

Weston Front

**Response to consultation on proposed eco-town PPS
and to Weston-Otmoor sustainability assessment**



Dated 27th April 2009

Contents

| <u>Section</u> | <u>Pages</u> |
|---|---------------------|
| 1.0 Introduction – about Weston Front | 2-3 |
| 2.0 ‘The big picture’ – comments about the PPS | 4-10 |
| 3.0 The sustainability appraisal for Weston-Otmoor | 11-21 |
| 4.0 Conclusions | 22 |

1.0 Introduction – about Weston Front

Weston Front is a small non-incorporated campaigning organisation, whose aim is to campaign against the so-called ‘eco’ town proposal by developers Parkridge at Weston Otmoor in Oxfordshire. The group has a committee that meets regularly and which, since November 2007, has sought to co-ordinate and articulate a local response as a third party to the proposal. Committee members include local residents, representatives from the Bicester Chamber of Commerce, local parish and district councils, those who have professional interests as planners, architects, and lawyers, and those with a particular interest in environmental issues and organisations such as BBOWT and CPRE.

In a poll of residents in and around Central Oxfordshire conducted by the developers, 86% of those polled rejected the proposals. For this reason, Weston Front has a robust claim to represent the views of about 20 local villages, including the large village of Kidlington (population 15,000) 10km north of Oxford, and the interests of the business community in Bicester.

Weston Front believes it is important to challenge the process by which the proposal for a new town at Weston-Otmoor has been developed, as well as the specifics of why we believe a) that this is an inappropriate site for development, and b) the plans put forward by Parkridge would severely damage the immediate area affected by the development, and the wider sub-region. We draw your attention to the submission Weston Front made to the changes proposed by the Secretary of State to the SE Plan, and our response to the developer’s transport proposals, submitted to Mr Henry Cleary from the DCLG.

As a third party organisation, Weston Front has been a consultee at various stakeholder briefing meetings, but has generally struggled to obtain the information we require in order to make an informed technical response to the shortlisting process, of which this consultation on two specific documents is but one part. On the contrary, the whole process has, in our view, been invalidated by the patchwork release of the sustainability assessment and draft PPS before the reports that were needed to inform any robust sustainability assessment.

These various viability and impact reports, in their turn serve a myriad of different purposes, with varying types of data input, ranging from those that have been almost completely derived from developer supplied data, such as the Transport Assessment Report produced by consultants Halcrow, and the Financial Viability report supplied by PricewaterhouseCoopers, to those where publically available statistical evidence was combined with data from wider sources, as was the case with the ARUP report on the Social and Economic Impacts of the scheme.

Our intention is to structure our comments as far as possible to take into account the process as we now understand it, and to draw together, insofar as it is possible, the evidence from the various viability and impact reports. Additionally, we add our support to the responses made by Cherwell District and Oxfordshire County Councils, and CPRE, which we fully endorse.

Our overall response to the consultation is that:

- 1) We are not convinced by the need for a separate PPS into this area of policy.
- 2) The existing draft fundamentally undermines the plan-led approach and planning framework, particularly in respect of incorporating a series of shortlisted sites. The intention of providing a shortlist would be to afford them 'material consideration' advantages over non-designated sites, and this is incompatible with a plan-led approach.
- 3) We believe that the overall thrust of the sustainability appraisal is correct in respect of Weston-Otmoor, in that it is indeed a poor location. We seek an explanation as to why the site evaluation unaccountably changed from a 'D' rating to a 'C' rating at a late stage.
- 4) Although we agree with the sustainability appraisal's thrust, we believe it is flawed in that it was published before taking into account the findings of six other reports investigating aspects of the impact and viability of the Weston-Otmoor proposals. These provide even more damning evidence against the Weston-Otmoor proposal. Given the poor level of detail supplied by Parkridge it is also the case that the methodology of seeking views from the various organisations listed as being early consultees within the methodology does not lend much to the authoritative weight that this document lacks, given its intended use to inform which proposals will go on to form eco-towns programme.

2.0 Comments about the PPS and ‘the big picture’

We would want to make it clear that Weston-Front is not a NIMBY organisation. From a very early stage the group has been keenly aware of the need for more housing, and particularly affordable housing, both nationally and in Central Oxfordshire. We are aware that the prime drivers for this need are 1) a growth in the number of households due in part to higher divorce rates, and smaller household sizes, 2) an increase in life expectancy, and 3) immigration, both from other parts of the UK to the South East, and from abroad. Some of our constituent committee members have sought follow-up meetings with Shelter, for instance, precisely to articulate viable alternative schemes.

In the *Eco towns, living a greener future: progress report* document published in July 2008, the length of the housing waiting lists for Cherwell District were cited as 3,420, and for Oxford City 3,970.

We fully appreciate that those figures represent a challenge, and, in our response to the Secretary of State’s proposed changes to the SE Plan we endorsed her view that the percentage of affordable homes within the housing mix for Central Oxfordshire should be set at 40% (recommendation 22.6), 10% higher than that contained in the non-statutory adopted Local Plan.

We also fully appreciate that it is in part the failure of local councils to deliver new housing in line with statutory targets that has prompted a rethink by central government as to how to meet unmet housing need. Although the contribution to the national housing need that could be made by eco towns is relatively small, we agree with the opening comment of the preamble to the PPS that ‘*Communities across the country are facing critical challenges, including the provision of affordable housing and the ability to respond to the serious threat from climate change.*’

Where we begin to disagree with the preamble, and the eco-town prospectus, is in Section 8. We do not agree that ‘*A key characteristic of an eco-town is that it must be a new settlement*’ No evidence is put forward to support that claim. Neither do we accept that the list of benefits set out as (a) to (g) in the same section necessarily apply.

Q1 Does the draft PPS provide sufficient guidance on the consideration of eco-towns through the plan making process?

