

Applewood
Middle Aston
OX25 5PY
28th May 2020

James Kirkham
Cherwell District Council
Planning and Development
Bodicote House
Bodicote
Banbury
OX15 4AA

Ref: Proposed Hatch End Business Unit Development – Application No. 20/01127/F

Dear Mr. Kirkham,

We have spent a lot of time looking through the above planning proposal, and strongly object to it. The proposal as it stands is far too big, but in principle we would object to any such development of the existing site. Our objections and reasons are laid out below, and we have included at the end of this letter a few key facts and points that we picked out from the various planning documents, which we found useful in forming our opinion and response.

We oppose the proposed development of the Hatch End site. It would change the fundamental character of the Middle Aston and Steeple Aston villages and their locality. The location is not suitable and we believe the employment opportunities it may provide will largely be for people from outside those villages. Although the site meets some of the Council's requirements for development, particularly that of being a redevelopment of an existing site, in our view this is not the place for a larger (in terms of number of employees), busier business park, and if the chicken sheds were not already there nobody would think of putting a business park there. While technically the redevelopment may not constitute a "change of use" of the site, in practice it very clearly does, as the nature and number of businesses will change considerably. The "comparable" sites that have been used in the Traffic Statement all lie in or on the outskirts of much larger towns and cities, and importantly right next to major roads – none is in such a rural setting with such minor and fragile roads for access as that proposed here. This in itself suggests that more urban locations are more suitable for this kind of business park. In addition, the proposed units are much larger and more industrial than the existing buildings, and would change completely the rural nature of the local area. We would add a further consideration, which is that a larger business park would attract more attention from burglars who otherwise would not have been aware of the location.

We believe that the increase in traffic will be considerably bigger than estimated in the documentation contained in the planning application, and that the parking provision is insufficient for the units that are proposed. All the extra traffic generated will pass through residential areas, on narrow streets and roads, whichever route is taken. We doubt the claim that the increase in traffic will be negligible (Transport Statement - Paragraph 8.1.1), and have included some more detailed comments below on why we think this. We are also concerned that cars and vans are combined in the traffic data, when in reality the difference between a normal car and a modern Transit van is big, and the two should not be treated as equivalent to each other. Any increase in traffic to the proposed business park is likely to include a higher than normal proportion of vans.

Any increase in traffic will inevitably increase the risk to pedestrians, cyclists, and other road users on the road between Middle Aston and Steeple Aston, which is already too high due to the lack of a pavement in both directions. This risk is further increased when the extra traffic is not locally-based, which it will not be on the whole. We already see that some delivery drivers and visitors to Middle Aston House drive too fast and do not drive with the same care and attention that more local drivers usually do. There is a particular

risk at the entrance/exit of our drive, which is a blind corner for vehicles coming through Middle Aston. There are other places where visibility for traffic is poor, notably at the top of the rise between Middle Aston and the Hatch End site (Steeple Aston end), which is a notoriously dangerous spot.

The school rush, particularly in the morning, around 8:30-9:00am, is a big concern, with many parked cars and parents/children on the road (there is no pavement where most people park), just when people will be arriving for work at the proposed business park. There have been dangerous near-misses there already, which were reported to the school and we believe the council at the time.

The bus and train services are not frequent enough to allow potential employees at the proposed site the necessary flexibility to use them regularly. Apart from the Oxford-Deddington-Banbury service, the quoted bus services run once or twice per day. The train service at Lower Heyford offers trains around every two hours. It is 2.5km from the site, which is a 31 minute walk (both figures from Google Maps). This is more than most people would be prepared to undertake at the beginning and end of the working day.

Construction traffic, while limited in duration, will constitute a dangerous increase in traffic. There were significant issues with construction traffic to a much smaller site on Fir Lane recently (extension of a single residential property). The traffic for the proposed development at Hatch End would be many times greater than that and would last for the best part of a year, according to the proposed development schedule. We note in passing that the "Not Suitable for HGV" sign for the road from the A4260 towards Middle Aston is after you leave the main road, so any HGV driver not familiar with the road will already have made the turn before seeing the sign. Although the proposed scheme for construction traffic uses routes through Steeple Aston, after the construction phase any increase in traffic that comes from the North (from the Banbury direction) will inevitably leave the A4260 at the end of the dual carriageway and pass through Middle Aston. The roads around the site and through the villages are already in a poor state of repair, and any increase in traffic, either construction traffic or regular business traffic to the site, will accelerate their rate of deterioration.

