

Matter 4: Abingdon and Oxford Fringe Sub Area
Question 4.1 (c) East of Kingston Bagpuize with Southmoor
(in Fyfield & Tubney Parish)

Are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements — both general and site specific — justified, consistent with national policy and would they be effective?



The Fyfield Elm

Submission **No.1** by

Fyfield and Tubney Parish Council

and the Fyfield Land Action Group (FLAG)

In Support of Representation ID: 730255 (Dr Stephen Fraser)

Fyfield & Tubney Parish Council and FLAG wish to be represented at the Public Examination scheduled for 24th July 2018 pm by:

Mr John Bradley (ID 1095527),
Prof. John Cobb (ID 1095954) and
Mr Mark Baker (ID 1095180)

Why the proposed Lioncourt development of 600-700 homes on Fyfield Land East of Kingston Bagpuize (FLEKB) remains unsound

Fyfield & Tubney Parish Council and the Fyfield Land Action Group (FLAG) hereby submit two documents in support of our previous over-arching representation on the VoWH LLP2 with regard to the proposed Lioncourt development.

Appendix 1: A Summary of 50 issues where the proposed development fails to comply with the National Planning Policy Framework (NPPF), or contravenes the Strategic Objectives and Development Policies described by the District Council.

Appendix 2: A critical analysis of the representation made by the land agent, Savills, on behalf of the promotion agent, Lioncourt Strategic Ltd, and (indirectly) the landowner, St John's College, Oxford and their public relations company, SP Broadway.

Both documents are presented in **summary tabular form** to enable the Inspector to 'see at a glance' why this development site:

- Is out of proportion and a poor choice given that more sustainable sites are available;
- Requires considerable public investment in infrastructure to be even considered viable;
- Will have a significant, and even severe, impact on the local road network — and which cannot be realistically mitigated without re-routing a major trunk road;
- Is both questionably viable and vulnerable to an economic downturn in the economy;
- Is undesirable on environmental grounds;
- Is likely to be the 'straw that breaks the camel's back' when considered alongside other committed developments along the A420 corridor and where the cumulative traffic impact has been insufficiently addressed.

This submission, although comprehensive, is supported by others dealing with specific matters in more detail, e.g. the impact of additional traffic on the local road network. Nevertheless, we believe that this summarisation is essential to present the whole picture.

Sample of Representations to LPP2 in support (this is not an exhaustive list):

Person ID	Full Name	Person ID	Full Name
1095180	Mr Mark Baker, CBE	1098023	Ms Janine Elton
1095527	Mr John Bradley	730263	Mr David Groves (KBS PC)
1095325	Mr Brian Buchan	1145347	Dr Dimitrios Hatzis
1094354	Mr Keith Budgen, CBE	1142741	Mr Philip Hatzis
1095954	Prof. John Cobb	874560	Ms Helen Marshall (CPRE)
1098086	Mrs Shirley Collins	1142522	Mr Michael Pearce (Longworth PC)
730184	OCC Cllr Yvonne Constance	1095962	Mr Graham Varney
1144305	Mrs Winifred Cox	828535	Mr John Watts
1095676	Mrs Rebecca Dougall	1144426	Mr Alan Woodward

See VoWH DC Local Plan 2031 Part 2 Consultation Statement Appendix 3: Summary of Representations — particularly pages 208-211; and 215-237.

Endorsement for the Submission

The following neighbouring Parish Councils and local County and District Councillors have endorsed this submission:

Oxfordshire County Councillors

Ms Yvonne Constance	Shrivenham, Cabinet Member for Transport
Ms Anda Fitzgerald-O'Connor	Kingston & Cumnor (inc. Fyfield & Tubney)
Ms Judith Heathcoat	Faringdon, Deputy Leader of OCC

District Councillors

Mr Eric Batts	Kingston Bagpuize Ward
Ms Yvonne Constance	Ridgeway Ward
Mr Anthony Hayward	Thames Ward (inc. Fyfield & Tubney)

Parish Councils

Appleton & Eaton	Chair: Mark Richards	Clerk: Susan Blomerus
Ashbury	Chair: Kate Watkins	Clerk: Claire Arnold
Frilford	Chair: Shaun Forrestal	Clerk: Christine Antoun
Hinton Waldrist	Chair: Hugh Hamill	Clerk: Allison Leigh
Kingston Bagpuize & Southmoor	Chair: Brian Forster	Clerk: Sarah Bates
Longworth	Chair: Sandra Sabathy	Clerk: Gillian Carlisle

APPENDIX 1. Summary of 50 issues where the proposed development is ‘unsound’, as it fails to comply with the National Planning Policy Framework (2012), or contravenes the Strategic Objectives and Development Policies in the adopted VoWHDC Local Plan Part 1 (2016)

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
Chapter 2. Core Policy 4a: Meeting our housing needs					
1	Site selection	Fails to focus a significant development in a sustainable location	NPPF para.17	The settlement hierarchy outlined in LPP1 identified market towns as having the greatest long term potential for sustainable development. Land West of Wantage is an example of a market town site not included in LPP2 but better located and more sustainable than FLEKB which is either open countryside (if F&T) or a larger village (if KBS).	Dandara Cllr Y. Constance F&T residents
2				Not consistent with the adopted Spatial Strategy/Settlement Hierarchy. This scale of development is more appropriate adjoining ‘market towns’ or ‘local service centres’ and not ‘larger villages’.	
3		FLEKB — a ‘red flag’ on five out of seven metrics.	OGB	OGB rated the site unfavourably — negligible number of local jobs; jobs not accessible by public transport; and >75% of commuter trips will be by car. VoWH commented on FLEKB in the ‘ <i>Consultation Statement & Appendices</i> ’ pp. 31-35. The OGB conclusions and representations from F&T PC & residents were inadequately addressed particularly the impact of extra traffic from FLEKB and other KBS developments on the local road network.	FT PC & residents
4	Lack of need at this location	Does not contribute to Oxford’s unmet housing need.	LPP2 Table 2.1	Site excluded from those explicitly described to ‘meet Oxford’s unmet housing need’. Oxford University proposed three alternative sites closer to Oxford and considered FLEKB unsound because of distance .	Oxford University Cllr Y. Constance F&T PC & residents
5		Contributes only to VoWH arbitrary sub-area target.		Should be excluded from AOF and the quotient of 600-700 houses moved to a more sustainable sub-area (e.g. West of Wantage).	Dandara
Chapter 2. Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area. East of Kingston Bagpuize with Southmoor (Fyfield and Tubney parish)					
6	Wrong location	No strategic or policy basis for selection.	NPPF LPP1	Not compliant with NPPF sustainability criteria or LPP1 settlement hierarchy. Does not help meet Oxford’s unmet housing need.	Dandara F&T residents
7		F&T classified as open countryside .	VoWH stated aims	Would increase the size of Fyfield by >700%. Necessitates redrawing parish boundary to move FLEKB into KBS. This formal process has not been initiated by VoWH and might involve significant delays.	F&T PC & residents

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
8		Not suitable for London commuters.	SHMA	New methodology indicates Oxon is expected to need 68,000 more houses by 2031 not 100,000. The 30% difference suggests that need is not yet properly understood – or that the excess is assumed to meet London’s unmet housing need . FLEKB is not sustainable for that purpose.	CPRE Cllr D. Hallett F&T residents
9	Disproportionate in size.	600-700 houses is excessive .	NPPF para. 28	Fyfield comprises only 91 dwellings . The village would be swamped by FLEKB. If moved into KBS it would have other implications (see below).	F&T PC & residents
10		KBS has already contributed enough to VoWH target.		KBS will grow from 935 dwellings to 1728 since 2011 census when all committed builds (exc. FLEKB) are completed. FLEKB (700) would increase size by 160% since 2011 to 2428 dwellings and would be 2.5 miles long from one end of the village to the other.	KBS PC
11		Contrary to VoWH Leader’s assurances.	KBS PC minutes	Matthew Barber, Dec 2014, stated to KBS PC: <i>“Part 1 has been submitted, the Planning Committee is likely to reject further major development in the village ... Part 2 will follow identifying smaller sites across the District.”</i>	
12		Contrary to Inspector’s review of LPP1.	LPP1 Inspector’s report	The Bloor site (280 dwellings adjacent to FLEKB) was included in LPP1 with the Inspector’s comment that this was <i>“...a number appropriate to support the settlement’s role as a ‘larger village’.”</i> FLEKB would increase the size of KBS to 2428 dwellings or 160% since 2011. Inclusion of 700 extra dwellings in KBS is therefore inappropriate and disproportionate.	
13		A large commuter dormitory only.	LPP1 SO 8	FLEKB will be no more than a commuter dormitory disconnected from both KBS and Fyfield. It will have very limited facilities satisfying basic needs only. The site is not a basis for a ‘vibrant’ community .	F&T PC & residents CPRE
14	Local demand is satiated	KBS has already committed to 803 new dwellings since 2011.	HOU06 [1]	Many unsold three & four bedroom properties in KBS are currently on the market with many more yet to be completed. The VoWH report on Meeting objectively-assessed need for housing concluded that it is: <i>“... appropriate to be cautious about the assumptions over delivery from sites that could be perceived to be competing for buyers”</i> . [1] The deliverability of an additional 700 similar dwellings at FLEKB within 6 miles of competing developments is therefore questionable.	

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
15	Inadequate infrastructure	Public transport will be used by only 2% of commuters.	OGB RAG LPP1 SO 8 LPP1 CP 35	OGB Red: ~ 75% of commuter trips will be made by car. Savills acknowledge 83% of residents will travel to work by car and only 2% of residents will use public transport. The No. 66 bus services Oxford and Swindon only, not centres of employment growth. Travel by car will be essential to get to work, to access medical centres, and for anything other than basic needs. Fails to “ <i>support measures that enable a modal shift to public transport, cycling and walking in the district.</i> ”	F&T PC & residents Savills
16		P&R facility at Cumnor will not alleviate traffic at F&T and will be expensive.		Stagecoach state: “ <i>We are of the strong considered view that a dedicated bus service to the Cumnor Park and Ride site could not be economically justified at any stage, and would require significant ongoing public subsidy</i> ”	Stagecoach
17		Medical centre not included.	LPP1 SO 9	Lack of a medical centre at FLEKB would increase the burden on existing facilities in Abingdon and Faringdon. It is noted that CCG prefer to increase medical provision at these existing locations but the impact on local traffic has not been taken into consideration by VoWH.	F&T residents
18		Lack of community facilities.	LPP2 DP 8	VoWH state that the size of community halls should be at least 120 sqm/ 1000 residents for a large village. KBS hall is c.245 sqm and the population will increase to c.5000 residents if FLEKB is developed. The existing village hall will therefore be 50% of the size required by DP8. Furthermore, it should also be accessible within a 10 min. walk but is >20 min. from FLEKB. There is no provision for a developer to fund a larger village hall in addition to the inadequate and ill-defined ‘community hub’ proposed at FLEKB.	F&T residents
19		Primary school.		A one-form entry school would be inadequate given the size of other developments in KBS. Also, safe access to the school for children from Fyfield is not properly addressed.	
20		Traffic impact on local road network	OGB RAG Red	See separate Chapter 3. Transport section below.	Numerous representations

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
21		Cost of necessary infrastructure			OCC F&T PC & residents
22	Lack of local employment	Minimal number of jobs locally.	OGB RAG Red	Lack of jobs locally acknowledged by OGB. The Savills travel to work forecast relies on an implicit and unrealistic assumption of 150 jobs in KBS. [2]	F&T PC & residents Savills
Chapter 3. Housing					
23	Deliverability and viability	High cost of land is a threat to developer's profitability and ability to deliver affordable housing.		The average cost of land is now £1m/acre according to <i>Farmers Weekly</i> . It is no surprise that Savills wish to increase the size of the FLEKB development to try and ensure a minimal 17.5% profit margin for the developer. Cuts to infrastructure, the quality of build and further increased density are still likely. The landowner, St John's College, are unlikely to accept a discounted price for the land given their status as a registered charity.	F&T PC & residents Savills
24		Development could stall after phase 1.	LPP1 DP 47A	Adverse market conditions resulting in a half-built site of 400 isolated houses is potentially disastrous. Development plans give minimal details of the phasing strategy or what unlocks phase 2. No guarantee that the primary school will be built. DP 47A fails to provide adequate safeguards.	
25	Design principles	No evidence that LEKB will be built to the highest standards.	CP 37 & 38 DP17	No commitments to eco-friendly design principles; no public art; and no charging stations for electric vehicles. It should be noted that charging stations would add to electricity infrastructure costs if included.	F&T residents

