

**The Chiltern Railways (Bicester to Oxford Improvements) Order -  
January 2010 (Evergreen 3)**

**TRANSPORT AND WORKS ACT INQUIRY**

**Statement of Case of**

**CPRE Oxfordshire**

**(Campaign to Protect Rural England)**

Ref. TWA/10/APP/02/OBJ/195

**AJ/CPRE August 2010**

## **CPRE Oxfordshire Statement of Case**

### **1. Introduction**

1.1 The Campaign to Protect Rural England is the foremost campaigning organisation for the countryside and for the interests of those who live in it or enjoy it. The CPRE Oxfordshire branch was founded in 1931. CPRE Oxfordshire promotes the beauty, tranquillity and diversity of rural Oxfordshire by encouraging the sustainable use of land and other natural resources in town and country. The Oxford Green Belt continues to be one of our primary concerns.

1.2 Whilst CPRE is supportive of measures to promote more sustainable travel and sustainable development, our countryside is a precious and finite resource and the openness of the Oxford Green Belt requires constant protection from the threat of creeping urbanisation.

1.3 The following is the CPRE Oxfordshire Statement of Case for the Public Inquiry into the TWA Application by Chiltern Railways.

1.4 As indicated in our initial response (17 Feb 2010), there are many elements of the proposed improvements we would support, but we highlighted a number of significant concerns about the potential impacts of this complex scheme which, as far as we are aware, remain unresolved, or not adequately resolved, at the time of writing. We have received a response to the issues we have raised from ERM (25 June 2010) in which we note that ERM state that on several matters further information is to be provided to and discussed with the relevant authorities (eg on transport impact issues) but we have not seen any other further published information at this stage from the key parties. Our Statement of Case for the public inquiry is therefore based on our original submissions and the information which is readily available to us. However, we assume further detailed submissions will be made by the parties before the inquiry, providing further information on these issues which it may be necessary for us to address.

1.5 CPRE believes these issues are of considerable significance for the City and its sub-region, its Green Belt setting and local transport networks, and should be properly

resolved as part of the TWA process. We contend they should therefore be examined comprehensively and properly at a public inquiry by an independent inspector.

1.6 At this stage we do not intend to call witnesses but reserve the right to do so depending on the evidence which may be submitted by the parties.

## **2. Elements we would support in principle**

2.1 We would welcome and support the broad objectives of the Chiltern Railways Scheme, i.e. in tackling congestion, addressing under capacity in the rail network, and addressing infrastructure needs to promote more sustainable travel and sustainable development.

2.2 We would also welcome and support in principle promoting modal shift to public transport as a result of increased capacity, improvements to rail passenger services, and through improved integration with other elements of the public transport network.

2.3 There are also a number of local traffic and transport benefits of the Scheme that we support in principle.

2.4 However, we emphasise that there are elements of the above which are likely to have adverse impacts and raise important questions, some of a strategic nature and some more localised, and these issues should be examined thoroughly at the public inquiry.

We set out our concerns and arguments below.

### **3. Summary of CPRE Oxfordshire case**

#### **Water Eaton Parkway Station Proposals**

3.1 CPRE has significant concerns about protecting the Oxford Green Belt from development which threatens its openness and integrity.

#### **Impacts on the Green Belt**

3.2 Much of the development at and adjacent to Water Eaton is within the Oxford Green Belt. The creation and protection of the Oxford Green Belt as the unique setting of the historic city of Oxford has been one of the key achievements of CPRE Oxfordshire. However, there are constant pressures on this fragile area of land.

3.3 The Parkway Station proposals need to be carefully balanced against the environmental impacts on the Green Belt and have to meet the relevant planning “tests”. It is also important to examine how the development might impact on the Green Belt in the future if the new station proves to be a runaway success and there are pressures to expand.

