
From: bob w
Sent: 21 November 2017 17:15
To: planning.policy@whitehorse.gov.uk
Cc: bob w
Subject: Local Plan 2031 part 2 response
Attachments: Part 2 Filled Representation form.docx; Part 2 response1 core policy 12a.docx; Part 2 response 2 Core policy 4a.docx; Part 2 response 3 core policy 8b.docx; Part 2 response 4 Section 2 inset boundary.docx; part 2 responsesummary 5.docx

Please find my submission with attachments . Only Part A of your form has been completed
Yet again, the rest of your pro forma defeats me but had I been able to fill it in, it would have been as follows ---

Section B		
Part 3	All boxes would have contained	see following
Part 4	all NO boxes have been filled in	see following
Part 5	see the attachments	
Part 6	see attached summary sheet	
Part 7/8	NO I do not wish to participate.	

For signature and date accept this e-mail

I trust that this is in order and I would be pleased to receive an acknowledgement that all is in order and has been accepted and lodged.

R G Warne



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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Robert"/>	<input type="text"/>
Last Name	<input type="text" value="Warne"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

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

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.

(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:

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:

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

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1----Section2 Additional sites and Sub Area Strategies

Core Policy 12a Safeguarding of Land for strategic highway improvements within the Abingdon-on Thames and Oxford Fringe sub areas.

Paras. 2.80 and 2.82

Unsound

a) Dependency on LTP4

Initially, the first phase of dwellings at Dalton Barracks, 1200 dwellings up to 2031, is to be entirely dependent on existing bus services which will be enhanced.

Surely then, the LPP2 must advocate a policy which encourages Dalton Barracks' residents to use these and any other future bus transport links.

Any other policy will reduce potential carrier numbers, thus revenue, and increase the risk of commercial viability and possible loss of those existing routes serving other the local neighbouring communities such as Wootton and Cumnor.

The remote P&R strategy is unproven and currently, along with the A34 bus lane has no identifiable funding. Nor, it appears, does the strategy have any commercial viability business risk assessment by the OCC, (nor the bus companies as far as I am aware), nor the possible outcomes if that should fail.

There is uncertainty in the relationship as to the impact of any decisions of the OxCam Expressway proposals.

And the future of the existing Red Bridge P&R site. Will it/will it not be closed?

Any estimation of usage of these links is predicated on the fact that a large number of people living in the Dalton Barracks development would wish to travel to and/or work in east Oxford. It must be expected that a substantial number living in the northern part of the development would wish to travel to west Oxford on an existing good bus route. As has been admitted elsewhere during the earlier planning rounds for Part 1 of the Local Plan, it is not possible to dictate where people live. However, if a good access is made to the A 34, as I believe is intended, from the South end of Dalton Barracks this may well influence that the majority of people who come to live here might, in fact, choose to live here because of the easy access south to the Vale Science area.

All of which indicates that any proposal to link the Dalton Barracks to the, currently, entirely speculative P& R proposals at Lodge Hill, lacks any credibility and is an unsustainable option, at least for the life of this plan .

And even the safeguarding policy itself lacks any credibility as there is a noticeable failure to safeguard any potential route, as above, from the south of Dalton Barracks to the A34.

Therefore, the safeguarding of land to provide any bus cycle route to the Lodge Hill P&R proposals, as shown on Fig 2.3 p 44 of the Plan is totally unjustified and unnecessary at this time.

2.78 Duty to consult and working with stakeholders.

It has been acknowledged by both the Vale and OCC officers that the OCC were **not consulted** prior to these safeguarding proposals being laid before Scrutiny on the 20/09/2017.

So much for their Duty to Co-operate etc.

2.82 Impact on the Green Belt

There is no evidence to “demonstrate a requirement” for these routes to be in the Green Belt.

It has been acknowledged in discussion with Vale Planning officers at their public exhibition in Abingdon that I attended, that there has been no thoughtful consideration whatsoever of these routes and purpose, let alone any alternative routes for possible safeguarding .

None for landscape impact, despite the fact that these routes are within the Green Belt.

None for line, structure, cost benefit, nor for its type of construction, or what is intended to be run on any surface, which of course, will define its final width.

