

VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2:

SUMMARY OF THE REPRESENTATIONS RECEIVED FROM PUBLIC CONSULTATION ON THE MAIN MODIFICATIONS TO THE LOCAL PLAN 2031 PART 2 (FEBRUARY- APRIL 2019)

This document provides a summary of the representations received following public consultation, along with an officer response, on the Main Modifications to the Vale of White Horse Local Plan 2031 Part 2: Additional Sites and Detailed Policies from 18 February 2019 to 1 April 2019.

This document is published for information to assist the Inspector. Please note all representations received from the Main Modifications consultation have been sent to the Inspector in their full entirety.

MM1: Gypsies, Travellers and Travelling Showpeople

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM1 concerns supporting text on meeting the needs of Gypsies, Travellers and Travelling Showpeople. The amended text is supported.	Noted. Support welcomed.

MM2: Core Policy 4a: Meeting our Housing Needs

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cllr Emily Smith	Liberal Democrat Group	Housing Need/ Requirements	This response sets out an objection to the housing requirement identified in the Oxfordshire 2014 SHMA and suggests that future work, including the Oxfordshire Plan 2050, will identify an updated Housing Requirement. It is stated that the unmet housing need for Oxford is not yet known. It is suggested that the 2,200 figure should be labelled as a maximum.	The Planning Inspector's Post Hearing Letters make it clear that the Part 2 plan has no remit to revisit the housing requirement established within the Part 1 plan and that the unmet housing need figure of 2,200 homes 'should therefore be used as the basis for meeting the housing needs of Oxford City within the Vale'. The Oxfordshire Plan 2050 will consider the housing requirement for Oxfordshire beyond the existing plan period up to 2050 and is expected to be adopted by 31 March 2021.
Richard Bahu		Policy Wording	This response makes reference to policy wording, for example 'master-planning process involving the community' stating that such cooperation has not been demonstrated by VOWH or DIO. Shippon is referred to as a Smaller Village but does not refer to St Helen	The District Council can confirm that Parish Council and Neighbourhood Plan Group representatives have been invited to and attended a series of meetings with the Council, including workshops relating to the

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			Without Parish. It states that the text does not refer to Shippon plus Dalton Barracks as being equivalent to a larger village, but only to Dalton Barracks.	Neighbourhood Plan and emerging Masterplan SPD for the site. Shippon is correctly referenced as a Smaller Village. The development at Dalton Barracks is described as providing facilities equivalent to a Larger Village. It will be for a future Local Plan process to consider if the Settlement Hierarchy classification for Shippon/ Dalton Barracks should be updated.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM2 sets out the revised housing numbers across the District. The 2,200 dwellings for Oxford City are to be provided between 2019-2031 for 5-year housing land supply purposes, increasing the annual requirement by 183 per annum for that period. Other clarifications are included, the substance of which we deal with later. The amended text is supported.	Noted. Support welcomed.
Katie Gilbert	Thakeham	Housing Need/ Requirements	This response provides a narrative about the housing requirement for Oxfordshire, suggesting that the Oxfordshire Housing and Growth Deal commitment to deliver 100,000 homes up to 2031, is justified largely on grounds linked to the planned Oxford to Cambridge Expressway Arc. It is suggested that a higher level of housing growth should be planned for to future proof the plan. It is also stated that the updating of Part 1 plan allocations to reflect the updated completions and commitment figures should be justified to ensure the change is	The 100,000 homes commitment set out within the Oxfordshire Housing and Growth Deal is based on the 2014 SHMA as reflected in the existing adopted or emerging Local Plans across all Oxfordshire Authorities. It takes no account of the Oxford to Cambridge Expressway, which will be considered through the Oxfordshire Plan 2050 process. The Oxfordshire Plan 2050 will identify a housing requirement for Oxfordshire beyond the current plan period up to 2050 and will be informed by a range of factors, including the Expressway. It is understood that the

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			<p>transparent. It is suggested that relying on known commitments is an unsound approach to plan making.</p> <p>It is stated that there is a windfall allowance of 1,000 dwellings to come forward through neighbourhood plans, where there are only six neighbourhood plans made within the district.</p>	<p>Expressway is unlikely to be constructed until early 2030's.</p> <p>The District Council consider it is usual practice for completions and commitments to be referenced within planned housing supply. The Vale of White Horse performance in the recent Housing Delivery test was 334 %, evidencing a strong track record in housing delivery.</p> <p>The plan is clear that windfalls may come forward through the Development Management process, in addition to Neighbourhood Plans. There is no reliance on delivery from Neighbourhood Plan allocations, but it remains factually correct that future Neighbourhood Plans may allocate sites that could contribute towards supply.</p>
David Wilson Homes (Southern)	David Murray-Cox Turley	Housing Need/ Requirements	<p>This response provides a narrative around the level of proposed supply versus the identified need (25,359, versus 22,760) and repeating their concern over the deliverability of a number of existing commitments and proposed allocations. It is suggested that if the now submitted Oxford City Local Plan and South Oxfordshire Local Plans are taken into account the proposed supply is reported to be 94,236 dwellings against a commitment to deliver 100,000 across Oxfordshire as set out in the Oxfordshire Housing and Growth Deal.</p>	<p>The District Council understands that the proposed housing supply across the adopted and emerging Oxfordshire Local Plans is actually greater than 100,000. The District Council's own track record for housing delivery is very strong as evidenced by the recent Housing Delivery Test figures (334 %) and it is content that the plan provides for sufficient flexibility.</p>

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John Richards	Dandara Ltd	Housing Need/ Requirements	<p>This response from Dandara Ltd provides support for the deletion of the proposed 1,000 homes scheme at Harwell Campus, the deletion of this 1,000 homes from the proposed housing supply is described as 'sound', deletion of reference to the proposed allocation at Dalton Barracks being capable of delivering housing beyond the plan period, and to the inclusion of text that recognises that the 2,200 dwellings for Oxford City will be added to five year housing land supply calculations over the period 2019-31 at 183 dpa. It is however stated that it is unclear if this housing supply calculation will apply to the district as a whole or to the sub-area. It is suggested that an additional footnote is added to explain that the LPP1 allocations figure is updated to reflect these becoming 'known commitments' at the end of the third paragraph of the policy which reads '2,252 dwellings will be delivered through strategic allocations (LPP1 allocations).</p>	<p>Support for deletion of the proposed housing allocation at Harwell Campus and reference to long term development at Dalton Barracks is noted. Land supply calculations are prepared for two separate areas (rest of district and ring fence) as set out within the Part 1 plan, but these figures are combined to provide a single district wide figure. The unmet housing need for Oxford has been added to the Abingdon-on-Thames and Oxford Fringe Sub-Area, the principle of which the Planning Inspector has described in his Post Hearing Letter as 'sound' and so this requirement will fall within the 'rest of district' component of the land supply calculation.</p>
Beata Ginn	Highways England	General Comment	<p>We note that the total housing supply as at 31 March 2018 is 25,359 against a total housing requirement of 22,760 dwellings. The significant main modifications are a rise in known commitments from 3,061 dwellings to 13,387 with proposed windfalls remaining low at 1,000 dwellings.</p>	Noted.

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Adam Day	Gladman Developments	Deliverability	This response raises questions around housing delivery and repeats comments made earlier in the Examination process that Gladman do not consider that 1,200 homes will be delivered at the Dalton Barracks site up to 2031. It is suggested that wording is added to the plan to assist the determination of planning applications in the event that an appropriate land supply cannot be demonstrated.	The District Council is content that the plan provides for sufficient flexibility. This matter was discussed in detail through the Examination process. It is considered that the plan, in combination with national policy, already provides more than sufficient clarity if an appropriate land supply could not be demonstrated in the future.
Bloor Homes	Gillings Planning Daniel Wiseman	Deliverability	It is suggested that the Vale's performance in the recent Housing Delivery Test of 334 % delivery is welcome news, but that it is also evidence that supply may be used up more quickly than anticipated in the Local Plan. An alternative site is discussed that is reported to be available to assist housing supply. A narrative is provided that discusses the importance of housing delivery and in particular providing a mix of sites, including small sites. It is stated that the reduction in the windfall allowance is unfortunate, as from experience, a higher allowance is helpful in ensuring the supply of new homes throughout a plan period.	The District Council is content that the plan provides for sufficient flexibility. This matter was discussed in detail through the Examination process. The District Council is satisfied with the proposed windfall allowance as set out in the Main Modification. It does not restrict additional development coming forward through the Development Management process if proposals are otherwise consistent with the Development Plan taken as a whole.

MM3: Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area

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Susan Halliwell	Oxfordshire County Council	Support/ No Comment	MM3 revises housing numbers in the Abingdon-on-Thames and Oxford Fringe Sub-Area. Dalton Barracks is allocated for around 1,200 homes. The County Council raised issues in its November 2017 response and in its hearing statements given that there had been no strategic transport modelling for a higher number than 1,200. We sought that the full capacity of the site be identified in the Local Plan Part 2, and that capacity be tested on the highway network unless there is some mechanism to restrict planning applications. We accept that with the reduced area and the number set at 1,200, the capacity has been tested. We therefore have no comment.	Noted.
David Wilson Homes (Southern)	David Murray-Cox Turley	Housing Delivery	This response repeats objections made through the Examination process about housing delivery, re-stating concern that the plan makes insufficient provision.	This matter was discussed in detail through the Examination process. The District Council is content that the plan provides sufficient flexibility. The recent Housing Delivery Test result for the district (334 %) provides evidence of strong housing delivery within the Vale of White Horse.
John Richards	Dandara Ltd	Policy Wording	Support is provided for deletion of reference to longer term development at Dalton Barracks beyond the plan period. It is suggested that for clarity, footnote 'a' is added to the end of the second sentence within the second paragraph	Support noted. The District Council consider that the policy wording is sufficiently clear.

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			under the heading 'Housing Delivery' to explain that the LPP1 allocations are reduced to reflect known commitments.	
Richard Bahu		Policy Wording	This response makes reference to policy wording, for example 'master-planning process involving the community' stating that such cooperation has not been demonstrated by VOWH or DIO. Shippon is referred to as a Smaller Village but does not refer to St Helen Without Parish. It states that the text does not refer to Shippon plus Dalton Barracks as being equivalent to a larger village, but only to Dalton Barracks.	The District Council can confirm that Parish Council and Neighbourhood Plan Group representatives have been invited to and attended a series of meetings with the Council, including workshops relating to the Neighbourhood Plan and emerging Masterplan SPD for the site. Shippon is correctly referenced as a Smaller Village. The development at Dalton Barracks is described as providing facilities equivalent to a Larger Village. It will be for a future Local Plan process to consider if the Settlement Hierarchy classification for Shippon/ Dalton Barracks should be updated.

MM4: Core Policy 8b: Dalton Barracks Comprehensive Development Framework

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CEG	Igloo Planning Ian Gillespie	Alternative Site	This comment repeats objections and comments made through the examination process and refers to the extent of land to be released from the Green Belt, the failure to consider an alternative site as a reasonable alternative, the merits of an alternative site, and questions about the deliverability and availability of the Dalton Barracks site.	Noted.
Arnold White Estates	Gardner Planning Geoff Gardner	Delivery	Delivery of the Dalton Barracks site is questioned. It is stated that no date is given for when the MOD will release the site at Dalton Barracks for development. The deletion of reference to development at the site in the longer term is welcomed, although it is stated that there is no assessment or information on infrastructure required for 1,200 homes. It is stated that there is no evidence the site can be delivered within the plan period.	This matter has been considered through the Examination process in detail. The Council is content that the availability and deliverability of the site has been more than adequately addressed.
David Churchouse Janet Banfield Kathryn Bahu Victoria Talbot		Garden Village Development	A number of comments refer to the plan text that references that development will follow Garden Village Principles. It is stated that by definition, a Garden Village should be a standalone settlement and not joined in any way to an existing settlement. It is suggested that any proposals that blur the distinction between different types of 'garden' development must be considered unsound.	This matter has been discussed in detail through the Examination process. The proposed development at Dalton Barracks is currently not formally classified as a 'Garden Village'; it is a proposed Local Plan allocation. The District Council has sought to develop a policy that ensures that any development 'reflects' Garden Village principles in an effort to support high

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<p>Anna Clarke</p> <p>Janet Banfield</p>	<p>St Helen Without Parish Council</p> <p>Wootton and St Helen Without Neighbourhood Plan Steering Group</p>		<p>A number of comments also describe, what they consider to be, the merits of a standalone 'Garden Village' located on the wider airfield and separate to the historic village of Shippon. Responses suggest that this would 'simultaneously separate the settlements visually and physically and unite them through shared amenity green space. In turn, this would enhance Shippon's character and distinctiveness by reinstating a rural approach from the North as well as the South'</p> <p>Some responses articulate their concern for what is described as the 'saddening and uninspired – dump them here' attitude. It is stated that the planning department has dissociated itself from residents and community representatives.</p>	<p>quality development. The District Council has made a submission to Government to seek funding for the development to be classified as a Garden Community; this is an entirely separate process from the Local Plan process. The submission is in accordance with the Ministry of Housing Communities and Local Government 'Garden Communities' guidance published in August 2018. This states very clearly at Paragraphs 2, 5 and 6 that:</p> <ul style="list-style-type: none"> • "this prospectus does not prescribe a single template for a garden community" • that these "new garden communities should make a significant contribution to closing the housing supply gap"...for instance demonstrating "development on predominately brownfield land, being in an area of particularly high housing demand, or ability to expand substantially further in the future" and • that "proposals can be for a discrete new settlement or take the form of transformational development of an existing settlement, both in nature and scale".