3.4 The Water Eaton site has also become rather complex, with not only the OCC Park and Ride, the aggregates rail depot and recent permission to replace the grain silo with the Materials Recovery Facility (MRF), but now the proposal for a major Parkway Station/interchange to serve Oxford. CPRE is very concerned that, to make space for the station, the MRF may well be displaced to another Green Belt site and the aggregates rail depot will be relocated to an area of Green Belt agricultural land. We accept that removal of the disused grain silo is overdue, but regret that another piece of Green Belt will be sacrificed to achieve that.

3.5 In the Oxford Green Belt there is a policy presumption (PPG2) against inappropriate development. We would argue that the railway station buildings and associated uses, such as car parking and the relocated aggregates rail depot, would all have to be classed as “inappropriate development.”

3.6 Inappropriate development is considered by definition to be harmful to the Green Belt. Such development should not be approved, except where “very special circumstances” have been demonstrated, whereby any harm is clearly outweighed by other considerations. The submitted Planning Statement accepts it is a substantial development within the Green Belt, but is relying on the “very special circumstances” -ie benefits in delivering sustainable transport objectives.

3.7 CPRE would argue that, welcome though the rail improvements might be, is the proposed Scheme really the optimum outcome for the Green Belt in terms of its openness? – with new station structures, a large decked car park, the aggregates rail depot moved onto an area of Green Belt agricultural land – and no certainty about the MRF proposal.

3.8 We would argue that the scheme will also intensify the “urbanisation” of the relatively narrow gap of Green Belt between Kidlington and Oxford, with for example more urban structures in the landscape, greater vehicle activity, and increased light spillage at night.

3.9 One of the fundamental aims of Green Belt policy in PPG2 is to prevent urban sprawl by keeping land *permanently* open. And in terms of the *permanence* of the Green Belt at Water Eaton, we have to question whether sufficient consideration is being given to the likelihood of pressures to expand in the not-so-distant future - whether indeed this Scheme should be treated as phase one of a major transport interchange development and assess it accordingly.

### **Impact on existing Oxfordshire County Council (OCC) Water Eaton Park and Ride facility**

3.10 CPRE has serious concerns that the two facilities must be managed in a coordinated and integrated fashion to avoid the existing Park and Ride bus facility being overwhelmed by car parking demand for the new rail station. It is essential for Oxford’s transport system that adequate capacity is available for the bus users. Experience has shown that, as Oxford City Centre is so hard to access, the demand on non-central facilities is very high. We would cite the bus interchange facility at Thornhill Park and Ride. CPRE would argue that there are many critical issues to be addressed at Water Eaton in creating a major transport interchange for Oxford.

3.11 CPRE would argue that it is not at all clear how this will be managed from the information available. This raises serious questions about the viability of the Water Eaton proposals, namely whether there will be adequate parking capacity in short/long term, how the twin facilities should be managed and whether enough thought has gone into the planning of a major interchange and dealing with pressures for escalating parking demand.

### **Rail aggregates facility at Water Eaton**

3.12 CPRE notes this is one of only three rail depots in Oxfordshire for crushed rock and the only one close to Oxford. The Scheme proposes to retain the aggregates depot but relocate it further north alongside the railway to a new greenfield site in the Green Belt together with a new access road from the A4165 around the perimeter of the Park and Ride. We note “very special circumstances” would have to be demonstrated by Chiltern Railways to justify this. OCC stated in Sept 2009 “it is important that the rail aggregates depot is retained, in either its existing or a suitable nearby location, unless it can be demonstrated that there are other benefits which outweigh this”. CPRE is seriously concerned that the proposed new site would involve the further permanent loss of Green Belt, currently in agricultural use, to what is an industrial use.

3.13 We also gather that if the TWA Order were granted there would be deemed planning permission for the relocation of the aggregates depot and we would question whether it is appropriate for Chiltern Railways to seek deemed planning permission under the TWA for the benefit of another party – ie Hansons, the present aggregates operator.

