

**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](mailto: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	Mrs	
First Name	Debbie	
Last Name	Dance	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	Oxford Preservation Trust	
Address Line 1	10 Turn Again Lane	
Address Line 2	St Ebbe's	
Address Line 3		
Postal Town	Oxford	
Post Code	OX1 1QL	
Telephone Number	01865 242918	
Email Address	director@oxfordpreservation.org.uk	

**Sharing your details:** please see page 3

## Part B – Please use a separate sheet for each representation

Name or organisation: Oxford Preservation Trust

### 3. To which part of the Local Plan does this representation relate?

Paragraph

2.58,  
2.79-2.82

Policy

Core Policies  
8b, 12a, 22, 37,

Policies Map



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

4. (1) Legally compliant

Yes



No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Complies with the Duty to Cooperate

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.

Oxford Preservation Trust (OPT) takes this opportunity to respond to the consultation on the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites.

OPT was established in 1927 as a charity and local amenity society with the principal aim of conserving and enhancing Oxford and its setting. It takes a forward thinking and positive approach to development, looking to influence change rather than stopping it, preserving the best of the old and encouraging the best of the new. It is committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.

OPT owns and looks after 1000 acres of land in and around Oxford making green space available for local people to benefit from, and enjoy.

OPT has detailed knowledge and expertise built up over a number of years so that it is legitimately recognised as a professional and experienced voice, able to speak with conviction on matters relating to landscape, views and the impact of development on the city of Oxford and its green setting and surrounds.

OPT's comments on this Plan relate generally to the land within the Green Belt within the Abingdon-on-Thames and Oxford Fringe Sub-Area. Specifically, we comment upon:-

- the planning and provision of the transport infrastructure necessary for the development proposed;
- the development of the Dalton Barracks site;
- the potential impact of the Oxford – Cambridge Expressway; and
- the permanence of the Green Belt.

## **Transport Infrastructure**

It appears to OPT that there is a lack of a clear relationship between the land-use allocations within the Vale of the White Horse Local Plan Part 2 and the associated and necessary transport infrastructure.

We are also concerned that this Local Plan is being prepared before the completion of The Oxfordshire Infrastructure Strategy (OxIS). One of the key purposes of OxIS is to “facilitate informed dialogue with communities, developers and key stakeholders on the growth planned and the challenges and opportunities this brings.” In our view, this dialogue ought to inform the Local Plan preparation process, rather than following it.

We have concerns about the cumulative effect on the transport infrastructure of the various planned developments and the cumulative effect on the Green Belt and green setting of Oxford of the additional transport links that may be required.

Consideration of these effects on a County-wide basis as part of OxIS would, we feel, have been more appropriate than the studies carried out in the development of this Local Plan, which are limited in scope to the Vale of the White Horse District.

It appears to us that the publication of the Local Plan at this stage risks development proposals being taken forward without the infrastructure being provided (or indeed funded) in step with them.

Given this situation, we would therefore urge that planning conditions should be strengthened to ensure that development is not granted approval until infrastructure funding is in place and cannot proceed until it is implemented.

## **Dalton Barracks**

The Dalton Barracks site in Abingdon forms a key part of VoWH's housing strategy and have commented previously upon this.

Noting our comments above regarding necessary transport infrastructure to allow this development to happen, we add to this our concerns that this site is to the north-west of the A34, cutting it off from Abingdon, and compromising the sustainability of any new community here. To be sustainable this new development should be primarily accessible by foot, cycle and public transport, with travel by private car restricted, whereas the introduction of new park & ride sites at Lodge Hill and Cumnor suggests reliance on car transport.

We would suggest that a more suitable location for a Park and Ride site would be on a site to north-west of Marcham Road, directly accessed from the existing Marcham Road interchange. This facility, which should be developed in advance of any housing at Dalton Barracks, would have some key benefits:

- a) It would still intercept northbound traffic on the A34
- b) It would reduce traffic on the A34 north of the Marcham Road interchange
- c) The Park & Ride car park would be in a less visually intrusive and damaging location
- d) It eliminates the problems that would otherwise result from traffic rat-running on unsuitable roads through Sunningwell, Boars Hill and Kennington
- e) It eliminates the requirement for the undefined new link between Dalton Barracks and Lodge Hill that is shown in the plan labelled Figure 2.4. We understand the fields crossed by this link provide habitat for skylarks, protected under the Wildlife and Countryside Act 1981.