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Stephen Coe Carole Page David Mitchell Janet Churchouse Derek James Neil Parkin Jean Fraser Richard Bahu Dennis Walton Janet Banfield Janet Banfield CEG	 Wootton and St Helen Without Neighbourhood Plan Steering Group Igloo Planning Ian Gillespie	General Comment	A range of other general comments are made that include: <ul style="list-style-type: none"> • the importance of maintaining a separation between the development and the existing settlement of Shippon. Many respondents indicate their support for development of 1,200 homes at Abingdon Airfield, along with a proposed Garden Village, but that such a development should be located on the airfield and not related to the settlement of Shippon • it is suggested that air quality and transport impacts have been glossed over • the importance of planning for infrastructure is stressed, along with the need to provide adequate mitigation for any highway impact • detailed comments are provided on the potential road layout of a future scheme • it is suggested that the Spatial Strategy should be applied consistently and that Shippon should be retained consistently as a Smaller Village. 	Please refer to the District Council responses to other comments relating to this Main Modification.

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Jane Cousins Tony Parsons Mrs Parsons				
CEG	Igloo Planning Ian Gillespie	General Objection	<p>This response provides a summary of the Planning Inspector's Post Hearing correspondence and the resultant reduction in the proposed allocation for Dalton Barracks. It is stated that the Council is still proposing to release the 'whole of the main developed area at Dalton Barracks from the Green Belt – which enables further land to be developed without the need for allocation'. The objection raised through the Examination to development at Dalton Barracks is repeated and is re-considered in the context of the reduced allocation. For example, the potential to develop a highly sustainable new community is questioned at a lower scale of development.</p> <p>It is suggested that the removal of reference for more development at Dalton Barracks in the longer-term, undermines the exceptional circumstances case presented by the Council.</p> <p>It is suggested that the Council should not be allowed to sever the link between evidence that supports delivery of 1,200 dwellings at Dalton Barracks, and ignore the</p>	<p>Response noted. The Main Modification responds to the Planning Inspector's Post Hearing Correspondence and reflects the modifications considered necessary for the plan to be found sound. It is understood that the decision to remove reference to the longer-term development potential at Dalton Barracks does not imply that longer-term development should not be considered in the future, simply that evidence for the longer-term development, and any resultant change to the Green Belt Boundary, should be considered through a future Local Plan process. The Council has made clear their response to the Inspector's correspondence in their letters dated 30 October and 20 November 2018.</p>

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			redevelopment capacity of the wider part of the site.	
Beata Ginn	Highways England	Highways England	<p>Main Modification MM4: This is an amendment to the Policies Map and Figure 2.3 which reflects the reduced allocation at Dalton Barracks. The proposed strategic allocation (red-line area) will now only occupy about half of the original site area (southwest part of airfield site). This reduced allocation will result in a reduced impact on the A34 and its junctions which is welcomed by Highways England.</p> <p>Main Modification MM4: This involves amendment(s) to Figures 2.1, 2.2, 2.4, 2.5 and 2.9 to reflect the reduced allocation at Dalton Barracks and/or the deletion of proposed Harwell Campus housing allocation and/or the land safeguarded for an upgraded footpath between Abingdon and Shippon. This reduced allocation of 1,200 dwellings at Dalton Barracks and the removal of the Harwell Campus housing allocation will result in a reduced impact on the A34 and its junctions which is welcomed by Highways England.</p>	Comment noted. The District Council will continue to work closely with key stakeholders, including Highways England and Oxfordshire County Council as Local Highways Authority in planning for development and strategic infrastructure.
Anna Clarke	St Helen Without Parish Council	Historic Character	It is suggested that the plan text referring to the historic centre of Shippon remaining relatively intact and that it still survives as a historic village with a rural approach from	The District Council is content that the policy, as proposed in Main Modification 4, provides sufficient guidance to protect

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			the west along Barrow Road, is contradicted by other plan text referring to Shippon and the existing and proposed development at Dalton Barracks being inset to the Green Belt. This is described as raising questions of soundness of the plan. It is suggested that the only real protection for Shippon would be for it to be retained in the Green Belt.	the historic character of Shippon and its rural approach.
Mrs Debbie Dance	Oxford Preservation Trust	Mapping	Following on from OPT's comments on proposed modification no. MM4 within the Schedule of Proposed Draft Main Modifications, the Trust would suggest that the Policy Map and Figure 2.3 within the Schedule of Draft Maps and Figures should be modified to set out the area to be designated as local green space, so this can form part of the subsequent masterplanning process.	Whilst Local Green Space designations can be designated in Local and Neighbourhood Plans, they are typically considered through a Neighbourhood Plan process. The Local Plan contains a policy relating to protecting existing and planning for appropriate green spaces. Neighbourhood Plan proposals would be considered through a separate Examination process and will need to demonstrate their conformity with appropriate national policy, guidance and legislation. However, the masterplanning process will ensure the proposed development contains appropriate areas of green space as required by the Development Plan policy and Site Development Template.
John Tidbury Mrs Debbie Dance	Oxford Preservation Trust	Policy Wording	A number of comments make reference to the policy wording. Comments include: • Oxfordshire Preservation Trust state that they support the proposed modification 'in principle' but suggest that policy text relating	Comments noted. Please see above for response relating to Local Green Space designations.

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<p>Colin Thomas</p> <p>Richard Bahu</p> <p>John Richards</p> <p>Anna Clarke</p>	<p>Sunningwell Parishioners Against Damage to the Environment (SPADE)</p> <p>Dandara Ltd</p> <p>St Helen Without Parish Council</p>		<p>to part of the site being retained as parkland could be modified to:</p> <p>"The site is removed from the Oxford Green Belt in accordance with Core Policy 13a. The site area, however, contains an area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt compatible development. This area will include an area of local green space (in accordance with the principles set out within government guidance notes) located on the western and northern sides of the site that should be designated within the overall masterplan for the site and retained as such in perpetuity"</p> <ul style="list-style-type: none"> • SPADE (Sunningwell Parishioners Against Damage to the Environment) state that they welcome some aspects of MM4. Including: • Deletion of the "potential for higher growth in the longer term..." in relation to housing numbers at Dalton Barracks in numerous places in the plan. • The commitment that "Any external lighting scheme must have a minimal impact in terms of light pollution". • Other comments question if the change from 'Development Framework' to 'approach to master-planning' is significant. • It is stated that the policy refers to new 	<p>The change of the term 'development framework' to 'master-planning, as per Main Modification 4, reflects the reduced scale of development that is now restricted to a single allocation, with any longer-term potential for development being considered through a future Local Plan process.</p> <p>Reference to Garden Village principles is commented on elsewhere in in this summary relating to Main Modification 4.</p> <p>Reference to 'Education' provision is made at the request of Oxfordshire County Council, who as Education Authority, have responsibility for this matter and ensures the policy provides sufficient flexibility for providing for appropriate needs.</p> <p>The District Council is satisfied that the policy wording, as modified, provides sufficient guidance to support the delivery of high quality and sustainable development.</p>

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			<p>development following 'Garden Village principles' rather than Shippon and the new Development meeting these requirements.</p> <ul style="list-style-type: none"> • The term 'education provision' is questioned if not a new school. • Reference to 'proposals for buildings and structure (including their extensions) will not unacceptably harm the appearance of the surrounding area, taking into account their location, scale, bulk and height' it is stated that this highlights the need for a strategic gap with Shippon. • The transport proposals are described as not appearing to be sustainable and not address the impacts of development. • Reference is made to policy text referring to development 'follow' rather than 'incorporate' Garden Village principles • It is suggested that the policy should state 1,200 dwellings not 'around' 1,200 dwellings <p>• Dandara Ltd state that they support amendments to the Policies Map and Figure 2.3 to reflect the reduced extent of the Dalton Barracks allocation and associated reduction in the quantum of Green Belt to be released.</p>	
Defence Infrastructure Organisation	Carter Jonas Mark Utting	Safeguarding Land	This response from the DIO sets out their support for the Main Modifications consultation and welcome the proposed allocation in addition to the proposal to remove the built-up part of the Barracks site	Noted. The longer-term potential of Dalton Barracks can be considered through a future local plan process.

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			<p>from the Green Belt.</p> <p>It is suggested that given the wider development potential of the site that this land is safeguarded for future development. Evidence is set out about the suitability of the site for longer-term development. Dalton Barracks is described as a 'prime example' of DIO's commitment to the management of its estate and the promotion of an asset that will enable Oxfordshire to meet future housing needs in addition to associated benefits a scheme of this scale can deliver. It is suggested that as a minimum 'signposting' is added to how the Council will continue to view Dalton Barracks as a development opportunity, particularly given its brownfield status.</p>	
<p>Richard Bahu</p> <p>Janet Banfield</p> <p>Mr Philip</p> <p>Janet Banfield</p>	<p>Wootton and St Helen Without Steering Group</p>	<p>Strategic Gap</p>	<p>A number of comments state the importance of preserving a 'strategic gap' between Shippon and any proposed development. It is suggested that Abingdon Airfield is large enough to support a standalone development of 1,200 homes, whilst retaining a strategic gap between the existing settlement at Shippon with any new development.</p> <p>It is suggested that as Shippon is classified as a Smaller Village, and any development proposals are contrary to the Council's Spatial Strategy. It is suggested that the</p>	<p>This matter has been discussed in detail through the Examination process. The District Council understands the strength of feeling amongst some members of the local community concerning the potential for a strategic gap between the existing settlement at Shippon and the proposed development. However, the District Council must consider a wide range of views and evidence from a variety of sources. The wider airfield site is not available for development until much later in the plan period and so relocating</p>

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			<p>Part 2 plan is intended to supplement the Part 1 plan and that reference to the development at Dalton Barracks providing services and facilities equivalent to a 'Larger Village' is also inconsistent with the Spatial Strategy.</p> <p>It is suggested that the proposed allocation could accommodate more than 1,200 homes and that a strategic buffer could be accommodated with little change to the proposed allocation. It is suggested that the proposed allocation could be extended either to the north or west.</p>	<p>the proposed allocation is likely to lead to the need to find alternative sites for development in the plan period up to 2031. The Planning Inspector has already stated in his Post Hearing correspondence that the proposal to allocate the identified unmet housing need for Oxford, to be addressed in the Vale, to the Abingdon-on-Thames and Oxford Fringe Sub-Area, is 'sound'. On this basis, alternative sites for 1,200 homes within this Sub-Area may be needed if it was considered necessary to re-locate development on the wider Abingdon Airfield. The District Council has undertaken a comprehensive process reviewing over 400 sites across the District informed by a comprehensive suite of detailed evidence, including impact on the Green Belt, landscape, the nearby Special Area of Conservation to name a few. The District Council is satisfied that the Dalton Barracks site is the most appropriate overall.</p> <p>The District Council has also undertaken a detailed master planning process for the proposed development at Dalton Barracks through the development of a draft SPD for the site. This has included</p>

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				<p>running workshops that members of the Parish Councils and Neighbourhood Plans group have attended, along with a wide range of stakeholders. Main Modification 4 includes additional text to protect the historic character of Shippon. The Modification also excludes the existing playing fields for development at Shippon that goes some way to provide part of the strategic buffer proposed by the community.</p> <p>It is considered that effective master-planning for the site provides sufficient opportunity to protect the historic character of Shippon, whilst maximising protection for the openness of the Green Belt and balancing the varied objectives that need consideration in planning for strategic scale development.</p>
Susan Halliwell	Oxfordshire County Council	Support. General Comment.	MM4 requires a comprehensive approach to masterplanning at Dalton Barracks. Country Park requirements are changed to an area of parkland reflective of the reduced area allocated. Paragraph 2.64 is amended to include text that the County Council specifically requested concerning the requirement that all phases of development contribute to infrastructure. The amended text is supported.	Noted. Support welcomed.

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Martin Small	Historic England	Support. General Comment.	We welcome and support the proposed addition of "THE HISTORIC CENTRE OF SHIPPON LIES TO THE SOUTH OF DALTON BARRACKS. IT REMAINS RELATIVELY INTACT AND STILL SURVIVES AS A HISTORIC VILLAGE WITH A RURAL APPROACH FROM THE WEST ALONG BARROW ROAD. DEVELOPMENT ON THE SOUTHERN PART OF THE SITE SHOULD RESPECT THE HISTORIC CHARACTER OF SHIPPON AND ITS RURAL APPROACH" to paragraph 2.62.	Noted. Support welcomed.

