

South Oxfordshire Local Plan 2034

Publication Version Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	Ms	
Full Name	Ginette Camps-Walsh	
Job Title (where relevant)	Member Beckley and Stowood Parish council, Chairman Beckley and Stowood Neighbourhood Plan Steering Group	
Organisation	Beckley and Stowood Parish Council	
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For information on **sharing your details**: please see page 3

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[Empty box]

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

1. COMMENT

Whole Local Plan Document

Do you consider the Local Plan and supporting documents:

- | | | | |
|---------------------------------------|------------------------------|--|-------------------------------------|
| (1) are legally compliant | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Don't know <input type="checkbox"/> |
| (2) are sound | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | Don't know <input type="checkbox"/> |
| (3) comply with the Duty to Cooperate | Yes <input type="checkbox"/> | No <input type="checkbox"/> | Don't know <input type="checkbox"/> |

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The Local Plan must be regarded as a new Plan. The housing numbers have risen from 22,563 in the previous Local Plan to 28,459 an increase of 26% with no consultation. The number of strategic development sites has risen from 3 to 7. The new Strategic Sites have not received comprehensive appraisals in the way that the first 3 have. No reason or rationale has been given for this considerable increase in housing numbers or sites. This Local Plan must be regarded as a new Plan.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

This Plan needs to undergo a full Section 18 consultation before it can proceed to a Section 19 one and is not compliant with South Oxfordshire Statement of Community Involvement Planning Service – June 2017 Paragraph 4.

See further comments 2-19 on following pages 4-28 of this document

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature: *Ginette Camps-Walsh*

(this can be electronic)

Date: 18th February 2019

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

2. COMMENT

Document / Policy / Paragraph - Main Plan document 2.3. iv) page 15; NPPF on Green Belt; STRAT 1; STRAT 6; South Oxfordshire Statement of Community Involvement Planning Service – June 2017 Paragraph 4
Not legally compliant or sound

Why?

The Plan is not compliant with the new NPPF 13 on the Green Belt, which has been strengthened.

It is not compliant with and in fact opposes **NPPF 134** in that –

This Local Plan is seeking to destroy the Oxford Green Belt and will particularly act against its purposes by –

- a) precisely encouraging urban sprawl around Oxford and the expansion of Oxford city into the countryside
- b) it will allow Oxford to merge and overwhelm villages and communities around it
- c) will encroach into and destroy valuable countryside and the environment
- d) destroy the character of surrounding parishes and villages around Oxford
- e) will prevent urban regeneration within Oxford City by encouraging zoning for business premises instead of new homes.

What is particularly concerning is that there has been no public consultation on destroying the countryside and Green Belt around the south and north east of Oxford and the whole setting of the City of Oxford with its ‘dreaming spires’ and backdrop of green hills, which will be lost forever.

NPPF 135 states ... Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. There has been no such justification presented. Co-operation with Oxford’s unmet housing need has been suggested as one reason, but there is no unmet need and the numbers were not calculated using the correct method – see comments under Duty to Co-operate - Housing Topic Paper – page 8 c). **Paragraph 4.29** supports the second reason given which is that in Oxford City’s Local Plan that the “need should be met within Oxford or very close to its boundaries” but no evidence has been given to support this. In fact comments on NPPF 137 c) below show that new housing near Oxford’s boundary is not only undesirable, but also detrimental and unsustainable, whereas housing near and along rail lines would allow sustainable commuting.

NPPF 137 states ... “the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” SODC has not complied with this. It looked at 15 possible strategic development sites and of the 7 chosen 6 were in the Green Belt. Of those rejected Harrington, Thornhill, Land at Emmer Green. Land south of Great Western Park Land off Thame Road, North Weston Playhatch, Reading Golf Club only 1 was in the Green Belt. There were viable alternatives. The inflated housing figures in this Plan also contribute to this.

NPPF 137 c) - The council’s selection of Strategic Sites within the Green Belt has not been informed by a county-wide transport strategy which would put connectivity not proximity at the heart of the plan to meet Oxford’s unmet housing need. Allocation of the Strategic Sites within the Green Belt does **not** appear to have been informed by discussions with neighbouring authorities which have good rail links into Oxford from where people could commute into Oxford with ease and relative speed e.g., Bicester, Princes Risborough, High Wycombe – Chiltern Line; Didcot, Reading, Swindon – GWR; Banbury, Leamington Spar Warwick – Chiltern and Evesham, Morton-in-Marsh - GWR about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

South Oxfordshire Statement of Community Involvement Planning Service – June 2017 Page 6

This states – **4 Duty to Co-operate**

“Section 110 of the Localism Act 2011 sets out a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The duty to cooperate is not a duty to agree, but we will make every effort to secure necessary cooperation. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the public bodies that we are required to co-operate with.

In addition to these public bodies we will exercise our duty to cooperate with our neighbouring councils which are:

- *Aylesbury Vale District Council*
- *Cherwell District Council*
- *Oxford City Council*
- *Oxfordshire County Council*
- *Reading Borough Council*
- *Vale of White Horse District Council*
- *Wokingham Borough Council*
- *Wycombe District Council*

There is no evidence to suggest that this has taken place regarding commuter access to Oxford City.

NPPF 138 – There has been no consideration of “*ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*”

NPPF 139 - f) The current Green Belt boundaries around the south, north east and east of the City of Oxford are clearly defined using physical features that are readily recognisable and likely to be permanent. To the northwest of the city, the existing Green Belt boundary is the Bayswater Brook, which runs to the south of the proposed allocation, Land North of Bayswater Brook. If this land were removed from the Green Belt, there would no longer be clearly defined physical boundaries for the Green Belt to the north of the city. In the case of the ‘Land North of Bayswater Brook Site’ this boundary is the Bayswater Brook. There are no clearly defined boundaries for the Green Belt if this land were removed from the Green Belt. Many of the fields are delineated by barbed wire fences. The new Green Belt boundary suggested consists of simple hedges to the west and barbed wire and open field to the east

Please set out any modifications you consider necessary

The new strategic sites in the Green Belt around Oxford should be removed from the Local Plan as strategic development sites.