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
Chapter 3. Transport					
26	Traffic impact on A420	Current traffic rates are running above capacity.	DfT	The capacity of the A420 at Fyfield is 1250-1300 vehicles/hr (vph) Eastbound in the AM peak. An extrapolation of the most recent (2012) DfT manual count data estimates of annual increase shows the A420 to be running at 1465 vph in 2017. A manual count by FLAG (2017) indicates the road is now running at 1585 vph or 8.2% above the estimate based on DfT data . Hindhaugh [3]: Section 6.2.7 supports this: "...the A420 is already above DfT theoretical operating capacity for a route of this nature."	Ashbury PC Longworth PC KBS PC F&T PC & residents
27		Baseline count is out-of-date.	DfT	Modelling the impact of traffic from major new developments must begin with a recent baseline manual traffic count, not a statistical extrapolation from a manual count last conducted in 2012 .	F&T PC & residents
28		Atkins states A420 and A415 already at capacity .		According to Atkins [5], even in the Do Minimum Scenario (not including FLEKB), the A420 and A415 are already at capacity. It is therefore assumed that this report was unavailable in time and that the earlier report by Atkins in 2014 informed LPP2 [4].	Highways England section 9
29		Cumulative effect of all KBS developments.		FLAG estimates that traffic on the A420 eastwards at the Fyfield bottleneck will be over-capacity at the AM peak by 43% by 2026 as a result of committed developments in KBS plus FLEKB [2]. In contrast, VoWH state: " <i>The Council is content that the proposed development will not lead to any significant highway impacts.</i> " [SOR, p.215]	F&T PC Ashbury PC Longworth PC
30		Trip Rates are inconsistent and should be viewed with a significant margin of error.		LPP2 relies on the Atkins [5] 'Rest of Oxon' trip rate of 0.816 departures over a 3hr AM period. Savills suggest a trip rate for departures based on an edge of town location in the AM peak of 1.182 over 3 hrs. FLAG have based their calculations on the trip rates proposed by Savills but suggest that this is still an underestimate for 'a commuter dormitory in a rural location'.	F&T PC
31		New roundabout on A420 will add to congestion at Fyfield bottleneck.		Two carriageways will merge into one within less than 200m from proposed new roundabout. Access to the A420 from Fyfield side road will be significantly more difficult and dangerous . It is estimated that in 2026, circa 2400 vph would be converging on this roundabout in the easterly direction during morning peak hours.	F&T PC & residents
32		Increased rat-running .		Increased rat-running is likely through Netherton, Fyfield, Appleton and Tubney . Drivers will avoid the new roundabouts because of delays. Atkins drew attention to the likelihood of increased rat-running on side roads. [5]	Appleton PC F&T PC & residents

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
33		The link road would create significant problems for residents of LEKB if adopted as the A415.		If (based on Savills estimates) the link road is adopted as the A415, and traffic from Witney and Faringdon to Abingdon diverts along it, then (in 2026 and excluding traffic from FLEKB itself), the AM peak hour traffic on this section would be c.710 vph travelling towards Abingdon and c.440 in the opposite direction, roughly one vehicle every 3 secs. A similar density of traffic is expected during the PM peak hour. It would be impossible to cross on foot and difficult to turn right onto from the estate. [2]	
34	Road safety on A420	A420 is the most dangerous road in SE England according to OCC and as reported in the <i>Oxford Mail & Times</i> .		OCC statistics reveal 595 accidents and seven fatalities between Jan 2012 and Aug 2017. Pharmagenesis, Tubney recorded five major incidents outside their premises in the 18 months from Jul 2016 to Dec 2017. There have been a further three fatalities in the vicinity in 2018. Fyfield and Tubney residents are reluctant to use public transport – the 66 bus – because of the difficulty of crossing the road . Many car drivers are also too scared to turn right onto the A420 from Fyfield towards Swindon and will take long detours instead.	Longworth PC Ashbury PC KBS PC F&T PC & residents F&T businesses
35	Traffic impact on A415	A415/A338 junction will not cope resulting in gridlock.		When all committed developments in KBS plus FLEKB come on stream the AM peak hr flow SE on the A415 at the Frilford traffic lights would increase to c.920 vph — an increase of 50% compared with 2016 (c.610 vph). [2] VoWH now require the developer of FLEKB to fund improvements to this junction but OCC state: <i>“It is not clear yet how the transport impacts at Abingdon and Frilford Lights will be able to be mitigated ...transport impacts work needs to be done before Examination hearings.”</i> <i>“The LPP1 ETI stated that the Frilford Lights junction on the A338 and A415 is at capacity. With additional growth at Kingston Bagpuize, Marcham and Dalton Barracks, it may become over capacity. A scheme for improving the junction was identified ... It is not known what the cost of this would be and whether it is deliverable.”</i>	F&T PC & residents OCC OCC
Chapter 4. Environment					
36	Pollution	Noise	DP 25	Savills and Lioncourt recognise noise from A420 will be a problem and propose mitigations for residents of FLEKB. No mitigations are offered or are conceivable for F&T residents who will suffer much more .	F&T PC
37		Light	DP 47	Fyfield enjoys dark skies once the few streetlights go out. Light pollution from the proposed A420 roundabout will impact severely on its conservation area. Low-level lighting is an insufficient mitigation for the loss of stars.	F&T residents

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
38		Air	DP26	<p>A proposal for 400 houses sited to the North-West of Marcham was discounted from LPP2 because of the AQMA. What is now being proposed is the equivalent of building 530 houses in Marcham.</p> <p>Savills estimate approx. 44% of traffic generated by FLEKB will flow to Abingdon and the A34 via Marcham — the equivalent of building some 300 houses. Additional already-committed developments in KBS would increase this number to 530. Given that the previous plan for 400 houses was sited where most residents would travel away from the village, then traffic from FLEKB and other KBS developments (approx. 2500 vehicles/day), sited to the South-West, will have a much greater effect on air pollution because it must pass through the centre of the village. [2] This contradicts the misleading VoWH response to Longworth PC in the Summary of Representations (p.211).</p>	<p>F&T PC</p> <p>Savills</p> <p>Longworth PC</p>
39	Loss of good farming land	The land is Grade 2. Planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.	NPPF para. 112	<p>Ignores specific guidance to look elsewhere — Land West of Wantage is understood to be Grade 3 and therefore preferable for development.</p> <p>Once it is gone it will be lost forever.</p> <p>Michael Gove stated at the Oxford Farming conference: <i>“So the imperative to husband, indeed wherever possible, enhance our natural capital — safeguarding our oceans, cleaning our rivers, keeping our soils fertile, protecting biodiversity — has to be at the heart of any plan for our country and our world.”</i></p>	<p>F&T PC</p> <p>Dandara</p> <p>CPRE</p>
40	Lack of planned mitigations	A415/A338 junction.		Impossible to see how this could be improved significantly to cope with 50% or more traffic estimated by FLAG. [2]	
41		No safe pedestrian crossings of A420 at F&T to access bus stops.		Not planned. No funding — except at new roundabout on A420 where an unsignalled crossing is proposed. In what sense is this a ‘safe crossing’?	
42		A420 road noise affecting F&T.	SO 4	Not planned. No funding — except for impact on residents of FLEKB development.	F&T PC & residents
43		A420 F&T bottleneck.		Single carriageway; no real or desired prospect of dualling. Access and egress difficult and unsafe.	F&T PC & residents
44	Urban creep in a rural setting	Closes gap between two settlements.	DP 29	The gap between KBS and F&T will close to approx. 300 metres.	F&T PC & residents
45	Conservation area	Light pollution.	DP 47	Ignores light pollution from new A420 roundabout on Fyfield conservation area.	F&T PC & residents

	Area of concern	Reasons	Ref.	FLAG Comments	Representations
46	Corallian Ridge	Under-estimates landscape & ecological factors	SP NE7 CP 44	FLEKB is located on the Corallian Ridge . CP 44 is being ignored.	F&T PC & residents
47	Biodiversity	No plan for active management and how this would be paid for.		The site supports populations of Lapwings, Skylarks and Corn Buntings, all red-listed by the RSPB (official DEFRA reference). All are threatened by loss of suitable habitat. Other species of concern are also present on, or within 1km, of the site, including Slow Worm, Grass Snake and Brown Hare. The six listed species are all priority species in the UK Biodiversity Action Plan (BAP) used to inform DEFRA's Joint Nature Conservation Committee.	F&T residents
48	Flooding	Effect of flooding under-estimated.		Flooding is a regular occurrence in the vicinity of Woodhouse Farmhouse , Fyfield. Unmitigated run-off from FLEKB is a concern. Suitable mitigation at this location is a necessity as a result of FLEKB but seemingly ignored..	KBS PC F&T PC & residents
Miscellaneous					
49	Lack of engagement with local community	Requests to engage with F&T PC were ignored or declined until a few days before LPP2 consultation phase 2 closed.	VoWH Statement of Community Involvement. NPPF para. 155	Petition signed by 98% of people living and working in F&T objecting to the FLEKB development is acknowledged but otherwise ignored. <i>"To be honest, this is not for Fyfield."</i> – Andrew Maxted, Planning Project Lead for VoWH, 21 March 2017, Southmoor Village Hall. LPP2 falsely represents that responses to the consultation process have been sufficiently addressed.	F&T PC & residents
50	Climate change	Encourages use of cars and does not reduce greenhouse gas emissions. Does not promote use of renewable energy.	SO12 CP41 NPPF para 95 EIA of LPP2	14% higher annual CO2 burden associated with transport per capita in VOWH due to unnecessary extra mileage; at least three times CO2 burden of someone using public transport, cycling or walking (e.g. in Oxford). Scale of FLEKB too small for economies of combined heat & power which would be possible in somewhere like Dalton Barracks if mixed use.	F&T resident
51	Cumulative effects of developments given insufficient consideration	Decisions are too site-specific.		VoWH has a duty to consider the cumulative implications of the several, and, sometimes adjacent, developments along the A420 corridor for the quality of life in this part of Oxfordshire. This is not apparent. Traffic volumes, delays to journeys, road safety, air, noise and light pollution all combine with the prospect of inadequate infrastructure to indicate that the A420 corridor has seen enough development already.	

Abbreviations

AOF	Abingdon and Oxford Fringe sub-area
AQMA	Air Quality Management Area.
CCG	Clinical Commissioning Group
CP	Core Policy (as defined in LPP2).
Dandora	Refers to the Representation made to LPP2 by Dandora Ltd.
DfT	Department for Transport [Guidelines].
DP	Development Policy (as defined in LPP2).
ETI	Evaluation of Traffic Impacts
F&T	Fyfield and Tubney. See in particular pp 215-237 of the Summary of Representations.
FLAG	Fyfield Land Action Group.
FLEKB	Land East of Kingston Bagpuize (site KBAG_A)
KBS	Kingston Bagpuize With Southmoor.
Lioncourt	Lioncourt Strategic Ltd, promotion agents for site FLEKB.
LPP1, LPP2	VoWH Local Plan, Part 1 or Part 2.
OCC	Oxfordshire County Council.
OGB	Oxford Growth Board.
P&R	Park & Ride
PC	Parish Council.
pcu	Passenger Car Units. FLAG traffic survey assumes a weighting for HGVs of 2.3.
RAG	Red Amber Green analysis.
Savills	Refers to the Representation made to LPP2 by Savills, Land Agent for St John's College, Oxford.
SHMA	Strategic Housing Market Assessment
SO	Strategic Objective.
SOR	Summary of Representations to LPP2
SP	Saved Policy form LPP1
TP	LPP2: Topic Paper
VoWH	Vale of the White Horse District Council
vph	Vehicles per hour

References

- [1] VoWH Report HOU06. *Meeting the 'Objectively Assessed Need' for Housing* [Sept 2014].
- [2] FLAG Technical Note. *Cumulative Impact on Traffic Due to Committed and Proposed Housing Developments in the Fyfield and Kingston Bagpuize-Southmoor Area* [Prof. John Cobb, 2018].
- [3] Representation to VWHDC Emerging Plan May 2013. *Transport Route Congestion Assessment on A419/A420/A415 Link on Behalf of Western Vale Villages Consortium of Parish Councils*. [Bob Hindhaugh Associates Ltd, 2013].
- [4] *Evaluation of Traffic Impacts, Study To Inform the Vale of White Horse District Council Plan 2031 Part 1: Strategic Sites and Policies, Final Report*, Oxfordshire County Council [Atkins, 2014].
- [5] *Topic Paper 5 of Vale of White Horse District Council Plan 2031 Part 2: Evaluation of Transport Impacts*, Oxfordshire County Council, Version 1.0, Oct 2017 [Atkins, 2017].

