

Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications

Page 3: Part A - contact details

Q1. Are you responding as an:

Business / Organisation

Page 4: Individual contact details

Q2. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:

No Response

Page 5: Agent contact details

Q3. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered. As you are acting on behalf of another organisation, you need to provide their details in the first box but your company name and contact details thereafter.

No Response

Page 6: Business / organisation contact details

Q4. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:

Business / Organisation name	St Helen Without Parish Council
Contact name	Anna Clarke, Clerk to St Helen Without PC
Address line 1	██████████
Address line 2	██████
Address line 3	-
Postal town	████████
Postcode	████████
Telephone number	██████████
Email address	████████████████████

Page 7: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

Schedule of Proposed Draft Main Modifications

Q5. Please provide your comments below:

St Helen's Without Parish Council. Response to LPP2 Main Modifications.

1. SHWPC has consistently engaged with the process of the development of both LPP1 and LPP2 both in terms of written responses to the consultations undertaken for both and giving oral evidence at the hearings conducted by Mr David Reed in respect of LPP2. This response is made on behalf of Shippon residents by SHWPC. You will be aware that we and Wootton Parish Council have jointly sponsored a Neighbourhood Plan covering the area administered by both Parish Councils. The Neighbourhood Plan Steering Group will be responding in their own right.

2. We were pleased to note the Inspector's decision, in his letter dated 30th October 2018 to the Vale, retaining the Sports Ground located in Cholswell Road in the Green Belt. He went on to say that he did not consider LPP2 to be 'sound' but 'soundness' could be achieved, inter alia, by restricting the development on Dalton Barracks and the Airfield to the originally proposed 1200 dwellings with only 'such land as necessary for this smaller development being released from the Green Belt'. This was taken by our residents and, indeed, the Vale to mean that Shippon itself would remain in the Green Belt. The Vale reinforced this view amongst residents by publishing a map in its response to the Inspector showing only the development site being removed from the Green Belt and leaving the village of Shippon in the Green Belt.

3. However, in his letter to the Vale dated 19th December 2019, the Inspector describes the old village of Shippon, together with Dalton Barracks and the proposed airfield development forming an 'integrated and continuous settlement' which would be 'inset to the Green Belt'. In response to requests for clarification from ourselves and our MP the Inspector has made it clear that his current views are without prejudice to this current round of consultations and that 'all representations received during this period will be carefully considered'.

4. We believe that LPP2 remains unsound in terms of Main Modifications 4 & 5 for the following reasons:

- NPPF states Green Belt boundaries 'should only be altered in exceptional circumstances'. We have previously argued that, as a 'Ministerial decision' has determined that the whole of sites previously used as airfields should be regarded as brownfield sites, there is plenty of land available for the 1200 dwelling development proposed in this planning period (up to 2031). It is important to note that our residents have always adopted the mature view that the airfield could offer an opportunity for development. Their only, clearly expressed view, has been that their village identity and its rural characteristics be preserved by retaining it in the Green Belt.

- In the settlement hierarchy established by LPP1, and in MM2 and MM3, Shippon is classified as a 'smaller village' where only 'limited infill' development is permitted. The proposals in MM5 by making Shippon 'inset' to the Green Belt and thus removing the 'limited infill only' protection offered by full Green Belt status are clearly at odds with LPP1. Furthermore, given the status of small village afforded to Shippon by LPP1 the proposed development of 1200 houses cannot be regarded as limited infill (the village currently comprises some 400 dwellings). Therefore to meet the requirements of NPPF for the removal of land from the Green Belt the airfield development must be considered a new development which, by definition must be separate.

- MM4, referencing LPP para 2.57 makes explicit reference to the new development on the airfield 'incorporating garden village principles'. A key fundamental garden village principle is that it should be a 'standalone' entity. It is difficult, therefore, to square the adherence to garden village principles with the proposals that the airfield development be, essentially an extension to the village of Shippon.

- MM4 states in para 2.62 'the historic centre of Shippon lies to the south of Dalton Barracks. It remains relatively intact and still survives as a historic village with a rural approach from the west along Barrow Road. Development on the southern part of the site should respect the historic character of Shippon and its rural approach'. MM5, referencing LPP2 para 2.74 states 'Shippon and the existing and proposed development at Dalton Barracks is inset to the Green Belt as it will form an integrated and continuous settlement albeit protecting as far as is possible the existing character of Shippon.....It is our view that MM4 and MM5 contradict each other and that the assurance given in MM4 is massively diluted by MM5, thus raising continuing issues about the soundness of LPP2 in its current, amended state. This reinforces our view that the only real protection for the village of Shippon would be for it to be

retained in the Green Belt.

