



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.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Noel	
Last Name	Newson	
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		

Sharing your details: please see page 3

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?

Paragraph

Policy

8a 8b 12a 13a

Policies Map

Figure 2.4

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

YES

No

4. (2) Sound

Yes

No

NO

4. (3) Compiles with the Duty to Cooperate

Yes

No

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.

Vale of White Horse Local Plan 2031 – Part 2

1: Consultation

I wish to formally **object to the consultation** arrangements in two respects:

- a) The time available for residents to read and review the plan was totally inadequate, particularly given the number of documents involved and the fact that supporting documents were still becoming available during the consultation period;
- b) A new plan was produced showing safeguarded bus and cycle links between Dalton Barracks and a Lodge Hill Park & Ride site, without, as far as I am aware, any prior consultation with the highway authority, the local community or contact with landowners. This was grossly irresponsible and inevitably has resulted in a proposal that is totally discredited as being not only incompetent but a source of great and unnecessary anxiety to local residents.

2. Abingdon & Oxford Fringe Sub-Area

Summary of Objections

In the following text I set out in detail my reasons for objecting to elements of the Plan, but in summary **I Object to the Plan in the following regards**

Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements

- a) Park & Ride site at Cumnor is unsound and premature
- b) Park & Ride site at Lodge Hill is unsound and premature
- c) Provision for a public transport and cycle link between Dalton Barracks and Lodge Hill is unsound and premature

Core Policy 13a: Oxford Green Belt

I object to the safeguarding of Green Belt land for the three highway related schemes I have listed above as being unsound and premature

I also broadly endorse the views expressed on these issues in the consultation responses from Sunningwell Parish Council and SPADE (Sunningwell Parishoners against Damage to the Environment).

3. General comments and arguments in support of my objections

Core Policy 8b: Dalton Barracks Comprehensive Development Framework (and related Safeguarding Maps)

I support the principle of some development of this site, given that - unlike many other sites selected for development in the Local Plan – it is close to an existing commercial bus service linking the site to both Oxford and Abingdon. It is also close enough to Abingdon for a substantial proportion of trips, whether for employment, leisure, retail, education purposes etc, to be made either on foot or by bicycle. The Supporting Paper “A Sustainable Transport Study for the Abingdon to Oxford Corridor” usefully points out that *“The provision of sufficient pedestrian and cycling infrastructure could ultimately reduce the reliance on the private car for short trips into Abingdon which could further reduce existing issues of congestion..... ”* (para. 4.5.12). It is unfortunate of course that the site did not come forward earlier, before less suitable sites were identified for development.

As the policy sets out, the development here should be supported by a comprehensive development framework, but there are flaws in the Site Development Plan set out in Appendix A. My particular focus which I will develop in more detail relates to the highway and access issues.

There are admirable objectives in seeking sustainable transport policies, but some of the measures listed in the development template then threaten to undermine them, by placing too much emphasis on seeking to encourage access to Park & Ride facilities for longer distance journeys, rather than focussing on the primary needs of ensuring excellent public transport links from the site and improving conditions for walking and cycling. If residents of Dalton Barracks are to depend on access to Park & Ride sites for a significant proportion of their trips then I would argue that the site is not suitable for sustainable development. The Council already recognises this in accepting that the initial development of 1200 houses need not be dependent on provision of any new Park & Ride facilities.

However, I do not believe that access to Park & Ride facilities (that in any case may never be provided by the highway authorities) is appropriate for the development of this site, as I will explain below:

