

Bladon Parish Council

Bladon Parish Council (BPC) wishes to submit the following comments for Deadline 3.

BPC is providing comments on the applicant's response to the ExA First Written Questions that concern the Food Growing Initiatives and Educational facilities, as well as providing comments/observations regarding PRoW's 132/4/10, the HGV routing plan and the consultation process related to food growing initiatives and education facilities.

The table below contains the ExA's original question, the applicant's response and BPC comments/observations. BPC other comments/observations follow after this table.

BPC Comments on Applicant's Response to ExA First Written Questions

	Q1.13.4 Applicant Community food growing areas
ExA Question	<p>Paragraph 16.9.17 of ES Chapter 16 [APP-053] states that the community food growing areas would benefit vulnerable groups and provide training to support growers, provide education opportunities for children and support mental and physical health benefits. As such, the implementation of these areas is stated as supporting positive health outcomes. Given the lack of information provided in respect of the proposed growing areas, for example location and how the areas would function, it is unclear how the above conclusions have been reached. Please provide additional detail to support the above conclusions.</p>
Applicant's Response	<p>The Applicant has signed a memorandum of understanding with two groups to operate on the land set aside for community food growing and is actively seeking more. The Cherwell Collective is a social enterprise working to support those in food poverty, connect people isolated in the community and reduce food waste and co2 emissions. They will establish food forests on the project site, a type of allotment. These enable those they support to learn how to grow their own food, get out of the house into the countryside, learn how to recover degraded land and make it productive without using chemical inputs – they call it permaculture. A Collective staff member teaches skills and supervises activities. The Collective has clients in the villages adjacent to the Project site and will establish food forests nearby to avoid car journeys. The Collective call this Harvest @ Home; they partner with schools to teach food-growing skills. Surplus food is shared with their community. The second group is run by Chris Goodall. He will establish a food growing enterprise run by a professional market gardener with volunteers providing the labour. He already does this at the Cutteslowe allotments in North Oxford. The food produced will be given to local food banks such as the Cutteslowe Larder to support those in food poverty. Both sites will be open for school visits, as will the solar site.</p>
BPC Comment	<p>BPC have noticed that the organisations currently proposed to manage community food growing projects are presently engaged with communities located some distance from those directly impacted by the proposal.</p> <p>Both groups serve North Oxford (including Kidlington and Cutteslowe), while the Cherwell Collective additionally supports areas in North Oxfordshire, such as Bicester and Banbury. However, the proposal does not clarify whether these services will be extended to communities nearer to the project site, particularly those situated within a different district.</p> <p>Clarification is requested regarding what assurances exist that these groups will support food banks and address food poverty in the communities affected</p>

	<p>by the proposal. If these communities do not receive support, it would be difficult to classify such initiatives as a direct benefit of the proposal.</p> <p>BPC has also noticed that proposed food growing areas are all located in the central area, and apart from the area near Church Hanborough, they are all within the Green Belt.</p> <p>The proposed areas are concentrated in Bladon and Church Hanborough, with an additional parcel of land off Lower Road just north of the A40 roundabout. These areas are shown on the Illustrative Masterplan Figures 2.2A, 2.2B, 2.2C (Document library ref AS-020).</p> <p>There are currently no proposed areas to serve the Cassington section of the central area, nor are there any proposed sites in either the southern or northern sections of the plan. BPC notes that it is unclear how communities in these areas will benefit from the proposed food growing sites.</p> <p>The applicant has also chosen to place most of the growing areas within the Green Belt, despite the presence of large areas outside the Green Belt, such as land west of Lower Road or land north of Woodstock off the A4260, that could potentially also offer better access.</p>
	Q1.16.8 Applicant Community food growing areas
ExA Question	<p>Paragraph 15.9.100 of ES Chapter 15 [APP-052] confirms that an area of up to 30ha is to be provided for community food groups. Please confirm how the scale of this initiative was decided upon. What consultation with local stakeholders was undertaken in respect of making the decision in terms of scale. How is the delivery of this community initiative to be secured and what scale of food production is anticipated to be provided. The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such areas is additional mitigation. Given that limited information has been provided in respect of these areas, please confirm what weight should be given to this by the ExA.</p>
Applicant's Response	<p>The Applicant consulted on the proposals at the Statutory Consultation and engaged in direct discussions with potential food growers throughout the pre application period. It was decided to place the areas close to settlements to reduce vehicle movements and to make access easy for villagers. The village of Bladon expressed interest in establishing an area for allotments, given current high demand and limited availability in the village. Cherwell Collective will start with five food forests and expects to build the operation from that base. Chris Goodall will take a three hectare area for production and expects demand from food banks to enable him to expand over time. Discussions were held with Good Food Oxfordshire, who run the OxFarmtoFork initiative. A tour of the site for food producers was organised on 20th June 2024 and a group looked at the areas set aside and took samples of the soil. All use agroecological methods and sell their produce directly to the Oxford Colleges. These growers will operate at larger scale than Cherwell Collective and Chris Goodall. The Applicant will fill all 30 hectares with food producers and expects this to have a significant effect on the volume of food the OxFarmtoFork system is able to deliver. Given the number of lives this could touch the Applicant would give this initiative moderate positive weight.</p>
BPC Comment	<p>In addition to the comments previously provided (Q1.13.4), BPC wishes to highlight to the ExA that it does not consider the OxFarmtoFork initiative to constitute a community benefit. The initiative appears to function primarily as</p>

