



SANDHILLS THREATENED BAYSWATER FARM FIELD (historically registered as an AONB) WITH DEER RUNNING TOWARDS THEIR THE PROTECTED BAYSWATER BROOK UNDER THE TREES

Points on Main Modifications SODC 2034 – Anne-Marie Sweeney

My main modification to the plan is the exclusion of Sandhills Bayswater Field site from Strat 13 for the reasons argued below.

Many of these points and responses to Inspector [REDACTED] MM's, are relevant to the main development in STRAT 13 and I strongly believe that they make the whole of Strat 13 unsustainable and it should be removed and the SSI of Sydlings Copse and College ponds protected. I have, however, focussed my response to [REDACTED] MM's to the issues affecting Sandhills.

The Main Modifications proposed are not deliverable, not justified, not effective and not safe for the Bayswater Farm Field in Sandhills. It should not be included in the Local Plan SODC2034.

- They cannot compensate for the loss of this high functioning green belt of beautiful landscape and recreational value to the local community, as evidenced in all previous planning rejections, it will be a severe loss of amenity.
- The plans and the modifications will result in evidenced great risk and damage to the priority protected habitats in the area.
- They do not overcome the serious inadequacies of access to and from the site.

The main strategic argument for building on this site is based on a seriously flawed assumption that proximity is a proxy for access.

- *“Proximity to Oxford for walking and cycling”* is undermined by the 2 miles uphill return journey from Oxford and that the only cycling and walking route is through the noise and air pollution of the busy, often gridlocked A40.
- *“Potential access to public transport links”* This does not qualify as sufficient reason to destroy protected green belt status. Less than 27% of journeys are by walking, cycling or public transport combined, thus rendering this an INAPPROPRIATE reason.
- All transport studies evidence the great majority of journeys, up to 70%, are by car, only 5% of journeys in this eastern side of Oxford are by bus.

Oxfordshire County Council has stated in July 2020 regarding the Bayswater Field site that:
“Transport links are NOT a good enough strategic reason to build on this Green Belt Land.”

They also say that the developer’s traffic plan for the BF field site “does not adequately describe proposals for any solutions”

Policy STRAT13: Main Modification 60 Land north of Bayswater Brook

“As a first priority, these should provide high quality pedestrian, cycle and public transport connections into Oxford to maximise the number of trips made by non-car modes, and measures to discourage car based development. If, having taken the impact of these measures into account, significant residual impacts on the highway network are still predicted new highway infrastructure will be required to mitigate those impacts”

The Inspector’s cavalier “suck it and see” approach on traffic recommendations is irresponsible. Improvements to cycle paths, underpasses and the increasing of bus routes, though desirable, will not significantly reduce car use from the built sites in Strat 13. There is absolutely *no* evidence for this. The Barton sites are on top of a long steep hill up to the Green Rd Roundabout and up from the Marston interchange. Communities will face possibly years of gridlock while wrangling takes place over who will pay for the “new highway infrastructure” and determine what disastrous route will be taken.

We are entering into a serious recession – The Inspector is agreeing to the new estates being built with NO stated liability for the developers to pay for the extensive new road infrastructure required for Strat.13.

Main Mod. 60 “ If more detailed evidence indicates that the preferred mitigation is a new link road, land will need to be identified and secured for delivery of this in consultation with the land owners and County Council;”

The LINK Road: The proposal of a link road to London from Strat 13 to the A40 close to Thornhill P&R will turn Sandhills into a traffic island surrounded by motorway access roads. It will be a disaster for Sandhills residents and for biodiversity especially in the protected habitats of Bayswater Brook.

MM2 & MM4: “... Support growth in areas that reduce the need to travel, minimising pollution and carbon emissions ...”

There is no question that the development at Sandhills Bayswater Farm Field will **increase** a growth in car travel from London commuters “escaping to the country”, who will be the main marketing targets for any houses built on this site situated at the most easterly area of the city.

Pollution and carbon emissions will be increased as will traffic gridlock. This is especially the case through the inappropriate roads through Sandhills and Barton.

This planning proposal is against planning law as stated in the NPPF planning policy framework - [national planning policy framework - gov.uk](http://national.planning.policy.framework.gov.uk)

NPPF 143 Inappropriate Development is by definition, harmful to the Green Belt AND SHOULD NOT BE APPROVED

NPPF 144 the given “very special circumstances” are CLEARLY OUTWEIGHED BY THE POTENTIAL HARM to the Green Belt *by reason of inappropriateness and other harm resulting from the proposal*

All previous planning applications were rejected as “inappropriate development” under planning laws that are still as pertinent today within NPPF guidelines

MM 60 Provision of *sustainable* transport connectivity ...b. road access from the surrounding road network

NPPF 108 “it should be ensured that b) **Safe and suitable access** to the site can be achieved for all users”

The lack of safe road to the access to site and the risks of harm from this inappropriate access to the Sandhills and Barton communities especially to school children walking to school.

