

Sunningwell Parishioners Against Damage to the Environment Ref (1096204)

**Supplementary Submission for the Vale of White Horse District Council
Examination in Public of the Local Plan Part 2**

Matter 5.6 – Core policy 12a

Sunningwell Parishioners Against Damage to the Environment (SPADE) provides this document to further aid the Inspector in his deliberations on matter 5.6 – Core Policy 12a in relation to the safeguarding of the proposed routes for the “bus and cycle link” to Dalton Barracks.

This document comprises:-

- 1. Summary of previous submission with further additional points**
- 2. Summary of Oxfordshire County Council response to LPP2 Consultation which is endorsed by SPADE who also call for the safeguarding to be deleted**
- 3. Brief pictorial overview of the specific safeguarded routes proposed by the Vale with comments**

1. Summary of previous submission and further additional points.

SPADE objects to Core Policy 12a on the basis of it being unsound

The safeguarding proposals for both the P&R and associated public transport links as shown are premature, unnecessary, ill-conceived and illogical due to

- a. uncertainty of future development of the Dalton Barracks site beyond 2031**
- b. uncertainty of the long term appropriateness of the OCC Local Transport Plan which proposes the “remote Park and Ride Strategy,”** including Lodge Hill due to the potential impacts of the OxCam Expressway proposals (if a south of Oxford expressway is created, with the intention and effect of freeing up the ring road the current P&Rs will continue to be viable and the outer P&Rs may not be necessary)
- c. existing planning protection due to Green Belt status of the land concerned** (Vale as planning authority can prevent all development on the safeguarded land so it’s unnecessary)
- d. absence of funding for the outer P&R sites**
- e. absence of funding for the proposed A34 bus lane**
- f. absence of funding for the cycleway/bus lanes in Sunningwell, Wootton and St Helen Without Parishes**
- g. uncertainty of the route’s long term commercial viability**

- h. **probability of the route's detrimental impact on the existing 4/4B bus service and failure to provide a frequent service into the retail and employment areas of Abingdon**
- i. **poor route choices with parts of the route being safeguarded unnecessarily and the creation of potential hazards**
- j. assuming stock proof fencing will be required along all parts of the route, this will result in **sub-division of existing fields** making livestock farming untenable and arable farming more difficult. It will also sever wildlife habitats and corridors of the wild deer population
- k. **inconsistent approach to safeguarding** – the Site Development Template [Appendix A] p15 states that 'Access to the A34 should be investigated along with cycle/ pedestrian access to proposed Park and Ride sites at Lodge Hill and Cumnor'. Critically though the linkage to the A34 is not safeguarded. This is clearly inconsistent. How can it be 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?
- l. **failure to engage with landowners, Parish Councils and the local community**
- m. **the Bus and Cycleways as proposed cause severe visual detriment to the Green belt.**
The road surfaces, fencing, lighting (and bus gates or equivalent necessary to prevent unauthorised use) are inappropriate and intrusive on a ridge feature designated as Green Belt. These features do not accord with Para 90 of the NPPF as they fail to "preserve the openness of the Green Belt" and "conflict with the purposes of including land in Green Belt." The fact that the routes appear to be expedient straight lines without any thought to the topography of the site is clearly evident
- n. failure to show a 'requirement for a Green Belt location' as other alternatives have not been examined
- o. the most recent study of the Green Belt, commissioned by the Vale from Hankinson Duckett Associates states that **the land parcels concerned 'have high landscape sensitivity and high visibility and neither is suitable for development in landscape and visual terms'**. The report goes on to state that both have 'a high contribution to at least one of the Green Belt Purposes. **'None of the Parcels are 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'**.
- p. **failure to examine viable alternative options which could include:-**
 - i. further enhancements to the existing service bus provision
 - ii. routing dedicated "hopper" buses by the existing road network allowing sustainable access to the P&R for a larger population
 - iii. alternative less visually intrusive safeguarding of routes that would provide segregated cycleway provision along the Wootton Road and increased access by foot and cycle from the North Abingdon site allocation
- q. **a fundamental concern, that were bus and cycleways ever provided 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

In addition, SPADE contends that the Vale failed to consult the OCC Highways officers on the safeguarding proposals prior to their release in the public domain at the vale Scrutiny meeting on 20th September 2017.

The proposals are a rushed¹ and ill-conceived attempt to bolster a sustainable travel plan from a site that would be better served by existing service buses or better still a joint reappraisal with OCC as to the most effective location for the A34 Corridor Remote park and Ride site (if ever progressed).

Co-location of this major development site (4,500+ homes) with the park and ride is clearly the only logical option (if the remote park and ride strategy were to ever be funded and progressed).