Traffic Increases

Although there is much talk in the documentation about initiatives and encouragement for employees to use other means of transport to get to the site, there is nothing mandatory, and even the lowest estimate in the planning documentation suggests that more than 75% of employees will use this method of transport, even in the long term (Framework Travel Plan Paragraph 5.2). Government statistics show that every year from 2002-2018 the figure for single-occupancy journeys for commuting and business travel in cars and vans has always been in the range 84-88% (<https://www.gov.uk/government/statistical-data-sets/nts09-vehicle-mileage-and-occupancy>).

The Framework Travel Plan and Transport Statement do not appear to be unbiased documents. In particular the Transport Statement, Paragraph 1.2.2, explicitly states that "the Transport Statement seeks to confirm" that (among other things) "net traffic generation will not have an adverse impact on highway safety or capacity", which is hardly an independent starting point.

The estimates of the traffic increase due to the redevelopment are based on: -

- i. A survey that counted traffic entering and leaving the site;
- ii. A traffic measurement on Fir Lane, measured separately to the North and South of the site;
- iii. Estimates of the traffic that will visit the site based on selected representative sites of a similar nature.

Despite spending quite some time delving into the details of the traffic estimates, we find it hard to follow exactly how the final numbers have been generated. There is one obvious point that we would take issue with, which is that the numbers from the survey of the traffic entering and leaving the site at present ((i) above) have been more than doubled (actually increased by a factor of 2.129 – Transport Statement Paragraph 4.2.3, Table 4.1), to account for the fact that not all of the existing buildings are occupied. But that is the point – they are not occupied, nor are they likely to be, so to start by assuming that existing

traffic is more than double what it actually is, is cheating in our view. The measurements of traffic currently passing along Fir Lane ((ii) above) appear to have been generated by a proper measurement, but the estimates of traffic that will use the site, based on other similar sites ((iii) above), are very hard to follow and we wonder what other smoke and mirrors have been used to generate the final predictions. I note that the list of "comparable" sites includes Cambridge Science Park (142,000m²; 5,000 employees) and Portsmouth Business Park (55,000m²; 2,800 employees) – hardly comparable to the Hatch End proposal. Also, as we mentioned above, all of the "comparable" sites are in or on the outskirts of much larger towns and cities, and are not suitable for comparison with the proposed Hatch End site. Indeed, if these comparable sites are the closest that could be found to the proposed development then that is an indication that it is not a normal setting for such a business park.

Parking Provision

97 parking spaces are proposed, of which five will be disabled spaces. There will be 30 business units, with a total floor area of 3,170m². A commonly-used rule of thumb for the use of office space is one person per 10m². If all of the units were filled with office users that would give 317 people, which is probably a high estimate, but even if it were half that, which is possible, there would not be enough parking spaces. In addition to the employees, some businesses may have regular and frequent visitors and deliveries, which would all require parking spaces. If parking spills over on to Fir Lane it would be a considerable problem, as it already is near the school at the beginning and end of the school day. For the selected comparable sites used in the Transport Statement, the average number of parking spaces is 41 per 1000m², which is equivalent to 130 spaces for the Hatch End site, far more than the proposed 97. This all suggests that the number of employees and therefore the amount of traffic generated by the proposed development will be much more than has been estimated.

Notes from the Pre-Application

Appendix B of the Transport Statement contains the Pre-Application Report for the proposed development. There are a few statements from your report (quoted below) that show you share our concerns. These are comments from the pre-application, and we do not know what changes the developer may have made between the pre-application and the final application. However, most of these points are fundamental to the proposed development, and no amount of revision of the plans will change them. They far outweigh any of its positive aspects, of which we can see very few.

- "Policy ESD13 states proposals will not be permitted if they would cause undue visual intrusion into the open countryside, be inconsistent with local landscape character or harm the setting of listed buildings". Any modern industrial development will be inconsistent with the local landscape character.
- "The site currently contributes to the rural setting of the Conservation Area and the villages and the Conservation Area Appraisal notes that the Peripheral Areas' Character Area is closest to the site"
- On the height and mass of the proposed buildings... "In my view this would have a harmful urbanising impact on the character and appearance of the site and locality contrary to local and national planning policy in this respect."
- "In my view any redevelopment of the site needs to maintain the low key character and impact of the existing site and not lead to a significant urbanisation of the site as this would not only be harmful to the setting of the Conservation Area, general character and appearance of the area, but is also likely to raise concerns with Saved Policy C15 which seeks to prevent coalescence of settlements given that the site forms part of the gap of between Steeple Aston and Middle Aston. For the reasons outlined above the proposal would fail to do that."
- On traffic ... "Having reviewed the planning site history it is clear that the impact of the development on the surrounding road network will be a key consideration", and "Saved Policy TR7 states that development that would attract large commercial vehicles or large number of cars onto unsuitable minor roads will not normally be permitted and Saved Policy TR10 has a similar trust in

regards to HGV movements". While the developer may have good intentions as to the amount and type of traffic that visits the site, there are no guarantees of how this will turn out.