• The notion that Shippon and the new development would comprise an 'integrated and continuous settlement' is something that has never been aired in all our consultations with the Vale. Indeed in our involvement in the 'Masterplanning' process established the need for a clear 'buffer' zone of green space between the new development and Shippon. We seek, therefore, clarification as to the planning need for 'an integrated and continuous settlement'. At present this is giving rise to much counter productive speculation amongst our residents that there is a 'hidden agenda' and the removal of Shippon from the green belt is to enable redevelopment of the village to facilitate the necessary infrastructure and access to the airfield development.

5. MM4 appears to refer the need for a 'comprehensive development framework' but this phrase has been replaced in MM5 by the term 'masterplanning'. We are confused by this and seek clarification on the use of differing terminology between MM4 and 5. Are these two separate approaches? We have received repeated assurances from the Vale that our concerns would be addressed through a 'masterplanning' process however our experience of this in the preparation of LPP2 showed that we were a minority compared with representatives of the developers, the Vale and the County Council – an experience which has shaken our faith in the views of the local community being given any credence. .

6. We believe it perfectly possible to accommodate the development planned during the life of LPP2 whilst meeting the clearly identified wishes of our current residents to protect the existing village of Shippon. On the plan of the revised site boundaries, the area allocated for development covers some 47ha. At a density of 30 dwellings per hectare (typical for such a garden village development), this allocation could deliver 1,422 dwellings. A strategic buffer separating Shippon from the new development has been suggested in the Wootton and St Helen Without Neighbourhood Plan of some 15ha (ie leaving some 32ha for development). Therefore, to have the proposed buffer and deliver the 1200 dwellings could be easily achieved by a small increase to the development area or to the strategic site itself. We offer this as a simple way to satisfy both the objectives of LPP2 and the strong wishes of the local community as clearly expressed in the WSHWNP.

7. There simply is no reason why local residents, especially those in Shippon, should be denied or refused the separation they demand when it can be delivered alongside and in conjunction with the strategic objectives of LPP2. This would require only simple changes to draft main modifications MM4 and MM5. We urge the Inspector to consider this when making his final decisions.

Q6. Please upload any supporting documents below:

No Response

Q7. Would you like to comment on another Main Modification?

Yes

Page 9: Part B - your comments

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Additional Transport Evidence

Q8. Please provide your comments below:

St Helen Without Parish Council

Comments on Local Plan Part 2 Transport Delivery Report (Glanville) TR8171218/BE/DW/028

We detail below our comments on the LPP2 Part 2 Transport Delivery Report. Each comment is prefaced by the appropriate paragraph number in that report. Our overall view is that the data discrepancies and inconsistencies identified below in this report do not meet the standards set by the Inspector. On this basis it is our contention that LPP2 must remain unsound as the Inspector's request for transport evidence has not been met because the Glanville report is flawed.

As a consequence of the discrepancies and inconsistencies in the Transport Delivery Report, the SLR Additional Air Quality Report is also cast into doubt as its analysis depends on the accuracy of the 'Glanville' Transport Evidence Report.

2.1 The Glanville report appears to contradict the previous DIO report (DALTON BARRACKS - TRANSPORT DELIVERY DOCUMENT - November 2017 Carter Jonas - Paul Basham Associates Ltd) as it is based on vehicular access via Faringdon Road East. The Paul Basham Associates report identified the main exit as Sycamore Close on to Cholswell Road with Faringdon Rd East providing a footpath and cycle path in to the development through one of the green corridors. this appears to be a much better option as it separates pedestrians and cyclists from vehicles.

4.7 Only one new primary school was planned for the new settlement in the original LPP2 submission. However, the draft Main Modifications MM4 states that for the new development this would include "education provision"(i.e. no longer any reference to a new school). It is likely that any education provision will only be provided once a significant number of dwellings have been occupied. Commuting parents will, therefore, need to drive into Abingdon to take children to primary and secondary school or nursery before onward travel. Therefore, the assessment that 26% of vehicle movements into Abingdon is 'not considered reflective of a future development' cannot be correct.