None as to whether alternative routes could provide additional opportunities for safe, segregated, walking and cycling route to Abingdon along the Wootton Road from more northerly settlements such as Wootton. This is urgently needed on this currently very busy road, which will get worse. Such a route has been an aspiration and a solution long sought by local residents for the last 20 years.

Officer’s opinion at the public exhibition was that we should not be too concerned at this stage as the routes as proposals were “only indicative “and could change at a later date”. Which, in putting them forward at this time in this manner, illustrates to me Vale’s contempt for the existing residents of the likely impacts of their (literally) thoughtless actions. And a complete lack of professionalism.

This proposal has “morphed” from a brown indefinable smudge shown on the original map, and not even in this location, released on a plan with the original Dalton Barrack proposals a year ago at a public meeting I attended in Wotton, to two roadways across open fields in the Green belt and on a completely different alignment. On questioning Officers at that time I was told not to be “too concerned “then!

Should we now not be even more concerned about these proposals “only” being “indicative” and then “morphing” at some later date, into an even bigger more substantial “link” from Dalton Barracks to Lodge Hill across the Green Belt?

The recent Green Belt Study –Land Surrounding Dalton Barracks, produced by the Vale by Hankinson Duckett Associates, informs us that the parcels of land over which these proposals traverse contain numerous rights of way and are on the slopes of the Abingdon-Kennington Ridge. This ridge is recognised as an important Green Belt feature in recent previous Green Belt studies, having high visibility and landscape value which is unsuitable for development (such as roads with associated fences, lighting etc) and which would harm the openness and integrity of the Green belt.

And, as is so obvious, these parcels being within the existing Green Belt already have protected status against development through the existing powers of the Planning Authority, the Vale of White Horse.

It is clear from the above that these proposals are ill conceived, there being no evidence base and no necessity to safeguard these areas of land at this time with its already established Green Belt protection

Modifications.

- a) In Core policy 12a **Section (iv) be removed from the text**
- b) the text in Para 2.80 **to be removed** in its entirety from this Plan
- c) the proposed alignments and any references to them to **be removed** from Figure 2.4
- d) the Safeguarding map in Appendices B page 32 **be removed** from the plan and indexes
- e) any other associated plans and text which illustrates, refers to, or infers such a safeguarding within the Local Plan 2031 Part2 **to be removed**

SYSTRA report

But is the Park and Ride in the right location?

Whilst I do not believe that the remote P&R strategy is a sustainable one, is there a more preferable alternative location for a Park & Ride than at Lodge Hill?

It has been muted elsewhere in responses to the Part 1 of this plan that a more suitable location would be at the Marcham end of the Dalton Barracks.

Its principle function of intercepting the A 34 traffic still holds and this suggestion certainly deserves a more robust examination than it has been given to date in the SYSTRA report.

O.C.C's LTP4, predating the release of the Dalton Barracks site, was not able to examine in the overall strategy, the outcomes of co- location of a P&R site with this "major change", with a development potential in excess of over 4000 dwellings. And not all of these residents will wish to travel to work in Oxford, but travel south and work in the Vale Science Areas around Harwell.

It fails to examine the sites potential for creating not only a potential connection to the BRT but also in its potential for being a bus hub giving greater connectivity not only to the Culham Science area from commuters travelling from areas such as Witney and Kingston Bagpuize (and therefore ,not going through Abingdon), but opportunities for enhancement of bus services to the South Abingdon employment areas and sensible positioning to takes advantage of the proposals for an east-West link to the south of Abingdon.

Whereas, any P&R at Lodge Hill will have an adverse impact on existing bus services, resulting in Abingdon residents losing the existing excellent bus service that currently travel up the Abingdon Road to Oxford.

The arguments put forward that would discourage people to not use the site "because they have to drive away from their destination first" or that the A34 travellers are diverted from their "desire" line (cannot this argument be used for those that would have to exit at Lodge Hill?) are spurious and sound to me as excuses coming from very close to the bottom of the barrel.

And as for using Google traffic as an evidence base ...what can I say? But it sure aint rigorous or robust!

A firming of the Vale's aspirations around the Dalton Barracks site has reinforced my own opinion that a P&R, integrated within the southern area of the Dalton Barracks development, has a higher degree of credibility than that at Lodge Hill.

I seek, therefore, a reassessment of the OCC Transport Plan in the light of this major change and addition of this strategic site of 4000 dwellings to ensure that the previous decisions are sustainable.

Also a re examination, comprising robust and rigorously assessed evidence, of the capabilities and opportunities for a transport hub, fully integrated within the Dalton Barracks development, at A34/A415 interchange

If, in the future, the Vale insist on progressing with further allocations to the Dalton Barrack sites and the remote Park and Ride facilities at Lodge Hill are operational it is imperative that the Vale have full meaningful consultation with the community to determine the most effective sustainable solution of travel to/from the Dalton Barracks to minimise the impact on local communities.

End

2----Section 2 Additional sites and Sub Area Strategies

Core Policy 4a, meeting our Housing needs Policy

Unsound

In the overview (P20) there is a total of 22,760 housing requirement which includes the Oxford unmet housing need. This figure is also contained in Para 2.7

To give clarity to Para 2.7 and 2.8, the 22,760 figure in 2.7 should be broken down (20,560 and 2200) so as not to infer in Para 2.8 that there is a further additional allocation than already made for in the total.

However, a closer examination of the detailed tables elsewhere in this section would indicate that there appears to be a planning for nearly 2000 more than this figure.

I am aware that the original SHAMA figures are somewhat discredited now and the introduction of another assessment tool gives Local Authorities an opportunity based on need (the OAN figures) to reassess their actual requirements more closely aligned with their area, albeit with other opportunities to add “bells and whistles” to that figure.

Any deviation from OAN needs would appear to put the soundness of the Plan in some jeopardy.

Using OAN derived figures provides the opportunity for Vale to re-examine and remove some of the smaller and less sustainable sites, from this Plan.

It would also reduce the allocation to the Dalton Barracks site, possibly by at least half, with the consequential reduction of the inset area required here and less infrastructure delivery.

Over targeting will lead to land being released from the Green belt and elsewhere unnecessarily. (see also submission Policy 8a and 8b Green Belt0

I would seek clarity within this section as to the exact derivation of the figures in this plan and why Vale is planning for figures which appear to be in excess of a those for the 5YHS, which was thought to be based upon OAN derivations..

Modification

- a) For **clarity** the total figure (22760) for housing delivery in Para 2.7 should be broken down to its component parts.
- b) For **clarity**, explicit wording in the appropriate policies to state that the 5YHS is based on the OAN and not the target figure with appropriate changes in any of the tables.
- c) **Adjustments** to the housing allocation sites to reflect the full plan period numbers and not the target.
- d) **Consequential reductions** to the allocation to Dalton Barracks to a figure not exceeding 500
- e) **Consequential reduction** on Fig 2.3 of the shaded area indicating the inset area within the Dalton Barracks site.

3---Section 2 ---Additional sites and Sub Area Strategies

Core policy 8b---Dalton Barracks Comprehensive Development framework

Unsound

I support the development of the Garden Village Principles within this policy.

However, these principles are not absolute nor all inclusive, leaving a fair degree of interpretation as to what is deemed “compliance”, there being no qualitative standard as to what Vale considers to be “exemplar”

There is a good example of the implementation of many of these principles embedded in the Bicester “eco” village.

To give greater weight to ensuring that the Dalton Barracks development is developed properly and entirely with these principles, I would wish to see here some additional wording, as below or similar, appropriately inserted within C.P 8b giving more explicit guidance within the template as to the Vale’s expectations here.

Modification

“and best practices exemplified in other local Garden Village developments such as that being accomplished by Cherwell District Council within the Eco Village development at Bicester”.

4----Section 2 Additional Sites and Sub Area Strategies

Policy 8a and 13a Green Belt

Unsound

a) Fig.2.3 Inset Boundaries

Perusal of the housing number, which include the allocation for the Oxford unmet housing need yet to be evidenced, would make questionable any need to allocate Dalton Barracks as a Strategic site in the Plan. Even if such allocations were evidenced and included, it is likely that housing numbers would be significantly less than in the Plan and consequently lessens the numbers that are needed to be accommodated at Dalton Barracks to much less than the 1200 proposed.