2. Oxfordshire County Council's response to LPP2 identifies further points that are pertinent to SPADE's Objection to CP12a. Specifically OCC:-

- a. Considers that the Vale of White Horse Infrastructure Delivery Plan LPP2 Update October 2017, provided as evidence the Proposed Submission LPP2 document, appears to underestimate the infrastructure needs of the sites proposed for allocation
- b. States that [amongst other things] due to uncertainty in the provision of funding and eventual delivery timetable, "the Park & Ride cannot be part of any mitigation proposal for a site proposed for allocation such as Dalton Barracks."
- c. States "The District's proposal for a bus/cycle link between Dalton Barracks and the Lodge Hill Park & Ride is queried. It is not clear whether a direct bus and/or cycle link to the Park & Ride is necessary or deliverable. It may not be identified as a necessary or appropriate piece of infrastructure for 1,200 homes at Dalton Barracks, nor possibly for the larger development in the longer term. We consider that there is insufficient evidence to support the identification of this scheme. There is also the risk that by suggesting that this be a public transport solution for Dalton Barracks, it could undermine efforts to ensure the site is served by bus services to Abingdon and Oxford, and destinations within Science Vale. A change to the Plan is therefore required..."
- d. States "It is understood that the safeguarding for the bus/cycle link has come from the 'Abingdon to Oxford Sustainable Transport Study'. The County Council considers that this is not robust evidence for this matter. The study includes no discussion of projected demand or the viability of constructing such a route. The need to acquire extensive stretches of land in third party ownership may jeopardise the viability of this scheme in a cost-benefit analysis. The County Council has no plans to include such a proposal in its Local Transport Plan. Instead, the County Council seeks that the 'Abingdon to Oxford Sustainable Transport

¹ Whilst the cycle and pedestrian access to the proposed park and ride sites are mentioned, the Dalton Barracks Site Development Template "Access and Highways" bullet points clearly omit any mention of the safeguarded public transport corridor. This omission is a further example of the rushed, incomplete and ill-conceived addition to the plan at a very late stage.

Study’ be revised in respect of its various references to this (e.g. para 5.3.19, 6.4.7, 6.4.11, 6.4.31). More information on this is given in the Evidence part of this response.”

- e. Criticises various parts of the SYSTRA 2017 Sustainable Transport Study for the Abingdon to Oxford Corridor publication with particular criticism of the proposed Dalton Barracks to proposed Lodge Hill Park and Ride site.
- f. Concludes

“The proposal to safeguard land for potential bus/cycle link between Dalton Barracks and Lodge Hill should be deleted (Core Policy 12a, text in 2.82 and Appendix B).”

SPADE supports the points made by OCC and also seeks that the proposal to safeguard land for potential bus/cycle link between Dalton Barracks and Lodge Hill should be deleted.

