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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Nadia Robinson
Planning & Regulatory Services
Oxford City Council

BY EMAIL: nrobinson@oxford.gov.uk

3 October 2018

Dear Nadia Robinson,

**CPRE Oxfordshire Response to Application Ref. No: 18/02065/Outful
Oxford North (Northern Gateway) Land adjacent to A44.A40, A34 and Wolvercote
Roundabout Northern By-Pass Wolvercote**

CPRE Oxfordshire campaigns to protect the countryside by ensuring the effective use of land in both rural and urban areas. We have a particular interest in this site because of its proximity to the surrounding countryside and the sensitivity of the local environment, including the Oxford Meadows Special Area of Conservation (SAC).

We are concerned that the transport impacts of this application have been significantly downplayed, leading to underestimates in both likely congestion and air pollution, and the subsequent impacts for public and environmental health. We also have a concern about the impact of the proposed Red Hall design and its potential impact on Port Meadow and the SAC.

We therefore believe that both outline and detailed planning permission should be refused.

Site

In the voluminous papers lodged in support of this application there is little or no reference to the chief commercial advantage of this proposed development which is its close proximity to the adjoining major arterial roads (A34, A40 and A44). The A34 which runs along one side of the site is the only North South expressway route in Southern England and connects to the M40 and M4 as well. The A40 along another side of the site provides the only major route to Cheltenham, Gloucester and the Cotswolds from London.

Many potential occupiers would regard this easy access to and from the national road network as being a very important factor in moving to a development on this site. The flow of road traffic as a result will be substantially increased on the roads around the development. In addition to those working on site, there will be many who visit offices for meetings and short-term assignments as well as the usual deliveries. These visitors will very often be travelling from some distance and will prefer to use their own transport for reasons of speed and comfort.

Despite the obvious attraction of being located so close to the such major road links the papers lodged in support of the application make no mention of this and seem to suggest that most people travelling to the proposed development will be based in or close to Oxford. Bearing in mind the shortage of housing in Oxford, particularly within easy walking or cycling of the site, and the isolated nature of the development this assumption appears to be unrealistic in the extreme and contradictory. In downplaying the true increase in local traffic in this way, the likely impact on Oxford and its surrounding countryside is obscured.

Unfortunately, by taking a totally unrealistic approach to the additional traffic which will be generated by the proposed development, the impact on the local environment, particularly in terms of air pollution has also been considerably underestimated as will be set out later.

Another feature of the site is the close proximity to two railway lines which in the case of the line through Wolvercote already carries a large amount of freight and the Chiltern line which is the process of being upgraded to take freight. Neither line is electrified and the locomotives run on diesel. Many of the locomotives are old and produce copious emission of NOX (Nitrous Oxide) gases as well as particulates.

Present situation on Oxford Roads

There can be no dispute that traffic congestion is a major problem for Oxford. The City has no suburban tram or train links and all traffic has to by road. There are bus lanes which alleviate some of the hold ups, but in places there is no room for bus lanes. Buses thus get held up in the traffic jams along with all the other traffic. The utilization of bus services for those living outside Oxford to travel there is very poor. One of the main reasons for this is that almost all such buses go to Oxford City centre and not to the major areas of employment which are located some miles away from the centre.

The centre of Oxford has poor facilities for those travelling by bus and there are no direct buses which connect the proposed development site with the other major research/ business areas in Oxford such as the Hospital sites, Oxford Business Park and Science Park.

Cycling from the proposed development site to the centre of Oxford is unpleasant as there is no cycling lane devoted solely to cyclists. The current mixture of bus and cycle lane is unsatisfactory as there is little room for buses to overtake cyclists. On the Banbury Road cyclists are allowed to use the pavement on certain sections due to the narrowness of the road but this arrangement is far from ideal and presents dangers to other road users.

If any proper traffic modelling had been carried out, it would have shown that the site is really quite isolated and that the idea that many people would cycle there in any numbers is farfetched. The reason for this is simply that the major areas of population in Oxford being primarily East Oxford and Cowley are too far away to make commuting by bicycle feasible.

