

Submission from County Councillor Yvonne Constance representing SHRIVENHAM DIVISION

1. I write to support the detailed submissions made by Fyfield and Tubney Parish Council and the Fyfield Land Action Group (FLAG) objecting to the proposed allocation of a site for 600/700 houses in the parish of Fyfield & Tubney. I write as County Councillor for Shrivenham with a close interest in the traffic impact of such a development on A420; and also as Vale District Councillor for the Ridgeway Ward with a close interest in the traffic impact on A417 through the village of East Challow, in my Ward west of Wantage, where there is a better alternative site. My position is unique in that I am closely involved with the issues in two possible sites. I intend to add new awareness and information from wider impact on A420 from other permitted or allocated developments rather than repeat the powerful objections from others.
- 2 .As a previously registered objector (see page 217 LPP2 Detailed Policies and Additional Sites : Regulation Consultation Statement Appendix 3 Summary of Representatives) I wish to speak in support of the FLAG objections at the EiP on 24<sup>th</sup> July 2018.
- 3 I endorse FLAG's submission that this site is 'open countryside' and any development of 600/700 houses would be a gross and disproportionate development in a rural setting, with no links to any established settlement and would make a severe impact on traffic on A420, A415 and surrounding villages and roads, whilst making no contribution to known need for infrastructure in the Vale.
- 4 Throughout I refer to and rely on the detailed submissions of FLAG; the final reports of OCC in May 2018; and the submission of Dandara with their proposal of an alternative site 'west of Wantage' in the parish of East Challow:
  - FLAG: Summary of Issues regarding land East of Kingston Bagpuize (LEKB aka KBAG\_A John Bradley -ID 1095527 27<sup>th</sup> April 2018)
  - Fyfield and Tubney Parish Council and FLAG : submission in support of Representation ID: 73025 (Mark Baker ID 1095180)
  - FLAG : The cumulative impact on traffic due to committed and proposed housing developments in Fyfield and Kingston Bagpuize – Southmoor area ( Professor J.H.Cobb ID 1095954)
  - FLAG : Review of Savill's Representation to LPP2 : Core Policies 4a; 8a; Appendix A : Infrastructure delivery plan with regard to proposed Lioncourt development on Land East of Kingston Bagpuize (LEKB or KBAG\_A) located in Fyfield & Tubney Parish (10/04/2018)

and Statement of Common Ground from Oxfordshire County Council (OCC)and VWHDC (May 2018)

I. Objectively Assessed Need and Unmet Housing Need

11. Transport and Safeguarding

111. Local Plan Sites and 1V Evidence

2.

and proposal by Dandara Ltd for alternative site in East Challow ('west of Wantage' in VWHDC parlance!)

## 5. IN SUMMARY

I challenge the allocation of this F&T site on grounds of:

- IMPACT OF TRAFFIC on A420 and A415 and making no contribution to known infrastructure need in the Vale at East Challow (west of Wantage) on A417
- VIABILITY : development funding from this site will not meet the costs of infrastructure required which impacts deliverability of this site
- NECESSITY : land available for 1200 houses at Dalton Barracks is now confirmed. There is still uncertainty about the full capacity on Dalton Barracks (OCC Soundness Issue 10)
- AVAILABILITY of BETTER ALTERNATIVE SITE in East Challow which will deliver the long-known need for a western relief road, to link with the eastern relief road under construction as part of the new build on Crabhill, east of Wantage.

6. The better, alternative site in East Challow has not been considered because the Vale has seen itself bound by the requirement of the Inspector on LPP1 to complete LPP2 (by December 2018) to meet Oxford's Unmet Need within the arbitrary boundary of the Oxford fringe sub area and Abingdon. The better site in East Challow lies about 1 mile (ONE MILE!) outside this boundary. The Vale has maintained this position despite objections from me (as a local Vale District Cllr, and local County Cllr ) and from other Vale councillors, and the very detailed objections from F&T Parish Council and FLAG, and most other parish councils on A420.

7. I submit the Inspector should require a MODIFICATION of LPP2 to fully consider the advantages of the East Challow site – most especially the urgently needed provision of the western relief road. The need for this road was established some 25/30 years ago, and land was safeguarded for a relief road to run from Denchworth Road/ Mably Way roundabout through to A417 to by-pass East Challow . The developments in Grove and west of Wantage ( total of 5.500 houses) provide a greater need and best opportunity to think outside 'the boundary' to deliver an important relief road to the area network around Wantage. In addition a development in East Challow would be within cycling or even walking distance of a future Grove/Wantage railway station, which was not a prospect in consideration when this boundary was set.

## 8. IMPACT OF TRAFFIC on A420 and A415 of developments along A420

SWINDON Borough Council Local Plan 2026 has allocated 8,000 houses on its eastern apron in the Eastern Villages which will be directly on A420; has already developed 1 million sq ft distribution centre at Symmetry Park directly on A420 opposite the Swindon Police Station on A420, and the Sainsbury superstore on the A420 . . .oh and a 1,000 car park and ride on the A420.

The VALE DISTRICT COUNCIL has in addition approved development of more than 3000 houses on A420 south of the Kingston Bagpuize roundabout (864 /950 in Shrivenham; 270 in Watchfield; 1400 in Faringdon; 750 in Kingston Bagpuize) without referring to the impact of the traffic from these developments on the A420 south of Kingston Bagpuize and this proposed allocation.

