

## 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.

Title	<input type="text" value="Mr"/>
First Name	<input type="text" value="David"/>
Last Name	<input type="text" value="Groves"/>
Job Title (where relevant)	<input type="text" value="Clerk to the Council"/>
Organisation representing (where relevant)	<input type="text" value="Kingston Bagpuize with Southmoor Parish Council"/>
Address Line 1	<input type="text" value="55 Blandy Avenue"/>
Address Line 2	<input type="text" value="Southmoor"/>
Address Line 3	<input type="text"/>
Postal Town	<input type="text"/>
Post Code	<input type="text" value="OX13 5DA"/>
Telephone Number	<input type="text"/>
Email Address	<input type="text" value="kingstonbagpuizesouthmoorpc@gmail.com"/>

### 2. Agent's Details (if applicable)

<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>
<input type="text"/>

## 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

4a

Policies Map

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

4. (1) Legally compliant

Yes

☐☐

4. (2) Sound

No

☐☐

4. (3) Complies with the Duty to Cooperate

Yes

☐☐

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.

PLEASE SEE ATTACHED DOCUMENT

(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.



(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:

FULLY EXPLAIN THE FULL IMPACT

PLEASE NOTE THAT THIS REQUEST IS BEING MADE BY THE CLERK ON BEHALF OF THE PARISH COUNCIL AND HENCE A COUNCILLOR WILL PRESENT ORAL REPRESENTATION.

**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<sup>st</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 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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## ABINGDON-ON-THAMES AND OXFORD FRINGE SUB-AREA

**PARISH: FYFIELD AND TUBNEY, SITE NAME: EAST OF KINGSTON BAGPUIZE WITH SOUTHMOOR, 600 DWELLINGS**

**This representation is made on behalf of Kingston Bagpuize with Southmoor Parish Council relating to Core Policy 4a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area.**

1. The allocation of this site in the “larger village” of Kingston Bagpuize with Southmoor is misleading; it is in fact in the parish of Fyfield. These two villages are separated by this site and the A420.
2. Kingston Bagpuize with Southmoor is described as a “*sustainable larger village offering good access to a range of services and facilities and excellent public transport connectivity*”.
3. In the last 5 years, over 400 new homes have been built, with more than 350 having planning permission.
4. This represents an increase of 70% in housing with little improvement in infrastructure or facilities to date. The village has in fact lost or is losing facilities (two public houses and bus services).
5. The adopted Local Plan 2031 Part 1 contained a strategic housing allocation of 280 houses (approved planning application), representing an already significant contribution to Oxford’s unmet housing need.
6. Allocation of this site in effect constitutes a gross extension of Kingston Bagpuize with Southmoor to the east to become continuous with the separate settlement of Fyfield. It is a disproportionate expansion of Kingston Bagpuize with Southmoor, and would double the housing stock to over twice its original size in 5 years. This is contradictory to the spatial strategy to “*promote thriving villages and rural communities whilst safeguarding the countryside and village character.*”
7. This site is Category 2 agricultural land; an analysis of the sustainability of building on this land is not included in the Plan.
8. KBS suffers from heavy congestion on the A420/A415 roundabout. Although the proposed link round may alleviate some of this load, it would fail to do so without implementing further traffic restrictions on both Witney Road and Faringdon Road.
  - “*Alleviate current traffic flows through the centre of KBS*” is explicitly included in the site analysis). Traffic calming measures along Faringdon Road as well as crossings on Witney Road should be implemented. Faringdon Road should include crossings, as well as road width restrictions, 20 mph speeds, entry/exit rumble strips, etc. Traffic restrictions between the current A420 roundabout and the new bypass must restrict traffic coming into the village, especially heavy vehicles, to ‘village only’.
  - The additional junction on the A420 will interrupt the main traffic flows between Swindon and Oxford which will increase road based noise and pollution. The idea of shifting the bus routes along Oxford Road will undue works which is being done now to provide a path and to get buses around the tight bends will ruin the war memorial site.
9. The plan suggests that current public transport will facilitate commuting to work. This is not the case. The 66 bus is often caught up in the peak time traffic along the A420 and only serves the Swindon-Oxford route. Most workers need to commute to Didcot, Abingdon or further afield to London. The 15 bus service (Witney-Abingdon)

is supported by s106 contributions on a year-on-year basis and can be withdrawn by its operator if it fails to make a commercial profit.

- a. The bypass/link road is mentioned in the core document (section 2.31 *"Development on Land East of Kingston Bagpuize with Southmoor provides an opportunity to re-route the A415 out of the existing village (effectively providing a bypass) and deliver a range of local infrastructure, including a new primary school."* However, it is not mentioned in the more detailed site analysis. Full details on planning and funding must be secured, and as a condition to be constructed and in use before any houses are built.
10. Both the A420 (Swindon-Oxford) and A415 (Witney-Abingdon) lack a transport strategy to cope with current and future traffic growth.
11. The National Planning Policy Framework ('NPPF') identifies three dimensions to sustainable development: economic - 'the timely delivery of sufficient land in the right locations to support growth and....coordinating development requirements such as the provision of infrastructure'; social - 'supporting vibrant communities through the provision of housing, the creation of high quality living and working environments and accessible local services; environmental - 'protecting and enhancing our natural built and historic environment, using resources prudently... '. These criteria are reflected in the Vale Local Plan 2031 Part I ('LPP1') by the Strategic Objectives SO3, 8 and 9. The proposal does not meet any of these policies.
12. Conflict with District Council Policies and Objectives: LPP1 includes the following among its key challenges and opportunities which invalidates the conclusions of the assessment:
  - Protecting our high quality landscape. The landscape of the district is central to the rural character of the Vale from the Corillian Ridge to the Lowland Vale to the North Wessex Downs AONB. Key landscape features need to be respected retained and enhanced to maintain the local character and distinctiveness of the landscape of the Vale.
  - LPP1 Spatial Vision state among other things that;: By 2031 ....New development will have respected the local character of the Yale, protecting outstanding and distinctive natural and built environment and will continue to conserve and enhance its important heritage
  - Policy NE7 in the Vale Local Plan 2011, retained in as a saved policy in LPP1, states that 'development which would harm the prevailing character and appearance of the North Vale Corallian Ridge... will not be permitted unless there is an overriding need for the development and all steps will be taken to minimise the impact on the landscape.'
13. In contrast, the principle of Saved Policy NE 10 is reinforced in LLP2's Development policy 28: Settlement Character and Gaps, which reads 'Development proposals that would result in the physical joining or the unacceptable narrowing of a countryside gap between two separate settlements will not be permitted.' In contradiction to this policy the three-fold reduction in the gap between Fyfield and KBS, from well over a kilometre to under 300 metres, has been ignored in the assessment of the site. Again, this invalidates the conclusions of the assessment.
14. Conflict with District Council Settlement Hierarchy:
  - In Core Policy 3: Settlement Hierarchy' LPPI sets out development criteria by decreasing settlement size to meet the future housing requirement' and lists the towns and village of the Vale under four identified categories (market towns, service centres, large villages and smaller villages). Fyfield is not listed in any of the categories and is therefore part of the open countryside

Therefore this area being part of open countryside which is covered by the final sentence of the Core Policy ie development of open countryside will not be appropriate unless specifically supported by other policies.

15. Unsound Evidence Base. There are many passages in LPP2 which provide misleading arguments. The Council outlines but a few:

- Landscape (categorised Green) Fails to recognise location in Corallian Ridge (protected by Saved Policy NE7) or harm to open views to South Oxfordshire downs. Conclusion: should be categorised Red.
- Historic Environment (categorised Amber) Fails to discuss damage to Fyfreld conservation area and its significance as preserving a small rural community: should be categorised Red
- Transport Impact (categorised Amber) fails to quote the LPP2 Sustainability Appraisal's acknowledgement that site is distant from employment centres, or Oxford Growth Board's red flagging the site as too far from Oxford without adequate transport infrastructure. Fails to acknowledge that access to A420 will add to congestion on a stretch of road identified in the Transport and Accessibility study as a congestion hotspot. Ignores the fact that increased congestion on A420 and A415 Conclusion: should be categorised Red
- The above comments apply equally to Access Issues, categorised Green and hence should be Red
- Public Services: does not provide for suitable sustainable access to public services, should be categorised red.
- The recommendation makes claim that the site to be close to historic core of KBS ignoring the fact that the site is more remote from the real centre where most amities are located. Much more remote than other sites that is not proposed for allocation. It also ignores all negative factors and as is quite simply wrong.

### **Foul Drainage:**

The foul drainage problems to handle to recent developments have failed already. The current provision will certainly not be able to take this sort of increase.

### **Infrastructure:**

Promised infrastructure and improvements relating to other developments have not been undertaken or if they have been provided they have failed.

**The Parish Council therefore requests that this site is removed as an allocated site.**