

12th May 2023

Re: Obsidian Outline Planning Proposal for a new housing development to north of Cropredy

Cropredy is a village settlement that sits within a rural area dominated by farmland and wooded areas. The village is highly sensitive in relation to its historical character, conservation areas, listed buildings and the presence of the registered Battlefield of Cropredy (1664); all of these are features that should receive strong protection when a new development is considered.

The proposed development by Obsidian to the north of the village, where spectacular long-distance views are available, was initially presented as for 10 acres (4 hectares) of housing with up to 60 dwellings on land presently owned by Brasenose College and this could represent a population increase of 240 residents.

A major concern is that if this initial build went ahead, it would set the precedent for the development of the much larger contiguous site of the same Brasenose owned field which has a total area of 27 acres (10.9 hectares). At the same housing density this could represent a total of more than 160 dwellings and an increase of an estimated 640 residents. However, if the density was more typical of that of new developments in the UK this could mean 240 dwellings and a population increase of 960 additional residents. This needs to be considered in terms of the population of Cropredy in 2019 that was 689. The potential in both cases is for a doubling of the present village population if the whole site is developed.

It is interesting to note that the size of the proposed site in the outline planning application has already increased in size to 12.25 acres (4.96 ha) since it was first promoted at a village exhibition in the church earlier in 2023 demonstrating that the inevitable development creep has already been initiated.

This larger development that would follow from the part development of the site would completely transform the character of the village and would overwhelm all available services and amenities and would turn Cropredy into a more urban suburb of Banbury. There is nothing to control the number of houses that could be built by the eventual builder once Obsidian have obtained permission for their outline plan that would have no similarity with the actual development that takes place and the full plan once it is submitted.

Carter Jonas Planning Statement April 2023

According to the planning statement from Carter Jonas as part of the outline planning application the land is classified as Grade 4 agricultural land, which is 'poor quality' as defined by the Agricultural Land Classification of England and Wales. However, this is in most part due to the spreading of clay on the field over the topsoil from the digging out of the Marina basin demonstrating clearly how what has already been allowed to happen to the field without proper control and monitoring of construction practices. The presence of the surface clay now means that the site now suffers from surface flooding.

In the planning statement the site is described as being close to the Village Hall (500 metres), the Post Office (500 metres), the Cropredy Primary School and Pre School (980 metres), the Parish Church of St Mary the Virgin (500metres), the Methodist Church (175 metres), the Bridge Store village shop, (805 metres), the Mulberry Café (400 metres), the Brasenose Arms Public House (500 metres), the Red Line Public House (350 metres), the Sports Pavilion (500 metres) and the Doctors Surgery (500 metres) although there is no safe access by foot to any of these village amenities and the walked distances quoted are inaccurate, most travel would have to be by car.

The Carter Jonas document also states that Banbury is identified alongside Bicester as a suitable focus for development in the Cherwell Local Plan however Cropredy is not Banbury for the purpose of planning housing developments.

The proposed development has no plan for the social housing that is needed in the village only affordable housing which in the type of scheme outlined does not remain affordable based as has been clearly demonstrated by the experience of earlier village housing developments like Kyetts Corner where almost all the affordable properties are now landlord owned and no longer affordable. The Office for National Statistics has confirmed this week that for the first time the majority of 20- to 24-year-olds in England and Wales are still living with their parents as “adult” children. Home ownership amongst the under 35s has almost halved since the 1980s due to the lack of suitable house building at the affordable level and the wholesale sell-off of social housing.

There is a clear case for more housebuilding in the UK but it must be targeted and must address these issues as these clear and growing problems will not be addressed in any way by the proposed outline development which in rural communities inevitably end up as for-bedroom executive homes that are more profitable for the developer rather than the low cost starter homes that are urgently needed. The endlessly promised new GP surgeries, schools and village halls served by imaginary bus routes that will be built alongside the new houses are rarely delivered.

There is nothing in the planning statement that offers the opportunity for lower energy bills by retrofitting existing village houses with green technology like solar panels or insulation and it is not clear that such technologies are being considered as part of the proposed development again demonstrating how far it is away from supporting either housing needs or the UK’s net zero requirements.

The footpaths mentioned in the planning statement do not connect directly to the village and hence would be of limited use to the wider community.

Although the site does not lie within a Conservation Area and there are no listed buildings present on the site it is directly adjacent to the Conservation Area that includes historic farm buildings dating back to the sixteenth century.

The development as outlined in the planning statement would not enhance the village environment. Satisfactory access and services cannot be provided, and it adversely affects the landscape particularly the views over open countryside. The site is not well located to facilities, necessary infrastructure cannot be provided, and it is likely to add to the existing flood risk.

The proposed new doctor’s surgery in the outline plan is not supported by the present practitioners who asked not to be included in the Obsidian site development plans. The proposed site is not suitable for the village surgery as there is no suitable pedestrian or safe access by transport other than by car. This is not a sustainable option, and a similar argument can be raised about the siting of other potential village amenities such as a village hall.

