

## Local Plan 2031 Part 2

Publication Version  
Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

VoWHDC of White  
Horse Local Plan 2031  
Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, VoWHDC 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		Mr
First Name		Brian
Last Name		Rixon
Job Title (where relevant)		Clerk
Organisation representing (where relevant)		Sunningwell Parish Council (SPC)
Address Line 1		Granary Acre
Address Line 2		Weir Lane
Address Line 3		Blackthorn
Postal Town		Bicester
Post Code		OX25 1UL
Telephone Number		01869 244769
Email Address		<a href="mailto:clerk@sunningwellpc.org.uk">clerk@sunningwellpc.org.uk</a>

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

Name or organisation: Sunningwell Parish Council

**Please note that we are unable to meet the request for a separate sheet for each representation as our representations cross several interconnected subjects.**

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

Paragraph  Policy  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.

### General

**Sunningwell Parish Council's (SPC) collective view is that the plan as presented is unsound in a number of areas: it draws premature conclusions based on weak and subjective evidence and presents a number of contradictory policies that will cause undue harm to locality.**

Whilst SPC is supportive of many aspects of the Part 2 plan we remain unconvinced that the volume and type of housing is what the locality require. The plan does not sufficiently detail how affordable housing will be delivered, and the long term impact of the national policy has not been objectively assessed.

SPC has significant concerns over a number of late changes that have been incorporated into the final version that has been published for consultation. We are also very concerned that this final consultation has been hastily arranged and many residents affected by the plan have

not had sufficient time to engage in the consultation.

SPC can confirm that we were appropriately consulted during the preferred options stage of the part 2 development. We were given adequate time and opportunity to respond to the draft plan. Although our initial response can be found within the consultation there is little evidence that the small number of observations submitted has been reviewed and the plan adjusted accordingly. At no time between the two consultations was SPC or, to the best of our knowledge, the affected land owners consulted on the changes that have been included; specifically, the land safeguarded for the bus and cycle links from Dalton Barracks to the proposed P&R at Lodge Hill.

The late inclusion without any prior consultation with either SPC or the directly affected landowners on the additional safeguarding of land in the Parish of Sunningwell in the final consultation version of the plan is wholly unacceptable.

During the consultation Period SPC proactively engaged with all the households within the Parish. In conjunction with SPADE all households were advised of the public consultation via all means available (Direct leafleting, Email, Social Media and word of mouth). We attended the public exhibitions organised by the VoWHDC in order to gather objective facts about the latest iteration of the Local Plan. We then organised our own objective briefing at a weekend to ensure as many of the Parish as possible could participate in the consultation. A significant proportion of those we engaged with were surprised at the limited amount of non-proactive action taken by the VoWHDC to consult and that the time available for residents to review the plan and supporting documents was in their view totally inadequate. The published materials are technically complex and difficult for anyone not directly employed in planning policy to comprehend. To overcome this required significant input from unpaid volunteers to translate the plans into an understandable dialogue. Whilst SPC is a statutory consultee and was correctly notified of the consultation, the VoWHDC could have proactively sought our support to engage with those directly affected by the plan. It would appear that the consultation was hastily organised without due regard to the interests of the highway authority, the local community or landowners. SPC believes 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.

We therefore conclude that, in addition to some elements of the plan being unsound, that the VoWHDC has failed in its duty to cooperate.

Finally, we wish to confirm that ~~SPC~~ SPC fully endorse the submissions made by SPADE (Sunningwell Parishioners Against Damage to the Environment) on all aspects of the plan.

---

#### **CP4a - Housing Numbers**

SPC notes and supports Dr Illingworth of the North Abingdon Local Plan Group response to LPP2 outlining the excessive housing requirement for the full plan period (Apr 2011 to Mar 2031).

We understand from the table in CP4a (p26) that the VoWHDC propose 24,748 dwellings in the full plan period. This is an oversupply of 1,998 dwellings above the housing requirement figures. We are surprised that the Vale do not provide this total within the plan and find this

approach unfortunate at best and potentially deliberately misleading.