APPENDIX 2. Review of the Lioncourt (Savills) Representation to LPP2 (ID 1097637) with regard to the proposed development of 600-700 houses and a care home on Fyfield Land East of Kingston Bagpuize (FLEKB or KBAG_A)

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
1	Main representation	Lioncourt supports Kingston Bagpuize with Southmoor (KBS) as one of the main focusses for housing growth.	The site is currently located in Fyfield & Tubney (F&T) parish, not KBS, and is classified as ' open countryside '.	Requires redrawing parish boundary . This formal process has not been initiated by VoWH and might involve significant delays.
2		Amend Policy 8a: LPP1 classified KBS as a larger village and in accordance with NPPF should be a location for growth.	KBS is characterised in LPP1 as being less sustainable and benefitting from only a limited range of employment, services and facilities.	KBS has already doubled in size, further growth on the scale proposed is unsustainable.
3			Conflicts with a core principle of NPPF to focus significant development in locations which are sustainable.	Biased site selection. LPP1 identified market towns as having the greatest long term potential for sustainable development. Land West of Wantage is a prime example of such a site, yet is not included in LPP2. See: Dandara Ltd Representation.
4			The Bloor site (280 dwellings) adjacent to FLEKB was included in LPP1 with the Inspector's comment that this was "...a number appropriate to support the settlement's role as a 'larger village'."	An extra 700 dwellings would increase the size of KBS from 935 to 2428 dwellings since 2011. It is therefore inappropriate and disproportionate. KBS has already contributed its fair share to VoWH targets.
5		Amend Policy 4a: Figs 2.1 & 2.2. Increase number of dwellings from up to 600 to up to 700 .	A 70-bed care home is also now proposed and is additional to 700 dwellings.	Inconsistent with request to increase number of dwellings <u>up to</u> 700.
6		Lioncourt has engaged extensively with the community.	This is an untrue statement. Engagement has been minimal. No engagement with F&T PC who tried to arrange a meeting which was declined until after the consultation period closed.	See: F&T PC Representation on Lack of Engagement. Section 2.
7		Engagement with residents: 60% of the attendees at a public exhibition who gave feedback support the relief road.	60% of 135 attendees from KBS and F&T supported the relief road — i.e. just 79 people. The sheer weight of representations from F&T since the exhibition are testament to local opinion.	Petition signed by 98% (over 300 residents) of F&T opposing the relief road and the development.

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
8		Engagement with community groups: Lioncourt have met with a wide range of community groups.	An exaggeration. There have been no enquiries about community groups in either Fyfield or Tubney (e.g. FLAG).	Insufficient engagement.
9		Not specifically stated.	There is an implication that the site helps to meet ' Oxford's unmet housing need '.	VoWH do not include the site as suitable for meeting Oxford's unmet housing need. See: LPP2 Table 2.1.
10		The Environmental Impact Assessment (EIA) indicates "NO2 concentrations ... within and outside of AQMAs were below the relevant air quality objectives."	Paragraph 14.4 of the Scoping Report reviews monitoring data applicable to the Radcliffe on Trent area.	The reference to an area not in Oxfordshire and unrelated to FLEKB indicates the report is something of a 'cut and paste' job.
11	Appendix 1.0 Development Framework Plan	Main vehicular access into the site is provided via a relief road for KBS.	The claim that this is a relief road for KBS is disputed. It is an access road to the site only.	See: comments on Transport Assessment Scoping Note (TASN), May 2017, para. 3.5.
12		The eastern relief road could provide potential access spurs eastward into the adjacent land at the fruit farm , should future development require it.	Further evidence of potential urban creep in a rural setting which would effectively eliminate the gap with Fyfield.	Development Policy 29 Developments should not diminish the physical and visual separation between two separate settlements.
13	Appendix 2.0 Development Framework Design Commentary	See masterplan.	No commitment to eco-friendly design principles; no public art; no charging stations for electric vehicles . Lack of detail re: design and build standards. No encouragement given to use of electric vehicles given govt's stated intention to phase out internal combustion engines by 2040.	Core Policies 37 & 38. New development should be provided to the highest quality standards. Providing charging stations would add to electricity infrastructure cost.
14			Community focus limited to basic retail/mixed use (unspecified) facilities. This is insufficient for a housing development of this size and has implications for the rest of KBS.	Development Policy 8 A total of 2438 dwellings and a population of approx. 5000 needs a village hall twice the size of the present one. This additional infrastructure cost has not been addressed.
15	Appendix 3.0 Phasing Plan	See Phase 1 & 2 plan.	Development could stall due to market conditions. A half-built site would be disastrous. Questions exist about viability . Documents give minimal details of the phasing strategy or what unlocks phase 2 .	Development Policy 47A Phase 1 (some 400 houses) must be sustainable in isolation. Policy fails to offer sufficient safe-guards in the event of an economic downturn.

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
16			No guarantee that Phase 2 will be completed.	Primary school and other elements of infrastructure may not be delivered.
17	Appendix 4.0 Air Quality Technical Note	Pollutants expected to remain well below the annual mean objectives ... Results indicate that development-related traffic will lead to a 'negligible' impact ... at existing receptor locations.	Location of ' receptors ' not specified other than at 'key locations'. This would seem to be a desk exercise only.	Development Policy 26. Lack of clarity. Receptor sites need to include: Tubney , where houses front on to the A420.
18			No evidence that new A420 roundabout will have a negligible effect on emissions near Fyfield.	Fyfield: where the new roundabout will be located.
19			Additional traffic from site will negate the decision to discount 400 houses at Marcham from LPP2 because of the AQMA .	Marcham: where traffic from the site will generate air pollution. This is estimated to be the equivalent of building 300 houses locally or 530 houses if all other committed developments in KBS are considered. <i>See:</i> Representations from F&T PC; Longworth PC; Dandara, etc.
20	Appendix 5.0 Noise Technical Note	Noise recognised as a problem for FLEKB residents and site-specific mitigation measures proposed accordingly.	Ignores the effect of additional traffic on F&T which already suffer badly from noise pollution. No mitigations proposed at these locations. Mitigations at adjacent Bloor site resemble Alcatraz.	Development Policy 25. Suitable mitigation for F&T from additional site traffic is essential and should be subject to a Section 106/CIL agreement.
21	Appendix 6.0 Drainage & Flood	Flood risk is low.	Flooding is a regular occurrence in the vicinity of Woodhouse Farmhouse , Fyfield. Unmitigated run-off from the Lioncourt site is a concern.	Flood assessment inadequate. <i>See:</i> Representation from Graham Varney. Suitable mitigation at this site is a necessity.
22	Appendix 7.00 Summary: Initial Geo- environmental Assessment	There are service restraints and the potential risk of UXOs.	Agreed.	
23	Appendix 8.0 Landscape, Ecology, Heritage, etc.	No significant landscape or ecological problems.	Site lies on the North Corallian Ridge (NCR) . The consultants identify the key features of the NCR (paras 2.10 and 2.11) and then ignore the fact that FLEKB is incompatible with them.	Core Policy 44 fails to give sufficient protection to the NCR. <i>See:</i> representation from F&T PC

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
24	Appendix 8.0 cont.		Biodiversity enhancement: no plan for active management and how this would be paid for. The site supports populations of Lapwings, Skylarks and Corn Buntings, all red-listed by the RSPB (the official DEFRA reference). All are threatened by loss of suitable habitat, i.e. open farmland. Other species of conservation concern are also present on, or within 1km, of the site, including Slow Worm, Grass Snake and Brown Hare. The six listed species are all priority species in the UK Biodiversity Action Plan (BAP) used to inform DEFRA's Joint Nature Conservation Committee.	Required by LPP2 Detailed Policies and Additional Sites Appendices, p.20. See: Representations from John Cobb and BBOWT.
25		Does not affect Fyfield conservation area because of distance from site.	Ignores light pollution from new A420 roundabout on Fyfield conservation area.	Development Policy 47. Soundness depends upon mitigations. See: Representations from Brian Buchan and John Cobb.
26		Agricultural land is typical of the area and should not form a material constraint to development.	Most of the the land is classified Grade 2: Very good. Once it is gone it is lost forever.	See: CPRE representation. Ignores specific guidance to look elsewhere.
27	Appendix 9.0 Transport Position Note	OCC require a Traffic Assessment.	Should have been done prior to the publication of LPP2 for this sensitive site to be included.	DfT Guidelines. Baseline must rely on a contemporary traffic survey not an extrapolation from the last actual TS conducted on the A420 in 2012.
28			As above.	Modelling should include the cumulative impact of all new developments along the A420 corridor on the local road network and not just from the Lioncourt development.
29		Site likely to generate 348 vehicles in the AM and 340 in the PM peak hour.	Key Transport Consultants based their report on up to 600 houses and a two form entry school. <i>[Figures quoted are also at odds with those in detailed scoping note below]</i>	Given the latest proposal for 700 dwellings and a 70-bed care home the figures quoted are out-of-date and cannot be considered sound and reliable.

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
30		Section 3, p.7: Journey to work development traffic predicted (Sept 2017) to be 33% to Oxford (A420) and 40% to Abingdon (A415).	At odds with Transport Assessment Scoping Note (May 2017) section 3.35 and Table 4.5 where 41% of traffic is predicted to go to Oxford (A420) and 38% to Abingdon (A415).	Revised assumption that travel to work in KBS will increase from 7% to 13% is unrealistic. Evidence of a significant margin of error .
31	Appendix 9.0 cont.	Personal Injury Accidents to be obtained from OCC and not included here.	The Oxford Mail and Times have both quoted OCC data regarding the A420 and concluded the A420 was the most dangerous road in SE England . Three more serious accidents since (Mar-May 2018) have resulted in three fatalities and road closure.	A420 safety is now a serious concern to several OCC councillors and the local MP. The Lioncourt development is regarded as the straw that might break the camel's back .
32	Transport Assessment Scoping Note (May 2017)	1.2 Proposal originally based on 'up to' 600 dwellings and a two-form entry school.	700 dwellings and 70-bed care home now envisaged.	Proposal non-viable as originally stated. See: Representations by F&T PC, John Bradley, John Cobb and others.
33			School now a one-form entry only in first instance. It is in F&T parish but no thought given to how the school can accommodate children from Fyfield, particularly given the problems with safe access across the A420.	A one-form entry school is likely to be inadequate considering the size of other developments in KBS. Road crossing safety not sufficiently addressed for Fyfield children.
34		3.3 Traffic Surveys undertaken.	No TA undertaken for this site to-date. Surveys quoted relate to other smaller KBS developments.	Full OCC-led TA necessary to prove soundness of cumulative traffic impact on local A420/A415 road network.
35		3.10 Committed and proposed developments in KBS yet to come on stream total 1253 dwellings plus two care homes.	Adjacent Bloor site (280 dwellings) was included in LPP1 with the Inspector's comment that this [alone] was appropriate for a village of this size.	Inclusion of 700 extra dwellings in KBS is, inappropriate and disproportionate.
36		3.22 Existing pedestrian crossing of the A420 will be replaced with a new pedestrian/cycle link at the proposed roundabout.	There is no existing marked crossing. Footpaths and gateways exist on either side of the road but no road marking to indicate this is a crossing to car drivers.	No indication provided of what constitutes a 'safe' crossing at the new roundabout on the A420.
37		3.29 Traffic Growth Rates . Table 4.1 shows that traffic will increase on principal roads by 20% before the development will be completed in 2026.	The A420 is currently running at or above capacity in peak hours. A 20% increase between now and 2026 will cause, potentially, a severe problem.	Traffic from the site will exacerbate anticipated problems. For soundness, a full TA ought to have been undertaken before including this site in LPP2.