No. It is precisely because eco towns do not exist in isolation that we do not consider that the PPS provides sufficient guidance. Across Oxfordshire, there is an ongoing need for growth in several of the country towns, particularly Bicester, in order to deliver higher order services and facilities and generate more self-contained communities. Additionally, there is a need to regenerate the centre of Kidlington in order to reverse its relative underperformance in terms of footfall, rent and yield compared to other outer-Oxford settlements. This means drawing in additional housing and investment to improve the retail offer, extend the range of local facilities, and improve the village centre environment.

In the case of the Weston Otmoor proposal any potential advantages of having an eco-town need to be weighed against the likely disbenefits to existing inter-related local

settlements. In this case, the ARUP report quite clearly cites the negative impacts on Bicester and Kidlington as outweighing any benefits. It concludes that the Weston-Otmoor proposal is counter to regional policy.

The Introductory preamble to the PPS fails to address all of the potential interactions that need to be taken into account, listing only those that are positive. Similarly, the PPS makes no mention of how planners should assess the possible disadvantages of the proximity of an eco-town in respect of other settlements, whilst being obliged to accord a positive assessment based on proximity to other settlements and good transport links, as well as existing and planned employment opportunities (PPS 3.2 (a), (b) and 4.1). Material weight is also given to the fact that a location forms part of *'the eco-towns programme'* (PPS 2.2, 3.2 (d)) and in paragraph 2.6 the separateness of the eco-town programme from the development plan is further emphasised. *'...the development plan remains the starting point for the determination of these planning applications – unless material considerations determine otherwise.'* Being part of the eco-town programme is a material consideration, therefore the development plan is not the starting point. This is not a plan-led approach.

This means that a local authority trying to assess the implications of a scheme such as Weston Otmoor against wider planning considerations already has its hands tied. The positive weighting for an eco-town within the programme disadvantages an alternative development that might be a better, more sustainable scheme. Local planning authorities would find it hard to resist what would, in effect be a loaded die in favour of a worse option.

Q2 Are the locational principles for eco towns sufficiently clear and workable?

No. As we have set out above, the principles are loaded in favour of any site designated to be within the eco-towns programme. Far from allowing authorities to assess a designated site against other options within a plan-led approach, all of the criteria set out in paragraph 3.2 suggest that proximity to another settlement is 'a good thing', but fail to provide an opportunity to weigh what may be an advantage for the eco-town against the disbenefit to nearby settlements. We fundamentally disagree with the assertion in paragraph 4.1 that *'Eco-towns are most appropriate when they are near to and well-connected to existing settlements, particularly major centres of employment, retail and leisure.'* This may be true for some of the shortlisted locations, but it is a mistake to over-generalise. Sited 3 miles from Bicester, and 4 miles from Kidlington, the proposal for Weston-Otmoor would undermine the whole regional strategy for restoring the self-containment of Bicester through extra housing and employment. It would lead to a duplication of middle-order facilities, but fail to deliver the Bicester Vision to create a tipping point allowing Bicester to develop higher order facilities of its own. The ARUP report sets the implications for Bicester and Kidlington in great detail.

Additionally, the provision of untried, vastly expensive transport mitigation schemes, as is the case with the Weston-Otmoor proposal does not mean that transporting a sizeable population by train, and then transferring half of them to bus services nearer Oxford equates to an eco-friendly lifestyle. Indeed we would argue that the need for such out-commuting constitutes *'unsustainable commuter trips'* (4.11) even if they aren't by private car. This is particularly the case where the train-tram scheme proposed conflicts with the viability of the more strategically important proposed

Chiltern Rail Oxford–London express scheme, and the inter-urban nature of the East-west Rail Partnership proposals.

Q3 Taking overall the standards set out in the draft PPS do you think that they achieve a viable eco-towns concept?

We do not see how an eco-town development, with infrastructure and 40% of land as designated green areas (for cycle routes, allotments, etc.) will differ significantly from a non-designated scheme, which by 2016 will need to make use of a parallel set of standards in order to achieve carbon neutral status. In many ways, having a separate PPS to define the standards of eco-towns undermines the intention to implement CSH Level 6 by 2016 and to describe how it might be achieved across the board for all major developments.

Q4.1 Do you consider that the standards provide a clear basis on which to make decisions on planning applications for eco-towns?

No. We consider that adding a distinctive PPS concerned exclusively with a separate eco-town programme adds confusion and builds in potential conflict with other policy statements and regional guidance on other proposed development. The assertion in paragraph 12 of the Introduction that the standards used to define an eco town *'do not repeat existing planning policy'* also suggests a dual-standard approach to development. Planners and developers are bound to ask, *'Which takes priority, the sub-regional 40% affordable housing target, or the minimum 30% target set out in paragraph 25?'* The wording in introductory paragraph 12 is vague and unhelpful. It states *'Where local planning authorities, have up-to-date "development plan" policies on the provision of affordable housing these may be applied to an application for eco-towns where the local need is higher than the minimum 30%.'*

The permissive *'may be applied'* is particularly unhelpful. How can a local authority, such as Cherwell, with a non-up-to-date LDF set at 30% effectively implement the 40% requirement set out in the RSS, when both the existing local policy and the proposed PPS set out a 30% minimum? Likewise, a developer forced to comply with a locally approved 40% affordable housing ratio three miles down the road at Bicester would argue that this higher target would be unfair, particularly as we are assured that planning authorities will be able to offset eco-town housing numbers against sub-regional targets, therefore effectively rendering a 40% target optional and therefore unworkable.

In the PPS itself, there is no repetition even of the content of Introduction paragraph 12. Paragraph 2.2, concerned with RSSs covers the approval of eco-town proposals in a more general way. So the ability of planning authorities to impose the higher regional spatial strategy affordable housing target is weakened still further. It needs to be spelt out far more clearly that in instances where the RSS sets out a higher percentage of affordable housing that it takes precedent over the draft PPS. Likewise, local planning policy, where that sets out what the housing mix of affordable housing should be (i.e. socially rented versus intermediate schemes), it should be a material consideration. After all, there is no point in delivering a scheme which proposes 225 socially rented properties out of 15,000 dwellings if the main identified local need is for socially rented properties. This is the case at Weston-Otmoor. Doubtless the housing mix is so unbalanced because of the need to retain sufficient cash to fund the necessary transport infrastructure, but the scheme would not reduce the housing

waiting lists in Cherwell District or Oxford City as was promoted in the *Eco towns, living a greener future: progress report* document as a core reason for shortlisting it.

