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Planning Policy
Vale of White Horse District Council

23rd June 2014

Your ref: Consultation P13/V2733/FUL

Our ref: Response to EIA

Dear Stuart

Amendment: No.1 (3rd June 2014)

Location: Botley District Centre, West Way Botley

Proposal: Environmental Impact Assessment submitted by applicant / agent in connection with the demolition of a mix of existing buildings and the erection of a mixed-use development comprising retail, restaurants and cafes, offices, hotel, student accommodation and ancillary facilities, 33 apartments, replacement vicarage, library and place of worship (Baptist Church), health centre, cinema, gymnasium, covered car parking and access, public square, landscaping and associated works.

Application Reference: P13/V2733/FUL -334

Thank you for consulting Oxford City Council on the above Environmental Impact Assessment (EIA). The City Council welcome the fact that an EIA has now been carried out but remain concerned that there are still likely to be some considerable adverse impacts resulting from this proposed major development, which lies very close to the City boundaries of Oxford.

The keys environmental impacts for Oxford are likely to be around transport (traffic and congestion); air quality; and cumulative impacts.

Transport

The City Council consider that the road network is already operating at capacity at the moment with Botley Road being one of the busiest arterial roads into Oxford. The consultants in the original transport report acknowledge that some of the assumptions in their base modelling may not truly reflect the present position and therefore the potential impact both on the local transport network and on Oxford. For example the consultants state (para.9.19) that *"It is noted that within the morning peak when the traffic queue*



extends back to the Eynsham Road / Cumnor Hill junction the restriction or bottleneck is the route to the centre of Oxford with traffic queuing along the Botley Road from Oxford Station and the centre of Oxford.” It is then acknowledged (para.9.20) that the model was validated against average queue lengths but “the base model may not indicate the extreme queuing that is evident at certain times during the peaks.”

The transport modelling for retail trips (Table 8.20) in particular forecasts that there will be a significant diversion of trade from the South of Oxford and Cowley (Zone 4) of some 30% together with a trade diversion of some 10% from Oxford City centre (Zone 3). In addition the proposed Cinema is likely to draw trade principally from the Vue Cinema in Oxford, which would amount to some 65%. This serves to illustrate the likely retail impact of the proposed development on these existing businesses within the City. It is also clear from the analysis that in the case of the retail trips a significant proportion some 28.4% would be using the A420 East (Botley Road) in Oxford; with a further 29.3% using the A34 from the South.

It does appear that the transport modelling considers only a very 'local' area immediately around the proposed development site with the transport model flows effectively ending at the start of the Botley Road. Therefore the traffic and congestion impacts along the Botley Road itself do not seem to be thoroughly assessed. This does seem to be very surprising given the importance of this road as a main artery into Oxford, which will clearly attract more vehicle movements by those travelling both to and from the proposed development. The EIA should be amended to take into account these traffic and transport impacts along the Botley Road.

In addition the transport model only considers the potential impact of a limited number of new development commitments within the local Botley area. To provide a complete picture however the EIA should take into account the additional traffic that is likely to be generated by some of the other future major development sites in Oxford such as the new Waitrose in Botley Road; the redevelopment of the Westgate Shopping Centre; the development of the Oxpens site and the redevelopment of the Gateway Station in Oxford. Clearly all of these development commitments will be likely to add to the cumulative environmental impact of this proposal on the local transport network.

Notwithstanding the proposed mitigation measures including highway improvements put forward by the applicant there was still expected to be an impact of some significance compared to the base position both in the forecast traffic modelling for 2021 and 2025. The City Council is concerned therefore that the existing traffic and congestion problems in the area, particularly in the Botley Road (A420) and A34 at peak periods are already significant and therefore any increase in the amount of vehicle movements has the potential to worsen the situation. Any other additional measures such as a Construction Traffic Management Plan and a Travel Plan will congestion are insufficient to significantly reduce the environmental impact given the scale of the development; its location and existing traffic congestion. Any proposed mitigation measures need to be of a more substantial nature that will positively improve the local highway network and therefore should focus on identified schemes that contribute to significantly reducing the impact on Oxford such as transport measures to the A34 and or Botley Road, as set out in the City Deal.

The proposed student accommodation units (550) being located outside the City boundaries could potentially be occupied by students from the University of Oxford or Oxford Brookes University. Within Oxford City Council's boundaries the impact of student



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accommodation units is significantly mitigated by an agreement with these two Universities that students do not bring cars into the City; however given this site is outside of Oxford such an arrangement does not exist at present. In these circumstances students could potentially bring cars to the site and or the surrounding residential streets, which could result in further congestion, highway safety issues and noise and disturbance to local residents.