Potential impact of development

It is proposed that 3,000 secure cycling places will eventually be created on site to encourage people not to use cars to travel to work. In their Transport Assessment Report conclusion Peter Brett state that their aim is that 13.7% of the employment trips will be by bicycle. If the provision of car parking spaces were to be replicated for cars/ motorcycles (49.6%) this would equate to a figure of at least 8,000 car parking spaces plus motorcycle spaces. This provides an insight as to the likely increase in the numbers of vehicles in an area which is already suffering from gridlock at rush hour.

Effect of development

The conclusion resulting from the above is that car travel to the site will considerably exceed the amounts estimated by Paul Brett in their Assessment Report but even based on their highly optimistic Travel plans it is a fact that the majority of those working at the employment sites on the proposed development will journey there by car. The impact of these additional cars on an already heavily congested road system will have the following impact:

1. Increase the journey time for those working elsewhere in the City.
2. Reduce the attractiveness of Oxford centre as a place to visit/ do business in, due to the traffic problems of getting there.
3. Increase the levels of airborne pollution.

CPRE's Position

Although Oxfordshire CPRE has to accept that the site will go to some form of development it has always argued that building new offices and other employment sites is unnecessary when there are so many empty sites on other half completed office and science parks around Oxford available, some of which have been available for many years. To put this in context Oxford Business Park still has 13.1 acres available for development and the Science park has eight vacant sites unfilled. If this development goes ahead as proposed those sites will be even more difficult to fill.

CPRE's principal concerns are that:

1. The increase in cars caused by this development will adversely affect those working there, those living close by and all those who travel to Oxford from the North side of the City and
2. It will also impact on the fragile environment of Port Meadow and the Oxford Meadows SAC.

Air quality

The estimates provided by the Applicant as to future emissions of NOX gases deriving from this development are based on a number of hypotheses of an exceedingly technical nature, but which quite obviously give rise to absurd results. The following example shows this to be the case.

R2 is a monitoring station at 396 Woodstock Road which is about 20 metres from the Wolvercote Roundabout in the direction of the Pear Tree Roundabout. According to Annex 12 - air quality appendices, the predicted increase in Annual Average Daily Traffic (AADT) along the stretch of road (Link 7) where R2 is located is as set out below:

A12.5 Traffic Data

Link	Location	2016 Baseline		2021 Without Development		2021 With Development	
		AADT	HDV (%)	AADT	HDV (%)	AADT	HDV (%)
1	West A40 - Northern Bypass Road	22549	5.76%	21797	6.17%	22267	5.80%
3	A40 - West of Wolvercote Roundabout	22577	5.76%	21658	6.15%	19081	6.69%
5	Central Woodstock Road - Near Wolvercote Roundabout	34663	5.12%	35221	5.31%	33691	5.87%
7	Central Woodstock Road - South of Park & Ride Site	34708	5.13%	35364	5.32%	42691	4.64%
9	Central Woodstock Road - North of Park & Ride Site	36202	4.58%	36787	4.81%	43893	4.24%

The corresponding predicted changes in air quality at R2 extracted from Appendix 12 are as follows:

A12.7 Human Health Receptors Modelling results

Table 12.7.1: Predicted Baseline Concentrations for Human Health Receptors

Receptor	Annual Mean ($\mu\text{g}/\text{m}^3$)					
	2016 Baseline			2021 Without development		
	NO ₂	PM ₁₀	PM _{2.5}	NO ₂	PM ₁₀	PM _{2.5}
R1	32.9	18.7	12.1	24.7	17.9	11.4
R2	52.3	21.5	13.9	38.6	20.5	12.9
R3	38.7	19.3	12.5	28.5	18.5	11.7

Table 12.7.2: Predicted Future Concentrations Without and With Development in Place