Q4.2 Do you consider that the cost of implementing the standards will undermine the viability of eco-towns?

Our main concern is not so much the cost, but that the standards set out at the outset of schemes could easily unravel, whatever covenants are placed on the community governance bodies. Section 4.13 (a), for example, sets out that '*Planning applications should include travel plans which demonstrate: (a) how the town's design will enable at least 50 per cent of trips originating in eco-towns to be made by non-car means*'. The key words here are 'travel plans' and 'enable'. Essentially this lets everybody off the hook. In the case of the Weston-Otmoor proposals, the travel plan assigns 63% of all trips to be internal to the town itself. The outbound trips are determined on the basis of restricting Passenger Car Unit movements to 1,500 per hour through a single egress route by 1) punitive charges equivalent to a fee of £7,000 per year on peak movements (County Council report Annex E p23 February 2009), and 2) signal-controlled junctions. By supplying a combination of trains, train-trams, and buses the remaining journeys can be made. But, as the Halcrow report into transport pointed out, even the developer's preferred model suggested that some 7% of trips would be suppressed and 4% would be queued (thus reducing the quota allowed out in the following hour). However, were this punitive regime to be relaxed, but without reducing the level of public transport provision, it would still meet the requirement to *enable* 50% of trips to use non-car modes, and in any case, the developers have fulfilled their obligation by demonstrating how it *could* work within a 'travel plan' document. In other words, it is a pre-build statement of what *could* be achieved rather than anything more substantial or long-term.

Q4.7 Should the PPS be more prescriptive than set out in paragraph 4.9(e) in relation to energy efficiency? Do you agree that 70 per cent is an appropriate level of carbon mitigation through on-site means?

We welcome the intention to raise the standard of energy efficiency in the fabric of buildings. We do not see the need for a separate PPS to enforce the Building for Life and Code for Sustainable Homes standards that will apply at the time permission is granted. We consider it unhelpful that in 4.9 (a) Level 4 of the CSH is set out as being modifiable '*elsewhere in this Planning Policy Statement*'. That requires a modification each time the Building Regulations are amended in respect of the code. It would be easier to refer to the prevailing Building Regulations generally, and set a minimum Level 4 standard if the intention is to prevent future governments watering down the commitment without it being readily spotted.

Q4.8 Is this employment standard sufficiently clear and workable?

Our view is that the standard of one job per household is an under-representation of actual need. We are aware that this is a widely applied standard, but comparing like with like, and allowing some reduction for self-employed individuals either working from home or not requiring a fixed 'base', our calculation based on Bicester's 2001 census data was that 19,610 jobs would be required for a population of 35,000. That leaves a shortfall of 4,610 jobs. We have used Parkridge's assumptions that a third of all jobs would be taken by non-resident in-commuters, which notionally results in 9,610 residents needing to out-commute (a higher ratio if the ARUP report's conclusions that jobs will lag behind housing are correct).

This begs the question, also set out by Cherwell and Oxfordshire about what *'unsustainable commuter trips are kept to a minimum'* (PPS 4.11) means, and, our point made above, that reducing the need to travel is as important as ensuring that it's not done by private car.

Q4.9 The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable?

It is interesting that the Mobility Unit of the Department of the Environment, Transport and the Regions produced guidance as early as 1994 setting out that optimal distances between bus stops should be around 400m, or 5 minute's walk, and that Transport for London's *Accessible bus stop design guidance* 2006 says that in busy areas these distances should be reduced further. This contrasts with the guidance for what are supposed to be exemplar settlements. We feel that the *'homes should be within ten minutes' walk of (a) frequent public transport'* is setting the standard too low, so low that for some, particularly for the mobility impaired, choosing to walk 800m to access public transport is not the first or even a possible choice.

Please see our comments on paragraph 4.13 within our response to Q4.2. Additionally, we agree with the local authorities' comments concerning the carbon impact of inbound and outbound commuting.

Paragraph 4.15 refers to the incorporation of electric car schemes. We note that in the case of the Weston Otmoor proposal, at peak hours it is intended to couple together the train-trams to Oxford, resulting in 75m long trains passing through the pedestrianised centre of the town. The wording needs to be extended in 4.15(b) to prevent schemes being introduced which effectively act as obstacles and generate congestion through otherwise pedestrian priority zones.

Additionally, the wording of 4.15(b) should not be set exclusively within the parameters of a discussion on the incorporation of electric cars. Our concern is that the scheme in general should not lead to congestion on the local or strategic road network, i.e. beyond the immediate boundaries of the town as envisaged in 4.14. The current wording suggests that the term 'local' refers exclusively to the road network within the town. It is, for instance, no great eco-achievement if, from Weston-Otmoor 50% of inbound and outbound journeys are made by public transport if the A34 and M40 are blocked for two hours each day by the other 50%.

The standard does not include access and egress arrangements for emergency services. In the Weston-Otmoor proposals, the single road in and out could easily get blocked, especially as queueing to exit is built in to the system of disincentives for car use. The standard should ensure that the number of access routes is appropriate to the size of the community.

Q4.10 The local services standard allows flexibility to reflect existing local provision and the size of the development. Does it cover the essential services which will be needed in eco-towns?

There is a conflict here because the wording talks about the 'well-being, enjoyment and health of people' in general. In the Weston-Otmoor proposals the developer has offered to restrict the provision of convenience superstores so as not to compromise

the viability of the proposed redevelopment of Bicester Town Centre, and, to a lesser extent, the retail offer at Kidlington. However, there is a consequent conflict of interests here between prospective residents of the proposed eco-town and those in the adjoining retail centres. It should be clear that the new development should not proceed if it were established that in doing so it would impact on the vitality and viability of neighbouring centres. There is no mention of the provision of land for religious buildings specifically. Is this incorporated within the more general 'community facilities'?