MM5: Core Policy 13a: Oxford Green Belt

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Beata Ginn	Highways England	General Comment	Main Modification MM5: Amendment to Appendix L: Proposed alterations to the Oxford Green Belt to reflect reduced allocation at Dalton Barracks. Please see our previous comments on the reduced allocation at Dalton Barracks.	Noted.
Sophie Jamieson Susan Trotman		Green Belt	There were a number of objections received relating to this policy, including the following: • There is sufficient land available at Dalton Barracks to meet the identified need without	Objections noted. This matter has been discussed in detail through the Examination process. The Council is satisfied that exceptional

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<p>Janet Pendlington</p> <p>Margaret C. A. Gibbins</p> <p>Christopher J. Gibbins</p> <p>John Tidbury</p> <p>Catherine Carder</p> <p>Martin Gillett</p> <p>Lisa Sparkes</p> <p>Val Dawson</p> <p>M L Jenkins</p> <p>Catherine Webber and Richard Webber</p>			<p>encroaching on the Green Belt</p> <ul style="list-style-type: none"> • No exceptional circumstances for removing the small historic village of Shippon from the Green Belt • Shippon is designated as a smaller village and therefore protected from any new development; 84% of Shippon residents stated they wish to remain a smaller village • Removing Shippon from the Green Belt would harm the historic character of the village and its open green spaces • Shippon should retain its character by establishing a buffer zone between the village and the allocation at Dalton Barracks • Inspector's letter dated 30 October 2018 inferred that there would be no change to the status of the green belt, yet position is now reversed • Community's views on this matter have not been properly taken into account • Parishes of Shippon and Wootton have been working with the Council on a joint Neighbourhood Plan which supported moderate development at Dalton Barracks providing the ecological buffer of the Green Belt remains • Unsustainable to remove land from the Green Belt due to impacts on ecology, flood risk and air pollution • Shippon is defined as a smaller village in the adopted Local Plan 2031 Part 1. Plan's Spatial Strategy states that only limited infill 	<p>circumstances exist to justify the removal of land at Dalton Barracks and Shippon from the Green Belt. This principle has been tested through the examination process.</p> <p>Core Policy 13a: Oxford Green Belt proposes to inset the settlement of Shippon (including the proposed and existing development at Dalton Barracks) from the Green Belt as reflected in the Inspector's post hearing correspondence to the Council dated 30 October 2018 (PC03) and 27 November 2018 (PC03.3).</p> <p>For clarity, the village of Shippon would be treated equal to other Green Belt inset villages in the district. For instance, any future development proposals within the village of Shippon will be subject to protective policies in the adopted Local Plan 2031 Part 1 and Local Plan 2031 Part 2, including Core Policy 37: Design and Local Distinctiveness, Core Policy 39: The Historic Environment, Development Policy 29: Settlement Character and Gaps and Development Policy 36: Heritage Assets, as indicated in the Inspector's post-hearing</p>

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<p>Paul Belcher</p> <p>Janine Elliott</p> <p>Kate Aydin</p> <p>Carole Page</p> <p>David Mitchell</p> <p>Philip Carder</p> <p>John Elliott</p> <p>Judy Stubley</p> <p>Jean Jones</p> <p>Richard Jones</p> <p>David Churchouse</p> <p>Janet Churchouse</p>			<p>is permitted</p> <ul style="list-style-type: none"> • Strategic buffer should be established between Shippon and the allocation to ensure no risk of coalescence, establish own identity and ensure they are visually and physically separated • Reference is made to an appeal decision at Lincolnshire, a policy in the Great Coxwell Neighbourhood Plan and Saved Policy NE10 of the Local Plan 2011 • Council should demonstrate that it has examined fully all other reasonable options for meeting its identified need for development • Unclear which area is proposed for housing development • Proposal is not in line with the Garden Village Principles. 	<p>correspondence dated 24 January 2019 (PC04.2).</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Thomas O'Donoghue	Wootton and St Helen Without Neighbourhood Plan Steering Group			
Derek James				
Ian Jopson				
Neil Parkin				
Jean Fraser				
Richard Bahu				
Robin Draper				
Dennis Walton				
Janet Banfield				
Janet Banfield				
Nickie Mundy				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Kathryn Bahu				
Elspeth Pendlington				
Gordon James				
Caroline Parkin				
Victoria Talbot				
Julie Bradford				
Lesley Woods				
Mr and Mrs Richardson				
David John Freeman				
Ian Pendlington				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Moira Hinkley-Smith				
Gordon Dawson				
Patricia L Evans				
Geoffrey Twinn				
Mr Philip				
Michael Page				
Ian Talbot				
Pearl Lewis				
Madeleine Russell				
Christine Haylett				
Debby Hallett				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Terry Bremble Susan Ashdown Arnold White Estates Cllr Emily Smith Anna Clarke Helen Marshall	Gardner Planning Geoff Gardner Liberal Democrat Group St Helen Without Parish Council CPRE			
Janet Banfield	Wootton and St Helen Without Neighbourhood Plan Steering Group	Policy Wording	We are pleased to note the inclusion of provision to ensure the minimisation of impacts in terms of light pollution arising from the proposed development.	Noted. Support welcomed.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM5 relates to the Green Belt changes affecting Dalton Barracks. We have no comment.	Noted.

MM6: Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Mr Noel Newson		Deletion Public Transport/ Cycle Link	I welcome some of the changes made and in particular deletion of reference to provision of a cycle and bus link between Dalton Barracks and Lodge Hill.	Noted. Support welcomed.
Mr Noel Newson		Deletion Public Transport/ Cycle Link	<p>Welcome deletion of reference to a public transport and cycle link between Dalton Barracks and Lodge Hill.</p> <p>Ensuring excellent public transport, cycle way and footpath connections to Oxford and Abingdon-on-Thames is a justification for removing the land from the Green Belt.</p>	Noted. Support welcomed.
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE)	Deletion Public Transport/ Cycle Link	<p>SPADE welcomes some aspects of MM4, specifically:</p> <p>1. The deletion of the safeguarding for the public transport / cycle connection between Dalton Barracks and the proposed (unfunded) Park and Ride at Lodge Hill. Following the Inspector's Post Hearing Letters dated 30th October and 19th Dec 2018 we are pleased that the Vale have belatedly accepted comments that "these routes are not justified and should be deleted from the plan."</p>	Noted. Support welcomed.
Cllr Emily Smith	Liberal Democrat Group	Deletion Public Transport/ Cycle Link	We welcome the deletion of the safeguarding for the public transport/cycle connection between Dalton Barracks and the proposed Park and Ride at Lodge Hill and fully agree	Noted. Support welcomed.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			with the Planning Inspector's comment that "these routes are not justified and should be deleted from the plan." We also support the deletion of the "potential for higher growth in the longer term..." in relation to housing numbers at Dalton Barracks in numerous places in the plan.	
Susan Halliwell	Oxfordshire County Council	Deletion Public Transport/ Cycle Link	There is also the deletion of text as it is no longer proposed to safeguard a bus and cycle link between Dalton Barracks and Lodge Hill. We requested this deletion and support the modification.	Noted. Support welcomed.
Janet Banfield	Wootton and St Helen Without Neighbourhood Plan Steering Group	Deletion Public Transport/ Cycle Link	The WSHWNP Steering Group is relieved to see that the proposal to safeguard land for bus and cycle routes between the proposed development at Dalton Barracks/Abingdon Airfield and the proposed Park and Ride at Lodge Hill has been deleted	Noted. Support welcomed.
Beata Ginn	Highways England	General Comment	Highways England commented that the deletion of the bus/cycle link to Dalton Barracks does not impact on the land safeguarded for Lodge Hill Park and Ride. Highways England welcome upgrades to existing walking and cycling facilities, but request to be consulted for any future works in close proximity to the A34.	Noted.
Arnold White Estates	Gardner Planning Geoff Gardner	Policy Wording	Paragraph 2.76 still maintains the site as a 'highly sustainable and significant site for development' despite modification to Paragraph 2.75.	Noted. The Council is content the site remains a highly sustainable and significant site for development with

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
				even greater potential for development in the longer-term.
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE)	Policy Wording	The indicative route for the improved bus service to Oxford and Abingdon via Shippon/Dalton Barracks on Figure 2.4 is unamended as it does not touch the modified boundary for the Dalton Barracks allocation.	Noted. Whilst Figure 2.4 is illustrative, the relevant arrow could be expanded to the existing settlement of Shippon.
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE)	Safeguarding for Upgraded Footpath	<p>SPADE supports the addition in Para 2.82 for the safeguarding for an upgraded footpath between Shippon and Abingdon-on-Thames.</p> <p>However, the safeguarding is apparently designed to allow a new accessible bridge over the A34 and potentially the Abingdon perimeter road. SPADE suggests that the Vale consider upgrading this proposed footway to become an off-road cycleway to connect more directly with the cycle facilities along the Abingdon perimeter road that could connect to the proposed Park and Ride at Lodge Hill. If this was done with a further modification of the Pen Lane bridleway, a relatively flat route to the Park and Ride would be provided, avoiding the significant incline going up the main Oxford Road towards Lodge Hill.</p>	<p>Noted. The Council has safeguarded land for an upgraded footpath between Shippon and Abingdon-on-Thames in the Local Plan at the request of Oxfordshire County Council as the Highways Authority.</p> <p>Before any highway scheme is proposed or developed, this would be subject to a comprehensive feasibility and development process, including being subject to a comprehensive consultation process.</p>
Cllr Emily Smith	Liberal Democrat Group	Safeguarding for Upgraded Footpath	Following a number of serious accidents on the Wootton Road to the north of Abingdon, the County Council are looking at creating a cycle and pedestrian path from the Wootton Road Roundabout, along Wootton road into	Noted. The District Council is committed to continue to work with Oxfordshire County Council to plan positively for development and infrastructure. There will be opportunities for further

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>Wootton Village. This will enable children from Wotton, Sunningwell and Shippon to ride or walk more safely to school in Abingdon. This is much needed infrastructure that has the support of highways officers but will only happen if land can be identified. MM6 talks about an enhanced path from Shippon but no reference to beyond Shippon.</p> <p>We request that a strip of land for this purpose is safeguarded along Wootton Road as part of this plan.</p>	<p>enhancements to be considered through future Local Plan and Transport Plan processes.</p>
Richard Bahu		Safeguarding for Upgraded Footpath	<p>This existing footpath links Faringdon Rd, Shippon with Copenhagen Drive, Abingdon via a footbridge across the A34. It is very rarely used as in Abingdon it ends on the edge of a large housing estate, far removed from any amenities and the centre of Abingdon. It is not included or mentioned in the Transport Evidence Report</p>	<p>Noted. The Council has safeguarded land for an upgraded footpath between Shippon and Abingdon-on-Thames in the Local Plan at the request of Oxfordshire County Council as the Highways Authority.</p> <p>Before any highway scheme is proposed or developed, this would be subject to a comprehensive feasibility and development process, including being subject to a comprehensive consultation process.</p>
Susan Halliwell	Oxfordshire County Council	Safeguarding for Upgraded Footpath	<p>MM6 refers to safeguarding an upgraded footpath between Shippon and Abingdon-on-Thames. We requested this safeguarding and support the modification.</p>	<p>Noted and support welcomed.</p>
Cathy Harrison	Environment Agency	Support/ General Comment	<p>We support the proposed modification.</p>	<p>Noted and support welcomed.</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Janine Elliott		Transport Impact	Any new development does require infrastructure geared to a rapidly aging demographic. So, while cycle routes are great they are no good for the disabled, or elderly. We need small buses.	Noted. The Council is content that the policy, and particularly the Site Development Templates, provide sufficient guidance/ flexibility to inform future planning proposals. It is noted that Oxfordshire County Council have stated in their response to this consultation that they are confident that any impacts of development will be able to be mitigated.
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE)	Transport Impact	<p>The District Council and Oxfordshire County Council should reconsider the location of the A34 South Corridor Park and Ride and its integration with the allocation at Dalton Barracks.</p> <p>Concept of a Shuttle Bus Option in the Transport Delivery Report could affect the current City 4 bus route.</p>	Noted. This matter has been discussed in detail through the Examination process. The safeguarding has been proposed at the request of Oxfordshire County Council as Highways Authority. The Park and Ride scheme does not form part of the Main Modifications.
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE)	Transport Impact	Improved cycle links to Abingdon on existing roads, without segregation from other traffic, will not increase the proportion of trips by cycle.	Noted. The Council is content that the policy, and particularly the Site Development Templates, provide sufficient guidance/ flexibility to inform future planning proposals. It is noted that Oxfordshire County Council have stated in their response to this consultation that they are confident that any impacts of development will be able to be mitigated.

MM7: Core Policy 14a: Strategic Water Storage Reservoirs

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support / General Comment	MM7 updates text relating to the Thames Water Resources Management Plan and includes text that the reservoir safeguarding shall end if there is no prospect of the scheme being built. The amended text is supported.	Noted. Support welcomed.
Thames Water	Savills David Wilson	Support / General Comment	<p>Thames Water state that they 'wholly support the safeguarded area for the proposed Strategic Reservoir site between the settlements of Drayton, East Hanney and Steventon' and 'have no comment on the revised wording to Policy 14a which sets out that the safeguarding shall end if there is no prospect of the reservoir being built, for example if it is not included in the finalised Water Resource Management Plan 19 (WRMP19) or is refused Development Consent'.</p> <p>Thames Water's responses includes an update on their Water Resource Management Plan 2019, published in February 2018, in particular to state that a report was published in October 2018 called the 'Statement of Response' to consultation undertaken during the year.</p>	Noted. Support welcomed.
Adam Day	Gladman Developments	Objection	The response from Gladman makes clear that they maintain their objection to the proposed reservoir safeguarded area, which impinges on land at Hanney Road,	Response noted. The Council also notes that a Statement of Common Ground between VOWH, Thames Water and Gladman was published in July

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			Steventon, which has planning permission for residential development and which is now being built out. The representation makes reference to other land, such as an electricity substation and gas main, which Gladman maintain should be excluded from the safeguarded land.	2018 (SCG21) clearly setting out any areas of agreement and disagreement. It clearly stated that all parties were content that any areas of disagreement would be discussed through the Examination process for Hearing Matter 4 with no changes resulting from this discussion.
Cllr Emily Smith	Liberal Democrat Group	Objection	We would like to see the safeguarding of land south of Abingdon for a potential reservoir removed from the Plan. The County Council do not support the reservoir and while we welcome the modification to say this could be removed from the plan if the finalised Water Resources Management Plan 2019 does not include this site, or if development consent is refused, we are concerned this does not give residents in the Vale sufficient protection and would prefer this land was not safeguarded at this stage of the process.	Response noted.