The Carter Jonas planning statement says that the proposed development will allow the surgery to replace their existing cramped facilities with a purpose built, modern medical centre with ample car parking although the practice asked that this should not be a consideration in the plan.

In developments of this type, the promised community spaces or facilities are frequently not properly completed by the eventual builder and the buildings are left unusable or to be completed at the expense of the local community. Such opinion sweeteners should not be taken seriously by the planning office.

A case in point is the marina development at the other end of the same field where none of promised landscaping and tree planting has taken place and the ownership of the marina has changed hands at least twice so there is no sustained responsibility to complete what was offered at the planning stage to gain support of the proposed plans. It is likely that they have cut down more trees than they have planted.

The development of land off the Claydon road in Cropredy is disproportionate to the size of the village and is outside the of the village boundary and will result in a significant loss of village character and local habitat for wildlife. There is a lack of public transport to support the increased number of residents so with potentially up to 180 more cars plus a significant increase of pressure on the school and the doctors' surgery.

No consideration is given as to how the planned Local Equipped Area of Play (LEAP) and a Local Area of Play (LAP) will be maintained or accessed by village residents and their children other than by car or access along a busy road with no footpath.

The Material Considerations of the National Planning Policy Framework mentioned in the Carter Jonas planning statement are of significant interest and deserve critical comment:

“Paragraph 85 of the NPPF states that the use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

Clearly the site in question has not been previously developed.

*“Section 8 of the NPPF relates to promoting **healthy and safe communities**. Paragraph 92 states planning policies and decisions should aim to achieve healthy, inclusive and safe places by promoting social interaction and designing safe and accessible places.”*

Clearly the proposed site is isolated from the village except by road this will not promote either social interaction or safe access except by car transport.

*“Section 9 of the NPPF relates to **sustainable transport**. Paragraph 104 requires appropriate opportunities to promote sustainable travel to be taken up in respect of the type of development proposed and its location.”*

The proposed site does not promote sustainable transport in any meaningful way.

*“Section 14 of the NPPF relates to the challenge of **climate change and flooding**. It encourages development to reduce greenhouse gas emissions, encourage the reuse of existing resources, and supply renewable and low carbon energy.”*

There is no commitment to sustainable building practices or heating in terms of the use of low carbon electricity generation or in any meaningful way to tackle climate change.

*“Section 15 of the NPPF relates to **conserving and enhancing the natural environment**. Paragraph 174 seeks to ensure impacts on biodiversity are minimised and net gains are provided. It also seeks to ensure development does not give rise to unacceptable levels of soil, air, water or noise pollution.”*

Clearly the proposed development does the opposite to conserving and enhancing the natural environment that it destroys.

*“Paragraph 16 relates to **conserving and enhancing the historic environment**. Paragraph 194 states that “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.” Paragraph 199 states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.””*

The development will directly degrade the heritage assets of the adjacent conservation area and the setting of the adjacent historic farmhouses.

“The NPPF (paragraph 74) requires local planning authorities to: “identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.” “

It is understood that Cherwell already exceeds these targets for the next five years and this is not just an academic point.

“The emerging planning policy for Cropredy, the Cherwell Local Plan 2040, is at the early stages of preparation and therefore only attracts very limited weight at this stage.”

This is a disingenuous statement and not consistent with the development of this plan which should in fact be strongly considered.

“Whereas previously, against the adopted local plan, the Council could only demonstrate a 3.5-year supply of housing for the period 2022-2027, against the Standard Method calculation the supply has increased to 5.4-years.”

This confirms that a development on the proposed scale is not necessary.

“As demonstrated by paragraph 2.11 above, Cropredy should be considered to be one of the most sustainable category A villages in the district in that it has a number of facilities that are within walking/ cycling distance of the site and it is in close proximity to Banbury, one of the main towns in Cherwell District. Banbury is accessible by bus (an hourly service can be reached in a 10-minute walk) and by cycling. There are therefore opportunities for the proposed development to encourage sustainable travel options as is required by Policies ESD1 and SLE4.”

There is no hourly bus service into Banbury and this type of obvious error with others brings doubt as to the accuracy of the rest of the documents provided.

“The site is greenfield and, as demonstrated, is poor quality agricultural land. Potential for contamination associated with the development of the marina and access road has been identified which will be subject to remediation work. Owing to agricultural practices on the site it is not of high environmental value. The existing trees and hedgerows are proposed to be retained and the development seeks to deliver environmental benefits on the site, including a recognisable biodiversity net gain.”

The poor quality of the agricultural land was caused by the marina development and its quality could be readily restored. The existing trees and hedges are those that remain after the marina

development that resulted in the damage and loss of mature trees and hedges with the concomitant reduction in wildlife. The proposed development would inevitably continue this desecration of habitat.

There will not be a significant adverse impact on heritage and wildlife owing to avoidance, mitigation and compensation measures discussed further below.

The Marina development has already had an adverse impact that can only be exacerbated by the proposed development.

The proposed development will be experienced in the context of the urban edge of Cropredy and will improve the interface with the existing settlement edge and the marina.

There is no interface with the marina to be improved and the interface with the village will be degraded by the screen of trees with no plan for their upkeep or maintenance.

