

23/03428/OUT - Outline planning application for the construction of up to 140,000 sqm of employment floorspace (use class B8)

The Banbury Civic Society wishes to make the following comments following the submission of OCC's objection to the above application.

We would support OCC's objection, which was made for the following reasons:

- *The site is in an unsustainable location for walking and cycling.*
- *The proximity of the access roundabout to M40 Junction 11 is likely to lead to severe congestion and potential safety issues arising from queuing on the M40 off slip.*
- *Any further development around Junction 11 of the M40 will add to the severe congestion and air quality problems on the A422, particularly along Hennef Way – this development does not demonstrate how it would mitigate its impact on these issues through adequate sustainable travel connections or by highway improvements.*
- *Safe and suitable operation of affected highway junctions has not been demonstrated as full input and output details of the Vissim analysis have not been provided as part of this application, and errors have been identified in the details that have been submitted.*
- *Based on the current modelling results, the proposed signalisation of the A361 does not mitigate the impacts of development.*
- *It has not been demonstrated that a signalised crossing of the A361 for pedestrians and cyclists may be incorporated at a safe and suitable location, and an appropriate access into the site is not proposed.*

We would nevertheless take issue with the measures that OCC consider sufficient to mitigate the transport impact of the proposed development through the issuing of a S106 agreement, including an obligation to enter into a S278 agreement, as set out in the table below:

S106 Contributions

Contribution	Amount £	Price base	Index	Towards (details)
Strategic Transport (1)	970,709	March 2019	Baxter	A highway improvement scheme to relieve congestion on Hennef Way
Strategic Transport (2)	To be confirmed		Baxter	Delivery of the A422 to Overthorpe Road link road, or alternative scheme
Public transport services	600,000	May 2022	<u>RPI-x</u>	To establish a bus service to the site
Travel Plan Monitoring	34,210	April 2023	<u>RPI-x</u>	Monitoring of the Framework Travel Plan and the ten subsidiary Travel Plans
Admin Fee	To be confirmed			Administration of the S106
Total				

Whilst this Society has long advocated a South East Relief Road for Banbury, we have long objected to any *A422 to Overthorpe Road link road* to the east of the M40, because:

- of its impact on land of High landscape value (Oxfordshire Historic Landscape Characterisation Project [Chapter5CaseStudies.pdf \(oxfordshire.gov.uk\)](#), 5.3.4.2 - Capacity for Change: Banbury Study Area (see plan at the end of this letter))
- of its impact on the settlement of Nethercote,
- it would open up further land east of the M40 to further intrusive 'big shed' development,
- we are not aware of any modelling studies that show that such a link would have any significant impact on existing congestion on Hennef Way and Junction 11, and
- we are not aware of any modelling studies that show that such a link would mitigate the transport impacts of the proposed development.

The Local Plan Inspector was unequivocal regarding the mitigation that would be required for a large B2/B8 development at the proposals site:

- 202. ... **Moreover, there are acknowledged barriers to delivery of the whole Ban 15 site at J11 (that's the greater BAN 15 then including the proposed development site), including that the traffic movements likely to be generated would trigger the need for the new South East relief road through the town.**
- 203. **In addition, for the whole site to be developed as a mainly road based B2/B8 employment scheme, major contributions are likely to be necessary to other Cherwell District Council Local Plan transport and highway improvements, especially to the motorway junction itself. There is no clear evidence that an acceptable programme of works could viably and practically be delivered, taking into account the impacts of other developments committed in the plan.**
- 206. **In the light of the above, only the land west of the A361 (i.e BAN 15 - today's Frontier Park) should be allocated for new employment development in the modified plan and none of that to the east of the road, even as a strategic reserve site. This would have the considerable benefit of reducing the very harmful landscape and potential environmental effects of the wider scheme on a main entrance to the town from the north, south east and east, as well as that on the largely rural landscape of the locality.**

If we are to ever accept this *A422 to Overthorpe Road link road*, it has to be:

- only as part of a full South East Relief Road (from Bankside to Jct 11) that meaningfully relieves congestion in the town centre, and
- only if Huscote Farm and the Nethercote fields are protected in perpetuity from intrusive built development.

Anything less is simply an industrial artery that opens up further land east of the M40 to development on a truly massive scale, with no benefit to the town centre or the wider public. Indeed, plans have already been aired publicly in the Banbury Guardian that show the *A422 to Overthorpe Road link road* with large scale B2/B8 industrial development alongside.

Notwithstanding that LTP4 mentions the *A422 to Overthorpe Road link road*, the Local Plan Inspector was insistent that B2 or B8 development on the proposed development site would result in "**very harmful landscape and potential environmental effects... on a main entrance to the town from the north, south east and east, as well as that on the largely rural landscape of the locality**" and that "**the traffic movements likely to be generated would trigger the need for the new South East relief road through the town**".

We would thus maintain our objection to OCC's proposed mitigation of the *A422 to Overthorpe Road link road*, until it can be shown:

- 1) That traffic modelling demonstrates that the *A422 to Overthorpe Road link road* will have any useful effect on congestion and air-quality on Hennef Way,

- 2) That traffic modelling can be shown to demonstrate that OCC's proposed mitigation (including the A422 to Overthorpe Road link road) will be adequate to mitigate all transport impacts of the proposed development, and
- 3) That the capacity of Hennef Way and Jct 11 cannot be improved by other means, for example, doughnutting the Wildmere / Ermont Way and Jct.11 roundabouts and adding lanes, as has been done to very useful effect on Oxfords southern bypass.

Yours sincerely

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(Chairman, Banbury Civic Society)

Address supplied

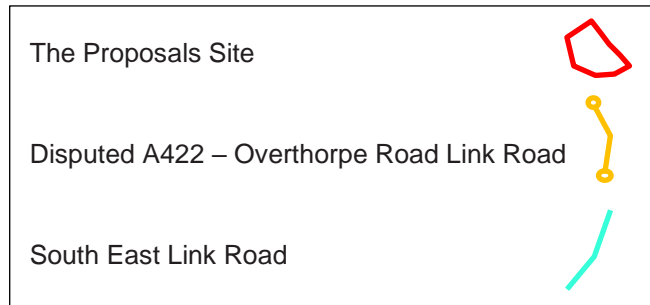
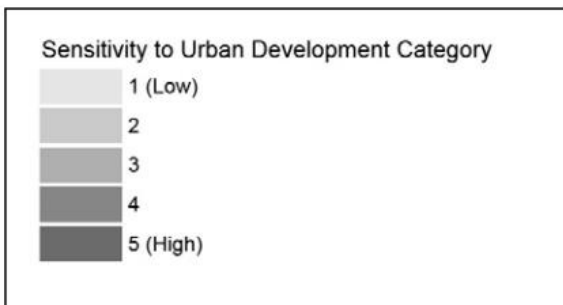


Figure from Oxfordshire Historic Landscape Characterisation Project [Chapter5CaseStudies.pdf](#) (oxfordshire.gov.uk), 5.3.4.2 - Capacity for Change: Banbury Study Area, showing both the proposals site (outlined in red) and the land at Nethercote that would be affected by the disputed A422 – Overthorpe Road link (shown in gold) as areas of “Medium / High (4) Sensitivity to Urban Development”. Note: this excludes land in Northamptonshire (on the right of the map) that is of at least equal sensitivity to urban development.