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
38	TASN (May 2017) cont.	3.30 Trip Rates. Based on Residential – Houses privately owned; weekday surveys; edge of town locations. E.g. AM Outbound 0.394 per dwelling.	Not an edge of town location. This is an edge of a rural village with few local employment opportunities. The development will be overwhelmingly populated by commuters, including London commuters.	Trip rates are probably an underestimate. See: F&T PC Representation para 1.6 and other representations including John Bradley and John Cobb.
39		3.32 Table 4.3 Development Traffic Flows. No. of vehicles in the peak hr: AM outbound 236; PM inbound 199.	Figures based upon 600 dwellings not 700. If based on latter the flow would be AM outbound 276 and PM inbound 232 on a pro rata basis.	Unreliable data.
40		3.35 Table 4.5 Proposed Development Traffic Distribution. Estimates: 41% East on A420 (Oxford) and 38% SE via A415 (Abingdon). [See below for Savills Technical Note dated 21 Sept 2017: Trip Rates & Trip Distribution – based on 700 dwellings].	Applying these percentages to 700 dwellings indicates that 113 vehicles would join the A420 (E) and 105 would use the A415 (SE) in the AM peak hour. If the same percentages are applied to all the new developments in KBS (committed + Lioncourt) of 1,253 dwellings (we include 180 dwellings currently on hold at Springhill, as do Savills in para 3.12), the AM peak hr outbound would see 203 more vehicles using the A420(E) and 188 using the A415 (SE). Other developments at Gt Coxwell (400), Faringdon and elsewhere along the A420 corridor also need to be included in the figures to determine the cumulative effect.	The 2017 TA by Atkins for OCC clearly states (p.34) that the A420 eastbound under the 'Do Minimum' scenario (i.e. exc. Lioncourt) would be at capacity in the AM peak. DfT guidelines regard 1270 vehicles/hr as the capacity benchmark for a single-carriageway rural A road. FLAG's traffic survey indicates that the road is currently running at 8-12% higher than DfT estimates. The cumulative impact, as at 2026, of the estimated growth in 'background' traffic (traffic originating from outside the area) plus that from committed and proposed developments (i.e. Lioncourt) would be to increase the morning peak hour traffic on the eastbound single-carriageway of the A420 at Fyfield to c.1850 vehicles/hr – or 43% above capacity. Given the cumulative effect of further developments along the A420 corridor yet to come to fruition, FLEKB cannot be considered sound. No indication of how the Frilford lights (A415/A338 junction) can cope with a 50% increase in traffic.

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
41	TASN (May 2017) cont.	3.36 & 3.37 Travel Mode to work. Table 4.6. Estimates that 83% of residents will travel to work by car and only 2% will use the bus. It also says 1% would travel by train.	This gives the lie to the claim by VoWH in LPP2 2.46 (and SO8) that the Lioncourt site has good public transport links and helps to 'minimise the need for car travel.' The reference to train travel from the site, where no station exists, indicates an inattention to detail and the folly of relying on generic modelling parameters.	NPPF: Need to travel by car should be minimised and the use of sustainable transport modes maximised. See: F&T PC Representation on Traffic Impact, section 3, highlighting the difficulties of relying on public transport to access centres of employment from this site.
42		3.50 Dealing with traffic transferring to the new ' relief road '. It states: "... in the morning peak hour ... it is considered unlikely that south-east bound through traffic on the A415 originating from the A420 (west of KBS) will divert to the new road ... It is assumed that this traffic will remain on the A415."	Given this assumption by Savills, in what sense is the new road a 'relief road'? The link road between the two new roundabouts is no more than an access road. It will clearly do little to divert through traffic.	The relief road is just an access road and will not ease traffic on the A420 or through KBS.
43			Assuming the link road becomes the A415 and the traffic from Witney and Faringdon to Abingdon diverts along it, then (in 2026 and excluding traffic from the development) the AM peak hour traffic on this section would be 718 vehicles per hour travelling towards Abingdon and 442 in the opposite direction, roughly one vehicle every 3 seconds. A similar density of traffic is expected during the PM peak hour. It would be impossible to cross on foot and difficult to turn right onto from the estate.	If the link road is used by through traffic as a relief road it will be a major problem for FLEKB residents who need to access it. This would be similar to the problem currently faced by Fyfield residents who need to access the A420 (W) towards Swindon.
44			The new roundabout on the A420 will encourage more rat-running through Netherton, Fyfield, Appleton and Tubney in order to avoid delays.	Exacerbates problems at Fyfield bottleneck . Dualling the road at this location is not an option. No mitigations proposed. See: Representations by F&T PC and Appleton PC. Also: LPP2 Evaluation of Traffic Impacts [Atkins 2017].

The following sections of the Lioncourt representation are of particular concern to residents of Fyfield, Netherton and Tubney

	Section	Savills' Comments	Fyfield Land Action Group (FLAG) comments	Issues
45	Technical Note (21 Sept 2017): Trip Rates & Trip Distribution [response to OCC on TASN May 2017]	Following discussions with OCC the TASN, May 2017 has been revised to incorporate 700 dwellings.	See comments on TASN May 2107 above.	Based on trip rates and trip distribution described in the TASN, traffic on the A420 eastwards will be over-capacity on the A420 in 2026 at the AM peak by 30%. Margins of error are so significant that a more robust traffic model is required to be sound.
46		13% and not 7% of traffic now assumed to be directed to KBS.	There is no obvious explanation for this alteration other than to reduce the percentage of traffic using the A420 and A415.	Implies approx.150 new jobs available in KBS. This is unrealistic . Based on Atkins, VoWH are planning 21,748 dwellings and 26,379 new jobs so 1.21 jobs/dwelling: 13% x 700 x 1.21 = 110 jobs in KBS 13% x 1253 x 1.21 = 197 jobs in KBS

Matter 4: Abingdon and Oxford Fringe Sub Area

**Question 4.1 (c) East of Kingston Bagpuize with Southmoor
(in Fyfield & Tubney Parish)**

Are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements – both general and site specific – justified, consistent with national policy and would they be effective



The Fyfield Elm

Submission **No. 2** by

Fyfield and Tubney Parish Council

and the Fyfield Land Action Group (FLAG)

In Support of Representation ID: **730255** (Dr Stephen Fraser)

Fyfield & Tubney Parish Council and FLAG wish to be represented at the Public Examination scheduled for 24th July 2018 pm by:

Mr Mark Baker (ID 1095180) and
Mr John Bradley (ID 1095527)

1. Inappropriateness of the Site and Availability of Reasonable Alternatives

This note is intended to be read in conjunction with our comprehensive representation on Core Policies 4a and 8a submitted in response to the VoWH LPP2 and with Appendix 1 to Submission 1. It supplements that representation with additional points arising from information that has come to our attention in the intervening period.

In its summary of representations the District Council (DC) has not responded effectively to our representation, relying on claims to have carried out due process rather than refuting our specific arguments. Most if not all of our criticisms remain valid and in many cases they have been reinforced.

1.1 Spatial Strategy and Sustainability

The DC continues to treat Site KBAG_A, Fyfield Land East of Kingston Bagpuize (FLEKB), as if it were already part of Kingston Bagpuize and Southmoor (KBS), despite the fact that it lies in Fyfield and Tubney which is open countryside in the DC's Settlement Hierarchy, **and should have been ruled out of consideration on that ground alone.**

The DC's misleading description of FLEKB as Kingston Bagpuize and its claim that it is 'contiguous with KBS' depend on creeping coalescence, since it lies next to the 280 houses allocated on the eastern boundary of KBS in LPP1.

Even on that basis, the allocation **fails the tests of spatial strategy and sustainability.** In approving that allocation of the 280 houses, the Inspector felt it necessary to confirm that a development of that size was 'a number appropriate to support the settlement's role as a 'larger village''. KBS had 935 houses at the time of the 2011 Census; some 510 dwellings on unallocated sites have been built or approved since then. The 280 houses allocated in LPP1 take the total increase to 85%, with no net increase in infrastructure (two mini supermarkets are under construction but two out of three public houses have closed).

Approving the 700 houses would take the total to 2425, an increase of 160%. That is **incompatible** with the **NPPF's core planning principle of focussing significant development in locations which**

are or can be made sustainable and with the DC's aspirations (see LPP1 Figure 4.1) to maintain 'vibrant communities' and the 'vitality and the sustainability of local services'.

The accumulation of 980 houses in two massive commuter dormitory suburbs at the eastern end of KBS is inappropriate. The 'village' of KBS will have a continuous built length of over 2 miles if FLEKB is approved, and the description of KBS in LPP2 as a **sustainable** larger village will not hold.

We do not believe that the Inspector could have found the aggregated increase of 980 houses appropriate to a large village if FLEKB had been in prospect at the time of his report, or that he would have condoned the use of proximity to the 280 houses as an argument justifying the 700.

The location and scale of his proposed major housing allocation is completely inconsistent with the Settlement Hierarchy, as set out in Core Policy 3 of the Vale of the White Horse Local Plan Part 1. This places Kingston Bagpuize with Southmoor in the 'third category' (larger village) which is defined as a settlement with a more limited range of facilities. This 'third category settlement' was certainly not intended to be expanded to accommodate approximately 1,000 new homes. It seems extraordinary that the DC is willing to discard its own Spatial Strategy and Settlement Hierarchy –endorsed by the Inspector's report on LPP1 – in promoting a disproportionately large aggregation of development away from the Market Towns or Service Centres that could sustain it.

1.2 Distance from employment – conflict with Vale Strategic Objective SO 8 and LPP1

FLEKB's remoteness from places of work is confirmed by Tables 4.4 and 4.6 of the Transport Update submitted by the developer's agents, Savills (ID74828) as Appendix 9 of their representation. Only 13% of KBS residents worked in the village at the time of the 2011 Census and 74% of workers travelled to work by car. (The Savills Update is wildly optimistic in thinking that 13% of new residents will also work in the village, since work opportunities in the village will not keep pace with the growth of housing). Only 2% of workers in 2011 went to work by bus and Savills quote the same percentage in their representation to LPP2. This demonstrates the absurdity of paragraph 2.46 of LPP2 as a justification of the site.

Travel to the main employment centres from Fyfield is more problematic than, for example, getting to Oxford from Didcot (or vice versa) and we do not understand why the District Council decided to abandon the assumption in LPP1 (endorsed by the Inspector) that the Southern Vale should be recognised as contributing towards Oxford's unmet needs.

1.3 Infrastructure, Viability and Effectiveness

Our doubts about viability and infrastructure appear to be justified. First, the developer has raised the proposed number of homes from 600 to 700 (with 70 care places), reflecting the financial challenges we described in section 4 of our representation. Second, the County Council (ID 928610) has said that the costs of the roundabouts and access road have been significantly underestimated. It has drawn attention to the need to secure contributions towards enhancing the junction between the A415 and the A338 at Frilford. The County Council also points out that all infrastructure costs are necessary to meet the requirements of the development and do not contribute to the consequent infrastructure requirements in neighbouring vicinities.

1.4 Impact of Traffic arising from committed and proposed developments

Since the submission of our representations, the A420 has been identified as the most dangerous road in south-east England. There have been three fatalities in two recent accidents within 6 weeks of each other on the single-carriageway section of the A420 at Fyfield and Tubney. A report by Atkins, published late in the consultation on the Publication version of LPP2, shows that the A420 and the A415 are already at full capacity, and our own calculations indicate that the A420 at Fyfield would be operating at 140% of nominal capacity by 2026 and that traffic on the A415 towards Marcham and Abingdon will have increased by 50% in the event of all committed and proposed developments in Kingston Bagpuize and Southmoor coming to fruition. (See our separate supplementary submission on paras 2.45 and 2.46 of LPP2).

1.5 Better alternatives

We note that:

- A. a site west of Wantage promoted by Dandara (ID 758199) is of comparable size to FLEKB, and is close to the sustainable market town of Wantage (complying with the spatial strategy and the settlement hierarchy). The infrastructure contributions associated with this site are of benefit to the wider area, rather than simply mitigating the requirements generated by the site itself. The site lies only a mile south of the boundary of the Abingdon and Oxford Fringe sub-area and is better placed to meet the housing requirements of the Vale District as a whole.
- B. LPP2 as published assumes that Dalton Barracks would be available for development in 2029 and that Phase 1 (1200 houses) would be available in the plan period. The date at which construction can start has now been brought forward to 2025 without any increase in assumed availability. A relatively modest increase in construction rates at Dalton barracks would easily absorb any shortfall left by removing FLEKB from the allocations. Furthermore, Carter Jonas, the site agent (ID 1144998), repeatedly uses the words 'at least 1200' in discussing construction by 2031.

1.6 Adverse impacts on Fyfield and Tubney

We have consistently made the point (see section 1.6 of the representation) that the major impacts of the development would fall on the community of Fyfield and Tubney, for two main reasons:

(1) the extra traffic on the A420 (see separate submission) will result in extra congestion, noise, air pollution and add to safety concerns.

(2) The proposed new roundabout on the A420 to service the proposed access road on the development (without which it would not be viable) will cause substantial additional light, air and noise pollution in Fyfield village and its conservation area.