- From the conclusions... "However, I do have significant concerns over the impact of the scale of the development you propose in your submission on the character and appearance of the area, setting of the village and setting of the Conservation Area"

Various Notes from the Planning Documentation

General

- There are currently 15 full-time employees at the chicken sheds.
- New development will be 3170m², split into 30 units.
- 97 parking places planned, of which 5 will be disabled spaces.
- 48 cycle parking spaces.

Framework Travel Plan

3.2.1 and 3.2.2 Encourages cycling, walking, bus, train, but it is all initiatives, encouragement etc. There is nothing mandatory (there can't be). Most people will drive.

3.2.3 Footway to the South (towards Steeple Aston) provision starts 310m to the South (at the school). There is none to the North (towards Middle Aston). It is 460m from the site to Middle Aston House.

4.2 Travel Objectives. This section outlines the transport principles for the site. They are all very noble but will quickly be forgotten.

4.3 Especially "Wider Community Benefits"

- Ongoing reductions in vehicular generated traffic on the local highway network. I think they are referring to the suggestion that, as time goes by, more employees will switch to sustainable methods of transport. This in no way represents a reduction in vehicular traffic – there will always be more traffic than there is now.
- Increasing patronage on existing public transport modes. Maybe, but unlikely, as services are not sufficient for most potential employees.
- Health benefits with walking and cycling. We suggest this will be a negligible effect.
- A contribution towards overall reduction in travel emissions. As mentioned above, there will only ever be more traffic than there is now, so there will not be a reduction in emissions.

5.2 Estimate in the long term that more than 75% of employees will travel to the site in single-occupancy vehicles. Government statistics put this figure around 86%, every year for the last 16.

Transport Statement

1.2.1 Notes that the increase in area is "only 873m²", but the primary planning application states that there are currently 15 full-time employees. There will be 30 new units, so although the increase in floor area may not be enormous (38% bigger), we can expect many more people to be working there.

4.2.2 Factor of 2.129 applied to traffic survey because the current buildings do not have full occupancy.

4.2.3 Table 4.1. Table uses data with the 2.129 factor applied, so more than double the traffic that was actually counted.

4.3.2 Sample data (from TRICS database) compared the proposed site other business parks that meet the criteria - "suburban area, edge of town, community area". The "comparable" sites include Cambridge Science Park (5000 employees), Portsmouth Business Park (2800 employees), Stafford Business Park (1082 employees). Others in the list are of a more relevant size, but their locations are all in or near much larger towns and cities, if anything demonstrating that those are more appropriate locations for this type of development.

6.2.1 claims that one parking space per 30m² is OCC Optimum Standard, but the PreApp reply from OCC seems to suggest that 99 is a minimum figure and 166 is a maximum. Average number of spaces for a site of this size, taken over the nine example sites, is 130

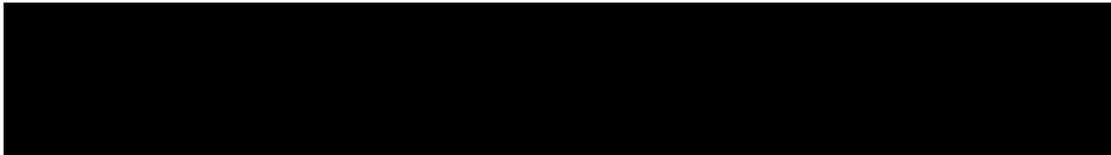
6.2.4 Fig 6.1 Parking accumulation predicts maximum of 62 spaces taken by employees during the day.

7.3.2 No change in HGV activity. There is none now

Appendix B. Council recommended parking provisions. It's hard to know which of the various numbers to pluck out the council's document, but the maximum number of parking spaces seems to be 165.

Appendix C. Measured traffic was 511 cars per day South of the site, 472 per day north of the site.

Yours sincerely,



Ciaron and Janne Pilbeam