

Mr Stuart Walker
Major Applications Officer
Vale of White Horse District Council
Abbey House, Abbey Close
Abingdon
OX14 3JE

20 November 2014

Dear Mr Walker

Re: Planning application P13/V2733/FUL

I am writing once again as the local Member of Parliament to submit my formal objections to the planning application for The West Way Centre, Botley, which involves the proposed '*demolition of a mix of existing buildings and the erection of a mixed use development*'. I would ask that my comments here are taken into consideration along with my previous submissions.

Plans to invest in West Way could have created an appropriately sized community space in Botley. Regrettably, the plans that have been submitted do not provide this. Local residents have been clear that they are not opposed to redevelopment in principle, they simply want a shopping centre in keeping with the character of the local area. Despite some welcome amendments to the height of the buildings and improvements to accessibility, my concerns over the total scale and potential impact of the plans remain unchanged from my previous submissions. The impact on traffic has not been adequately modelled and the nature of the application is not in keeping with the District Council's plans for Botley and will fundamentally change the character of one of our most distinctive communities.

The Planning Committee will be aware that the local community is deeply interested in this application and I fear that the applicants have not listened adequately to the issues they have raised.

I have set out my outstanding concerns here:

BOTLEY IN CONTEXT

Since learning of the size and scale of these proposals last year, I have consistently said that the application fails to recognise that Botley is a distinct community and repeatedly utilises Oxford City objectives in its reasoning rather than the District Council's. Botley is a community that, while enjoying the benefits of proximity to Oxford, lies outside the city both historically and geographically. Indeed, Botley only became a part of Oxfordshire in the last 40 years. The fact that this application is coming before a District Council rather than a City Council should give cause to remember the nature of this integral locality. The developer has treated Botley as though it were an underutilised part of Oxford City rather than the vibrant and distinct community that I know it to be. The scale of the development is therefore highly inappropriate as recognised in 7.15 of the EI NTS.

DEVELOPER AMENDMENTS NOVEMBER 2014

Cinema

The National Planning Policy Framework (NPPF) and the Vale's own Saved policies from its Local Plan 2011 require new developments to reflect and enhance the distinctive character of the area, and

that they do not ‘...adversely affect the character of the locality in terms of the layout, scale, mass, height detailing, materials used or its relationship to adjoining buildings and open space’ (NPPF: 126, 58, 59 and 60; Vale Policy: DC1).

I wish to reiterate the points made in my previous objections, and by countless local residents, that the proposed cinema is not appropriate for Botley and is too large. The application includes a six screen cinema of the size that sits within Oxford City Centre such as those in George Street or Magdalen Street. While the increased distance from the housing boundary is welcome, the scale of the proposal continues to represent a significant potential harm to Botley’s character. The increase landscape buffers around the site are also welcome however the Design Panel’s comments on the impact of the large buildings on nearby residential properties should deeply concern the Planning Committee.

Residents have also pointed out on a number of occasions that there are three cinemas within 20 minutes of Botley, plus another cinema included in current proposals for West Way.

Service yard screening

This is welcome and goes some way to address my previous concerns as set out in my submissions regarding potential service yard noise nuisance. The additional landscape buffer should also make a small improvement to the overall effect on the nearby residents as outlined in the amended 12.16 of the Environmental Impact Report NTS.

Management Suite now located on Westminster Way to provide additional active frontage

Given widespread concern amongst residents about the Westminster Way frontage, the inclusion of an additional active frontage is a step in the right direction however the overall street scene is unimpressive. However, the South East Regional Design Panel’s concerns over the lack of architectural merit in the overall plans have been met by minor modifications rather than a more ambitious overall change.

The requirements for good design in Section 7 of the [National Planning Policy Framework \(NPPF\)](#) have been met by neither the original plan nor the amendments.

Student accommodation reduced in height

While the reduction in height of the student accommodation is welcome it does not go far enough. The adjustments do not represent significant change to the forecast impact of the scheme on the environment as per the Statement of Conformity from RPS: “As a result the latest adjustments to the proposals do not change the previously reported affects on the character of either the local setting or the wider landscape.”

Demand

I have repeatedly made representations on behalf of my constituents with regard to the need for the developer to take proper account of the local context. A key concern raised with me has been about the proposed student accommodation, and in particular whether it is needed. The developer rests on two studies which take positions fundamentally at odds with the higher education institutions themselves.

The Director of Estates at the University of Oxford has made clear the position of the University in his letter to Baroness Deech QC, dated 4 October 2014. It is worth quoting from the letter itself to make this point:

'I can assure you that the University has no interest in the project. I recall being contacted by the developer about two years ago, and we assessed the site as we would any development in and around Oxford. It was agreed at the time that it was not in a location that would be of benefit to the University and particularly not to any of our students that might live there, given the distance to their colleges.

It is wholly inappropriate if we are being represented as an interested party and we will be contacting the developer and their agents to ensure that they have a clear understanding of the situation.'

This clear and unambiguous statement, decided two years ago, suggests that the studies commissioned since are misleading.

Further, the demand reports produced by Jones Lang Lasalle and Savills for the developer portrays an inaccurate picture of demand designating the second largest group of student accommodation, that of a flat share, as the 'other' category. This ignores a consistent trend for students to move away from purpose-built accommodation into flat shares throughout the course of their degree.