3. COMMENT

Document / Policy / Paragraph - STRAT 13; Green Belt study (September 2015) and Green Belt Assessment of Strategic Sites on South Oxfordshire (January 2019)

Not legally compliant or sound

Why?

Both these studies state for the Lower Elsfield and Wick Farm Sites (now Land north of Bayswater Brook) that – *“Development within the parcel would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford”* and yet despite they have put forward as Strategic Development Sites due to their proximity to Oxford.

Please set out any modifications you consider necessary

Land north of Bayswater Brook should be removed from the Local Plan as strategic development sites.

4. COMMENT

Document / Policy / Paragraph - Main Document 1.6; Policy STRAT 13: Land north of Bayswater Brook; Strategic Site Selection Background Paper 2; non-compliance with South Oxfordshire Statement of Community Involvement Planning Service – June 2017 5.2

Not legally compliant or sound

Why?

Land North of Bayswater Brook - These sites were considered separately in the previous Local Plan as Wick Farm and Lower Elsfield, two separate sites with no linking road. Bayswater Farm had not been considered at all previously and is missing from Strategic Site Selection Background Paper 2. It was not subject to a Section 18 consultation or any consultation set out in the South Oxfordshire Statement of Community Involvement Planning Service – June 2017. This states –

5.2 Who we consult on planning policy

The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the legal requirements for consultation and public participation in respect of local planning documents.

Local communities We will seek to engage with the local community through both our general consultation procedures and if appropriate, through targeted events, (e.g. public meetings, exhibitions and other forums). This is to ensure we capture representative views of the community.

We will work with those promoting development sites through the planning process to ensure that any site assembly is undertaken on a comprehensive basis and that those affected are aware of new planning proposals.

Please set out any modifications you consider necessary

This new site orientation with a major road running through the middle must go through a Section 18 consultation and a proper consultation process. Preferably it should be removed as part of a strategic site from the Local Plan.

5. COMMENT

Document / Policy / Paragraph Main Document 1.6; STRAT 13 - Bayswater Farm; non-compliance with South Oxfordshire Statement of Community Involvement Planning Service – June 2017 5.2

Not legally compliant or sound

Why?

Bayswater Farm is a completely new site for development. It has not been included in any previous iterations of the Local Plan. It has never been subject to a Section 18 consultation or other consultation set out in the South Oxfordshire Statement of Community Involvement Planning Service – June 2017 5.2.

Please set out any modifications you consider necessary

This site must go through a Section 18 consultation and preferably be removed as part of a strategic site from the Local Plan.

6. COMMENT

Document / Policy / Paragraph The Whole Plan; STRAT 1.

Not legally compliant

Why?

The new Local Plan was prepared in a rush. It was due in October '18 but has not available to go through the Council approval process until December. The background documents were not available electronically to the SODC councillors when carrying out the scrutiny process or when the full council voted on it. Few councillors had the opportunity to be fully informed when voting on it. At the SODC Cabinet Meeting on 18th December 2018 many parish councillors, district councillors and local residents made oral submission to the Cabinet sharing their concerns. The Chairman and Chief Executive were in conversation throughout these submissions and did not listen to any of them. The Cabinet did not consider any of the points made and did not discuss or debate any of the points made. The only discussion on the Local Plan was on proposed corrections to wording from the Scrutiny Committee. The approval process is flawed.

Please set out any modifications you consider necessary

The Plan needs to go through a proper approval process by SODC councillors and then a Section 18 consultation as it is new.

B. DUTY TO CO-OPERATE

7. COMMENT

Document / Policy / Paragraph Housing for Oxford City 4.29-4.31; H9; STRAT 2; Housing Topic Paper – page 8 c)

Duty to Co-operate

Why?

Housing Topic Paper – page 8 c) SODC admits – “*Unmet need: The guidance is clear that unmet need from neighbouring authorities should only be added to our plan’s housing need (not requirement), where this has been calculated using the standard method*”. The standard method was not used in Oxford City Council’s Local Plan 3.6 ... unmet’ need figures. In Oxford City Council’s Local Plan, it states “*A new calculation of housing need based on the Government’s standard methodology set out in ‘Planning for the Right Homes in the Right Places: Consultation Proposals’ (2017) was not used*” page 34.

Furthermore, the old SHMA figures were used from 2014, Agreed housing need - 28,000 ('16-36). The newer SHMA figures 2018 reduced the need to 15,100 homes - “the projection which incorporated the 2012 MYE and corrected migration in Oxford resulted in a need for 15,100 homes over the same period”. Why were the new SHMA figures not used?

Oxford City’s Local Plan also states “1.34 There is not the capacity **within Oxford’s administrative boundary to meet all housing need**. As far as possible, **this need should be met within Oxford or very close to its boundaries**, as this will enable new development to be connected to areas of employment and other facilities by sustainable modes of transport. Any urban extensions to Oxford will therefore be well integrated into the city and will maximise the benefit of existing infrastructure. Discussions with the other Oxfordshire districts regarding Oxford’s unmet housing need are progressing positively; three of the neighbouring districts have agreed to accommodate an element of this need and are progressing with their own Local Plan reviews to facilitate this.”

Oxford City can meet its own housing needs. It has the capacity to build over 30,000 houses on approved sites if housing takes priority over employment sites – see analysis of the approved development land from Oxford’s HELAA attached and summary copied below -

OXFORD CITY COUNCIL LOCAL PLAN 2018 HELAA Appendix B: Capacity and Development Potential (Only for Sites Assessed as Suitable, Available and Achievable)

TOTAL DEVELOPMENT LAND HECTARES	301.632
% SOLELY RESIDENTIAL	19%
% MIX RESIDENTIAL OTHER	64%
% EMPLOYMENT USE	13%
highest housing density city centre	100 per ha
MAXIMUM HOUSING CAPACITY ON ALL LAND	30,163

There is no evidence presented in Oxford City's Local Plan to substantiate the need to build houses very close to its boundaries. In fact, the problems of commuting into Oxford have not been addressed in Oxford City's Local Plan and exacerbating this problem is not sustainable. The only sustainable commuting routes into Oxford are by rail. Please see earlier response to **NPPF 137 c)** None of the new Green Belt sites around Oxford has access to rail.

