

Risinghurst and Sandhills Parish Council



2nd November 2020

South Oxfordshire Local Plan: Proposed Main Modifications Consultation

Consultation response by Risinghurst and Sandhills Parish Council

Dear Sir/Madam,

The Parish Council would like to make the following comments with respect **to STRAT13 – Land North of Bayswater Brook (LNBB)**:

1. **MM9 – Policy STRAT6: Green Belt:** *“The Policy requires **compensatory measures** to be delivered to remediate for the removal of land from the Green Belt ... enhancements that would deliver **compensatory improvements** on remaining Green Belt.”.*
 - In general, the removal of land from the Green Belt around Oxford should be kept to a minimum.
 - There would seem to be no justification to remove the relatively small, totally separate site of Bayswater Farm Field (BFF) at Sandhills from the Green Belt. It is the only Green Space in the locality for residents. It is very important for their physical and mental welfare and well-being as has been amply demonstrated over the past months during to the current pandemic.
 - Bayswater Brook has been identified as part of **Oxford’s Green and Blue Infrastructure Network¹** and *“... 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”*. As stated in ¶15.2 *“It is important to protect a network of green and blue spaces across Oxford for different needs such as recreation, biodiversity and flood protection”*. Therefore, any development close to these “corridors” should be avoided.
 - The area surrounding Bayswater brook at Sandhills is designated an area of **“Countryside Stewardship Scoring Woodland Priority Habitat Network”²** as published by the Forestry Commission. It should not be interfered with by any development and subsequent increase in human footfall which will result in a detrimental effect on the local habitat and biodiversity of the brook.

¹ Oxford City Local Plan 2036 §5

² *Countryside Stewardship Scoring Woodland Priority Habitat Network England 2016/2017*, Forestry Commission, updated March 2020



- Sydlings Copse and College Pond SSSI is a nationally recognised small nature reserve with a “staggering diversity ... Boasting ancient broadleaved woodland, limestone grasslands, reedbed, fen, a stream and rare Oxfordshire heathland, the reserve supports over 400 plant species ...”.

Despite the proposals to minimise the impact of any development, the increase in footfall and close proximity of the development will undoubtedly damage this fragile habitat.

- There are no compensatory measures or improvements possible for (i) the residents of Sandhills if building goes ahead on the BFF site or (ii) for the protection of Sydlings Copse SSSI.

We suggest that SODC removes STRAT13 site completely from the Local Plan including the Bayswater Farm Field site. The latter is not a strategic site – it will provide ~120-150 dwellings, it is only linked to the STRAT13 strategic site through previous ownership and business arrangements pertaining in 2019.

2. MM17 – Policy STRAT13 – Land North of Bayswater Brook (LNBB)

- 2.1. **MM17 Para 2(vi), p71, Para 3(iii) p.72, Para 4.115 p.69** describe the modified transport policy that will cause traffic to escalate; the need for additional infrastructure including ... “it is anticipated that the main access for the site will come via a remodelling of the Marston interchange with an additional access onto Bayswater Road”

Traffic Congestion:

- Existing roads that service the villages adjacent to LNBB are already congested with traffic. Any new housing within LNBB will generate considerable additional traffic/vehicle journeys as limited public transport provision is proposed and journeys will be required that have no public transport provision. Therefore, any development on LNBB will require significant new road infrastructure in addition to any modification to Marsh Lane junction.
- Bayswater Road is a main arterial route into east Oxford and Headington from surrounding villages and is already extremely busy at commuting times of the day. Road access onto Bayswater Road from the LNBB site will lead to increased traffic chaos at these times and increased traffic on roads through villages (eg Forest Hill) which are not suitable for HGVs etc.

Relief Road/Bypass

- Extension of the road through the main LNBB site eastwards to the A40 between Sandhills and Forest Hill junction will destroy the *Woodland Priority Habitat* of Bayswater Brook and would require bridging the brook at considerable expense – who will fund this construction? Is a major crossroad at this Bayswater Road junction feasible or indeed safe at the proposed location?
- What is the real purpose of an extension to the link road? If it is intended as a relief road to reduce traffic along the northern bypass and Headington roundabout, ie a bypass of a bypass, then it will increase the safety issue at the Bayswater Road junction, and will mean that Sandhills will become a “traffic island”: surrounded by an extremely busy and noisy road to the south - the A40 London Road, and a link road/bypass to the north – another noisy road. This is unacceptable to residents.



The current levels of noise due to the A40 London Road are somewhat mitigated by the Green Space we currently have to the north of the estate.

- This link road, extending eastwards to the A40 will needlessly cross the Bridle Path, a heavily used route used by walkers. This route should be avoided to preserve the countryside access rights of riders and pedestrians.

Bayswater Farm Field (BFF) site

- The proposed access to BFF site promoted by the owners via Burdell Avenue on Sandhills and Hawkes Close off Bayswater Farm Road are totally inadequate. These are narrow residential roads, not constructed for heavy traffic. Hawkes Close, a private road, has a slope of 7% which in the winter becomes very hazardous with ice or snow at the T-junction with Bayswater Farm Road.
- If development did go ahead on this site, then there is the potential for a “rat run” between Sandhills estate and Barton, to avoid the already congested roundabout at Headington. This would lead to a safety issue for residents and for school children and walkers using the bridle path.

We suggest that for the above reasons, the Bayswater Farm Field site be removed from the Local Plan as there is no reasonable access to the site through the existing roads as proposed by the developers.

2.2. **MM17 Para 3 point 3** *suggests that Oxfordshire County Council --as highway authority for the district—is prevented from insisting on the inclusion of adequate transport infrastructures in the ‘Masterplan’ for the site.*

- All local communities affected by LNBB development should be consulted on the Masterplan. There should be agreement with the LPA, Oxford City Council and Oxon County Council.

We suggest that the Local Plan is amended to include wider consultation with local communities and “agreement” between the 3 authorities.

2.3. MM17 Para 4.111 Sydlings Copse SSSI

- The proposed development plan for STRAT13 fails to protect *Sydlings Copse and College Pond SSSI* by referring to a substandard *Ecological Impact Assessment* which lacks information/data of how effective the measures are to reduce the impact of housing. A more in-depth EIA by an independent ecologist must be undertaken before planning for this site goes any further.
- This SSSI can only be irreversibly compromised and ultimately destroyed by any development on the LNBB site despite any mitigation or remedial measures proposed. Closer footfall to the SSSI will mean inevitable deterioration of the habitat affecting wildlife and protected plants.

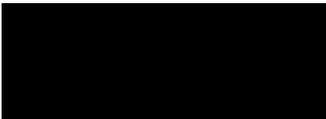
We recommend that STRAT13 be removed from the Local Plan to ensure protection of Sydlings Copse SSSI for future generations.



In conclusion, if the proposed development sites within the Local Plan remain unaltered after this Consultation process, we believe SODC Councillors should vote to reject this Local Plan *in toto* and develop a new plan that takes into consideration:

- i. the very different conditions now existing due to the pandemic, the resulting new working arrangements etc; the importance of Green Spaces for health and wellbeing of residents
- ii. the significant change in retail activities and use of commercial property within the city of Oxford which would allow for a change of usage to residential accommodation, allowing a greater number of dwellings to be accommodated within the city, thus reducing the need for housing within the Green Belt.

Yours sincerely,



Dr David Adams

Chairman - Risinghurst & Sandhills Parish Council