In the absence of any significant mitigation measures it is considered that the environmental impact of this proposed development, to include a new food store (8,300 sqm), hotel (100 beds), commercial leisure (6 screen cinema), student accommodation (550) and residential uses, will have at least a 'moderate' significance if not greater, certainly not of 'negligible significance' during the operational phase as suggested in the EIA.

Air Quality

The Air Quality assessments appear to have been undertaken in a localised way assessing only the potential impacts on nearby residential properties. Whereas in practice whilst this proposed development site lies in close proximity to Oxford's administrative boundary and therefore impacts on air quality resulting from this proposal should be assessed within the context of a much wider area. It is important to consider the potential impacts on air quality arising from the increase in congestion and traffic movements that are likely to result from this proposal. Oxford City as a whole has been designated an Air Quality Management Area (AQMA) and clearly in a practical sense the administrative boundaries alone will have no material effect on limiting air quality the environmental effects therefore should be fully assessed to include parts of West Oxford, such as around the Botley Road area that are likely to be directly affected by this proposal.

The air quality model used appears to be validated against background monitoring sites, located at some distance from the development site. The data used would give rise to significant potential error in the final impact assessment at the identified receptor points. If the traffic model is extended down the Botley Road as we are suggesting, then we have monitoring data at points close to the Botley Road that could be used as part of the model validation.

It is therefore considered that the air quality impacts are not 'negligible' as suggested by the consultants but are likely to be of greater significance. In these circumstances it is strongly suggested that further air quality assessments should be carried out linked to some additional transport modelling to assess the traffic and congestion along the Botley road. It is also considered that further mitigation measures could be employed on the site, such as for example including provision of electric vehicle charging points, developing a Delivery and Service Plan and encouraging greater use of low emission vehicles.

Cumulative impacts

The cumulative impacts to be assessed comprise both 'combined effects' of particular impacts together with the effects from a number of development sites when considered cumulatively.

In relation firstly to the 'combined effects' the assessment does not appear to consider the effects of transport and air quality, which are inextricably linked. This is of particular concern since there is a lack of transport modelling along the Botley Road, which forms part of Oxford's Air Quality Management Area (AQMA). In these circumstances it does



make it very difficult to arrive at any informed view concerning the impact of the increase in traffic and congestion in this area and how this affects air quality.

Secondly the cumulative effects have used a very limited catchment area of 2km from the site. However even on this basis there are a number of key development sites likely to come forward at the same time as this proposal. These include for example:

- **Westgate:** The redevelopment of the Westgate Shopping Centre which is an allocation in the West End Area Action Plan and is particularly significant since it comprises principally a retail-led development (72,500 sqm) together with service uses and a Cinema. It has already reached an advanced stage in the planning process with outline planning permission recently granted with detailed applications to be submitted shortly with the expectation that work will commence in 2015 and is completed in 2017.
- **Oxpens:** The redevelopment of the Oxpens site, Oxpens Road, to comprise offices 9550 sqm, R & D and a new hotel, which has been subject to a Master Plan and has an adopted Supplementary Planning Document to inform the development of the site which is expected to take place in 2016;
- **Gateway Station Oxford:** This proposal is for the redevelopment of Oxford's Railway Station. A Master Plan has been prepared in partnership with Network Rail, City and County Council's, with work intended to commence in 2016.
- **Waitrose, Botley Road:** This application for a new food store for Waitrose in Botley Road is for 3,500 sqm (2,400 sqm net), which has now been granted planning permission. Whilst the footprint of the new development is less than the existing building the nature of the retail use and its user is likely to act as an important destination and therefore likely to attract more activity than previously.

Other than the Waitrose application in the Botley Road none of these other major development sites in Oxford, which represent development proposals that will take place with some certainty within the same time frame as this proposed application, have been taken into account as part of the environmental assessment of the cumulative impacts. The proposed redevelopment of the Oxpens site and Gateway Station are key projects and priorities for Oxford City Council that have been included in the Strategic Economic Plan (SEP), which has been approved and sent to Government. It is therefore considered that these major developments sites should be included as part of any Environmental Impact Assessment (EIA) to properly assess the cumulative effect of the development.

Conclusion

The City Council consider that this Environmental Impact Assessment (EIA) has not fully assessed or attached significant weight to the potential environmental impacts of the proposed development on Oxford particularly in relation to the effects on transport and air quality. Furthermore the assessment does not appear to have fully considered the cumulative effects of this proposed development in the context of other major development sites that are likely to come forward in Oxford within the same time period.

Yours sincerely,



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Michael Crofton Briggs
Head of City Development

