



Cherwell

DISTRICT COUNCIL
NORTH OXFORDSHIRE

Cherwell District Council

TOWN AND COUNTRY PLANNING ACT 1990

**APPEAL BY ARCHSTONE AMBROSDEN LTD, BELLWAY
HOMES LTD & ROSEMARY MAY**

LAND EAST OF PLOUGHLEY ROAD, AMBROSDEN, OX25 2AD

LOCAL PLANNING AUTHORITY REF NO: 22/02866/OUT

PLANNING INSPECTORATE REF NO: APP/C3105/W/23/3327213

Planning Supplementary Rebuttal Proof of Evidence

March 2024

1. I can confirm that Cherwell District Council will be legally challenging the Heyford Park Decision Letter (APP/C3105/W/23/3326761).
2. The Council's position is also that the Ambrosden Appeal scheme is distinct from the Heyford Park Appeal scheme.
 - Firstly, Ambrosden is a Category A village with significantly less facilities than Heyford Park (with more facilities to come through the Masterplan).
 - Secondly, Ambrosden is a village that has not been identified in the local plan as being suitable for the delivery of strategic scale development. By Contrast, Heyford Park, has its own Local Plan site allocation (Policy PV5: Former RAF Upper Heyford) which allocates 1,600 homes there (in addition to the 761 homes already permitted).
 - Thirdly, the landscape harm the Ambrosden Appeal scheme would bring is more severe than at Heyford Park and the harm would be permanent.
 - Finally, the case officer recommended the Ambrosden Appeal scheme be refused (nb: the Heyford Park appeal APP/C3105/W/23/3326761 was the result of Members overturning the case officer's recommendation for approval).

3. Notwithstanding the Council's intention to challenge the Heyford Park Decision Letter, I would like to draw your attention to paragraphs 28 and 29 in the Decision letter. These paragraphs, state:

"28. The AMR also shows that there is a current shortfall of 1392 dwellings over the District as a whole and this is anticipated to increase to 3,416 by the end of the Plan period. This is a significant deficit. The fundamental issue for Cherwell is that the strategic allocations in Bicester and Banbury and also Upper Heyford are not delivering as anticipated.

29. The figures in Policy BSC1 anticipate delivery of 2350 dwellings in the 'Rest of the District', excluding Banbury and Bicester. This figure derives from 1600 homes at Heyford Park and 750 from allocations under Policy PV2. The AMR shows that 1195 dwellings have been built and consented against the 750 figure of Policy PV2, that represents an excess of 445 dwellings. There is still of course 8 years of the plan left to go, so that delivery in the 'Rest of the District' is likely to exceed the plan requirement. Any shortfall at Heyford Park is likely therefore to be outweighed. In this context, further development in this part of the District, away from the identified sustainable locations for growth, could undermine the Plan's strategic distribution of housing."

4. Whilst the Council does not accept the conclusions of the Heyford Park decision letter (as a whole, including in relation to housing land supply and the requirement used to assess supply), para. 29 does support the Council's case that the scale and location of development should be delivered in a way which would not undermine the Council's spatial strategy.
5. Moreover, there is also no direct public transport journey from Ambrosden into the centre of Oxford. The public transportation options between Ambrosden and Oxford are structured in a way that the use of public transport connections encourages car-based trips.
6. Appendix E of the Appellants' Transport Assessment (set out below, for the ease of reference) depicts the Ambrosden's modal split. The table shows that 68.1% of journeys

from Ambrosden are car or van-based trips, 2.6% are train-based trips and 2.8% are bus trips. This equates to 5.4% public transport use for the village.

QS703EW - Method of Travel to Work (2001 specification)

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population All usual residents aged 16 to 74
 units Persons
 area type 2011 wards
 area name E05006518 : Ambrosden and Chesterton

Method of Travel to Work	2011			
All categories: Method of travel to work	2,774		1,946	
Work mainly at or from home	253	9.1%	0	0.0%
Underground, metro, light rail	2	0.1%	0	0.0%
Train	49	1.8%	51	2.6%
Bus, minibus or coach	55	2.0%	55	2.8%
Taxi	8	0.3%	8	0.4%
Motorcycle, scooter or mop	23	0.8%	23	1.2%
Driving a car or van	1,325	47.8%	1,325	68.1%
Passenger in a car or van	86	3.1%	86	4.4%
Bicycle	70	2.5%	70	3.6%
On foot	319	11.5%	319	16.4%
Other method of travel to work	9	0.3%	9	0.5%
Not in employment	575	20.7%	0	0.0%

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

7. The closest bus stop to the appeal site is on Willow Road, Ambrosden, which is approximately a 4-minute walk away. Two bus services operate from this bus stop: Bus service H5 and bus service 29. They run on an hourly basis.
8. Both of these services drop passengers off at Pioneer Square, Bicester, where the passengers will have the choice of:
 - taking the lengthy (34 -38 mins) X5 or S5 bus routes into Oxford City Centre (Gloucester Green Bus Station);
 - taking the X5 and S5 bus to Bicester Village Station (4 minutes); or
 - making the 15-minute walk down to Bicester Village Station to catch the train to Oxford train station, which takes between 17 minutes and 19 minutes. Oxford city centre is then a 14-minute walk from Oxford train station.
9. The combined bus journeys (H5 + either X5 or S5) from Ambrosden to Oxford City centre takes between 1hr and 1 minute and 1 hr and 5 minutes, whilst the combined bus, then bus and a train journey to Oxford train station (followed by a walk to the city centre) has a total journey length of approximately 47 minutes (assuming all the different modes' timetables correlate with one another) or 1 hr, if one walks from Pioneer Square to Bicester Village Station.

10. Either way, getting to the centre of Oxford by bus from Ambrosden is convoluted, timely, and results in taking between two and three different modes of public transport.
11. Finally, there is only one bus service from Ambrosden that goes to Oxford. That is the number H5 service and that takes people to the John Radcliffe Hospital, which is located on the eastern edge of Oxford, 2.7m from the city centre.
12. In short, this is not a location for strategic growth.