Q4.11 The standards proposed on green infrastructure and biodiversity aim to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefit of both people and wildlife. Are these standards reasonable and deliverable?

Like the representation made by Cherwell District and Oxfordshire County Councils we welcome the inclusion of the provisions set out in 4.20(a) and (b) in respect of protection of nature conservation sites and SSSIs. However, we have grave doubts about what is meant by terms such as 'significant adverse effect' the effectiveness of a 'strategy' for conserving and 'appropriate mitigation and/or compensation measures.' In the case of the SSSI sites that form part of and adjoin the Weston-Otmoor proposal, we cannot see how the water table could not be affected by the provision of 15,000 homes and accompanying infrastructure in the immediate vicinity. We are also concerned that the original reasons for designating these sites with SSSI status have long since served a broader purpose of protecting both wetland flora, and the fauna they attract. Establishing dense development around their edges will impact on flight lines for birds. Noise, not least from the proposed train sidings and the train-tram depot, will impact on breeding patterns. In other words, it should be clear from the guidance that the assessment of impact on these sites should not be restricted to the management of the sites themselves, but to the likely impact from surrounding development.

Paragraph 4.18 provides examples of the multifunctional use made of the space. It suggests that land should be 'accessible for play and recreation'. The guidance should be modified to take into account the vulnerability of some sites to human presence, making it clear that exclusion of the general public will be an appropriate means of managing and protecting some sites.

We are particularly concerned about the loss of green belt land to non-residential construction. No mention is made within the standards of the relationship between the 40% ratio and green belt designation. If a designated site is large enough to include a significant proportion of SSSI wetland and green belt land then it leads to the conclusion that the remainder of the site, including the residential area is likely to benefit from well below 40% green infrastructure provision. There should be guidance as to its appropriate distribution within large sites.

Additionally, we consider that detailed guidance should be provided concerning appropriate use of the green belt for transport infrastructure. In the case of Weston-Otmoor the addition of a 6 platform rail station, extensive sidings which would not be available at Oxford, a train-tram depot and a 6,000 space Park & Ride is a major incursion into green belt land. According to the Halcrow report into transport, the Park & Ride would be used by only 100 commuters into Oxford, the remaining users

would be in-commuters with some spaces designated as 2–3 car family resident overspill. This infrastructure is clearly primarily aimed at facilitating transport into and out of the proposed town. It should not, therefore be confused with developments that contribute towards maintaining the openness of the Oxford green belt (PPG13 Appendix E, paras 3.16–3.17). Guidance is needed here.

Q4.12 The water and flood risk standards aim to ensure that eco-town developments are planned so that they will minimise water use and flood risk, and raise quality. Are the standards proposed clear and deliverable?

In paragraph 4.26 the term ‘aspire to water neutrality’ is not quantified in any way. We feel that this is weak, and allows what would be potentially damaging schemes to be approved.

In areas of high water stress, we feel that Level 6 of the CSH should be applied, as in such locations water becomes a key factor. In other locations, Level 5 seems reasonable.

Q4.15 The community and governance standard attempts to ensure that eco-towns will be successful communities, that residents will have a say in how their town is run, and that standards are maintained. Is this standard clear and workable?

We believe that this whole area is fraught with difficulties. Paragraph 4.33 (a) sets out that ‘standards are met and maintained’. However, in the case of Weston-Otmoor a key issue is the restriction of entry and exit to the site. The proposal depends on restricting outward car movements and charging a £30 peak fee (using the model set out in the Halcrow report) through a single entry and exit road. However, Oxfordshire County Council has a policy of not imposing road charges, and, we are informed will not adopt the roads inside the town unless there is a zero fee structure compliant with County policy. Additionally, there is no incentive for residents within the governance structure to maintain such a fee structure, amounting to £7,000 a year, and which could be deemed illegal. Desire lines will emerge that would channel outbound trips through other routes, and we do not see how it could be democratically credible to maintain standards that are discriminatory, and which would result in a dangerous reliance on a single exit route.

The guidance sets out that the governance proposals ‘should complement existing democratic arrangements’, but the effect of establishing a management trust, in the case of the Weston-Otmoor proposals, would mean that a stakeholder group, rather than a democratically elected group would inherit the power to distribute the legacy funds of the developer group, and thus would retain most of the power. We think this set up can only be temporary, and that a democratically elected parish/town council should take over full powers as soon as is possible, not ‘where appropriate’ or that it ‘should be considered as part of the longer term governance...’ as is set out in paragraph 4.34 (our emphasis).

3.0 The sustainability appraisal for Weston Otmoor

Q5 Do you have any comments on the accompanying sustainability Appraisal/habitats Regulations Assessment or the Impact Assessment?

As we have set out above, we consider that the overall approach to these assessments has been flawed. These assessments were made without the findings of specialist reports have been released on a periodic basis after the publication of the SA. Whilst we agree with the overall thrust of the findings, the overall assessment is of too high an importance to rely solely on the partial guesswork of the great and the good, and should be revised to take on board a considered assessment of the more detailed studies undertaken on a site-by-site basis.

We note that the overall finding for Weston-Otmoor is that it is the only location to achieve a 'C' grade (*'only likely to be suitable for an eco-town with substantial and exceptional innovation'*). We acknowledge, as set out in paragraph 31 that *'the SA and HRA have been undertaken at a strategic level and are therefore necessarily broad in assessment, conclusions and recommendations'* Because of this, a pattern of refining assessment is best conducted by Local Planning Authorities as part of the LDF process, so that all proposals are consulted upon with a level playing field.

Q6 Do you have any comments on the issues identified in the Sustainability Appraisal/Habitats Regulations Assessment of the locations for eco-towns?

Q6.4 Weston Otmoor and Cherwell

As a campaign group our remit does not extend to commenting on the lately added alternative sites now called 'Cherwell', and which have been appraised at a very late stage. We would point out though, that as a consequence of this, the appraisal for Shipton-on-Cherwell, for instance, sets Oxford as being 10km away and 13km away in two adjacent conclusion boxes, and that it is rated positive that traffic to the A34, 5 miles away would need to pass through Kidlington to get there. Clearly, such hurried appraisals need closer review.

