

From: Members of the Rowel Brook WhatsApp Group and residents using local Public Rights of Way.

Dated 19th January 2024

Re: [23/02098/OUT](#)

Outline application, with all matters reserved, for a multi-phased (severable), comprehensive residential-led mixed use development comprising: Up to 215,000 square metres gross external area of residential floorspace (or c.1,800 homes which depending on the housing mix could result in a higher or lower number of housing units) within Use Class C3/C4 and large houses of multiple occupation (Sui Generis); Supporting social infrastructure including secondary school/primary school(s) (Use Class F1); health, indoor sport and recreation, emergency and nursery facilities (Class E(d)-(f)). Supporting retail, leisure and community uses, including retail (Class E(a)), cafes and restaurants (Class E(b)), commercial and professional services (Class E(c)), a hotel (Use Class C1), local community uses (Class F2), and other local centre uses within a Sui Generis use including public houses, bars and drinking establishments (including with expanded food provision), hot food takeaways, venues for live music performance, theatre, and cinema. Up to 155,000 net additional square metres (gross external area) of flexible employment uses including research and development, office and workspace and associated uses (Use E(g)), industrial (Use Class B2) and storage (Use Class B8) in connection with the expansion of Begbroke Science Park; Highway works, including new vehicular, cyclist and pedestrian roads and paths, improvements to the existing Sandy Lane and Begbroke Hill road, a bridge over the Oxford Canal, safeguarded land for a rail halt, and car and cycle parking with associated electric vehicle charging infrastructure; Landscape and public realm, including areas for sustainable urban drainage systems, allotments, biodiversity areas, outdoor play and sports facilities (Use Class F2(c)); Utility, energy, water, and waste water facilities and infrastructure; together with enabling, site clearance, demolition and associated works, including temporary meanwhile uses. The Proposed Development affects the setting of a listed building and includes potential alterations to public rights of way. The application is accompanied by an Environmental Statement

Dear Andrew Thompson

I write on behalf of a group of Begbroke residents living next to the Rowel Brook, and other residents who use and enjoy the local Public Rights of Way, including those alongside the Brook. We are pleased to be able to comment at this outline planning application stage of the Begbroke Innovation District and would like to take the opportunity to request some further information. This is as follows:

We note that the updated Outline Landscape Ecology Management Plan (November 2023) states that the southern area of the proposed Rowel Brook Park is ‘to be improved to deliver public open space and high-quality walking and cycling routes, and new habitats and enhanced biodiversity’:

1. Given the anticipated increase in footfall, dogs, and cyclists, what practical measures will be implemented to ensure the protection of a wild and natural state, thereby enhancing faunal biodiversity?
2. We have noted the proposal for buffer zones. What is the expected minimum depth of these zones, and how will they be safeguarded from public access that could negatively impact the habitat and biodiversity?
3. The plans fail to acknowledge that the main course of the Rowel Brook has been illegally obstructed, leading to a significant decrease in flood mitigation capacity by reducing utilisation of the downstream ponds (see attached map).
4. The plans do not recognise that the course of the Rowel Brook has been unlawfully reduced by two half pipes installed under 2 footbridges without the required regulatory approvals (Environment Agency reference THMGE16524), resulting in a substantial reduction in flood mitigation capacity.

5. The provision for the Rowel Brook Park does not consider the additional drainage of surface water from the three northern sectors of the new development directly into the Brook, which will significantly increase the short-term flood risk. The plans do not reflect the location of the significant swale proposed for the north/north-east border before the Brook.
6. The plans do not include the removal of silt between the blockage of the main course of the Brook and the railway underpass.
7. The plans do not specify the minimum number of suitable bat boxes, nor how many are to be situated on existing trees or planned to be erected every five years as the new belt of trees mature. There are 70 potential trees, 2 high, 9 moderate, and 59 low potential listed in the ecology report.
8. Whilst the Emorsgate seeding descriptions are encouraging, the plans do not specify the minimum planting and landscape required to support various bat and bird species, including the insects on which swifts will feed.
9. The plans do not clearly specify the minimum number of bird boxes, type of boxes (robin, owl etc), nor how many are to be situated on existing trees or planned to be erected every five years as the new belt of trees matures.
10. The plans do not specify the minimum provision of landscaping required to provide natural habitats for reptiles that are flood-resistant.
11. The plans do not adequately describe how the proposed Green Infrastructure Perimeter will effectively replace the north-south link lost by the removal of the hedgerows that link Rowel Brook south via Begbroke Science Park to Sandy Lane.
12. The plans do not provide an estimation of the anticipated budget required for the initial and subsequent years to deliver the minimum specification, nor do they assess the feasibility of securing the necessary funding.

On a more positive note, and as we move forwards in the planning process, we would like to offer the following comments:

1. We appreciate the opportunity to collaborate as local residents with the Oxfordshire Bat Group to inform a sustainable bat diversity plan. ES Vol 1, Chapter 13_Ecology_August 2023 cites the CDC Ecology Officer as a consultee, stating that she does not know the site particularly well. We would be pleased if she could arrange a visit with us and provide advice on practical measures we can take to enhance opportunities for these species in terms of specifications for light pollution dark corridors, noise pollution, improved roosting, and enhanced bat foraging. We acknowledge the Bat Box recommendations within the document. Your facilitation of a meeting would be appreciated
2. We frequently hear the calls of male and female Tawny Owls and would like to solicit input from the Ecology Officer regarding opportunities to attract a breeding population of Owls. An evaluation of the suitability of the current and proposed habitat, along with recommendations for the location and type of breeding box, would be beneficial. Given that Barn Owls inhabit land across the A44, it would be advantageous to identify and enhance suitable habitat locations on the wider site to attract them.
3. We welcome the minimum specifications for the proposed habitat that will attract and support vole populations, including water voles.
4. Hedgehog access spaces need to be 13cm, not 10cm
5. The plans should detail the construction mitigation steps including safe zones that permit early implementation of biodiversity plans, including tree planting.