MM8: Core Policy 15a: Additional Site Allocations for South-East Vale Sub-Area

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	<p>MM8 revises housing numbers in the South East Vale Sub-Area, deleting the allocation for 1,000 houses at Harwell Campus and stating that the allocation for 400 houses at North-West Grove will facilitate comprehensive masterplanning.</p> <p>The County Council notes that the Inspector has advised that the allocation at Harwell Campus should be deleted on the basis that it 'is not justified by the available evidence'. The County Council is not seeking to provide any other evidence, given that the District Council has accepted this (Cabinet 1st February and Council 13th February 2019) to enable the plan to progress. The County Council supports the reference to comprehensive masterplanning at Grove.</p>	Noted. Support welcomed.
David Wilson Homes (Southern)	Turley David Murray-Cox	Delivery at Grove	<p>This response refers to evidence presented to the Examination concerning housing delivery within the South East Vale Sub-Area, including raising concerns over the deliverability of the North West Grove site. Reference is made to the North Grove Link Road and concerns are reiterated about how this, and other infrastructure, will be delivered, in addition to the relationship with the adjoining site at Grove Airfield. Reference is made to County Council comments to the Planning Application for Grove Airfield. Housing Delivery is also linked to the</p>	<p>It is understood that this comment falls outside the scope of the Main Modifications consultation as it does not relate specifically to the Main Modification for Core Policy 15a. The matter referred to has been discussed in detail during the Examination process. The site is an 'additional' allocation, it is not expected to come forward until late in the plan period, it is allocated to facilitate masterplanning and planning for infrastructure. It is noted that Oxfordshire County Council support</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>Oxfordshire Housing and Growth Deal and whether under-delivery will threaten the commitments of Oxfordshire Authorities to delivery 100,000 homes up to 2031.</p> <p>Whilst DWS supports MM12 and the inclusion of additional land being safeguarded for the reopening of Grove Railway Station, the Main Modifications do not grapple with the issue of the deliverability of the existing allocations in LPP1 and the proposed allocations in LPP2.</p>	<p>both MM8 and MM10, which specifically refers to a 'Grove Comprehensive Development Framework'.</p>
John Richards	Dandara Ltd	Support/ Policy Wording	<p>This response sets out support for the deletion of the proposed housing allocation at Harwell Campus and for the reduced LPP2 allocation with the South-East Vale Sub-Area that is described as being 'sound'. It is suggested that footnote 'a' referring to LPP1 allocations is reduced to reflect commitments being added to the second sentence of the second paragraph under the heading 'Housing Delivery'.</p>	<p>Response noted.</p>

MM9: Core Policy 15b: Harwell Campus Comprehensive Development Framework

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cllr Emily Smith	Liberal Democrat Group	General Comment	The reasons for removing the allocating of 1000 homes from Harwell is not clear. This site is close to a major employment site - other council policies seem to support development here, so it needs to be made clearer why this site is no longer included in the allocation to help meet Oxford City's unmet need.	Noted. The Council understands that the Inspector's rationale for removing the Harwell Campus allocation will be set out within the Inspector's Final Report.
Susan Halliwell	Oxfordshire County Council	General Comment	MM9 deletes text relating to the allocation for 1,000 houses at Harwell Campus. A requirement for a comprehensive development framework at the Campus remains. We have no comment.	Noted.
Harwell Campus Partnership	Carter Jonas Steven Sensecall	General Comment	<p>Comments received to the modification to Core Policy 15b from Harwell Campus Partnership, including the following:</p> <ul style="list-style-type: none"> • reference to the importance of Harwell Campus to the local, regional and national economy. • Oxfordshire Local Enterprise Partnership's emerging Industrial Strategy was submitted to Government in December 2018, which recognises innovation assets at Harwell Campus • Partnership has suggested some additional wording to the modification to facilitate the delivery of housing for Campus related use if appropriate evidence is produced 	Noted. The Council understands that the Inspector's rationale for removing the Harwell Campus allocation will be set out within the Inspector's Final Report.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<ul style="list-style-type: none"> Partnership respects the Inspector's conclusion that the need for accommodation has not yet been justified, but the policy should provide a mechanism that allows housing to come forward. 	
Beata Ginn	Highways England	General Comment	Main Modification MM9: This is an amendment to the Policies Map and Figure 2.6 to reflect the deletion of proposed Harwell Campus housing allocation which was to the northwest of the A34 Chilton junction. Highways England notes this amendment which will remove the impact of future traffic generation from the Harwell Campus housing allocation from the A34 Chilton junction.	Noted.
L&Q and The Crown Estate	Turley Hannah Knowles	General Comment	<p>Alternative site promoted to the south of Harwell Campus through the Local Plan process.</p> <p>Site promoter is disappointed with the deletion of the Harwell Campus allocation from the Local Plan.</p>	Noted. The Council understands that the Inspector's rationale for removing the Harwell Campus allocation will be set out within the Inspector's Final Report.
Ptarmigan Land Ltd	Barton Willmore Robin Shepherd	General Comment	<p>Comments received to the modification to Core Policy 15b, including the following:</p> <ul style="list-style-type: none"> Concerns over the Council's changed approach to Harwell Campus and Science Vale Inspector's Letter dated 19 December 2019 provides limited explanation 	Noted. The Council understands that the Inspector's rationale for removing the Harwell Campus allocation will be set out within the Inspector's Final Report.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<ul style="list-style-type: none"> • Reference to insufficient evidence to support the Harwell Campus allocation is not justified • It is unclear how the housing need (quantum and particular needs of the Campus) is being re-provided elsewhere • Future of this area is likely to be subject to significant change and increased levels of development due to the wider economic strategy around science and knowledge economies and the proposal for an Oxford to Cambridge Expressway • Employees would need to live elsewhere leading to unsustainable travel patterns • Delivery of infrastructure key to the Campus's success would need to be funded from alternative means • Reference to Inspector's Interim Findings on the Vale of Aylesbury Local Plan 2013-2033 which required the Local Planning Authority to plan for predictable events, such as the Oxford to Cambridge Expressway. 	
Ken Dijkman		General Comment	<p>Objection to the deletion of 1,000 homes for the Harwell Campus allocation from Core Policy 15a which should be provided. Reference is made to an alternative site was promoted at Rowstock through the Local Plan process.</p>	Noted. The Council understands that the Inspector's rationale for removing the Harwell Campus allocation will be set out within the Inspector's Final Report.
NDA and Magnox Limited	Avison Young Matt Verlander	General Comment	Response welcomes Harwell Campus as a strategic employment site in the adopted Local Plan 2031 Part 1.	Response noted. The District Council has worked closely with the Harwell Campus Partnership. Whilst the District Council recognises that part of the

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			<p>It is considered the Plan does not provide sufficient context to the decommissioning process at Harwell Campus. Much of the decommissioning development may be considered to be 'Sui Generis' in planning terms and may generate employment opportunities and business activity.</p>	<p>campus is 'behind the wire' (i.e. the licensed site) and so not currently available for development, this area is well documented and does not form part of the land that is available for development within the plan period. It is anticipated that the licensed site will be available for development in the longer-term post 2031. This has been taken into account in the emerging SPD.</p> <p>There has and continues to be decommissioning activity on parts of the licensed site and economic development has and continues to be delivered at pace on the Campus land outwith the licensed area.</p>
John Richards	Dandara Ltd	Support	<p>Support received for modifications to Core Policy 15b to delete an allocation of 1,000 homes at Harwell Campus.</p> <p>Support received to the policy to recognise the value of delivering residential accommodation, ancillary to the main employment function of the Campus.</p>	Noted.
Helen Marshall	CPRE	Support	CPRE Oxfordshire supports the removal of this site from the Plan, which is entirely appropriate in terms of giving great weight to the conservation and enhancement of the	Noted.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			North Wessex Downs Area of Outstanding Natural Beauty.	
Liz Morris	Chilton Parish Council	Support.	Chilton Parish Council have viewed the proposed draft main modifications to Part 2 Local Plan and the only comment is that the Parish Council welcomes the deletion of the 1000 houses on the Harwell Campus and welcomes the recognition of the AONB.	Noted.

MM10: Grove Comprehensive Development Framework

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cllr Emily Smith	Liberal Democrat Group	Objection	We object to the addition of 400 homes in Grove as part of MM2. Wantage and Grove are already having to accept thousands of new homes and an additional 400 will add further to the problems of congestion, pressure on GP surgeries and other amenities. No major changes are planned to the rail or road network to accommodate this extra traffic – the roads out of Grove are single carriageway and all have constraints which impact on traffic flow. Grove station should be open before any more homes are built in this area. There are already traffic jams during rush hours especially in central Wantage and routes to the south and east. Residents are very fearful of the impact on this of approved houses yet to be built. The existing growth brings no extra employment	Noted. The North West Grove allocation is not added through the Main Modification, it was proposed in the plan as submitted. This matter was discussed in detail through the Examination process. The site is allocated to facilitate effective masterplanning for this part of Grove and to facilitate effective planning for infrastructure. It is noted that the proposed Comprehensive Development Framework approach is supported by Oxfordshire County Council.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			space, so all new residents will need to commute by road adding to the intolerable situation. If this site must be developed it should be for employment use.	
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM10 amends text relating to the North-West Grove allocation and requires a comprehensive development framework approach that will be adopted as a Supplementary Planning Document. The new text is supported, particularly as it refers to the need to consider infrastructure. In our evidence for the Matter 6 hearing on 4th September 2018, we set out our suggested text for Core Policy 5c and we are pleased to see that our requests have been largely taken on board. It may be noted that we requested that the text set out the full capacity of the site beyond 2031 and this aspect has not been followed – however it appears that the comprehensive development framework requirement will allow for that issue to also be resolved. If the Inspector considers that further amendments are required to the text, then we would ask that reference be made to our evidence. Overall, we support the amended text.	Noted. Support welcomed.
David Wilson Homes (Southern)	Turley David Murray-Cox	Delivery	<p>Objection received to this policy on the following grounds:</p> <ul style="list-style-type: none"> • significant concerns over the deliverability of the sites at Grove due to complications for the delivery of infrastructure e.g. GNLR 	Response noted. These matters were considered in detail through the Examination process. The site at North West Grove is not anticipated to come forward until late in the plan period and its allocation will facilitate master-

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<ul style="list-style-type: none"> • do not agree with the assertion that North West of Grove site will assist in delivering the GNLR • delivery of the GNLR is doubtful due to status of the Monks Farm application as the boundary does not include land required to connect GNLR to Denchworth Road • GNLR is required regardless of whether the North West of Grove site is allocated as Grove Airfield still requires connection to be made to the A338 	<p>planning and planning for infrastructure for north Grove. The approach is supported by Oxfordshire County Council who, in particular, support the Comprehensive Framework approach to development.</p>
Beata Ginn	Highways England	Support/ General Comment	<p>The Main Modification states that a SPD will be developed to support the delivery of Development of North West Grove. We are supportive of the intention to adopt a cumulative infrastructure requirements approach for Grove and seek further engagement with the site promoter/s and other interested parties to ensure that development in this location is sustainable in line with the principles of the NPPF. MM12 references future feasibility studies regarding the potential reopening of Grove rail station which would be of interest to us, we therefore request to be updated regarding its progress.</p>	<p>Noted. Support Welcome. The SPD will involve engagement with key stakeholders and will be subject to full public consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
Helen Marshall	CPRE	Evidence	<p>3. Grove allocation needs clearer justification (MM10, Core Policy 15a). We share the concerns of the Wantage & Grove Campaign Group that the North Grove Link Road has previously been committed to as part of the Grove Airfield development within the Vale of White Horse Local Plan</p>	<p>Noted. This matter has been discussed in detail through the Examination process. This policy ensures the proposed site allocation at North-West of Grove is appropriately masterplanned alongside the planning for Monks Farm and Grove Airfield sites and will assist in</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			2011. The identification of the need for an additional site to support this road therefore needs clearer justification.	the delivery of strategic infrastructure, including the North Grove Link Road (NGLR).
John Richards	Dandara Ltd	Support / General Comment	Dandara Ltd supports the insertion of Core Policy 15c relating to a 'Grove Comprehensive Development Framework' and particularly the recognition within the newly introduced text that 'it is important that the new development planned for Wantage and Grove delivers infrastructure (such as new services, facilities and roads) alongside the delivery of new housing'.	Noted. Support welcomed.