In the case of Weston-Otmoor, the findings of following specialist reports would need to be taken into account in a re-evaluation of the conclusions:

- Financial Viability (DCLG, published March 2009)
- Weston-Otmoor – review of Transport Assessment (Halcrow, published January 2009) along with commentary report by Oxfordshire County Council
- Social and Economic Impact Report (ARUP, published December 2008)
- Biodiversity and Green Infrastructure Study (Floodplains Meadows Partnership)
- Landscape Assessment Desk Study (Broadway Malyan)
- Water Cycle Study (Scott Wilson)

We will consider each of these reports in turn.

3.1 Financial Viability Report

Although this report has rated the Weston-Otmoor proposal as being financially viable, our view is that this is not an accurate reflection of what the likely reality would be, and for a number of reasons. Firstly, as the report's authors are very clear

that ‘...at this early stage in the development of proposals of this type extreme care is needed in the interpretation of the assessment’s outcomes.’(1.2) The report goes on to outline three major qualifications: assumptions about land values, costs, and the evidence base used.

Our response to the assessment is as follows:

No value is attached to land value, which is an accounting procedure that effectively assumes that the developer shares profit dividends with the land owners at a later stage. The nature of these arrangements is not spelt out, but a major deduction from the income stream would be expected that currently does not register in this assessment.

The assessment assumes that the developments will comply with the high standard of homes expected of eco-towns as set out in the draft PPS. However, whilst the PPS expects minimum delivery of affordable housing to be at 30%, the South East Plan expects a delivery of 40% of affordable homes in Central Oxfordshire. The additional cost of meeting the SE Plan requirements has not been assessed, nor, within that 40% figure has the higher proportion of social rented properties expected in Cherwell District Council’s local policy (approved August 2008) been costed:

To include in Core Strategy policy a split between social rented units and intermediate housing products as follows:

- 70% and 30% respectively in urban sites, with types of properties (for example, flats or houses) to be advised via a Supplementary Planning Document;*
- 80% and 20% respectively in rural sites, with types of properties to be advised via a Supplementary Planning Document.*

This is as opposed to the vast majority of affordable housing being currently allocated to shared ownership schemes.

The report claims to incorporate an assessment of the costs, benefits and impacts of the schemes, but impact is not defined. For example, for the Weston Otmoor scheme, we are not sure whether the income stream allows for the £7,000 annual charge to householders for using their cars to exit the site at peak periods (using data taken from the Halcrow report and County Council accompanying commentary document) nor on how a £30 charge per day would impact on the level of demand for purchasing a new house. The precise amount and streaming of income derived from this source has also been deemed to be ‘commercially confidential’ and, despite two Freedom of Information requests, Weston Front has not been supplied with this vital information.

As we don’t know what income is being generated from the exit charge for cars, we don’t know and how this impacts on viability. Neither are other likely impacts (e.g. to mitigate the impact on the two on-site SSSIs) elaborated in the report. So at this stage it is not clear what is being included and what is being excluded in the calculations of ‘impact’.

The report sets out ‘heads of terms’. What is immediately clear from the submissions is that what the local authorities for schools, health, fire and emergency services, and

those responsible for delivering expected leisure, affordable housing, and community facilities need is way beyond what the developer is currently offering.

The authors of the report set out that they have *'not taken a view on whether the s106 "offer" ... is likely to be satisfactory in planning terms.'* Instead it explains that *'it will be the responsibility of the promoter and the responsible public sector counterparties to assess in more detail the timing and impact of the scheme and the need for specific additional infrastructure or other impact mitigation measures.'* In other words, it has taken the developer's 'offer' on face value. Because of this it spells out clearly that *'Neither should any part of this assessment be used by promoters to make investment decisions.'*

In making their assessment the Department has assumed an optimistic market recovery model, and they have identified a number of uncertainties which will also affect the assessment. These include:

- Local and national market conditions
- Cost inflation to deal with zero carbon building standards, which will apply by 2016
- Uncertainty over infrastructure and utility timing and costs
- Deliverability and economic viability of the eco-infrastructure
- Social infrastructure required to offset the impact of the scheme

Whilst the site specific assessment is that *'the promoter's proposals have the potential to generate a significant financial buffer against adverse movements in the assumptions.'* The estimate, allowing for discounted income is predicted to generate between £40–203m surplus, and, without the discounted rate the scheme generates between £800m and £1,450m surplus. However, if house sale values decrease by 10% but build costs only by 5% this reduces potential surpluses by £320m. The report states that *'the scheme appears to continue to generate a reasonable surplus.'* but this can only apply to the undiscounted rate assumptions.

However, Weston Front considers that what you get out of a model depends very much on what you put in. In the case of the immediate assessment we note that it is assumed that:

- 1) the development of commercial land *'is aligned to the housing output'*, which the ARUP report into the social and economic Impact points out is likely to lag far behind delivery of the houses, thus increasing out-commuting,
- 2) the distinction between the 15,000 parking spaces (one per household) and the 6,000 space park and ride is not made,
- 3) the financial viability and policy acceptability of delivering a single entry-exit road for a town this size, and the traffic management measures required to manage demand (as set out in the County council report to Cabinet in January 2009) are not assessed. The report sets out that *'it is likely that resolving this issue will be a key consideration if this proposal is to proceed.'*

We note that the early budget for transport infrastructure as originally proposed by the developer at £250m is now set at £530m–£590m. We are not clear whether this assumes that Chiltern Rail's proposed new Oxford–London rail link via Bicester is accepted as already built as part of this budget, or not.

The assessment assumes that the house building costs assume CSH level 4 standards, but sets out that increasing this to level 6 (due by 2016) is contained ‘within other cost headings’. But no breakdown is provided.

The report accepts that before there is agreement on costs and deliverables this will require ‘*very substantial areas of further work*’. Looking at the level of disagreement concerning the level of infrastructure required, this is clearly a huge understatement.