Unrealistic sustainable transport ‘*connectivity*’ will not resolve the access problems of the site as cars, electric or otherwise, will be the major transport from BF field and delivery vans emergency vehicles, HGV, especially heavy construction plant will be passing on **highly unsuitable** roads, built in the 30’s, through Sandhills.

The proposed access routes in from Burdell Avenue via Merewood and Delbush Avenues and up to the A40, especially at school times, are at peak capacity. Emergency vehicles have had problems gaining access. Another 300 vehicles from this flawed plan of 150 houses will aggravate the already serious congestion both in Sandhills and in Barton. The turning circle at the bottom of Burdell Ave will become unsafe with queued traffic to enter the site.

Many school children walk along with parents, baby in prams and toddlers along the bridle way from Barton to Sandhills School and back again to avoid the busy A40 air pollution and to enjoy the healthy landscape. Negotiating traffic at Burdell Ave crossing the bridleway to enter the site will prove difficult and dangerous. Traffic will be greatly increased at the Barton queuing along the narrow single track road crossing the entrance to the bridle way.

At the very end of Burdell Ave is a supported home for independent living for vulnerable adults chosen for the peace and safety of that area of Sandhills. The severe disruption of heavy plant and constant cars passing their home within four metres to the sole entrance to the site will exacerbate anxiety and risk health & safety, limiting their use of the bridle path where now they walk independently. What mitigation is possible for this?

The extra traffic also passes the entrance used for the school in Delbush Ave. Large and dangerous heavy plant and delivery trucks will put school children at risk.

The exit via Hawkes Close is on a steep narrow slope to a 'blind' T junction on to a single track road completely unsuitable for any volume of traffic and highly dangerous in icy conditions or poor visibility. It opens up the possibility of an A40 RAT RUN through Sandhills to Barton and the North to avoid Green Rd Roundabout congestion.

NPPF 15.170 Conserving and enhancing the natural environment Planning policies and decisions should contribute to and enhance the natural and local environment by: **a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils....b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services ± including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;**

DESTRUCTION OF HIGH VALUE LANDSCAPE – the Bayswater Farm Field is part of a “beauty spot” and was registered as AONB (under the Countryside Act 1949) see above 2020 photo of the field

The destruction of this beautiful landscape by building on it is regarded by residents as vandalism, destroying nature that can never be replaced there are no policies that can mitigate for this. As NPPF 15.170 states it should be CONSERVED, ENHANCED AND PROTECTED

NPPF 175 a. When determining planning applications, local planning authorities should apply the following principles: if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, THEN PLANNING PERMISSION SHOULD BE REFUSED.

MM48 3 (x) [new] New criterion: x)a net gain in biodiversity which is integrated into the masterplan through the creation of priority habitats, and significant native tree planting, **with any residual impacts offset through the ecological improvement of a named site in South Oxfordshire under the promoter’s control in line with an agreed management plan or a recognised biodiversity offsetting scheme.** Bespoke biodiversity paragraph following discussions with the Inspector.

BAYSWATER FARM FIELD IS AN AREA OF HABITAT SPECIAL PROTECTION AND WOODLAND PRIORITY HABITAT NETWORK SIGNIFICANCE (DEFRA OCT 2020)

The special combination of mixed Woodland (including mature oak, ash, maple, birch and traditional orchard) and the protected waterway of Bayswater Brook, together with the peace and quiet of the limestone fallow grass land, has created a relatively undisturbed, special environment for wildlife habitat ***THAT CANNOT BE RECREATED ELSEWHERE without the impossible duplication of this special landscape.*** The relevant key mitigation is not to have any housing within 150 metres of the protected area. **Any** urbanisation on this field will put protected habitats AT SERIOUS RISK through

the noise and pollution of the building site and the ongoing increased footfall, noise & light pollution and close proximity to traffic and roads within the completed estate.

The area surrounding the brook at Sandhills is **designated an area of “Countryside Stewardship”**

Scoring Woodland Priority Habitat Network” as published by DEFRA and the Forestry Commission

– urbanisation will result in a seriously detrimental effect on habitat and biodiversity.

As Wild Oxfordshire states "*Wildlife of important habitats such as that found on Sites of Special Scientific Interest (SSSI) and Local Wildlife Sites (LWS) cannot survive indefinitely in isolation, but need to be part of a wider network of habitats connected at a landscape scale.*" The threatened site is positioned in the centre of an important landscape triangle of Shotover, Sydlings Copse, Triple SSI and Otmoor. It, thus, plays an important part in a connected wider network of biodiversity.

If this is destroyed there are NO actions of mitigation or “offsetting” that can replace this loss.

Even a *minimum* of 150 metres buffer zone from the edge of Priority Protection which extends almost a third into the width of the field, will NOT, protect these threatened habitats. BF field is at its widest 170 metres wide. It is totally unfeasible to build on this site and not harm protected habitats and bio diversity listed by DEFRA.