	<p>a commercial enterprise facilitating connections between producers and Oxford Colleges. Currently, there is insufficient evidence to demonstrate how local communities, including affected businesses, would derive any direct benefit from this proposal.</p> <p>The applicants have also commented in this response that the locations chosen are close to settlements to reduce vehicle movements and to make access easy for villagers.</p> <p>However, it remains unclear how overall vehicle traffic will be reduced, as all proposed growing sites are concentrated within the central area, primarily in Bladon and Church Hanborough. Consequently, residents from other communities would still need to travel to these sites to participate.</p> <p>Furthermore, a significant portion of the growing areas will be managed by third parties based outside the development area. This arrangement is likely to draw volunteers and growers from beyond the Bladon and Church Hanborough area, particularly given the relatively small populations of these villages..</p> <p>BPC would like to inform the ExA that the Parish Council has not been informed or consulted regarding any interest in additional allotments within Bladon. To date, no approach has been made to the Parish Council on this matter.</p>
	<p>Q1.16.21 Applicant Education facility building</p>
<p>ExA Question</p>	<p>Please confirm how the possible location for the education facility was selected? What level of consultation was undertaken with local stakeholders in respect of the possible location? The Outline Operational Management Plan [APP-234] confirms that further detail in respect of the education facility is to be set out in the detailed Operational Management Plan. Please confirm why such detail is to be confirmed post-consent, rather than during the Examination. The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such an education facility to be additional mitigation. Given that limited information has been provided in respect of this facility, please confirm what weight should be given to this by the ExA.</p>
<p>Applicant's Response</p>	<p>Through discussions with the OCC team, an Education Facility was identified as an opportunity. Chapter 16 [APP-053] paragraph 16.9.133 includes the statement;</p> <p><i>“Provide open and covered space in the solar farm for use by school field trips. An educational area could provide local schools with the basic facilities – benches and a covered area to undertake their own learning activities. Potential to walk to the educational site and potential for guided access to array areas would support both physical activity and learning outcomes for population health. Indicative layout (as set out with Outline Operational Management Plan [EN010147/APP/7.6.2]) includes toilet (compost) and minibus parking (either provided or existing). Secured as a requirement of the DCO - via oOMP [EN010147/APP/7.6.2].</i></p> <p><i>Location, size and scale will be finalised during detailed design phase and included within the detailed Operational Management Plan. The educational area is illustratively shown in Figure 16.2: Illustrative 3D Views of Educational Facility [EN010147/APP/6.4]. The expectation is that there will be post consent</i></p>