It follows that we believe that a positive assessment based on the developer’s assumptions cannot be relied on. Our view is that these early findings were premature and would need completely revising in the light of the emerging evidence from the other reports.

We strongly disagree with the conclusions of this report, but note that this is not an area covered in the site specific conclusions of the Sustainability Appraisal.

3.2 Review of Transport Assessment

The Halcrow Assessment makes use of a variable demand model – the Central Oxfordshire Transport Model. By its nature this minimises congestion outcomes as it provides for demand to be varied. One weakness in this kind of model is that it assumes that demand can be controlled in this way. Our view is that in a town requiring 19,610 jobs, and generating 9,610 out-commuters (see our response to Q4.8), elasticity would be limited, and would either lead to congestion or limit the growth of the town. We also note the ARUP report findings that even this total of out-commuters is unlikely to be accurate as job supply would lag behind housing delivery for a number of years.

The report takes at face value the developer’s assumptions, such as the restrictions on cars leaving the site fixed in initial projections at 1,000/hour and in subsequent models at 1,500/hour, the ability to deliver train, tram and bus services at the frequency set out in the master plan, the trip destination projections and the effect of the proposed junction 9 improvements. In our own study of the transport implications, we have concluded that it is highly unlikely that the provision of a 6-minute train/train-tram frequency into Oxford is achievable, and certainly not on the basis of a one-hour return journey with 13 stops *en route*.

The model does not deal with factors such as whether the preferred model of a £15 exit fee could be charged, given that Oxfordshire currently does not endorse congestion charging, and any adopted roads would need to comply with countywide policy (i.e. there will be no fee in reality). Nor does it challenge the basic assumption that a planning application would be approved for a development on this scale with only one entrance/exit (it would not). Nor does it take into account the potential displacement of residents’ vehicles to areas immediately outside the town or to Bicester in order to avoid the charge.

A number of scenarios were developed, as well as a base scenario which assumes no eco-town development. Traffic levels and public transport passenger miles were measured for each of these scenarios, which were:

- 1) no eco town,

- 2) fully completed eco-town 50% of trips deemed to be within the town,
- 3) fully completed eco-town 63% of trips deemed to be within the town,
- 4) part developed town by 2026 50% in-town journeys,
- 5) part developed town by 2026 63% in town journeys.

The preferred model was that 63% of trips were deemed to be within the town, with a £15 exit/entry fee for morning and evening peak journeys. The preferred model also assumes that because of the real time information located in each house, that residents would make the most logical modal choice. We share the views of the TCPA that self-containment will be under 50%.

Although the morning peak was assigned as 8-9am in the model, our own traffic counts indicate that the actual peak is more like 7.30-8.30 at Gosford, and possibly slightly earlier from Weston. This impacts on the likely traffic levels.

Even with a model that already carries a significant under-representation of the most likely impact, the additional traffic results in some additional congestion, mainly on the M40, and 7% of suppressed journeys, along with 4% queueing (and not leaving the site). We don't believe that that level can be sustained. Another result is that the number of seated train/tram passengers exceeds 110%, which means that a lot of people would be standing on peak hour services. As stated earlier, because of journey lengths and line capacity limits, we believe that actual capacity would be somewhat less than the capacity proposed. And, we're not sure how the proposed 8 buses an hour from the North Oxford Interchange station will cope with the anticipated 47% of rail-based passengers seeking to get to East and South East Oxford's employment areas.

We share the view of the County Council that a more realistic scenario would have multiple exits from the town, no fee or restriction on movements, and would provide a robust assessment as to whether or not the public transport system is deliverable, among other points.

We strongly disagree with the Sustainability Appraisal's positive rating that Weston-Otmoor receives as a result of its proximity to Oxford and Bicester. As we have stated elsewhere, in this instance its proximity brings conflict with other policy priorities such as the self-containment of Bicester and the viability and vitality of Kidlington.

We disagree with the neutral rating afforded to the proximity to railway station. This is because the impact of constructing major infrastructure primarily designed to serve substantial short-distance additional commuter journeys to Oxford conflicts with the strategic objectives of the East-West Rail Partnership to provide a fast inter-urban route from Cambridge and Bedford to Oxford, and those of the express link by Chiltern Rail from Oxford to London.

We endorse the other conclusions within the Transport and accessibility section in respect of Weston-Otmoor.

3.3 Social and Economic Impact Report

This is the only report looking at non-environmental aspects of the proposals which has not relied principally on input from the developer. Whilst taking evidence from the developer, it also provided an opportunity for a wider group of agencies to submit

evidence. Meticulous care has been taken to make use of a wide range of publically available information including census data. This is the only report in this sphere that can claim to be independent.

Members of the Weston Front Committee attended stakeholder meetings and submitted evidence to ARUP. Kidlington Parish Council, for instance, submitted a detailed document, and the Bicester Chamber of Commerce made similar representations. What follows is a powerpoint summary of these two viewpoints, both endorsed by Weston Front.

Focus on Bicester

- *Substantial population growth*
- *Inadequate road network*
- *Poor stock of commercial property*
- *Limited social and community facilities*
- *Only 20% of residents shop in Bicester*
- *55% of residents commute out to work*
- *Comparatively low level of educational qualifications*

Bicester Vision Partnership

*Town, District, County Councils, Chiltern Railways,
Bicester Village, Stockdale Land, Chamber of Commerce*

- *Support development*
- *Provide a safe environment*
- *Joined up thinking about development of Bicester*

Achievements

- *Progression of town centre redevelopment*
- *Outline consent for major office & hotel development*
- *Growth town status*
- *Extension of Bicester village and Wyvale development*

Impact of Weston-Otmoor

- *Eco-town less than 4 miles away*
- *Reverse current momentum*
- *Competition for business and population growth*
- *Problems with service provision*

Only enough demand for one growth area. Weston-Otmoor would have a major impact on Bicester

Focus on Kidlington

- *Underperforming village centre (rent, yield, footfall)*
- *Demand for regeneration of village centre: retail expansion, improved environment and integration (Healthcheck)*
- *Need for affordable and other housing to meet local needs and help fund improvements (1,300 wanted)*
- *Green Belt constraints, but great transport links*

Impact of Weston-Otmoor

- *Competition for houses and business*

- *Major traffic impact*
- *Loss of railway station*
- *Duplication of mid-order services*

As can be seen from the selective conclusions from the ARUP report that follow, these concerns were largely upheld after detailed scrutiny.