52 3. Proposals for development on the site should seek to achieve a net gain in biodiversity. Any residual biodiversity loss should be offset through a recognised offsetting scheme.

The reality is that MM52.3 will contribute to: ***“The continued fragmentation and loss of connectivity across the county’s landscape affecting the future viability of habitats and species.”*** State of Nature in Oxfordshire 2017”

OXFORD CITY LOCAL PLAN protects Bayswater Brook Network 5.1 stating “Oxford benefits from a wide range of green spaces. There are also many brooks and streams, for example ***Bayswater Brook*** and Northfield Brook, *which form part of wildlife and movement corridors.* These green and blue spaces and features perform important functions both individually and as part of a wider network” OCC will deny planning permission “if existing tree cover and semi-rural landscape are not enhanced and wildlife corridor function of the brooks retained.”

“The AECOM assessment of Sidlings Copse (Para 4.111) fails to protect Sidlings Copse and College Pond SSSI by using a substandard ecological assessment which lacks assessment of how effective the measures are to reduce the impact of housing.” **(Oliver de Soissons, Chartered Institute of Ecology and Environmental Management- CIEEM)**

The Council’s own ecologist warned that the site should not be selected without a detailed ecological impact assessment of the SSSI.” We are concerned that AECOM is the agent for the Sandhills site and will apply a similar, questionable “ecological assessment” to BF Field to justify development that lacks expert evidence. Empty mitigation policies should have no place in the Local Plan. A full independent EIA, is required by law conducted by a fully qualified professional (for example a member of the CIEEM) to establish proper needs and must be carried out before any decision to develop is made. This has not been done in BF Field Sandhills..

Mitigation policies are NOT going to protect or replace the biodiversity of the BF Field *and the intricate interrelationship of species, habitats and landscape that have developed together over centuries*. **VITAL HABITATS WILL BE HEAVILY REDUCED AND FRAGMENTED** into patches not big enough to support the complex ecological communities such as those found on the BF field, wood and waterway.

This is one of the few references made by Inspector Bore to the Sandhills site:

“Add new criterion: ix) that delivers higher density development (a minimum of 45 dph) along key frontages, transport corridors.....**and the south of the smaller site**, to respond to the existing adjacent development, *provided it does not adversely impact any heritage assets or their settings, and provided that it respects the character of, and living conditions within, neighbouring residential development*. This will be interspersed with green links and public access to attractive walking routes. “

Our greatest “*heritage asset*” is the beautiful high value landscape of the Valley with its woods and hills beyond, historically registered as an AONB. The ‘*adverse impact*’ of an estate built on BF field would be devastating to the area and has been a main reason why **ALL** previous planning applications have failed.

NPPF 98: Planning policies and decisions should protect and enhance public rights of way

“Green links and public access to attractive walking routes. “ These are nice sounding platitudes straight out of a marketing brochure, but the reality is our historic bridle way will cease to be a green link and an access to attractive walking routes”. The ancient bridleways character transformed at the section where it is now *most* accessible and beautiful and would instead become a back alley between two housing estates.

THE LOSS OF SANDHILLS ONLY GREEN SPACE IS A SERIOUS LOSS OF AMENITY ESSENTIAL FOR OUR HEALTH & WELLBEING. Sandhills has no park but we have our bridle way to use to meet and chat with other walkers and enjoy the outstanding natural beauty of our landscape and breathe in the fresh air away from the A40 motorway access road. It is widely used by groups like the Ramblers and the children’s Forest School

The ancient bridleway dates back to Norman times leading to Forest Hill mentioned in the Domesday book. John Milton looking down on the beauty of the bridleway’s valley, towards the city in 1643 wrote his poem Forest Hill.

The bridleway was incorporated into the Oxfordshire Greenbelt Way opened in 2007 by Boris Johnson, linking 50 miles of beautiful green belt. Safe and relaxed walking would be destroyed.

This development cannot “*respect the character of, and living conditions within, neighbouring residential development*. By destroying the landscape that Sandhills is set in, it will destroy the original design of existing community of Sandhills, as first garden suburb in a semi rural setting of avenues **leading down to the focal points of the beautiful BF field**.

NPPF 180b Identify and protect tranquil area prized for the recreational amenity The destruction of this local beauty spot would be a significant LOSS OF AMENITY for leisure, health and wellbeing. *“The site field is within an area that was designated under the National Parks and Access to the Countryside Act, 1949 as **an Area of Outstanding Natural Beauty** and the development would be detrimental to the amenities of the locality and the rural landscape “(Oxon County Council 1973 refusal of permission for development).*

“The Policy requires compensatory measures to be delivered to remediate for the removal of land from the Green Belt that would deliver compensatory improvements on remaining Green Belt.”

Inspector Bore

Once destroyed by a building site, this beauty can *never* be replaced by tokenistic “enhancements that would deliver compensatory improvements on remaining Green Belt.” The scale of landscape loss is too considerable.

Anne-Marie Sweeney Nov 2nd 2020