

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing

(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Mr

Colin

Thomas

SPADE (Sunningwell Parishioners
Against Damage to the Environment)

6 Beaulieu Court

Sunningwell

Abingdon

OX13 6RQ

spade.sunningwell@btinternet.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

As per previous responses we regret we are unable to comply with the request for a separate sheet for each representation as our representations cross several interconnected subjects. However, we identify the relevant para or policy to assist you as far as possible. We hope this is of assistance.

Name or organisation:

3. To which part of the Local Plan does this representation relate?			
Paragraph	2.126	Policy	4a, 8a/b,12a &13a
		Policies Map	Mainly Fig 2.4

4. Do you consider the Local Plan is: <i>(Please tick as appropriate)</i>			
4. (1) Legally compliant	Yes	<input type="checkbox"/>	No <input type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No <input type="checkbox" value="UNSOUND"/>
4. (3) Complies with the Duty to Cooperate	Yes	<input type="checkbox"/>	No <input type="checkbox"/>

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

8a/b, 13a, 12a – all comments relate to the Dalton Barracks allocation and related matters.

Plan Numbers (4a and 8a/b)

SPADE has previously supported the Dalton Barracks site allocation as brownfield / previously developed land (PDL), subject to certain conditions. As a matter of principle SPADE continues to support PDL over non PDL development. However, this support was on the basis of a genuine need to meet a shortfall against the Objectively Assessed Need (OAN) / plan requirements, and potentially as an allocation to meet a proportion of the Oxford unmet need (if any).

The Vale fail to include in their plan the **total** of the numbers of the dwellings they are proposing. SPADE finds this approach disingenuous. To avoid including a total line in the Core Policy 4a table on page 26 of the plan document seems to be more than an oversight. The Vale Local Plan 2031 Part 2 now sets out that the Vale

proposes delivery of 24,748 dwellings, an oversupply of housing of 1,998, **above** the housing requirement for the full plan period (Apr 2011 to Mar 2031).

Historically, the Vale has never achieved its planned rate of housing delivery. To inflate the target over an already disputed SHMA/OAN figure will only compound the shortfall and demonstrate the plan is unsound. The excessive target will encourage developers to selectively choose sites that offer greatest profit and not meet the Vale's actual need both in dwelling size or location. Therefore we seek explicit wording in the appropriate policy to clarify that the 5 Year Housing Land Supply will only be based on the OAN and not the target figure including the oversupply.

The allocation at Dalton Barracks cannot be justified on the basis of meeting the housing requirement figures. We note that since the Local Plan Part 1 was examined the Growth Board have agreed a "working assumption" allocation of 2,200 dwellings in the Vale. Unfortunately in the intervening period, Oxford City have not progressed with quantification of their need nor their ability to meet it, evidenced by the draft Oxford Local Plan failing to define unmet need. This situation continues to make any accurate determination of Oxford's Unmet Need (if any were to exist) nothing more than a "guesstimate".

Even if one were to agree with the Oxfordshire Growth Board approach to determining need and its apportionment, the fact that one of the four District Councils concerned refused to agree to the outcomes of their process renders the whole approach meaningless. We therefore dispute the Vale's apparent acceptance that the Growth Board approach can be relied upon as part of the "duty to co-operate". We are unconvinced that this situation creates any obligation or duty on the Vale to meet Oxford's unmet need because it, in reality, remains unknown.

Even if one were to accept the apportionment outcome (and SPADE does not) the Local Plan Part 1 allocations in the Abingdon-on-Thames and Oxford Fringe Sub Area of 1,660 result in a shortfall to meet the Oxford unmet need allocation of only 540 dwellings. SPADE therefore contends that the full allocation of 1,200 at Dalton Barracks is grossly overstated.

Therefore the site is not "necessary" to meet the Housing requirement for the full plan period (Apr 2011 to Mar 2031) and, even if one were to accept the apportionment argument for meeting Oxford's unmet need, the plan allocates 660 dwellings in excess of that figure (2,200) in the Abingdon-on-Thames and Oxford Fringe Sub Area.

This gross overstatement of need is further challenged by the recent publication of the revised OAN formulae consultation which identifies previous overstatement of the Vale's and Oxford's need.

Therefore SPADE OBJECTS to the plan and seeks either the complete removal of the Dalton Barracks allocation or a substantial reduction in the numbers to 540 (1,200 – 660) and the complete removal of other smaller less sustainable sites including Marcham and Fyfield / Kingston Bagpuize from the Local Plan 2031 Part 2.

