



Comments on application ref. 18/02065/OUTFUL - Oxford North

OUTLINE APPLICATION

1. Viability and affordable housing

The Wolvercote Neighbourhood Forum supports the Local Plan policy for the provision of affordable housing for families of existing Oxford residents and also for the city's employees in order to minimize commuting at rush hour and the resultant congestion and pollution. The NPPF (Para 8- Social objectives) states that a sufficient number and range of homes should be provided to meet the needs of present and future generations. The AAP for the Northern Gateway was clear that the city required the provision of a minimum of 50% on this site. It is therefore disappointing that the developer seeks to avoid building any social, intermediate or key worker housing units and has indicated on the application that only market housing will be built. Without affordable housing, it is not credible to claim that "the effect of the Proposed Development, in combination with other proposed residential schemes, will have a long term major beneficial effect on meeting housing need" (Environmental Statement chapter 14, clause 14.9.3).

We object to the application on this basis.

The only justification for a developer seeking a reduction of this number (50%) is if the development is not viable.

TWO's viability statement is unacceptable for the following reasons:

- (a) The calculation of Residual Land Value depends on the stated Benchmark Land Value. The latter is usually subject to negotiation between a landowner and developer. Here, much of the site is and has been owned by St John's for some time and TWO is acting for them, so circumstances are different. Planning Practice Guidance (PPG Para 04) states that the value has to take into account the total cost of all relevant policy requirements, and this would therefore include the provision of affordable housing. The standard viability model used here is therefore not appropriate. The Benchmark Land Value could be reduced by 15%, and that would make the provision of affordable housing viable.
- (b) The value in the viability model for affordable housing on this site (£150 per square foot) is very low considering that affordable housing is 80% of local market rent, and in this locality it could realistically be doubled.
- (c) We would expect it to be possible to negotiate lower professional fees and marketing fees.
- (d) Construction costs are unknown at this stage so these cannot be accepted without question.
- (e) The profit target sought for St John's is not stated and this needs to be made known so that it can be seen to be reasonable. It would be unacceptable if in seeking to achieve high profits from the development there was a reduction in, or failure to provide affordable housing.

It is our view that the Council should not reduce the requirement for 50% affordable housing on this site. It should not accept this viability statement. It should rather be challenging the assumptions and conclusions in the statement and negotiating changes to secure the needed affordable houses. We therefore object to the application.

2. **Quantum**

We note comments made about this application by Merton College, in which it suggests that the applicant has underestimated the potential of the land owned by Merton, which is not part of the current application. A similar situation arises in the south-east corner of the site owned by OCC, where it is alleged that there is sufficient space for 20 houses (ES.6.8). We would object if the size of the completed development overall, including the Merton College and OCC land, were to exceed the amounts agreed in the AAP. The final figures need to be established at the current stage of the process.

Therefore we object to the quantum figures given in this planning application.

3. **Quality of life**

The principle that housing and development should be built on main transport arteries is reasonable for the efficient use of land in order to preserve as much countryside as possible. However, the effects of vehicles on the quality of life of the people living in the vicinity of these arteries have been underestimated and the solutions for mitigating these are inadequate. Air pollution, vehicle noise and safety are fundamental issues.

We object to the application because there is no evidence that proper consideration has been given to this.

3.1. **Noise pollution**

As residents of this area, living in similar proximity to the A34 road, we are already subjected in our houses and gardens, to unacceptable noise pollution from this road, particularly outside of our homes. We note that problems are anticipated for the homes planned beside the A40 and A44, where double-glazing and mechanical ventilation is recommended, however residents should not be expected to stay inside their homes with the windows closed or be unable to use their gardens because of traffic noise levels. We also note the recommendation for buildings to be sited to act as sound barriers and “suitably specified acoustic barriers as boundary treatments” (Environmental Statement chapter 13, clause 13.6.5) both of which we welcome, but we have seen no details of these. Therefore, considering traffic noise, we do not support the siting of new housing anywhere where ventilation fans and keeping windows shut are essential, and so for this reason **we object to the siting of the houses alongside the A40.**

3.2. **Air pollution**

The emerging Wolvercote Neighbourhood Plan does not permit residential development where air pollution levels are such that they are likely to be injurious to health, as defined by the World Health Organisation. There is a legal right to clean air (ECJ, caseC-404/13). Pollution is accepted as a cause of premature death, and as having a harmful effect on small children, and its contribution to cardiovascular and cerebrovascular disease is established, and there is evidence of dementia risk.