1. Even if Park & Ride sites and related bus priority measures are provided at a future date at Lodge Hill, Cumnor, or at the Marcham/A34 Interchange, the existence and enhancement of the existing commercial bus service adjacent to Dalton Barracks, would provide a quicker journey time to much of Oxford than driving to a Park & Ride site and waiting to interchange with a bus. Crucially, this comment applies equally were a dedicated bus link from Dalton Barracks to a Park & Ride to be established whether across the fields near Sunningwell to Lodge Hill or on any other route, unless possibly the additional bus link were running every 5 minutes or so.
2. I recognise that if the proposed Bus Rapid Transit (BRT) network were ever delivered as initially proposed it would offer the possibility of interchanging at Lodge Hill into a BRT vehicle heading to a destination other than north or central Oxford. However, similar interchange opportunities would occur at different points along the existing 4/4B bus route, whether at Cumnor, West Way, Seacourt, Oxford Rail Station or in Oxford city centre. In any event the proportion of residents of Dalton Barracks who would benefit from a link to say East Oxford, would be relatively small.
3. Were a dedicated new bus link from Dalton Barracks to Lodge Hill or another site to be provided, there would be a significant cost of operating a service at the sort of frequency that would offer a competitive advantage over using the existing bus service for the whole trip in to Oxford or beyond. The likely patronage levels would be modest and the service would therefore require significant ongoing revenue support, which would become a financial burden for the foreseeable future. For this reason, the idea of providing a bus link from Dalton Barracks to any Park & Ride site, whether Lodge Hill or elsewhere, should be abandoned immediately and the very substantial capital costs and on-going revenue costs that are saved, should be focussed instead on improving the existing local bus service and the essential requirement of improving the appalling conditions for cyclists and pedestrians on the Wootton Road and other nearby corridors linking Dalton Barracks to Abingdon and Cumnor (which are described in *"A Sustainable Transport Study for the Abingdon to Oxford Corridor"* para 2.6.4 and 2.6.5).
4. Clearly there is therefore **no case for safeguarding routes across land around Sunningwell linking Dalton Barracks and Lodge Hill**. Very few cyclists would wish to cycle 4km or so and then wait for a bus. Those prepared to cycle such a distance would generally intend to use a cycle for the whole of their journey. Bus/cycle links between Dalton Barracks and Lodge Hill across Sunningwell parish as illustrated in the Safeguarding Plans would have many other adverse impacts.

Park & Ride Issues more generally

The initial strategy for developing a system of remote Park & Ride sites which led to the current site selection was undertaken nearly 2 years ago. Things have moved on in that time, not least the availability of Dalton Barracks as a development site, which means that a reappraisal of the pros and cons of a site next to the Marcham/A34 Interchange relative to a site at Lodge Hill is needed. It is important that Oxfordshire County Council review the strategy soon and revisit their site selection. As the Vale's supporting paper *"A Sustainable Transport Study for the Abingdon to Oxford Corridor"* points out there are significant problems associated with both the proposed Cumnor and Lodge Hill sites which, added to the need to reappraise a site at the Marcham Interchange, leads to the conclusion that the current site allocations are premature, unsound and need review. It follows that safeguarding of these sites should also be deleted from the Vale's Local Plan. Their Green Belt status

should effectively protect them from development through the Plan period in any event.

Establishing a Park & Ride car park at the Marcham/A34 junction would have the following advantages over a site at Lodge Hill

- a) A major full movement interchange already exists and a new access to a Park & Ride car park could be accommodated at relatively low cost (arguably much cheaper than at Lodge Hill)
- b) The same number of dedicated Park & Ride buses would be needed to serve this site as at Lodge Hill (*ref: "A Sustainable Transport Study for the Abingdon to Oxford Corridor"*)
- c) The proposed BRT network could usefully be extended to the Marcham interchange (and possibly in to Abingdon town centre)
- d) A Marcham Road site offers the potential to develop a Park & Ride service in to Abingdon, reducing congestion along the Marcham Road and Ock Street corridor and contributing significantly to an improvement in air quality in Abingdon Town Centre
- e) A Marcham Road site could be developed as a hub linking southwards to Harwell and Milton Park as well as to Abingdon and Oxford
- f) The site at Marcham Road/A34 would "cover the same key catchments as the potential Lodge Hill Park & Ride...." (*ref: "A Sustainable Transport Study for the Abingdon to Oxford Corridor"*)
- g) While the bus journey time for trips in to Oxford would be longer from Marcham Road the total travel time from home to destination including the in-car leg could actually be reduced if a northbound bus lane (as proposed north of Lodge Hill) were to be extended back to the Marcham Road interchange
- h) The Lodge Hill site risks abstracting passengers from the existing commercial bus network such as the X3 etc and encouraging more people in North Abingdon to drive from their homes to a Lodge Hill Park & Ride and adding to local traffic
- i) A site at Marcham Road would be far less visually intrusive than the proposed site at Lodge Hill and less damaging in landscape terms
- j) The Marcham Road site is closer to Dalton Barracks, should at a later date it be decided that a link from there to the Park & Ride network was desirable, making it cheaper and easier to provide but would also be close enough for people to walk and cycle
- k) In any event, I believe the safeguarded site at Lodge Hill is in the wrong location and would be better placed to the east of the Old Abingdon Road and north of the A34 (NE quadrant) where it would be much less intrusive and damaging to the environment.