### **Waste Materials Recycling Facility (MRF) at Water Eaton**

3.14 CPRE notes that the Water Eaton Parkway Station will in effect require the whole of the Grain Silo site, for which Grundons obtained planning permission in 2008 for a MRF waste facility subject to s.106 agreement, and this would prevent the implementation of the MRF. We understand the emerging Oxfordshire Minerals and Waste Development Framework (MWDF) has yet to determine whether the Grain Silo site would be a suitable strategic waste site.

3.15 We note Chiltern Railways' view is that the Water Eaton site is essential as the location for the transport facility and, as "very special circumstances" were demonstrated to justify the MRF at Water Eaton, this would "not necessarily preclude other (MRF) sites being deemed suitable within the Green Belt". It would be of serious concern to CPRE if the knock-on effect was to displace the MRF site and generate further inappropriate development elsewhere in the Green Belt.

3.16 OCC have raised concerns, stating in Sept 2009 it would be "strongly preferable for the Water Eaton Parkway Station to be developed in a way which allows for the provision of this important waste facility, unless it can be demonstrated that there are other benefits which outweigh this". Currently it is not clear what position this issue has reached and what the full implications are. CPRE contends this should be examined by the inquiry so that the planning position can be clarified.

**Wider impacts and pressures on Kidlington/Water Eaton/northern Oxford area from Oxford station.**

3.17 **Cumulative impacts** - We believe it is crucial to consider the cumulative impacts of a number of proposals which are coming forward and that this inquiry is the best means of doing that. It is fair to say that neither Cherwell District nor Oxford City have yet produced an up to date planning framework which addresses these matters meaningfully. Oxford is a very congested city despite good public transport and the area around the A34 is one of the most congested areas of the whole County, with transport issues that have been unresolved for years. These have recently considered at the Examination in Public of the Oxford Core Strategy which has yet to be completed.

3.18 **Potential expansion of the Parkway Station** - Providing a modern Parkway Station on the outskirts of the City will create a very attractive multi-modal transport interchange for commuters and other travellers. Given the demand for convenient public transport around Oxford and the drawbacks of Oxford's existing station, pressures will mount to expand to meet demands – either sideways or upwards, both with inevitable impacts on the Green Belt and the surrounding local transport network. It will tend to draw car drivers from a wide area. CPRE would argue that the longer term transport issues need to be adequately addressed as part of this inquiry.

**3.19 East-West Rail** - It is far from clear what additional impact the East-West Rail link would have on settlements at its western end such as Bicester and Oxford. Oxford will presumably be the principal destination and the only station with real capacity to expand would be Water Eaton. As far as we can see, little of this has been factored into the current thinking and we have serious concerns that increases in associated station/parking/highway capacity will have inevitable impacts on the Green Belt and the local transport network. CPRE would argue that these longer term issues need to be adequately addressed as part of this inquiry.

**3.20 Other local development pressures** – the Oxford City Draft Core Strategy has promoted the Northern Gateway development (around Pear Tree close to the A34 and Water Eaton) as a “strategic employment site” for several thousand jobs. This has proved very contentious and CPRE, amongst others, has objected on the basis it will stoke economic pressures in the City at a time when the emphasis should be on providing housing. It is evident that the combined effects on the surrounding local transport network (and A34 junction) of the Water Eaton Parkway Station/interchange and the Northern Gateway would be significant. It is not clear how this impact is being handled and CPRE has serious concerns that the issues are not being adequately addressed.

**3.21 Reconfiguration of local transport network** – CPRE believes that if the Parkway Station proposal goes ahead it is an excellent opportunity to undertake comprehensive improvements to the whole public transport and rights of way network in this area, including reconfiguring bus services, walking routes, cycling and horse riding routes, to boost sustainable modes of movement and improve access to the countryside. Local parishes and amenity groups are, we understand, making detailed representations and this has our support.