Efforts to get these points acknowledged have failed. The summary of representations gives no indication that they have been noticed, let alone understood. Nor is there any sign in the exchanges between Savills and the DC over the scope of the Environmental Statement now under preparation that the impacts of the roundabout will be taken fully into account. The same holds true for the annexes to the representation submitted to the consultation by Savills, where the environmental studies appear to focus only on impacts within the site itself. **No studies of the impact on Fyfield and Tubney have been commissioned.**

1.7 Conclusion

The new information outlined above supports the contention that building 700 houses on FLEKB would be a distortion of national planning policy and of the DC's own spatial strategy and settlement hierarchy. In particular, the reasons (remoteness and lack of transport infrastructure) for not including the site as one of those close to and accessible to Oxford apply with equal force to other employment centres. It will not therefore make a useful contribution to the housing requirement. Meeting the sub-area's theoretical target should give way to commonsense and good planning principles. Alternatives are available and should be preferred

2. Unsound, selective and biased evidence base

Section 2.1 and Appendix A of our representation drew attention to a large number of omissions and misrepresentations about Site KBAG_A, Fyfield land east of Kingston Bagpuize, in Topic Paper 2: Site Selection Appendix B and in the Landscape Capacity Study, which suggest that the DC planning officers and their consultants have set out to justify the site as a preferred candidate rather than to evaluate it dispassionately (Dandara Ltd has independently cited the Fyfield site as an example of a site being unfairly favoured for development).

A more objective assessment of the cumulative significant planning and environmental adverse effects of this proposed development should have led the District Council to reject it as a housing allocation. This cumulative effect would result from the following combination of adverse impacts (red and orange) – transport; landscape; flooding; ecology; historic environment; access; water and waste-water; public services and environmental health / air and noise pollution.

Comments made in the earlier consultation on LPP2 were apparently ignored; and in its summary of representations the DC wholly failed to refute – or even address – the numerous criticisms made by Fyfield & Tubney Parish Council and its residents. Instead they relied on a claim to have followed due process in accordance with national guidance.

It is not the process but its misapplication that is of concern. Substantive comments have not been properly addressed. The testing of the plan against reasonable alternatives is flawed and we request the Inspector to conclude that the site selection process is invalidated by the lack of balance and impartiality in the evidence base.

Matter 4: Abingdon and Oxford Fringe Sub Area
Question 4.1 (c) East of Kingston Bagpuize with Southmoor
(in Fyfield & Tubney Parish)

Are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements — both general and site specific — justified, consistent with national policy and would they be effective?



The Fyfield Elm

Submission No. 3 by
Fyfield and Tubney Parish Council
and the Fyfield Land Action Group (FLAG)

In Support of Representation ID: **730255** (Dr Stephen Fraser)

Fyfield & Tubney Parish Council and FLAG wish to be represented at the Public Examination scheduled for 24th July 2018 pm by:

Professor John Cobb (ID 1095954) and
Mr John Bradley (ID 1095527)

The impact of traffic associated with the proposed construction of 600 homes on Fyfield Land East of Kingston Bagpuize (FLEKB)

This submission is intended to be read in conjunction with the representation submitted by Fyfield and Tubney Parish Council in response to the publication version of the VoWH LPP2 together with the attached Appendix (FLAG Technical Note: *Cumulative Impact on Traffic Due to Committed and Proposed Housing Developments in the Fyfield and Kingston-Bagpuize Southmoor Area*).

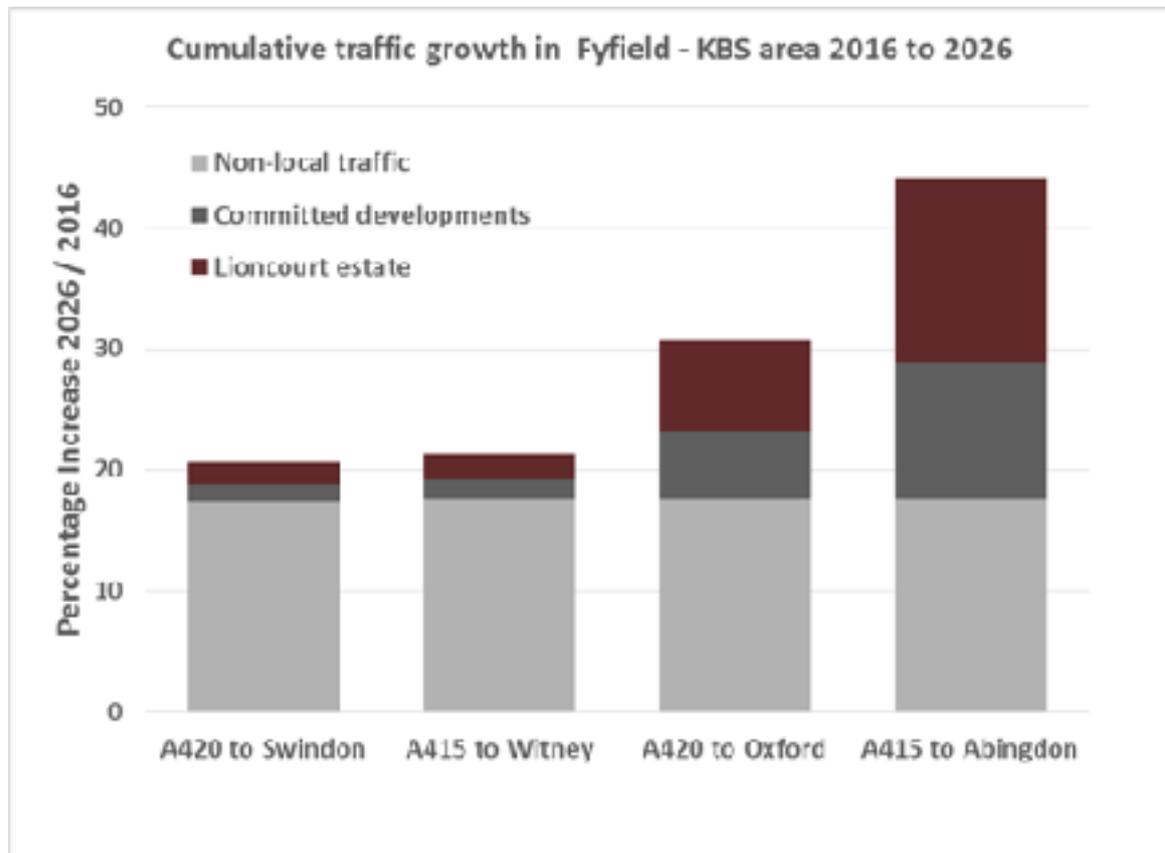
The responses of the District Council to our representation are unduly complacent and do not address our detailed comments. We wish to reassert our belief that the traffic associated with the construction of 600 (now 700) houses on Fyfield Land East of Kingston Bagpuize (FLEKB) will have a severe impact on the local highway network, which is already overloaded and will be made worse by developments that have already been approved.

As we stated in our representation, the results of the Evaluation of Transport Impacts presented in Topic Paper, TP05, are optimistic and misleading when compared with the results of the Atkins Evaluation of Transport Impacts, Stage 2 prepared for VoWHDC/Oxfordshire County Council [TRA06.3] and available in final form only on 5 October 2017. The results of this study indicate that many of the roads in the area will be at, or over, capacity and severely congested as a result of the allocations in LPP2. In particular the study reveals that much of the congestion in the vicinity of Frilford, Marcham and Abingdon would be directly attributable to the construction of 600 houses at FLEKB. The publication date of this later report by Atkins suggest that its results could not have been used properly to inform LPP2.

The Transport Assessment Scoping Note presented in the Savills/Lioncourt representation is unsatisfactory for a number of reasons. In particular, as submitted, it concentrates only on the impacts of traffic due to FLEKB and ignores the cumulative effect of other developments in the area. This cumulative effect seems also to have been ignored by OCC in their correspondence with Key Traffic Consultants/Lioncourt Strategic Land.

Since we submitted our representation, we have performed a straightforward, unbiased and objective assessment of the gross impact of traffic in the local area due to current and proposed developments in Fyfield and Kingston Bagpuize. It is based on minimal assumptions and publically available data, including Department for Transport traffic counts. It is attached as an Appendix to this submission.

The grosser effects of the developments on the highway network are demonstrated in the figure (from the note) below. This represents nothing more than common sense given the size of the developments and their location with respect to the main areas of employment.



The assessment shows, *inter alia*, that by 2026:

1. Traffic on the A420 at Fyfield will have increased by 30% and the peak hour demand would be greater than 140% of nominal capacity. As well as locally, this will have a major impact on downstream junctions such as the A420/A338 roundabout in Tubney Woods and the A420/A34 Botley interchange.
2. Traffic on the A415 towards Marcham and Abingdon will have increased by 50% which will cause severe congestion at the Frilford staggered traffic lights where the A415 crosses the A338.
3. Additional traffic on the dual carriageway section of the A420 at Fyfield due to the proposed re-routing of the A415 along the proposed link road would probably cause severe congestion at the proposed new roundabout at the northern end of the link road, and increased 'rat-running' along minor roads through Fyfield and Appleton and Eaton. We note that the Atkins (October 2017) report did not include the proposed link road.

4. Additional traffic through the Marcham AQMA would be equivalent to that due to the construction of approximately 530 houses in Marcham. 300 of these 'equivalent houses' would be due to the development at FLEKB. We observe that, following the consultation stage of LPP2, a total of 430 proposed houses were withdrawn from LPP2 on grounds of air quality. We note that these were on the eastern side of Marcham and that most of the traffic would not have passed through the village centre.

In February 2018 the A420 in Oxfordshire was identified in a survey commissioned by Registration Transfers Ltd as the most dangerous road in the South East (excluding greater London). Since then, there have been three fatalities in two separate accidents within six weeks on the single carriageway section at Fyfield and Tubney alone. Without substantial investment in infrastructure and re-routing away from populated areas this road will remain dangerous. Further housing development at FLEKB would only add to the danger.

Sample of Representations to LPP2 in support (this is not an exhaustive list):

Person ID	Full Name	Person ID	Full Name
1095180	Mr Mark Baker, CBE	1098023	Ms Janine Elton
1095527	Mr John Bradley	730263	Mr David Groves (KBS PC)
1095325	Mr Brian Buchan	1145347	Dr Dimitrios Hatzis
1094354	Mr Keith Budgen, CBE	1142741	Mr Philip Hatzis
1095954	Prof. John Cobb	874560	Ms Helen Marshall (CPRE)
1098086	Mrs Shirley Collins	1142522	Mr Michael Pearce (Longworth PC)
730184	OCC Cllr Yvonne Constance	1095962	Mr Graham Varney
1144305	Mrs Winifred Cox	828535	Mr John Watts
1095676	Mrs Rebecca Dougall	1144426	Mr Alan Woodward

See VoWH DC Local Plan 2031 Part 2 Consultation Statement Appendix 3: Summary of Representations — particularly pages 208-211; and 215-237.

Endorsement for the Submission

The following neighbouring Parish Councils and local County and District Councillors have endorsed this submission:

Oxfordshire County Councillors

Ms Yvonne Constance Shrivensham, Cabinet Member for Transport
 Ms Anda Fitzgerald-O'Connor Kingston & Cumnor (inc. Fyfield & Tubney)
 Ms Judith Heathcoat Faringdon, Deputy Leader of OCC

District Councillors

Mr Eric Batts Kingston Bagpuize Ward
 Ms Yvonne Constance Ridgeway Ward
 Mr Anthony Hayward Thames Ward (inc. Fyfield & Tubney)

Parish Councils

Appleton & Eaton	Chair: Mark Richards	Clerk: Susan Blomerus
Ashbury	Chair: Kate Watkins	Clerk: Claire Arnold
Frilford	Chair: Shaun Forrestal	Clerk: Christine Antoun
Hinton Waldrist	Chair: Hugh Hamill	Clerk: Allison Leigh
Kingston Bagpuize & Southmoor	Chair: Brian Forster	Clerk: Sarah Bates
Longworth	Chair: Sandra Sabathy	Clerk: Gillian Carlisle

Matter 4
Question 4.1 (c)

**The impact of traffic associated with the proposed construction of 600 homes on Fyfield Land East
of Kingston Bagpuize**

J. H. Cobb
30 May 2018

The cumulative impact on traffic due to
committed and proposed housing
developments in the Fyfield and Kingston
Bagpuize-Southmoor area

1 Introduction

Figure 1 shows a diagram of the road network in the Fyfield-Kingston Bagpuize area. The purpose of this study is to assess the cumulative impact of additional traffic from housing developments in the area up to 2026 when the last proposed development would be completed. The conclusions are presented in Section 4 on page 9.