### 3.

There are no plans to upgrade or extend the capacity of the A420 in the current OCC Local Transport Plan 4.

F&T TRAFFIC IMPACT on A420 and A415:

FLAG has submitted a detailed traffic impact assessment and a review/critique of the Savills/Lioncourt proposals for this site which I endorse. This assessment demonstrates the traffic impact from the F&T proposed development would be greater than has been acknowledged . . . .

And that does not include the impact of traffic from Swindon and Vale developments on the A420! No assessment of the full impact of traffic on A420 has been carried out. DoT guidelines advise that TA should be done PRIOR to publishing the LPP2 proposals; should have included the cumulative impact of all new developments; should rely on contemporary traffic survey and not extrapolate from the last actual travel survey which was in 2012 before major developments along A420.

The Vale has proposed this allocation as if the land lies in isolation from huge development already allocated/approved by Swindon and the Vale, south of Kingston Bagpuize, and has been deaf to the objections. The Vale has not considered the availability of an alternative site which is deliverable, viable and offers real contribution to the Vale's infrastructure needs.

FLAG study identifies the expected increase in traffic from any Lioncourt development as mostly onto A415 through Frilford junction and Marcham . Oxfordshire County Council continues to be concerned about the traffic impact from any development at F&T on the Frilford junction and on Marcham where air quality is monitored in an AQMA as below standard for health. OCC objected to the allocation of 430 houses in Marcham (an established settlement!) for reasons of air quality, but is now concerned that the traffic flow from developments in KB/F&T would increase to higher levels through Marcham – possibly the equivalent of traffic from 530 houses (see F&T traffic assessment)

### 9 DELIVERABILITY

OCC concludes (in final response) that without a major redesign of Frilford Junction on A415/A338 and a Marcham by-pass, any development of the F&T 600/700 will make a SEVERE impact on traffic, unacceptable to OCC (see paras 16 to 223 and para 25 of OCC response on Transport and Safeguarding May 2018.) OCC has not got the evidence to bring forward sites immediately so any development at F&T is dependent on recasting the Frilford lights and building a Marcham by-pass. Lioncourt's proposal makes no contribution to funding these essential infrastructure upgrades.

### 10. VIABILITY :

Developer Lioncourt submits that the developer funding from 600/700 houses will meet the costs of installing 2 roundabouts – one on A420 (a major commercial and commuting route from Swindon to A34/M40 and Oxford) and one on A415 east of the site for 'relief road traffic; a 'relief road' between these roundabouts ( which is not more than an access road to develop the site – does not relieve traffic congestion, but will actually increase it at Frilford and Marcham) ; a school and a retail park.

OCC is not confident that the developer will meet these costs and there is no other funding for the infrastructure required for this site. Even If the developer decides to meet the site- infrastructure costs of these projects, the traffic impact on Frilford junction and Marcham would still not be addressed or funded.

#### 4.

The costs of meeting the full severe traffic impact of development of this site do not make this a viable site – at least until redevelopment of the Frilford lights and a Marcham by-pass.

#### 11. NECESSITY :

OCC deals in detail with meeting Oxford's Unmet Need (see SOCG paper 1 May 2018) accepting in principle the allocation of 2,200 houses to the Vale, and noting that the Oxford fringe sub area and Abingdon are suitable locations to meet Oxford's unmet need. But the Vale does not list the site as suitable in LPP2 Table 2.1.

Dalton Barracks site is now confirmed to provide for 1200 houses in the Plan period to 2031 but the full capacity of Dalton Barracks for 2031 is still not certain. There is some confidence that more land will come forward and more homes can be built on this 'brownfield site' without disturbing the open countryside at F&T. OCC raises this issue as Soundness Issue 10 : the full capacity for development on Dalton Barracks should be identified. This will need to be tested in additional evidence . . . .

#### 12. AVAILABILITY of BETTER ALTERNATIVE SITE

But OCC did not consider an ALTERNATIVE site available NOW, and has refused to assess and process the better alternative site at East Challow. With full consideration and consultation the East Challow site might be more readily deliverable; the western relief road may be met from available developer funds; it would not increase traffic congestion on the major road network of A420/A415/A338 frilford junction or Marcham; and would make a significant and much needed contribution to the Vale's known infrastructure need.

This proposal is put by DANDARA Ltd for consideration by the Inspector. Developer Dandara proposes construction of 700 houses in the north eastern of East Challow , including funding provision of the western relief road (much of which would be required to develop the site) by 2031. (see Dandara Ltd Representation which includes a report on traffic modelling of impact west of Wantage and need for a western relief road)

This site has not been fully assessed. But it could be. And it should be.

#### 13. MODIFICATION of LPP2

I submit a modification of LPP2 is required (and possible within the Dec 2018 time limit) to fully assess and consult the deliverability and advantages of the East Challow site. This site could deliver within the Plan period and contribute to Oxford's Unmet Need with ready access to bus services on A338 (and future prospects of a railway station at Grove/Wantage) without imposing 'severe' traffic congestion on the road network of A420 / A415 /Frilford junction / Marcham.

As more land comes forward at Dalton Barracks it opens possibility that future housing needs (in Growth Deal JSSP to 2050) will be met from Dalton Barracks without the need to develop in open countryside at Fyfield and Tubney.

Cllr. Yvonne Constance OBE