The plan to reduce ambient air pollution in central Oxford does not extend to this area of housing and workplaces. Air quality here is already poor and whatever attempts there are to encourage the use of alternative methods of transport, there will be an increase in traffic and consequently an increase in pollution. The projected traffic levels in the planning application are entirely unconvincing. We agree with CPRE's comments on the assessment of the increase in the volume of traffic.

The proposal in the application to continue routing of HGVs along the A40 as far as the Wolvercote Roundabout would create unacceptable air quality for the residents of any housing sited alongside that road. The developer's argument that technology will improve air quality by reducing emissions from cars and HGVs is beyond his control and therefore bears no weight. Even if there were to be fewer petrol and diesel cars, the number of HGVs is not set to decrease. There will be queuing at approaches to the roundabout too and queues increase pollution. The site is also near railway lines where trains are pulled by polluting diesel engines.

Where housing is proposed, we would have expected the developer to submit evidence to show that air quality standards are being met. We do not believe that acceptable air quality is currently achievable on this site. Thousands of residents and workers will be at risk if this planning application is approved.

Therefore we object to this application.

4. **Road traffic**

The promotion of efforts to make transport sustainable is very important because the roads surrounding the site are congested and the congestion and consequent pollution is predicted to get worse. The proposals for the A40 and the A44 and the road linking the two roads through the site will in our view do nothing to reduce congestion and pollution. Few of those working on the site will be able to live there because of the high cost of the housing and it is almost certain that many of the houses will be occupied by people commuting to work elsewhere from Oxford Parkway. The addition of 480 homes, a hotel, nearly 4,400 jobs and the suggestion that the site will become an attractive destination will no doubt counteract any attempt to achieve the modal shift frequently put forward as something that can be achieved here. Traffic lights and lower speed limits may control the traffic flow but queues will be longer, adding to air pollution, and delays have economic consequences. We accept CPRE's comments on the unconvincing figures provided in the application for the likely increase in the volume of traffic.

We do not believe that the once promised and part-funded Loop Farm Link Road with proper signage and controls would make no difference to the traffic: there needs to be a thorough public and independent analysis of this scheme.

TWO's plans for Oxford North make much of an ambitious proposal for a shared-use inner link road, Thomas White Street, that is closed to HGVs which will still have to use the Wolvercote Roundabout to access the A44 from A40 and vice versa. This is completely at odds with the Design Code in the AAP, which states that the inner link road should be as near the north end of the site as possible and should be wide enough to accommodate HGVs. Thomas White Street could easily become dangerous because it might be used as a rat run. Ideally it should not be a through road at all. Any link road should accord with the requirement of the Design Code.

For the reasons stated it is our view that the traffic proposals do nothing to mitigate the expected increase in the volume of traffic generated by the development and consequently we object to the application.

5. **Parking**

It is obvious that there is concern about the consequences of the limited parking provision on the site. It is a good thing to try to reduce car use but providing only 70 parking places for a 180-room hotel is optimistic. The proposed provision of hotel parking in the AAP is one space for two rooms and one for two resident staff. This is more realistic, though it may still be insufficient. The expectation that there will be overspill parking is clear from the proposed measures to control parking in the immediate area. For example, funding is to be made available for a CPZ in Upper and Lower Wolvercote. We are not aware of any support for a CPZ and local residents resent having to pay for permits simply because Oxford North cannot manage its parking.

We object to the application.

6. **Cyclists, pedestrians and siting of housing**

Current crossing provision for pedestrians and cyclists at Wolvercote and Pear Tree Roundabouts is not satisfactory, safe or pleasant to use. Negotiating current traffic, for drivers, walkers and cyclists alike, at the junction with Godstow Road is especially difficult and potentially dangerous because there are no lights or controlled crossings and lane discipline is frequently not observed by cars or lorries. In terms of access alone, therefore, the siting of the new housing is problematic as the essential connections to and from neighbouring areas will be difficult, particularly for pedestrians and cyclists.

The proposed East Side housing will be especially problematic for those other than car users, as all pedestrians and cyclists will be forced to cross major roads. It is indeed unfortunate that the developer appears unable to provide that socially needed "positive relationship to adjoining neighbours" (Design and Access Statement Vol.1 section 11.6, para 3) across the railway line. What is needed here are safe physical links to the Lakeside area, as well as to Oxford Parkway station, in the form of bridges or tunnels.