In line with our previous response SPC seeks greater clarity and explicit wording within the Plan policy to ensure that 5 Year Housing Land Supply figures will be based on “housing need” figures and not the target figure including the oversupply.

### **CP8a/b – Dalton Barracks**

As a matter of principle SPC supports the use of “brownfield” sites for redevelopment over greenfield sites. SPC has previously supported the Dalton Barracks site allocation on this basis, subject to certain conditions. However, this support was on the basis of a genuine need to meet a shortfall against the housing requirement. Even with the addition of the questionable figures to meet the Oxford Unmet Need there is still an oversupply of housing in the Vale area.

As a result of the apparent over-supply SPC seeks reassessment of the allocation at Dalton Barracks so as to either delete it from the plan or to reduce the allocation numbers. SPC also advocates the complete removal of other smaller less sustainable sites including Marcham and Fyfield / Kingston Bagpuize from Local Plan 2031 Part 2.

However, if a housing allocation is made at Dalton Barracks, the intention of the VoWHDC to provide enhancements to the existing 4/4B bus service is supported. SPC also note that it may be possible to reroute the existing 15 service from Witney to Abingdon to the southern extremity of the site. We concur that there is no need to progress bus and cycleway B2 proposed in CP12a to facilitate on site public transport.

If Dalton Barracks is progressed we support the aspiration to create a Garden Village to an exemplar standard. However, our support is conditional on the negative consequences of such development on neighbouring communities being adequately considered and mitigated. The scheme must do all it can to minimise the requirement for additional traffic to use the highly congested or very rural roads currently located with SPC. Many of our roads do not have footpaths and are therefore unsafe for a mixed use of vehicles and pedestrians. We seek the inclusion of policies that specifically require the development to fully mitigate the impact on surrounding communities. Due consideration should also be given to light and sound pollution.

### **CP8a/b and CP13 - Dalton Barracks and the Green Belt**

We object to the removal of Dalton Barracks and the village of Shippon from the Green Belt. We are persuaded by, and support, the arguments of many other organisations such as SPADE and the Campaign to Protect Rural England (CPRE) that there is no justification for the removal of Green Belt status whilst it is still possible to deliver housing on the currently developed site (excluding the runways and open spaces) in line with the guidance in the NPPF.

### **CP8a/b, CP12a and CP13 - Dalton Barracks transport safeguarding and Green Belt**

CP12a and Figure 2.4 details safeguarding for bus and cycleways between Dalton Barracks and Lodge Hill. SPC are opposed to the safeguarding as shown as they cause severe detriment to the Green belt. The bus lanes would presumably include two lane roads to allow operation in both directions at once, fencing, lighting and signage. We also assume that

additional measures will be necessary to prevent to prevent unauthorised use. SPC consider all these elements inappropriate in a Green Belt location. We support SPADE in its assertion that these features do not accord with Para 90 of the NPPF. SPC do not believe that the proposals as shown ‘can demonstrate a requirement for a Green Belt location’ as other alternatives have not been examined objectively.

In addition, the Hankinson Duckett Associates report on the Green Belt also makes it clear that the location is not ‘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 agree with the SPADE comment that the Dalton Barracks – Lodge Hill link (B2) is unnecessary due to the existing planning controls due to Green Belt status of the land concerned due to the ‘very special circumstances’ which would have to be demonstrated to the VoWHDC .

### **Transport links / Safeguarding 8a/b / 12a**

SPC notes and supports the Vale LPP2 response on transport matters submitted by Mr N Newson.

SPC supports the use of public transport wherever possible and encourages walking and cycling in the Parish. Specifically SPC favours use of local bus services as opposed to the remote P&R solutions favoured by Oxfordshire County Council (OCC) in its local transport plan. Therefore as noted above SPC supports the improvement of the 4/4B bus service potentially rerouted through the Dalton Barrack site (although we would not wish to see a reduction in service levels along extensive parts of the Wootton Road and Long Furlong Road).

Having already lost the only local bus service in the parish recently SPC are concerned future plans to provide the linkage as intended with the proposed P&R at Lodge Hill it would further reduce use of the 4/4B service and potentially cause its failure. SPC support the enhancement of this service and oppose any proposals that might cause it to be lost in future.