Receptor	Annual Mean ($\mu\text{g}/\text{m}^3$)					
	2021 Without development			2021 With development		
	NO ₂	PM ₁₀	PM _{2.5}	NO ₂	PM ₁₀	PM _{2.5}
R1	24.7	17.9	11.4	26.0	18.1	11.5
R2	38.6	20.5	12.9	38.8	20.4	12.8
R3	28.5	18.5	11.7	28.7	18.4	11.7
R4	36.2	19.9	12.5	36.4	19.9	12.5

To show how absurd these predicted figures are:

- the difference between the AADT 2021 “without development” and “with development” figures results in an increase of 7,327 daily traffic movement on Link 7 but this produces an increase in NO₂ at R2 of only 0.2 $\mu\text{g}/\text{m}^3$. Based on the large increase in traffic volume producing such a small increase in NO₂, it would appear that the complete absence of any vehicles at all would proportionally only reduce the $\mu\text{g}/\text{m}^3$ level by 1.165 $\mu\text{g}/\text{m}^3$ [42,691/ 7327 × 0.2].

- The latest published figure for the years 2011 to 2017 (See Fig 1. Below) by the Office of National Statistics show that on Urban roads the quantity of NO₂ measured at DEFRA sites in µg/m³ has only fallen by 18% over the past 7 years with almost no change in the past 3 years.

1108	2011 All sites	27				
1109	2012 All sites	27				
1110	2013 All sites	25				
1111	2014 All sites	25				
1112	2015 All sites	23				
1113	2016 All sites	23				
1114	2017 All sites	22				

Figure 1

In his report dated 15 June 2015¹ the Inspector stated in Para 117, that based on the Air Quality Assessment (AQA) provided by the Applicants the oxides of Nitrogen and acid deposition rates would be significantly lower in 2026 with the development at the site relative to the 2013 base line.

However, that AQA was based on the available fundamentally flawed information from the motor manufacturers in 2014 and it has since been established that the new technology which was intended to reduce deposition rates does not provide anything like the reduction in the emission levels which the Applicant contended at the Inquiry as set out in their AQA.

As set out above, the information on air quality provided by the Applicant in relation to the current application appears to be just as out of line with reality as the previous AQA.

Since the Inquiry it has become clearer that the impact on health caused by these emissions is far worse than had been previously thought and is now considered to be a major source of premature death for those living close to major roads. It is imperative that there be a reliable independent estimate as to the likely traffic flows through the proposed development and in turn some accurate forecasting of traffic emissions to see whether this development should go ahead as proposed. These forecasts also need to build in the likely increase in emissions deriving from other sources such as the improved freight traffic rail route to Bicester.

Proposal in relation to Red Hall

We are concerned that the design of this tall, bulky building is inappropriate and unsympathetic to what is a semi-rural location overlooking Port Meadow and Oxford Meadows Special Area of Conservation (SAC). The building is 24 metres/78 feet tall with a pitched roof that is 7 metres/22 feet high. The area it is located in is 70 metres above sea level and Port Meadow is at 60 metres (see Parameter Plan submitted with application). Thus from Port Meadow the base of the building will already be 10 metres above the height

¹ https://www.oxford.gov.uk/downloads/file/1440/northern_gateway_aap_inspectors_report

of the Meadow. The combined impact of both its elevated site and its own height will make this a very prominent building indeed and change the character of the Wolvercote end of the Meadow to a much more urban one.

It is important in CPRE's view that the developers are required to reduce the height of this building so that the views from Port Meadow and its character are not compromised further. These issues are too often neglected as was shown by the lamentable effect of the new development at Roger Dudman Way, next to Port Meadow. This could perhaps be accomplished by substantially reducing the height of the roof.

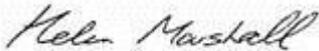
CONCLUSION

The transport impacts of this application are not adequately reflected and are in fact likely to be significant, leading to congestion and air pollution with subsequent impacts for public and environmental health.

The proposed Red Hall design risks significant visual impact on Port Meadow and the SAC.

CPRE Oxfordshire therefore believes that the application for both outline and detailed planning permission should be refused.

Yours sincerely



Helen Marshall
Director, CPRE Oxfordshire