbury and Bicester will all generate extra traffic which will be channelled through the Parish.

Whilst the Parish welcomes the proposed transport improvements in the Plan we remain unconvinced that sufficient funding exists or can be secured to deliver these improvements. Even with these changes in place the transport pressures in this area will remain. It is critical that these measures are delivered and in many cases, they are required to address problems now, even without a further 4400 houses in Cherwell.

Specific concerns are as follows:

Traffic Levels

Oxford Road is regularly at a standstill from 7.00am on a working day. It can take minimum 45 – 60 minutes to get into Oxford City. Roundabout changes at Cutteslowe and Wolvercote have not made things better. Additional traffic will make the situation worse.

The Bicester Road is similarly busy at peak times, often coping with traffic avoiding the congested A34. We would question what changes can be made on the slip road from A34 onto the Bicester Road in order to improve congestion in the long run. Bicester Road is used as a rat run when the A34 is blocked which happens frequently leading to congestion.

The Submission Plan itself recognises the existing problems and acknowledges in 5.47:

“Traffic modelling suggests that under the highway circumstances that exist in 2013, the 4400 new homes we are planning for would increase car journeys by 1.3-1.4% - a relatively small percentage change but one that must be seen in the context of a wider picture of existing traffic congestion and delay experienced on the network.”

An additional 4400 houses in Cherwell (1410 of which are in the Parish) together with further growth at Banbury, Bicester and Upper Heyford will put further pressure on the transport network through our Parish and exacerbate the problem. The new Westgate Shopping Centre is anticipated to be a major attraction drawing visitors in and traffic problems within Oxford related to this are already being reported locally.

Bus Services

PR2 (a) ii and (d) refer to improved bus services along the A4260/A4165. At present there are examples of bus services being reduced through Gosford rather than increased. The S5 (Stagecoach) bus service no longer runs direct from Gosford, have more diverted routes and are busier and more delayed than previously. Delays are due to increased traffic congestion.

The Parish is also concerned that charges at the Park and Ride are increasing which will not help alleviate the problems.

Where will additional space be found for a bus lane on Oxford or Bicester Road? Residents already experience problems from vibration in their houses from buses/lorries so if the bus lane is brought closer to their properties this will make the problem worse. How will an additional bus lane through Kidlington or Gosford be achieved. There are concerns that previous proposals for pedestrianisation did not happen.

Air Pollution

There are designated Air Quality Management Areas (AQMA) covering the whole of Oxford and on Bicester Road within the Parish. This illustrates that there are recognised air pollution problems within and very close to the Parish. The most recent 2016 Air Quality Status Report for Cherwell confirms (Table 3.1) that nitrogen dioxide concentrations still exceed the national air quality objective for Bicester Road AQMA.

Given that the whole of the administrative area of Oxford City has been declared an AQMA it is difficult to believe that areas just immediately to the north of the City Boundary (and within the Parish) will not risk suffering equally from air pollution resulting from increased traffic levels. Within the Oxford AQMA the Wolvercote and Cutteslowe roundabouts are identified as hotspots for pollution both of which are close to Gosford and Water Eaton Parish. We do not consider that Cherwell has fully considered the air pollution impacts of the additional traffic on the Parish.

Funding

Appendix 4 provides a list of transport infrastructure improvements to support the growth proposed. However, it is noted that whilst many of these are considered of “Critical” costs/funding are to be confirmed. It remains distinctly unclear as to whether these improvements will indeed secure the necessary funding. In addition, many of these schemes, it appears require developer funding for implementation which are clearly yet to be secured.

There needs to be a much clearer link between the transport improvements and new developments. Development should not go ahead until critical infrastructure is in place.

Given the above concerns we do not consider that Policy PR4 will achieve sustainable development, nor will it be effective in delivering the necessary improvements over the Plan period. We remain unconvinced that the policy complies with the National Planning Policy Framework paragraphs 29 and 30 in terms of delivering sustainable transport and reducing congestion.

Changes

There needs to be a much clearer relationship between transport improvements and the delivery of new development. In our view there are too many uncertainties within the current plan regarding delivery and timing of new infrastructure. This needs to be made more explicit in Appendix 4 which should set out costs and funding sources and also how this is linked to delivery of development.