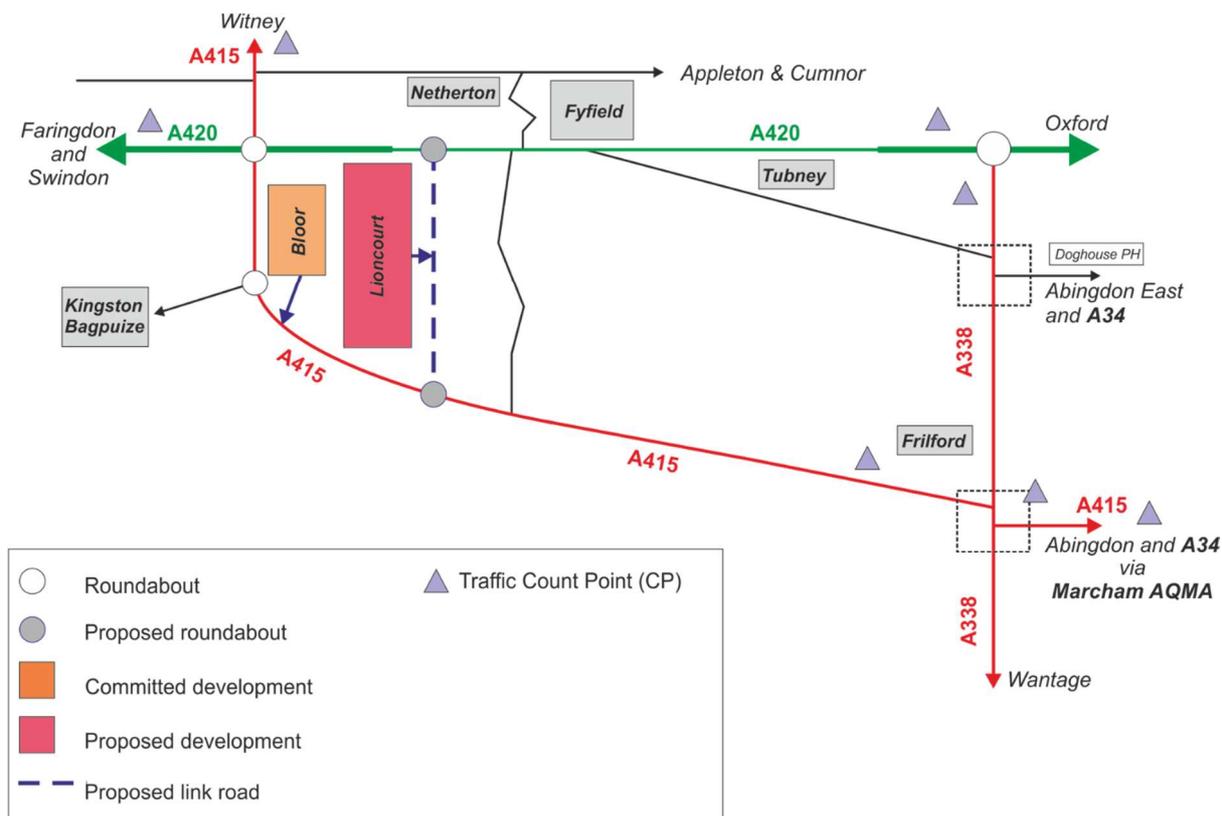


Figure 1 Highway network in the region of Kingston Bagpuize, Fyfield and Tubney, and Frilford.

1.1 Committed developments in KBS

Since 2015 planning permission has been granted for over 500 new dwellings (Table 1) in Kingston Bagpuize-Southmoor (KBS). Not all of these are yet complete, in particular construction of the Bloor development of 280 houses has started only recently.

Table 1 Current and proposed developments in Kingston Bagpuize – Southmoor and Fyfield.

Development	Dwellings	
Bloor Homes	280	
David Wilson	73	
Fallowfields (part 1)	43	
Springfield Farm	25	
Fallowfields (part 2)	35	
Other	70	
Total committed	526	
Lioncourt	700	Plus 70 extra-care homes and SFE primary school
Total including Lioncourt	1226	

The several hundred houses being built in the Great Coxwell - Faringdon area will also feed traffic into the A420 corridor and the A415.

1.2 The Lioncourt development

The construction of a further 700 dwellings, 70 extra-care homes and a single form entry primary school on a 34 Ha site in Fyfield (FLEKB) on the eastern edge of Kingston Bagpuize (the 'Lioncourt development') is proposed. This development will feed traffic onto the A420 and the A415.

The proposed development would include a new link road between the A420 and the A415 with two new roundabouts. The northern new roundabout connecting the link road to the A420 would be on the single carriageway section of the A420 at Fyfield, shortly after the end of the dual carriageway KBS bypass. As discussed below, this section of the A420 is already operating over capacity during peak hours.

The link road would be the only access to the Lioncourt development. Discussions between OCC and the developers indicate that the existing A415 would be re-routed along the link road to reduce the traffic currently passing through Kingston Bagpuize; the old section of the A415 to the south of the new development would be downgraded and traffic-calming measures introduced on this section. Traffic to and from Faringdon/Swindon and Witney to Abingdon would therefore use the A420 east of the A420/A415 roundabout and the link road before re-joining the old A415 at the southern end of the link road.

If this development is approved, it would be completed by 2026.

1.3 Destinations

The principal destinations from the KBS-Fyfield area are all to the east; most commuter traffic would use the A420 eastbound and A415 south-eastbound in the morning, and the A420 westbound and the A415 north-eastbound during the evening peak hours.

The main areas of employment are Oxford, and Abingdon and 'Science Vale', including Milton Park and Harwell. Didcot Parkway provides a fast rail connection to London. Commuter traffic from the area would primarily use the A420 to Oxford and the A415 to Abingdon and 'Science Vale', and Didcot.

The closest major retail outlets are in Oxford and Abingdon. In particular, the closest large supermarket (Tesco) is in Abingdon, accessed from the A415.

Oxfordshire's principal hospital, the John Radcliffe Infirmary, is to the north-east of Oxford and would be accessed via the A420 or the A415 and A34.

1.4 Other current and potential traffic in the KBS-Fyfield area

The A420 and A415 in the area feed the major north-south route of the A34 with junctions at Botley and Abingdon respectively.

The Oxfordshire Freight Quality Partnership Lorry Route map¹ shows the A420 as an HGV route 'for local access only' and the recommended route for HGVs between Swindon and Oxford is via the M4 and A34. Many HGVs, however, use the A420 to save fuel and avoid delays on the A34. On average, 1400 to 1500 HGVs use the A420 daily at Fyfield and Tubney.

¹ Halcrow / Oxfordshire County Council, [6Lorrymap.pdf](#)

A Park and Ride for Oxford City is proposed for Cumnor (to the east of Fyfield). Whilst this might alleviate traffic in the vicinity of Oxford, it could well attract further traffic from western towns and villages onto the A420 passing through the Fyfield –KBS area.

As yet the route of the proposed Oxford-Cambridge expressway has not been decided. However, unless the most southerly route is selected, the Expressway would undoubtedly result in increased traffic on the A420 and / or the A415 in the Fyfield-KBS area.

1.5 Local congestion and rat-runs

The major roads in the KBS-Fyfield area are already heavily congested at peak hours, in particular at the A420/A415 roundabout in KBS and on the single carriageway section of the A420 at Fyfield and Tubney. A common rat-run for traffic from Witney on the A415 wishing to avoid delays at this junction is to use the minor Netherton-Appleton road, and Netherton Lane and Digging Lane in Fyfield to join the A420, or to continue towards Oxford via the minor road to Appleton and Eaton.

The most direct route to Abingdon/the A34 for traffic originating north or west of KBS, which avoids the A415/A338 traffic lights at Frilford, is to use the A420 and Abingdon Road at Tubney, via its intersection with the A338 at Frilford Heath, and Gozzards Ford. Long delays develop at peak hours at the 'Dog House dogleg' junction of minor roads with the A338 at Frilford Heath.

1.6 Marcham AQMA

All traffic on the A415 from Frilford to Abingdon or the A34 would pass through the Marcham Air Quality Management Area (AQMA). Plans to build 430 houses in Marcham were withdrawn following the consultation stage of VOWH LPP2 due to air quality concerns even though they were located on the eastern side of Marcham, with good access to the A34 and where most of the associated traffic would not have passed through the AQMA.

1.7 Safety

Even with the current level of traffic it is dangerous to cross the A420 at Fyfield or Tubney on foot, by bicycle or by horse outside peak hours, and impossible to cross during peak hours.

During peak hours the volume of traffic is such that it is not possible to turn right out of Digging Lane (the access road into Fyfield) onto the A420 to go west towards KBS; residents are forced to detour via Netherton and the A415. It is also dangerous to turn right into Fyfield from the A420 at peak hours.

The A420 was recently reported to be the most dangerous road in the South East². Two fatal accidents have occurred in the past (as of May 2018) two months, with three fatalities.

² <https://www.regtransfers.co.uk/info/most-dangerous-roads-britain>

2 Current situation and expected traffic growth

2.1 DfT Traffic Data

Traffic counts are available from the Department for Transport (DfT). These data consist of manual counts³, which give hourly traffic flows in each direction between 7 am and 7 pm, and Average Annual Daily Flows (AADF)⁴. Manual traffic counts are made only in some years, the latest being 2012 or 2013. AADFs are derived from the manual counts and estimated for the years when manual counts are not available. The latest year for which estimated AADFs are available is 2016. The percentage of HGVs was obtained from the DfT AADF data.

Table 2 shows the location of DfT traffic count points (CPs) on local main roads (also indicated on Figure 1), the AADF at each point for the year of the last manual count, and the estimated increase in traffic between 2012 (=100) and 2016. Over all seven CPs the average estimated increase is 2.22 percent per year but slightly more (2.64 percent per year) on the A420.

Table 2 Location and numbers of the DfT Count Points (CP) on local main roads. The AADF figures are for the year of the last manual count, all vehicles. The estimated growth is taken from the DfT AADF tables.

DfT CP Number	Road	Location	Last manual count	AADF 2012/3	Growth 2012 – 2016 (2012 = 100)	HGVs (percent)
27122	A420	West of A420/A415 jct Kingston Bagpuize	2012	15789	110.7	8.36
17052	A420	West of A420/A338 jct Tubney Woods	2012	17539	110.4	7.55
47111	A415	North of A420/A415 jct Kingston Hill	2012	9289	103.4	1.21
27106	A415	West of A415/A338 jct Frilford traffic lights	2013	10522	109.1	3.42
56748	A415	East of A415/A338 jct Marcham	2012	13152	102.7	2.80
38640	A338	Between traffic lights Frilford	2012	15603	110.8	2.73
16895	A338	South of A420/A338 jct Tubney Woods	2013	5693	115.0	3.95

2.2 Recent manual count on the A420

Traffic counts on the single carriageway section of the A420 at Fyfield were made by FLAG⁵ volunteers in October 2017. Table 3 shows a comparison of the FLAG counts with an extrapolation of the most recent DfT manual counts for the morning and evening peak hours. The last (2012) DfT peak hour manual counts have been multiplied by 1.132 (i.e. increased by 13.2 percent⁶) to obtain estimates of the peak hour traffic.

³ <https://data.gov.uk/dataset/gb-road-traffic-counts/resource/8d49272c-e525-495e-a60c-a93d62aedd6e> (400 MB file zipped to 40 MB)

⁴ <http://www.dft.gov.uk/traffic-counts/cp.php?la=Oxfordshire>

⁵ Fyfield Land Action Group

⁶ Five years at an average increase of 2.64 percent per year.

Table 3 Comparison of FLAG traffic counts on the A420 at Fyfield with extrapolated manual counts.

Time	Direction	Manual Count (2012)	Estimated(2017) Vehicles / hour	FLAG Counts Vehicles / hour	Difference
Morning Peak 7am – 8am	Eastbound	1294	1465	1585	120 (+ 8.2%)
Evening Peak 5pm – 6pm	Westbound	1077	1219	1372	153 (+12.6%)

The FLAG counts are 8 to 13 percent higher than the extrapolated DfT counts. The survey recorded 7.8 percent of HGVs, consistent with the 7.55 percent in the DfT data. The FLAG counts suggest that the morning peak traffic is shifted earlier than the earliest manual count period of 7am to 8am – understandable because commuters will leave earlier to avoid congestion on the A420.

Some of the difference between the FLAG counts and the extrapolated DfT counts may be attributable to traffic diverting along the Abingdon Road through Tubney – leaving the A420 in the morning and joining it in the evening – and some to a greater than estimated increase in traffic.

The capacity of the single carriageway section of the A420 at Fyfield and Tubney (see Section 8) is approximately 1270 vehicles per hour. It is clear that this section of the A420 is already operating at capacity during peak hours, amply confirmed by the queues which develop during the morning peak hours.

The FLAG survey data show that during the morning peak hours this section of the A420 is operating at 24 percent over capacity, and by 8 percent during the evening peak hours. The flow is over 1400 vehicles per hour for over two hours during the morning peak and the traffic has slowed to walking pace.

2.3 Anticipated growth of traffic

The population of Oxfordshire is expected to grow by 28% between 2016 and 2031, and that of the VOWH district by 37%⁷.