6. The positive management of ponds should be extended to include the removal of silt from the blocked main course of the Brook, enhancing the ability to mitigate against climate change impacts such as flooding and drought.
7. The two footbridge drains that block drainage and were installed without Environment Agency permission (Environment Agency reference THMGE16524), and should be replaced.
8. The ecological proposals for the northern eastern border of Rowel Brook should include the proposed large swale for this area, such as a wetland marsh to promote biodiversity and mitigate flood risk.
9. A plan should be implemented to check for contamination and clear rubbish from the site as it was previously an area of industrial activity, such as the Weed Research facility.
10. A plan should be developed for the sustainable control of bramble and other invasive species from Rowel Brook Park.
11. Draft performance metrics for the successful contractor should be established and communicated to stakeholders including local community representatives, along with a risk escalation plan if the delivery of the final LRMPs is not met due to contractor failure based on breaching legal requirements.
12. The plans should be prioritized based on the benefits to biodiversity, and the minimal recommendations defined in the event that they cannot all be funded.

In addition, with the designation of Oxford as a Swift City, and Begbroke sited firmly in the catchment of The Cherwell Swifts Conservation Project, we are especially keen to draw attention to the plight of Swifts and how the Begbroke Innovation District offers an opportunity to conserve these birds and potentially attract national recognition of outstanding conservation practices for both OUD and CDC. And so:

We are pleased to see there is provision for integrated Swift bricks, but there are nowhere near enough and as swift bricks can be installed at 5metres or higher, they should be included for two storey units/dwellings as well as the three storeys proposed. The full application should include at least bricks at the rate of 1 per new dwelling of 2 or more storeys. This would accord with CDC Guidelines. This would fall within the British Standard BS 42021:2022 which you could implement as an alternative, as it provides thorough guidance of placing and grouping.

There is huge public awareness, and support, about the need for swift bricks due to a national campaign, asking the government to mandate swift bricks, which was launched in 2022 by an Oxford based conservationist. Her government petition secured almost 110,000 signatures and was covered widely across the [media](#) (national newspapers and television). It gained cross party [political support](#) including from the former Housing Minister Kit Malthouse MP who had included guidance about swift brick in the NPPG in 2019 but with hardly any uptake, concluded strongly that mandating was essential. Then Lord Goldsmith tabled an amendment in the House of Lords which was again, hugely supported. Out of 455 LPAs, only 9 have conditions on swift bricks and while 30 or so more have guidance, nowhere near enough swift bricks are being installed. The Secretary of State is currently considering mandating but the current government recommendations is that LPAs add their own compulsory measures, following the example of the likes of Brighton and Hove and Exeter City Council.

Without swift bricks there is no safe, permanent nesting habitat for swifts anywhere in Britain due to national scale loss of natural cavities (thanks to demolition, countless home repairs and the nationwide push for insulation). No cavities exist in modern

buildings either. Furthermore, swifts and the other 3 species of red listed cavity nesting birds are not protected species meaning there is no formality in place from ecologists etc. This reality combined with the concerning and rapid decline of swifts means that there is a need for a clear, consistent and urgent national instruction (according to the British Trust for Ornithology the breeding population in the UK has declined over 60% since 1995 and is down to fewer than 50,000 pairs. By 2025 the projection is 40,000 pairs).

And finally, as a group, whilst not part of the planned Rowel Brook Nature Park, we also wish to comment on plans for the proposed **Central Park**, as follows:

1. We would appreciate the opportunity to work with the Ecology Officer as the nature of the field (Central Park) seems to have been somewhat overlooked. A resident living next to the site named Central Park notes that it is quite species rich due to the nature of the surrounding strip of woodland and the extensive nettles, grasses and brambles grown in summer making it quite impassable and thus protecting wildlife.
2. Kestrels, Red Kites and Buzzards have regularly been seen hunting in the field.
3. There is an abundance of rabbits that attract foxes, badgers and polecats (which have come into the garden from the field).
4. There are families of Muntjac deer along with Roe deer.
5. Less recently there have been Jays, Green Woodpeckers, Greater Spotted Woodpeckers, Yellowhammers, Pheasants, Partridge, Starlings, Song Thrushes.
6. Bats – the resident has lived there for 30 years, and there have been bats flying around both gardens and into the field (Central Park) – the location of the roost is unclear, but there is a definite bat corridor to the Begbroke farmhouse. It is noted that this will be protected.
7. Skylarks - there has been a noticeable increase in the number of breeding pairs over the last several years in the fields surrounding Central Park field. We share a concern about the displacement of the breeding pairs.
8. Damson hedge - there are quite a few damson trees along the side of the field which provide food for numerous insects, birds and mammals, and should be retained

We look forward to your responses

Yours sincerely,

Eileen Anderson

On behalf of Members of the Rowel Brook WhatsApp Group and local residents listed below.

Cllr Malcolm Ryder, Cllr Dorothy Walker, Cllr Nigel Simpson, Cllr Lesley McLean, Cllr David Wintersgill, Allan Todd, Cllr Les Allen, Cllr Lindsay Gregory, EJ Errol, Luke Middton, A and E Anderson, Bogdan Sava, Cllr Fiona Mawson, MK Javid, C Javid, Jane Jackson, Ruth Davies, Ellis Davies, Michael Hill, Elizabeth Hill, Katrin Magorrian, John Maggorian

Overleaf: Map of original Rowel Brook flow