Policy PR6a Land East of Oxford Road

Reasons

As the Plan notes in 5.78 this development will result in the loss of agricultural land (48Ha) and a highly valued local landscape which is used by local residents for recreation. Adding 650 houses will lead to a substantial reduction in the gap between Oxford and Kidlington and urbanisation of Gosford and Water Eaton.

It is noted in the Plan in 5.83 that this area is viewed as a new North Oxford neighbourhood, however the land is within Gosford and Water Eaton Parish and should be recognised as such especially given the scale of development planned. We would like all references to this land to be credited to Gosford and Water Eaton in any future documentation.

In terms of specific comments:

- In total 1410 dwellings are proposed in the Parish. 650 of these are on this site. This number will have a major impact on transport infrastructure in particular on the already heavily congested Oxford Road. The Parish considers that traffic from this development will increase congestion further. It is not clear how the transport improvements including new bus lane (and/or cycle lane provision) can be implemented without further problems for Oxford Road residents who already suffer from congestion, delay, air pollution and vibration caused by passing lorries/buses.
- In the Green Belt Study (April 2017) this site was categorised as “High” in terms of harm to the Green Belt from its release for development. We concur with view and consider that it would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt. This would result in continuous development up to the railway/A34. This in our view will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford. The area has no easily definable boundary to the east which raises further concerns about how development may be contained in the long run.

Whilst we are opposed to the development on this land, if it were to go ahead we would wish to see the following incorporated in the proposals:

- As we have set out in our response to Policy 2, we support the 50% affordable housing provision, however it is important that Cherwell DC, robustly enforces this policy and ensures that affordable housing is equally available to residents of Gosford and Water Eaton Parish in perpetuity.
- Providing a community facilities for residents is welcomed although we have concerns as stated about the traffic implications of this as stated above and the impact on Kidlington Centre which is much used by Gosford and Water Eaton residents. There are major

pressures on existing community and health facilities in the area and therefore it is critical that new facilities are delivered.

- Green spaces- The provision of public open space/wildlife habitats is welcomed however we would seek reassurance that this land will be protected from future development and will remain permanently in the Green Belt.
- Wildlife habitats should be properly investigated and protected.

Changes

We would wish to see this allocation deleted and the land retained as Green Belt.

Policy PR6b Land West of Oxford Road

Reasons

As the Plan notes in 5.81 the North Oxford Golf Course comprises:

“an important buffer feature on the urban edge, limiting perception of the city, and helps to maintain the gap with Kidlington.”

Building 520 houses on this area will significantly reduce the gap between Kidlington and Oxford where it is already at its narrowest.

The Golf Course is an extremely important leisure facility which has existed for 110 years. It is highly valued by the local community and well used. We strongly object to it being developed for houses. The Parish questions the viability and practicality of moving the Course given the considerable expense and disruption which will result.

In terms of specific comments:

- In total 1410 dwellings are proposed in the Parish. 530 of these are on this site. This number will have a major impact on transport infrastructure in particular on the already heavily congested Oxford Road. The Parish considers that traffic from this development will increase congestion further. It is not clear how the transport improvements including new bus lane can be implemented without further problems for Oxford Road residents who already suffer from congestion, delay, air pollution and vibration caused by passing lorries/buses.
- In the Green Belt Study (April 2017) this site was categorised as mostly “High” or “Moderate High” in terms of harm to the Green Belt from its release for development. We concur with view and consider that it would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt and also site PR3c. This would result in continuous development up to the railway/A34. This in our view will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford. The area has no easily definable boundary to the east which raises further concerns about how development may be contained in the long run.
- There is well established tree cover on the site including many TPO trees which could be impacted by this development.

Whilst we are opposed to the development on this land, if it were to go ahead we would wish to see the following incorporated in the proposals:

- As we have set out in our response to Policy 2, we support the 50% affordable housing provision, however it is important that Cherwell DC, robustly enforces this policy and ensures that affordable housing is equally available to residents of Gosford and Water Eaton Parish. Further information needs to be provided as to how this will be secured in perpetuity.
- We note that the density proposed at the site is low at 25 dwellings per hectare, in order to preserve the trees and woodland currently on the site. On this basis we are sceptical about

the viability of delivering 50% affordable housing on the sites and developers are likely to argue for this proportion to be reduced and/or for significant reduction in the vegetation on the site. Both of which would be unacceptable outcomes.

- Requiring contributions for a community facilities for residents is welcome however there are major pressures on existing community and health facilities in the area and therefore it is critical that new facilities are delivered. We are not convinced that adequate facilities will be put in place to address this problem.