MM11: Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM11 provides for an additional scheme to be safeguarded – Cinder Track Cycle Improvements. We requested this safeguarding between Steventon and Milton Park and therefore support the modification.	Noted. Support welcomed.
Beata Ginn	Highways England	General comment	Highways England welcomes upgrades to existing walking and cycling facilities but requests that the local authority consults us at the earliest stage possible for any works in close proximity to or below the A34 so that we can advise and work closely with you.	Noted. The District Council is committed to working closely with key stakeholders including Highways England and welcomes the opportunity to work in partnership with both Highways England and Oxfordshire County Council, as Highways Authority on related matters.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Anthony BP Mockler		Objection	<p>This response objects to the principle of 'safeguarding' land. It states that as landowner for the North West Valley Park site (allocated within the Local Plan 2031 Part 1), in addition to owning land proposed to be safeguarded for a possible future upgrade of the Milton Interchange of the A34, that the North West Valley Park site will not be available for development until such time as the highway safeguarding is removed. However, the response does go on to state that a way forward would involve negotiation and talking things through.</p> <p>The response sets out a detailed objection to the proposed highway safeguarding on grounds related to and including congestion, pollution, noise and harm to a listed building.</p>	<p>The District Council has sought to safeguard land within the Local Plan, as requested and recommended by the Highways Authority. It is understood that safeguarding is designed to ensure that the potential for highways development is not prejudiced, where the Highways Authority consider that this is appropriate. However, before any highway scheme is proposed, or developed, they would be subject to a comprehensive feasibility and development process, including a comprehensive consultation process. The District Council is committed to working positively with the Landowner to assist with planning for development, including at the North West Valley Park site, and for infrastructure, at and around the settlement of Didcot. The District Council is content that there is sufficient flexibility within the South East Vale Sub-Area in the short term and welcomes the Landowner's commitment to continue to negotiate and talk these matters through. However, the site does not form part of the Part 2 plan.</p>

MM12: Core Policy 19a: Reopening of Grove Railway Station

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cathy Harrison	Environment Agency	Support/ General Comment	We support the proposed modification.	Noted. Support welcomed.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM12 provides for an additional area to be safeguarded as a possible alternative location for a new Grove Station. All options will be thoroughly considered and we therefore have no comment on this modification.	Noted. Support welcomed.
David Wilson Homes (Southern)	Turley David Murray-Cox	Support/ General Comment	This response sets out support for enlarging the area safeguarded for a possible future reopening of Grove Railway Station to include land to the east of the A338.	Noted. Support welcomed.

MM13: Core Policy 20a: Housing Supply for Western Vale Sub-Area

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM13 revises housing numbers in the Western Vale Sub-Area. The changes are not significant because there are no allocations in Local Plan Part 2 for this area. We therefore have no comment on this modification.	Noted.

MM14: Development Policy 1 - Self and Custom Build

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cllr Emily Smith	Liberal Democrat Group	Policy Wording	We welcome the inclusion of Self-Build in the Plan, however, the policy as modified does not go far enough. We think self-build plots should be a requirement rather on all sites over a certain size than something the council just encourages.	Noted. This matter was discussed during the Examination.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Summix (Chilton) Developments LLP	Frampton Town Planning Peter Frampton	Support/ General Comment	Support this modification to Development Policy 1 to reflect evidence on the Council's Self and Custom-Build Register.	Noted. Support welcomed.

MM15: Development Policy 2 - Space Standards

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Katie Gilbert	Thakeham	Objection	There is insufficient evidence to justify the application of national space standards and questions the viability of the policy.	Noted. This matter has been discussed in detail through the Examination process.

MM16: Development Policy 5 - Replacement Dwellings in the Open Countryside

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.

MM17: Development Policy 13e - Local Shopping Centres

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Beata Ginn	Highways England	General Comment	Main Modification MM17 and MM29: Appendix J: Map showing Local Shopping Centres that are to be retained (from the saved policies of the Local Plan 2011) and those centres that are proposed to be deleted. Highways England notes the amendments.	Noted.

MM18: Development Policy 19 - Lorries and Roadside Services

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Minscombe Properties Ltd	Ferax Planning Terry Gashe	Support/ General Comment	The proposed re-instatement of the allocation for Trunk Road Services is supported.	Support noted and welcomed.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Beata Ginn	Highways England	Support/ General Comment	Highways England noted a shortage of lorry parking and additional facilities or areas for HGV parking and the	Noted.

			reinstatement of Saved Policy TR10 is welcomed to retain the full extent of land safeguarded.	
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MM19: Development Policy 29 - Settlement Character and Gaps

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.

MM20: Watercourses

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Cathy Harrison	Environment Agency	Support/ General Comment	We support the proposed modifications.	Support noted and welcomed.
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Paul Coster		Support/ General Comment	General support for buffer zones around watercourses, but larger developments which incorporate SUDS should consider effects downstream of these sites. Developers should be	Core Policy 42: Flood Risk of the adopted Local Plan 2031 Part 1 requires developers to provide a drainage strategy as part of any application to consider run-off rates and reducing run-off rates for existing developed sites.

			required to enter a maintenance contract.	
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MM21: Development Policy 36 - Heritage Assets

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Martin Small	Historic England	Support/ General Comment	We welcome and support the proposed modifications to Development Policy 36: Heritage Assets and its supporting text, which reflect the discussions between Historic England and the Council.	Support noted and welcomed.
Helen Marshall	CPRE Oxfordshire	General Comment	<p>General support for main modifications to the heritage policies, but there still remains significant gaps, including:</p> <ul style="list-style-type: none"> - references to Registered Parks and Gardens in the supporting text should be presented in a policy - references to the Oxfordshire Historic Landscape Characterisation in the supporting text should be a clear policy commitment - no commitment to develop a Local Heritage Plan SPD which should be included as additional policy 	<p>The Council recognises Registered Parks and Gardens as heritage assets and consider such assets are sufficiently covered by Development Policy 36 in the Local Plan 2031 Part 2 and Core Policy 39: The Historic Environment in the adopted Local Plan 2031 Part 1.</p> <p>The Local Plan 2031 Part 1 includes a strategic policy, Core Policy 44: Landscape which ensures development proposals protect the important landscape settings, views and visually sensitive skylines.</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<ul style="list-style-type: none"> - omission of a Landscape and AONB policy - omission of a policy relating to the landscape setting of Oxford. 	<p>This policy is applied using up-to-date legislation and landscape studies including the Oxfordshire Historic Landscape Characterisation, Oxford View Cones Study and the Council's district-wide Landscape Character Assessment.</p> <p>The Council considers the North Wessex Downs Area of Outstanding Natural Beauty is sufficiently protected by Core Policy 44.</p>

MM22: Development Policy 38 - Listed Buildings

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.	Noted.
Martin Small	Historic England	Support/ General Comment	We welcome and support the proposed modifications to Development Policy 38: Listed Buildings, which reflect the discussions between Historic England and the Council.	Support noted and welcomed.

MM23: Development Policy 39 - Archaeology and Scheduled Monuments

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM23 relates to a development policy on archaeology. We support the improved text.	Support noted and welcomed.
Arnold White Estates	Gardner Planning Geoff Gardner	Support/ General Comment	The modifications to Development Policy 39 are supported with the additional and higher qualifications included: Development proposals that would lead to SUBSTANTIAL harm or TOTAL loss of significance of such remains will only be permitted in exceptional circumstances ...	Support noted and welcomed.
Martin Small	Historic England	Policy wording	MM23: This proposed modification does not accurately reflect paragraph 194 of the National Planning Policy Framework which states that: “Any harm to, or loss of, the significance of a designated heritage asset.....should require clear and convincing justification” and “Substantial harm to or loss of assets of the highest significance, notably scheduled monuments....., should be wholly exceptional” (our emphasis). Also paragraph 133 is paragraph 195 of the revised Framework.	Noted. This matter has been discussed in detail through the Examination process. The Council has worked positively and collaboratively with Historic England in the preparation of this policy in the Local Plan. The Council welcomes Historic England's suggested wording to this policy and has no objection to a slight amendment to the policy should the Inspector consider that this is helpful.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>We therefore suggest that the modification should be: “Nationally...in situ. Development proposals that would lead to harm of the significance of such remains will only be permitted where it is clearly and convincingly demonstrated that the harm or loss is necessary to achieve public benefits that outweigh that harm or loss. Where that harm would be substantial or there would be total loss of significance proposals will only be permitted where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or all of the circumstances in paragraph 195 of the NPPF apply.”</p>	

MM24: Appendix A - Site Development Templates, General Requirements

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM24 provides for a Health Impact Assessment requirement. We support this modification.	Support noted and welcomed.

MM25: Appendix A - Site Development Template, Harwell Campus

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	General Comment	MM25 to MM26 are consequential amendments.	Noted.

MM26: Appendix A - Site Development Templates, Utilities

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	General Comment	MM25 to MM26 are consequential amendments.	Noted
Thames Water	Savills David Wilson	Support/ General Comment	Thames Water support MM26. The proposed amendment wholly reflects the comments made within our representations in November 2017.	Noted. Support welcomed.

MM27: Appendix A - Site Development Templates, Dalton Barracks

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Richard Bahu		General Comment	Infrastructure delivery is the number one concern of residents both existing and those who move to any new development and is increasingly seen as a priority in scheduling the delivery of dwellings.	<p>Noted. The Site Development Template for the allocation at Dalton Barracks includes a number of site specific infrastructure requirements including education provision, highways and community services and facilities.</p> <p>The Local Plan 2031 Part 2 is also supported by an Infrastructure Delivery Plan.</p>
Beata Ginn	Highways England	General Comment	This amendment to Appendix is to reflect the reduced allocation of 1,200 dwellings at Dalton Barracks. As per our previous comments Highways England notes this amendment which will reduce the impact of future traffic generation from this site on the A34 and its junctions.	Noted.
Richard Bahu		Policy Wording	First mention of a "Supplementary Planning Document" rather than "masterplanning" - what is the difference?	A Supplementary Planning Document adds further detail to Core Policy 8b in the Local Plan 2031 Part 2 and is a material consideration in planning decisions. This policy ensures a comprehensive approach to masterplanning of the allocation at Dalton Barracks, which will be published as a Supplementary Planning Document (SPD). The SPD will be subject to full public consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Paul Butt	Paul Butt Planning Ltd	Policy Wording	The Site Development Templates for the allocated sites at Dalton Barracks and Kingston Bagpuize with Southmoor should include an additional requirement to ensure the occupation of dwellings on the site will not begin prior to the completion of the Marcham Bypass unless an alternative phasing plan is agreed with the County and District Councils.	Noted. This matter is discussed further within the Council's response to comments received relating to the Air Quality Evidence.
Paul Butt	Paul Butt Planning Ltd	Policy Wording	The Site Development Templates for the allocated site at Dalton Barracks should include an additional requirement to ensure the occupation of dwellings on the site will not begin prior to the completion of the Marcham ByPass unless an alternative phasing plan is agreed with the County and District Councils.	Noted. This matter is discussed further within the Council's response to comments received relating to the Air Quality Evidence.
Susan Halliwell	Oxfordshire County Council	Support/ General Comments	Housing Trajectory An amendment to the housing trajectory was provided to the Inspector in August 2018 setting out that initial completions for the East of Kingston Bagpuize site would be in 2024/25. This followed an earlier update in February 2018 setting out that initial completions for the Dalton Barracks site would also be in 2024/25. These detailed housing trajectories do not appear in the Local	Support noted and welcomed.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			Plan itself. We support these latest housing trajectories, which reflect the requirement in the modifications (MM27 and MM28) for no occupations prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council.	
Susan Halliwell	Oxfordshire County Council	Support/ General Comments	MM27 amends the site development template for Dalton Barracks. We generally support this modification, particularly the text relating to comprehensive masterplanning and the requirement that the occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council. A consequence of the reduced allocation size is that a secondary school is no longer proposed on the site. Text is therefore amended to refer instead to seeking contributions for 'appropriate secondary school provision for the area in Abingdon-on-Thames'. We cannot at this stage guarantee that the appropriate location for additional secondary school provision will be Abingdon-on-Thames,	Support noted and welcomed.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			although the suggestion is logical and therefore we do not object to this text.	

MM28: Appendix A - Site Development Templates, East of Kingston Bagpuize with Southmoor (within Fyfield and Tubney Parish)

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Stephen Fraser	Fyfield and Tubney Parish Council	Community Infrastructure	Fyfield and Tubney Parish Council commented that this modification should remove the words 'subject to viability'.	This proposed modification provides sufficient flexibility when deciding on planning applications for development, consistent with national policy.
		Planning Application	Fyfield and Tubney Parish Council referenced some comments and objections to planning application P18/V2791/O including from Oxfordshire County Council, Oxfordshire Clinical Commissioning Group, Thames Water, Historic England and the Council's Environmental Health Officer.	Noted. Planning Applications are separate to the Local Plan process. Comments relating to an application provide a point in time but do not indicate the end point of a process. It is noted that the County Council's response to this consultation confirms their confidence that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated.
		Policy Wording	Fyfield and Tubney Parish Council raised the following objections: <ul style="list-style-type: none"> • Presented evidence at Examination that the cumulative impact of traffic from site allocations, including this site, would be severe • Additional traffic through Marcham from the site allocations would have an adverse impact on the Marcham 	This matter is discussed further within the Council's response to comments received relating to the Air Quality Evidence and for the Additional Transport Evidence.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			AQMA • Opinions supported by the traffic and air quality assessments to accompany planning application P18/V2791/O.	
		Policy Wording	Fyfield and Tubney Parish Council raised the following objections: • Additional requirements to 'access and highways' in the Site Development Template are too flexible and unambiguous • Problems associated with increased traffic through Marcham village have not been addressed • Marcham Bypass should be incorporated into the Local Plan; no point upgrading Frilford Junction without a Marcham By-pass	The District Council is content the policy wording is sufficiently robust and has been discussed in detail through the Examination process. It is noted that the County Council's response to this consultation confirms their confidence that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated.
		Policy Wording	Fyfield and Tubney Parish Council suggested the following main modifications to the Plan: • No occupation of houses prior to the upgrade of the Frilford Junction • No occupation of houses prior to the completion of a Marcham by-pass • A restriction on the size of the development to no more than 600 dwellings • Provide a local centre with funding from the developer secured by a bond or similar	The District Council is content the policy wording is sufficiently robust and has been discussed in detail through the Examination process. It is noted that the County Council's response to this consultation confirms their confidence that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Paul Butt	Paul Butt Planning Ltd	Policy Wording	Site Development Template for allocated sites at Dalton Barracks and Kingston Bagpuize with Southmoor should include an additional requirement to ensure the occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council.	Noted. The Main Modification wording has been agreed by Oxfordshire County Council as Highways Authority. It is noted that the County Council's response to this consultation confirms their confidence that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated.
Helen Marshall	CPRE	Policy Wording	<p>Supports concerns raised by Fyfield and Tubney Parish Council and FLAG.</p> <p>Comment considers there are outstanding issues regarding traffic through Marcham village which have not been addressed and will impact on AQMA.</p> <p>Suggested wording for the modification to the Site Development Template relating to completion of the upgrade to Frilford Junction.</p>	This matter is discussed further within the Council's response to comments received relating to the Air Quality Evidence.
Stephen Fraser	Fyfield and Tubney Parish Council	Size of Development	Fyfield and Tubney Parish Council commented that current planning application (P18/V2791/O) is for 700 dwellings plus 70 extra care housing.	Noted. The District Council is content the policy provides sufficient flexibility. It is for the Development Management process to consider if proposals are consistent with the policies of the Development Plan taken together.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Size of Development	Support for the latest housing trajectories, which reflect the requirement in the modifications (MM27 and MM28) for no occupations prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council.	Support noted and welcomed.
		Support/ General Comment	MM28 amends the site development template for East of Kingston Bagpuize with Southmoor (within Fyfield and Tubney Parish). As with Dalton Barracks, we support this modification, particularly the text requirement relating to Frilford Junction. We also support the requirement for a new local centre adjacent to the proposed primary school.	Support noted and welcomed.
John Richards	Dandara Ltd	Support/ General Comment	Supportive of the inclusion for a restriction on development of the site until the completion of upgrades to Frilford Junction.	Support noted and welcomed.
Lioncourt Strategic	Savills Roger Smith	Support/ General Comment	Support from the site promoter to the modification to the Site Development Template for East of Kingston Bagpuize with Southmoor allocation.	Support noted and welcomed.
Sean Quiggin		General Comment	This comment suggests that there is an absence of the risks associated	Noted. The Main Modification wording relating to 'Access and Highways' has been

