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Northern Gateway Area Action Plan - Options Consultation CPRE Oxfordshire response, March 2014

Established in 1931, the Oxfordshire Branch of the Campaign to Protect Rural England is an independent charity which exists to promote the beauty, tranquillity and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country. We therefore have an interest in the Northern Gateway proposals as they affect the site itself and nearby communities and green spaces, and the broader transport implications.

SUMMARY

CPRE Oxfordshire requests an extension to, or re-run of, the Options Consultation after relevant information has been provided.

CPRE believes that we are NOT in a position to make proper representation on what the best options would be, nor can we see whether or not the options as proposed by Oxford City Council are deliverable, until the following information is provided:

- Up to date baseline traffic figures taken during term-time and including predicted figures for increased traffic as a likely result of the Westgate development and Water Eaton Parkway Station.
- A thorough analysis of commuter patterns through and around the proposed development site, based on the 2011 Census.
- Oxfordshire County Council's outline plans for the county's overall future transport network (work to be launched at Connecting Oxfordshire event, 3 April).
- Current figures for air quality with predicted increases, due to the above info and Network Rail's freight project, and likely increases as a result of the proposed development.
- A full Habitat Regulations Assessment.
- A thorough costing of the proposed infrastructure and confirmation of available funding.

General comments

1. We believe this consultation is premature as vital transport information is not yet available.

Transport issues are crucial in bringing forward development on this site.

However, only a draft transport report is currently available for consideration. This is a baseline report, prepared by an agency on behalf of the landowners, which looks at the existing situation, rather than addressing the specific impacts of any development proposals.

There is also no analysis of commuter patterns and to what extent the proposed A40-A44 link road might relieve the impacts of development. CPRE understands the City Council is still working on 2011 census data to provide this information.

In addition, the data relating to Peartree Park & Ride is from 2007, and there is no assessment at all of the use of Water Eaton Park & Ride, or what the impact will be of the new Water Eaton Parkway station and the new Westgate development.

Until a thorough assessment of all these issues is available, CPRE believes it is premature to be consulting on Options.

2. Any of the proposed options for development will still lead to a worsening of traffic related issues, especially congestion and air quality. There is as yet no convincing evidence that this harm can be avoided or mitigated.

Based on the limited transport information currently available, we believe that all the options for development would still create a significant negative impact on traffic.

Air quality is crucial. Unless air quality problems can be solved, for local people and green spaces, then development should not proceed.

Nitrogen dioxide pollution is already a problem for Oxford City, where levels consistently breach targets, and Wolvercote roundabout is identified as one of the areas of most concern.

No evidence has yet been made available to suggest how the likely decrease in air quality caused by additional traffic and congestion will be avoided or mitigated.

The Health Research Authority states that air quality testing is being carried out and shows the locations but the results have not been documented or made available for this consultation.

Any air quality assessment needs to take account of the Chiltern Railways scheme and Network Rail's plan for a freight route. It also needs to consider the fact that land that has been concreted over is likely to soak up much less air pollution than previously, so pollution is likely to increase even if the development resulted in no additional traffic.

The bottom line is that any development should not worsen air quality for existing residents, visitors or workers in the vicinity, or nearby green spaces.

3. Infrastructure costs are not made clear and are likely to be prohibitive.

The required infrastructure outlined under access & highway measures will be significant. These proposals need to be fully costed and adequate funding identified before any development is agreed.

4. If the development goes ahead, more of the site should be allocated for housing

CPRE believes that development can only go ahead if air quality and traffic issues are resolved, as well as consideration of the impacts of increasing recreational pressure on Port Meadow. We cannot currently see how this can be achieved. However, if solutions are found, more of the site should be allocated to housing. There are high levels of local employment so providing further jobs is less of a priority than providing housing to reduce commuting and improve the jobs/houses balance. It is impossible to comment in detail without adequate information.