Links to the areas of housing proposed by the Cherwell District Council to cater for Oxford's unmet housing need also require more attention in these plans. More attention to the design of crossings at the Pear Tree Roundabout is therefore essential.

We therefore object to the proposals for cycle and pedestrian access.

We think that grade separation should be considered at all major road crossings.

7. The Environmental Statement

There are a number of very unsatisfactory issues and unacceptable proposals contained in this statement contrary to the AAP and the Neighbourhood Plan in addition to those in respect of views in sections 8-11 below.

Biodiversity

It seems extremely likely that there will be an overall loss of biodiversity on the site, which breaks NPPF rules, and also Policy GBS5 of the emerging Wolvercote Neighbourhood Plan. Developers should be working towards an increase in biodiversity, but on Oxford North there is no chance of that happening, as a Greenfield site is being changed into one which is mainly urban in nature. We agree with Natural England that this development needs to show a net gain in biodiversity.

7.1 Hedgerows

The Northern Gateway AAP states that “opportunities will be taken to create links between natural habitats to join up wildlife corridors”, and “Development should be designed to incorporate existing landscape features that add value to the site where possible, and to minimise loss of trees and hedgerows” (Para 7.13). However, the ES states that in total, 89% of the existing hedgerows on the site will be destroyed during construction. Although new hedges will be planted, the disruption to biodiversity and to existing wildlife corridors is severe by any standards. Even if they are not assessed as important under the Hedgerow Regulations, many existing hedges provide for insects, which are diminishing alarmingly according to recent surveys, and are foraging areas for protected species such as bats and different species of birds.

Greater efforts should be made to retain existing hedgerows on site as the AAP requires.

7.2 Trees

The ES tree survey shows a total of 66 trees on the site, of which almost 60% will have to be removed to enable the development to go ahead as currently planned.

Greater efforts should be made to retain trees on site in accordance with the requirements of the AAP.

In addition, consideration should be given to the planting of new trees off the site which in years to come will replace the trees that currently form a useful screen for the planned high buildings on site.

7.3 **Bats**

It seems that a number of difficulties were experienced in the collection of data about bats, which was limited to only 4-nights data at 2 locations (Para 4.2.1). This would appear to be a poor basis for a survey.

Tree 22 is known to be a roost for Soprano Pipistrelle bats, which like all UK bats, are a European Protected Species. Additionally, there will be considerable disruption to many other bats which commute and/or forage in the existing vegetation, almost all of which is to be destroyed.

The rules on the protection of bats should be complied with.

7.4 **Other Protected Species**

It is clear from the summary in Table 7.7 showing the potential effects on various protected species that several will be permanently adversely affected, including bats and a variety of breeding birds. This will be because of the destruction of their habitat.

The application should be refused as it does not comply with policies on biodiversity.

8. **Heritage and views from the Wolvercote and Godstow Conservation Area**

The Northern Gateway AAP NG7 makes clear that any new development plans will be required to show “an understanding of the area’s heritage, setting and views. In particular, applications will be required to demonstrate how the Wolvercote and Godstow Conservation Area, and views of, into and out of the site have influenced proposals”. The application refers to the area at the northern edge of the CA, but states that it has no historical contribution to make to the CA. The ES (Para 8.10.43) refers to the Conservation Area Appraisal, which mentions the contribution of the commons to the greenery and rural character of the wider CA, and the contribution of the canal to its tranquillity. The development will affect the views out of the CA, and will certainly not enhance the “rural idyll” of Wolvercote. The view and photomontage of EDP3 show that the current rural nature of the view from a part of the CA is ruined by the view of planned buildings.

This is not in compliance with NG7.

We therefore object to the planning application.

9. **Views from Port Meadow**

It is clear from the description of the site’s position in Para 3.19 of Appendix 6.1 that the developers are emphasising the presence of all the existing road and rail networks, and the current edge of development on the north side of Oxford in order to claim that this is already an urban environment. To do this, when large expanses of common land are within 200 metres of the site, is not taking into proper account the importance of the heritage of Wolvercote. This is why it is really important to protect views of the site from Port Meadow and Wolvercote Common and Green. In particular, the height of the Red Hall, which will be visible from Wolvercote Common and Port Meadow, is

unacceptable. Mistakes have been made in the past where buildings have been erected which unnecessarily spoil views from these areas.

