

Local Plan 2031 Part 2

Publication Version Representation Form Ref:

(For official use only)

Name of the Local Plan to which	this representation relates:
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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*		2. Agent's Details (if applicable)						
*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	Dr							
First Name	Henry							
Last Name	Bennet-Clark							
Job Title (where relevant)	Company Secretary							
Organisation representing (where relevant) Address Line 1	Beaulieu Court Management Company Ltd.							
Address Line 2								
Address Line 3								
Postal Town								
Post Code								
Telephone Number								
Email Address								

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?								
Parag	S	Policy		Policies Map				
4. Do you consider the Local Plan is: (Please tick as appropriate)								
4. (1) Leç	gally comp	bliant		Yes				
4. (2) So	und			Yes			No	
4. (3) Co	mplies wit	h the Duty to Co	operate	Yes			No	

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.

Beaulieu Court Management Company Ltd (BCMC Ltd) objects to the LPP2 as shown below.

The company supports improved 4/4B bus service as the primary public transport provision for the Dalton Barracks site.

BCMC Ltd note the SYSTRA report examining the relative merits of locating the Park and Ride at the A34/A415 Junction or at Lodge Hill. However, we consider the report flawed. It fails to acknowledge the scale of potential development at Dalton Barracks (LPP2 para 2.63) and does not take into account the damage caused by the proposed bus lanes to the openness of the Green Belt across the route proposed for safeguarding. It also fails to consider the opportunities of extending the BRT approach to the Marcham junction site via the A34 in facilitating public transport to the wider Science Vale area. We contend that if, in the long term, linkage to a Park and Ride as part of the OCC Local Transport Plan is fully justified by objective evidence, and therefore deemed essential, the Park and Ride would be better sited at the A34/A415 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 P&R to Marcham is not detrimental to Abingdon Town overall

With the Vale Plan "publicity period" consultation (Fig 2.4) now showing further details of the bus and cycleway safeguarded land between Dalton Barracks and Lodge Hill, BCMC Ltd consider that the plan is **UNSOUND** as set out below:-

The Bus and Cycleways as proposed cause severe detriment to the Green belt. The road surfaces, fencing, lighting (and bus gates or equivalent to prevent unauthorised use) are inappropriate and intrusive on a ridge feature designated as Green Belt. The most recent study of the Green Belt, commissioned by the Vale, by Hankinson Duckett Associates notes that these parcels of land "form part of the footslopes to Boars Hill. Both Parcels are rural in character and are characteristic of the 'Abingdon to Kennington Limestone Ridge with Woodland' local Character Area. The Parcels form the rural setting to the village of Sunningwell. Both Parcels also contain numerous rights of way, which provide rural connections between local settlement and the wider landscape. There are open views of the land within Parcels 8 and 9 from these rights of way. Both Parcels 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 also want to highlight to the Vale that the fields on which the bus / cycleways are proposed are home to a number of skylarks that have nested annually for many years. We understand that the skylark is fully protected under the Wildlife and Countryside Act 1981 and therefore oppose the potential loss of nesting habitat caused by the disturbance that would be a consequence of bus and cycleways as shown in Fig 2.4.

The safeguarding proposals for both the P&R and associated public transport links as shown are premature, unnecessary, ill-conceived and illogical due to

a. uncertainty of future development of the Dalton Barracks site beyond 2031

b. 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 OxCam 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)

c. existing planning protection due to Green Belt status of the land concerned (Vale as planning authority can already prevent all development of the land so there is no necessity to safeguard it)

- d. absence of funding for the outer P&R sites
- e. absence of funding for the proposed A34 bus lane
- f. absence of funding for the cycleway/bus lanes in Sunningwell Parish
- g. uncertainty of the routes commercial viability
- h. probability of the routes detrimental impact to the existing 4/4B service
- i. poor route choices with parts of the route being safeguarded unnecessarily
- j. failure to engage with landowners, Parish Councils and the local community
- k. failure to examine viable alternative options which could include:
 - i. further enhancements to the existing service bus provision
 - ii. routing dedicated "hopper" buses by the existing road network allowing sustainable access to the P&R for a larger population

iii. alternative safeguarding of routes that could provide segregated cycleway provision along the Wootton Road (a scheme that OCC have been trying to put

forward for over 30 years) and increased access by foot and cycle from the North Abingdon strategic site allocation. One example of an alternative scheme is shown in the map below.

BCMC Ltd contend that the safeguarding of land in Sunningwell and Wootton Parishes <u>as shown in Fig 2.4 for bus and cycleways should be removed from the plan.</u>



Example of a potentially less damaging and more effective alternative to routing bus and cycleways provided to illustrate the lack of professional assessment of the options put forward in LPP2 Fig 2.4.

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.

As set out in Box 5 above BCMC Ltd the safeguarding is premature, unnecessary, and illconceived. **The safeguarding for the bus and cycleways between Dalton Barracks as shown in Figure 2.4 and on page 32 of Appendix A should be removed.**

If VWHDC, in its next local plan, progress with further allocations at Dalton Barracks, OCC still intend to progress with the P&R at Lodge Hill (and the funding is available) and the Vale intend to press ahead with safeguarding (assuming a robust evidence base which we do not think is evident from the SYSTRA report) for the connection routes, **we then seek full and**

effective local community engagement and consultation in determining the most effective solution / location to enhance sustainable travel from and to Dalton Barracks so as to minimise the detrimental impact on existing communities including BCMC Ltd. 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? at the grainant of th e outline why **b**, I do not wish to Yes, I wish to YES ssary: rticipate at the participate at the oral ovamination oral avamination Beaulieu Court Management Company Ltd is responsible for the management and maintenance of the collectively owned assets of property owners and residents of Beaulieu Court, Sunningwell. It also represent the collective interests in relation to the common capital assets of its shareholders and safeguarding their long-term financial interests. The Directors of BCMC Ltd consider it absolutely necessary to participate in the EIP to ensure that interests of shareholders (primarily residents of Beaulieu Court) are given full consideration at the EIP Specifically representation in all sessions relevant to the Dalton Barracks site allocation and associated safeguarded transport connections is requested **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



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

Please do not contact me again

no

yes

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.

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

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