5. The Oxford Green Belt should remain unaltered as there are no exceptional circumstances to justify development.

The Inspectors' Report into the Oxford Core Strategy (Dec 2010) says: 'It will be for the AAP master-planning exercise to examine in detail the merits and justification of including the Green Belt land and, through the identification of specific proposals, provide the exceptional circumstances to justify the inclusion of any Green Belt areas within the development site.' (Para 4.147)

No evidence to suggest exceptional circumstances has been provided to justify development on the two areas of Green Belt within the proposed development or the A40-A44 link road which would cut across Green Belt land.

The Oxford Green Belt protects the historic setting of Oxford and prevents urban sprawl. It performs a valuable economic function, being a crucial reason as to why people are attracted to live and work in the area. The main point about the Green Belt is its permanence.

The proposed link road would be likely to increase traffic significantly on the former A43 through Kidlington/ Sainsbury's roundabout and Gosford. No evidence has yet been put forward as to how it would make any concerted difference to the volume of traffic passing through the development site. There are no exceptional circumstances to justify this intrusion into the Green Belt. It also carries the additional risk of opening up the land between the link road and the A34 for further development, and threatens Local Wildlife sites to the West of the proposed road.

6. Omissions from the Options

CPRE also believes there are a number of critical topics missing from consideration within the options:

- a) Importance of the Green Belt in protecting the historic setting of Oxford and how the Northern Gateway forms a setting to the Wolvercote Conservation Area, the historic Goose Green and the Thames Flood Plain.
- b) Light pollution
- c) Schools

- d) Biodiversity - including bats and protection of trees & ancient hedgerows - the issue is mentioned but no options presented.
- e) Collaboration with neighbouring Districts.

RESPONSE TO OPTIONS

Our specific responses to these options are all made in light of our position stated above that this consultation is premature.

p.9 Primary mix of uses: Without adequate information, CPRE does not feel able to support any of these options. We remain to be convinced that the site is suitable for development. However, a small allocation of B1 floorspace, a maximum of 200 houses and minimal retail space would be the least damaging of options at this stage.

p.10 Scale of employment uses - we believe that even Alternative Option 2, providing 55,000m² of employment development, would be unsustainable on this site unless evidence can be provided to the contrary.

p.10 Scale of residential use - of the options presented, Alternative Option 1 (200 homes) is preferable at this point.

p.10 Secondary uses -

Retail - of the options presented, the preferred option is the most acceptable at this stage.
Hotel/Emergency Services - CPRE does not have a view on these options, other than to repeat our general concern over the sustainability of development on the site.

p.12 Affordable housing - CPRE supports the preferred approach of requiring at least 50% of homes to be affordable.

p.12 Dwelling sizes - CPRE supports the preferred option.

p.13 Travel planning -

The road network around the site is already overloaded with extensive peak hour queuing into and out of the city in peak periods.

- a) On A 40 morning with peak queues extending for 6 miles to the end of Witney bypass
- b) Similar queues on A44 extend back well into Yarnton
- c) The 2 /3 lane Sunderland Avenue section of the Oxford ring road is unable to function effectively.
- d) The Woodstock Road is unable to accommodate either bus or car traffic in both peaks without significant delay. (There is inadequate road space for bus lanes in both directions). Journey speeds to and from the city centre from the A40 are unreliable and vary between 4mph and 20mph.)
- e) The key A40 junctions at Wolvercote and Banbury Road are overloaded.
- f) Provision for cycling is both unsafe and inadequate both at junction and on radial routes into Oxford.

Any development will introduce additional traffic onto this already overloaded network.

Sufficient extra road and junction capacity cannot be provided to accommodate the extra traffic

Available capacity can only be redistributed through minor improvements and traffic management to share increased delays and journey times between different users and directions of travel. All traffic is therefore likely to suffer longer journey times as a result of this development.

As stated above, it is difficult to comment properly on these issues when the appropriate data is not yet available.