Economic impact

'Recently there have been tentative signs that Bicester is reaching a turning point in its economic fortunes, with significant new developments in the pipeline including new business space and leisure facilities.'

'There is potentially substantial capacity for further growth of housing and employment in Bicester.'

'The employment space at the eco town will compete with rather than complement provision at Bicester and Kidlington.'

'Bicester will fail to realise its vision and may be less sustainable as economic activities decline.'

'The most intense potential impacts on Bicester will be in terms of housing and jobs and on employment developments in Kidlington.'

'Employment growth is likely to lag behind housing growth and it may take many years before these balance.'

Social impact conclusions

'The scale and proximity of Weston Otmoor to Bicester may have a destabilising effect on Bicester's local primary care services, as it would directly compete for investment.'

'The scale of the development would not be sufficient to justify the provision of higher-order services such as acute hospitals, theatres, etc; therefore it would be necessary for Weston Otmoor residents to travel to other settlements to meet these requirements.'

'The child yield may be greater than currently assumed in Parkridge's early assumptions, and therefore the education offer would need to be increased.'

We fully endorse the conclusions of the ARUP report. We expect this evidence to carry a great deal of weight in any subsequent updating of the Sustainability Appraisal, and we consider the conclusions to represent a final showstopper preventing Weston-Otmoor appearing in the eco-towns programme.

This is an area of study that the Sustainability Appraisal hardly touches on at all. We think this is a serious omission. Much greater weight should be placed on the proposal's impact on the surrounding settlements. We disagree with the positive rating that the proposal would contribute to retaining the character of Oxford. We believe that additional traffic generated will quickly lead to congestion at Oxford's

major ring road interchanges as a result of additional traffic on the A34. We don't accept that the town would benefit Oxford, as it is not producing any significant contribution towards the type of social housing that would be required. We query whether key workers would be attracted to commuting journeys with over-filled tram-trains and over-capacity bus transfers to local hospitals and schools.

We endorse the negative appraisal of the impact on the regeneration of Bicester. We would add Kidlington to this summary, as Kidlington is also much in need of regeneration.

We note that there is no appraisal of other aspects of community well-being. In the case of Weston-Otmoor, a single entrance and exit road, which could easily become blocked, will lead to safety issues. The maintenance of strict covenants restricting the ability of local governing bodies from relaxing those conditions that create a claustrophobic and unworkable lifestyle may lead to the development of a ghetto-like feel to the town, with disastrous consequences. We strongly feel that this is a key sustainability issue which has been overlooked.

We strongly disagree with the positive assessments on housing. As stated elsewhere, the housing mix is below the 40% target set out in the SE Plan. If this scheme goes ahead it would be offset against the overall housing targets for the Cherwell part of the Central Oxfordshire sub-region, and other schemes promising 40% affordable housing would not be approved. We also consider that the summary neglects to distinguish between socially rented affordable housing and intermediate affordable housing schemes. In this area the most pressing need is for socially rented schemes, but in the proposal, 95% of the affordable homes are of the intermediate affordable scheme type. The appraisal needs refining as the current scheme does not meet the demand.

3.4 Biodiversity & green infrastructure

Whilst there are patches of ancient woodland, and the Thames Valley Records Centre (TVERC) confirms the existence of a wealth of interesting wildlife across the entire site ranging from brown hares to a variety of bats, all of which will be at risk, our main concern is over the malign direct impact of the proposed development on the nationally important Weston Fen SSSI and Wendlebury Meads and Mansmoor Closes SSSI. This is fully supported by the conclusions of the independent assessment carried out for Cherwell District Council by the Floodplains Meadows Partnership.

Both SSSIs rely for the integrity of their unique plant and invertebrate communities on their particular groundwater, sourced as it is from different geological strata. The proposed development will cover a large part of the re-charge area for both sites. This will alter the water levels and flows of both SSSIs and their overall hydrology. Once this occurs they are liable to lose quite rapidly the communities for which they have been scheduled. Scott Wilson's Water Cycle Study (scoping phase) - see below - also acknowledges these potential risks.

Both studies point to the need for much more research to be carried out on the existing hydrology and groundwater flows, and the need to establish a baseline of plants and invertebrate populations in order to set up a model for estimating and monitoring

future change. As the Floodplains Meadows Partnership points out, the normal period for such a baseline study is three years before it can be determined how the SSSI sites might be affected by any proposed development.

Proposals for mitigation by the developer are therefore premature. It can be assumed, however, that projects to maintain groundwater flows as they are to-day, with sufficient robustness to accommodate future climate change, even if possible, are likely to be considerably more costly than the odd bund and grassed area which has been suggested by the developer to date. This clearly casts an element of serious doubt on the costings used in Price Waterhouse's Financial Viability exercise, and by implication the results of that study.

In addition, mention is made in Scott Wilson's Water Cycle scoping study of the possible indirect impact of such a large development at this particular location on a third major SSSI on Otmoor itself. To this can be added the even more important (internationally) Oxford Meadows SAC. These sites lie downstream of the proposed development, and are therefore potentially sensitive to any changes in the catchment upstream as regards volumes and quality of both surface and groundwater.

We endorse the negative assessment in the Sustainability Appraisal.

3.5 Landscape Assessment

As Minister Margaret Beckett finally accepted in her statement on eco-towns on 4 November 2008, the Weston Otmoor site is "mainly green field". In fact all 828 hectares are effectively green field, with the exception of the few scattered buildings on the MOD's Weston-on-the-Green airfield. Furthermore 203 hectares, or 24.5%, of the site lies within the Oxford Green Belt. The whole site as it exists to-day is one of overwhelming countryside character.