Changes

The Parish Council believes that this allocation should be removed from the Plan and the land retained as Green Belt.

Policy PR6c Frieze Farm

Reasons

As stated in our response to Policy PR6b the Parish Council is opposed to development on the North Oxford Golf Course and therefore to a replacement course being provided on this site.

There is very little detail provided on this proposal which is of major concern. Indeed, the size of the site is not stated and there is no evidence provided to confirm that the site is large enough or suitable for a replacement course. It is not clear how the site would be accessed or what constraints exist to influence any future development brief.

Whilst the Parish is opposed to the development of Green Belt, if development does have to go ahead within the Parish then we suggest that further consideration could be given to the suitability of Frieze Farm for housing. The site could link to the North Oxford Gateway and to existing road infrastructure. It could also help support the underused Stratfield Brake recreational facility.

Changes

This allocation should be removed from the Plan together with the proposal for development of the North Oxford Golf Course. Further consideration could be given to the potential to use of the Frieze Farm site for housing.

Policy PR7a SE Kidlington

Reasons

The development of this area will result in the loss of 11 hectares of Green Belt land which forms an important part of the gap between Kidlington and Oxford. Building 230 houses in this location will result in a weakening of this gap. The Parish Council objects to the development of this land. We have specific concerns set out below:

- In total 1410 dwellings are proposed in the Parish. 230 of these are on this site. In our view this will add to the existing traffic problems which exist and further add to congestion and delay. There is no scope for extra traffic on Water Eaton Lane and there should be no vehicle access onto it from any development.
- In the Green Belt Study (April 2017) the majority of this site was categorised as partly “High” and with the remainder as “Moderate” in terms of harm to the Green Belt from its release for development. We consider that development would significantly erode the gap between Kidlington and Oxford, especially in combination with removal of the Park and Ride site from the Green Belt, site PR3c and allocations PR6b and PR6a. This would leave a very small gap comprising the southern part of PR7a between Kidlington and Oxford. This in our view will lead towards the coalescence of Gosford/Water Eaton/Kidlington and Oxford.
- The overflow gravesite from St Mary’s Church is situated very closely to this site with an area built in for expansion. However, any new development in Kidlington and Gosford & Water Eaton is not included in the current growth plan. We agree that additional space needs to be provided in this area. We would suggest additional space should be reserved here, in the form of allotments, to be ready for future need. Therefore, the size of available space on this plot should be reviewed.

Whilst we are opposed to the development on this land, if it were to go ahead we would wish to see the following incorporated in the proposals:

- There are concerns about managing surface water run off in this area to avoid flooding which already occurs in parts of this area. We note that part of the site is within Flood Zone 3 and should not be developed.
- As we have set out in our response to Policy 2, we support the 50% affordable housing provision, however it is important that Cherwell DC, robustly enforces this policy and ensures that affordable housing is equally available to residents of Gosford and Water Eaton Parish.
- The impact of the additional housing on the infrastructure and facilities within Gosford and Water Eaton is a major concern.
- Green spaces- Whilst we note that a large part of this allocation is given over to recreational open space this land should however remain open in perpetuity and not be available for development in the future. The Parish Council requests that additional land is provided for allotments.

- We agree that additional land should be provided for graveyard use. This would enable current projections in use as well as additional, as yet unknown, use for additional housing in the three communities.

Changes

We consider that this allocation should be removed and the land retained as Green Belt.

Policy PR11

Reasons

The Parish Council is very concerned about the implications of this development on existing infrastructure. On the basis of current evidence we do not believe that infrastructure can be delivered to support this scale of development without adverse effects on both existing and new residents.

We are opposed to the proposed allocation of 1410 dwellings within the Parish, in part due to the impact on infrastructure. Notwithstanding this position, if development does go ahead then then we have the following concerns:

Health - Residents already experience major difficulty accessing doctors' surgeries and other health facilities with long waits for appointment times. Although there is mention of provision of health facilities it is unclear how this will be delivered whether this will be adequate for existing and new residents.

