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9th November 2020

RE App No: 20/02446/F

Objection to proposed inland marina at Glebe Farm, Boddington Road, Claydon.

Foreword

The Applicant (WA Adams Partnership) has a farming business which is to be significantly impacted on adversely by the HS2 development, from the loss of some of their land. It amounts to 118 acres in total, but renders approximately 140 acres as non-viable farming land (see Planning Statement (PS), para 7.13). This purportedly [more on this subject in para 2.2 below] forms a fundamental reason for the Applicant's desire to diversify their business in a direction away from farming. The Applicant has my genuine sympathy in this regard. However, before I proceed with discussing reasons for my objection to the proposed marina, to be situated on a portion of the Applicant's remaining agricultural land, I will indulge in a brief digression in reproach of the decision makers behind the HS2 development. Damage to essential agricultural industry in this locality, and elsewhere en route, from HS2 will be irrevocable. The cost will be borne largely by those farmers affected and, to some extent, indirectly by the nation as a consequence of the diminishment of produce made available to the UK's food market. It is more critical now than ever before that our Government, through its relevant agencies, provides farmers, essential workers, support and further inducements towards embracing environmentally friendly farming practices in the production of good healthy food for our nation. Healthy food is not a societal luxury but a necessity that we can ill-afford to sacrifice at all. The HS2 is over budget, unjustified in finding a genuine relevance for the present or future; and in its destructive nature, it is entirely counter-productive towards inspiring hope for an improvement in the lives of Britons and UK residents alike. HS2 is justice derailed.

Although this planning application is for me and numerous others, no doubt, a wearisome repetition of the Applicant's previous amended planning proposal (formally App no: 18/00904/F) a single positive thought to take from its resurrection is that the people comprising WA Adams Partnership are well in this Covid-19 stricken world. Pre-Covid and throughout the fifteen month period of the first planning application – and its amendment – between the parishioners of Claydon and other respondents, approximately 140 letters of objection were submitted. I submitted several correspondence and I will refer to them and quote from one further on. Due to current mandatory restrictions in public gatherings, because of the pandemic and various other related obstacles, the volume of correspondence submitted this time round will likely be significantly less than before. Nonetheless, all previous cogent arguments should remain valid in this planning proposal because they remain, I am confident, the sentiments held by their authors. Although each application must be judged upon its own merit, the Committee would be remiss to not take reasonable steps in consideration of the former extent of opposition raised by the public and various statutory consultees in regard to this nearly identical current application. If that cannot be committed, I recommend that Cherwell District Council (from hereon CDC) consider extending this public consultation period to allow for access to a better informed public debate.

1 Introduction

1.1 Past words

Due to this planning application being essentially a re-submission of the amended planning application (18/00904/F), I am re-submitting two out of several items of my previous correspondence responding to that former application – the contents of which, I believe remain pertinent. The letter dated 15.03.2019 is marked **Attachment A** and the letter dated 13.09.2019 is marked **Attachment B** and they are appended to this item of correspondence. Any relevant amendments to either Attachment A or B are annotated by hand thereon accordingly.

2.2 Menu

Due to various constraints of time, I have limited myself to a careful reading of the current Planning Statement (PS), Follow-up report–Revision 3 26.07.2019, Hydraulic Modelling Report (including the final EA letter,

Ref: WA/2018/125260/03–LO1), a letter supplied by Canal and River Trust (from hereon CRT) dated 29.10.2020, Ref: CRTR–PLAN–2020–30810, and I have looked at the Proposed Site Plan, No. A05/020. My comments are therefore concerning the above listed documents and do not presume to be comprehensive in their scope. My discussions are covered under two main heads: **Tourism** and **Environment**.

2 Tourism

2.1 A condition of planning

The Applicant regards that the proposed marina at Claydon would provide “an important recreational facility...” for the Oxford Canal (PS 7.110). In my correspondence dated 08.07.2018, under subheading *Canal Impact*, paragraph 2.2, I proposed:

Considerations fundamental to a successful planning application for Claydon Marina should include satisfaction of, but not be limited to, the following points below.

- (i) *There must be production of substantive evidence that there is existing need for a marina at this proposed site. This should not merely represent a conjectural interest in its commercial viability. It will take into account availability of permanent mooring spaces at existing marinas and CRT operated permanent stay online moorings in the wider context of the Oxford canal and the neighbouring Grand Union canal.*
- (ii) *It will require the undertaking of an impact assessment for the Oxford canal with the aim of examining foreseeable consequences in that introduction of a further 250 [now 192] boats onto the summit pound of the Oxford canal. This should include:*
 - *Realistic projections over the increased burden for Canal & River Trust in terms of maintenance and efficient operations of the canal infrastructure (for example, damage and incidental wear and tear to locks, and water management, etc).*
 - *A detailed report of the presently available online mooring spaces which are commonly used by boat owners/ hirers whilst on their journeys; whilst identifying other suitable online mooring sites that may yet be provided to make up for any expected deficit — both north and south of this proposed marina site.*
 - *An analysis of expected delays (particularly during the peak season) at the lock flights, both immediately at Claydon (comprising five locks) and at the opposite end of the summit pound at Marston Doles (comprising two locks) which directly lead to the Napton flight (comprising seven locks). It will consider that possibility of detrimental impact on business operations (hire fleets etc) and other factors of enjoyment concerning the leisure boating sector.*

CRT has stated in regard to evaluating the need or demand for new marinas that the onus falls upon the developer / applicant to determine that for themselves and that, “It is for the developer / applicant to deal with these matters if they consider it appropriate or if they are required to do so as part of their planning submission” [emphasis my own] (CRT’s letter, 29.10.2020, ref: CRTR–PLAN–2020–30810).

If there is not a genuine demand for another marina on the Oxford Canal then construction of another would overburden the canal with excessive traffic use and adversely impact on existing hire boat operators located within cruising range of the southern Oxford Canal; and it would also negatively impact on local boating communities situated along the extent of the Oxford Canal. There are many established marinas situated within a two day cruise from Claydon, many of which also have large numbers of vacant moorings. Cropredy Marina (now under the proprietorship of Castle Marinas Ltd) is currently expanding its development from 249 berths to 349 berths. It would therefore be prudent to assess what, if any, impact occurs from that expansion before granting permission to increase marina capacity by 54.45% in the area. I recommend:

- (a) that an assessment period of 12 months minimally, to commence upon completion and opening date of the newly constructed 100 berth section of Cropredy Marina, be used to measure levels of impact caused from increases in canal boat traffic upon the Oxford Canal; and
- (b) that subsequent to satisfaction of condition (a) above, this condition also be imposed by CDC on the Applicant: to undertake an **Oxford Canal Impact Assessment**, corresponding closely with the model proposed above, in supplement to this or a new or an amended planning application.

2.2 Alternative plans?

The Applicant opines that, “*This area of Oxfordshire will be badly affected by HS2 which is likely to have a negative impact on tourism and recreation. A positive development such as the marina will help to offset the negative impact caused by the railway*” (PS para 6.1, bullet point one).

I do not believe that if HS2 adversely impacts on tourism the Applicant’s wonky edged marina would redeem Oxfordshire in serving as a popular landmark and tourist destination (from plan view the marina looks like something splatted on the ground). However, in the PS, paragraphs 7.25 - 7.28, the Applicant considers

three alternative options available to them as potential business opportunities, which they say is predominantly necessitated by their loss of land from the HS2 development; and which are as follows: (1) realign their farming production to be non-dependent on subsidies; (2) utilise property assets for other purposes; and (3) expand their current farming operations by acquiring more land. Agricultural land near to the Applicant's farm is currently unavailable, dispensing with their third option. The first and second options are represented in the marina and lake proposal discussed thereafter.

I do not think the Applicant has given adequate consideration to alternative possibilities. Small parcels of land of five acres or less, created by the HS2 bisecting larger fields in the Applicant's ownership, cease to be viable farming land for their purposes (PS paras 7.14 and 7.15). It could, however, perhaps provide a variety of pleasant nooks and niche spaces for camping or self-catering, if tourism is really an eminent interest of the Applicant's. The Applicant, in referring to a document entitled "*The Economic Impact of Tourism on Oxfordshire – 2017*," relates that "3 % of all domestic overnight trips involved staying on a boat mooring... It is only one percentage point below camping and self catering..." (PS para 7.87). One of the partners (Mike Goode) in WA Adams Partnership [the Applicant] owns two marinas already, Debdale Wharf and North Kilworth Marina. Therefore I suspect that concerns over personal poverty arising from a reduced output in the farming business serves as a lesser imperative for the construction of a marina than simply the want from that aforementioned partner in the partnership, to expand his marina empire. However, as opined by the Applicant, the HS2 may adversely impact on tourism thereby making alternative business ventures a far more promising prospect.

3 Environment

3.1 Green: ready, steady, grow

The land forming the proposed site for Claydon Marina serves a public benefit in its continued use as agricultural land. The Government's recent proposal to scrap current planning laws (established post Second World War to protect the countryside nationwide), in favour of three new classifications designating all land use, has been met with widespread disapprobation in parliament or so I believe and hope. Nonetheless, *growth*, ironically refers to developments in construction of houses and associated urban infrastructure, not developments equivalent in size to Claydon village and purely for recreational purposes like the marina. (Of course, that disregards a potential development of 3 - 6 jobs which could be created off the back of this proposed marina and that would go some way towards reducing numbers forecasted by various leading economists with their suggestions of unemployment rising to approximately four million people in 2021. That said, regarding the state of economic affairs worldwide, an economist's guess is as good as anyone else's.) We need to ensure that there are sufficient means to feed our expanding nation without an over reliance on imported foods or an increased reliance on other nations providing us the vegetable patch we have just happily concreted over. With climate change now on the forefront of our minds, we should learn to better manage the plentiful supply of water that comes from above in order to improve our productivity, rather than watch it wreak havoc with peoples' property and lives. Compliance with **paragraph 196 of the National Planning Policy Framework (NPPF)** requires that a public benefit factor in a proposed development outweighs any potential harm derived from it. When appraised on simple terms, on the basis of likelihood that a product entering the food chain will benefit greater numbers of people, all-told, than the income garnered from a marina which mainly benefits those partners within WA Adams Partnership, the bias, I believe, favours the eaters. I would not oppose the construction of an irrigation lake alone.

3.2 Lake or puddle?

The proposed lake, constructed so that the spoil may be used for bund material containing the marina, is purported to be primarily for irrigating crops of potatoes; secondarily, for educational pond dipping; and possibly also providing a venue for a kayak club (PS paras 7.118 and 7.232). It certainly cannot serve all three propositions and quite frankly, probably none to proper satisfaction of their asserted purpose. The lake is to "*be fed by ground water and surface water from the surrounding field*," now considerably less a field obviously (PS para 7.242). This poses the question of how to prevent the lake from drying out and becoming stagnant during sustained periods of drought, when presumably crops of potatoes require water most. A promise from the Applicant not to ever drain the lake, with purpose of protecting the lake's ecology, would limit usage of the water for its irrigation purpose and thereby possibly damage crops. Also, a stagnant pond possesses little charm for pond dipping for the little ones coming from neighbouring schools. (It should be noted that with a projected volume of 54,000m³ of water contained in the lake (PS para 7.244) it will be subject to approval from a Panel Engineer in accordance with the **Reservoirs Act 1975**, as will, of course, the marina basin itself – should planning be approved.)

3.3 A point of view

The Applicant claims that the presence of the marina would not cause "*significant effect on the views, with most views being unaffected or the change being negligible or minor. The principal change occurs for road users... There would also be a prominent change for towpath and canal boat users at the canal entrance... The additional proposed planting to buffer the existing hedgerow will effectively prevent views of the proposed marina from the canal-side towpath*" (PS para 7.137). If the marina was esteemed to enhance the appearance

and character of the Oxford Canal and neighbouring village, such concerns over hiding its existence would not feature as important. The fact that such measures to create a screen from public view is deemed so necessary highlights the incongruity of this development in its proposed setting, as if, dare I say it, to hide a dirty secret. Anyone taking a journey by foot or car around the nearby countryside or within a few miles of the proposed site, would, I believe, upon discovering the marina development en route regard it as a massive development and starkly in contrast with the surrounding rural landscape of rolling pastoral and arable land. "Landscape" is defined by the **Guidelines for Landscape and Visual Impact Assessment (GLVIA)** in conformity with the **European Landscape Convention (Florence: Council of Europe 2000)** as, "an area, as perceived by people whose character is the result of action and interaction of natural and / or human factors..." A genuinely desirable feature in any landscape that is purposed by man receives a prominent position for its viewing. For the Applicant, the hiding of the marina, as far as possible, serves a mitigating point and in doing so it suggests itself as an interloper within its rural setting. Walkers along the Boddington Road, of which there are many, and walkers joining Boddington Road from the formal access point to and from the Oxford Canal at Hay Bridge (Bridge 143) would be stunned not awed.

3.4 Badger off!

The proposed marina site plays host to a wide variety of wildlife, badgers amongst them. Badgers are a legally protected species, which I am sure they are grateful for. The Applicant observes: "*Although evidence of badgers was found adjacent to the site and the site currently provides some opportunities for foraging, the sett is far enough away from the proposed works that it will not be directly affected, and it is highly unlikely that any resident animals will be disturbed. The additional landscaping and planting around the marina are likely to enhance the habitat for foraging badgers.*" (PS para 7.169.)

"*The development itself however is likely to enhance the area by the introduction of two new areas of standing water which will provide good foraging opportunities.*" (PS para 7.172.)

"*The ecologists have recommended a management plan is put in place, including proposals for lighting to ensure that the potential foraging and commuting routes around the site remain either unlit or with low level lighting only.*" (PS para 7.172.)

There are five subjects of concern I can raise regarding the welfare and habitat of badgers and other species, as follows.

- (1) The area of foraging habitat lost equals that of the development site which extends to two colossal water features and domestication of the remaining grounds within the marina's perimeter. Badgers are unlikely to be welcome in areas where moorers and their dogs, cars and utilities are situated (furthermore, badgers must not serve as speed humps if found to persistently stray into former territories).
- (2) An industrial scale development such as the proposed marina would significantly disturb all resident animals within the existing boundaries of the field and close locality; to assume otherwise signifies the Applicant's indifference to the relationship that all wild animals have within their territories. Humans construct walls; badgers, setts.
- (3) The embankment (dam) for the marina, if not carefully maintained could provide an ideal location to establish new setts and thereby compromise the integrity of that embankment. Vast quantities of water on the Oxford's summit could be lost over a protracted period through undetected seepage or worse still, rapidly in a full breach.
- (4) Badgers, although of the otter and weasel family, are not renowned for being keen swimmers and in such an environment as this proposed development they are more likely themselves to become the items of foraging if found floating on the surface of either or both constructed water features.
- (5) All natural predators rely on an initial element of surprise in the hunt of their prey to maximise their success rate, which would be increasingly difficult to achieve with the introduction of any lighting in or around the hunting grounds. [A question for the Applicant: Other than in black holes, cosmological events rather than terrestrial i.e. badger setts, how could light that is introduced to a dark place not create light pollution there? Light waves and particles radiate outwards from source as far as prevailing atmospheric conditions permit or until reflected off hard surfaces, such as cars, boats and bodies of water. That would create an amplitude of light and potentially cause glare. Any lighting installation would be too near to the adjacent wildlife site parallel with the disused railway line, where there are nocturnal animals as is evident from the active badger setts.]

3.5 Pump-action faecal matter

- (1) In the letter from the Environment Agency (EA) dated 12.09.2019 (ref: WA/2018/125260/03-L01), an objection to the proposed marina was maintained on the basis of an inadequate **Flood Risk Assessment (FRA)** submission. A determination over whether satisfaction of the requisite standards as provided in **paragraph 196** of the **NPPF, CDC's Local Plan Policy ESD6 – Sustainable Flood Risk Management** – is for the EA to make. However, the objection regarding *foul drainage and water quality* was withdrawn by the EA provisionally on the assumed basis of sewage from boats being "*usually pumped out to an underground holding tank where it will be periodically emptied via a licenced waste disposal firm,*" [emphasis my own] which they quoted from the Applicant's FRA at paragraph 6.25. The EA's withdrawal of that objection is

contingent upon that premise: "*If this is the case and the boat users at the marina are not going to be using the private sewage treatment system then...*" [emphasis my own]. Nonetheless, the EA advises, "*Please be aware that the permit may not be granted.*" [The permit is the EA licence to discharge treated sewage into the adjacent watercourse, now identified as the Wormleighton Brook instead of the Highfurlong Brook.] Further conditions for the Applicant to meet in respect of the EA's possible assent to issue a permit requires a clarification on which specific treatment system is intended to be installed and evidence in support of an increase in its usage capability exceeding the 48 people which were accounted for in Appendix M of the FRA. "*Calculations must be undertaken for 50% and 75% usage of the facilities,*" requests the EA.

- (2) As was the case in the previous planning application [18/00904/F], there are two Elsan disposal points to be provided at the marina and which are located at the opposing end of the site to the clubhouse. Every overnight stay on a boat would usually result in a visit to the toilet on a boat and the boats would amass a tremendous volume of effluent, more so than in the clubhouse, and it is usually treated with a formaldehyde product to combat the otherwise malodorous properties of effluent. I have neither located plans nor found discourse on the subject of holding tanks at the Elsan sites, which would have to be sunk into the embankment of the marina basin. Nor have I seen evidence for a holding tank to be situated at or near to the facilities bay, where boaters with in-built holding tanks for sewage, rather than the alternative glorified buckets, can pump out their waste. The Applicant has paid lip-service at least towards addressing the remaining objection ground mentioned in point (1) above. However, I have not seen evidence in the *Hydraulic Modelling Report* or learned of any amendment to the FRA that addresses those extant details requested by the EA in respect of the private sewage treatment system and which is purportedly intended solely for the clubhouse's usage. I believe that the Applicant has been complacent in this respect by being too vague and this falls foul of the EA's requirements. Even if planning permission were granted, the EA could deny the Applicant the requisite permit and leave the Applicant wallowing in

4 Conclusion

4.1 Water under the abridgement

I have curtailed my comments in this correspondence to address only a few of the matters of consideration amongst the many which are worthy of full attention. In previous correspondence relating to the former planning application [18/00904/F], I discussed at reasonable length traffic concerns on the Boddington Road – which includes pedestrian usage for accessing the canal at Hay Bridge (Bridge 143) (letter, 01.05.2019); I discussed obligations and demands concerning water supply to the canal from the reservoirs, but in particular the Boddington Reservoir which serves as a sailing club also (letter, 04.06.2019); and I have challenged various other fundamental points ranging from: spoil material for the dam being insufficiently water retentive (letters, 15.03.2019 and 13.09.2019 [resubmitted as Attachments A and B with this correspondence]), to light pollution (letter, 08.07.2018 with addendum correction 12.07.2018), to providing a report to CRT and copied to CDC on maintenance backlog issues regarding navigational concerns on the Oxford Canal (letter, 29.07.2018), and I also presented a challenge to CRT which was copied to CDC regarding CRT's reliance on a dubious algorithmic program predicting traffic and incident numbers over a twenty year duration (letter, 19.08.2018). I believe that the Committee would benefit from reading those letters referred to above in the process of formulating their decision and, undoubtedly, to revisit numerous other letters written by other respondents. To not do so would be to examine a substantially similar planning application in its content with a substantially edited public response, with the consequence of possibly arriving on a less well informed decision.

4.2 Reason

It is incumbent on the authorities to exercise due care that developments granted planning permission do not cause irreversible harm to the character of any surrounding landscape or cause adverse impact on the local ecology. As such, to name but a few, CDC's **Local Plans policy ESD8: Water Resources**, **Policy ESD13: Local Landscape Protection and Enhancement**, **Policy ESD16: The Character of the Built and Historic Environment**, should each receive proper attention in the context of the proposed development site. Policy ESD8 provides:

Water quality will be maintained and enhanced by avoiding adverse effects of development on the water environment. Development proposals which would adversely affect the water quality of surface or underground water bodies, including rivers, canals, lakes and reservoirs, as a result of directly attributable factors, will not be permitted.

Policy ESD13 provides:

Local Landscape Protection and Enhancement proposals will not be permitted if they would:

- Cause undue visual intrusion into the open countryside
- Cause undue harm to important natural landscape features and topography
- Be inconsistent with local character
- Impact on areas judged to have a high level of tranquillity

And Policy ESD16 provides:

The Character of the Built and Historic Environment

New development proposals should:

- *contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting.*

If it falls upon deciding what is the most sustainable and ethically correct use of land in the context of this proposed marina, on what is historically productive agricultural land, I hope the Committee possesses sufficient foresight to recognise that denial of the planning application is the answer. To finish on the same note that I commenced with in closing my first correspondence [08.07.2018]:

"Protection is not a principle, but an expedient." Benjamin Disraeli

Condition

Cherwell District Council's **Local Plans Policy ESD17 – The Oxford Canal** – provides:

We will support proposals to promote transport, recreation, leisure and tourism related uses of the canal where appropriate... [Emphasis my own.]

The appropriateness is a principal question, therefore a condition ought to be imposed on the Applicant to conduct an *Oxford Canal Impact Assessment* as part of their planning submission and for it to closely correspond with the model proposed above in paragraph 2.1. Data concerning available supply of water from the Canal and River Trust may be obtained from them upon demand, as required.

Yours sincerely,

Iain Kirkpatrick and written on behalf of Alison Payne

CC Richard Parry (CEO for CRT)

Attachment A

Clare O'Hanlon
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15th March 2019

RE App No: 18/00904/F

Objection to proposed inland marina at Glebe Farm, Boddington Road, Claydon.

Open Letter

1 Introduction

- 1.1 The amended planning application is, understandably, presented in the confident assumption that virtually everything contained therein is suitably *confirmed* in one or another of the policies, national or local, when viewed objectively upon the facts; however, the varying approaches to viewing posited facts often occasions the cast in different findings. A fact is *anything that happens*. Foresight is the precursor to one's avoiding the ramifications from a detrimental fact and its criterion to that end, is the appeal to reason. It may then, in the process of evaluating facts, be reasonable to dismiss certain postulations formed from statistical formulae (which the application is inundated with) on the basis that it does not actually reflect reality.
- 1.2 While I sympathise with the Applicant in respect of the expected negative impact on their farming business due to truncated land from the HS2 scheme, a scheme which in my opinion represents supreme folly, it does not permit a second wrong in the mitigating of that personal loss by the transposition of, what I and many others regard to be, a negative impact development proposed for the Oxford Canal. If it can be said here that "*two wrongs don't make a right*," a third attempt in obtaining planning approval by going to Appeal would surely commend the Applicant to a persistent course of error by encouraging them with the notion that "[if] *two wrongs don't make a right, try a third*." Therefore it is essential for the public wellbeing as well as for the Applicant, that a sound judgement is arrived at in the upcoming committee meeting and which denies this planning application.
- 1.3 The amended planning application is very lengthy and repetitious, as was the original. From my recent reading of the *Planning Statement* (version 2) and various appended documents, I have gathered that it is substantially the same construction requirements as previously applied for by the Applicant. The fundamental difference is in the reduction of berthage by 23.2%, reducing it from 250 to 192¹. It is not possible for me to address all of the points I think worthy of consideration² because I am constrained by time and wordage and must therefore discuss only a few. They are set out below.

2 Claydon Marina: staunch investment?

- 2.1 With regard to the uncertainty for the Applicant's farming business once subsidies have been lost and the

¹ A reduction of 23.2% in berthage will not equate to the same percentage of reduced light pollution. There has been no material change to the lighting arrangements in the amended planning proposal. For my comments on light pollution and reference to **Local Plan ESD15** and **ESD16**, see my correspondence dated 8th July 2018, para 3.2 (with footnote and the addendum attached thereto).

² The concerns raised in my correspondence dated 8th July 2018 and 29th July 2018 in response to the first draft planning application remain unchanged. Issues of waterway maintenance and water levels are a concern from one year to the next. I wish the contents of both letters to remain a factor in consideration at committee for the current planning application.

aftermath of the “*Brexit*” fiasco takes its toll, aspirations toward diversification into marina empire building¹ may prove to be like “*jumping from the frying pan into the fire.*” Potato growing (the Applicant’s intended sideline) may be by far the more lucrative option if the problem of irrigation can be surmounted by an agreement to the abstraction of water. If agriculture is to suffer from Britain’s departure from the European Union, it is reasonable to anticipate economic uncertainty in other industries also. Food production is essential, irrespective of the state of Britain’s economy, as is the consumption of that food by its citizens. In contrast, the leisure industry (for whom the Applicant would be providing an amenity) cannot offer such a dependable source of income; it is the expensive hobbies which are usually the first to succumb to abandonment during times of economic hardship.

- 2.2 If following from construction of the marina there should be a less buoyant market than anticipated and maintenance costs become onerous, a tremendous volume of water over a lengthy period could be lost if the dam containing the basin’s water fell into disrepair.
- 2.3 The proposed marina site’s land falls from the canal to the disused railway with a tributary to the Highfurlong Brook adjacent to that, which in turn joins the River Cherwell. Materials for the construction of the dam are, in their entirety, to be sourced from the spoil of the excavated lake and which is a clayey loam soil type with a ratio of approximately 30% - 40% clay to sand and silt (see **AGRICULTURAL LAND CLASSIFICATION MARCH 2017**). The soil composition is moderately friable and it may not be sufficiently water retentive (being slowly permeable) for use as an exclusive bund material. Seepage may pose a problem over a period of time. (For comments on the problem of badger setts, see my letter dated 8th July 2018, footnote 1 to para 3.3(i)(b)).
- 2.4 The requisite Engineer, once engaged, may determine that a requirement for waterproofing of the basin with a lining of either puddle clay or bentonite then requires the material to be imported to the site – amounting to a vast quantity and expense.
- 3 A question of public benefit: burgeoning tourism or bludgeoning tourism?**
- 3.1 Under subheading *Archaeology and Heritage Features* in the *Planning Statement (PS)*, the Applicant’s Agent acknowledges the adverse impact of the proposed marina development on the *character and appearance of the area*, but offsets that issue optimistically with a potentially overriding objective in counter-point: by proclaiming the facilitation of a *public benefit* (see **PS paras: 7.110, 7.113, 7.115 and 7.116**). There are six points I wish to raise in conjunction with paragraph 7.116, which follow.
- 3.2 As a former commercial boatman carrying and delivering fuel by boat, I believe that I am better acquainted than the Applicant’s Agent with regard to the general behavioural tendencies of boaters on the canal and by virtue of my frequent conversations with boaters from all walks of life in the course of business. As such, it is my opinion gathered from experience that, contrary to the Agent’s expectation that moorers from Claydon Marina will bolster the tourist industry, in fact most boaters who use their boats recreationally do come equipped with their provisions from home and supplement them en-route as needed. It is the hire boat market which most commonly and discernibly assists the tourist trade by patronising pubs for their meals, exploring towns and villages – but that is not the market the Applicant’s marina would be catering for. There are no plans to operate a hire fleet.
- 3.3 Fenny Compton is situated approximately 2½ miles from the proposed marina site and is a popular mooring location for boaters generally. During the holiday season, the provided mooring space can be full to capacity. Visitors coming by boat to Fenny Compton and wishing to stop for the canalside pub, sometimes have to cruise well beyond (sometimes as far as Claydon, if heading south) in order to find a suitable mooring. If hirers of a boat have planned to make the pub their evening’s destination after a day’s cruising, being unable to find anywhere to moor up upon arriving there is a disappointment. I have been regaled with many such complaints from disgruntled hirers, who have sometimes found that they could not stop at Fenny Compton on their return leg of the journey either; I have also on numerous occasions been unable to moor there due to the congestion. Therefore the introduction of a further 192 boats to the area will be counterproductive towards that aim of assisting the tourist trade, by instead inhibiting it.
(A new small marina off the School Lane in Cropredy with approved planning in 2012 (3 miles from the proposed Claydon Marina and 1 mile from the currently provided 250 berth Cropredy Marina) and comprising, I believe, 50 berths is now underway in excavation – **Ref: 11/010691F.**)
- 3.4 Unless the Applicant believes that their marina will be furnished with new build boats, there will not be an increase in revenue for Canal and River Trust (CRT) in supplied boat licences. It is more likely that existing

¹ One of the partners in the *W A Adams partnership* is Director of Debdale Wharf Marina (150 berths) and North Kilworth Marina (220 berths – opened 2018). The proceeds from farming must, comparatively speaking, seem like *small potatoes*.

boats will relocate from their present moorings, thereby easing congestion in one area and adding to it in another. Wear and tear to the canal's infrastructure caused by extra usage from a wider range of people endowed with varying degrees of competence or lack of, will only add to the eventual costs of maintenance for CRT in this region – at a detriment to the public.

- 3.5 The connection fee paid by marina operators annually to CRT will not travel far in terms of supporting overall maintenance costs; I believe that CRT could divulge the relative sum charged for a marina connection fee and also their average costs in replacing a set of narrow gauge lock gates (some of which are currently in desperate need of replacement on the Claydon lock flight – particularly Lock 20, at which, the gates resemble a colander).
[These gates have since been replaced.]
- 3.6 Having been referred to the *Biodiversity Impact Assessment* (BIA) (dated February 2019) in the last bullet point [in para 7.116], I read through *Appendix B – POST – DEVELOPMENT DETAILED CONDITION* and noted that target notes 1, 4 and 7 resulted in being graded “poor.” *Target Note 4* justified the condition result as poor because of the risk of water pollution to other wetland features (note paras 2.2 and 2.3 above) and implied a consequential harm to fish (see *BIA p14*). I fail to see how that appraisal could be construed as providing a public benefit.
- 3.7 I believe that the points raised above (paras 3.2 - 3.6) ought to prohibit Cherwell District Council (CDC) from considering a *set aside* of the *National Planning Policy Framework Paragraph 196*, which requires a positive bias towards serving a public benefit in that respect.

4 **Pedi impediment**

- 4.1 In the *Landscape and Visual Impact Assessment* (LVIA) paragraph 1.7 the Applicant challenges the opinion of the Landscape Officer concerning the Boddington Road, who reported that it is not a low impact rating (as misrepresented in the Applicant's *VP3 Road User* assessment) and said “*My judged rating is medium (adverse) but a high (adverse) for walker / visual receptors using the road.*” The Applicant's rebuttal to that is that the road is not intended for pedestrian usage because it is without pavement or intended access to and from the canal. Although that assessment concerns the visual impact, there are other factors of concern which arise from the Applicant's misinformed comments and apparent disregard for one small but significant sector of road user: the walker. The *Local Transport Plan 4 Policy 17¹* supports walking and cycling; the planning proposal does not.
- 4.2 The two roads directly leading from Claydon to the canal provide many parishioners, whether exercising by themselves or with dog(s), a circular walk along the canal towpath and which is enjoyed daily by some. Safety for pedestrians on the Boddington Road may significantly be compromised by an increase in traffic due to the limited space for one or several people to manoeuvre out of the way from passing vehicles (of all descriptions).
- 4.3 The *customary right* to walk these roads is established in antiquity, enjoyed continuously from a period beyond living memory, and indubitably, from the inception of Claydon village itself. The Applicant cannot interfere with that right.
- 4.4 While CDC cannot ensure any road user's full safety, they must exercise due caution against imperilling any person's life by negligently increasing a risk of accident. Moorers driving to and from the proposed marina, over distances beyond the local vicinity, will frequently use the M40 exit / access at Banbury. Claydon village and the A423 form the direct linkage route to the proposed site from the M40. No imploring from the Applicant to the moorers or sundry delivery drivers or other persons destined for the marina, will persuade the ubiquitous *Sat Nav* to purposefully take the driver on a charmingly circuitous route.

5 **Sum and substance**

- 5.1 The public have thus far unitedly opposed the planning application for this marina (deeming it not to be of *public benefit*) and various statutory consultees have either objected or expressed indifference. No-one (to my knowledge) has responded by saying that they cannot agree to the 250 berths but if it were reduced to 192 berths, that would be good.
- 5.2 Although an obiter point, at some time in the future the irrigation lake may serve the Applicant, once the potato enterprise ceases to be of interest, with a ready-made extension to the proposed marina. This could be accessed from the marina by a lock (minimal construction and potentially easier planning approval) with the use of a back-pump to maintain levels. That proposition was raised by me at the Parish Council meeting held in Claydon on 2nd July 2018, which the Applicant's Agent categorically denied as their agenda; however, there is

¹ Full title: *Connecting Oxfordshire: Local Transport Plan 2015 - 2031 Volume 1: Policy and Overall Strategy*.

nothing in writing to prevent that. If a kayak club establishes a use of the lake for recreational boating purposes, from that it may be a lesser leap in gaining planning to extend the lake's function to a mooring for recreational narrow boats (see PS para 7.226).

5.3 Both the Claydon and Clattercote Parish Council and the Oxfordshire County Council (OCC) submitted letters of objection to the first draft planning application. In the letter from OCC entitled *COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL* (dated 28th June 2018), the OCC requested that if the Local Planning Authority are disposed to approve the application contrary to their objections, they then provide them an explanation "*as to why material considerations outweigh OCC's objections...*"

At the time of writing, I am unaware of any subsequent representation from the OCC; and because local plans have to be consistent with the provisions of the structure plan drawn up by the relevant county planning authority and interpret its objectives, it is a reminder of that proverb (in common with the principles of law): "*A river does not run higher than its source.*"

Yours Faithfully,

Iain Kirkpatrick

(and written on behalf of)

Alison Payne

CC Richard Parry (CEO for CRT)

Attachment B

Clare O'Hanlon
Case Officer
Cherwell District Council
Bodicote House
Bodicote
Banbury
OX15 4AA

13th September 2019

RE App No: 18/00904/F

Objection to proposed inland marina at Glebe Farm, Boddington Road, Claydon.

1 Introduction

1.1 I hope this correspondence represents my final word of objection to the proposed marina at Claydon, Oxfordshire.

This letter addresses themes on Canal Related Travesties (Part 2), Pollution Discharge (Part 3) and Transport Conflicts (Part 4) in relation to the proposed marina at Claydon with an Objection Reason (Part 5) in conclusion, but which is in no way comprehensive in its scope or intended to preclude those comments expressed in my previous correspondence dated: 8th July 2018, 12th July 2018 (addendum), 29th July 2018, 27th August 2018, 15th March 2019, 1st May 2019 and 4th June 2019.

2 Canal Related Travesties

2.1 Water Supply

- (1) The Oxford Canal's summit, where the proposed marina lies, is served by three feeder reservoirs and a back pumping arrangement which draws water from the Napton pound to Marston Doles at the summit level. (It should be noted that there have been various occasions when the pump has failed due to a blockage.) The three reservoirs are: Wormleighton Reservoir (picture 1), Boddington Reservoir (picture 2) and Clattercote Reservoir (picture 3).



The pictures, taken on 9th September 2019, reveal that Wormleighton Reservoir is 0.56m below capacity (BC), Boddington Reservoir is 2.1m BC, and Clattercote Reservoir is 0.74m BC (however, I am told by local fishermen at Clattercote that the Bailiff has advised Anglers that levels will plummet there next week once Canal & River Trust (CRT) start drawing more water from it). These figures can only accurately represent what volume of water no longer remains available to CRT without conducting a topographical survey profiling the reservoir beds using sonar equipment and thereby providing evidence of their current capacity. (I am told that Banbury Sailing Club, operating from Boddington Reservoir, is currently restricted to approximately 50% of its sailing range; it hosted a race attended by 100 people on the 7th September 2019, of which only half were members. That is not a good advert for the club.) **Adopted Local Plan ESD 8: Water Resources** provides: "Development will only be permitted where adequate water resources exist, or can be provided without detriment to existing uses."

Levels in the reservoirs have been regularly topped up this year from rainfall, unlike last year in the drought. In preparation for increasing demands of water supply and the uncertainties of climate change, irrespective of the decision over Claydon Marina, CRT should maintain their reservoirs for increased capacity as a matter of duty.

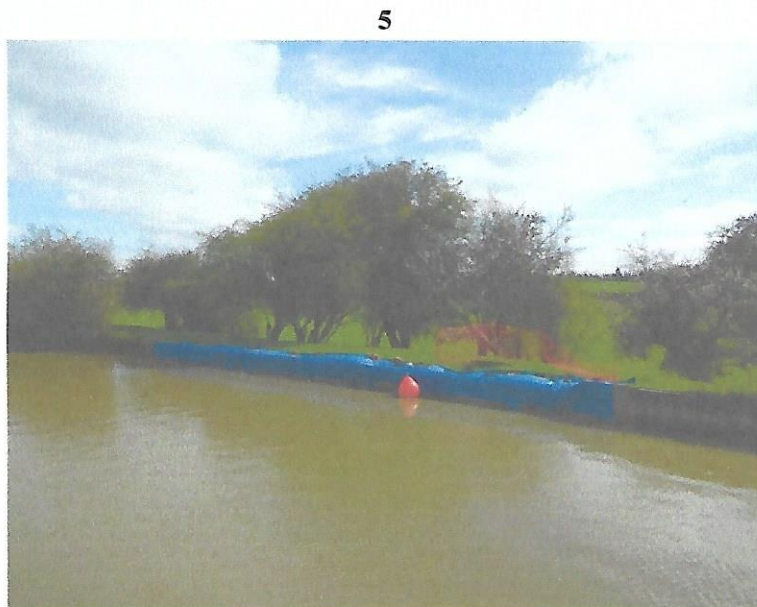
2.2 Water Loss

- (1) As an essential factor in water conservation, CRT need to stop leaks. Picture 4 below reveals excessive water loss from Lock 20 bottom gates on the Claydon flight, which have not yet been scheduled for maintenance.



[These gates have since been replaced.]

In the planning document titled *Flood Risk Assessment July 2019*, from hereon referred to as FRA 07/19, five breaches are noted to the east of Claydon, although none to the north (see p9, para 2.33). Picture 5, taken on 6th April 2019, shows a temporarily sealed breach at Priors Hardwick on the Oxford summit, between bridges 124 and 125 and north of Claydon, which had been dumping water into a culvert.



- (2) Furthermore, in the FRA 07/19 at paragraph 2.33, which refers to the *Preliminary Flood Risk Assessment*, it says that there was overtopping of the Oxford Canal in 2007, which may be seen in map 4 of that report, and also that predictive information is not available on the subject of future risks of flooding. The Applicant's (WA Adams Partnership) Agent (SB Rice Ltd) states: "*the Canal and Rivers [sic] Trust confirmed that they have no records of overtopping or flooding at this location (Appendix 1).*" (See FRA 07/19, p13, para 4.17.) Additional numbers of boats on the Oxford summit resulting from another marina, may prove inadvisable because of an increased risk in pollution following from the canal overtopping. I have seen the towpath untraversable from bridge 143 to 144 (area of proposed marina) due to floods on various occasions.

2.3 Claydon Marina's potential leakage or breach

- (1) The Agent writes, "*With reference to the British Geological survey online mapping, the site is located within an area of Charmouth Mudstone with no superficial deposits. To the north, within the floodplain of the ordinary watercourse, alluvial deposits of clay, silt, sand and gravel are recorded.*" The actual on-site auger samples

taken in 2016 indicate that the substrate in the tested areas of the proposed marina and lake is a clayey silty loam, with only a 30% – 40% clay ratio (see AGRICULTURAL LAND CLASSIFICATION MARCH 2017 and my letter dated 15th March 2019, para 2.3). Cherwell District Council's (CDC) **Adopted Local Plan 2011 – 2031 Policy ESD 6** requires that sites in close proximity to the Oxford Canal include a breach analysis within the Level 3 FRA.

The Agent asserts that, "As a result of the spoil excavated on-site being used for the construction of the Marina, there will be no need to import any additional material to the site." (See FRA 07/19, p11, para 4.2.) However, due to a legal requirement in accordance with the **Reservoirs Act 1975** for a Panel Engineer to oversee a development of this scale, his/her expert opinion may conclude that the basin needs lining for water retention. In that likely event, it would introduce considerable additional construction expense for the Applicant as well as hundreds of 20-tonne lorries coming through their farm. I note that amended plans delineate the extent of the basin and the outer extent of the business complex with an apparent clay lining, with exception to the southern bank that respects the alignment of the Oxford Canal. It is unclear where that clay lining is to be sourced, in light of the above.

2.4 Current potential causes of breach and incident

- (1) CDC's **Adopted Local Plan ESD 16** provides assurance that the canal towpath is accessible for *all users* and this comprises walkers, joggers and cyclists. That policy implies that a reasonable standard of care and safety is provided for all users of the towpath. In many places along the Oxford Canal towpath within CDC's district, gaping holes, which a person can injure themselves in even when walking or launch themselves over the handlebars of their bike into the canal from, are prevalent (many such incidents have occurred already). Picture 6 below (photograph taken on 7th September 2019) shows one of several sections of towpath bank which is deeply undercut on the pound between Locks 22 and 23 (above Cropredy), only 2 miles from the proposed marina site.

6



The vantage point is from my boat when cruising northward and whilst the pound was approximately 17 inches off-weir. (Incidentally, many short pounds either empty during the course of the day's activity or overnight.) That undercut, and various others, would not be visible to a walker or cyclist, particularly when that pound is full of water. When the surface of the bank finally collapses, it will probably deposit a person onto rocks below in the canal. This area is popular walking territory for boaters at Cropredy Marina and would be equally so for moorers at Claydon. It is not a small job to repair the extent of these holes along the Oxford Canal. CRT's bank staff are invaluable, but severely under resourced: I believe I am correct in reporting that the team responsible for call-outs in the management of everyday operations between bridge 141 (near to the county boundary) to Isis Lock in Oxford (totalling a stretch of 33 ¼ miles, 31 locks and 94 bridges – excluding motorway and railway), is currently only four in number with one position advertised.

3 Pollution Discharge

3.1 Affluent in effluent?

- (1) CDC's **Adopted Local Plan ESD 8: Water Resources** provides: "The Council will seek to maintain water quality, ensure adequate water resources and promote sustainability in water use. Water quality will be maintained and enhanced by avoiding adverse effects of development on the water environment. Development proposals which would adversely affect the water quality of surface or underground water bodies, including rivers, canals, lakes and reservoirs, as a result of directly attributable factors, will not be permitted."

The Environment Agency (EA) have expressed concern that the Applicant's proposed *private sewage treatment facility* would be *less reliable* than the public sewerage system and therefore not normally considered environmentally acceptable. They add, that even if the Applicant can demonstrate from a consultation with the sewerage undertaker that it is unfeasible to make a connection, they [EA] "*would have serious concerns about the amount of treated effluent that would be discharged into this small water body [Claydon and Wormleighton Brook, source to the Highfurlong Brook].*" In accordance with the **Environmental Permitting Regulations 2010** an *Environmental Permit* would be required, unless an exemption applies, and the EA state that may not be granted. (See FRA 07/19 Appendix C: letter from the EA, dated 13th July 2018, Ref: WA/2018/125260/01-L01.)

The Highfurlong Brook is a tributary of the River Cherwell, which in turn joins the River Thames. In the above referred to letter, the EA state: "*In addition, the Thames River Basin Management Plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.*" The Claydon and Wormleighton Brook adjacent to the proposed site, has already been classified poor due to its elevated phosphorus and high ammonia content and low dissolved oxygen levels (see Follow-up Report – Revision 3 (RSK), p6, para 2.2) and this would be exacerbated by foul discharge from Claydon Marina.

- (2) In a bid to mitigate, on account of the EA, the Applicant has reformulated calculations of foul discharge based on an exclusive output from the clubhouse and the dwelling during peak season usage (March – October – 245 days) and providing hypothetical figures relating to persons' toileting and ablutions (see FRA 07/19, Appendix M – Foul Discharge Calculations). The Applicant claims, "*it is understood that foul waste from narrowboats is usually pumped out to an underground holding tank ...*" [underline my emphasis] (see FRA 07/19, p20, para 6.25). The projected estimate of 2,360 litres of foul discharge per day amounts to 578, 200 litres over the above specified duration and this figure, despite being calculated to a formula, may be grossly underestimated. According to plans, there are to be two Elsan points on site, one located at the north-eastern end of the marina and the other at the south-eastern end (no septic tank is noted in the **Application for Planning Permission**, part 11). I have not seen from amended plans or section drawings anything showing the position or size of underground holding tanks; two would be required for two locations or one with a pipe that links one facility to the other's tank. The plan in the FRA 07/19, *Appendix K – Proposed Drainage Layout*, shows the above ground foul water pumping station, the rising main and its foul water treatment plant, which are located to the east of the clubhouse and dwelling. This private sewage system happens to be also within convenient range of the services bay where boats with their own effluent holding tanks will presumably be pumped out. It is not uncommon for marinas and boatyards to benefit from passing trade from boats on the canal for fuel (coal and diesel), gas (LPG) and pumpouts, to supplement their income. Therefore one would expect a holding tank to be situated at the facilities bay also, making a total of two or three holding tanks. The above provided quotation is very sketchy about the Applicant's intentions regarding holding tanks, which is somewhat surprising owing to the fact that many boaters treat their sewage with a product called *Elsan Blue* or its equivalent and which is a toxic and volatile fluid containing *formaldehyde* – which must not enter the food chain or any water course.

Notwithstanding a possibility that I have overlooked the whereabouts of such holding tanks in the Applicant's plans, the volumes of foul discharge projected in *Appendix M* do not genuinely account for the foibles of peoples' movements.

- (3) The Applicant [WA Adams Partnership] is evidently satisfied that they have circumvented requirement in a connection to the mains sewerage system, adding as a further assertion that CRT would probably object to a sewage pipe fixture on bridge 143 in order to connect with the mains sewer located about 870m from site (see FRA 07/19, p20, para 6.30). There is no indication that the Applicant has discussed options with the sewerage undertaker as conditioned by the EA. A sewage pipe could presumably connect with the Applicant's nearby farm, Springfield Farm at Lower Boddington, unless, of course, they are already using the brook for sewage disposal (see Follow-up Report – Revision 3 (RSK), p6, para 2.2: "*Possible causes of ... failing ... to achieve good ecological status include ... suspected sewage discharge.*")

Furthermore, it is proposed that treated sewage will undergo additional purification in reed beds, which, in the absence of clarification to the contrary, I assume to be in the proposed irrigation lake (formally intended to serve a crop of potatoes and subsequently a wildlife education centre for children) before being discharged into the adjacent brook (see FRA 07/19, p21, para 6.34).

4 Transport Conflicts

4.1 A conflict with policies

- (1) CDC's **Adopted Local Plan 2011 – 2031 ESD 16** provides: "*Other than appropriately located small scale car parks and picnic facilities, new facilities for canal users should be located within or immediately adjacent to settlements.*" The small car park and picnic area in question will provide 142 parking spaces and a clubhouse in lieu of a picnic table.

Access to the proposed Claydon Marina is via the Boddington Road, which is a single track road and currently quiet. The Applicant has agreed *verbally* with the Oxfordshire County Council Transport Planner that three passing places will be made (details to be confirmed) in mitigation over potential conflict (see Transport

Statement 2019, p12, para 4.10). Those passing places would alleviate, to a certain degree, conflict between domestic vehicles, but not for other users of the road – namely: walkers, cyclists and horse-riders. It is probable that such users will have vehicles pass them wherever they be on the road, as the driver *often* assumes priority. **Local Transport Plan Policy 17** encourages the reduction in requirement for travel, whilst supporting walking, cycling and public transport. A large development, such as Claydon Marina (192 berths), would be reached almost exclusively by its patrons in cars.

- (2) The Applicant states in paragraph 5.14 of the *Transport Statement July 2019*: “On Sundays and Bank Holidays there could be just under 1 [vehicle] per minute.” In paragraph 5.12 it is stated that: “Other than Bank Holidays the figures suggest roughly 1 vehicle every 4 ½ minutes at the busiest time of the day and 1 every 5 ½ minutes during the AM and PM peaks.” In relative terms to the current volume of traffic on the Boddington Road, it would be comparable to it becoming a main road overnight. The Applicant adds in paragraph 5.15, “In view of Boddington Road being lightly trafficked and the identified maximum traffic generation ... no mitigation measures would be required to accommodate the traffic generation.”

Although effectively supplanted by the **Oxfordshire Structure Plan 2016**, the **Non-Statutory Cherwell Local Plan 2011** serves as an interim policy for development control purposes which provides material consideration in the deciding of a planning application. The **Non-Statutory Cherwell Local Plan 2011 Policy TR4** requires that the Council be satisfied that *appropriate mitigation measures* will include either improved public transport or facilitate *improved pedestrian and cycle accessibility*. **Policy TR2** requires that development generating great demand for travel be at a highly accessible location for utilising alternative transportation to that of a private car. **Policy TR5** requires satisfaction in provision of a segregated area or an alternative appropriate measure in order to minimise vehicular conflict with pedestrians, cyclists and people with sensory or mobility impairments; and that there be *no compromise to the safe use of roads*. Non-compliance with relevant standards of road safety in a proposal, *will not be permitted*. **Policies TR8 and TR9** further oppose any prejudice toward pedestrian and cycling activities caused by a development. And, **Policy TR36** supports schemes on rural roads which create a *safe and convenient environment for pedestrians, cyclists and horse-riders*. Developments contrary to that effect, *will not be permitted*.

Three passing places, as verbally agreed by the Applicant, does not satisfy the above criteria.

4.2 Out of sight, out of mind

- (1) The current amended planning application shows that the intended vehicular access is to be repositioned so as to become a blind spot and it is to be located approximately half way between the originally proposed access (the route of the disused railway) and Hay Bridge (143) on Boddington Road. Due to the steep pitch of that humpback bridge, all visibility of the vehicles exiting Claydon Marina and joining Boddington Road would be obscured to oncoming traffic from Claydon. That would considerably increase potential for accidents. The Applicant’s statement that, “*the proposed marina therefore complies with local and national transport planning policy*,” would actually be funny if it were intended as a joke (see *Transport Statement July 2019*, p19, para 6.14 and paras 4.1(1) – (2) above). The only reason for that repositioned entrance is to take the proposed development away from flood-plain zones 2 and 3, to satisfy the Applicant’s own agenda – as is, in fact, the case with the whole proposed development.

5 Objection Reason

5.1 All of the above

- (1) It behoves the Local Planning Authority, Cherwell District Council, to ensure that they protect the interests of individuals, the community and the environment. A vast number of cogent arguments presented in opposition to this marina proposal from the public have demonstrated firstly, that a marina development in Claydon is not in the public interest; and secondly, that there are fundamental concerns in that proposition which remain a factor in terms of public enjoyment and viability in that utility demand on the Oxford Canal and its infrastructure. On these particular matters and numerous others, the public have declared a resounding “NO!”

Yours sincerely,

Iain Kirkpatrick

and written on behalf of Alison Payne.

CC Richard Parry (CEO for CRT)