Whilst SPC recognise that the VoWHDC are not the sole decision making authority concerning the OCC Local Transport Plan in its area, we wish to lobby the Vale on reconsideration of the location of the P&R at Lodge Hill and its safeguarding.

We support SPADE and the overwhelming response of our parishioners that any P&R would be better sited at the A34 / A415 (Marcham) Junction as an integral part of the site allocation and master planning process of the Dalton Barracks site. SPC recognise that the Vale commissioned the SYSTRA report but consider it to be inadequate in examining the opportunities that relocation to the A34/A415 junction could create, especially if the proposed BRT3 approach as detailed in the OCC Local Transport Plan were provided on this hub.

This site would enhance east-west connectivity, including connecting Dalton Barracks with the employment and retail areas in South Abingdon, and be an ideal point to facilitate wider Science Vale travel. This would be particularly beneficial to connections to Culham as the proposed P&R / BRT site at Lodge Hill is too far north and would not fall in the so called “desire line” of commuters in routing between the various Science Vale sites. It also

prevents potential damage to the viability of the X2, 3, &13 services due to users from Abingdon driving to the Park and Ride at Lodge Hill rather than using their local “X” bus stop.

SPC also highlight the comments made by SPADE and others that it would be inappropriate to progress the Dalton Barracks site allocation on the expectation of linking it to a Park and Ride which may never exist. It would be far more logical and forward thinking to provide effective public transport as an integral part of the Dalton Barracks development master planning process. This would allow avoidance of expenditure on costly infrastructure for the bus and cycleways and its use in developing the hub at the A34/A415 junction and the creation of the BRT extension into the Science Vale which as yet has not been considered in any detail.

SPC object to the safeguarding proposals as shown in Figure 2.4 for both the Park and Ride and associated public transport links. We believe that they are inappropriate due to:-

- a. It is unknown if further allocations will be made at the Dalton Barracks site beyond 2031 (the linkage to the Lodge Hill Park and Ride is only an “if necessary,” subject to further allocations as identified in the Site Development Template for Dalton Barracks [Appendix A] p15)
- b. Possible continued operation in perpetuity of the P&R sites, owned by Oxford City Council, rendering the OCC LTP economically unviable and the remote P&R sites unnecessary
- c. Uncertainty caused by the yet to be determined “corridor and route” choices of the Oxford – Cambridge Expressway
- d. The inconsistent approach to safeguarding shown on Fig 2.4 where the linkage shown between the Dalton Barracks site and the A34 is not safeguarded. It is not credible to safeguard arguably unnecessary routes to a non-existent Park and Ride site but not safeguard the only potential route from the development to the closest and most viable junction on the A34
- e. Lack of identified funding for the A34 bus lane, cycleway/bus lanes in Sunningwell and Wootton Parishes and for the Lodge Hill Park and Ride itself
- f. SPC consider the choice of route for the bus and cycleways to be inappropriate and clearly lacking professionalism. We believe there are a number of alternatives that could have been considered including further enhancement of the 4/4B service, use of small buses routing on the existing network or re-routing bus lanes alongside the A34. We understand that the safeguarding proposal did not receive input by OCC Highways before publication by the Vale which is yet another failure in the duty to co-operate. It is completely unsatisfactory for our parishioners to suffer years of uncertainty caused by such unprofessional planning practice
- g. As identified in our initial comments SPC object to the Vale’s complete failure to engage with landowners, Parish Councils and the local community
- h. Finally, SPC have the same fundamental concern as SPADE that if bus and cycle ways are safeguarded in this manner that it would lead to further urbanisation of the area and potentially be expanded to use by all vehicles. Within a Green Belt location it cannot be acceptable or appropriate to build new roads to a remote Park and Ride when there are

other more sustainable options.

**SPC proposes in light of all the points above that the safeguarding of land in Sunningwell and Wootton Parishes for the Park and Ride and the bus and cycle ways as shown in Figure 2.4 should be removed from the plan.**

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.