ES Para 6.5.52 describes how views of the development from Port Meadow will be “significant” and “major/moderate”. As a SSSI and a highly valued stretch of ancient common land, it is vital that views from Wolvercote Common and Port Meadow are protected. EDP 12 shows that the development will be visible, and reliance on “intervening vegetation and existing built form” for mitigation is highly unsatisfactory. Over time, these mature trees will need replacing, and yet the development offers no possible solution to this by offering to plant new trees off site.

ES Para 6.5.53 is most unhelpful. Merely saying that “The conversion of any greenfield site to a major development site would yield such an outcome (significant effects)” misses the point. The developers are right in saying that “most people would see the visual and sensory change from greenfield to development as adverse.”

We therefore object to the planning application.

10. Building heights

The adopted AAP contains the following section (UF04):

“Maximum and minimum building heights are specified for each character area. These are based on creating a denser core at Cowhill, similar in scale to Oxford City Centre, surrounded by domestically scaled development.

In order to reinforce the character of the public realm and legibility, visual interest should be created by varying the height, massing and form of buildings so that they align with visual axes, nodes of activity, and the street hierarchy. At corners, for example, the visual prominence and legibility of a corner location should be reinforced by the main entrance, massing or articulation of the façade.

All proposals will need to comply with the requirements of Policy NG7 that new development has been designed with an understanding of the area’s heritage, setting and views. In order to comply with policy NG7, the numbers of storeys and/or the heights of storeys may need to be reduced.....”

The plan should be to either move high buildings away from visible areas or substantially reduce the proposed height of the buildings.

11. Sustainability

If the developer is serious about using low and zero-carbon energy, photovoltaic panels should be installed on all buildings with sloping roofs, not just on “some buildings” or domestic buildings only. This site is likely to create a huge electricity demand, with no guarantee that the generation of that electricity off site will be low-carbon. Therefore the more electricity that can be generated on site the better.

The current plans fall far short of what could be achieved in what should aim to be an exemplary sustainable development. On this basis we object to the application.

12. Drainage

We have noticed the concerns expressed by Thames Water about the adequacy of foul drainage and need to be assured that this issue has been resolved.

RESERVED MATTERS – Phase 1A - Red Hall and Workspace

We object to the reserved matters application on the following grounds.

1. Generally

Scale and style.

We consider that these buildings are too high. The designer's declared reference to buildings in the Victorian suburb of North Oxford, situated nearly a mile away from the site, and introduced at a larger scale to these green fields surrounded by 1930s suburbs results in a style and form which is alien to the site. The reference is only made to gable ends and not to side elevations. The result is three large industrial style sheds, which are inappropriate here.

Impact.

These proposed buildings are at variance with the requirements in the emerging Wolvercote Neighbourhood Plan that the scale of buildings and the material used should be in sympathy with the surroundings. The ground level of the site here is 10 metres higher above sea level than Port Meadow and the Red Hall is 24m high with a 7m roof, so it will be plainly visible from Port Meadow. In comparison, existing buildings around Port Meadow are about 9 metres high (3 storeys).

Sustainability.

These proposed buildings do not demonstrate a serious commitment by the developer to their vision of sustainability, as stated in the DAS.

2. The Red Hall

Form.

The high level cantilevered roof canopy is unnecessarily intrusive and cannot be justified as a shelter from weather or for effective shielding from the sun

Design.

While we appreciate that this site seeks to have a distinct character, the mass and aggressive colour of the Red Hall is not appropriate for a semi-rural location overlooking Port Meadow. The proposed profiled metal sheeting, together with the horizontal bands of glazing will reinforce the industrial appearance of this building.

Materials.

We also have doubts about the long-term appearance of the material, particularly as it could be susceptible to fading (because of its red colour) and to staining by nearby trees.

3. **Workspace buildings**

Facade design.

Use of external stairs to add superficial interest to the facades is a simple but crude device, which appears here to be an afterthought rather than an integral part of the design. Without these stairs these facades would be bland in appearance, as is the Red Hall. The travel distance from inside the building to each exit is governed by the point at which the floor meets the stair landing, rather than where it would be desirable to have an exit. The exposure of the stairs to the weather is undesirable and should be unnecessary in a good quality modern building. These stairs will not serve as a means of escape for disabled people.

Roof plant room design.

We are concerned about the finite (possibly insufficient) size of plant rooms especially in workspace blocks, as indicated on the sections. If insufficient space is allowed this equipment will end up outside, damaging the appearance of the skyline.