



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	Richard	
Last Name	Whitlock	
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

2.72, 2.73
and Fig.2.3

Policy

CP8b

Policies Map

Appendix Map 4

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) Compiles 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.

1. The Plan is unsound as it does not comply with national planning policy relating to Green Belts. It is proposed to take some of the land at Dalton Barracks, Abingdon, out of the Green Belt even though it is open and contributes to the openness of the Green Belt. The "Proposed Inset to the Green Belt" is too widely drawn; its western boundary includes open land beyond the built-up area of the site. These open areas are not required in order to meet housing target figures as the built-up parts of the site are sufficiently large to satisfactorily accommodate the required number of houses.

2. The first and second sentences of the third paragraph of Policy 8b are contradictory and confusing.

(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.

1. The proposed Green Belt boundary should be drawn more tightly around the eastern area of the site which is largely covered with buildings. The Inset area should not include Green Belt land which is open, such as the main runway, other areas of runway, aircraft taxiing routes, standing areas for aircraft, grassland, or any isolated minor structures such as lights

and markers associated with the take-off and landing of aircraft.

2. The first sentence of the third paragraph of Core Policy 8b should be amended to say "The built-up part of the site is removed from the Oxford Green Belt".
3. The map in Figure 2.3, and Map 4 in the Appendices, should both be amended accordingly.

(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.

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:

R A Whitlock

Date:

21st Nov. 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

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

2.80,
Fig. 2.4

Policy

CP12a(i)

Policies Map

Appendix B.1.
map

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

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

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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.

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The Plan is unsound because it allocates a specific parcel of Green Belt land at Cumnor for a park-and-ride site contrary to the advice in national guidance (NPPF para. 90) that such local transport infrastructure must preserve the openness of the Green Belt and not conflict with the purposes of including land within it, and also that this allocation has been made without proper justification or consideration by the planning authority. The development of this site would be extremely damaging to the openness of the Green Belt, would conflict with all the purposes for including land within a Green Belt, and would cause significant harm to the countryside generally.

Para 2.80 of the Plan is also factually incorrect in saying in that this site is identified by Oxfordshire County Council as its preferred location for a new park-and-ride site along the A420.

Please see further details of my objection and supporting evidence on page 4 below.

(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.

1. The allocation of a specific site for a Cumnor park-and-ride should be omitted from the Plan by amending paragraph 2.80 to say;
 - a. "For the above reasons, three locations are safeguarded"
 - b. "One of these sites is identified by Oxfordshire County Council as its preferred location for the new park-and-ride site along the A34 corridor"
2. Core Policy 12a(i) should be omitted.
3. The indication in Figure 2.4 of a "Proposed Future Park-and-Ride at Cumnor" should be deleted.
4. The map titled "Land Safeguarded for Cumnor Park and Ride" in Appendix B1 should be deleted.

(Continue on page 4 /expand box if necessary)

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Signature:

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Additional supporting information to my objection in question 5 above.

Paragraph 90 of the NPPF says that local transport infrastructure is not inappropriate development in a Green Belt provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

The site allocated in the Plan as a park-and-ride development lies in an important sector of the Oxford Green Belt, and is part of the elevated, open, and prominent sweep of countryside south and east of Cumnor village. It lies in an open landscape and contributes greatly to the attractive countryside on this western side of Oxford, as well as to the setting of Cumnor village. It affords very long distance views to the south and west and is overlooked by the wooded heights of Hurst Rise and Boars Hill to the south east. I hope that the Inspector will be able to view this site as part of the consideration of the proposal.

As the background evidence base for the preparation of the latest round of Local Plans two reviews of the Oxford Green Belt were commissioned, one by the Vale (Green Belt Review; Final Phase 2 Report, February 2014, by Kirkham Landscape Planning Ltd./Terra Firma Consultancy), and the other by Oxfordshire County Council on behalf of the Oxfordshire Local Authorities (Oxford Green Belt Study: Final Report, October 2015, by Land Use Consultants Ltd.). These reviews concluded that the site allocated in the Local Plan meets all the purposes of a Green Belt at the highest level, and confirm my comments above.

I assume that copies of these reports will be available to the Inspector and on that basis I will not quote from them. However, I would suggest that the following paragraphs are the relevant ones to my objection.

Kirkham Landscape Planning Ltd/Terra Firma Consultancy, Feb 2014.

Paragraph 5.8;

Pages 33 and 34 (table entry Settlement edge of Cumnor, land east of A420);

Page 54 (table entry for land parcel 4).

Land Use Consultants, Final Report, Oct. 2015.

Page 28, findings re land parcel BO2

The aim of the above reviews was to assess areas of the Green Belt against the main purposes of including land in it. They included detailed assessments of the land parcel which contains the site allocated in the draft Plan for the park-and-ride. In every respect this parcel of land was found by both sets of consultants to contribute

at the highest level to the Oxford Green Belt, to all the purposes for which Green Belts are designated, and to the landscape generally. One study concludes "The parcel therefore plays an essential role in preventing the loss of open land which would cause the visual and physical coalescence of the settlements, and which would potentially be perceived as expansion of Oxford beyond its natural setting." The details of the reports' findings are set out in the appendix. The conclusions clearly show that the site will not meet the requirements of the NPPF, and it is difficult to understand how and why these findings were overlooked or ignored in the decision to allocate this site in the draft Plan.