With that reduction in numbers we believe that the site could progress more quickly as it can commence before the site is vacated by the Ministry of Defence. More importantly it can avoid any potential of coalescence with Wootton, Whitecross or

Shippon. Finally, if the Vale were bring forward further allocations in later plan periods, this approach would give greater latitude to the required site-wide master planning process.

SPADE also notes and supports the submission on this subject by Dr Illingworth of the North Abingdon Local Plan Group which succinctly demonstrates the Vale's apparent fixation with gross oversupply of dwellings.

Transport links / Safeguarding 8a/b / 12a

SPADE supports the intention that Dalton Barracks travel sustainability for the 1,200 dwelling allocation being served by use of an improved 4/4B bus service which might be redirected through the site. Route 15 also runs along the southern edge of the site and similar enhancement and re-routing might also be considered to enhance connectivity. We also note that there is apparently no intention to progress dedicated linkage to the proposed but unfunded Park and Ride at Lodge Hill as part of this allocation.

We support this approach as we believe that the Park and Ride approach is less sustainable than use of service buses facilitating routing from point of journey origin to final destination. Interchanges inevitably cause delays and reduce patronage.

Any additional provision for the Dalton Barracks site via linkage to a Park and Ride is likely to cause detriment to the existing / enhanced 4/4B service making it commercially unviable and causing its loss to other communities along its route including Cumnor and Wotton.

Given the likely patronage levels the significant cost of providing a direct linkage route to a Park and Ride, and the ongoing revenue support required, is likely to be less effective than improving the existing service bus routes and creating new options including the desired linkage to the major employment sites in the Science Vale.

However, if, in the long term, linkage to a Park and Ride is justified by objective evidence, and therefore deemed essential, the Park and Ride would be better sited at the A34 / A415 (Marcham) Junction as an integral part of the site allocation and master planning process **i.e. build it where its presence creates the best sustainability outcomes for the greatest number of potential users.** There, where it still intercepts northbound A34 traffic, it can be a transport hub for South bound journeys to Milton Park and Harwell, East to Abingdon and North to Oxford. Central and North Abingdon are already well served by the premium X3 bus service so movement of the Park and Ride to Marcham is not detrimental overall.

SPADE believes that the SYSTRA report fails to be objective in assessing the true benefits of the A34/A415 junction and the potential for the BRT network to open up a wider range of Science Vale public transport options. In particular the report fails to examine in depth the potential for the A34/A415 junction location to become a BRT hub for new bus services for north / south journeys using the A34 which is intended to benefit from Highways Agency improvements and ultimately by the provision of the Oxford – Cambridge Expressway.

Vale also acknowledge that there is a need to connect the Dalton Barracks allocation to Culham, Milton Park and Harwell. Use of the Marcham junction site more effectively meets this need and has the added benefit of creating a link from the site running past the major employment and shopping sites in South Abingdon which the current 4/4B routing does not provide for. Rerouting a proportion of the enhanced 4/4B buses via a transport interchange at the A34/A415 junction meets this need and can connect to new services destined for Culham, Milton Park and Harwell. Equally Route 15 (Witney – Abingdon) would serve this location and facilitate east / west travel on a route other than via Oxford. If this were to connect with north / south Science Vale routes at a Marcham junction hub a significant benefit for non-Oxford centric travel becomes available.

This should be contrasted to the potential effect of a Park and Ride being located at Lodge Hill which can be expected to damage the viability of the X2, 3, &13 services (users from Abingdon may drive to the Park and Ride rather than walk to a local “X” bus stop and ride). It would also threaten the commercial viability of the 4/4B service routing via the Wootton road, even though this is by far the most effective way to create a sustainable housing site.

SPADE contends that the original examination of both the Lodge Hill and Marcham junction sites by the OCC as part of LTP4 show that there was very little to differentiate between them. Table 10 of the STSTRA report shows that if the Marcham Road Junction were chosen it requires no more buses on the route than Lodge Hill (when compared to the current Redbridge site).

