From: Annie Thomas

Sent: 21 November 2017 23:04 **To:** Planning Policy Vale

Subject: Vale Local Plan Part 2 - public representation submission

Please find below my submission of comments on the LPP2.

Core Policy 4a/8a

Having examined the plan closely I find it remarkable that there is no total figure in the table supporting CP4a showing the number of dwellings the Vale of White horse is intending to be built between 2015 and 2031. It appears to me that approximately 2000 more homes than are needed are being planned for by the Vale, a fact which is not raised in any text within the plan. This seems a major oversight at best and deceitful at worst.

Assuming that this "hidden" oversupply is intended, I believe the intention to progress sites at Dalton Barracks, Kingston Bagpuize and Marcham are all unnecessary. I therefore OBJECT to these sites' inclusion and believe that they should be deleted from the plan.

I also object to the Vale's acceptance of the apportionment figures by the Oxfordshire Growth Board. Whilst claiming to be accountable and transparent the Board apparently rides roughshod over the wishes of the electorate in Oxfordshire and hides behind the expectation that Local Authority plan process ensures democratic accountability. However, the plan process in the Vale seems to accept the apportionment without question when it is not, in my opinion, legally sound. The Leader of the Vale appears to have unilaterally approved the inclusion of the allocation by his agreement at the Growth Board meeting. As the Leader of South Oxfordshire did not signing up I cannot see how the agreement creates a duty on the Vale to accommodate the alleged need.

If the Oxford unmet need figures are removed from the equation it is clear that sufficient housing has been allocated during the highly damaging LPP1 process and no allocations are warranted.

Dalton Barracks transport links 12a

Should the allocation at Dalton Barracks go ahead it is obvious that the existing service bus routing alongside the site should be made use of to ensure sustainable travel by public transport. The plan apparently intends to do this which I support. Any further development on the Dalton Barracks site should continue to make use of this approach and I therefore strongly object to the potential linkage with the park-and-ride site proposed at Lodge Hill. Specifically I object to the safeguarding of two bus and cycle ways across very exposed areas of Green Belt between Dalton Barracks and Lodge Hill.

I am disappointed that the leader of the Vale agreed with me in a public forum that the Marcham junction was a better place for the park and ride as Dalton Barracks had come forward, but that has not followed through into the plan. I believe full and proper examination of the A34/A415 Marcham junction should be undertaken in light of the current and potential future allocations at Dalton barracks, supplemented by a re-examination of the Oxfordshire County Council Local Transport Plan including the re-routing of the bus rapid transit system based on a transport interchange at the Marcham junction to create a viable public transport system reaching out across the Science Vale. I reject that the Sustainable Transport Study for the Abingdon to Oxford corridor is an objective assessment of the relative merits of Lodge Hill and Marcham.

I therefore object to the safeguarding as proposed and object to the safeguarding of the park-and-ride site at Lodge Hill. I propose that the park-and-ride should be moved to the Marcham junction where it can be developed as an integral part of the garden village approach claimed for Dalton Barracks.

If Dalton Barracks is to be brought forward, it should be done wholeheartedly and fully along the lines of very best practice of the Garden Village. To propose to build new roads to a currently mythical park and ride cuts across that

philosophy in a stunningly ignorant manner. It would be an opportunity lost, not to create Dalton Barracks as an exemplar Garden village but LPP2 risks not achieving that and in the meantime degrading the local environment and creating a negative impact on existing communities.

I oppose the safeguarding of the land for transport links as I believe that they are unnecessary, inappropriate and economically unviable. The safeguarding plan should be removed from LPP2.

1. Unnecessary

- As set out in the Plan, enhancing the existing public transport bus services is considered effective for LPP2 2031 housing allocation. If there are further allocations in subsequent plans it is equally clear that further enhancements would create a truly viable system
- The safeguarding is premature as the plan clearly shows in the appendix that the linkage may only be considered outside the plan period "if necessary." To prevent development along the two routes and cause nearby householders to endure years of uncertainty affecting the marketability of homes in the area when the need for the link is yet to be considered is premature. Safeguarding can be added during a Local Plan Review or during subsequent Plan making processes.
- I also think it is unnecessary to protect the routes as these land parcels already have sufficient safeguards as Green Belt. The Vale would be required to use the highest test of "very special circumstances" to consider any proposals on the land and clearly this would not be forthcoming. Therefore there is no likelihood of any development being permitted that could thwart a later introduction of the scheme and thus the proposed safeguarding is unnecessary.

2. Inappropriate

- I do not believe the routings as shown are appropriate in such a prominent area of Green Belt. The Vale's most recent Green Belt study praises the parcels of land as having "high landscape sensitivity and high visibility" and goes on to say that "neither is suitable for development in landscape and visual terms". It is clearly inappropriate to damage this landscape when other alternatives have not be considered fully.
- Alternative, more appropriate options are easy to identify (but have apparently not been considered) and could include further enhancements to the existing bus services, the use of dedicated hopper buses to a park and ride should it ever be forthcoming or by the use of alternative less visually intrusive and less damaging routings alongside the A34. The route looks like merely the joining up of 2 places on a map with the shortest lines possible, without regard to landscape degradation or the contours of the terrain.

3. Economically unviable

- The enhanced 4/4b bus service would be adversely affected by creating an alternative routing to an offsite park-and-ride. It would render the existing service unviable and deny other communities along that route access to a public transport and therefore create more car dependency.
- Physical infrastructure costs to make the linkage with an off-site park-and-ride system work effectively appears to be disproportionate to the potential benefits. This is particularly the case when it is unknown if the City Council will ever shut the park-and-ride sites at Seacourt and Redbridge. Continued operation of those sites would damage the economic viability of the remote park-and-ride approach within the Local Transport Plan. This is compounded as currently there is no funding in place for the northbound A34 bus lane, the Lodge Hill park-and-ride and the bus and cycle linkages as shown in figure 2.4. All these aspects have to be in place to create a credible linkage and effective remote park-and-ride system.

Green Belt 13a

I also object to the Dalton barracks site being removed wholesale from the Green Belt. The current allocation can be easily accommodated within the current built form and this is provided for within NPPF.

I object to future development across the open expanses of the former aerodrome which should be protected as Green Belt in perpetuity.

I do not accept there are any exceptional circumstances for the removal of this site from the Green Belt. The reasons given by the vale are entirely fatuous. Dalton Barracks need not be removed as a result of needing the housing as there is a planned oversupply within the Plan period. The claim of the sites and "expected availability" is equally

nonsensical. The other reasons given relating to "proximity to Oxford" and its "previous Brownfield status" are again not exceptional circumstances.

I concluded that there is no justifiable reason for the site to be taken out of the Green Belt and I seek its retention as Green Belt within LPP2.

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