

Northern Gateway AAP Comment Form

NG5 - Highway Access

The AAP submission is Unsound in relying on traffic modelling based on a strategic link road which is beyond the scope of the AAP.

At paragraph 33 of Part Two of his report into the Oxford Core Strategy, the Inspector said:

"We therefore consider it is vital that any policy for the Northern Gateway recognises that the development is dependent upon securing of measures designed to mitigate the impact on the local and strategic road networks."

The Submission AAP says that the proposal for a strategic link road to the west of the A34 is *"beyond the scope of the AAP"* as the impacts of such a road have not been assessed and its alignment is shown on land in Cherwell District. Nevertheless, a lot of the documentation supporting the Submission AAP refers to the strategic link road. In particular, paragraph 36 of Northern Gateway Background Paper 1: Conformity with the Core Strategy says:

"Traffic modelling completed to date concludes that transport solutions can be developed to mitigate the impact of Northern Gateway."

Paragraph 37 of the same Background Paper says that the strategic link road has been taken into account in the traffic modelling. Therefore, the traffic modelling which shows that the traffic impacts of the maximum scale of development at Northern Gateway can be mitigated includes the strategic link road. This means that a strategic transport measure beyond the scope of the AAP has been relied upon to help mitigate the transport impacts and so "enable" the maximum development potential of Northern Gateway.

This is confirmed by the Submission AAP itself. Figure 6 on page 27, Indicative Phasing Plan, includes the strategic link road as part of phase 4 of 6 phases of the development of Northern Gateway. In addition, page 99 of the Sustainability Appraisal for the Northern Gateway AAP Options Document, February 2014, says:

"The Preferred Strategy proposes overall a greater amount of development than envisaged in the Core Strategy, in terms of both employment and housing development. However a higher order of transport mitigation is also proposed."

According to the traffic modelling this *"higher order"* of transport mitigation measures includes the strategic link road.

However, relying on this strategic transport measure in this way to help mitigate the *"very severe increases in congestion"* (paragraph 4.138 of the Inspector's report into the Oxford Core Strategy) arising from the scale of development now proposed is not effective. Provision of the strategic link road is beyond the scope of the AAP and there is no evidence that it can actually be delivered.

There is also a contradiction in listing the off-site strategic link road as a preferred option (p.16 Options Document), which was supported by 87% of respondents, and then identifying that this road is *'beyond the scope of the AAP'* (para 6.8 Submission Document). At the very least, this is a significant undermining of the consultation process, but also raises questions about the soundness of the AAP.

As part of the Core Strategy, a Statement of Common Ground between Oxford City Council and the Highways Agency was provided in relation to the Northern Gateway

development(June 2009). This proposed a comprehensive 'Vissim' microsimulation transport model to assess the likely impact of development options on the existing highway network, and provide the means of testing the effectiveness of potential transport mitigation measures. There appears to be no evidence that this SOCG has been followed.

What change(s) do you consider necessary to make the document sound or legally compliant?

Either traffic modelling should be re-assessed based on mitigating impacts without the proposed strategic link road, or the AAP needs to include full proposals for how the strategic link road can be effectively delivered, including adequate environmental impact assessments of the road itself and evidence of co-operation with neighbouring councils.

NG7 - Design & Amenity & Sustainability Assessment

The submission document is unsound as the potential visual impacts on Port Meadow Special Area of Conservation and the impact on the character of the Wolvercote with Godstow Conservation Area have not been adequately assessed or justified.

A professional 3D analysis of the visual impact on Port Meadow should be required.

The AAP should specify the maximum height of the buildings, allowing for ground levels of the site relative to Port Meadow, taking into account the eye level of those on Port Meadow and the towpath opposite, and addressing the need for mitigation measures as appropriate.

The Sustainability Appraisal accepts that *"the area is in a visually sensitive location, at the gateway to Oxford from the north. It also forms a setting to Wolvercote Conservation Area and historic Goose Green, and for these reasons its sensitivity may be described as moderate."* However the SA does not appear to have addressed issues identified in the Scoping Report especially in not having carried out adequate baseline studies needed to assess the issues identified. In particular, there appears to be no baseline visual analysis - the SA refers to a study but as far as we can see this has not been provided in the background reports.

The landscape of the site is regarded as low grade - but there is NO consideration of the quality of the surrounding landscape on which it would impinge, which is very high grade. There is no mapping of a zone of visibility for potential development blocks of different heights. There are no views from key points with an outline of different heights. There is no consideration of the cumulative effect of multiple issues of visual sensitivity as indicated below.

There is no reference to the highly relevant section of the Wolvercote with Godstow Conservation Area Appraisal about the intrusion of prominent white buildings as seen from Port Meadow.

There is no consideration of the urbanising effects on views from the National Trail across Port Meadow or Pixey Mead - key historic landscape features.

There is no consideration of the setting of multiple listed buildings identified in the Scoping report.

There is no consideration of the impact on views out from key heritage viewpoints within Oxford in relation to the Green Belt's function to protect the setting of Oxford in terms of more high buildings breaking the skyline. Multiple Grade I and II* Listed Buildings, Scheduled Ancient Monuments and Conservation Areas may be affected.

There is no consideration of the cumulative effect of this intrusion on the skyline around Oxford when added to others to the north-east, east, south and west (Engineering and Biochemistry JR, Blackbird Leys, Cowley Centre, and possibly the new Botley Centre if allowed).

There is no consideration of the potential impact on the character and appearance of Cherwell's Canal Conservation area or Vale's Wytham Conservation Area or West Oxfordshire's Yarnton and Cassington Conservation Areas in terms of their rural surroundings, some of which include key areas of historic landscape value.