We also dispute the summary of “Potential Issues” shown in Table 11 of the SYSTRA report. Specifically the phrase “Significantly reduced area of Abingdon potentially served by P&R without bus stops/ additional hubs” fails to recognise that the majority of central and north Abingdon already make use of the excellent X2, X3, X13 and 35 services. Residents in this area have no need for and will not benefit from a Park and Ride at Lodge Hill. Arguments concerning the provision of BRT 3 at Lodge Hill are irrelevant as these services all use the current Redbridge Park and Ride site as a hub (as intended by BRT 3) and the X13 service routes to the eastern arc of Oxford in exactly the same manner that BRT 3 is intended to. We propose that by focussing a transport hub at the Marcham Junction, with a re-routed 4/4B service using the A415 an **increased** area of Abingdon is served.

Para 5.6.5 of the report states ‘The Marcham site could help to alleviate issues of congestion along the A34 corridor; however, potential users that travel via the A34 would be forced to deviate away from their desire line towards Oxford...’ SPADE disputes that locating a Park and Ride at the A34/A415 junction is any more disruptive of the so called “desire line” than one at Lodge Hill.

We are also unconvinced of the apparent use of unusual metrics in the report which may have been chosen to flatter the Vale’s preordained preferred outcome. These include a 640m buffer distance for footfall to bus stops and the apparent baffling use of ‘network journey times taken from **google traffic on a Friday during peak hours**’. This reveals a potential lack of rigorous analysis in assessing issues objectively.

SPADE notes the comment that the proposed busway between Dalton Barracks and Lodge Hill (B2) could face 'challenges in terms of deliverability' (SYSTRA report para 0.8.4). It would be completely inappropriate to progress the Dalton Barracks site allocation on the expectation of linking it to a Park and Ride which may never exist, rather than providing effective public transport as an integral part of the development master planning. Otherwise, this could result in a situation where potentially 4,000 dwellings might be provided without comprehensive on site public transport provision. **Developing a "Garden Village" 2 miles distant from a transport hub when that transport hub could be co-located on the same site is short-sighted in the extreme.**

The Infrastructure delivery plan fails to identify the precise costs of providing busway B2. From the partial information provided it is likely to be many millions of pounds. SPADE contends that use of this money would be better invested in the creation and operation of an on-site integrated transport hub at Dalton Barracks, commensurate with its claimed "Garden Village" status.

Inset into the Green Belt 13a

The inset into the Greenbelt at Dalton Barracks is legally non-compliant. There are no justified "exceptional circumstances" for removal. The Vale explanation of "sudden availability" is not a valid argument and the fact is that the allocation could easily be fitted into the true PDL (i.e. the current built footprint of the site). In LPP1 the Vale made an argument on housing need / numbers for the removal of Green Belt status for a number of sites. We noted, with some surprise that the Inspector agreed with this assertion. **However, this is not the claim within Local Plan Part 2. If it were, the goal of almost 2,000 dwellings above the housing requirement for the full plan period (Apr 2011 to Mar 2031) render the numbers argument ineligible.**

SPADE acknowledges that airfields, as land that has been previously developed, are regarded as "brownfield land." However, we point out that a central premise of the policy has been, and remains, that it should not be assumed that the whole of the curtilage of a brownfield site should be developed. The glossary to the National Planning Policy Framework (NPPF) defines previously developed land as 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.'

NPPF Par 89 states "A local planning authority should regard the construction of new buildings as inappropriate in Green Belt". Exceptions to this include :-

'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), **which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.**'

Examining the current layout of Dalton Barracks it is easily possible to accommodate the allocation within the current built area of the site. There is no necessity to

release any part of the greenbelt to accommodate this allocation. The runways which could be claimed to be the “fixed surface infrastructure” would not need to be developed in this scenario as it would have a “greater impact on the openness of the Green Belt.”

Having rendered the previous LPP1 justification for “exceptional circumstances” to release Green Belt meaningless by over identifying sites by 2,000 dwellings the LPP2 sets out various highly spurious claims regarding the “exceptional circumstances” (para 2.75). None of these merit any serious consideration and are evidence of how desperate the Vale are to justify sanctioning the development of an inappropriate proportion of this site allocation. **Unexpected availability and conducting a Green Belt Study are not “exceptional circumstances.”**

Proximity to Oxford or the fact that it is PDL are again not in their own right “exceptional circumstances”.

SPADE therefore concludes that that there are no justifiable reasons for the site to be taken out of the Green Belt and seeks its retention as Green Belt within LPP2.