Issues with Baseline figures

CPRE has a number of concerns about the traffic baseline figures. The figures at 4.7.2 do not state which date in October 2007 the figures were taken from. Can the Council confirm this was not during half-term? At para 4.7.4 we believe that there was snow on 4th February 2008 according to the Met Office's website which would have reduced traffic. At para 4.7.16 & para 4.7.24 and para 4.7.25 the 31st October 2007 was half term so the baseline report will not have included figures for the number of trips to the local, private, public schools, staff and students which is very significant considering that there are probably well in excess of 50 schools and other colleges.

p. 13 Removal of the safeguarding of the route for a guided bus / local rail service. -

Within the context of the lack of information as outlined in our general comments, CPRE is strongly opposed to the removal of this safeguarding, which would be a short-sighted measure severely reducing future options for sustainable local public transport. We are also concerned that this has not been highlighted as an option for comment and therefore people may not be sufficiently aware of this proposal.

Public transport - preferred option - CPRE believes a full transport solution is essential before development on the site can proceed ie the development should be subject to funding for the transport solution, not the transport solution provided subject to funding.

Pedestrian & Cycle links - Although hard to comment in the absence of full transport information, CPRE believes a high quality cycle/footpath link to the new Oxford Parkway station would be important and would therefore support the preferred option, subject to further detailed plans.

Cycle links should not be at the expense of further delay to public transport and general traffic at the junctions.

Routes to nearby residential areas should include safe cycle/footpath routes out to Kidlington and into the City, and connect with the North Oxford cycle track to schools in the Summertown area.

Access & Highway measures - See general comments on infrastructure costs, p.2.

It is not possible to comment without the provision of better information. However, CPRE does not support the off-site strategic link road between the A40 and A44. This would be likely to increase traffic significantly on the former A43 through Kidlington/ Sainsbury's roundabout and Gosford. No evidence has yet been put forward as to how it would make any concerted difference to the volume of traffic passing through the development site (See general comments on traffic, p.2). There is no evidence provided of the exceptional circumstances to justify this intrusion into the Green Belt. It also carries the additional risk of opening up the land between the link road and the A34 for further development.

Park & Ride Capacity & Location - Insufficient evidence has been provided to allow us to comment appropriately on these options. However, CPRE would be concerned about the visual impact of a multi-story site.

Urban Design - CPRE welcomes the preferred approach to produce a design code for the development.

Scale & Massing - CPRE's view is that where development takes place, it should be at the maximum density possible whilst still allowing for adequate provision of green space. We would therefore be generally supportive of taller buildings providing that a full landscape and visual impact study was completed and any harm generated could be fully mitigated.

Landscape & Open Space - It is not possible to comment at this stage, other than to note the preferred approach refers to space around employment buildings and Options 1 and 2 refer to space around residential areas.

Gateway - No comment, other than 'architectural excellence' should be sought whether or not landmark buildings are proposed.

Green Belt

p.20 - Part of the importance of the Green Belt is not 'the impression of permanence' as stated, but its actual permanence.

p.21 Preferred Approach - we do not believe that a review of the inner Green Belt boundary is required as no exceptional circumstances have been put forward and it should be possible to take forward any agreed development on the site without interference with the Green Belt.

We would therefore support Option 3 for Green Belt South of A40 and Option 1 for Green Belt at Pear Tree Farm.

p.22 - Drainage and p.23 - Energy & resources

CPRE supports the preferred approaches as outlined.

We note that given recent events, flooding is very much on people's minds. However, water conservation issues should also be considered within design requirements.

p.24/5 - Air Quality

Please refer to our general comments on page 2.

The bottom line is that any development should not worsen air quality for existing residents, visitors or workers in the vicinity, or nearby green spaces.

Preferred approach 1 - whilst this may be adequate for future residents (which we take to include current residents too), it does not appear to offer sufficient protection for people who may work on the employment site. We therefore suggest the wording is altered to:

'Only permit development where it can be shown that current and future residents, visitors and workers will benefit from a good quality environment, both in terms of noise and air quality.'

Preferred approach 2: Change the words 'is not likely to have an adverse impact' to 'will not have an adverse impact'.