



# Land South of Green Lane, Chesterton: Rebuttal Proof of Evidence of Jeremy Smith BSc (Hons), DipLA, CMLI

**Appeal Reference: APP/C3105/W/23/3331122**

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### **DRAWINGS**

GLC-59	Overlay of Land Registry Plan on Landscape masterplan (1:1250 at A1)
GLC-60	Overlay of Land Registry boundary on Topographic Survey (1:1250 at A1)



## Introduction

- 1.1 This Rebuttal responds to a single issue raised in the Proof of Evidence of Mr Mark Topping, the landscape witness for Cherwell District Council. At paragraph 2.1.16 of his proof Mr Topping notes that there is an inconsistency in the red line boundaries between the landscape masterplan (CD1.14) and the site location plan (CD1.12). At paragraph 2.1.17 he states that if the site location plan drawing is correct “*then the existing vegetation would lie outside the red line and therefore the maintenance and management of this is assumed to be outside the control or ownership of the Appellant...*”.
- 1.2 All other points raised by Mr Topping in his Proof are either already addressed in my evidence, or can be dealt with at the inquiry.

## Clarification of the Red Line Boundary for the Appeal Site

- 1.3 I have prepared two new plans to help the Inspector on this issue. **Drawing GLC-59** provides an overlay of the land registry plan boundary (in light green) on the landscape masterplan (CD1.14). The landscape masterplan is a hand drawn plan, and as a result there is a discrepancy between these boundaries.
- 1.4 The site location plan (CD1.12) is a computer-drafted drawing, and matches the land registry plan boundary exactly.
- 1.5 Drawing **GLC-60** provides an overlay of the land registry boundary (this time in red) on the topographic survey for the appeal site, which includes the accurate position of hedgerows and trees around the edges of the site. **GLC-60** thus provides an accurate illustration of not only where the red line boundary is, but also how this boundary relates to the existing vegetation around the edges of the appeal site.
- 1.6 It is clear from **GLC-60** that the red line runs within the width of the existing hedgerows which bound the appeal site. There are, however, some shrubs and trees that grow outside of the red line both on Green Lane and along the unnamed lane to the west of the appeal site.

## Conclusions

- 1.7 Whilst it is true that some of the existing vegetation along Green Lane and the unnamed lane to the west of the appeal site is outside of the site boundary, there is no reason for any of this to be removed, (with the exception of for the proposed site access), particularly since the new footway along the southern edge of Green Lane has already been constructed.



- 1.8 Furthermore, it is clear that some of the vegetation along the site boundaries lies within the appeal site. As a result, it would be possible for the appellant to manage those parts of the hedgerows and trees that are within the boundary, and to provide further tree and shrub planting to gap up and thicken the hedgerows within the boundary.
- 1.9 The photomontages in my Appendices, and the visual appraisal within my Proof and Appendices, were all drafted on this basis. Consequently, it is not necessary to make any changes to my evidence as a result of Mr Topping's concerns regarding the red line boundary for the appeal site.





SPORTS

HOUSING AT VESPASIAN WAY

Cricket Ground  
PLAYING FIELDS  
Recreation Ground

Sports Pavilion

Potential for sports pitches

Mown paths connections

Potential for Neighbourhood Area of Play off facilities for old

Potential for community orchards and mosaic scrub

Wildflower meadows with mown paths

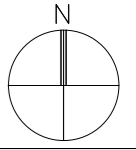
ARABLE LAND

Attenuation basins improved for wildlife and amenity benefit. Seating to south facing banks