Even if an inset were to be permitted by the Inspector, there is absolutely no need to remove such a large area of Green Belt. It is acknowledged that NPPF para 85 states. “When defining boundaries, local planning authorities should ‘satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.’ However, we note that Para 91 of the LPP1 Inspector’s report, quoted in the LPP2 para 2.67 says ‘The Part 1 plan also proposed the release of other parcels of land from the Oxford Green Belt, as it was considered they may be required to contribute to addressing unmet housing needs for Oxford’. However, modifications to the plan deleted these further proposed changes to the Green Belt. The Planning Inspector’s Final Report into the Examination of the Part 1 plan made it clear that it is not ideal for a local plan to include alterations to Green Belt boundaries and indicate that further alterations may be necessary (i.e. to address unmet need for Oxford), **but that this approach was preferable to deleting land from the Green Belt when it was unclear if the released land would be needed for future development**’. The Planning Inspector’s Report stated that **‘Retaining these parcels of land in the Green Belt now would not prevent their deletion from Green Belt through the ‘Part 2’ plan or any other local plan or local plan review, if the necessary exceptional circumstances were to be demonstrated**’.

SPADE therefore opposes the creation of the inset into the Green Belt as the allocation could be built within the built form of the PDL and there is no requirement, in fact the complete opposite, of any need to “future proof” the plan as set out by the Inspector’s LPP1 plan report. It is always possible via a Local Plan Review or subsequent plan to revisit the need for, appropriateness or size of an inset.

Safeguarding 8a / 12a / 13a

The Vale Plan “publicity period” consultation now shows further details of the bus and cycleway safeguarded land between Dalton Barracks and Lodge Hill. The Bus and Cycleways as proposed cause severe detriment to the Green belt. The road surfaces, fencing, lighting (and bus gates or equivalent necessary to prevent unauthorised use) are inappropriate and intrusive on a ridge feature designated as Green Belt. These features do not accord with Para 90 of the NPPF as they fail to “preserve the openness of the Green Belt” and “conflict with the purposes of including land in Green Belt”. **We do not believe that the proposals as shown ‘can demonstrate a requirement for a Green Belt location’ as other alternatives have not been examined objectively.**

The most recent study of the Green Belt, commissioned by the Vale from Hankinson Duckett Associates states that the land parcels concerned **‘have high landscape sensitivity and high visibility and neither is suitable for development in landscape and visual terms’**. The report goes on to state that both have **‘a high contribution to at least one of the Green Belt Purposes. None of the Parcels are suitable for development in landscape and visual terms and development within any of these Parcels would harm the openness and integrity of the Green Belt’**.

We propose that the safeguarding of the Dalton Barracks – Lodge Hill link (B2) is unnecessary due to the existing planning controls due to Green Belt status of the land concerned. Any development proposal in this location already has to meet the highest test of ‘very special circumstances’ which the Vale as planning authority can already control. A local plan review could still consider the need for the infrastructure if it were not safeguarded and would be able to do so in the context where there would be greater certainty about the Oxfordshire County Council (OCC) Local Transport Plan proposals. Consequently there is absolutely no “necessity” to safeguard it at his time.

Whilst SPADE is fully supportive of evidenced based sustainable transport provisions, particularly those that encourage alternative access such as walking and cycling, the safeguarding proposals as shown on the plan for both the Park and Ride and associated public transport links as shown are premature, ill-conceived and illogical due to:-

- a. Uncertainty of future development of the Dalton Barracks site beyond 2031 (the linkage to the Lodge Hill Park and Ride is only an “if necessary,” subject to further allocations as identified in the Site Development Template for Dalton Barracks [Appendix A] p15 which states “To investigate in partnership with the Vale of White Horse District Council and Oxfordshire County Council, and provide if necessary a direct bus and cycle connection to the proposed Lodge Hill Transports interchange before higher growth beyond 2031 can be accommodated
- b. Uncertainty regarding the continued operation of both Seacourt and Redbridge PARK AND RIDE sites as they are in the Ownership of Oxford City Council and there is no agreement in place to close them (indeed Seacourt in in the process of being extended by the Oxford City Council). Continued operation of these