From Oxford City Local Plan -

- The population of Oxford City: 154,600 (ONS 2017 mid-year estimate)
- 4,730 businesses provide 118,000 jobs – 33% of those in the county
- There are more jobs than residents – the jobs density ratio is 1.23
- At least 46,000 people commute into Oxford for work
- 30% of Oxfordshire's jobs are based in Oxford City

No solution to the problem of commuting into Oxford has been suggested and building on outskirts of Oxford will exacerbate traffic congestion on main routes into and around Oxford and on local roads and increase pollution.

The previous SODC Local Plan had no requirement to site Strategic Development Sites near Oxford for this reason.

Oxford City has a shortage of labour and development of even more jobs in the city is not sustainable. Building houses for those with jobs within the City as opposed to prioritising employment developments at the expense of houses, is the sustainable strategy they should use. It would also enable people to walk to work.

Please set out any modifications you consider necessary

There is no duty to co-operate based on incorrect calculation methods. There is no duty to co-operate since Oxford City has no unmet housing need and has the capacity to build all the houses it needs within the City.

Any houses built to help Oxford do not need to be built near Oxford, as the difficulties commuting in have not been addressed. Proximity in and of itself does not generate connectivity. Houses built in the Green Belt around Oxford will exacerbate congestion and pollution. There are good rail links for commuting into Oxford.

The previous SODC Local Plan had no requirement to site Strategic Development Sites near Oxford for this reason.

The inflated housing numbers in the Local Plan need to be reduced. There is no legal basis to meet Oxford's alleged 'unmet' housing need, as they do not have one.

8. COMMENT

Document / Policy / Paragraph Housing for Oxford City 4.29-4.31; H9; STRAT 2; Housing Topic Paper – page 8 c); Oxford City Local Plan HELAA - Appendix B: Capacity and Development Potential (Only for Sites Assessed as Suitable, Available and Achievable)

Duty to Co-operate

Why?

Oxford City in its HELAA (see previous analysis) of the 301.632 hectares available for development (Appendix B: Capacity and Development Potential (Only for Sites Assessed as Suitable, Available and Achievable)) only 19% of the land is solely for residential development, 13% solely for employment and 64% mixed. Oxford City has pursued a strategy of severely restricting development of housing in preference to employment development. A number of sites have been specifically zoned for employment. They will not allow employment land to be used for housing, even though with modern modes of working less space is needed to employ the same number of people. Local legislation protects employment sites from use for housing. An Article 4 Direction has been introduced which removes the permitted development right to change employment floorspace to residential use on Key Protected Employment Sites.

This directive is despite the fact that there are many empty and unused employment sites in Oxford and shops in the centre of Oxford. The former Royal Mail site next to a housing estate has been vacant for many years, but is zoned solely for employment.

Oxford City has deliberately created a housing need, preferring to develop employment premises rather than housing and exporting its housing need.

Furthermore, there are staff shortages and skills shortages reported in their Local Plan -

- *Major employers including NHS, BMW and schools are reporting skills shortages linked to high house prices, which are affecting ability to attract firms;*
- *Universities concerned they will be unable to attract top academics and researchers;*

Developing more business premises and therefore attracting more jobs to the City centre would exacerbate this.

Please set out any modifications you consider necessary

New employment sites and jobs should be created in preference outside Oxford City. This would be beneficial and more sustainable for the environment, health and well being of commuters and would leave more housing development sites in the centre of Oxford for those working there.

9. COMMENT

Document / Policy / Paragraph Sustainability Study

Duty to Co-operate

Why?

This document states that Options for Meeting Oxford City's Unmet Housing Need p 10 – opt for Option 1: Do Nothing; Since there is no unmet housing need this should be the action taken in the Local Plan.

Please set out any modifications you consider necessary

Remove all housing development and other actions to help to meet Oxford's 'unmet' housing need, since they do not have one.

C. SOUNDNESS

10. COMMENT

Document / Policy / Paragraph - **STRAT 13**; ‘Local Plan and CIL Viability Assessments’ (December 2018, August 2018 and February 2018); Viability Study (Dec 2018).pdf – Appendix 6 -181123 Sites 1st page (not numbered) Combined Infrastructure and S106 Assumptions_v4 - – Bayswater Site

Listed costs for site - £91.6 m

‘Infrastructure Delivery Plan’ (935.2 KB) (December 2018, Update) - Appendix 2.5. p 39 **Listed costs for site – total - £92.5 m**

Soundness

Why?

Financial and Economic Viability of Land North of Bayswater Brook Site - There has been no properly assessed viability for this site and it comes bottom in the ranking in these reports. However, the two different costings in these two reports conflict and use different numbers. More importantly many of the significant costs are missing and therefore any assessment invalid.