It is considered that the proposed development will not result in unacceptable effects on landscape and visual receptors as the development preserves the characteristic attributes of the landscape, such as hedgerows and enclosed views and responds positively to the local setting of Cropredy. The accompanying Landscape and Visual Impact Assessment expands on this and is discussed further below.

It is not possible to make this consideration at the outline planning stage as no detailed plans have been submitted by the company that will build the housing that could have absolutely no relation with the outline plan.

Safe vehicular and pedestrian access can be provided from Claydon Road which connects to the surrounding road, cycle and pedestrian network. This is evidenced within the accompanying Transport Assessment. Furthermore, it is proposed to provide improvements to pedestrian routes into the village along Claydon Road.

There is no safe access to the proposed development as there is no footpath and walking along the road is dangerous due to the fast traffic. These problems are not properly addressed in the outline plan.

The site is within walking distance and cycling distance to services and facilities in Cropredy, including village shop, primary school, public houses and churches. Banbury also provides services and facilities in close proximity which is accessible by car and bus. There is currently a daily bus service available on Station Road, a 10-minute walk from the site.

There is no safe access to these services as has been discussed and inevitably all journeys will be to and from the site by car as is the case with co-located the marina development. The daily bus service has been dreamt up by Obsidian as it doesn't exist.

Necessary infrastructure can be secured through a Section 106 agreement.

A poor start has been made with the proposed surgery. The Section 106 agreement should be of much greater benefit to the village from such a transformational housing build that would so dramatically alter its size and character.

The site is within Flood Zone 1, the area with the lowest probability of flooding. Surface water will be managed through Sustainable Urban Drainage Systems and the development will not increase flood risk in the wider catchment area.

The marina development on the same site has already damaged the drainage of the field which now retains much more surface water than before. The SUDS in the outline plan may or may not be provided if the development goes ahead.

Conclusions of the Carter Jonas planning statement:

8.2 The development of up to 60 dwellings would significantly contribute to the supply of housing, including affordable housing, and any potential adverse effects can be satisfactorily mitigated through planning conditions and planning obligations.

As proposed the outline plan would not contribute to the actual UK housing need.

8.3 A planning policy review has been undertaken which concludes the proposed development is in accordance with the pertinent policies identified in the adopted Development Plan.

It is not clear that this is the case with either the present plan or more specifically with its proposed replacement.

8.4 The Parish Council and the Cropredy community are supportive of the development proposals in this sustainable location.

The Parish Council is neutral and will respond to reflect the view of the majority of the villagers on this and other development proposals. The Cropredy community has not been properly surveyed. Neither of these statements are accurate.

8.5 This Planning Statement and associated technical reports demonstrate that there will be a minor adverse impact, as a result of the proposed development, in relation to landscape and heritage. However, these impacts are clearly outweighed by the benefits of the scheme. The site provides much needed residential development including 35% affordable housing in a sustainable location. This will help to address the significant affordability issues as identified in the submitted Tetlow King Affordable Housing Report, including the 962 affordable housing unit shortfall. The development will provide numerous economic, social and environmental benefits, including providing a 10% net gain in biodiversity and the relocation (and expansion) of the doctors' surgery following their direct approach to the applicant in the context of this planning application.

There will be significant negative impact on the adjoining properties (at least 27 households). The scale of the development is not "much needed" in Cropredy where development should be by infilling rather than extension beyond village boundaries. The notion of affordable housing at the outline planning stage has no relevance to what would be built. The social and environmental benefits are extremely limited at best and more likely to be detrimental as with the marina development on the same site.

8.6 The proposal contributes to the three overarching objectives of sustainable development by contributing positively to the economic, social and environmental dimensions, through the benefits provided by the proposed development. These benefits include the provision of market housing and affordable housing to meet the identified need.

The proposed development does not represent sustainable development in any way and is not appropriate to the UK's housing or net zero requirements. It certainly does not support economic,

social or environmental dimensions based on the experience of the marina development that has brought none of these potential benefits but has increased road traffic, has not benefitted the village economy and has had negative environmental influence.

8.7 Owing to the delay in the progression of the Cherwell Local Plan Review, it is evident that the Development Plan will not significantly boost housing for some time and sustainable development at Category A villages, in locations that are acceptable in principle having regard to Policy Villages 2, will need to be granted planning permission in the short term. This proposal will help to ensure housing is delivered rather than relying on delivery from the new emerging Local Plan, followed by the grant of planning permission, to address the shortage in housing land in the District.

The wider district is over-run with large scale housing developments on the northern and southern edges of Banbury and with the major housing developments in both Brackley and Bicester and the recently proposed 1000 house development near Bloxham. This negates any need for a development of this scale beyond the Cropredy village boundary.

8.8 Therefore, considering the above, outline planning permission should be granted without delay.

Outline planning permission is a spurious requirement for the benefit of Obsidian only and has no relation to what would or could be built by a developer and should not under any circumstance be granted in view of the major inaccuracies, errors, holes, and omissions in the presented documents.

Yours sincerely,

Geoff Scamans