We are pleased to see the references to the TCPA ‘Garden Village’ principles, in particular

the inclusion of principle 1, relating to Land Value capture for the benefit of the community, which was omitted in the Preferred Options Consultation Document produced earlier this year.

However we would wish to see a clearer commitment to these policies, amending the wording in paragraph 2.58 from:-

“...the Council is keen to explore how these principles can inform the opportunity for development at Dalton Barracks”

To:-

“...the Council is committed to fully incorporating these principles in the development at Dalton Barracks.”

We support the aim of the Garden Village Principles and Core Policy 22 providing an appropriate mix of housing sizes and tenures and would wish to see a firm commitment to the implementation of these policies.

We would also wish to see a firm commitment to Core Policy 37 (Design and Local Distinctiveness) and 38 (Design Strategies for Strategic and Major Development Sites) as well as the Design Guide SPD, in particular commitment to the guidance on minimizing the negative visual impact of solar panels and photovoltaics (Design Guide Principles DG 86 and 77).

The numbers of houses being put forward in this plan varies from a base of 1,200 to in excess of 4,000 (a substantial increase from the Preferred Options document which suggested a potential for 3,000+ dwellings). OPT remains of the view that housing numbers should follow and not lead. It is only once the Garden Village principles have been addressed (including the transport infrastructure needs as described above) that the number of houses that can be accommodated can be agreed, as the principles will dictate the housing numbers and not vice versa.

### **Oxford-Cambridge Expressway**

We note that the Vale of the White Horse Local Plan Part 2 makes only a passing reference to the possibility of the proposed Oxford-Cambridge Expressway cutting through the District. We are concerned that this has not been more deeply explored given the far-reaching consequences that this development would have if the southern route is selected. OPT would want to see full recognition from the Vale of the White Horse District Council of the potential impacts of this scheme in its Local Plan documents.

### **Green Belt – permanence**

In our view of primary importance is the ‘permanence’ of Green Belt (NPPF Paragraph 79). If the “special circumstances” are found justifying the removal of land from the Green Belt for development, then measures must be taken to remedy and /or mitigate this loss. Examples of such measures might be providing replacement land, improving public access to the Green Belt and improving biodiversity.

If Green Belt land is to be replaced, the additional land should be of a similar acreage, so that there is no net loss of the area under Green Belt protection.

In addition, this land should be at least as valuable to Green Belt purposes as the land that is lost. It would not, for instance, be acceptable to include land for recreation if this land was isolated from an urban area. To achieve new Green Belt areas, it may be necessary to require a greater area of land to be included and funding to be provided to improve such things as public access and biodiversity.

OPT would want to see higher contributions put towards enhancement of these areas creating permanent open Green Belt land planned in a positive way as stated at NPPF Paragraph 81 "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access..."

OPT and others have the expertise and the long-term commitment to be able to assist in protecting and managing the green setting of Oxford. It is imperative that 'the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open; and the essential characteristics of Green Belts in their openness and their permanence.' (NPPF Paragraph 79) continue to be achieved.

We hope that our comments will assist VoWH District Council in ensuring that the Local Plan is one that can protect and enhance Oxford and its setting whilst delivering sustainable growth which tries to meet the wider needs of Oxfordshire's communities.

(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.

We consider that the wording of paragraph 2.58 should be amended from:-  
"...the Council is keen to explore how these principles can inform the opportunity for development at Dalton Barracks" to:-  
"...the Council is committed to fully incorporating these principles in the development at Dalton Barracks."

We consider that the proposed Park and Ride site at Lodge Hill referred to in paragraphs 2.79 – 2.82 should be removed from the plan and replaced with a Park and Ride at Marcham. Consequential amendments to the Proposals Map would then be necessary.

We also consider that Vale of the White Horse District Council must make the changes necessary to remedy the failings of the plan in relation to the tests of soundness and the requirement to have regard to national planning policy.

(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:

OPT considers that there are important matters relating to the soundness of the plan that need to be discussed at the Examination and therefore wishes to reserve the right to participate at the Oral Examination. We take a forward thinking and positive approach to development, looking to influence change rather than stopping it. We are recognised as a professional and experienced voice, able to speak with conviction on matters relating to landscape, views and the impact of development on the city of Oxford and its green setting and surrounds, and are committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.

**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:

21/11/2017

### 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](mailto:planning.policy@whitehorsedc.gov.uk)

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