The reliance in the demand report upon an effective student management strategy has not been founded. As outlined previously the student management plan is unconvincing as it fails to tailor provision to the specific needs of the project. The student management plan, utilising postgraduate wardens, appears to be a scheme for undergraduate focussed accommodation whilst the developers have increased mix bias in favour of postgraduate appropriate studio flats. The general adjustment to the mix in the student accommodation represents a move towards postgraduate accommodation however the student housing need report focussed on for instance reports into LSE undergraduates that looked to the undergraduate market. Rather than the student management plan adding to the application it further demonstrates that this part of the application has not been adequately justified despite understandable concerns from residents.

Furthermore, the 2011 Census shows an extremely low level of student housing in Botley. The designation of an area for significant levels of student habitation should be the role of strategic planning by the Vale rather than tactical approaches from developers through standard planning applications.

Residents are also concerned that the reduced amount of student communal space will put added strain on the piazza which is shared with the public thus exacerbating the aforementioned under-managed student blocks interaction with local residents.

One complete floor taken off wing of accommodation

This is a positive improvement in reducing the height of the accommodation, however the total massing is still substantial for the area as outlined above.

Community Hall now at Ground Floor in the NE corner. Gym at second floor in this section

Given the concerns of North Hinksey Parish this adjustment to the application is welcome. North Hinksey Parish Council expressed its satisfaction with the ground floor community hall in its letter of the 17th October. This should retain a community resource in the centre of Botley.

Having spoken with residents about the amended plans, there are outstanding concerns about the design of the Community Hall in that it is poorly located so as to restrict light air-flow.

UNADDRESSED CONCERNS

Parking

The viability of the scheme rests upon a catchment area greater than that of a designated local service centre such as Botley. The scheme will only create an additional 180 spaces on the current 38 spaces whilst more than 4 times the size of the existing centre. Given that the parking will need to be used by employees and visitors to the hotel, gym, supermarket and cinema this provision is wholly inadequate and overflow parking issues are likely to disrupt constituents who live near the site.

I would ask that the Planning Committee consider the points raised in my previous objections with regard to overspill parking into surrounding roads.

Traffic

Under Policy S1 of the District Council's Local Plan comes a requirement to "*safeguard the local centres at Botley and Gove and to reduce traffic congestion...*" (Para 12.3). The scale of the scheme requires that either traffic will dramatically increase or else the viability of the scheme must be questioned. I have stated my strong concerns regarding the methodology and scope of the transport assessment. The methodology used for the Environmental Impact Assessment has been questioned by the local community and I share their concerns in particular with regards the extremely narrow definition of the surrounding network. Significant increase in traffic is likely to have a detrimental effect on Botley residents and be unsustainable within present infrastructure.

I would like to reiterate for the second time my broader concern over the effect the application will have on traffic: *'Noting that Oxfordshire already has a 50% worse congestion index than the average city area, I feel very strongly that locating a development of this scale in such a severely congested pinch-point is a recipe for disaster. At the very least no development should be permitted before significant infrastructure investment can be found to offset the impact of the additional traffic the development will generate'*.

Loss of community amenities: vicarage, Field House etc.

I oppose the lack of replacement of the vicarage. As the current occupant Rev. Sykes has stated they are semi-public buildings that need to be within easy access for people. I maintain my previous concern that the decision to not replace the vicarage demonstrates a blow to the local community.

I also have very serious concerns over the future of the occupants of Field House. On a number of occasions the developers have indicated their willingness to ensure that residents will not have to move more than once. However, this has not been publicly communicated, and my concerns regarding the potential impact on vulnerable residents remain unaddressed.

LOCAL PLAN

The Vale of White Horse District Council should also consider the implications of their decision to no longer class Botley as a District Centre in the context of Oxford City in their Local Plan (Core Policy 11). Under the Oxford City Strategy, such District Centres are specifically identified as potential locations for additional student accommodation and under the Duty to Cooperate this would have had to be taken into account by the Planning Committee and any future Planning Inspector should this application go to appeal.

Clearly, although the VOWHDC Local Plan is still in draft, it is at an advanced stage in the approval process and as time passes increasing weight is given to its policies. Therefore, the implications of

the decision to no longer class Botley as a District Centre, and therefore, not a potential site for additional student accommodation in the context of the Oxford City Strategy must be fully considered by the Planning Committee when deciding on this application.

CONCLUSION

Ultimately, I remain deeply concerned that developers have not made the significant changes to the application that a substantial number of the local residents have been demanding. The local community has expressed its openness to appropriate redevelopment of the existing centre, however they feel the size and scale of the proposed scheme is simply not right for Botley.

My concerns on traffic implications have not been addressed, nor have community concerns about overall massing and architectural merit.

The developer relies unduly on the unsubstantiated need for student accommodation, as outlined above, which is especially concerning given the University of Oxford's starkly different assessment of their own need for the proposed student accommodation.

Therefore, once again, I urge the VOWHDC I urge the Planning Committee to listen to local concerns and reject this planning application outright.

Nicola Blackwood
Member of Parliament for Oxford West & Abingdon