Water supply – There is concern as to whether adequate water supply is in place to accommodate the additional demand from a further 1410 homes together with other proposed development in Cherwell. We note that the Oxfordshire Infrastructure Strategy Executive Summary states:

“With regards to demand and supply forecasts for Oxfordshire area: under dry year average conditions identify a deficit from 2024/25 growing to 15 million litres per day (Ml/d) by 2040. Under peak conditions a deficit is forecast from 2019/20 growing to 33 million litres per day by 2040. This growing deficit is driven by the impact of population growth and climate change on groundwater sources and therefore a reduction in available deployable output for the resource zone. “

The additional population resulting from the housing proposed will further increase this problem.

Kidlington Centre- It is not evident how these proposals affect Kidlington centre. There appears to be little capacity to accommodate further premises in the centre. The proposals will cut off Yarnton from Kidlington. Yarnton would have a new centre and residents of new development to the south of Kidlington are therefore less likely to use Kidlington. Gosford and Water Eaton residents use Kidlington Centre to access services and facilities and therefore may be affected if the centre becomes less viable and the range of services is reduced. The District Council should consider how these proposals will impact on Kidlington centre and how it may be supported.

Transport – We have expressed our concerns about transport infrastructure in response to Policy PR4. Given the high levels of congestion within the area we have major reservations about the ability of the road network to cope with this level of development. It is not

evident that funding is secured for necessary improvements and therefore the ability to make the changes needed is uncertain. Air pollution from increased traffic from this and other developments is an additional major concern.

Affordable housing- We would reiterate our comments on Policy PR2. Whilst we support the provision of affordable housing at the levels suggested, there are concerns about how this will be delivered and secured on a continuing basis. We believe that affordable housing should be equally available to local residents as to those from Oxford city.

Policy PR11 as written sets out basic principles which we support however it does little to reassure the Parish that infrastructure will actually be delivered and evidence on development in other areas suggests that this will not happen.

Changes

Further detail and commitments are required to clarify how infrastructure will be funded and delivered.

Policy PR12b

Reasons

This policy is related to sites which are not allocated in the Partial review and sets out that such sites would only be permitted under certain circumstances.

In respect of Gosford and Water Eaton Parish area such a policy does raise concerns. The plan as proposed allocates 3 significant sites for housing and removes 2 others from the Green Belt. These are Water Eaton Park and Ride and land between the A34 and PR6b which the Plan states in 5.39 is not suitable for residential development. The remaining open areas within the Parish are shown as Green Belt and in some cases also as protected public open spaces.

On the face of it would seem unlikely that any application within the Parish (unless within the existing built up area) would be acceptable to the Council under this Policy. This is because remaining open land would be Green Belt (and in effect protected under Policy PR1 and Policy ESD14 of the Local Plan). However presumably the Council consider that such a proposal could come forward hence the need for the policy. In our view land identified as Green Belt following this review should remain Green Belt permanently and under no circumstances would further development on it be permitted.

We note that there is an additional clause requiring consultation and support of the local community. It is unclear how local community support would be considered. It is difficult for us to believe that if the Council was faced with having to consider other sites to ensure that they meet the housing supply that local community objection would be sufficient to prevent development going ahead.

In the interests of providing certainty it would seem more appropriate to have a robust Plan that is deliverable and ensures that remaining areas are fully protected rather than allowing exceptions such as provided for by this policy.

Changes

We consider that this policy should not allow for any additional development or release of Green Belt land within the Parish.

Sustainability Appraisal

Reasons

The Sustainability Appraisal (SA) is based on considering areas against a range of economic, social and environmental objectives. It is a high level study, based on a number of assumptions and subjective judgements, and therefore can only have limited value in assessing the suitability of locations for development. Our comments below relate to the different stages of the process.

Areas of Search Appraisal (1.93 – 1.113)

The points below repeat out concerns expressed at the Option Consultation Stage. Whilst we note that Area A - Kidlington and the surrounding area - appears to perform well against some of the criteria, notably access to services, the assessment also highlights a number of potential negative effects, notably on landscape, biodiversity and heritage. Given the scale of development proposed, the benefits to health and well being (objective 2) (measured by proximity to existing public services e.g. doctor's surgeries, sports facilities and open space etc.) is overstated in our view. These facilities are provided to serve existing communities, and will not be able to cater for new residents as well, without significant expansion/investment. Examples include doctor surgeries and hospital services. Any large scale development would need to provide new services for new residents.

The SA sets out that for Area of Search A, Kidlington, there is potential for both negative and positive effects on air quality and congestion (Objective 10). Negative effects caused by increased traffic, given how close the area is to existing AQMAs, is of considerable concern. This further emphasises the need to deliver public transport, cycling and walking links to minimise this impact. As stated elsewhere, the Parish is very concerned about the potential impacts on congestion arising from such large-scale development.