The particular costs that are missing from both reports are –

- The cost of building a foot and cyclists bridge over the A40
- The full cost of a single carriageway link/bypass road from the junction of the Elsfield Road and the ring road (A40) across the site to A40 between Sandhills and Forest Hill – the cost estimate is not realistic at £50-70m and the lower of these was used in CIL Viability Assessment. The cost of compulsory purchase of the land between the Bayswater Site and the A40 has not been included.
- No costs at all have been included for the alternative road scenario of upgrading the Headington Roundabout.
- Development of a spine road through the site
- Site access
- A cost of £1.4 million has been allocated for buses to the County Council, but they say in their response that they do not subsidise buses.
- Construction of bridges over the Bayswater Brook, which floods
- Alleviation of flooding
- Protection of Sydlings Copse, Wick Copse and College Pond a unique SSSI site at great risk.
- Provision of a play ground
- The costs for provision of a bus service in the Infrastructure Delivery Plan are - £1,400,000 - £2,880,000, but only the lower figure has been used for this and other costs in the CIL Viability
- In their response “Developer Funding – paragraphs 12-14 and Soundness Issue page 3” Oxfordshire County Council states– the current SODC CIL level is insufficient to provide infrastructure, particularly for the Bayswater site.
- There is no cost included for archaeological investigations or mitigation

This list is not exhaustive but shows that the financial and economic viability for this site while questionable using incomplete figures, needs reanalysing properly including all the relevant costs. It is likely to prove non-viable.

Please set out any modifications you consider necessary

A full financial and economic viability assessment needs to be carried out including all the costs. This is likely to show that this site is not viable.

11.COMMENT

Document / Policy / Paragraph STRAT 4; STRAT 13

Soundness

Why?

Strat 4 states that a number of assessments should be carried out on all strategic developments. However, in order to assess sites as to their suitability to become Strategic Sites within the Local Plan the same assessments should have been carried out and have not been for most of the new Green Belt sites around Oxford including Land North of Bayswater Brook, henceforth called 'Bayswater'. The list of assessments is copied below with comments for the Bayswater site -

5. *Proposals to deliver strategic development need to be supported by:*

i) **a Landscape and Visual Impact Assessment;** Some assessment is contained within the two Green Belt Assessments - **Green belt study (September 2015) and Green Belt Assessment of Strategic Sites on South Oxfordshire (January 2019)** which concludes – that development of the site would “lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford.” **Strategic Allocation Landscape Sensitivity Final Report (January 2018)** – this concludes – “A full detailed landscape and visual impact assessment will be required to inform the final sensitivity of the potential development”. However, there has been no Landscape and Visual Impact Assessment from anywhere other than Oxford e.g. the adjoining parishes. The Beckley and Stowood emerging Neighbourhood Plan specifically cites views from Stowood as being as important to preserve. There is also no mention in this or other reports of the numerous foot paths that cross the site and are enjoyed by current residents of Barton, Wick Farm, Beckley, other surrounding villages and Oxford.

ii) **a Health Impact Assessment;** **None has been carried out for the Bayswater site** - although there is will be considerable adverse effects on both physical and mental health from – pollution from the major by-pass road running through the site, safety of residents from this road, loss of local footpaths in the countryside for leisure and exercise and loss of local landscape for mental wellbeing

iii) **a Transport Assessment; Evaluation of Transport Impacts - Stage 3 - Development Scenarios and Mitigation Testing (January 2019)** – This report does not include any analysis of sites around Oxford apart from mention of an A40 link road. It uses 2,036 houses at Wick Farm site rather than 1,100. It mentions an “A40 Link Road (40 mph single carriageway)” and assumes (0% car use for Wick Farm/lower Elsfield development, which is totally unrealistic. There has been no mention, no assessment or report on the impact on local roads or communities of the new development and new by-pass/link road. **Strategic Allocation Landscape Sensitivity Final Report (January 2018)** states “Access off Bayswater Road should be avoided to prevent urbanisation of the road north of Bayswater Brook” – this advice has been ignored.

iv) **an Air Quality Assessment;** **None has been carried out for the Bayswater site** – despite the fact that a by-pass road will be constructed through the site.

v) **an Arboricultural Survey;** **None has been carried out for the Bayswater site**

vi) **an Ecological Impact Assessment;** **None has been carried out for the Bayswater site** – despite the fact that the proposed new development goes right to the edge of a unique SSSI Sydlings Copse and College Pond with no plans to preserve this site or mitigate the high risk from the proposed development.

vii) **a site specific flood risk assessment which takes into consideration the findings and recommendations of the Strategic Flood Risk Assessment;** There has been an assessment of flooding - **Strategic Flood Risk Assessment (December 2018)** – this shows the site has the third highest level of flooding when comparing strategic sites in flood zones 2 and 3. This has been further exacerbated recently by the building of Barton Park, which has increased flooding, although the results have not been studied.

vii) a Heritage Impact Assessment; and viii) an archaeological desk based assessment to provide an assessment of archaeological significance - Heritage Impact Assessment (October 2017) - This report does not include any of the new strategic sites at all including Bayswater - None has been carried out for the Bayswater site – despite the fact that there is evidence of Roman roads near and through the site and a number of listed buildings at Wick Farm.

Many of these crucial assessments have not been carried out at all for the Bayswater Strategic Site. Those that have show the very negative impacts development of the site would produce.

Please set out any modifications you consider necessary

The Land north of Bayswater Brook site should be removed from the list of Strategic Development Sites as the few assessments that have been undertaken show it is unsuitable and other assessments have not been carried out, so the site should not have been put forward. The response from Oxfordshire County Council also questions the viability of this site.

12.COMMENT

Document / Policy / Paragraph Policy STRAT 13: Land north of Bayswater Brook; Proforma Site Assessment - Lower Elsfield Wick Farm Sustainability Appraisal

Soundness

Why?

In this appraisal the conclusion states -

“Lower Elsfield / Wick Farm Combined Site –

Selected site - In combination, the sites provide an opportunity to deliver new homes in a sustainable location adjoining a major urban area, within close proximity to employment and services and facilities. There is also a high potential for encouraging sustainable modes of travel, once A40 and Bayswater brook barriers are overcome.”

This statement relies upon the ‘need to co-operate on Oxford’s alleged, but not substantiated ‘unmet’ housing need. It completely fails to mention the fact that a major bypass is proposed through this site. It does not ‘overcome’ or even suggest methods to ‘overcome’ the major barriers of the A40 and the Bayswater Brook. Compare the statement above with previous appraisal in 2017 where these sites were rejected. The only difference appears to be derived from the duty to co-operate which is based on a false premise and a new road across the middle of the site, which is not mentioned, along with its extremely harmful effects.