A global study of the transport impacts of the VOWH LPP2 was made by Atkins⁸ for OCC in 2017. It forecasts a growth of traffic in all districts of 36% between the base year of 2013 used in the study and 2031: a rate of 2 percent per year, a little less than the DfT estimates of 2.2 – 2.6 percent per year between 2012 and 2016 discussed above although more than the overall average rate of population increase of 1.87 percent per year.

With the assumption of a 2 percent growth per year, the overall ‘background’ traffic (i.e. from other developments and districts) on local roads would be expected to have increased by 28 percent (a factor of 1.28) between 2012 when the last manual counts were made, and 2026 when the developments in the KBS area are completed.

2.4 Public Transport

The Atkins report forecasts that the fraction of journeys made by public transport would drop from 11% in 2013 to 10% in 2031. Since the only practical public transport in the area is the 66 bus route

⁷ Oxfordshire County Council population forecasts, 2015 – 2040, August 2018.

<http://insight.oxfordshire.gov.uk/cms/occ-population-forecasts-2015-2040-updated-august-2017>

⁸ Atkins, Vale of White Horse District Council Local Plan 2031 Part 2, ‘Evaluation of Transport Impacts – Stage 2’, Oxfordshire County Council, 05 October 2017.

between Swindon and Oxford, and there is no practical public transport from Fyfield-KBS to the Abingdon/Science Vale area, even ten percent use of public transport is probably an overestimate.

3 Traffic estimates for 2026

Estimates of the traffic due to the growth of non-local traffic, and the committed and proposed developments, which should have been completed by 2026, have been made as described in Section 7.

Table 5 to Table 11 in Section 6 give estimates of traffic demand in 2026 at four points at the boundaries of the local area, the dual carriageway section of the A420 at Fyfield, and on the link road.

The four points at the boundary of the area are:

1. The A415 north of the A420/A415 roundabout at Kingston-Bagpuize (47111);
2. The A420 west of the A420/A338 roundabout in Tubney Woods (17052);
3. The A420 west of the A420/A415 roundabout at Kingston-Bagpuize (27122), and
4. The A415 west of the A415/A338 staggered traffic lights at Frilford (27106).

(The numbers in parentheses are the numbers of the corresponding DfT count points.)

4 Discussion

For clarity, most of the tables referred to in this section have been grouped together in Section 6.

4.1 Increase in traffic 2016 to 2026

1. Table 5 shows the estimated 'background traffic' flows where 'background traffic' means the traffic originating from outside the local area. The figures have been obtained by scaling the 2012 DfT manual peak hour counts by 1.28 to account for an average growth of 2 percent per year until 2026.
2. (Table 6) The committed new developments in KBS will introduce 2400 vehicles onto the local network in a twelve hour period and more than 250 vph during each peak period.
3. (Table 7) The proposed Lioncourt development would introduce a further 3200 vehicles in a twelve hour period and approximately 350 vph during peak periods.
4. Table 4 immediately below shows the estimated percentage increase in traffic from all sources between 2016 and 2026. For obvious reasons the most affected sections of the local network are the A415 at Frilford and the A420 on the east of Fyfield-KBS: because traffic from the developments would all be towards Oxford and the Abingdon area.
5. Figure 2 illustrates the contributions to the increase attributable to the growth of non-local ('background') traffic and the developments in the area. Approximately 60% of the additional demand due to developments would be attributable to the Lioncourt development at FLEKB.

Table 4 Fractional increase in traffic demand in the Fyfield – KBS area between 2016 and 2026

		Percentage increase of Total Traffic 2026 / 2016						
		Morning Peak			Evening Peak			Total 12 hours
				Total			Total	
Road / Destination	Direction							
A415 / Witney N of jct A420	North		23.5	20.3		19.1	20.4	21.4
	South	18.7			23.1			
A420 / Oxford at jct A338	East		29.2	29.0		31.3	30.2	30.7
	West	28.4			29.6			
A420 / Swindon W of jct A415	West		23.7	20.6		19.4	20.5	20.8
	East	18.9			21.9			
A415 /Abingdon at Frilford	South East		50.0	45.5		40.8	42.2	44.1
	North West	38.2			43.1			

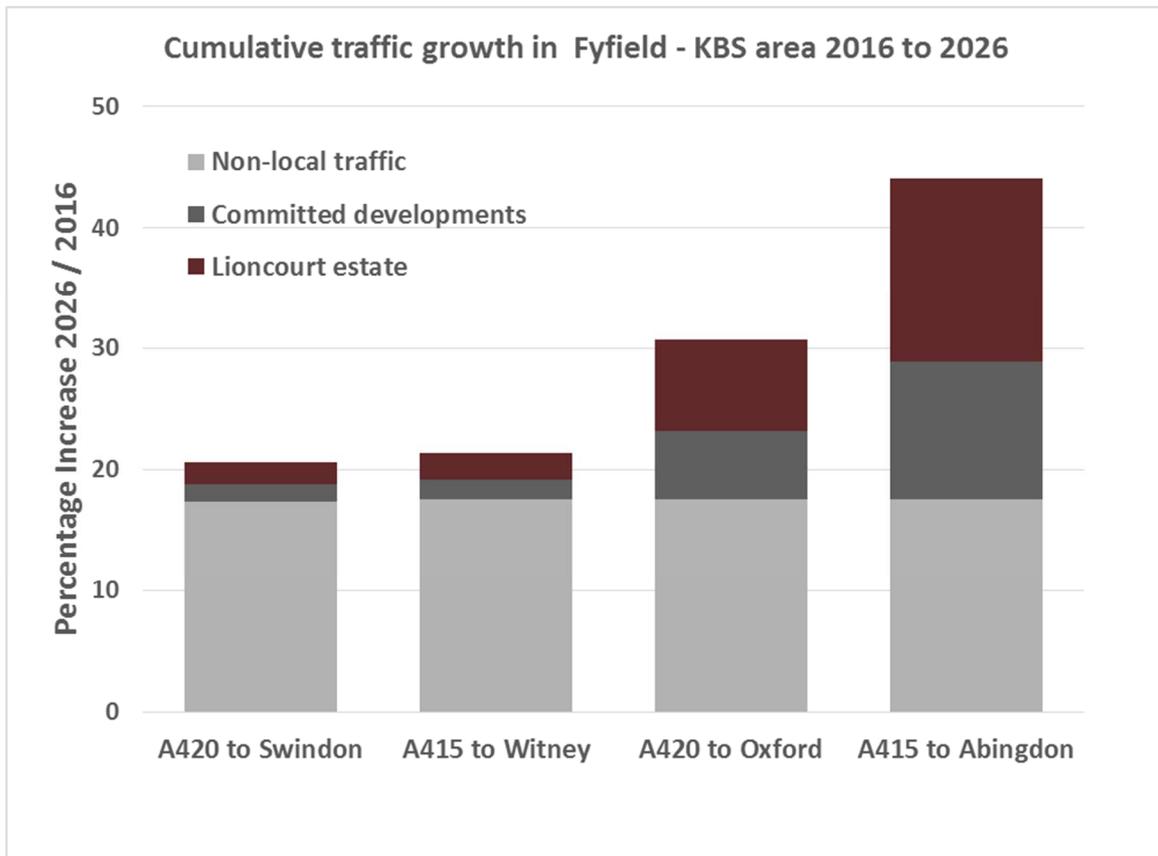


Figure 2 Percentage increase in total traffic on the main roads in the Fyfield – KBS area between 2016 and 2026, showing the contributions of the growth on non-local ('background') traffic and the committed and planned developments.

4.2 The effect on the A420

1. Table 5 shows that by 2026, even without any new developments in the KBS area, the demand on single-carriageway sections of the A420 – in particular the section at Fyfield and Tubney between the A415 and the A338 – would be well above its capacity (c. 1270 vph) during peak hours.

Note: The figures in Table 5 do **not** include the evidence from the FLAG manual count that the flow on the A420 at Fyfield is already 8 to 12 percent higher than DfT estimates, and that it is **already** over capacity during peak hours.

2. The demand on the single-carriageway sections of the A420 west of its junction with the A415 at KBS would also be above its capacity during evening peak hours.
3. Table 9 shows that the cumulative effect of growth in non-local traffic to 2026 plus that from the committed and proposed developments in KBS would be to increase the morning peak hour traffic demand on the eastbound single-carriageway section of the A420 at Fyfield between the A420/A415 and A420/A338 junctions to c. 1800 vehicles per hour.
6. The demand on the A420 at Fyfield would therefore be 43 percent above its capacity during the morning peak hours and at least 20 percent over capacity during the evening peak hours. There are only two ways in which this excess demand could be accommodated:

- a. The duration of the morning and evening peaks would increase to accommodate the additional volume of traffic at a flow limited by the capacity of this section. The morning peak would therefore extend from approximately two hours to three hours.
- b. Drivers would seek alternative routes via minor roads to avoid the consequent delays.

The only effective (for drivers) alternative route (involving left turns only) to absorb the excess demand would be for the morning traffic southbound on the A415 from Witney to Oxford or Abingdon to divert ('rat-run') via the minor roads through Nethererton and Fyfield (for Abingdon) and Appleton and Eaton (for Oxford).

There is no obvious alternative route, which does not involve right turns, for traffic returning in the evening.

7. The situation would be exacerbated by the proposal to divert the through traffic on the A415 via the proposed new link road (the access road to the Lioncourt estate) and its two associated roundabouts. This is discussed further below.
8. The link road would do nothing to alleviate potential rat-running on the Nethererton-Appleton Road discussed above.
9. There may be additional hazards associated with the traffic from the proposed retail and community centres on the north east corner of the estate and which would join the A420 just west of the northern roundabout.
10. The effects of the additional traffic on the A420, particularly during morning peak hours, would also propagate downstream and cause additional congestion at the A420/A338 roundabout in Tubney Woods.

4.3 The effect on the Marcham AQMA

1. (Table 8) The traffic from the committed and Lioncourt developments would result in c. 2500 additional vehicles per day using the A415 towards Abingdon.
2. Most of the additional vehicles would pass through the Marcham AQMA. The additional burden on air quality would be equivalent to the construction of approximately 530 houses in Marcham (of which 300 'equivalent houses' would be attributable to the Lioncourt development).
3. A total of 430 proposed houses in Marcham were withdrawn from LPP2 following the consultation stage due to air quality concerns even though they were located on the eastern side of Marcham, with good access to the A34, and most of the associated traffic would not have passed through the AQMA.

4.4 The effect on the A415 at Frilford Traffic Lights

1. (Table 9) The morning peak hour flow south east on the A415 at the Frilford traffic lights would increase to 916 vph, an increase of 50 percent compared with 2016 (c. 610 vph). A similar increase (43 percent) is expected for the evening peak.
2. The Frilford traffic lights are currently effectively at capacity. They are a notorious bottleneck with long queues developing in the eastbound direction in the morning and westbound direction in the evening⁹. Undoubtedly *severe* congestion would develop.
3. It is likely that drivers travelling to Abingdon or the A34 would detour via Abingdon Road through Tubney (a minor residential road) in an attempt to avoid congestion at the Frilford traffic lights, although there is already serious peak hour congestion at the Doghouse junction with the A338 at Frilford Heath.
4. Roughly 35 percent of the *increase* in traffic on the A415 at Frilford from 2016 to 2026 would be attributable to the Lioncourt development.

4.5 The effect of the link road on the A420 and Fyfield

1. The proposed link road between the A420 and the A415 would be the only access road to the Lioncourt development. New roundabouts are proposed connecting it to the A420 at the northern end and the A415 at the southern end. It is proposed to reroute and signpost the A415 via this link road, and to introduce traffic calming measures on the old section of the A415.
2. The northern roundabout where the link road joins the A420 would be at the point where the dual carriageway between the A415/A420 junction and Fyfield reverts to a single carriageway A road, a few hundred metres to the west of Digging Lane, which is the only direct access from Fyfield to the A420.
3. It is clear from the DfT traffic counts that at the A415/A420 roundabout the eastbound traffic on the A420 and the southbound traffic on the A415 all proceeds to Oxford and Abingdon. Assuming that the traffic calming measures are reasonably effective, the dual carriageway section of the A420 between the A415/A420 junction and Fyfield would then carry the traffic of both the A415 and the A420, and any Oxford-bound traffic from the committed developments in KBS. Estimates of the 2026 traffic on this section of dual carriageway are given in Table 10.
4. The peak flows of c. 2400 vph (am) and 2250 vph (pm) would be within the capacity of the dual carriageway, but queues would undoubtedly develop at the northern link-road roundabout, and further congestion on the Oxford (eastern) side as HGVs get up to speed on the single carriageway section.