### **Policy 4a:**

We seek the inclusion of specific policies that require developments to fully fund safety related infrastructure in neighbouring communities (i.e. Traffic calming measures, pavements on rural roads with no public transport, etc.) that will be required as a result of increased traffic flows; and the inclusion of a policy that commits the VoWHDC to withhold planning permission until the required supporting infrastructure has been delivered or at the very least fully funded and delivery contracts signed.

### **Policy 8a:**

SPC seeks either:-

1. the complete removal of the Dalton Barracks site allocation, or
2. a substantial reduction in the numbers allocated to Dalton Barracks and the removal of other smaller less sustainable sites including Marcham and Fyfield / Kingston Bagpuize

from Local Plan 2031 Part 2.

SPC proposes retaining Dalton Barracks and the village of Shippon in the Green Belt and restricting the allocation to the built form of the existing site.

We seek explicit wording in the appropriate policy to clarify that the 5 Year Housing Supply will be based on the OAN and not the target figure including the oversupply.

If Dalton Barracks remains as a development site then SPC is supportive of the proposal to make the best use possible of the Dalton Barracks Brownfield land currently occupied by the MoD but only within the current developed areas excluding the runways and open spaces.

We seek the inclusion of policies that specifically require the Dalton barracks development to fully mitigate the impact on surrounding communities and due consideration should also be given to light and sound pollution.

### **Policy 12a**

SPC seeks further reassessment of the location of any A34 South Corridor Park and Ride site. The subsequent allocation of a major site for up to 4,000 dwellings at Dalton Barracks and the soon to be identified route corridor for the Oxford to Cambridge Expressway require that the OCC Local Transport plan be re-examined to determine if the previous intentions are still fit for purpose. Critically SPC seeks a more objective assessment of the A34/A415 junction location for a fully integrated on-site transport hub including a more creative examination of the BRT approach.

SPC proposes that the safeguarding of land in Sunningwell / Wootton and Cumnor Parishes for the Park and Ride and the bus and cycle ways as shown in Figure 4.2 should be removed from the plan.

### **Policy 13a**

SPC proposes retaining Dalton Barracks and Shippon Village in the Green Belt and restricting the allocation to the built form of the existing site (excluding runways).

SPC proposes that the safeguarding of land in Sunningwell / Wootton and Cumnor Parishes for the Park and Ride and the bus and cycle ways as shown in Figure 4.2 should be removed from the plan as it does not accord with Green Belt protections as per the NPPF.

### **Para 2.126**

SPC contends that the LPP2 is unsound as it fails to examine the full implications of the Oxford – Cambridge Expressway on the VoWHDC area and the Plan's proposals. Bearing in mind that the Corridor choice (undemocratic and un-transparent as that choice process is) will be known by July 2018 (potentially even before the VoWHDC LPP2 EIP) we seek a delay in the Plan process in connection with all developments along all of the current Corridor / Route options. We also seek the provision of more information detailing the full implications of the Expressway on the Plan and site allocations that must have already been made by the VoWHDC to ensure the plan is sound. If this analysis is not available in the public domain, as it has not been conducted, then the plan is unsound and again we seek delay until a full and proper analysis has been undertaken.

### **Development Policy 6**

SPC believes that this policy should be extended to be more specific to reduce likely interpretation conflicts and to detail how the policy will be enforced over time. It is clear that existing policies have not prevented the development of buildings and structures that, in the eyes of the local community, fully respects the rural landscape, character and locality

**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**

**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:

**SPC consider it absolutely necessary to participate in the EIP to ensure that Sunningwell Parishioners are fully represented due to the very contentious issues concerning Dalton Barracks. Particularly the proposed safeguarding of unspecified bus and cycle ways over a very exposed part of Green Belt within the parish which is considered premature, unnecessary, ill-conceived and illogical.**

**We request to attend all sessions involving the Dalton Barracks site allocation, all transport / safeguarding and Green Belt policy sessions**

***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:

**22<sup>nd</sup> 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 VoWHDC 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

**YES**

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

**YES**

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)

**Please return this form by 5pm on Wednesday 22 November 2017 to:** Planning Policy, VoWHDC 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)