Potential for picnic areas and informal kick-about

Mosaic scrub woodland

GLC-59



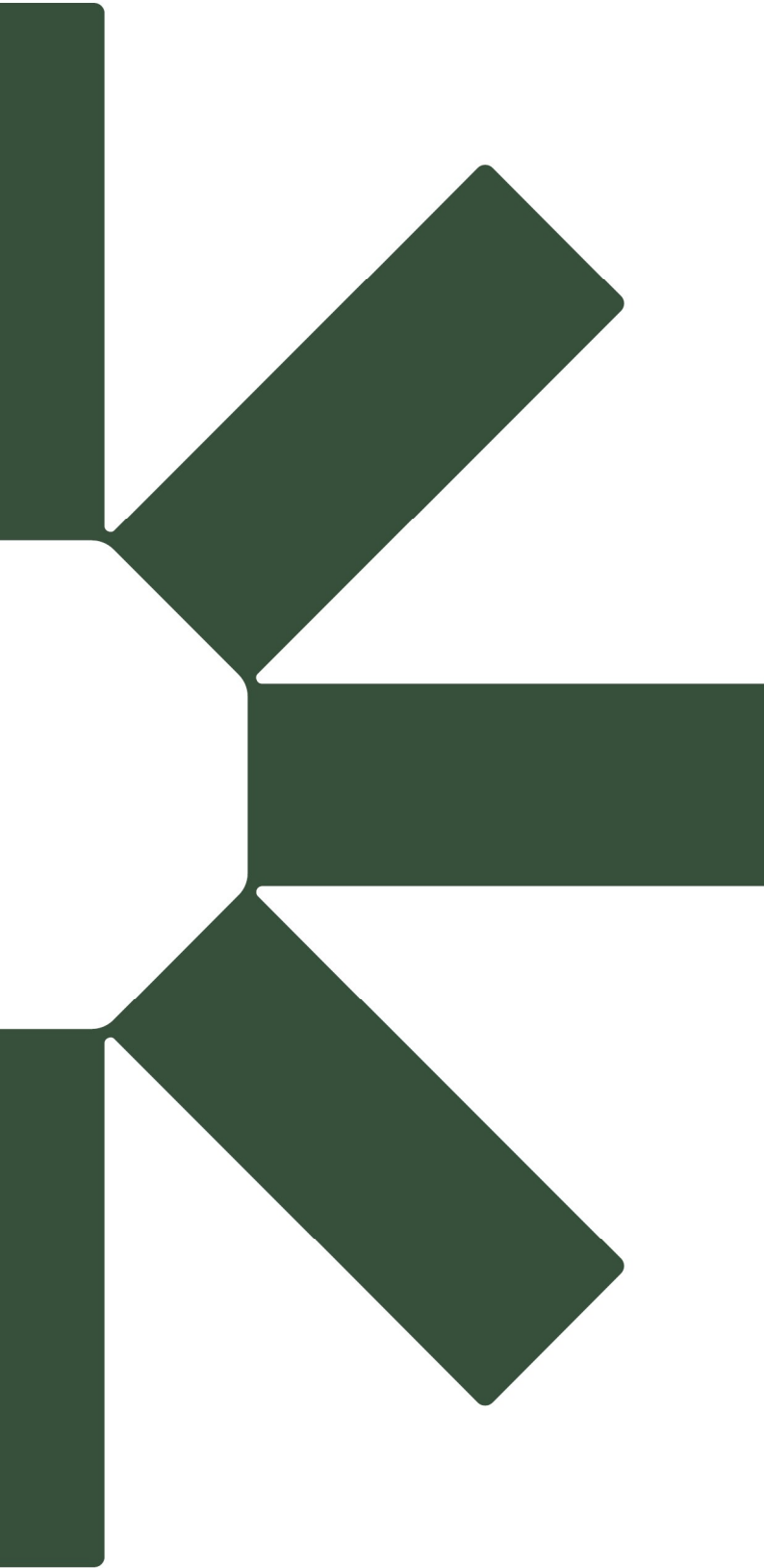
**GLC-60**

Land off Green Lane, Bicester  
Land Registry ON195777 & Highways on CD Surveys topo

Scale 1:1250@ A1  
Sep 2022

 ON195777

 Land maintained by Highway Authority



Making Sustainability Happen