The barriers of the A40 and Bayswater Brook have not been addressed. There is currently only 1 bridge over the Bayswater Brook to Wick Farm. and no pedestrian access or access from the site to any road other than through the Barton housing estate. There is direct access to the A40 ring road for the new estate in development of Barton Park, with traffic lights, but vehicles cannot go across the A40/ring road into Oxford as the roads to the west in Oxford are small roads in a housing estate and unsuitable to anything other than access to houses.

Please set out any modifications you consider necessary

The Plan fails to set any detailed plans for this site or access or transport. There needs to be a full proposal and detailed assessments or alternatively remove Bayswater from the Strategic Development Sites.

13.COMMENT

Document / Policy / Paragraph – STRAT 13; Sustainability Appraisal and Appendices – Land North of Bayswater Brook – Wick Farm and Lower Elsfield

Soundness

Why?

This report contradicts itself –

Option Reason for Rejection

Lower Elsfield/Wick Farm combined

“The full capacity of each site when combined was considered to have a significant adverse effect on the site constraints and the wider highways infrastructure. Flood risk from surface water and fluvial is high along the Bayswater Brook corridor and in the east of the site. High levels of harm to the Green Belt would result from the full release of the site from the Greenbelt except the release of two parcels of land”

Reason for Selection

“In combination the sites provide an opportunity to deliver 1,100 new homes in a sustainable location adjoining a major urban area, within, close proximity to employment, services and facilities. There is also a high potential for encouraging sustainable modes of travel, once the A40 and Bayswater brook barriers are overcome.”

This change is not explained as the only difference is a major by-pass road – single carriageway with a 40 mph speed restriction through the middle of the site. This has not been properly planned or indeed planned at all. There is no information on how the site will be accessed. There is currently only one bridge over the Bayswater Brook leading to Wick Farm. Elsewhere the plan also states that Barton is deprived and that making use of the new facilities to be built on this site will address this to a minor extent. However, if there are roads linking Barton to the Bayswater site to facilitate use of new amenities and busses then it will be used as a rat run for commuters. If there is no link then facilities cannot be shared.

Please set out any modifications you consider necessary

There needs to a properly developed plan for the site or it should be removed from the strategic sites.

14.COMMENT

Document / Policy / Paragraph STRAT 13; a Landscape and Visual Impact Assessment; Green Belt study (September 2015) and Green Belt Assessment of Strategic Sites on South Oxfordshire (January 2019); Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2017)

Soundness

Why?

Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2017) – this states

Site 1006 - Land at Wick Farm and Lower Elsfield, Oxford (1) - Not suitable for housing - Approximately 20% of the site is within an area of possible contamination or ground stability issues, approximately 30% of the site is within an area of known archaeological interest and has a cluster of listed assets. 10% site flood zone 3 Suitable No; Available Yes ; Achievable No ; Suitable for housing No; Yield housing 0

Site 1007 - Land at Wick Farm and Lower Elsfield, Oxford (2) - Unsuitable - not in accordance with emerging spatial strategy. 28% of site in Flood Zone 3, 3% of the site is covered by Ancient Woodland and 3% of the site is covered by two SSSI. (One SSSI and one area of Ancient Woodland overlap but this has been taken - Approximately 2% of the site is within an area of possible contamination or ground stability issues.

Heritage Approximately 1% of the site is within an area of known archaeological interest in three clusters, and contains ten listed assets. Ecology Approximately 3% of the site is within areas of ancient woodland and an SSSI. Suitable No; Available Yes ; Achievable No ; Suitable for housing No; Yield housing 0

This site is clearly unsuitable for housing development.

Both **Green Belt Studies** 2015 and 2019 state that - *“Development of the site as a whole would therefore lead to significant harm in relation to urban sprawl, encroachment on the countryside and to the setting and special character of Oxford.”*

Green Belt Boundary

The Green Belt studies state that the A40 and Bayswater Brook form significant boundaries between the City of Oxford, the Green Belt and the countryside. No other boundary exists at the edge of the proposed development that would make a suitable new geographical/topological boundary for the Green Belt. To the north there is a contorted boundary consisting of barbed wire fences across fields.

Landscape and Views

Little if any consideration has been given to landscape apart from its relationship with Oxford, but the residents of Wick Farm, Barton, Beckley and Stowood and Elsfield would also regard it as ‘significant harm’ if this land were taken out of the Green Belt and developed. All these residents enjoy the landscape and views. The residents of Wick Farm and Barton as a green backdrop and countryside enjoyed for leisure. The land rises steeply from the Bayswater Brook north to a maximum height of 141 m behind Stowood on the Beckley ridge and at the south of Stowood 133 m to give views across to Didcot. The villages of Stanton St John, Forest Hill and Elsfield all built similarly along or near the ridge of the hills have important views south towards the proposed link road from the Elsfield Road to A40 and the Bayswater development. These developments would cause great harm to important views and the Green Belt and settings.

“The Landscape Quality and Sensitivity Assessment within the Landscape Assessment¹ shows that – Scenic Quality was assessed as - • high for – flood-plain and pasture, parkland and estate farmland and wooded hills and valleys • medium for – flat open farmland, flat semi-enclosed farmland, open farmland hills and valleys and semi-enclosed hills and valleys Intrusive Influences were assessed as either uncommon or occasional • Other Heritage Values were assessed as - • frequent in - parkland and estate farmland and wooded hills and valleys • occasional in -

flood-plain and pasture, flat semi-enclosed farmland and semi-enclosed hills and valleys • uncommon – flat open farmland, open farmland hills and valleys Visual Sensitivity was assessed as high or medium in all areas apart from parkland and estate farmland and wooded hills and valleys which were rated low, all other areas were rated high or medium.