Broadway Malyan highlight in their Landscape Assessment Desk Study they completed for Cherwell District Council, that the landscape character of the location is such that it could only absorb some small scale new development "providing this is sensitively sited and set within a strengthened landscape framework. Over development could degrade and detract from the landscape of the area". It goes on to say that "in our view the Western Otmoor proposal would constitute such over development because of its sheer scale and density". Their overall assessment is that the proposed Weston Otmoor eco-town "would have an unacceptable Landscape and Visual impact on the site and surrounding area". We fully endorse this conclusion.

As with many other consultants struggling to assess the various aspects of this scheme, and common to the public at large, Broadway Malyan were hampered by the vagueness of much of the developer's so-called master plan, which has mutated regularly over the past year, and is still light on many important details. What is clear is that Parkridge are proposing an intensely urban development, which is totally out of character with the scale and density of existing areas of settlement in the area. Vague plans for parks and allotments give the impression of "greenwash", and do nothing to allay our concerns that the whole development will essentially replace traditional Oxfordshire countryside with a vast urban conurbation, which will not only degrade the site itself, but detract from a wide swathe of surrounding villages and their rural settings.

We cannot understand how Scott Wilson in their Sustainability Appraisal, having pointed out that Weston-on-the Green is a designated a Conservation Area containing 32 listed buildings, can still give the Weston Otmoor development a positive rating! The village will essentially be enveloped by the new town and its character utterly changed for ever.

More importantly, Scott Wilson says there are no designated landscapes across or adjacent to the site. As observed earlier, 24.5 % of the site falls within the Oxford Green Belt. The restrictions imposed by PPG 2 are such that Parkridge have had to revise their draft Master Plan a number of times to move residential and commercial buildings away from this protected landscape. However they still intend to destroy its open character by imposing, inter alia, a 6,000 space car park with associated lighting, a new waste water treatment plant, an energy and waste centre including a large CHP plant, and all the trappings and accoutrements of a new railway station and linked tramways. All this will lead to a completely unacceptable breach in Oxford's Green Belt.

We strongly disagree with the positive rating given to this topic in the Sustainability Appraisal.

3.6 Water resources, water quality and drainage.

Scott Wilson's Water Cycle Study – scoping phase – confirms that the proposed eco-town at Weston Otmoor faces severe challenges.

As far as water resources are concerned, the location lies in one of the country's driest regions. The latest Catchment Action Management plan for the River Cherwell and its tributaries indicates that already no additional abstraction is possible above the current licence regime. A town of 35,000 residents would present Thames Water with serious difficulties to meet its needs by pumping additional water from Farmoor Reservoir. Recently announced delays in Thames Water's putative plans for additional storage capacity, or transfer from other catchments, now go beyond 2025. This, coupled with possible further tightening of supply caused by the application of the Water Framework Directive and/or climate change, all leads to the impression that a new town of this density and scale in this particular place is exactly what is not wanted.

Wastewater presents even starker problems. Essentially the entire infrastructure for sewage and wastewater systems will need to be constructed from scratch to serve the requirements of every stage of development of the new town. Effluent capacity, already under strain to accommodate the rapid growth of Bicester, would, according to Thames Water, need to be doubled. They go on to point out that new wastewater treatment works take typically 7-10 years or more to construct. This together with the scale of infrastructure investment required, puts a wholly new light on the phasing of the construction of the new town, which, together with the scale of infrastructure investment required, in turn raises interesting questions over the assumptions (all provided by the developer) used in Price Waterhouse's Financial Viability Study.

Only 4% of the site lies within the Environment Agency's Flood Zone 3, however the impact on surrounding areas of major changes to run off caused by such a major development are likely to be severe. Local farmers in the vicinity have already noticed

the increased tendency for local flooding due to changes of runoff from the construction of the M40 motorway. Wendlebury village lying adjacent to the motorway has experienced a worrying trend of damaging flash floods. If a motorway can cause such disruptions, one can imagine the problems that will be raised by the construction of an urban conurbation on the scale proposed. The Water Cycle Study recognises this eventuality, and indicates that major Sustainable Urban Drainage Systems (SUDS) would need to be constructed around the site. Again this has major financial implications for the developer, who would not only have to build, but also maintain, such systems.

We endorse the negative assessment in the Sustainability Appraisal.

4.0 Conclusions

Nothing has convinced us that there is a need for a PPS aimed exclusively at establishing an eco-town programme. Although we are not in principle opposed to eco-towns, we believe the PPS in its current draft form completely undermines a planned process which has been built up through proper consultation structures and in an open way. We do not see that with similar CSH standards across the board there is any necessary distinction between urban extensions and separate eco-towns. What would be more helpful would be a sustainability design pack enabling consortiums to form in order to deliver efficiently ways of delivering CSH Level 6 housing.

In the Weston-Otmoor case, the developer has consistently supplied inadequate information for the plan to be evaluated with any degree of credibility. Key information, such as the proposed income stream from cars exiting the site, has been withheld from interested parties such as ourselves, restricting our ability to make valid evaluations of the viability of the plans, and, in this instance the impact such fees would have on the likely demand for public transport. We consider this process to have been both undemocratic and unreasonable.

The ramshackle timing of the release of new reports, and the fact that there is a mix of evidence used means that it is virtually impossible to compare like evidence with like, an aspect of one report with a related aspect from another report. It is a complete shambles that means that information is partial and unintegrated into a wider overarching strategy.

At this stage proper stock needs to be taken of the more detailed work that these reports provide, such that there is some kind of joined up stage report that is open to consultation. We certainly feel that it would be ridiculous under the circumstances to proceed with any form of designation of sites, and we would certainly endorse Cherwell District Council's stated view that the inclusion of Weston-Otmoor would trigger a legal challenge.

For all the arguments set out above we consider that the location and the conception of the Weston Otmoor proposal is fatally flawed. Whatever decision is made it is transparently clear that Weston Otmoor should be excluded from the eco town process.

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