I therefore **Object** to the Local Plan as being **Unsound** for the following reasons

1. The proposed safeguarding of land for the Lodge Hill and Cumnor Park & Ride sites and all the development that would be associated with them is premature and their impact highly detrimental to the environment in these very sensitive landscapes. Nor is there any funding allocated for developing these elements of the Park & Ride and BRT networks. The County Council needs to undertake a further review of its Remote Park & Ride Strategy, and bring it up to date to take account of the changed status of the Dalton Barracks land use, before any sites are allocated for such a use in the Vale of White Horse. It is arguable that a site adjacent to the A34/Marcham Road interchange is in any event, now more appropriate than Lodge Hill.
2. The proposed safeguarding of land to create bus and cycle links from Dalton Barracks to the proposed Lodge Hill Park & Ride site should be removed from the Plan because:
 - a) Even if a Lodge Hill Park & Ride car park were built, such a link would not be attractive to many cyclists

- b) Even if a Lodge Hill Park & Ride car park were built, any bus link would not attract many users, due to the waiting time penalty when changing bus at Lodge Hill, compared to getting the local service bus (4/4B) straight to Oxford
- c) As a consequence of b) above, any bus link would require significant ongoing revenue support, and this money could be more effectively spent supporting the local bus services to Dalton Barracks
- d) Provision of such a link and transfer of patronage, would detract from the viability of the local service bus (4/4B) possibly increasing the need for revenue support for the latter
- e) The capital cost of building such links would be substantial, and also require significant alteration and land acquisition at either of the indicated junctions with Wootton Road (probably outside of the safeguarded land) to safely accommodate bus movements and a better return for this money would be on high quality new infrastructure for cyclists and pedestrians on the Wootton Road and other links to and from Dalton Barracks.
- f) The safeguarded links would do immense damage to the local landscape, particularly noise and visual intrusion, while bringing absolutely no benefit to local residents
- g) Even if one were to promote such a bus and cycle link to Lodge Hill, the actual parcels of land which are being safeguarded for the bus and cycle links are clearly not sensible routes having regard to the local topography, potentially causing unnecessarily great harm to the extent that any future development of such links would not follow much of the safeguarded routes anyway
- h) Given its Green Belt status, it is in any event inconceivable that any development proposal would be approved for any part of the safeguarded land during the coming Plan Period, and therefore no justification for the safeguarding
- i) As far as I am aware, no attempt has been made to consult landowners or the Local Councils on the principle, or the route of the safeguarded links. Clearly no such land should be safeguarded before meaningful consultation with the local community has taken place.

ENDS

(Continue on page 4 /expand box if necessary)

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.

Core Policy 12a: The Safeguarding of Land for the following Strategic Highway Improvements should be removed

- a) Park & Ride site at Cumnor is unsound and premature
- b) Park & Ride site at Lodge Hill is unsound and premature
- c) Provision for a public transport and cycle link between Dalton Barracks and Lodge Hill is unsound and premature

And accordingly,

Core Policy 13a: Oxford Green Belt

The safeguarding of Green Belt land for the above 3 strategic highway improvements should be removed.

(Continue on page 4 /expand box if necessary)

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, 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:

It is essential that these ill-considered and damaging proposals are removed from the Plan.

***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:

Noel Newson

Date:

22nd November 2017

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

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

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