*The suggested Management Strategy is – • To conserve - flood-plain and pasture, parkland and estate farmland and wooded hills and valleys • To repair - flat semi-enclosed farmland, open farmland hills and valleys and semi-enclosed hills and valleys • To restore - flat open farmland This report shows the importance of the Parish within ‘Oxford heights’ area and **why it needs to be preserved.**”*

1. Character Assessment for Oxford Heights, carried out by Atlantic Consultants as part of South Oxfordshire Landscape Assessment

In the emerging Neighbourhood Plan for Beckley and Stowood, which has been out to consultation a policy is included to protect important views, including those from Stowood towards Didcot, across Wick Farm - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/BECKLEY%20AND%20STOWOOD%20NEIGHBOURHOOD%20PLAN%20-%20Section%203%20Policies.pdf> page 5

“5.1.2. Beckley and Stowood Design Guide

Environment

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

1. *The views from the village and from all the approach roads northwards over Otmoor and adjacent farmland, towards Brill **and towards Didcot.***

2.10.1. The Beckley Conservation Area – Character Assessment

2.10.2 Woodperry Road and New Road Area – Character Assessment

2.10.3. Wick Farm and Lower Farm – Character Assessment

2.10.4. Outer Areas – Character Assessment

The Character Assessment for Wick Farm and Lower Farm in the Neighbourhood Plan show clearly the importance of - 4.0 VIEWS, 5.0 LANDSCAPE and 8.0 SPIRIT OF PLACE - APPENDIX 8. Page 20 - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf>

Footpaths

A number cross the site from A40 along the Bayswater Brook and north to Elsfield village, Lyme Hill (north east of Elsfield) and to Stowood past College Pond and Sydlings Copse. These footpaths are well used and enjoyed not only by local residents of Wick Farm, Barton. Elsfield and Beckley, but also by walkers from further afield e.g. Oxford as a beautiful country walk in themselves or en route to Otmoor. No consideration appears to have been given to the loss of the countryside for these footpaths. Walking down alleys between densely built houses is not a pleasure.

Please set out any modifications you consider necessary

The Green Belt studies, SHELAA and Landscape and Visual Impact Assessment state this site is unsuitable for development, even though these studies are incomplete and do not consider the impact on existing communities. Further studies are required or Bayswater It should be removed from strategic sites.

15.COMMENT

Document / Policy / Paragraph STRAT 13, Health Impact Assessment December 2018

Soundness

Why?

Please set out any modifications you consider necessary

This vital assessment is missing and must be carried out.

This development is extremely detrimental to the health of current residents, particularly those in Wick Farm, Barton, Sandhills, Forest Hill and to a lesser extent those in Elsfield, Stowood and Beckley.

Detriment to Physical Health

Lung Disease

The air quality would be severely reduced for all the residents in the proposed development site and along or near the route of the proposed new link road/by-pass from the Elsfield Road junction to A40. There is significant evidence that air pollution from diesel and petrol fumes and particulate matter from brakes and tyres severely adversely affect health and particularly lung diseases. It exacerbates existing lung disease such as asthma, which is on the rise in the population, COPD (chronic obstructive airway disease) and other disease such as emphysema.

¹

It has been shown to be a cause of cancer. ² Cancer Research UK attribute 3,600 cases of lung cancer to air pollution.

Building a by-pass/link road through the middle of a new development of 1,100 new plus many more existing homes will undoubtedly cause harm to their health, not only lung disease, but also heart, skin and other diseases. It will also affect the health of the local villages and be exacerbated by the prevailing south west wind.

Defra states –

Air pollution, for example from road transport, harms our health and wellbeing. It is estimated to have an effect equivalent to 29,000 deaths each year and is expected to reduce the life expectancy of everyone in the UK by 6 months on average, at a cost of around £16 billion per year. Air pollution also damages biodiversity, reduces crop yields and contributes to climate change. ³

1. British Lung Foundation <https://www.blf.org.uk/support-for-you/air-pollution/whos-at-risk>
2. Cancer Research UK <http://www.cancerresearchuk.org/about-cancer/causes-of-cancer/air-pollution-radongas-and-cancer/how-air-pollution-can-cause-cancer>
3. Policy paper 2010 to 2015 government policy: environmental quality Updated 8 May 2015

Vibration and Noise

It is also well documented that these contribute significantly to poor physical and mental health, including sleep disturbance.

The noise from traffic has been shown to be detrimental to health. According to WHO traffic noise contributes to heart attacks and strokes. ^{1,2} Noise from major roads and bypasses will disturb sleep and generally cause a nuisance and annoyance all the time. The proximity of houses and villages to the proposed new link/bypass road will mean that there will be considerable noise pollution.

There is considerable evidence that vibration from road traffic causes buildings to move and crack, particularly when motorways are near houses and villages. There are a large number of listed buildings near the proposed link/bypass road in Wick Farm, the Bayswater Road and in Forest Hill.

1. *Traffic noise health impacts second only to air pollution, new WHO report says – Transport & Environment - <https://www.transportenvironment.org/press/traffic-noise-health-impacts-second-only-air-pollution-newwho-report-says>*
2. *New evidence from WHO on health effects of traffic-related noise in Europe - <http://www.euro.who.int/en/media-centre/sections/press-releases/2011/03/new-evidence-from-who-onhealth-effects-of-traffic-related-noise-in-europe>*

Destruction of Countryside for Walking

Many residents of Wick Farm, Barton and surrounding villages enjoy walking on the country footpaths around and through the Site and to Sydlings Copse and College Pond. Exercise is beneficial to health. These would be made into alleys between houses and would no longer be a pleasure to use.

Detriment to Mental Health

The removal of the countryside and green environment and sharing of the environment with 1,100 new houses and approximately 2,600+ (occupancy of 2.4 per house ^a) additional people will adversely affect well-being and mental health, as will lack of access to country footpaths for exercise.

