

Our ref: Q210843
Your ref: 21/03522/OUT
Email: matthew.sharpe@quod.com
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Cherwell Planning Department
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For the attention of Planning Case Officer
By Planning Register

To whom it may concern,

Representation in respect of planning application for land known as 'PR9' at OS Parcel 3673 Adjoining and West Of 161 Rutten Lane Yarnton OX5 1LT (LPA reference 21/03522/OUT)

Quod are instructed by Oxford University Development Ltd ('OUD') to submit representations in respect of outline planning application (ref: 21/03522/OUT) submitted by Merton College ('the Applicant') for the development of land known as PR9 ('the Site'). OUD is preparing proposals for the nearby site, the land allocated by Policy PR8 of the Local Plan. OUD therefore has a valid and keen interest in the development of this neighbouring site and in ensuring that a co-ordinated approach is taken in the consideration of this and other nearby sites.

From the outset, we wish to make clear that our representation focuses on the sustainable transport strategy that the project could help support, along with providing comments on Transport Statement and the approach taken to infrastructure provision. OUD is supportive of the principle of development in so far as it seeks to realise the Local Plan's ambition of delivering high quality sustainable development that can go towards meeting Oxfordshire's housing needs and delivering environmental and ecological benefits for the District. However, we have reviewed the application and have concerns that the project does not place sufficient emphasis on encouraging more sustainable alternatives to the car, including new bike infrastructure to Parkway and the city centre. Such infrastructure should be coordinated in a way that helps ensure that the PR sites make fair and proportionate contributions to such infrastructure.

Transport Assessment ('TA') underpinning the development does not include adequate information to fully understand the potential impact of the proposed development, nor whether the mitigation package provided as part of the application would be adequate. Issues of cumulative assessment are important in this context.

Transport Assessment

The Transport Assessment (TA) models the potential impact of the proposed development upon the local highway network based on 7 modelled junctions. We consider that there would be benefit in widening the scope of the assessment to include the junctions at Peartree, Wolvercote, Kidlington and

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Cotteslowe roundabouts. It would be also be helpful if VISSIM modelling was carried out to show the interaction between these junctions and to assess their residual capacity levels and consequently identify any appropriate mitigation measures as required.

Cumulative Transport Assessment

The Introduction to the Environmental Statement (paragraph 2,13) states that:

“The cumulative impact of this development alongside the remaining development planned through the proposed allocations within the Local Plan Partial Review means that it is considered by CDC that this proposal is EIA development”.

The scope of the cumulative assessment is then set out in Section 5 of the TA and includes Oxford Gateway, the BSP application, the ‘PR’ sites and certain of the sites allocated by the Oxford Local Plan in the north of the city (SP24, SP28 and SP52). We note, however, that the ES or the TA does not yet include any commercial floor area that forms part of the PR8 Site Allocation, including the Planning Permission [INSERT REF] that relates to the expansion of the Begbroke Science Park. It is requested that the TA is updated to take account of the commercial uses approved and set out in the Site Allocation within an updated version of the cumulative assessment.

The planned development around London Oxford Airport or sites north of Oxford should also be included in the assessment.

Mitigation

The TA makes traditional assumptions about trip generation that do not appear to promote a more sustainable transport strategy and rely too heavily on car trips. We believe that the Proposed Development should consider additional measures that would help achieve a more ambitious mode share aspiration, that would secure a greater proportion of trips by more sustainable transport modes, such as public transport, cycling and walking. This would help ensure that the development supports a wider sustainable transport strategy that is consistent with the wider growth aspirations set out in the Local Plan.

This over reliance on car trips within the TA then leads to a mitigation package that primarily proposes introducing signalisation to the Cassington Road Roundabout, which in turn presents numerous flaws as a strategy: the introduction of signalisation assumes there is capacity to the south which we know to not be the case; and it does not conform to the County Council’s strategy of providing additional capacity for the movement of buses along the A44 through the provision of a south-bound bus lane. A more appropriate approach and response would be to properly model the network (using VISSIM modelling as we have suggested), and then demonstrate how improvements can be delivered that would allow buses to move past this queuing, thereby encouraging the use of public transport.