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>with additional traffic movements on the junction of the A420/Charney Bassett. Additional mitigation measures were suggested including reducing the speed limit along the A420 as it passes the site allocation, Frilford and Tubney.</p> <p>The comment also suggests that there is an omission of improvements to non-vehicular transport, for example, cycling to Abingdon and Oxford.</p> <p>Finally, this response suggested that the policy does not sufficiently safeguard for existing matures trees to enhance biodiversity and the landscape.</p>	<p>agreed by Oxfordshire County Council as Highways Authority.</p> <p>The District Council is satisfied that the requirements set out in the Site Development Template provides sufficient guidance to support the delivery of high quality and sustainable development. It is understood that the requirements relating to 'Landscape Considerations' and 'Biodiversity' do not form part of the Main Modifications.</p>

MM29

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Support/ General Comment	MM29 is an appendix showing local shopping centres which the County Council has no comment on.	Noted.
Beata Ginn	Highways England	Support/ General Comment	Main Modification MM17 and MM29: Appendix J: Map showing Local Shopping Centres that are to be retained (from the saved policies of	Noted.

			the Local Plan 2011) and those centres that are proposed to be deleted. Highways England notes the amendments.	
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Miscellaneous

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Bloor Homes	Gillings Planning Daniel Wiseman	Alternative Site	A representation was received from a developer promoting an alternative site. A detailed narrative is provided for the developers interests in taking this site forward.	Noted.
David Wilson Homes (Southern)	Turley David Murray-Cox	Alternative Site	A response was received from an agent promoting an alternative site to the east of the A338 at Grove. Detailed information is provided setting out the merits of the site. It is stated that there is no evidence provided for why the Main Modifications are required.	Noted.
Sarah Redston Anthony BP Mockler Mr Philip		Consultation Process	Three comments were received relating to what is described as the overwhelming level of information that forms the consultation. One response described what they consider is a great flaw in the system in that ordinary people feel that their comments are ignored, and no response is given to their arguments. One response suggests that despite VOWH officers being invited to attend	Comments noted. Whilst the District Council works hard to make information available in an accessible form, the Local Plan is ultimately a technical document that will be used to inform decisions on development proposals and is required to be consistent with national Government policy, guidance and legislation. Throughout the preparation of the Local Plan, the District Council has undertaken a series of consultation processes. All

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>Neighbourhood Plan Steering Group meetings, that officers only attended the first meeting. It is suggested that officers offered support and provided none. The response goes on to describe what they consider is a mismanagement of the planning process.</p>	<p>responses received are given careful consideration and detailed reports are available on the Council website summarising these responses. Any comments on the Main Modifications consultation will be considered by the Planning Inspector. This summary table has been prepared by the Council in an effort to assist the process.</p> <p>In terms of the Wootton and St Helen Without Neighbourhood Plan, the Council has provided significant support, officers have attended a large number of meetings, within the community and with community representatives at the Council offices. A series of workshops have been undertaken to discuss masterplanning for the proposed development site and to assist the preparation of the Neighbourhood Plan.</p>
Janet Banfield	Wootton and St Helen Without Neighbourhood Plan Steering Group	Consultation Process	<p>A response was received that describes what is considered to be a 'democratic deficit'. The response describes concerns for the Council's submission to Government for 'Garden Community' status to be applied to the proposed development at Dalton Barracks. The response describes what they consider to be a lack of engagement, misrepresentation and exclusion. The response does state that the Neighbourhood Plan group has</p>	<p>Throughout the preparation of the Local Plan, the District Council has undertaken a series of consultation processes. All responses received are given careful consideration and detailed reports are available on the Council website summarising these responses. Any comments on the Main Modifications consultation will be considered by the Planning Inspector. This summary table has been prepared by the Council in an effort to assist the process.</p> <p>In terms of the Wootton and St Helen</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			<p>engaged constructively with the VOWH at every stage in the Local Plan and Neighbourhood Plan process and that they have requested very little by way of concession. It is stated that the wishes of the Neighbourhood Plan group and community have been repeatedly ignored.</p>	<p>Without Neighbourhood Plan, the Council has provided significant support, officers have attended a large number of meetings, within the community and with community representatives at the Council offices. A series of workshops have been undertaken to discuss master-planning for the proposed development site and to assist the preparation of the Neighbourhood Plan. The District Council of course wishes to give consideration to the concerns of local residents, however the District Council must also give consideration to the views and wishes of Town and Parish Councils and individuals across the district and to a wide range of stakeholders and to a wide range of technical details. The preparation of a Local Plan may involve some balancing of different views and factors.</p> <p>It is understood that the most significant concern of local residents is the need for a strategic gap between the existing village of Shippon and the proposed development at Dalton Barracks. This matter is discussed further in relation to Main Modification 4.</p>
Helen Marshall	CPRE Oxfordshire	DP21	<p>A response was received relating to Development Policy 21, which does not form part of the Main Modifications consultation. The full response has been forwarded to the Planning Inspector for information.</p>	<p>Response noted.</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Jane Hennell	The Canal & River Trust	General Comment - Canal and River Trust	A response was received from the Canal and River Trust that states that the trust has no comments to make.	Noted.
	Forestry Commission	General Comment - Forestry Commission	A response was received from the Forestry Commission who state that they are not in a position to input into the Local Plan consultation process.	Noted.
Beata Ginn	Highways England	General Comment - Highways England	A response was received from Highways England that describes the role of Highways England, particularly in relation to the Strategic Road Network (SRN), and their approach to working with a local planning authority.	Noted.
Rebecca Micklem	Natural England	General Comment – Natural England	Having reviewed the main modifications and the accompanying Habitat Regulations Assessment Statement, we can confirm that we have no comments to make on the main modifications.	Noted.
Chris Gaskell	Scottish & Southern Electricity Networks	General Comment - Scottish and Southern Electricity Networks	A response was received from Scottish and Southern Electricity Networks that states that they have no further comments.	Noted.
Paul Belcher		General Comment - SODC	A response was received that is thought to relate to the South Oxfordshire Local Plan. It makes reference to a new settlement and traffic flows in South Oxfordshire.	No comment.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Beata Ginn	Highways England	HRA - Highways England	Highways England state that they have no comments on the HRA relating to the Main Modifications Consultation.	Noted.
Guy Langton	East Hanney Parish Council	Objection to Development at East Hanney	A detailed response was received setting out an objection to development at East Hanney.	This matter was discussed in detail through the Examination process. It is understood that the response does not relate to the Main Modifications consultation.
Beata Ginn	Highways England	SA - Highways England	Highways England provided a narrative on the SA for the Main Modifications consultation.	Noted.
Sophie Jamieson		Support/ No Comment	Comment states 'generally support the redevelopment of the Dalton Barracks site for housing, even though I live on the northern fringe of the proposed development'.	Noted.
Cllr Roger Cox		Support/ No Comment	Comment states 'I am content that these documents provide an accurate and sustainable approach to delivering Local Plan Part 2'.	Noted.
Susan Halliwell	Oxfordshire County Council	Support/ No Comment - County Council	Oxfordshire County Council largely supports the Vale of White Horse Local Plan Part 2 (LPP2) as proposed to be modified. In many cases the proposed modifications address matters which we raised in our comments of November 2017 and hearing statements of June 2018.	Noted.
Spencer Jefferies	National Grid	Support/ No Comment - National Grid	National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We have reviewed the above	Noted.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
			consultation document and can confirm that National Grid has no comments to make in response to this consultation	

Miscellaneous – Additional Air Quality Evidence

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Stephen Fraser	Fyfield and Tubney Parish Council	Air Quality Evidence	See below.	See below.
<p>This response makes reference to the traffic and air quality assessments accompanying the planning application by Lioncourt Strategic Land, P18/V2791/O, for development of the Land East of Kingston Bagpuize site submitted to VoWH DC in November 2018, which is described as extremely pertinent.</p> <p>It is stated that the traffic assessment predicts a substantially greater flow of traffic through Marcham than our (FLAG) estimates suggested. It is stated that as the planning application was submitted by the developers of the site, the traffic and air quality assessments are independent of any bias that the group may have.</p> <p>Please note that this response also included an attachment that is available to view on the Council website.</p> <p>OFFICER RESPONSE</p> <p>The District Council is satisfied that the proposed Main Modification relating to the upgrade to Frilford Junction (Main Modification 28) is satisfactory and note that the County Council's response to this consultation confirms their support of this modification 'particularly the text relating to Frilford Junction'.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
<p>It is agreed that the delivery of Marcham Bypass would be expected to fully mitigate any air quality impacts associated with the Marcham AQMA. However, as has been made clear in the response to this consultation from the County Council, there are other approaches that should also be investigated in addition to a bypass, and that the County Council is committed to undertake this detailed investigation.</p> <p>Whilst, the District Council considers that DP26 already provides sufficient guidance to inform a planning application, if the Inspector considers that a further Modification is necessary, this could refer to occupation of dwellings on the site not beginning prior to a satisfactory air quality mitigation strategy being in place as agreed by the District and County Councils.</p> <p>In terms of the scale of development, the Council is satisfied that the policy provides sufficient guidance, whilst also providing for flexibility, as required by national policy, including Paragraph 157 (2012 NPPF).</p> <p>In relation to the Site Development Template wording for social and community infrastructure, the Council is satisfied this is satisfactory and crucially, is consistent with national policy, including Paragraph 173 (2012 NPPF).</p> <p>The determination of a Planning Application, similar to a Local Plan process, is iterative. The comments provided in the response from Paul Butt Associates relating to the Kingston Bagpuize allocation give a snap shot in time, but do not provide a conclusion from a process that is currently incomplete. More detailed work, for example by the County Council, will be undertaken to investigate the various alternative ways of addressing traffic at the relevant locations will be investigated alongside investigations into the Frilford Junction improvements which are identified in relation to Main Modifications 27 and 28, as referenced in the County Council's response to this consultation.</p> <p>The determination of a Planning Application is separate to a Local Plan Examination process. The relevant NPPF test for the purposes of the Local Plan Examination in relation to this proposed allocation is Footnote 12 to Paragraph 47 (2012 NPPF):</p> <p>"To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged".</p> <p>Main Modification 27 ensures that development will not come forward before 2024/25. The Council maintains that there are reasonable prospects that the site can come forward at this point or later in the plan period. The County Council's response to this consultation has confirmed that they are 'confident' that the effects of development will be able to be mitigated.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Paul Butt	Paul Butt Planning Ltd	Air Quality Evidence	See below	See below

This submission provides a detailed response to the Air Quality Evidence and includes reference to officer comments obtained through a FOI (Freedom of Information) request. The response has been provided to the Inspector (along with all other responses) in full and is available to view on the Council's website. The comment includes:

- It is questioned whether LPP2 has taken appropriate account of air quality. It is suggested that the overall pattern of development set out in LPP2 should be changed, principally by removing the Kingston Bagpuize with Southmoor allocation and the Dalton Barracks allocation.
- It is suggested that occupation of dwellings should not commence prior to the completion of the Marcham Bypass in the same way that MM27 and MM28 do not allow the occupation of dwellings at Kingston Bagpuize with Southmoor and Dalton Barracks prior to the completion of the upgrade to Frilford Junction.
- It is stated that planning policies should comply with AQMA requirements and that the links between poor air quality and health are well established.
- Detailed reference is made to the Council's SA Report and Monitoring Framework.
- Reference is made to the section of the report that discusses Marcham Bypass, for example, that this 'would fundamentally alter the current road network' and that 'VOWH consider that the construction of Marcham Bypass would be expected to fully address any potential impacts associated with the Marcham AQMA'. Reference is made to MM27 and MM28 that restrict occupation of dwellings linked to the upgrade of Frilford Junction, but does not make reference to Marcham Bypass.
- Concern is raised over the exclusion of the North Grove Site, nor consideration for LPP1 sites that are already allocated and consented.
- Reference is made to information obtained through a Freedom of Information request. This includes comments from Environmental Health Officers within the Council commenting on early drafts and iterations of the evidence.
 - "With regard to Marcham, additional traffic will further add to congestion and to the air quality burden and maintain the need for an AQMA. In terms of mitigation, the only feasible option appears to be a by-pass to take traffic away from the properties vulnerable to traffic related air pollution".
 - "The infrastructure mitigation (bypass, etc) needs to be made clearer at emphasising the positive impacts on local AQ"; and that it "should state that there shall be an increase in nitrogen dioxide that shall have an adverse impact, even if they are defined as 'negligible' under the guidance"; and that "I don't want this document to weaken any case for such measures."
 - "The Environmental Protection Team would strongly support the building of a bypass road around Marcham which takes traffic away from the declared Air Quality Management Area in the village. Such a measure would also meet one of the key actions specified in the council's Air Quality Action Plan (AQAP) formally adopted in 2015 to address poor local air quality in Marcham."