Number of dwelling in Oxfordshire 281,480 ¹, population of Oxfordshire 682,400 ² therefore the average occupancy per home is 2.4

1. *Live tables on dwelling stock - Ministry of Housing, Communities & Local Government 6.3.18*
2. *ONS, mid year population estimate 2017*

Please set out any modifications you consider necessary

No health assessment has been carried out for this site and this needs to be addressed urgently.

16.COMMENT

Document / Policy / Paragraph STRAT 13; *Transport Assessment; Evaluation of Transport Impacts - Stage 3 - Development Scenarios and Mitigation Testing (January 2019)*

Soundness

Why?

Oxfordshire County Council state in their submission [*Comment 131 transport page 49*] that

“Reference is made to ‘transport assessment’ having been undertaken. It should be noted that no Transport Assessments have been undertaken. More detailed transport work is required to understand the full cumulative impact of the seven sites.”

Roads

There has been no proper assessment on traffic flows and congestion on any of the Strategic Development Sites in the Green Belt around the ring road, including the Bayswater site development. The traffic on the northern ring road, the A40 and the Headington (Green Road) roundabout is described as being near capacity, but this does not take account of increased traffic from the Barton Park development, which is being constructed. 885 new dwellings and approximately >2,100 new residents. Car ownership in South Oxfordshire is 1.58 per dwelling and nationally 1.16 (*SODC report on National Census 2011*), so the Barton Park development when complete is likely to generate over 1,000 extra cars onto the A40 Oxford ring road. According to 2011 census 32% of Oxford residents travel to work by car, but this rate is likely to increase on the outskirts of Oxford. There will be an additional 1,100 houses generating approximately 1,700 new cars.

There has been no consideration of the impact of the Bayswater development on local roads. Every weekday morning there are queues of traffic from the Headington Roundabout back past the crematorium along the Bayswater Road. There are similar queues from the Marston Road across the Marston flyover over the A40 ring road up the hill on the Elsfield Road towards Elsfield village and along the Woodeaton Road. There has been no mention of this, no study and no projections of how the proposed Bayswater development and new link/bypass road will affect these traffic queues. It will exacerbate congestion, queues, pollution and journey times. These local roads and B4027 are likely to become highly congested ‘rat runs’ into Oxford and from the new 2,100 cars commuting either into Oxford or elsewhere to High Wycombe or London.

Public Transport

There is no direct access to railways. The nearest railway stations are in central Oxford (10 miles 30-52 mins by car, 45-58 mins by bus); Oxford Parkway (5.9 miles 24 minutes by car, > 1 hour by bus) or Haddenham and Thame Parkway (15 miles 36-42 mins by car, over an hour by bus). It is much easier and quicker to access these by car.

Source Bing maps 7.30 am Monday

Buses will be subject to the same traffic delays and congestion as cars and other traffic. There is no easy or quick route across the A40 to the John Radcliffe Hospital. Oxfordshire County Council does not subsidise bus services, so any new services would have to be economically viable. Currently there are buses every 20 minutes from Barton, but as Oxfordshire County Council comments (135 page 52) -

“Conversely, the Lower Elsfield/Wick Farm area (now referred to as Land North of Bayswater Brook), presents significant challenges with respect to bus provision given the difficulties associated with the potential to reroute existing services currently serving Barton and also the significant congestion issues at Headington Roundabout, which cause operational issues to existing services.”

Walking and Cycling

The A40 and the lack of bridges across the Bayswater Brook are barriers to commuting by walking or bicycle. There is no safe way to cross the A40 ring road apart from an underpass near the Headington roundabout. A foot

and cycle bridge has been muted, but is not costed and there are no details of where it might go. Current journey times by foot and cycle from - Wick Farm - OX3 9SE to JR - Headley Way, Oxford OX3 9DU – 37 minutes 1.8 miles using underpass for A40 or slightly less if crossing A40 with no crossing point. Wick Farm to The Covered Market - OX1 3DZ 1 hour 20-30 mins 4 miles – Car and cycle 20 minutes plus parking, walking and bus 45 mins. The policy of 0 cars is not viable and there has been little thought about the practical implementation of this policy.

The proposed development at Bayswater will not allow easy access for commuters into Oxford by any method, it will merely exacerbate existing commuting problems severely.

Please set out any modifications you consider necessary

A full transport assessment and practical detailed plan is required.

17.COMMENT

Document / Policy / Paragraph STRAT 13; **Ecological Impact Assessment**

Soundness

Why?

It is completely unacceptable that an Ecological Impact Assessment has not been carried out, particularly when the Bayswater development is so close to a very important SSSI Site of Sydlings and Wick Copses and College Pond, partly owned and run by BBOWT. This is a unique habitat of ancient woodland, fen, marsh and many important species including –

Flora

Wood anemone, Primrose, Cowslip, Marsh-marigold, Hairy Violet, Wood Spurge, Yellow Archangel, Common, Gorse, Wild Cherry, Crab Apple, Bluebell, Herb-Paris, Ramsons (wild garlic), Bee Orchid, Common Spotted-orchid, Common Rock-rose, Viper's-bugloss, Columbine, Spindle, Amethyst Deceiver, Fly agaric,

Fauna

Butterflies - Brimstone, Orange-tip, , Comma, Purple Hairstreak, Marbled White, Six-spot Burnet, Bloody-nosed Beetle, Glow Worms

Birds - Great Spotted Woodpecker, Great Tit, Red Kite, owls

Red Fox, Weasel, European badger, Roe Deer, Common lizard, Slow-worm, Grass snake, hares, muntjac.