APPENDIX E

Sheet 1 Site Access 2 shows zero vehicles leaving Faringdon Road onto Cholswell Road. At Site Access 1 705 vehicles are heading along Barrow Road, yet only 382 (38 + 344) vehicles reach the Barrow Road/Faringdon Road Junction 3. This implies that 323 vehicles stay in Shippon which is clearly not feasible.. We have a speed detection device at a point between Site Access 1 and Junction 3 which provides a wealth of data and we would be very happy to provide this to aid improving the transport delivery report. A video (taken at 8:15 on March 6th 2019) posted on YouTube (<https://www.youtube.com/watch?v=xwGH33V2FRk>) clearly shows a large number of vehicles cutting from Barrow Road, through Elm Tree Walk on to Faringdon Road as traffic backs up on Barrow Road. This is educational commuting traffic and must be added to the Site Access 2 data if it is to present an accurate picture. The TRICS data is equally flawed as it ignores this significant through traffic to and from the Manor Preparatory School in Shippon, 2 private schools (St Helens and St Katherines School and Abingdon School and a secondary school (Larkmead School) on the Faringdon Road along the only route into Abingdon that services these schools. These flaws bring the validity of the data into question.

Sheet 3 As the proposal is to divert Barrow Road traffic through the new development, it should be assumed that all 705 vehicle movements along Barrow Road at Site Access 1 will instead enter the new development and will leave at Site Access 2. Add this to the 104 vehicles currently estimated to enter the site and the total movement into the site will be 809. Add the predicted new additional movements of (137+35) 172 leaving Site Access 2, then there are an estimated 981 vehicle movements along the Faringdon Road/Cholswell Road junction. This represents a 156% increase of vehicle movements at this point.

Sheet 3 indicates that 981 vehicles will pass through the new and existing developed areas. The new site access roads could encounter similar traffic and air quality issues to the village of Marcham which is of great concern to us. It should be noted that to alleviate these issues, a major bypass is proposed for Marcham and proposals for additional development in the village have been significantly reduced.

APPENDIX G

6051 The proposal for Barrow Road East has pedestrian traffic walking along a virtual footway 1.2m wide and only allows 2.9m for 30mph traffic in both directions. This is clearly dangerous. Indeed, OCC Highways staff, during a meeting (13 February 2019) and inspection of Barrow Rd with two members of the Parish Council stated that the proposal for Barrow Rd contained in this report East would not, in their opinion, work.

There is a total lack of consideration for the preservation of the rural landscape and the setting of the heritage assets as specified in draft Main Modification MM4 2.62. The proposed road widths eliminate or reduce current verge space, affect lines of sight at junctions (Sycamore Close to Faringdon Road for example) and may require removal of established trees , for example, along Faringdon Road East.

Q9. Please upload any supporting documents below:

No Response

Q10. Would you like to comment on another Main Modification?

No

Page 11: Part B - your comments

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No Response

Q11. Please provide your comments below:

No Response

Q12. Please upload any supporting documents below:

No Response

Q13. Would you like to comment on another Main Modification?

No Response

Page 13: Part B - your comments

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No Response

Q14. Please provide your comments below:

No Response

Q15. Please upload any supporting documents below:

No Response

Q16. Would you like to comment on another Main Modification?

No Response

Page 15: Part B - your comments

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No Response

Q17. Please provide your comments below:

No Response

Q18. Please upload any supporting documents below:

No Response

Q19. Would you like to comment on another Main Modification?

No Response

Page 17: Part B - your comments

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No Response

Q20. Please provide your comments below:

No Response

Q21. Please upload any supporting documents below:

No Response

Q22. Would you like to comment on another Main Modification?

No Response

Page 19: Part B - your comments

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No Response

Q23. Please provide your comments below:

No Response

Q24. Please upload any supporting documents below:

No Response

Q25. Would you like to comment on another Main Modification?

No Response

Page 21: Part B - your comments

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No Response

Q26. Please provide your comments below:

No Response

Q27. Please upload any supporting documents below:

No Response

Q28. Would you like to comment on another Main Modification?

No Response

Page 23: Part B - your comments

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No Response

Q29. Please provide your comments below:

No Response

Q30. Please upload any supporting documents below:

No Response

Q31. Would you like to comment on another Main Modification?

No Response

Page 25: Part B - your comments

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No Response

Q32. Please provide your comments below:

No Response

Q33. Please upload any supporting documents below:

No Response

Page 27: Future contact preferences

Q34. As explained in our data protection statement, in line with statutory regulations you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. Vale of White Horse and South Oxfordshire District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for Vale of White Horse