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
<ul style="list-style-type: none"> • It is stated within the response that within the FOI information, there is no sign-off from the Council’s Environmental Protection Team Leader for the final version of the Report. • The response includes comments from the Council’s Environmental Health Officer that states, for example: <ul style="list-style-type: none"> ○ “this report looks like a rushed job and makes overly positive assumptions in assessing a ‘negligible’ impact on air quality in Marcham and elsewhere”. ○ “that is a lot more traffic to squeeze through the pinch point in Marcham and it is hardly credible that this will not have a negative impact on air quality. Unless there is a massive improvement in traffic emissions; this additional traffic will neither be able to sustain nor improve the air quality situation in the AQMA. The only way to significantly improve the local air quality in Marcham is to provide an alternative route for existing and additional traffic; away from the village; which would take the form of a by-pass”. • The response suggests that it is not appropriate for the Council to rely on a report where concerns have been raised by Council Environmental Health Officers. • Reference is made to a planning application P18/V2791/O for the Kingston Bagpuize with Southmoor site which has yet to be decided by the Council. It is stated that the evidence supporting the application identifies air quality impacts and that the Council’s Environmental Health Officer has put in a holding objection on air quality grounds. • It is also stated that Oxfordshire County Council has objected to the planning application. The OCC comments are set out in full. • The response sets out a detailed list of actions that the respondent considers the Council should advise the Inspector. These include that MM27 and MM28 should also refer to Marcham Bypass in addition to an upgrade to Frilford Junction. 				
<p>OFFICER RESPONSE</p>				
<p>The District Council considers that DP26: Air Quality, alongside national policy, provides a sufficiently robust policy framework for considering air quality impacts in relation to any development proposals.</p>				
<p>The District Council does not consider that there is any justification for revisiting the entire site selection process, or proposed allocations, which have been subject to detailed scrutiny through examination and are the product of a comprehensive process assessing several hundred sites and being subject to several stages of consultation.</p>				
<p>The District Council is content with the process its officers have undertaken to prepare the evidence document in question. In relation to the FOI information, it should of course be noted that in addition to using email correspondence, officers also hold discussions in the office and</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
<p>by telephone and so parts of any discussion on these matters may not appear in an email record. It is also the case that the preparation of any documentation is iterative, and comments presented from an FOI may not provide a clear picture of the end point of a process for the reasons explained above.</p> <p>The District Council can confirm that the Environmental Protection Team Leader did confirm his acceptance of the report and letter (PC03.4 30 November 2018) before it was finalised and published.</p> <p>It is agreed that the delivery of Marcham Bypass would be expected to fully mitigate any air quality impacts associated with the Marcham AQMA. As has been made clear in the response to this consultation from the County Council, there are other approaches that should also be investigated in addition to a bypass, and that the County Council is committed to undertake this detailed investigation.</p> <p>Whilst the AQAP states that delivery of the Marcham Bypass is unlikely to be funded without significant development in the area, there are sources of funding available to fund infrastructure. The District Council notes that of the 17 highway schemes listed in Core Policy 17 within the Part 1 Local Plan, five of these schemes have been delivered and nine more are now funded with delivery expected within the next five years. The majority of these schemes were not funded or delivered at the time of the Part 1 plan examination.</p> <p>The District Council does not consider that specific reference to delivering Marcham Bypass prior to occupation at the Kingston Bagpuize or Dalton Barracks allocations is necessary. This is because it is not yet known if alternative ways of addressing any potential impact may be satisfactory. The County Council response to this consultation makes it clear that they are committed to undertake detailed investigations as part of preparing feasibility studies for Frilford Junction and Marcham Bypass and that this will include alternative ways of addressing any impact. The District Council understands that this work will be completed during the next one to two years. The District Council note that the County Council state that they are confident that the effects of development will be able to be mitigated. It has already been established that development will not commence on the Kingston Bagpuize and Dalton Barracks sites prior to 2024/25.</p> <p>Whilst, the District Council considers that DP26 already provides sufficient guidance to inform a planning application, if the Inspector considers that a further Modification is necessary, this could refer to occupation of dwellings on the Kingston Bagpuize and Dalton Barracks allocations not beginning prior to a satisfactory air quality mitigation strategy being in place as agreed by the District and County Councils.</p> <p>The District Council considers that the Local Plan evidence, which is in accordance to national policy is 'proportionate' (2012 NPPF Para 182), and the applicant would be expected to supplement more detailed evidence at a planning application stage. Planning Applications would need to demonstrate conformity with the policy framework provided by the Development Plan taken as a whole, along with national policy. As has been established by the County Council's response to this consultation, the County Council is committed to undertake detailed</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
<p>investigations into the various alternative was of addressing traffic at the relevant locations at the same time as investigations into the Frilford Junction improvements which are identified in relation to Main Modifications 27 and 28. Furthermore, that the County Council is confident that effects of development can be mitigated.</p> <p>The District Council is satisfied that the SA and Monitoring Framework are soundly based and have been discussed in detail through the examination process.</p> <p>The District Council does not consider that air quality impacts of development at North West Grove are applicable at the present time, given that development is not expected to come forward until the end of the plan period. Clearly the parameters for such a test would change substantially before the development comes forward. In any case, DP26 provides a sufficiently robust policy approach to ensure impacts are properly considered at the time a Planning Application is considered. The rationale and justification for allocating the North West Grove site is to facilitate more detailed planning for long-term infrastructure delivery in north Grove and includes a commitment for the Council to prepare an 'Comprehensive Masterplan Framework SPD' at the request of Oxfordshire County Council (MM10).</p> <p>The determination of a Planning Application, similar to a Local Plan process, is iterative. The comments provided in the response from Paul Butt Associates relating to the Kingston Bagpuize allocation give a snap shot in time, but do not provide a conclusion from a process that is currently incomplete. More detailed work, for example by the County Council, will be undertaken to investigate the various alternative ways of addressing traffic at the relevant locations will be investigated alongside investigations into the Frilford Junction improvements which are identified in relation to Main Modifications 27 and 28, as referenced in the County Council's response to this consultation.</p> <p>The determination of a Planning Application is separate to a Local Plan Examination process. The relevant NPPF test for the purposes of the Local Plan Examination in relation to this proposed allocation is Footnote 12 to Paragraph 47 (2012 NPPF):</p> <p>"To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged".</p> <p>Main Modification 27 ensures that development will not come forward before 2024/25. The Council maintains that there are reasonable prospects that the site can come forward at this point or later in the plan period. The County Council's response to this consultation has confirmed that they are 'confident' that the effects of development will be able to be mitigated.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Beata Ginn	Highways England	Air Quality Evidence	See below	See below
<p>This response provides a narrative on the air quality evidence, particularly where it makes reference to planned infrastructure upgrades to the Lodge Hill A34 Interchange. The report states at Section 3.3.3:</p> <p>“It should also be noted that the future construction of the upgrade to the Lodge Hill A34 Interchange at Abingdon, which is now fully funded and expected to be completed before the end of 2021, i.e. prior to the commencement of the larger LPP2 sites. This junction upgrade is expected to improve traffic flows through Abingdon, as clearly there will be an increase in route options, thus helping to reduce the reliance on Marcham Interchange.”</p> <p>Highways England states that they will continue to work closely with Oxfordshire County Council and partners to establish the deliverability of and to inform the business case to improve the A34 Lodge Hill Junction to provide south facing slips. Highways England states that whilst they have no objection in principle to the proposal, it needs to be demonstrated there would not be a detrimental impact to the safe and efficient operation of the A34 from an improved junction.</p> <p>OFFICER RESPONSE</p> <p>Response noted. The District Council will continue to work positively with and support Highways England and Oxfordshire County Council as Local Highways Authority.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Susan Halliwell	Oxfordshire County Council	Air Quality Evidence	See below	
<p data-bbox="203 371 472 400">Air Quality Evidence</p> <p data-bbox="203 437 1924 501">4. The County Council is concerned about the effects of development on air quality. The Air Quality Management Areas in the report: Marcham, Abingdon and Botley, are of particular concern.</p> <p data-bbox="203 537 2029 772">5. The traffic flows on which the assessment in the Additional Air Quality Evidence has been based were not agreed with Oxfordshire County Council prior to the production of the report. Although it is acknowledged that some initial distribution parameters were agreed with county council officers for the purposes of the provision of the aforementioned Transport Delivery Report, the assignment of this distribution onto the surrounding network was not agreed. Therefore, the County Council is unable to comment on the acceptability of the assignment exercise undertaken by Glanville and consequently the AADT data provided by Glanville as referred to on page 1 of the Executive Summary and shown in Table 2.3 on page 9 (Marcham AQMA), Table 3.4 on page 16 (Abingdon AQMA), and Table 4.3 on page 21 (Botley AQMA) of the report produced by SLR.</p> <p data-bbox="203 809 2029 1011">6. Further to this, the report states that estimated traffic flow data for some of the allocated housing sites utilised in the assessment described above is taken from the RPS report that was appended to the Note for Inspector re: Cumulative Impact of Air Quality (22 August 2018). The RPS report states that this traffic flow data was provided by Vale of White Horse District Council. The estimated daily traffic flows through the Marcham AQMA are provided in Table 1.2 of the document. Although county council officers are unaware as to how this information was derived, we trust that this information will have been based on the best information available at the time. However, as a result, the County Council is unable to come to an informed view on the findings of either of the air quality assessments.</p> <p data-bbox="203 1048 2029 1214">7. The County Council will insist, in line with the requirements outlined in Development Policy 26: Air Quality in the draft Local Plan, that any subsequent planning applications are supported by appropriate air quality impact modelling assessments based upon the increased and cumulative traffic volumes (to be agreed with the County Council) and, that both County and District councils will adhere to their own policy along with national policy and legislation in relation to development transport impacts upon the existing AQMAs. It is noted that this accords with the Executive Summary of the SLR report, in which it states:</p> <p data-bbox="203 1251 1995 1315">v. Potential air quality impacts will also be considered in detail at the planning application stage in accordance with Development Policy 26 and national guidance. DP26 provides a comprehensive framework for considering air quality impacts.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
<p>8. Page 11 of the Air Quality Evidence notes that a Marcham Bypass would fundamentally alter the current road network. Safeguarding for a Marcham Bypass is included in LPP2 (Appendix B – no modifications). We stated in our evidence in June 2018 that: ‘the proposal to safeguard land for a Marcham by pass is justified, it being necessary to ensure that alternative ways of addressing traffic in this location are not compromised given increasing levels of traffic, and the need to improve air quality (as stated in our Regulation 19 response paragraphs 57 to 59)’. The various alternative ways of addressing traffic in this location will be investigated at the same time as investigations into the Frilford Junction improvements which are identified in the modifications as being necessary prior to development at Dalton Barracks and Kingston Bagpuize (MM27 and MM28). At this stage, no commitment to constructing a Marcham Bypass has been made, but we are confident that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated through appropriate schemes resulting from the investigative work.</p> <p>OFFICER RESPONSE</p> <p>The Vale of White Horse District Council shares the County Council’s concern about the effects of development on Air Quality. Whilst the District Council note the County Council’s comment that it feels it is unable to come to an informed view on the findings of the air quality assessments, the District Council also welcomes the County Council’s commitments to undertake investigations into the various alternative ways of addressing traffic at the relevant locations and that these investigations will be carried out at the same time as investigations into the Frilford Junction improvements which are identified in relation to Main Modifications 27 and 28. The District Council understands that these detailed investigations will be undertaken during the forthcoming one to two years.</p> <p>The District Council notes the County Council’s view that ‘the proposal to safeguard land for a Marcham Bypass is justified, it being necessary to ensure that alternative ways of addressing traffic in this location are not compromised given increasing levels of traffic and the need to improve air quality’. The District Council also notes and welcomes the County Council’s confidence that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated through appropriate schemes resulting from the investigative work.</p> <p>The District Council share the County Council’s commitment to ensure that planning applications are correctly determined. This includes DP26: Air Quality, which is clearly stated in the SLR Report and it is the Council’s view that this provides a comprehensive framework for considering air quality impacts.</p>				

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Lee Church		Air Quality Evidence	See below	See below

This response makes a series of comments on the Air Quality Evidence. Comments include:

- It is stated that the traffic distribution data is provided by Glanville. Concerns are raised over the 'errors, validity and incorrect data usage' that therefore brings the air quality report into question.
- It is suggested that air quality monitoring locations are focused on Abingdon town centre, not Shippon.
- The suggestion in the report, that vehicle trips from Dalton Barracks being split between different routes is questioned.
- It is suggested that the proposal to open Faringdon Road East has not been properly assessed and is based on inaccurate data.
- It is suggested that the proposal to open Faringdon Road East poses an increased risk to life and should be considered negligent.
- An alternative approach is suggested for accessing the proposed development, consisting of a link road between Site access1 and the existing main barracks entrance on Cholswell Road.