⁹ A sign at the exit of Millets Garden Centre, on the A415 about one mile to the west of Frilford, advises customers wishing to travel to Oxford to go via KBS to avoid congestion at the traffic lights.

5. Congestion at the northern roundabout would undoubtedly encourage further rat-running by traffic from Witney to Oxford or east Abingdon via the Netherton-Appleton road and Netherton Lane-Digging Lane at Fyfield, and via Appleton. Netherton Lane in Fyfield is a particular concern; it is narrow with no pavement, winding and unlit.

4.6 Traffic on the link road

1. Because the proposed link road would also be a 'relief' road and signposted as the A415 it would carry most of the traffic from/to Swindon and Witney to/from Abingdon as well as the traffic from the Lioncourt estate. The estimated peak hour flows are given in Table 11.
2. The total peak hour flows on the link road would be of the order of 1700 vehicles per hour - approximately two seconds between vehicles: it would be impossible to cross on foot and probably difficult to turn right onto the link road/A415 from the development. There would be additional traffic turning into and out of the development from vehicles accessing the primary school.

4.7 The situation in 2031

The discussion in the preceding sections relates to the potential situation in 2026. At the end of the LPP2 period, 2031, there would be an (estimated) additional ten percent growth in non-local traffic in the area. Needless to say that this would further compound the demands on the local highway infrastructure.

5 Conclusion

All estimates are subject to uncertainties. However, the estimates presented above are robust. They rely on defensible assumptions and mainly common sense. In particular the estimates of total traffic are simply the sum of the assumed growth of the current levels of traffic (two percent per annum), the proposed number of additional dwellings in the local area and realistic assumptions about the location of employment opportunities relative to the Fyfield – KBS area. Finer details would require more sophisticated modelling (prey to the assumptions of any model used), but the overall conclusions presented above – that the additional traffic demands associated with the committed developments at KBS and the proposed development at FLEKB are inescapable: together with additional growth they will place an unsustainable burden on the local highway infrastructure.

6 Tables

The tables in this section give estimates for 2026 of traffic demand at four points at the boundaries of the local area. These points are:

1. The A415 north of the A420/A415 roundabout at Kingston-Bagpuize (47111);
2. The A420 west of the A420/A338 roundabout in Tubney Woods (17052);
3. The A420 west of the A420/A415 roundabout at Kingston-Bagpuize (27122), and
4. The A415 west of the A415/A338 staggered traffic lights at Frilford (27106).

(The numbers in parentheses are the numbers of the corresponding DfT count points.)

Table 5: Estimated 'background traffic' flows where 'background traffic' means the traffic originating from outside the local area.

Table 6: Additional traffic from committed developments (526 houses) in KBS alone.

Table 7: Additional traffic from the Lioncourt estate alone.

Table 8: Expected additional traffic from the committed developments in KBS and the Lioncourt development (but not including the 70 extra-car homes or the primary school).

Table 9: Total traffic in the KBS – Fyfield area in 2026.

Table 10: Peak hour traffic on the dual carriageway section of the A420 at Fyfield.

Table 11: Estimated traffic on the link road.

The figures in the tables should be interpreted as the *demand* on a particular section of road, all else being equal. If the demand is significantly greater than the capacity of the section, the flow will be restricted to its capacity. This is indicated by red shading.

Table 5 Estimated 'background' traffic demand in 2026; vehicles per hour.

		2026 Estimated 'Background' Traffic						
		Morning Peak			Evening Peak			Total
Road / Destination	Direction			Total			Total	12 hours
A415 / Witney N of jct A420	North		526	1553		1020	1500	10505
	South	1027			480			
A420 / Oxford at jct A338	East		1656	2349		698	2076	18748
	West	692			1379			
A420 / Swindon W of jct A415	West		717	2030		1171	2045	17466
	East	1313			874			
A415 / Abingdon at Frilford jct A338	South East		718	1160		500	1288	11255
	North West	442			787			
Total		3474	3617	7091	3520	3389	6909	57974

Table 6 Additional traffic demand in the KBS-Fyfield area due to committed developments in KBS.

		Committed Developments							
		Morning Peak			Evening Peak			Total	
		Arr	Dep	Total	Arr	Dep	Total	12 hours	
Road / Destination	Direction								
A415 / Witney N of jct A420	North		11	16		6	15	145	
	South	4			10				
A420 / Oxford at jct A338	East		70	98		35	96	902	
	West	27			61				
A420 / Swindon W of jct A415	West		16	22		8	22	205	
	East	6			14				
A415 / Abingdon at Frilford jct A338	South East		85	118		42	116	1090	
	North West	33			73				
Unclass. / KBS	West		6	8		3	8	72	
	East	2			5				
Total		74	188	262	162	94	256	2414	

Table 7 Additional traffic demand due to Lioncourt estate alone (not including any traffic associated with the primary school or the 70 extra-care homes).

		Lioncourt Development						
		Morning Peak			Evening Peak			Total
		Arr	Dep	Total	Arr	Dep	Total	12 hours
Road / Destination	Direction							
A415 / Witney N of jct A420	North		15	21		8	21	193
	South	6			13			
A420 / Oxford at jct A338	East		94	130		47	127	1200
	West	37			81			
A420 / Swindon W of jct A415	West		21	30		11	29	272
	East	8			18			
A415 / Abingdon at Frilford	South East		113	157		56	154	1451
	North West	44			98			
Unclass. / KBS	West		8	10		4	10	96
	East	3			6			
Total		98	251	349	216	125	341	3213

Table 8 Expected additional traffic demand from committed developments in KBS plus the proposed Lioncourt estate.

		Committed developments plus Lioncourt						
		Morning Peak			Evening Peak			Total
		Arr	Dep	Total	Arr	Dep	Total	12 hours
Road / Destination	Direction							
A415 / Witney N of jct A420	North		26	37		13	36	339
	South	10			23			
A420 / Oxford at jct A338	East		164	228		82	223	2102
	West	64			141			
A420 / Swindon W of jct A415	West		37	52		19	51	477
	East	15			32			
A415 / Abingdon at Frilford	South East		198	276		99	270	2541
	North West	77			171			
Unclass. / KBS	West		13	18		7	18	169
	East	5			11			
Total		172	439	610	378	219	597	5627

Table 9 Total traffic demand in the KBS-Fyfield area 2026

		Total Traffic 2026						
		Morning Peak			Evening Peak			Total
				Total			Total	12 hours
Road / Destination	Direction							
A415 / Witney N of jct A420	North		553	1589		1033	1536	10844
	South	1037			503			
A420 / Oxford at jct A338	East		1820	2577		779	2299	20850
	West	757			1520			
A420 / Swindon W of jct A415	West		754	2082		1190	2096	17942
	East	1328			906			
A415 / Abingdon at Frilford	S East		916	1435		599	1557	13796
	N West	519			958			
Unclass. / KBS	West		13			7	18	169
	East	5			11			
Total		3645	4056	7683	3898	3608	7506	63601

Table 10 Estimated traffic (vehicles/hour) on dual carriageway section of A420 from A415/A420 junction to Fyfield

Morning Peak		Evening Peak	
Direction on dual carriageway section of A420			
East	West	East	West
2410	1270	1389	2252

Table 11 Estimated average traffic (vehicles/hour) on A420-A415 link road

Morning Peak		Evening Peak	
Direction			
South	North	South	North
1109	613	564	1102
Total 1722		Total 1666	

7 Method of Estimation

The additional traffic on each of the major roads due to the committed and planned developments has been calculated as the product of *Trip rate x Number of dwellings x Fraction to destination*.

7.1 Trip rates

The trip rates used are given in Table 12 and were taken from the Key Traffic Consultants (KTC) Transport Assessment Scoping Note for the Lioncourt development¹⁰. These were obtained from the TRICS data base for developments on the edges of towns and may be an underestimate for relatively isolated developments; they assume 35 percent affordable housing. Similar trip rates can be found in traffic assessments published on the internet¹¹. The implied three figure precision is misleading; more realistically the trip rates are probably known to no better than ten or twenty percent and undoubtedly vary by day of the week and time of year.

The trip rates used are slightly higher than those assumed in the Atkins study for OCC.

Table 12 Trip rates.

Morning Peak			Evening Peak			12 hour total
Arrivals	Departures	Total	Arrivals	Departures	Total	
0.140	0.358	0.498	0.309	0.178	0.487	4.590

7.2 Traffic distribution

The distribution of destinations used is shown in Table 13. It is similar to that used in the KTC TASN¹⁰ although the fraction of traffic to KBS in that document of 13 percent is unrealistically high and would imply of the order of 130 jobs in KBS. The figure has been reduced to a more realistic 3 percent and the remaining trips distributed *pro rata*.

Table 13 Distribution of destinations

Destination	Fraction (percent)	Major Road
Abingdon	45.1	A415
Oxford	37.4	A420
Swindon	8.5	A420
Witney	6.0	A415
KBS	3.0	Minor road

7.3 Developments

Table 1 lists the committed and proposed developments in KBS and Fyfield. Traffic originating from the Lioncourt development would account for nearly 60 percent of the additional traffic from the new developments in the area.

¹⁰ Key Traffic Consultants Transport Assessment Scoping Note included in the Savills' representation to LPP2.

¹¹ For example, a study of a proposed housing development on the edge of Thame made by Glanville associates, 2011.

8 Capacities

8.1 Road capacities

Table 14 Fraction of HGVs and Capacity of local main roads

DfT CP Number	Road	Location	Fraction HGVs Percent	Capacity Vehicles / Hour
27122	A420	West of A420/A415 Kingston Bagpuize	8.36	1933 / lane
17052	A420	West of A420/A338 (Tubney Woods)	7.55	1949 / lane
	A420	Fyfield (single carriageway)	7.55	1267
47111	A415	North of A420/A415 (Kingston Hill)	1.21	1362
27106	A415	West of A415/A338 (Frilford/Millets Fm)	3.42	1329
56748	A415	East of A415/A338 (Marcham)	2.80	1338
38640	A338	Between traffic lights at Frilford	2.73	1339
16895	A338	South of A420/A338 (Tubney Woods)	3.95	1321

Table 14 shows the fraction of HGVs on local main roads and their capacity, the maximum hourly sustainable throughput per lane. The capacity, C , is calculated according to the formula appropriate to a rural main road¹²:

$$C = A - B * H$$

where H is the percentage of HGVs.

$$A = 1380 \quad B = 15 \text{ single carriageway}$$

$$A = 2100 \quad B = 20 \text{ dual carriageway}$$

¹² Design Manual for Roads and Bridges, Volume 5, Section 1, Part 3, page 17, The Highways Agency, 1997

9 Atkins Study

A global study of the transport impacts of VOWH LPP2 was commissioned from Atkins by OCC¹³ in 2017. It makes a number of forecasts.

9.1 Traffic Growth Rates

The report forecasts an overall growth of traffic of 36% between a base year of 2013 and 2031. This is somewhat less than the expected increase in population in VOWH of 39% between 2016 and 2031 but in line with the expected growth of the population of Oxfordshire of 27% between 2016 and 2031¹⁴.

9.2 Public Transport

The report forecasts that the fraction of journeys made by public transport would drop from 11% in 2013 to 10% in 2031.

9.3 Capacity impacts

Even in the 'Do Minimum' scenario studied – *which does not include the LPP2 developments* – the report forecasts that several stretches of highway and junctions in the Fyfield – KBS area would operate at capacity. In particular:

1. The A420 eastbound at Fyfield and Southmoor during morning peak traffic;
2. The A420 westbound at Tubney Wood, Fyfield and KBS during evening peak traffic, and
3. The westbound approach to the A415/A338 junction.

For the option (2) adopted by VOWH in LPP2 which includes the Lioncourt site the Atkins' model also predicts capacity limitations on:

1. The eastbound approach on the A415 at the A415/A338 junction during the evening peak hour, and
2. The eastbound approach on the A420 to the A420/Abingdon Road junction in Tubney.

The model also predicts significant 'rat-running' through minor roads, in particular Digging Lane between the A415 and the A420 at Fyfield¹⁵.

It is important to observe that the Atkins study did **not** include the Lioncourt link road, and assumed only 600 dwellings and its assessment of impacts in the immediate vicinity of Fyfield – KBS is likely to be incorrect.

¹³ Atkins, Vale of White Horse District Council Local Plan 2031 Part 2, 'Evaluation of Transport Impacts – Stage 2', Oxfordshire County Council, 05 October 2017.

¹⁴ Oxfordshire County Council population forecasts (March 2018).

¹⁵ The diagrams show that this very minor road would be at greater than 95% capacity.