	<p><u><i>community involvement in the refinement of design and selection of an appropriate location.</i></u></p> <p>A potential location was identified to the east of Bladon, on land adjoining existing community facilities (land next to a playground, MUGA, and allotments) and where there is a suitable vehicular and pedestrian access, which also serves the Bladon Primary School and the Parish church.</p> <p>In order to take this proposal forward, and to allow it to be considered as additional mitigation, it is now intended to develop the proposals through the submission of a formal Change Request. This is reflected in Change Request Notification 2, as submitted at Deadline 2.</p>
BPC Comment	<p>BPC would like to inform the ExA that the Parish Council has not been consulted regarding the proposed location of this facility.</p> <p>Had BPC been consulted, then the council would have raised concerns with the applicant about the current access route to the suggested location and the negative impacts a facility at this location may have on the community.</p> <p>The access road is limited to single-file traffic and does not have designated passing points. Additionally, a pinch point at the entrance further restricts the width, rendering the road inaccessible to vehicles such as ambulances and skip lorries. There has been an instance in which a resident required transport to an ambulance stationed on the main road due to these constraints.</p> <p>The use of this road as the main access point for either the educational facilities or the proposed community food growing area on the opposite side raises significant safety concerns for pedestrians. This route serves not only as the primary walking path to the recreation ground, allotments, cemetery, and St Mary's Church, including the grave of Sir Winston Churchill, but is also used daily by students and parents to access the only entrance to Bladon Primary School. Additionally, the school regularly utilises the recreation ground for physical education lessons, requiring groups of children to walk between the school and the recreation ground on a regular basis.</p> <p>Furthermore, visibility when entering the lane from the main road is limited, increasing the risk of vehicles encountering each other head-on and requiring one party to reverse onto the main road or another wider section, which presents additional safety concerns.</p> <p>BPC would like to understand the reasoning behind selecting Bladon as the location for a facility that does not appear to offer direct benefits to Bladon residents. BPC believes that any potential advantages for residents are likely to be outweighed by adverse effects on the village, including increased traffic and visitor numbers that will be using an access road that is already known to present challenges, as well as the potential disruption to the peaceful environment enjoyed by individuals walking along PRoW 132/2/10.</p> <p>BPC believes that there are other locations which would be more easily accessible, such as directly off Lower Road or A4260 North of Woodstock or a location in the Southern area and also would a location that is not within the Green Belt.</p>

In addition to the points raised above in comment to the ExA 1st questions, BPC also has the following comments/observations.

PRoW 132/4/10

It has come to BPC's attention that PRoW 132/4/10 would require permanent stopping up and diversion during construction and operation of the Project.

This is a beautiful and historic route, a mediaeval road from the top of Heath Lane across three large fields to Begbroke. It is widely used by walkers not only from Bladon but further afield, and BPC believe that to lose this PRoW would be a severe detriment both to Bladon and Begbroke Parishes.

HGV routing plan

Appendix 1 of the Outline Construction Traffic Management Plan (OCTMP), which is part of the Outline Code of Construction Practice (APP-232) contains a map illustrating the designated construction access route for the delivery of PCS units to the central site area. According to the plan, twenty PCS units are scheduled for delivery via Cassington Road. To facilitate this process, the applicant proposes that HGVs transporting the PCS units utilise the A4095 through Bladon to reach Cassington Road.

In addition to this, they are also routing HGVs to HDD compounds via the same route.

The rationale for this routing is detailed in paragraph 1.3.5 of the OCTMP: -

1.3.5 Construction vehicles must accord with the following:

- Due to a low bridge on the northern section of Lower Road, construction HGVs delivering PCS units:
 - Must arrive at accesses along Cassington Road / Burleigh Road / Yarnton Road via the A44 and the A4095 as they are unable to route under the low bridge.
 - Must depart accesses along Cassington Road / Burleigh Road / Yarnton Road via Lower Road as they are able to route under the low bridge.
- Due to a low bridge on the northern section of Lower Road, construction HGVs routeing to HDD compounds on Cassington Road / Burleigh Road must:
 - Arrive and depart accesses along Cassington Road / Burleigh Road via the A44 and the A4095 as they are unable to route under the low bridge.

It is recognised that the bridge north of Lower Road may have insufficient clearance for HGVs. However, BPC expresses concern that the applicant has not adequately considered the road configuration in Bladon, specifically the section between the White House Pub and Manor Road, which features a pinch point where the carriageway narrows. This location has frequently experienced traffic delays due to two large vehicles attempting to pass simultaneously. The referenced pinch point is depicted in images 1 and 2.

Lack of Community Consultation – Food Growing and Education Facilities

In addition to the comments above, BPC would like to inform the ExA that BPC have been contacted by Bladon residents and representatives of community groups who have raised concerns about the lack of consultation regarding the proposed provision of allotments, food growing initiatives, including their various locations within the parish, and the designated site for educational facilities. These communications indicate that, as well as not consulting with BPC, the applicant also appears not to have engaged with the wider Bladon community on these matters.