Please also see Beckley and Stowood Neighbourhood Plan page 45 2.9.3. Sydlings and Wick Copses - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20-%20Section%201.1.%20Background%20%26%20History.pdf>

“The diversity of this small nature reserve is quite staggering. Boasting ancient broadleaved woodland, limestone grasslands, reedbed, fen, a stream and rare Oxfordshire heathland, the reserve supports over 400 plant species. The site is also teeming with birds and insect life; butterflies include the purple hairstreak, brown hairstreak, common blue and marbled white”¹ Sydlings Copse and Wick Copse were part of the royal hunting forest that covered the area and included many of the other local woods such as Stowood, and Noke Wood. A stream runs through it arising in Stowood and forms ancient fish ponds with a mounded walkway across. The wood in spring is covered in bluebells, as are Stowood and Noke Woods, signs of ancient woodland. This is followed by wild garlic, primroses, cowslips, honeysuckle, dog roses, orchids and many more. There are numerous butterflies in this ancient woodland. Thames Valley Environmental Records Centre produced a report in 2014 - Ancient Woodland Inventory Revision: Oxfordshire for Oxfordshire County Council. In it it states –

“Ancient woodland is becoming increasingly important in relation to both local and national planning and biodiversity policies. It is an extremely valuable part of our landscape, with many species relying on them for their survival. Woodland can also be a source of carbon-neutral wood-fuel and is important for carbon sequestration, flood alleviation and soil preservation.”

1. BBOWT Sydlings Copse - <http://www.bbowt.org.uk/reserves/Sydlings-Copse>

The grassland areas are grazed in the summer and autumn by sheep, goats and ponies to stop encroachment of woodland. There is concern that domestic animals, particularly dogs will attack these grazing animals. There is even greater concern that domestic cats from the new developments will hunt and kill many reptiles, amphibians and birds.

The sheer increase in the local population of over 2.500 people will destroy these important SSSIs from footfall alone. No protection has been proposed and there is no mitigation that can compensate for the high risk and potential damage.

Please set out any modifications you consider necessary

SODC must be condemned for carrying out no ecology assessment and plan for this very important site, contrary to the recommendations of the Ecologist. The potential damage cannot be mitigated and the Bayswater Site must be removed from the Strategic Development sites on this issue alone.

18.COMMENT

Document / Policy / Paragraph STRAT 13; Heritage Impact Assessment; and viii) an archaeological desk based assessment to provide an assessment of archaeological significance - Heritage Impact Assessment (October 2017)

Soundness

Why?

There has been assessment of heritage or archaeology on this site. This is unacceptable.

In Beckley and Stowood's Neighbourhood Plan is the history of the Parish - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20-%20Section%201.1.%20Background%20%26%20History.pdf> page 22

There is an important Roman Road running through the eastern side of Bayswater site from Alchester to Dorchester. There is another – *“Oxford University archaeologists came and dug up a Roman Road that runs through Stowood at Lodge Farm. It is in perfect condition after nearly 2,000 years.”* This almost certainly runs through the site and has not been investigated.

“Wick Farm

Wick Farm, which used to be known as Headington Wick, was a farming community in the 13th Century. Remains of Roman occupation were found to the north of the farm on the line of the Roman road. Its name suggests that it was probably a dairy farm.

“In diuers countries, Dayrie houses or cottages, wherein they make butter and cheese, are vsually called Wickes”.4

In the seventeenth century Wick Farm was the second largest farm in the parish of Headington. On 17th November 1781, an advertisement to let it showed it was then about 250 acres..... Wick Farm house, the old barn behind the well house, the well house itself and the gate pillars are all listed grade II. The old barn is in disrepair and needs restoration” and the well house is at risk.

- APPENDIX 8. CHARACTER ASSESSMENT WICK FARM it shows – BUILDINGS -

“Wick Farm (also known as Headington Wick) in Barton, Headington was already in existence in the thirteenth century.... The present farmhouse was built in the mid- or late eighteenth century, and is Grade II listed. The barn behind the well house, and the gate piers and walls, are the same age and are also listed structures. The well house that can be seen to the left is older and is Grade II* listed dates from about 1660” (Listing)

<https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf> page 23

The Bayswater site is of historical importance and needs a full archaeological survey and report to preserve important artefacts.

Please set out any modifications you consider necessary

Again, SODC must be condemned for carrying out no archaeological assessment and plan for this very important site. The potential damage cannot be mitigated and the Bayswater Site must be removed from the Strategic Development sites on this issue alone.

19.COMMENT

Document / Policy / Paragraph STRAT 13; Proximity of the Crematorium; Safeguarding the Community

Soundness

Why?

Oxford Crematorium, Bayswater Road, OX3 9RZ this is next to the Bayswater site and the proposed new link/bypass road runs right next to the site, but the effect on those using the crematorium has not been considered.

“Oxford Crematorium opened in May 1939 and is set in 22 acres of well-maintained grounds Our gardens of remembrance are well known for the beautiful daffodil beds, which bloom in the spring. The gardens provide a tranquil setting for visitors and offer a wide variety of memorials, including roses, private gardens and wall tablets. We can also arrange for you to buy niches in a mausoleum.”

It will no longer be tranquil and the additional cars, people, traffic and the link/bypass road will adversely effect those using it at the saddest time in their lives.

The Community

A survey of Parishioners of Beckley and Stowood Parish was carried out as part of the Neighbourhood Plan - Preservation of the Green Belt in the Parish, particularly at Wick Farm was supported by 84% of respondents and was the highest-ranking issue they supported – page 3& 4

<https://beckley-and-stowood-pc.gov.uk/sites/default/files/BECKLEY%20AND%20STOWOOD%20NEIGHBOURHOOD%20PLAN%20-%20Section%202.%20Vision%2C%20Consultations.pdf>

“ Importance of the Green Belt

There was considerable support for the Green Belt and its purposes, particularly in protecting the parish from being part of Oxford City.”

The health, wellbeing, aspirations and leisure activities of the current local residents has not been considered at all.

Please set out any modifications you consider necessary

Again, SODC must be condemned for having no consideration for the local communities for this very important site. There has been little or no proper assessment for this site and those studies that have been carried out cited the great harm from development. The strategic Site of Land north of Bayswater Brook (which also includes land to the south of the brook at Bayswater Farm, never before considered) must be removed.

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk.