

**Representations by Deddington Development Watch
to Cherwell District Council**

Planning application for permission to build 7 dwellings on land adjoining and west of Stonecroft House, Clifton Road, Deddington known as 'The Poplars' (Application no. 20/03467/F)

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DEDDINGTON DEVELOPMENT WATCH

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27 January 2021

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For the attention of Mr Matthew Chadwick,
 Principal Planning Officer

Dear Sir,

Planning application for permission to build 7 dwellings on land adjoining and west of Stonecroft House, Clifton Road, Deddington known as 'The Poplars' (Application no. 20/03467/F)

We should like to make the following comments on the above application by Blue Cedar Homes Limited for full planning permission to build 7 dwellings on the western part of the field called 'The Poplars' between Clifton Road and the Castle Grounds. The Appendices referred to are set out in a separate document for convenience of reference.

The Poplars is an "important open green space" outside built limits and within the Deddington Conservation Area, adjacent to Deddington Castle (a Scheduled Ancient Monument).

1. Planning context of The Poplars

(a) Planning history

Between 1959 and 2001 nine applications were submitted for permission to build between one and five detached dwellings on the frontage of The Poplars with Clifton Road. All the planning applications were refused. There were appeals against two of the refusals, in 1974/5 and in 1979. Both appeals were dismissed. A tenth application was made in 1969, but was withdrawn.

An eleventh application to build 26 houses was made by Banner Homes Limited in 2014 (ref. 14/00412/F). In a letter received on 22 April 2014, English Heritage

recommended that the application should be refused. The Summary at the beginning of the letter read:

The proposed development is adjacent to the scheduled monument of Deddington Castle. It would significantly detract from the current open aspect of the castle and would cause substantial harm to the significance of the asset through the impact upon its setting. No public benefits are offered which would outweigh that harm and the application should be refused.

The application was subsequently withdrawn by Banner Homes.

There is a summary of the previous planning applications in Appendix I.

(b) 2018 HELAA

The potential for sustainable development of The Poplars (site no. 117) was considered by the Council in its Housing and Economic Land Availability Assessment (HELAA) published in February 2018.

Using the 'traffic light' system, The Poplars achieved a 'red' rating for lack of Suitability and Achievability and a 'green' rating for Availability. The overall rating was 'Not suitable'.

The summary of the Council's assessment reads:

Greenfield site outside the built-up limits. Deddington is a Category A village in the adopted Local Plan Part 1, the category of the most sustainable villages in the district. The adopted Local Plan makes provision for some development (10 or more homes and small scale employment) at Category A villages. The site lies adjacent to an Archaeological Constraint Priority Area. Deddington Castle Scheduled Ancient Monument lies immediately adjacent to the southern boundary of the site and the whole site lies within the Conservation Area. The site is considered to be unsuitable for development as it would impact on the open character of this area and the loose knit settlement pattern. It will significantly detract from the current open aspect of the castle (a Scheduled Ancient Monument) and would cause substantial harm to the significance of the asset through the impact upon its setting. Development would also affect the setting of the nearby Grade 2 listed building. With regard to assisting Oxford with its unmet housing need, Deddington lies outside Areas of Search A and B.*

(c) Remainder of The Poplars

The application site comprises approximately one-third of The Poplars, which field extends to 4.13 acres, on the western side. The southern boundary of The Poplars immediately adjoins the dry moat or ditch and stone wall marking the northern boundary of the western bailey of the Norman castle. The applicant proposes that there should be a token gap between the southern boundary of the application site and the boundary of The Poplars with the Scheduled Ancient Monument.

While the application documents say that the remaining two-thirds of the field would be returned to pasture "under a grazing regime", the documents are completely

silent about ongoing ownership, so there is no guarantee that the rest of the field will be safe from future development.

1.4 These proposals represent the only development aspirations that the applicant has for the site. There is no intention to provide any further development in subsequent phases. This is an important issue and clearly indicates that no further development proposals are being considered. (Planning Report)

It is difficult to take this statement at face value. Developers do not normally purchase a site three times the size of their requirements with the stated intention of never developing the remaining 2/3rds, nor does this maximise the return for the vendors. Expressions of intent are not legally binding, and the land could, for example, be on-sold to another house builder with different ideas.

There is therefore concern that permission could subsequently be sought for building further houses within the setting of the Scheduled Ancient Monument.

(d) Similarities with St Thomas Street application

The circumstances of the current Poplars application are analogous to an application submitted in 2013 for outline permission to build 7 houses on land within the Conservation Area between the rear of St Thomas Street and the western boundary of the Castle ramparts (ref. 13/01941/OUT). The application site was further away from the Scheduled Ancient Monument than the current Poplars application site.

The application was refused by the Council, which decision was upheld by a Planning Inspector in a decision in 2015 dismissing an appeal against CDC's refusal to permit a development scheme. Please see Section 3(b) below and paragraphs 6-16 of the Inspector's decision, which is attached as Appendix II.

2. Revised NPPF and Cherwell Local Plan policies on heritage assets

(a) The relevant provisions of the Revised NPPF are as follows:

193. 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

(a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II**

registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

(b) Local Plan Policy ESD 15: *The Character of the Built and Historic Environment* specifies that new development proposals should (*inter alia*):

- 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.

- Conserve, sustain and enhance designated and non-designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG.

(c) Saved Policy C25 states that in considering proposals for development which would affect the setting of a Scheduled Ancient Monument, the Council will have regard to the desirability of maintaining its overall historic character.

(d) Saved Policy C33 states that the Council will seek to retain any undeveloped gap which is important in preserving the character of a loose-knit settlement structure or maintaining the setting of heritage assets or preserving a view of recognised historical value.

(e) That sites should avoid significant adverse impact on heritage assets is also one of the criteria in Policy Villages 2.

3. Impact on significance of Deddington Castle

(a) Relationship of application site and SAM

The southern boundary of the application site is very close to the dry moat or ditch constituting the boundary between The Poplars and the northern side of the western bailey of the Norman castle complex known as Deddington Castle or the Castle Grounds (Scheduled Ancient Monument, list number 1014749).

Please find below an aerial photograph of The Poplars looking west towards the Castle Barns on its western boundary, with Castle End behind (see Section 4(c) below). The open green space surrounded by trees in the top left is the interior of the western half of the western bailey. The photograph was taken in autumn when the deciduous trees were still in leaf.



There is also a Google Earth photograph of Deddington, with summer foliage, in Appendix III. The Scheduled Ancient Monument is in the bottom right half of the Google image.

The south-east corner of the application site is some 150 metres from the Inner Bailey which stands on the motte at the eastern end of the western bailey - the focal point of the Norman castle. The spur of higher ground marking the Inner Bailey affords elevated views to the north, including across the application site almost directly beyond, even in summer. (See photographs 1 and 2 in Appendix IV.)

The application site is dominated by the prominent parallel tree-lined banked ramparts on the northern side of the western bailey of the Norman castle.

The path along the top of the banked ramparts (Upper Walk) would directly overlook the proposed development. Although the embankment is lined by tall veteran trees, there are moderately filtered views of the application site in summer (see photograph 3 in Appendix IV), while the site is clearly visible below in late autumn/winter/spring when there is little or no foliage on the deciduous trees (see photographs 4 and 5 in Appendix IV).

Since the ramparts are c. 6 metres (19½ feet) high relative to the dry moat or ditch below, the path would afford a prime view of the estate development beneath.

An old track following the course of the dry moat or ditch leads from Castle Street to the Inner Bailey along the foot of the embankment, lined by sycamore, beech and oaks (see photograph 6 in Appendix IV). There is an old ironstone rubble wall on the left which defines the south side of the curtilages of Castle End (Grade II*) and the Castle Barns (curtilage listed Grade II*) and then the south side of The Poplars. The wall also marks the boundary of the Scheduled Ancient Monument.

(b) Significance of location

The Norman castle complex was deliberately located away from the settlement in an area of open space and would have dominated the surrounding landscape, militarily and physically, thereby making a strong political statement on the part of the new Norman rulers.

Both the western bailey, with its extensive surviving ramparts, and the equally extensive eastern bailey, remain entirely surrounded by open green space, except for a short interface in the north-west corner of the western bailey with the rear curtilages of Castle End and the Castle Barns as mentioned in the last paragraph of Section 3(a) above.

The significance of the Scheduled Ancient Monument was described by English Heritage in a letter on 31 March 2014 in connection with the St Thomas Street application as follows:

Deddington Castle "is a nationally important designated asset and is one of the best preserved earthworks relating to the period in Oxfordshire. Unlike other similar castles, it appears to have been located remotely from the original village of Deddington and this separation has been perpetuated over time. Whether deliberate or not, the setting of the asset remains open countryside on all sides except a small section of the circuit. The castle has illustrative value in demonstrating how the Normans dominated the surrounding landscape militarily and physically, and the existing open setting contributes to that significance."

The application site is likewise part of the setting of the Deddington Castle complex, and the open nature of The Poplars makes an important contribution to the significance of the Scheduled Ancient Monument.

The development of housing on the application site would significantly erode the open quality of the space between the castle and the village. This would diminish the sense of isolation and the illustrative value identified by English Heritage.

The Council's Senior Design and Conservation Officer commented in a memo on 5 March 2014 that *"the area of open space forms an important buffer between the village and the Scheduled Ancient Monument"*.

The Council's Landscape Planning Officer commented in a memo on 12 February 2014 that: *"The castle is a significant feature in the landscape and needs space around it for its sense of scale to be appreciated."*

(c) Views of the tree-lined banked ramparts from north of Clifton Road

As mentioned in Section 3(a) above, on the south side of the dry moat or ditch and stone wall marking the northern boundary of the Scheduled Ancient Monument there is an imposing tree-lined embankment constituting part of the outer fortifications of the western bailey of the Norman castle. These earthworks are a prominent feature viewed from the B4031 Clifton Road on the northern side of the application site when approaching Deddington from Clifton (see photograph 1 in Appendix V), and from

the public footpath (no. 187/2) across the field called Towns End opposite the application site on the north side of Clifton Road.



The almost iconic 180 degree panoramic view from Clifton Road of the tree-lined banked ramparts emphasises the commanding position of the castle, and positively contributes to the character and setting of the northern side of the western bailey. Harm to this view would counter the objectives of Saved Policy C33 to maintain the setting of heritage assets and preserve views of recognised historical value.

The incongruous sight of modern housing on the application site, even if partially screened in summer, would significantly erode the open quality of the unspoilt space surrounding the northern aspect of the Scheduled Ancient Monument and diminish the sense of isolation and illustrative value identified by English Heritage/Historic England, thereby causing substantial harm to the significance and setting of the SAM.

4. Impact on Deddington Conservation Area

(a) Primary legislation

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) provides as follows:

In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

(b) Significance of open spaces

The application site lies in the north-east of the Deddington Conservation Area. The site represents approximately one-third of The Poplars. The field currently comprises grassland, bounded in part by ironstone walls - a traditional setting on this side of the village - and is bounded by veteran trees.

The areas of open space on the northern, eastern and southern edges of the Conservation Area, which are valued for their tranquil character, are included in the Conservation Area on account of their contribution to the setting of the historic core of the village.

Section 14.5 (Protection of important open spaces and views) of the Deddington Conservation Area Appraisal 2012 states: *"There are a number of open spaces within the village that it is important to protect because they are integral to the*

character and appearance of the conservation area. The inclusion of these open spaces in the designation of the conservation area is specifically to ensure that these spaces are preserved".

This reflects paragraph (iii) of Section 3.2 (Implications for new development) of the chapter on the Ironstone Downs in the Cherwell Countryside Design Summary (June 1998), which states: *"Open space, which forms an important part of the character of the village, should remain undeveloped"*.

The northern boundary of the application site is located at one of the four 'gateways' to the Conservation Area, where Clifton Road becomes Castle Street. The eastern part of Castle Street is relatively quiet due to its position at the eastern edge of the village. It is characterised by relatively low density development compared with the rest of the built Conservation Area, as the verges become wider and trees become more evident.

(c) Setting of listed buildings

(i) The listed buildings in the immediate vicinity of the application site are Castle End and Monks Court/Applewood, and two buildings known as the Castle Barns (see aerial photograph at the top of page 5).

Castle End is a Grade II* listed building (list entry no. 1046345) dating from the sixteenth century. The property was divided into two dwellings in more recent times, the separate dwelling comprising the northern wing of the building being called Monks Court (now Applewood). Castle End and Monks Court/Applewood are at the eastern end of Castle Street, close to the western boundary of the application site.

The Castle Barns (ref. BF112493), which directly adjoin the application site, are curtilage listed to the Grade II* Castle End per CDC planning consents 04/01254/LB and 08/02189/LB.

According to the Design and Access Statement in connection with CDC listed building consent application ref. 07/01744/LB, the Castle Barns comprise *"four separate buildings all facing onto a central grassed courtyard. The barn and stable block were originally built for a Hall house dating from 1350. The great barn was built in the mid-17th century and has reputedly been built from ironstone taken from Deddington Castle. In parts the land adjoins the dry moat belonging to the castle. The stable block has an oak cruck beam constructed under Norfolk reed thatch."* There is also reference to a coach house dating from 1802 to the right of the main entrance to the property.

While mentioned in the body of the Deddington Conservation Area Appraisal in 2012, the listing and description of the six Grade II* buildings in Appendix 2 omits to mention Castle End and Monks Court/Applewood, although the property is highlighted in Figure 19 on page 58.

Curiously, the listing and description of Grade II* buildings in Appendix 2 of the Appraisal jumps from no. 2 on page 59 to nos. 4 and 5 on page 60, suggesting that

Castle End and Monks Court/Applewood, and the Castle Barns, should have appeared as no. 3.

The western bailey and the eastern bailey remain entirely surrounded by open green space, except for a short interface in the north-west corner of the western bailey with the rear curtilages of Castle End and the Castle Barns.

The current open views from the Castle Barns across the application site towards the ramparts would be replaced by the sight of modern housing immediately adjacent. (See photograph 1 in Appendix VI.)

(ii) A housing development would also harm the view from the eastern side of The Poplars of the visually prominent tower of the Grade II* listed parish church of St Peter and St Paul, with its eye-catching pinnacles and gilded vanes, in late autumn/winter/spring, when there is little or no foliage. (See photograph 2 in Appendix VI.)

(iii) There is also a 'locally listed' building opposite the northern boundary of the application site, on the corner of Castle Street and Earl's Lane, called Rushall House (formerly The Gas House).

(d) Visual analysis and amenity

(i) By reference to the plan (Fig. 15) in Section 9 (Visual Analysis) of the Deddington Conservation Area Appraisal (reproduced in Appendix VII):

- there is a 'positive vista' cone symbol pointing south across the application site towards the tree-lined banked ramparts on the northern side of the western bailey standing at the eastern gateway to the Conservation Area where Castle Street ends and Clifton Road begins (see photograph 1 in Appendix V);

- there is a 'positive view' arrow from the middle of the path along the top of the tree-lined banked ramparts (Upper Walk) pointing north across the centre of the application site (see photograph 4 in Appendix IV);

- the northern boundary of the application site is located at one of the four 'gateways' to the Conservation Area marked on Fig 15.

This understates the 180 degree panoramic view from Clifton Road of the tree-lined banked ramparts along the northern boundary of The Poplars (see Section 3(c) and photograph 1 in Appendix V).

The proposed housing development would extend the built limits of the village, thereby becoming the new visual entrance from the east to the village and the Conservation Area.

(ii) Residential development on the application site would be clearly visible from public view:

- looking outwards towards the north-west from the mound marking the Inner Bailey (see photographs 1 and 2 in Appendix IV);
- looking outwards towards the north from the path along the top of the tree-lined banked ramparts (Upper Walk) on the northern side of the Castle Grounds (see photographs 3 to 5 in Appendix IV);
- from the north along the B4031 Clifton Road and the footway running along the south side of the road (see photograph 1 in Appendix V);
- from the north, from the public footpath (no. 187/2) crossing the field opposite on the north side of Clifton Road known as Towns End.

The effectiveness of the proposed perimeter screening is questionable, especially when seen from the raised viewpoints on the motte and the banked ramparts, while the access road with visibility splays would be particularly prominent from the Clifton Road side. The new development would still register as housing when viewed from the Castle Grounds or from Clifton Road, and not as open space.

(e) Communal value

The Conservation Area and its open spaces are important features of Deddington and highly valued by residents. The Castle Grounds are much used for walking and are well-visited.

In the Neighbourhood Plan parish questionnaire completed by 914 residents (a 58.85% response rate) in 2014, 96% of respondents (820 people) considered that it was very important or quite important to protect the Deddington Conservation Area. 88% (740 people) felt that green spaces in and around the Conservation Area should be protected to preserve the rural setting of the historic village. (Figures refer to the number of residents responding to that particular question.)

5. Archaeological significance

As observed by English Heritage/Historic England, The Poplars has considerable potential to contain undesignated heritage assets in the form of archaeological remains, being immediately adjacent to the Norman castle. Previous excavations have been confined mainly to the Inner Bailey, when evidence of substantial late Saxon occupation was found. There is evidence of activity in the locality in Roman as well as prehistoric times. It is also known that in the high middle ages prior to Deddington's aspirations (ultimately unsuccessful) to become a borough, the settlement focus was to the east of the present village centre.

OCC Archaeology has commented that the application site is located in an area of archaeological potential immediately north of the scheduled ancient monument, and that although the scheduled area of the castle is outside of the proposed development area it is possible that aspects of the castle could survive within the development area.

The proposal site is also located 80m SW of a medieval shrunken village (PRN 9437) which survives as a series of earthworks related to the holloway and crofts. The Holloway is thought to be an original continuation of the line of Clifton Road. As there is evidence of medieval settlement along this possible continuation of the road then it is possible that further medieval settlement existed along the current Clifton Road, on the northern side of the proposed [sic] development area.

The name of the field crossed by footpath no. 187/2 on the north side of Clifton Road opposite the application site, Towns End, signifies that in the high middle ages this field was adjacent to the limits of the settlement.

The proposed development could therefore impact on previously unknown archaeological features related to the medieval settlement and the scheduled castle.

6. Impact on character and appearance of area

(a) Cherwell Local Plan policies

(i) Local Plan Policy ESD 13: *Local Landscape Protection and Enhancement* says (*inter alia*) that 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;*
- *harm the setting of settlements, buildings, structures or other landmark features; or*
- *harm the historic value of the landscape.*

(ii) Saved Policy C33 states that the Council will seek to retain any undeveloped gap which is important in preserving the character of a loose-knit settlement structure or maintaining the setting of heritage assets or preserving a view of recognised historical value.

(iii) That sites should avoid significant adverse impact on the landscape is also one of the criteria in Policy Villages 2.

(b) Impact on character

The application site lies outside the built limits of Deddington at a key entrance to the village on its eastern side. The proposal would involve development on open green space and the extension of the built area, leading to ribbon development along the south side of Clifton Road leading out of Deddington, inconsistent with the historic loose-knit pattern of development on this approach to Deddington, which is characterised by open fields and scattered buildings set back from the highway.

The character of the eastern edge of the village is sensitive to change on account of its historic context and setting, and the gentle transition between the surrounding countryside and the built form of the village. The strong rural approach along Clifton Road positively contributes to the character and appearance of the village and the setting of the SAM and Conservation Area. (See map of Conservation Area attached as Appendix VII.)

While The Poplars has not been cultivated or grazed for some time, the Planning Inspector in his decision in the 1979 appeal observed:

"The tree-lined, gently sloping field which is the appeal site provides such a pleasant park land setting for the grass-banked castle remains which are a Scheduled Ancient Monument, and in itself forms such an attractive feature of this part of an area of Great Landscape Value at the edge of the village that I believe it should be left undisturbed. To erect along its frontage a short line of houses - even of the finest design, quality and execution - would completely alter the character and detrimentally affect the appearance of this area."

If pavements and street lighting were to be introduced in Earl's Lane on account of poor pedestrian connectivity from the application site to the Deddington Health Centre (see Section 7(c) below), or if physical traffic calming were to be introduced in Clifton Road on account of excessive speeding (see Section 8 below), the consequent urbanising impact would cause substantial harm to the character and appearance of this edge of the village.

Were the proposed development to proceed, it is to be expected that the existing stretch of narrow poorly surfaced footway on the south side of Clifton Road adjacent to the application site would be replaced by a suburban pavement, with blister tactile paving where the pathway crosses the access road.

From the Clifton Road, and the footpath opposite, the presence of modern development behind the entrance road, and visibility splays, would be readily apparent.

Residential housing on the application site also raises the prospect of light pollution on the rural edge of the village.

7. Connectivity of facilities

(a) Accessibility of local services

That sites should be well located to services and facilities is one of the criteria in Policy Villages 2.

The walking routes from the application site to village facilities are substandard and potentially problematic for those with mobility difficulties (e.g. more elderly people). Clifton Road is not served by public transport

The application site is located on the eastern edge of the village approximately 500 metres from Market Place where the majority of retail and catering premises, and bus stops, are to be found, approximately 400 metres from the Health Centre in

Earl's Lane, and about 0.8 of a mile from the multi-purpose Windmill Community Centre in Hempton Road.

OCC guidance is that dwellings should be within 400m walking distance of bus stops.

The northern boundary of the application site, and the road entrance/exit to/from the proposed development are located at the western end of Clifton Road where it becomes Castle Street, and opposite the 'T' junction with Earl's Lane.

At this point, the sub-standard footway on the south side of Clifton Road ends, obliging pedestrians to cross to the opposite side of the road either to proceed along the pavement on the north side of Castle Street towards the village centre or to walk along Earl's Lane, which has no footway. (See photographs 1 and 2 in Appendix VIII.)

This is not a safe crossing point, as previously observed by OCC Highways, especially for older people, because of poor visibility at the curvature of the road as it enters the village immediately past the junction with Earl's Lane, so that pedestrians crossing the road have less time to keep clear of eastbound vehicles emerging at speed as they round the 'blind' bend.

(b) Route to Market Place

As regards access on foot from the application site to Market Place, the 'desire line' goes along Castle Street and through Chapel Square. The alternative route via Earl's Lane is more circuitous and exposed.

Either way, pedestrians would be obliged to cross the main road whenever they leave or return to the application site although there is not a safe crossing point because of the 'blind' bend, as explained in Section 7(a) above.

There is a further hazard for pedestrians at the eastern pinch-point in Chapel Square on account of the lack of any footway on either side of the road (see photographs 1 and 2 in Appendix IX). Also the pavements at the western pinch-point are rather narrow (see photographs 3 and 4 in Appendix IX).

There are other road safety issues concerning Clifton Road, especially excessive speeding, which are discussed in Sections 8(a) to (c) below.

(c) Route to Health Centre

The Deddington Health Centre is situated approximately 400 metres from the application site on the north side of the village centre in the middle of Earl's Lane.

As regards access on foot to the Health Centre, from the application site Earl's Lane is accessed by crossing Clifton Road at the 'T' junction on the north side of the road just before the above-mentioned 'blind' bend and Clifton Road becomes Castle Street.

The eastern part of Earl's Lane retains the character and appearance of a country lane with no development on either side of the roadway until Pound Court close to

the Health Centre. Up to this point, there are no footways, and only narrow verges, with a ditch on the north side, forcing pedestrians to walk in the carriageway. There is a solitary street lamp near the surgery. Nor is there any footway where Earl's Lane joins Clifton Road.

Earl's Lane is a 'rat run' and the eastern part is not considered to be a safe pedestrian route because of the road safety issues discussed in Section 8(d) below.

A further complication in accessing the Health Centre from the application site on foot is the electricity substation located adjacent to the surgery which encroaches on the footway (see photographs 1 and 2 in Appendix X). In consequence, the footway at this point is too narrow for a wheelchair to navigate, and users, able-bodied or otherwise, are likely to be forced to walk in the road avoiding the parked cars.

(d) Windmill Community Centre

The location of the application site on the eastern edge of the village is about 0.8 of a mile from the multi-purpose Windmill Community Centre (recently refurbished) off Hempton Road on the western edge of the village, with facilities for groups, clubs and societies as well as extensive sports and recreational facilities.

(e) Sustainable travel

Contrary to Policy Villages 2, the proposed development would not be well connected with its surroundings so as to provide convenient access to local facilities. The lack of a safe crossing point, especially for older people, adjacent to the 'blind' bend where Clifton Road becomes Castle Street, in order to access any of the village facilities, including the Health Centre in Earl's Lane, is a significant road safety issue.

On account of distance and questionable continuous safe walking routes, access to many local services and facilities from the application site would therefore be likely to be private car dependent resulting in adverse incremental environmental consequences contrary to Local Plan Policy ESD 1: *Mitigating and Adapting to Climate Change*, as well as exacerbating the chronic lack of daytime parking space in the village centre.

8. Traffic and highways implications

Whether satisfactory vehicular and pedestrian access/egress can be provided is one of the criteria in Policy Villages 2.

There is concern amongst local residents about the road safety implications of the proposed development.

(a) Clifton Road: Excessive speeds

The relatively straight open nature of the B4031 Clifton Road between Deddington and Clifton encourages excessive speeds. On the approach to Deddington at The Little House, the national speed limit is reduced to 40 m.p.h. After 400 yards the

speed limit is further reduced to 30 m.p.h. There were two fatal accidents in 2011, and a serious injury accident in 2013, on Clifton Road.

Excessive speeding along Clifton Road was confirmed by a traffic speed survey carried out by residents on the 40 m.p.h. zone side of the 30/40 m.p.h. sign adjacent to the eastern boundary of The Poplars during mid-afternoon on 27 February 2014 and at AM peak times on 3 March 2014. The survey was carried out with a laser 'gun' and only 'free flow' vehicles were recorded.

Mean speeds of between 40.6 m.p.h. and 44.3 m.p.h. were recorded. The highest speeds recorded were between 55 m.p.h. and 63 m.p.h. The proportion of vehicles exceeding the 40 m.p.h. speed limit was between 66% and 91%. The detailed results of the speed survey, which are set out in Appendix XI, were forwarded at the time to OCC Highways.

(b) Castle Street/Clifton Road 'blind' bend

Apart from excessive speeding, as mentioned in Section 7(a) above there is a sharp 'blind' bend in both directions adjacent to the northern boundary of the application site where Clifton Road enters Castle Street (or Castle Street becomes Clifton Road). See photographs 1 and 2 in Appendix VIII.

The road safety risks from speeding along Clifton Road are compounded by the propensity of many drivers to enter the 'blind' bend (from either direction) at speeds which are unsafe. In particular, eastbound vehicles accelerating round the right-hand bend frequently cut the corner and stray across the centre line (see photograph 3 in Appendix VIII), causing westbound traffic entering the 'blind' bend to have to brake sharply, sometimes forcing them to mount the kerb and damage the grass verge.

The road here is slightly less than 6 metres wide, which explains why vehicles straddle the centre line. Large westbound vehicles (e.g. lorries, coaches) are also likely to straddle the centre line, forcing eastbound vehicles coming round the bend to mount the pavement on that side of the road. This poses a threat to the safety of pedestrians, especially older people. There is no pavement on the opposite side of the road.

(c) Road safety petition

In April 2014 73 residents of Clifton Road, Castle Street and Chapel Square, representing 99% of contactable residents, signed a petition to the County Council calling on it to object to a proposed development on The Poplars (ref. 14/00412/F) on road safety grounds (see Section 1(a) above). The text of the petition is set out in Appendix XII.

(d) Health Centre and Earl's Lane

If the application site were to be developed, the pedestrian route to the Health Centre in the middle of Earl's Lane (approx. 400 metres) would be potentially hazardous for people walking to/from the surgery contrary to Policy Villages 2 on account of:

- the need to cross Clifton Road at the 'T' junction with Earl's Lane just before the 'blind' bend (see Sections 7(a) and (c) above);

- the need to walk in the roadway along the eastern part of Earl's Lane as it is bordered on both sides by narrow soft grass verges (with a ditch on the northern side) and there is no footway;

- the necessity of negotiating the congested on-road overflow parking in the vicinity of the Health Centre and the electricity substation encroaching on the footway;

- the lack of street lighting along the eastern part of Earl's Lane during the dark winter mornings and early evenings, apart from a solitary street lamp towards the Health Centre;

- the volume of through traffic, including lorries, heading for the M40 and centres such as Bicester, Milton Keynes and Northampton, using Earl's Lane as a short cut to join the Clifton Road to avoid the traffic bottleneck at the A4260/B4031 crossroads and the two pinch-points in the centre of Deddington (Chapel Square), especially during the morning peak 'rat-run'.

9. Conclusion

We fully understand the desire for retirement accommodation, but this does not have to be at the expense of a nationally important designated heritage asset.

In particular:

- the proposals would result in substantial harm to the significance of Deddington Castle SAM;

- there would be substantial harm to the setting of the Conservation Area;

- the proposals would be harmful to the character and appearance of the rural eastern approach to Deddington;

- the application site has poor pedestrian connections to village centre services and facilities, including bus stops, and to the Health Centre;

- there are road safety issues concerning Clifton Road in the vicinity of the site.

On the basis of the foregoing, we believe that the adverse impacts of the proposals would significantly and demonstrably outweigh the benefits.

For these reasons we urge the Council to refuse the application.

Yours faithfully,

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Sir Frank Davies C.B.E.
Chairman