There is no consideration of possible impact on the distant (7.5km) view south from Blenheim World Heritage Site or consideration of the potential impact on the setting of Port Meadow SAC or Godstow Abbey.

There is no consideration of the impact on distant views of the city from the A34 flyover (the only part of the A34 where long views are obtained): the initial impression of Oxford would be drastically altered, impinging on or blocking the current appreciation people get of the green surroundings to the City.

There is no consideration of the potential for nationally important palaeolithic archaeology (site immediately adjacent to Wolvercote Channel).

There is no consideration of relevant planning policies of adjacent districts - not only Cherwell but also the Vale of White Horse.

The proposed Design Code should not be treated as a cure-all excuse for not doing the appropriate assessment of the relative impacts of the strategic High and Low rise and Gateway or Not Gateway options. This would risk passing the buck down the line to stages of the planning process when impacts could no longer be adequately addressed. Instead, a proper viewshed analysis for different heights of buildings should have been used to establish the capacity of the site to absorb development to AVOID significant effects of key visual, landscape and heritage issues.

Access to Green Space

The City Council's objective on access to green space is relevant and should be applied to new developments.

'Objective 04: Improving local access to Green Space

Our aspiration is that people do not have to walk more than 1900m to their nearest Large Park, not more than 750m to their nearest Medium Park and not more than 400m to their nearest Small Park. This standard will be applied to all new developments as well as existing residential areas.'

What change(s) do you consider necessary to make the document sound or legally compliant?

A proper viewshed analysis for different heights of buildings should be used to establish the capacity of the site to absorb development to AVOID significant effects of key visual, landscape and heritage issues.

NG8 - Oxford Meadows SAC

The Submission AAP is unsound as it does not provide appropriate evidence to justify the development.

Recreational pressure

Assessment of the possible human/dog impact on the haymeadows is inadequate. Even limited impact is unacceptable during the growing season (March to July) when the meadows are particularly vulnerable.

Hydrology

Inadequate evidence has been provided in relation to hydrological impacts. A full hydrological assessment is necessary at this stage, not just an 'Interim Hydrogeological Summary Note'.

It would appear that the potential SUDS area is outside the limits of the AAP to the northwest of the A40, and falling within Cherwell District Council. No evidence is provided of co-operation with Cherwell DC to ensure that this is viable. It also appears that this may lie in a similar geographical area to the proposed route for the strategic link road and there is no evidence as to how these conflicting uses could be reconciled.

The hydrological implications of accumulating water in this potential SUDS area should be fully assessed at this stage, not later. For example, it could be that this water is actually needed to enter the ground to feed the gravel aquifer of the Green Belt area adjacent to the SAC. However, without the detailed information appropriate judgements cannot be made.

The 'Geoenvironmental Assessment of Ground Conditions report' does not have complete data on these green belt meadows and is therefore inadequate. In particular trial pits in some of the meadows north of Joe White's lane could not be completed because they were flooded at the time of visit! This implies that they are part of the functional floodplain. It would be Unsound to bring these meadows into the development area without full geological data and therefore knowledge of the hydrological implications for the SAC nearby.

Air quality

Only a Preliminary Air Quality report is available. A full year's air pollution surveying in the Meadows is necessary to get a baseline to predict the effect of the NG AAP on the Meadows. However, monitoring in this area was only begun in Spring 2014. (Early data was collected around the Wolvercote roundabout and nearby roads, but not in the Meadows).

Biodiversity

The APP Submission is unsound in assuming this area can be developed without a biodiversity survey for protected species that cannot be moved.

The impact of development on these meadows cannot be fully assessed until an ecological survey of brown hairstreak butterflies is carried out. A preliminary survey suggests that this is a good potential habitat for this red data listed UKBAP priority species (a Section 41 species), which is present in the Oxford area, and breeding areas need protection.

Great Crested Newts have been recorded in the railway line ditch to the west of the railway that is currently being upgraded by Network Rail adjacent to the Trap grounds allotments. This suggests that newt forage/hunting areas are likely to extend into the proposed development area. It is urgent that surveys for such important protected species are done at this stage to inform the AAP boundary as appropriate.

What change(s) do you consider necessary to make the document sound or legally compliant?

- A more detailed assessment of the potential human/dog impact on the haymeadows.
- A full hydrological survey, including complete data on the Green Belt meadows.
- A detailed Air Quality Assessment, including a full year's baseline data from the meadows.
- Appropriate biodiversity surveys for protected species.

NG11 - Delivery of Infrastructure

The AAP submission document is Unsound as the City Council has not shown that the necessary infrastructure is deliverable and therefore it cannot be considered effective.

NG11 says that '*Planning permission will only be granted where there are suitable arrangements to provide and phase the infrastructure*'.

Para 8.11 of the Submission document outlines the proposed funding sources. However:

- a) Whilst City Deal funding was obtained for Cutteslowe and Wolvercote roundabouts, these funds are allocated to deal with existing problems and not to enable the Northern Gateway. The consultation for these two schemes has only just been completed therefore should be excluded from the NG5 submission AAP text.
- b) The other element of City Deal funding is for the strategic link road. This road is now theoretically excluded from the AAP (para 6.8 Submission Document) but the Access and Movement report assumes that both the on-site and off-site link roads are in place.
- c) The Local Growth Fund bid for £12 million was unsuccessful and the next funding round is not yet known.

It is therefore not at all clear where the significant external funding required for the Northern Gateway infrastructure requirements is to be found.

What change(s) do you consider necessary to make the document sound or legally compliant?

Clarification of the costs of the infrastructure required and more accurate identification and detail of likely sources of funding.

Phasing of the development in line with the Core Strategy Policy CS6.