A more ambitious and sustainable transport strategy could be secured that would better facilitate the movement of people by non-car modes and be less reliant on social, transport and commercial



infrastructure (e.g., park and rides, supermarkets, schools, health centres etc.) from the existing area, or from the emerging PR sites. Such a strategy would be consistent with the District and County Council's aim of encouraging travel by non-car modes. This strategy would also help identify appropriate contributions to the delivery of initiatives for the wider active travel network.

Socio-Economic Effects and Social Infrastructure

The Socio-Economic Chapter (Chapter 6) contains no assessment of Cumulative or In Combination effects. Paragraph 5.14 notes that "Additionally, there is considered to be sufficient capacity available and emerging within secondary schools in the area.", but this is not supported by evidence, or without a cumulative assessment.

Chapter 19 then goes on to state in relation to Socio-economics that "Accordingly, the development will not have any material residual impact that has not been mitigated". Sufficient detail has not yet been included in the application, or contributions secured towards the delivery of any mitigation, to robustly demonstrate this assertion from the ES.

The Education Strategy Report, which is a stand-alone application document, reviews education requirements. This includes Section 5 on Secondary Education. It discusses whether a new secondary school will be required – which is included in the allocation PR8 at Begbroke – or whether school expansions might suffice. It concludes (para 5.9) that:

"Whatever decision is made about whether a new school is required, it is expected that some additional secondary school capacity will be needed, and that financial contributions will need to be secured through planning obligations."

We agree with this statement and consider that it would be justified and necessary for such contributions to be secured.

Cherwell District Council has been working with partners to undertake co-ordinated planning for Social Infrastructure across the growth sites in the District. This work looking at cumulative impacts needs to be reflected in the assessment to understand how impacts will be practically mitigated. It is important that there is a fair and reasonable mechanism in place to secure planning obligations, particularly where, for Secondary Education one allocation is required to provide the very substantial land area for a new school which will serve all allocations. We would therefore welcome the provision of more information, including an accurate and comprehensive assessment in the ES, so that partners can assess and plan for the delivery of essential infrastructure required to make planned developments collectively sustainable.

Summary

Whilst we fully support the principle of the proposed development, further environmental information is necessary before any application for planning permission could be approved. We wish to reiterate



our support for the Application and our shared desire to see it approved, subject to the further information we have set out above being provided. This information can be summarised as follows:

- i. **Sustainable Transport:** A mitigation package is formulated that is in line with the County Council's transport strategy. This should include further information relating to the sustainable transport strategy, which seek to demonstrate how the project would help contribute towards pedestrian and cycle infrastructure and a move away from private cars and improves options for active and public travel modes;
- ii. **Scope of the Transport Assessment:** That the scope of the junctions assessed should be expanded to include the Peartree, Wolvercote, Kidlington and Cutteslowe roundabouts and that a VISSIM model should be used to better understand the interplay between them;
- iii. **Cumulative Assessment:** That the cumulative assessment is expanded to include developments around London Oxford Airport and in the north of Oxford, and that an additional 45,000sqm of BSP floorspace is included in the assumptions for PR8; and
- iv. **Cumulative socio-economic effects:** more information in relation to the potential cumulative socio-economic effects of the development are required, including an accurate description in the ES, so that partners can assess and plan for the delivery of essential infrastructure required to make developments collectively sustainable, along with a fair and reasonable mechanism in place to secure planning obligations.

Without the above we consider the application does not provide sufficient information regarding the potential impacts of the proposed development, which would mean that there is not sufficient certainty that it provides adequate mitigation. We are therefore of the view that the application as submitted does not meet the requirements set out in paragraph 110-113 of the National Planning Policy Framework 2021. We would ask that the applicant is requested to correct these deficiencies before the proposals are determined.

I trust that the above is helpful in your consideration of the Application. Should you require clarification on any of the points raised, please do not hesitate to contact me.

Yours sincerely

Matthew Sharpe
Board Director

enc.

cc. Tom Clarke (OUD)
Sebastian Balcombe (OUD)