Paragraph 2.80 of the Plan is misleading in saying that the site at Cumnor is "identified by Oxfordshire County Council" as the preferred location for the new park-and-ride site. The County Council's adopted LTP4 does not propose any specific site, but simply a general location serving the A420 western corridor. The site at Cumnor was identified in a report by transport consultants commissioned by OCC to investigate a number of possible sites in this area. The allocation in the draft Plan has seemingly been made by the planning authority in the mistaken conclusion that the site has been fully investigated by OCC and has been adopted by the highway authority as the site for a Cumnor park-and-ride car park. It is understood that OCC supports the allocation in the Plan, but one would expect them to do so as it provides a safeguarded site should they wish to implement the development at some future unknown occasion. This support is not evidence that the site has been properly evaluated or that it would prove to be the best site.

The consultants' report contains a "Red/Amber/Green" assessment of the sites against various highway or transport criteria but there is no full assessment of what one might call the "planning" factors identified in the NPPF, such as the contribution a site makes to the Green Belt and how it performs against the purposes of Green Belt designation. There is also no assessment against other important factors such as the impact on the landscape, on the countryside, on the setting of villages and nearby residents, air quality issues, local traffic implications, etc. The report has one simplistic statement on environmental issues - "There are no notable environmental constraints identified on the corridor, but all sites are located in the Green Belt area", although it does consider, in depth, factors such as the likely extent and cost of highway improvements, accessibility to existing bus routes, and how "commercial" or not the site might be in terms of unsubsidised bus operations.

It is significant that the consultants' report recognises that further work will be required to demonstrate the case for each individual site as it progresses through the planning process. It says that "assessment, taking the form of a sequential test, would need to capture the alternatives in much greater detail to withstand planning scrutiny. This will be particularly relevant where the sites are within Green Belt or Flood Risk Zones where OCC will be required to demonstrate why there are no suitable alternative locations outside areas with either of these designations." The consultants also indicate (p.59) that the sites around the southern arc of Oxford, at Cumnor, Lodge Hill and Sandford, will need to allow for the issues surrounding the potential Oxford to Cambridge Expressway and a possible A34 to M40 link "to be better understood before any final decisions are made to progress these."

None of this further work envisaged by the consultants has been undertaken by OCC, nor by the Vale DC, and there has been little if any progress on the wider uncertainties identified by the consultants in their report, including;

- the availability of finance;

- the reliance on future Government funding for the essential trunk road improvements to the A420/Botley Road interchange;
- the transport modelling scenarios carried out to predict future demand (which vary widely in their prediction of need);
- the realistic possibility of introducing a work-place parking levy in Oxford;
- the present study into a route for the Oxford/Cambridge "Expressway" route south of Oxford;
- the City Council's current planning application to extend the nearby existing Seacourt park-and-ride site;
- the practicalities of achieving dedicated bus routes and cycle routes into Oxford;
- the effect of other proposed park-and-ride sites (planned to be implemented before the Cumnor site) on commuting patterns etc. etc.

Given the guidance in the NPPF, it should be remembered that park-and-ride sites are much more than an expanse of tarmac and parking spaces. They include large buildings with facilities such as toilets, lighting, bus shelters and ticketing paraphernalia. The consultants engaged by the OCC say (on p. 62 of their report) that "Consideration should also be given to the facilities that would be made available at the sites, including opportunities to provide revenue to support the running costs, for example through provision of click and collect facilities to allow users to collect pre-ordered goods from designated pick-up points." Green Belts were not designated to accommodate possible click-and-collect facilities or other opportunities to provide revenue.

There is no evidence in the Plan that the Vale's officers have scrutinised the consultants' report, or the possible alternative sites for a Cumnor park-and-ride, or that they have made any proper, full, and independent analysis of the site that has been allocated in the Plan. If a Local Plan proposes a specific land allocation, especially in a Green Belt, it should include a full and convincing justification and an assessment against the national and local planning framework. This is lacking in the draft Plan. An allocation now is unsound not only because it conflicts with the advice in the NPPF, but also because it will commit the principle of development of this site and severely restrict any future proper assessment of any planning application for development of the site should one be submitted.

In summary, this proposed allocation is not only contrary to national planning policy but there is no evidence in the Plan of any proper planning investigation or assessment of the site shown on the plans. There are so many uncertainties about the provision of any of these proposed "distant" park-and-ride sites that a Local Plan allocation on any specific site at this stage is premature. If the Cumnor proposal were to be properly assessed against the relevant criteria it would perform badly. The site contributes very significantly to all the purposes of the Oxford Green Belt. Its use as a park-and-ride car park would cause severe harm to the setting of Cumnor village and would introduce a hard urban form of development to an area of particularly attractive open countryside. Much more debate and certainty is needed before such a controversial allocation is included on such a sensitive site in the Oxford Green Belt and I strongly believe that this allocation should not be included in this Local Plan.

Finally, the adopted Local Plan Part One already includes a policy (CP33) regarding highway infrastructure and the criteria that will apply, but a more detailed policy in Part 2 of the Plan might well be helpful. If so, such a policy should ensure that these large park-and-ride-developments, with their attendant buildings, facilities and

highway works, as well as their related works to the link roads into Oxford, cause no harm to the openness of the Green Belt, the countryside, the setting of attractive villages, or the amenities of residents, and are strictly limited in terms of their use. A possible wording of such a policy might be;

"Proposals for local transport infrastructure in the Green Belt, such as park-and-ride sites, will only be approved where they;

- i. preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- ii. cause no significant harm to the character of the countryside, nor to the setting of villages or hamlets; and
- iii. do not adversely affect the amenities of adjoining properties.