### **Bicester Town station**

**3.22** Strategically, we are in support of the improvements to Bicester Town station to promote better rail services at Bicester, and to provide a convenient station for Bicester Village outlet centre which generates huge amounts of private car traffic.

3.23 However, CPRE would argue that a number of practical issues have not yet been adequately resolved in terms of integrating it properly into the fabric of the town, namely:

- justification of 520 parking spaces and how this will impact on the existing public car parks and/or the surrounding area.
- adequacy of access arrangements generally, including to London Road, if 520 parking spaces are provided, and the feasibility of links to Bicester Village.
- integration of non car modes e.g. walking, cycling.
- potential conflicts with car parking at Bicester Village.
- effects of frequent closures of London Road level crossing on the local road network.

### **Islip Station**

3.24 CPRE notes the Scheme proposes that “Islip will remain a station principally for local community use, rather than a facility for the wider area”. We would welcome the continued use of the station to serve the local community but would not wish any major development in this isolated village location. It is understood that only a limited service would be provided by Chiltern at Islip to deter greater usage but we consider this would not necessarily put off those who would find it an attractive station in preference to others (where for example parking charges are imposed), and thus create pressures to improve the service and parking facilities - which Chiltern might find hard to resist. CPRE would argue these operational issues should be examined thoroughly at the public inquiry.

3.25 We understand that the Parish Council has made detailed representations about the level crossing and the design/impact of the proposed footbridge, and this has our support

### **Rights of Way Plans**

3.26 CPRE notes that this Scheme affects twelve Public Footpaths, two Public Bridleways and two public road crossings. We understand that a number of detailed Rights of Way issues along the route are not yet resolved and local parishes and groups have made detailed representations. Oxfordshire County Council for example has raised Oddington Footpath 6 and Islip Level Crossing. These concerns have our support. We welcome however the fact that provision appears to have been made for The Oxfordshire Way and for the Kidlington Circular Walk. Existing rights must not be brushed aside and new

works must be sensitive to the local environment. We trust the inquiry will consider these matters sympathetically and fairly.

### **Impacts of noise, vibration and pollution on local environments**

3.27 CPRE understands that along the rail route - particularly within the City of Oxford – local amenity groups and individuals have made detailed representations about adverse impacts on residents and their homes and amenities. These concerns have our support. We would trust the inquiry will consider these sympathetically and fairly.

### **Impacts on Natural Habitats, Archaeology and Cultural Heritage**

3.28 The submitted Environmental Statement has gone to considerable lengths to appraise these matters thoroughly. Bearing in mind the proximity of the line from Oxford Station to Water Eaton borders the Oxford Meadows, which is ecologically protected at National and European level, we presume Natural England has made a full appraisal. CPRE would argue that the implementation of the proposed works needs to be sensitive to the local environment, and wherever possible enhance the natural and built environment.

### **Restoration of land**

3.29 CPRE would emphasise that much of the area affected by the route is Green Belt and green field land, or close to local communities. CPRE would argue it is doubly important that, in sensitive environments such as these, all works of restoration are carried out to the highest standards.

### **CPRE Oxfordshire - August 2010**

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**Appendix: Documents we are likely to refer to**

**(NB We reserve right to add to this list as other material is published)**

- 1) Planning Policy Guidance 2 – Green Belts.
- 2) Policy documents quoted by Chiltern Railways in TWA submission.
- 3) Oxfordshire CC committee report on TWA application Sept 2009 and June 2010.
- 4) Cherwell DC committee reports on TWA application June 2009 and March 2010.
- 5) Oxfordshire CC committee report on Thornhill Park and Ride Expansion Jan 2009.
- 6) Oxfordshire CC consultation Thornhill Park and Ride Expansion May 2010.
- 7) ERM letter to CPRE Oxon re TWA objections 25 June 2010.
- 8) Oxford City Draft Core Strategy papers (Northern Gateway etc) 2009/10.