OFFICER RESPONSE

The Air Quality Report relates to the designated AQMA's at Abingdon, Botley and Marcham. It does not seek to measure air quality impacts at other locations. The Council is satisfied with the conclusions of this report. The Council's letter to the Planning Inspector dated 30 November 2018 states:

"The Council's Environmental Protection Team Leader has reviewed the Air Quality Report and is content that this additional information, along with the information already submitted, is sufficient and proportionate to inform the Local Plan 2031 Part 2".

The references to Faringdon Road East are discussed in response to the Transport Evidence set out elsewhere in this table.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	Officer response
Lioncourt Strategic	Savills Roger Smith	Air Quality Evidence	See below	See below
<p>The issue of air quality has been raised by a number of objectors.</p> <p>The evidence base for the Local Plan Part 2 includes an air quality report which addresses cumulative impact of planned growth on the air quality management areas. The report was produced by SLR and is dated November 2018. The report refers to the Marcham Air Quality Management Area (AQMA) and concludes on Page 11 that the air quality impacts would be negligible. The report adds that on Page 6 that the District Council considers that the future provision of a Marcham Bypass would address any potential impacts associated with the Marcham AQMA and that there is a high degree of confidence that this scheme will be delivered.</p> <p>The air quality consultant for Lioncourt (M-EC) has produced an air quality update which is an appendix to this representation form. The update concludes that mitigation measures will be developed to mitigate/offset development emissions and support actions contained within the local Air Quality Action Plan. It is considered that mitigation options are available to mitigate/offset the development impact on the Marcham AQMA.</p> <p>Development Policy 26 of the Local Plan Part Two refers to air quality.</p> <p>It states that development proposals that are likely to have an impact on local air quality including those in, or within relative proximity to, existing or potential Air Quality Management Areas (AQMAs) will need to demonstrate measures / mitigation that are incorporated into the design to minimise any impacts associated with air quality. The policy adds that mitigation measures will be secured either through negotiation on a scheme, or via the use of a planning condition and/or obligation depending on the scale and nature of the development and its associated impact on air quality.</p> <p>Development Policy 26 therefore deals with the issue of air quality and the need for appropriate mitigation. No revision is required to site specific policies to address this issue.</p> <p>Please note that this response also included an attachment that is available to view on the Council website.</p> <p>OFFICER RESPONSE</p> <p>Noted</p>				

Miscellaneous – Additional Transport Evidence

Full name	Company / Organisation / Agent details	Comment category	Comment summary
Colin Thomas	Sunningwell Parishioners Against Damage to the Environment (SPADE) St Helen Without Parish Council	Transport Evidence	<p>There were a number of comments/objections received relating to the additional transport evidence prepared by Glanville for the proposed housing allocation at Dalton Barracks. Comments included the following:</p> <ul style="list-style-type: none"> • Transport Delivery Report is silent on modelling of the T Junction at the Sunningwell Road/Wootton Road to identify traffic through Sunningwell village, Lodge Hill interchange and Boars Hill • there are miscalculations and factual errors in the Report, for example 'With Dev' figure is lower than 'Without Dev' figure but shows an increase of 13.8% • calculations in the report are based on out of date data e.g. 2011 Census • survey data from January 2018 is incorrect, 323 vehicle movements are lost between MOD entrance on Barrow Road and Barrow Road/Faringdon Road junction • evidence on a YouTube video shows large number of vehicles cutting from Barrow Road through Elm Tree Walk to Faringdon Road • survey data is silent on through traffic to and from the Manor Preparatory School at Shippon along with other schools in the area • unreasonable to remove all existing Barracks traffic from the data in the Transport Delivery Report • surveys were undertaken in January 2018, but does not provide a specific date, if report was conducted out of school term time, this would affect the results significantly • no vehicle movements at the Faringdon Road/Cholswell Road junction • impact of the proposed Oxford to Cambridge Expressway has not been considered in the report • Marcham Road corridor traffic mitigation does not consider additional vehicle movements along Dunmore Road and movements resulting from new developments along the route of Lodge Hill • concerns over highway safety, construction traffic, parking and impacts on the environment due to infrastructure improvements along Faringdon Road • no indication in the Report for excellent public transport, cycle way of footpath connections • limited thought to how patterns of movement of occupants of the existing dwellings at Dalton Barracks will change when the base is closed down • without improved segregation from other traffic, will not increase the proportion of trips by cycle • Transport Delivery Report suggested it is not unreasonable to rely on existing bus services, routes and frequencies, which contradicts statement in Local Plan for improving bus service levels to 'turn up and go'
Victoria Talbot			
Pearl Lewis			
Anna Clarke			
Lee Church			
Michael Page			
Richard Bahu			
Mr Philip			
Noel Newson			
David Churchouse			

Full name	Company / Organisation / Agent details	Comment category	Comment summary
Cllr Emily Smith Dinah Hill	Liberal Democrat Group		<ul style="list-style-type: none"> • Proposal for a shuttle bus linking the site to Abingdon via Dunmore Road and Oxford Road could impact on the viability of other bus services • survey carried out by parish council showed 443 vehicles along Barrow Road towards Faringdon Road, evidence has suggested average number of vehicles entering Shippon over the last 2 months is 534, increase of over 20% in 3 years • discrepancies and inconsistencies in the Transport Delivery Report cast doubt on the validity of the additional air quality evidence • Glanville Report contradicts evidence in the previous DIO's Transport Delivery Document for Dalton Barracks dated November 2017 produced by Paul Basham Associates Ltd, as it is based on vehicular access via Faringdon Road East • Main Modification for the Dalton Barracks allocation references education provision, but not a new school suggesting parents would need to drive into Abingdon • new proposed access roads for the site could encounter similar traffic and air quality issues to the village of Marcham • proposal for Barrow Road East includes dimensions that would be dangerous for pedestrians • lack of consideration for preserving the rural landscape and setting of heritage assets due to site access proposals along Faringdon Road East and at Sycamore Close to Faringdon Road.
<p>Officer Response</p> <p>The Transport Delivery Report (PC03.4-1 30 November 2018) provides a proportional evidence base in response to queries raised by the Planning Inspector during the Local Plan Examination process in accordance with national policy (Paragraph 182 2012 NPPF). It is not intended to present fully worked highways solution or replace a full Transport Assessment. The Local Plan process has been informed by the Evaluation of Transport Impacts(ETI) evidence base, which is consistent with the approach taken for the adopted VOWH Part 1 plan, along with other Oxfordshire Plans.</p> <p>Any subsequent planning applications for the site would be supported by a full, multi-modal Transport Assessment providing a greater level of detail, looking at a wider study area. To inform the Transport Assessment, it will be necessary to re-survey, or partly re-survey, traffic movements at all junctions and survey a number of new junctions, including those identified within the responses.</p> <p>The following more detailed responses are provided to assist with some of the issues raised through the consultation responses:</p> <ul style="list-style-type: none"> • Potential amendments to the arrangement of Barrow Road are illustrative and aim simply to indicate the type of alterations that could be implemented, with the specific goal of reducing through-traffic and diverting it to more appropriate roads. The final arrangement of Barrow Road would be developed 			

Full name	Company / Organisation / Agent details	Comment category	Comment summary
			<p>in consultation with the public and key stakeholders.</p> <ul style="list-style-type: none"> • Access is proposed via Faringdon Road East because it would allow the bus service to more easily access the south of the site. The private access, referred to as Sycamore Close in many responses, is narrower than Faringdon Road given that the Barracks fence line along it will be retained. The wider public highway corridor along Faringdon Road provides greater scope for highway improvements. However, these matters can be considered in greater detail through the more detailed assessment. • Significant enhancements to local walking and cycling infrastructure are proposed and will continue to be developed in consultation with the local Highway Authority. • Highway safety is of paramount importance. Any proposed highway works, whether mitigating traffic impact or providing improved sustainable connections, would be subject to detailed design and Road Safety Audits. • The traffic surveys summarised in the Report were undertaken in term time and therefore include existing school traffic. Any new traffic surveys will also be commissioned in term time and all data will be in the public domain on submission of the planning application. • Enhanced bus services are being developed in consultation with bus operators and Oxfordshire County Council. A primary school is to be provided within the site and it is anticipated that many older pupils would walk or cycle to secondary schools in Abingdon. It is recognised that Abingdon will remain an important destination for future residents of Dalton Barracks. Nevertheless, it is appropriate to amend the traffic distribution to account for the current and planned growth in jobs provided by Science Vale. The treatment of school traffic will be considered by the full Transport Assessment to support any planning applications. • The developer will need to liaise with Highways England on the Oxford to Cambridge Expressway to ensure that the proposals integrate with it as necessary. It is understood that public consultation on refined route options will be held later in 2019. • The traffic distribution has been based on the 2011 Census which is the latest large-scale dataset available. Exclusion of Shippon from the distribution assessment relates only to the distribution of new traffic from the site (in other words, the existing traffic may include residents working at Dalton Barracks, which wouldn't be the case in the future). Traffic from these existing houses has so far been accounted for in the traffic surveys. The impact of the closure of the Barracks on trips generated by these houses will be considered as part of the Transport Assessment.

Full name	Company / Organisation / Agent details	Comment category	Comment summary	
<ul style="list-style-type: none"> The Council is content that the flow diagrams included within the report serve a specific purpose and are correct. The difference between flows at either end of Barrow Road is due to vehicles travelling along Elm Tree Walk, located in-between. The site access junctions are shown to identify their locations and the flows are '0' as no survey data has been gathered in these locations at this time. It would have been dishonest to suggest otherwise. As noted earlier, through the Transport Assessment process traffic surveys will be undertaken at these junctions. It has been suggested that only 1% of traffic would use Faringdon Road. This is a misinterpretation of the diagram at Appendix E of the Transport Delivery Report and the figure is 9%. 				
Beata Ginn	Highways England	Transport Evidence – Highways England	<p>Comments were received from Highways England regarding the additional transport evidence, including:</p> <ul style="list-style-type: none"> question the statement in para 3.4 that the primary school is provided with the intention that it serve the development only, rather than providing material additional capacity to serve existing primary school demand arising off site question the statement in para 3.5 that trips associated with the school will be internalised, as the site is located in a rural area and proposed school has potential to attract pupils from nearby villages question whether the Marcham Interchange peaks match the network peak, as SRN peaks are often earlier or later yet to be confirmed by modelling that traffic conditions are anticipated to improve with southbound slip roads at Lodge Hill it is recommended applicant consults with Highways England at earliest opportunity to advise and assist any proposed mitigation necessary on the A34 	<p>It is noted that Highways England reference the proposed upgrades to the A34 at Lodge Hill, which is now fully funded with delivery expected in early 2020's. It will of course be important for the more detailed assessment work to be undertaken as part of a future planning application to take account of the latest/ appropriate information at the time. The District Council is therefore pleased to see the commitment from Highways England to continue to participate with key stakeholders including the applicant as part of this process.</p>

Full name	Company / Organisation / Agent details	Comment category	Comment summary	
Susan Halliwell	Oxfordshire County Council	Transport Evidence – Oxfordshire County Council	<p>1. Oxfordshire County Council is concerned that the Additional Transport Evidence provided is presented without the supporting letter to the Inspector dated 30th November 2018. Although this letter is still available to view online, it is presented separately on the Examination page. In particular, this letter is important because it sets out a critical caveat to the contents of the Additional Transport Evidence.</p> <p>This states that: 'Oxfordshire County Council, in their capacity as Highways Authority, have reviewed the Transport Delivery Report and is content this additional information, along with the information already submitted, is sufficient and proportionate to inform the allocation of 1,200 dwellings at Dalton Barracks within the plan period up to 2031. This does not prejudice the County Council's responsibilities in responding to any future planning application.'</p> <p>Both Oxfordshire County Council and Vale of White Horse District Council 'recognise that further transport planning assessment will be required to support a future planning application at Dalton Barracks'.</p> <p>2. We feel that it is necessary to reiterate the point above, as the Transport Delivery Report does not provide a conclusive summary of transport-related issues.</p>	<p>It is noted that the Oxfordshire County Council response to this consultation refers to detailed investigations into the Frilford Junction Improvements identified as part of the Main Modifications as being necessary before development at Dalton Barracks and Kingston Bagpuize (MM27 and MM28) can come forward, and that 'the various alternative ways of addressing traffic' will be investigated at the same time; it is understood this includes Marcham Bypass. Furthermore, that the Oxfordshire County Council response states 'we are confident that effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated through appropriate schemes resulting from the investigative work'.</p> <p>The Council letter dated 30 November 2018 accompanying the Additional Transport Evidence states that: 'Oxfordshire County Council, in their capacity as Highways Authority, have reviewed the Transport Delivery Report and is content this additional information, along with the information already submitted, is sufficient and proportionate to inform the allocation of 1,200 dwellings at Dalton Barracks within the plan period up to 2031. This does not prejudice the County Council's responsibilities in responding to any future planning application'. In response to this consultation, Oxfordshire County Council state both Oxfordshire County Council and Vale of White Horse District Council 'recognise that further transport planning assessment will be required to support a future planning application at Dalton Barracks'.</p>