sites would make the OCC LTP remote Park and Ride sites commercially unviable

- c. Uncertainty of the long term appropriateness of the OCC Local Transport Plan which proposes the “remote Park and Ride Strategy,” including Lodge Hill due to the potential impacts of the Oxford – Cambridge Expressway proposals (if a south of Oxford expressway is created, with the intention and effect of freeing up the ring road the current Park and Rides may continue to be viable and the outer Park and Rides may not be necessary or viable)
- d. Inconsistent approach to safeguarding – the Site Development Template [Appendix A] p15 states that ‘Access to the A34 should be investigated along with cycle/ pedestrian access to proposed Park and Ride sites at Lodge Hill and Cumnor. Critically though the linkage to the A34 is not safeguarded. This is clearly inconsistent. **How can it be credible to safeguard arguably unnecessary routes to a non-existent Park and Ride site but not safeguard the only potential route from the development to the closest and most viable junction on the A34?**
- e. Even if the above issues were addressed the:-
 - i. absence of funding for the proposed A34 bus lane
 - ii. absence of funding for the cycleway/bus lanes in Sunningwell Parish
 - iii. absence of funding for the Lodge Hill Park and Ride, and
 - iv. uncertainty of the commercial viability of the Dalton Barracks to Lodge Hill route

demonstrate the level of speculation in bringing forward the proposal and the potential challenges before any early safeguarding proposal could be translated into physical infrastructure
- f. If the safeguarding as shown in the plan were retained SPADE further contends that Fig 2.4 and Safeguarding map p32 of the Appendices demonstrate very poor route choices with the routes to the site being incomplete (no linkage into the site allocation), lack of safeguarding for junction improvements on the Wootton Road facilitating bus turning and parts of the route being safeguarded unnecessarily
- g. Complete failure to engage with landowners, Parish Councils and the local community
- h. Apparent failure to examine viable alternative options which could include:-
 - i. further enhancements to the existing service bus 4/4B provision including partial rerouting to create linkage into Abingdon via the retail and employment areas in South Abingdon
 - ii. routing dedicated “hopper” buses by the existing road network allowing sustainable access to the Park and Ride for a larger population and potentially a linkage to Abingdon on the A415 allowing access to the retail and employment sites in South Abingdon

- iii. alternative safeguarding of routes that could provide segregated cycleway provision along the Wootton Road (an OCC aspiration for decades) and increased access by foot and cycle from the North Abingdon strategic site allocations via routing the bus and cycle lanes immediately west and alongside the A34 accessed by a new roundabout at the Long Tow / Wootton Road junction
- i. During the Vale public meeting on 6th Nov 2017 both Mr Maxted and Councillor Cox acknowledged that OCC Highways Officers were not consulted during the creation of the “Land Safeguarded for Lodge Hill Park and Ride, upgraded slips and bus/cycle link to Dalton Barracks” prior to its release in the public domain at the Vale Scrutiny meeting on the 20th September 2017. This has been confirmed during a meeting between SPADE, Sunningwell Parish Council and OCC Highways Officers on 6th November 2017. The details of the safeguarding, had been absent up to this point. We propose that the belated creation, rushed release and previous failure to involve OCC highways officers reveal a complete lack of professionalism by the Vale and demonstrate a failure of the duty to co-operate process. SPADE understands that OCC Highways are “underwhelmed” by the safeguarding as shown and question the proposed commercial viability of such an arrangement. This has been confirmed in face to face meetings between SPADE and OCC Officers and Members.
- j. Finally, SPADE have a fundamental concern that were bus and cycleways ever provided that it would lead to further urbanisation of the area and potentially be expanded to use by all vehicles. Within a Green Belt location it cannot be acceptable or appropriate to build new roads to a remote Park and Ride when there are other more sustainable options.

SPADE proposes in light of all the points above that the safeguarding of land in Sunningwell and Wootton Parishes for the Park and Ride and the bus and cycleways as shown in Figure 4.2 should be removed from the plan.

Oxford – Cambridge Expressway

Para 2.126 provides a very brief mention of the Oxford – Cambridge Expressway. The brevity of the text is staggering. The proposal is potentially the biggest strategic infrastructure project in the Vale’s area in our lifetime. The most recent National Infrastructure Commission (NIC) publication identifies four potential routes in the Vale all of which would have major ramifications for the Vale Local Plan 2031. Irrespective of the routing chosen the intention to seek 1,000,000 homes along a route of approximately 100 miles results in a colossal 10,000 dwellings per mile. Bearing in mind that Vale potential routes could be of 10 miles or more the expectation is that 100,000 homes need to be planned for up to 2050. This dwarfs the current housing need figures and clearly represents such a fundamental change to the nature of the mainly rural Vale that confining the text to such brevity is a major failure in the plan’s soundness. The NIC sets out the objective of commencing building by 2025 well before the end of the Plan period. Equally one of the potential route corridors, (corridor A) if chosen has the potential to make the current planning

intentions focussed on Lodge Hill irrelevant. Plans to build the South facing slips and the Park and Ride may be swept away when the same area will be required to build the necessary A34 / Expressway junction.