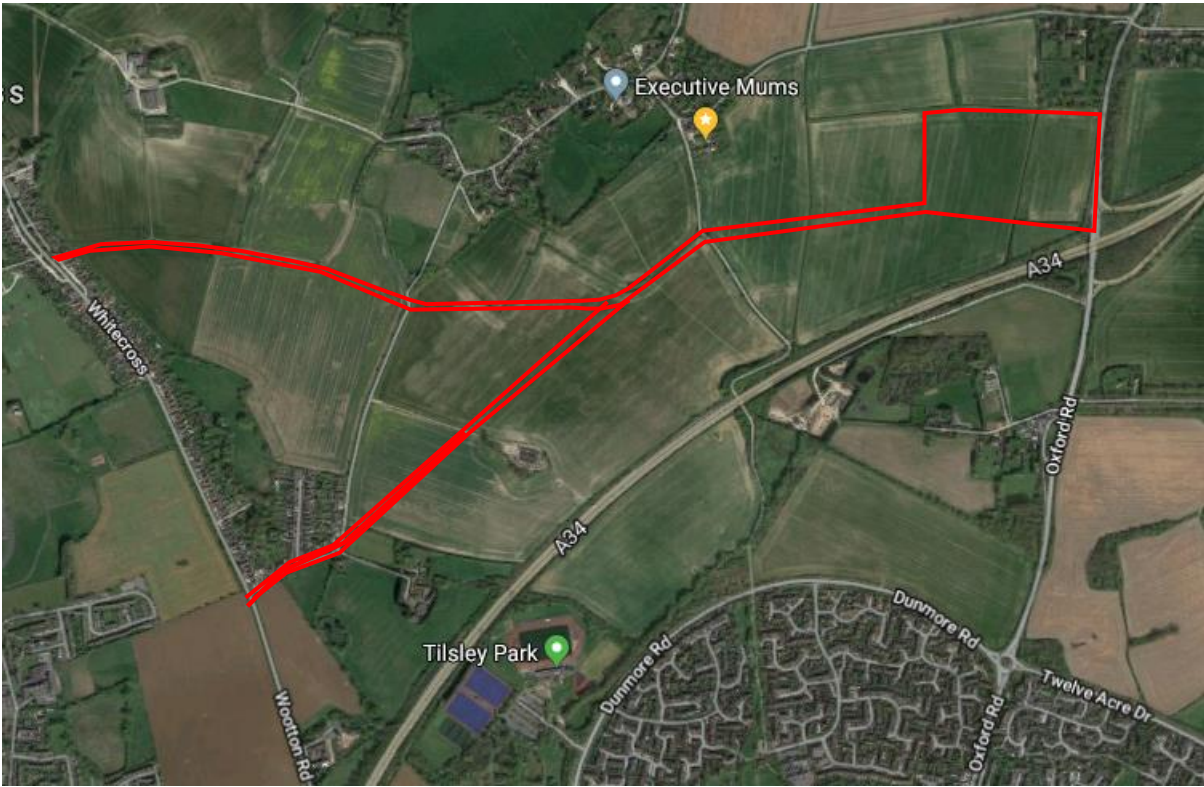
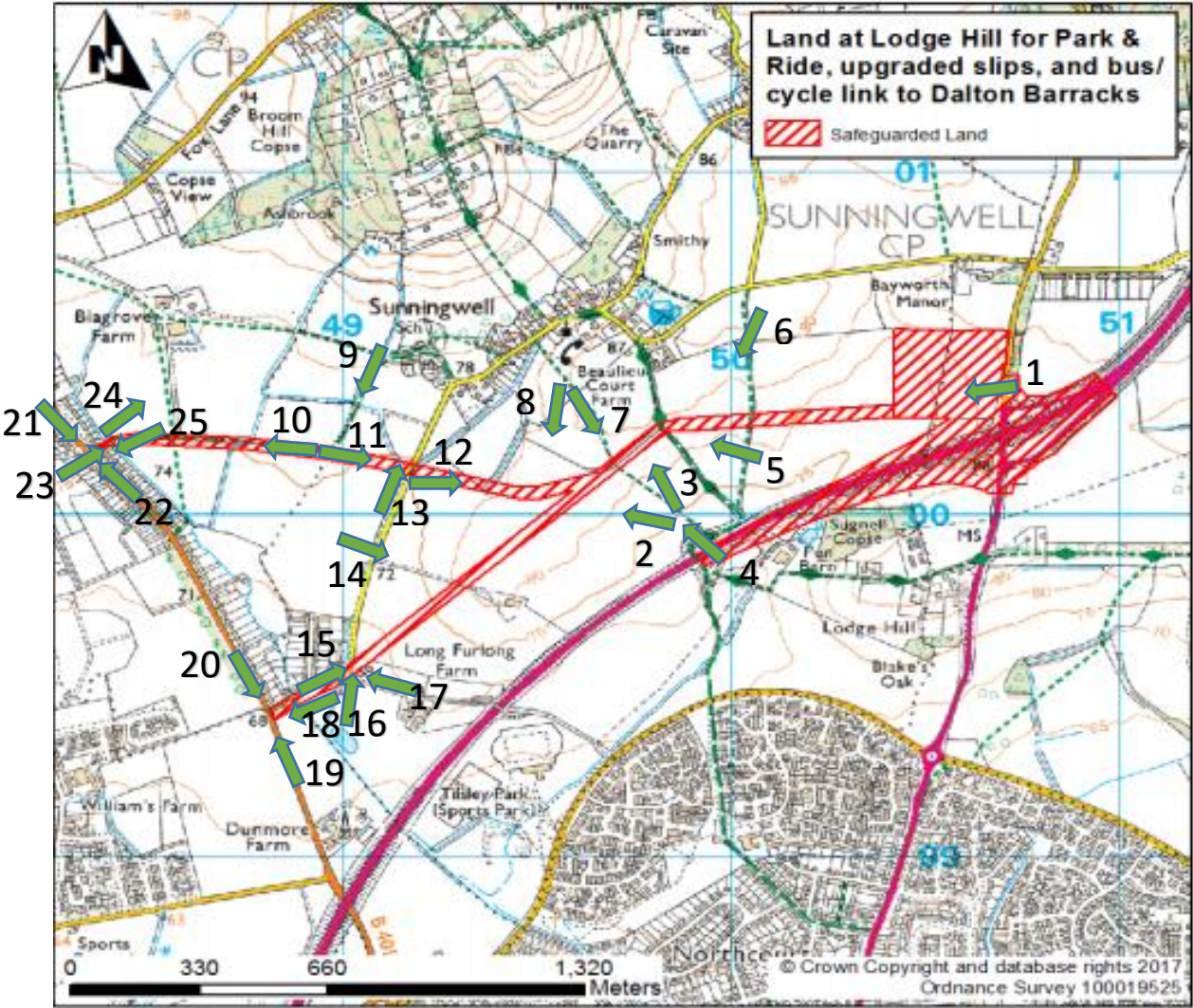
In addition SPADE proposes that the Vale and OCC are directed as a main modification to reconsider the location of the A34 Corridor Remote Park and Ride site (if ever progressed). Co-location of the major development site at Dalton Barracks (4,500+ homes) with the park and ride is clearly the only logical option to create a sustainable site in line with “Garden Village” principles. Para 2.58 indicates that TCPA principles include:-

“integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport”

The Lodge Hill site is a minimum of 2 miles from the current main gate of Dalton Barracks. It is clearly not “integral” to the site nor likely in reality to encourage use of public transport as the economic viability of the scheme is fundamentally challenged by OCC.

3. Brief pictorial overview of the specific safeguarded routes proposed by the Vale

- a. Figure 2.4: Proposed opportunities for highway, public transport, walking and cycling improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area provided in the Local Plan 2031 Part 2 Detailed Policies and Additional Sites publication gives an overview of the setting of the specific Dalton Barracks to the proposed Lodge Hill Park and Ride Site
- b. Appendix B (printed page 31) of the Local Plan 2031 Part 2 Detailed Policies and Additional Sites APPENDICES publication provides a diagram of the safeguarding proposals
- c. This is used below with reference numbers for the following pictures showing details of the routes with a very brief commentary on concerns raised
- d. A “Google Earth” map is also provided to give further insight





1 Site of proposed Park and Ride looking towards main route of bus/cycle link showing the open nature of the Green Belt Location



2 Main route on horizon to rhs of picture. This is the highest point of the ridge feature running between the A34 and Sunningwell Village.



3. Main route on horizon running left to right along hedgerow (note safeguarding map route “straddles” hedgerow so potential loss of hedgerow anticipated). This a continuation of the highest point of the ridge feature running between the A34 and Sunningwell Village.



4. Route runs along horizon straddling hedgerow and then splits and proceeds over the brow of the hill. This also shows the highest point of the ridge feature running between the A34 and Sunningwell Village.



5. Main route runs across picture from clump of trees on the left and then nearer camera than the lone tree on the rhs



6. Looking along the line of the main route which runs to the lhs of the lone tree towards the large clump of trees centre right. This picture illustrates the sub-division of one of numerous fields caused by the route



7. Looking south east – main route runs along the hedge line (again straddling the existing hedgerow). This is the highest point of the ridge feature running between the A34 and Sunningwell Village.



8. Main route runs along the horizon to the centre of the picture and diverges into two legs



9. Looking south west – Wootton Road route crosses foreground by lone tree. Picture shows openness of the Greenbelt location and further sub-division of the fields imposed by the route



10. Route follows the line of this track to the horizon



11. Wootton Road route traverses from picture taker position towards trees on lhs and then climbs up to horizon where it joins the Long Furlong leg which passes along the entire length of the horizon



12. Wootton Road route runs on lhs of picture. Long Furlong route joins near horizon just to rhs of trees and then runs to the right towards the Sunningwell Rd along the horizon. Picture again shows subdivision of fields caused by the routes



13. Point at which the Wootton Rd leg crosses the Sunningwell Road. Note this is on a double bend which crosses a culvert and is the scene of multiple accidents. It appears to be a particularly dangerous location for the junction with added engineering difficulties



14. Track to "Thames Barns" taken from Sunningwell Road. Sunningwell Road route passes this side of the trees along the horizon across the whole picture. It also severs the driveway to the residential barn conversions



15. Long Furlong route where it diverges from the Sunningwell Road on this 80 degree bend further complicated by the entrance driveway to Long Furlong Farm and other residential drives. Route runs just to lhs of “chevron” sign as further illustrated in the next picture



16. Sunningwell Road route runs from this point in a straight line towards the horizon



17. Sunningwell Road route crosses the private drive to Long Furlong Farm adjacent to car in photograph



18. Sunningwell road route looking towards the Wootton Road. The safeguarding straddles the hedgerow on the lhs of the picture and crosses a culvert



19. Junction of Sunningwell Road / Route and Wootton Road. Picture shows the lack of visibility. Note no safeguarding to lhs of Wootton Road making an “offset” mini roundabout (to slow traffic) unfeasible



20. Junction of Sunningwell Road / route and Wootton Road from opposite direction



21. Junction of Wootton Road route and Wootton Road from the North West



22. Junction of Wootton Road route and Wootton Road from the south east



23 Wootton Road route running between two houses



24 Continuation of Wootton Road route running between two houses showing watercourse



25 Reciprocal of 24 - Wootton Road route running between two houses

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10/6/2018