The glossary to the NPPF defines previously developed land (PDL) which is /was occupied by a permanent structure and any associated fixed surface infrastructure. It also indicates that it should not be assumed that the whole of the curtilage should be developed.

NPPF Para 89 goes on to state that any redevelopment of PDL is an allowable exception within the Green Belt provided that it does not have a greater impact than existing developments.

Therefore, to eliminate the possibility of “development creep” and to comply with this requirement, the inset area within the Green Belt shown on Figure 2.3 should be further reduced by moving the boundary as currently shown on this map, eastwards to restrict the inset area to the currently built form.

b) Fig 2.3 Site allocation boundary

The proposed housing need for this Plan is 1200 houses.

The “park” area surrounding them is clearly disproportionate to these 1200 houses.

It is also clear at this time, to consider any further development outside of this plan as purely speculative.

The Planning Inspector’s final report on the E.I.P. Part 1 Para 2.67 says that, although not ideal, further alterations to Green Belt boundaries established in LPP1 may be necessary but this was “preferable to deleting land from the Green Belt when it was unclear if the released land would be needed for future development”. The Inspector then went on to report that the retention in the Green Belt would not prevent their deletion in future policy or local Plan reviews if the necessary exceptional circumstances were demonstrated.

This, then, is equally the case for the Dalton Barracks site now.

There is no justification, therefore, to release the whole of the Dalton Barracks site from the Green Belt there being sufficient land within the revised inset boundary (repositioned to contain only the existing built form as above) for the initial allocation even if it is 1200 dwellings developed to Garden city principles and enables circumstances for further releases from the green belt if the exceptional circumstances are evidenced.

Modification Core Policy 8b/13a

- a) Para 3 “The site is removed....development framework” is deleted from this policy.
- b) the area shown in Fig 2.3 bounded in red as the strategic site and referred to as Dalton Barracks **should remain** in the existing Green Belt and the Strategic site red boundary line should follow the revised inset boundary line containing the PDL in its currently built form.
- c) **reposition** the inset boundaries currently shown on Figure 2.3 further to the East to ensure that the inset boundary restricts any development here to currently built form only.

End

Proposed modification Summary sheet

Core Policy 4a

- a) **for clarity** the total figure (22760) for housing delivery in Para 2.7 should be broken down into its component parts.
- b) **for clarity**, explicit wording in the appropriate policies to state that the 5YHS is based on the OAN and not the target figure, with appropriate changes to any related tables.
- c) **adjustments** to the housing allocation sites to reflect the full plan period numbers and not the target
- d) **Consequential reductions** to the Dalton Barracks allocation to a figure not to exceed 500
- e) **Consequential reduction** on Fig 2. 3 of the shaded area indicating the inset area within the Dalton Barracks site.

Core Policies 8a and 13a

- a) Para 3—“The site is removed....development framework” **is deleted** from this policy
- b) The area shown in Fig. 2.3 bounded in red as the strategic site and referred to as Dalton Barracks **should remain in the existing Green Belt** and the legends on this map altered to reflect this change.
- c) **Reposition** the inset boundary line shown on Fig 2.3 further east to run commensurate with the currently built forms of hangars and front aprons, service areas and quarters.
- d) the strategic site boundary red line should **be redrawn** to follow the repositioned inset boundary line.

Core Policy 8b

- a) **additional text inserted where appropriate** “and best practices exemplified in other local Garden Village development such as that being accomplished by Cherwell District Council within the eco village development at Bicester

Core Policy 12a

- a) Section (iv) **be removed** from the text
- b) Para 2.80 to **be removed** from the Plan
- c) the proposed safeguarding alignments and any reference to them **be removed from Fig2.4**
- d) The Safeguarding map in Appendix B p32 and any associated text **be removed** from the plan and indexes

In addition I seek

- a) **a reassessment** of the OCC Transport Plan that takes account of the major change of an additional 4000 houses at Dalton Barracks to ensure that previous decisions made to site the Park and Ride at Lodge Hill are still sound.
- b) **a re-examination** comprising robust and rigorously assessed of the capabilities and opportunities for a transport hub fully integrated with the Dalton Barracks development adjacent to the A34/A415 road junction at Marcham

End