On objective 5 (creating and sustaining vibrant communities), the potential for negative effects on existing communities is significant, and not just through the construction phase, but also once built through increased noise, light and traffic pollution, for example. At a high level of assessment as that used in the SA, there should be a recognition that significant adverse effects are possible, and that careful consideration needs to be given to help minimise these given planned development will increase the current local housing by over 208%.

Whilst we note there is some recognition of the impact of settlements coalescing under Objective 8 (landscape), we believe that this is understating the impact. In terms of sustainability, the potential that existing settlements will lose their identity and merge

together, is a major consideration for current and future generations. It should be given greater weight.

Site Options within Areas of Search A and B Appraisal

We set out above our concerns in relation to the Sustainability Appraisal as applied to the Areas of Search and many of these concerns are carried through to the appraisal of site options.

Strategic Policies and Preferred Site Allocations Appraisal

Again, many of the concerns outlined above are carried through to the Preferred Site Allocations Appraisal.

It is noted that Policy PR1, a key policy for the Plan shows mixed positive/negative effects on Pollution and Congestion. We are not convinced that there are positive effects on this objective given that increased road traffic will be generated in areas already suffering from pollution. This comment also applies to the housing site allocation which perform the same against this objective.

In terms of the site allocations we also note that the housing sites within the Parish are shown to have potential negative effects on biodiversity, landscape, historic environment, efficient use of land and resource consumption. This reiterates our concerns expressed in other parts of our responses that there are significant environmental consequences arising from these allocations.

Page 54 of the SA looks at cumulative effects and again highlights negative effects as highlighted above when you look at the effects of all development proposed.

Changes

As discussed above parts of the Sustainability Appraisal should be reviewed and revised.

Transport Assessment

Reasons

The Transport Assessment is a large complex document that is difficult for residents to understand. It would have greatly benefited from a Non-Technical Summary which explained the work carried out and the conclusions.

The Transport Assessment notes in 2.42 -2.45 the existing congestion problems which exist in north Oxford and the road network leading to it in terms of delays and journey time unreliability along Oxford's Outer Ring Road and the A34. Paras. 2.46 – 2.48 sets out the poor air quality which exists and the AQMAs designated in Oxford and at Bicester Road within the Parish. In para. 2.54 congestion on public transport is highlighted with crowded services and buses contributing to congestion.

The above information which is supported by the Parish Council's own experiences and those of its residents show that there are major problems with the transport infrastructure. An additional 4400 houses (of which 1410 are within the Parish) will in our view make this situation worse. We are not convinced that there is evidence of properly costed and funded infrastructure improvements to deal with these problems and certainly no evidence that this will be addressed in advance of development or within a reasonable timeframe to support proposed development.

The key findings from the evidence base on p.139-140 confirm many of our concerns about the impact of development namely:

- New residents will want to commute into Oxford for jobs. In our view, whilst this is inevitable it will undoubtedly lead to increased problems on already congested roads.
- Cherwell's boundary is at least 5.9km from most of the city's major employment areas and this is higher than the average national cycle trip length (4.8km). Encouraging increased cycle traffic will in our view be a major challenge even with new cycleways (current cycleways share the road with the bus lanes which creates different issues). Reliance on the car for commuters is still very likely.
- Affordable public transport investment is required². Whilst proposed housing may help fund this we have concerns about if and when this will be delivered and how it will be implemented without adverse effects on existing residents.

The TA has modelled a series of transport measures applied to the preferred development scenario. On page 144 the conclusion notes that:

2

http://www.oxfordmail.co.uk/news/14525803.Stagecoach_announces_12_more_bus_routes_to_go_by_July_20/

“transport infrastructure investment is relatively fluid; evolving over time to reflect delivery, funding and local growth opportunities”

As we have said elsewhere in our response we remain extremely concerned as to whether adequate funds will be secured to deliver the critical infrastructure required to cope with this development. If key elements of this are left out then this could have major impacts in terms of worsening delays, congestion and air pollution.

Changes

We remain concerned about some of the impacts on congestion and air pollution highlighted in the TA. These are compounded by uncertainties around infrastructure delivery (timing and funding) and so we would request that the TA is reviewed with these issues in mind.