The Vale has previously expressed views on various Expressway routes (e.g. the Vale's "Didcot Garden Plan" published in June 2017) indicating access to significantly more information than published within LPP2. SPADE therefore contends that the Plan is unsound as it fails to examine the full implications of the Expressway proposals on the Vale area and the LPP2 proposals.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

8a

SPADE seeks either the complete removal of the Dalton Barracks site allocation or a substantial reduction in the numbers allocated to Dalton Barracks to 540 (1,200 – 660) and the complete removal of other smaller less sustainable sites including Marcham and Fyfield / Kingston Bagpuize from Local Plan 2031 Part 2.

SPADE proposes retaining Dalton Barracks in the Green Belt and restricting the allocation to the built form of the existing site.

We seek explicit wording in the appropriate policy to clarify that the 5 Year Housing Supply will be based on the OAN and not the target figure including the oversupply.

12a

SPADE seeks further reassessment of the location of any A34 South Corridor Park and Ride site. The subsequent allocation of a major site for up to 4,000 dwellings at Dalton Barracks and the soon to be identified route corridor for the Oxford to Cambridge Expressway require that the OCC Local Transport plan be re-examined to determine if the previous intentions are still fit for purpose. Critically SPADE seeks a more objective assessment of the A34/A415 junction location for a fully integrated on-site transport hub including a more creative examination of the BRT approach.

SPADE proposes that the safeguarding of land in Sunningwell / Wootton Parishes for the Park and Ride and the bus and cycleways as shown in Figure 4.2 should be removed from the plan.

13a

SPADE proposes retaining Dalton Barracks in the Green Belt and restricting the allocation to the built form of the existing site (excluding runways).

Para 2.126

SPADE contends that the LPP2 is unsound as it fails to examine the full implications of the Oxford – Cambridge Expressway on the Vale area and the Plan's proposals. Bearing in mind that the Corridor choice (undemocratic and un-transparent as that choice process is) will be known by July 2018 (potentially even before the Vale LPP2 EIP) we seek a delay in the Plan process in connection with all developments along all of the current Corridor / Route options. We also seek the provision of more information detailing the full implications of the Expressway on the Plan and site allocations that must have already been made by the Vale to ensure the plan is sound. If this analysis is not available in the public domain as it has not been conducted, then the plan is unsound and again we seek delay until a full and proper analysis has been undertaken.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

YES

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

SPADE consider it absolutely necessary to participate in the EIP to ensure that Sunningwell Parishioners are fully represented due to the very contentious issues concerning Dalton Barracks. Particularly the proposed safeguarding of unspecified bus and cycleways over a very exposed part of Green Belt within the parish which is considered premature, unnecessary, ill-conceived and illogical.

We request to attend all sessions involving the Dalton Barracks site allocation, all transport / safeguarding and Green Belt policy sessions

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

YES

I would like to be added to the database to receive general planning updates

YES

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Sunningwell Parishioners Against Damage to the Environment (SPADE) is a longstanding campaigning group established for over 15 years. We work with Sunningwell Parish Council and other organisations to campaign on planning and development matters impacting the Parish and close environs. We have taken an active part in all levels of planning consultations over the last 15 years and confirm we seek to participate in the Vale LPP2 Examination in Public in due course.

We champion democratically accountable, plan led, sustainable, environmentally sound development, but only where an evidenced need has been identified and can be met without adversely affecting the environment and quality of life enjoyed by the residents of Sunningwell Parish and surrounding Parishes.

We seek to maximise the use of brownfield / previously developed land to provide affordable homes co-located with employment opportunities for local people with the objective of creating sustainable communities not reliant on out commuting.

As with all of our consultation responses, this response is the culmination of extensive research within the Parish. This included a very well-supported public meeting held in conjunction with the Parish Council. Local people were given objective information on the Vale Plan and their views sought. The response, set out in this submission, represents their consolidated views.

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk