

**VWHDC Local Plan 2031 Part 2: Objection to proposed construction of 600 houses on
Fyfield Land Adjoining Kingston Bagpuize (wrongly described as East Kingston Bagpuize
with Southmoor (HELAA ref KBAG A)**

Note by Fyfield and Tubney Parish Council

Fyfield and Tubney Parish Council **oppose** the proposal by Lioncourt Strategic Land to build 600 houses on Fyfield land to the east of Kingston Bagpuize and Southmoor and **object to** the District Council's inclusion of the site within its 'strategic allocations' in the Local Plan 2031 Part 2. In a recent survey of parishioners by the Parish Council, 89 households (more than half) responded. **All**, covering 154 adults, **were against the proposed development.**

The proposed development is:

- misnamed
- incompatible with Fyfield village's distinctive natural and built environment;
- unsustainable;
- in conflict with the Vale District Council's current and emerging planning policies and objectives (including its Settlement Hierarchy);
- justified on an unsound, selective and biased evidence base;
- superfluous to requirements in meeting the Vale District Council's housing targets (including its share of Oxford's unmet need) to 2031
- devoid of benefit to the residents of Fyfield and Tubney to offset the harm it will do

We ask the District Council to withdraw the site from the list of preferred sites to be included in the version of the Local Plan Part 2 to be submitted for Inspection.

1. Misnaming

Since the land in Fyfield first became a candidate for consideration, the District Council and the developer have wrongly described it as 'East Kingston Bagpuize with Southmoor' and it is located in LPP2 Policy 4a as being in the 'Settlement/Parish' of Kingston Bagpuize with Southmoor. **It is not. It lies in the parish of Fyfield and Tubney and is part of Manor Farm based within Fyfield village.**

The misnaming appears to be designed to allay the sensitivities of the local community during the preliminary evaluation of the site and to give the impression that the site is a more or less natural extension of the 'sustainable (sic) larger village of Kingston Bagpuize with Southmoor.' (LPP2 para 2.31) The truth, which the misnaming disguises, is that the proposed development represents **the irruption of an inappropriate urban** (see LPP2 Appendix A page 22) **commuter dormitory into valuable Fyfield farming land in open countryside, drastically reducing the gap between settlements within a key landscape feature of the Vale.** These points are examined further in the discussion of policies and objectives below.

There is a strong element of cynicism in the District Council's approach as illustrated by the response of planning officers to challenges about the misnaming of the site. They have

repeatedly claimed that the wrong name is justified because the site is contiguous with Kingston Bagpuize with Southmoor (KBS). The truth is that at present there are only two isolated houses, outside the built area of KBS, bordering the site. When that is pointed out, the planning officers point to the granting of permission for 280 houses on the western border of the site – a stark demonstration of **cynical planning creep and coalescence**.

2 . Incompatibility with Fyfield

Fyfield is one of a number of long-established villages spaced at discrete intervals in attractive open countryside along the North Vale Corallian Ridge, a key landscape feature of the Vale District, which runs from Cumnor to Faringdon. The core of its built-up area (some 70 houses), like that of its adjoining hamlet of Netherton (15 houses), is a conservation area, emphasising its significance as a small rural community with historic roots. The village is mentioned in the Domesday Book and some buildings date back to the medieval era. The whole village, including all the land within it, was given to St John's College Oxford in the 16th century by the college's founder, Sir Thomas White, and remained in the ownership of the College for four hundred years until the second half of the 20th century when a programme of house sales was initiated. The farming land, a number of the houses and plots of land in the village, and the village pub remain the property of St John's College. The parish boundary with KBS, to the west of the village follows the line of an Anglo-Saxon feature, Aelfryth's Ditch. There is currently over a kilometre of open countryside between Fyfield and Kingston forming a strategic gap that is important in maintaining not only the village's separate and distinct character but also the nature of the Corallian Ridge. The gap is already due to be reduced following the approval of plans to build on a site adjoining Kingston immediately to the west of the proposal site.

A 600-house urban commuter dormitory development of close-packed modern houses – in effect a suburb of KBS encroaching to within a few hundred yards of Fyfield – is totally **disproportionate in scale to the present village and completely at odds with and alien to its historic heritage, rural nature and environment**. The strategic gap between KBS and Fyfield is already being eroded and would be unacceptably reduced by the proposal, opening up the threat of further creeping encroachment at a later date.

3 . Unsustainability

The **National Planning Policy Framework** ('NPPF') identifies three dimensions to sustainable development: *economic* – '**the timely delivery of sufficient land in the right locations to support growth and....coordinating development requirements such as the provision of infrastructure**'; *social* – '**supporting vibrant communities through the provision of housing, the creation of high quality living and working environments and accessible local services**'; *environmental* – '**protecting and enhancing our natural, built and historic environment, using resources prudently...**'. These criteria are reflected in the Vale Local Plan 2031 Part 1 ('LPP1') by the following Strategic Objectives:

- **SO 3:** Direct growth to the most sustainable locations in the district, ensuring development is integrated with and respects the built and natural heritage and

creates attractive places in which people will want to live, as well as being supported by a sufficient range of services and facilities.

- **SO 8:** Reduce the need to travel and promote sustainable modes of transport.
- **SO 9:** Seek to ensure new development is accompanied by appropriate and timely infrastructure delivery to secure effective sustainable transport choices for new residents and businesses.

The Lioncourt proposal lies on land in Fyfield and Tubney Parish. However its effect would be to add a self-standing dormitory suburb, occupied by commuters, to the new conurbation of Kingston Bagpuize with Southmoor. (As noted above, the template for the development at LPP2 Appendix A page 22 describes the objective as an urban development). There has already been excessive development in KBS (700 houses have recently been built or approved in a village originally containing 800 – a disproportionate and unmanageable 85% increase that is already causing serious infrastructure problems).

There is no sense in which the Lioncourt site is in the ‘right location’: in particular it completely fails to minimise the need to travel as required by SO8 above. There is no prospect of employment growth within cycling or pedestrian range for it to support and in effect all the employed people in the development (say between 500 and 800) will take to the roads; major centres of employment are between 10 and 20 miles away and the absence of local employment means that **it will increase, not reduce, the need to travel to work on roads which are always busy and are seriously congested at peak hours.**

In this context we take strong exception to the facile and specious suggestion put forward in paragraphs 2.31 and 2.32 of LLP2 that the existence of good public transport connectivity (effectively the 66 bus) makes the site appropriate as living space for people working elsewhere in Oxfordshire and will ‘help to minimise the need for car travel’. **The reality is that almost all working residents of the proposed development will have to travel to work by car.** The 66 service is irrelevant to people working in the Science Vale or commuting via Didcot to London; and good though the bus service is, it follows a limited route into Oxford centre, whereas most new Oxford jobs will be located in developments on the city outskirts. It will therefore represent only the start of a complex public transport journey that is likely to discourage most users. Moreover the bus shares the same difficulties as other road users during peak hours. So the new development will add substantially to traffic congestion (and to the air pollution that this causes, an issue about which H M Government is currently very concerned across the country.)

It is hard to overstate the seriousness of this congestion. The stretch of road is recognised as a bottleneck in LPP2 Topic Paper 5: Transport and Accessibility. People travelling past Kingston on the A420 to Oxford are regularly subjected to long delays at the morning peak hour with traffic tailing back on occasion for up to a mile west of the A415 roundabout. Flows on the A415, to Abingdon and the south, and north to Witney, are also constrained at peak times. **The Oxford County Council has identified the A420/A415 roundabout as exceeding its capacity bounds.** There are corresponding, if less extreme, problems in the evening rush hour. Local inhabitants are forced into ridiculous detours in order to find a safe way of joining the traffic on the roads concerned. It should also be noted that in Tubney, the

A420 runs through a built area developed in the eighteenth, nineteenth and early twentieth centuries, including residential properties, a church and a business park. The existing heavy traffic flows have serious detrimental effects on residents, employees and church goers. The situation is already unacceptable and will be made much worse by the proposal. The new roundabout on the A420, proposed to divert traffic from Kingston, would cause additional delays – and, we understand, had earlier been opposed by Oxfordshire County Council highways officials for that reason.

The proposed roundabout—without which the site will be unserviceable - is of extreme concern to Fyfield. It will bring the light pollution associated with major traffic interchanges half a mile closer to the village. It will also have a disproportionate effect on traffic noise and air pollution in Fyfield, since vehicles (notably HGVs) will still be accelerating away from the roundabout and changing gear within a hundred yards upwind of the village. There is no mention of this disproportionate effect in Topic Paper 2 – Site Selection which we believe to be seriously biased in this and other respects (see section 6 below).

It is important to note – as LPP2 and its supporting documents conspicuously fail to do – that the Oxford Growth Board’s review in September 2016 of possible sites to help meet Oxford’s unmet housing need ruled the site out of contention on the grounds of distance from Oxford and inadequacy of transport infrastructure. Moreover the Sustainability Appraisal for LPP2 notes that the site is relatively distant from Oxford and the Science Vale – a comment which is notably absent from the site analysis in Topic Paper 2.

The proposal fails to meet the NPPF’s economic and social dimensions of sustainability or the requirements of the District Council’s Objectives SO 3 and SO 9 quoted above. It will place unmanageable additional burdens on Kingston’s infrastructure, development of which has failed to keep up with the housing programme. In particular the existing primary school, which is already expanding to the maximum possible on the land available to it, would be inadequate to cover the new development. Funds for a new school, and a contribution towards additional off-site secondary and SEN school capacity, will have to be made available by the developer and at least 5 acres of land will need to be reserved within the development for a new school. **We question the affordability of doing so at the same time as making space for the bypass road within the development and finding the funds for two new roundabouts at about £4 million each, and doubt the deliverability of any S106 agreement committing the developer to doing so.**

The suburb will be remote in ethos from Fyfield (and separated from it by a trunk road), as well as some distance from services and community activity in Kingston; but will have neither the locational logic nor a strong central core of its own to make it a vibrant community in its own right. **A densely packed urban development in the countryside (even one considerably less ambitious than the Lioncourt proposal) does the opposite of protecting, enhancing, respecting or integrating with the natural or the built environment.** Housing people in a sterile development unsympathetic to its rural environment, lacking proper infrastructure, distant from work opportunities and with overburdened transport links – the

wrong houses in the wrong place - offers no public benefit. **It is hard to imagine a less sustainable site in terms of the NPPF and of the strategic objectives adopted for the Vale.**

Moreover the land earmarked for the proposal is shown as Category 2 (among the best and most versatile agricultural land) in the District Council's Sustainability Assessment for LPP2. To support national objectives of sustainability and food self-sufficiency, NPPF requires that the Council 'seek to use areas of poorer quality land in preference to that of a higher quality' when considering the proposal. **There is no reference to this requirement in the Plan's analysis of the site.**

4. Conflict with District Council Policies and Objectives

LPP1 includes the following among its key challenges and opportunities:

Protecting our high quality landscape

The landscape of the district is central to the rural character of the Vale, from the Corallian Ridge to the Lowland Vale to the North Wessex Downs AONB. Key landscape features need to be respected, retained and enhanced to maintain the local character and distinctiveness of the landscape of the Vale

LPP1's Spatial Vision states among other things that: *By 2031 ...New development will have respected the local character of the Vale, protecting its outstanding and distinctive natural and built environment and will continue to conserve and enhance its important heritage*

Policy NE7 in the **Vale Local Plan 2011**, retained as a saved policy in LPP1, states that *'development which would harm the prevailing character and appearance of the North Vale Corallian Ridge... will not be permitted unless there is an overriding need for the development and all steps will be taken to minimise the impact on the landscape.'*

Fyfield, as noted above, lies on the Corallian Ridge which has in general been well protected from unsuitable development except insofar as the need for the soft sand which underlies it has led to extensive quarrying. That can recognisably be an overriding need in terms of saved policy NE7. No such overriding need can be claimed for the Lioncourt site which is one of a large number of possibilities put forward in response to the call for sites.

We note and strongly object to the absence of this saved policy, either in words or in intent, in the Development Policies proposed in LPP2, which fails to give substance to the key challenge above. The saved policy is ignored throughout LPP2 and its supporting documentation, leading us to suppose that both the planning team in the DC and their advisors have been authorised to behave as if the saved policy had already been dropped. However figure 1.1 of LPP2 shows that saved policies are part of the local plan and development plan until Part 2 of the Plan is adopted. They therefore cannot be ignored during the preparation of Part 2. **The failure to take account of saved policy NE7 in assessing the Fyfield site invalidates the conclusions of the assessment.**

In contrast, the principle of Saved Policy NE 10 is reinforced in LPP2's Development Policy 28: Settlement Character and Gaps, which reads ***'Development proposals that would result in the physical joining or the unacceptable narrowing of a countryside gap between two***

separate settlements will not be permitted.’ In contradiction to this policy **the three-fold reduction in the gap between Fyfield and KBS, from well over a kilometre to under 300 metres, has been ignored in the assessment of the site. Again, this invalidates the conclusions of the assessment.**

The proposed development is incompatible with the objectives and policies above. The Council has specifically recognised the Corallian Ridge as one of the Vale’s key landscape features needing respect, retention and enhancement – to which the Lioncourt development can only make a negative contribution. By withdrawing the site from its strategic allocation the Council will make a major contribution to maintaining the local character and distinctiveness of the Vale landscape and to protecting its outstanding environment.

5 . Conflict with District Council Settlement Hierarchy

In Core Policy 3: Settlement Hierarchy, **LPP1** sets out development criteria by decreasing settlement size to meet the future housing requirement, and lists the towns and villages of the Vale under four identified categories (market towns, service centres, large villages and smaller villages). Fyfield is not listed in any of the categories and therefore is part of the open countryside which is covered by the following final sentence of the Core Policy:

‘Development in open countryside will not be appropriate unless specifically supported by other relevant policies set out in the development plan and national policy’

Although Lioncourt systematically and quite wrongly describe the proposal as ‘Kingston Bagpuize’, the land on which it would be built is all within the parish of Fyfield and Tubney and lies east of the Anglo-Saxon parish boundary described above. It will not become contiguous with any group of houses in Kingston (apart from the tail-ends of ribbon development along the old A420 and A415) until the land to its west is developed in accordance with a recently granted outline approval. **As land in open countryside within Fyfield and Tubney Parish the site should be dealt with under the relevant part of the Core Policy quoted above.**

We have demonstrated above that the development is incompatible with key elements of national policy. We shall show (see section 7 below) that the use of the site is not essential to meet any relevant policy in the Local Plan.

6 . Unsound, Selective and Biased Evidence Base

Many passages in LPP2 (eg the slipshod arguments in paras 2.31 and 2.32) and its supporting documents give the **clear impression that the Fyfield site had been selected as a front runner in advance and that the planning team and their consultants are seeking to justify that selection rather than to examine the site impartially.** This assertion can be justified most clearly by a detailed examination of the analysis of the site in LPP2 Topic Paper 2: Site Selection. (We note in passing that the Topic Paper makes a virtue of arriving at its recommended allocations after consulting ‘key stakeholders’ – a category which evidently excludes the communities concerned and their democratic representatives.)

The topic paper considers each site under a number of headings in a RAG (Red-Amber-Green) analysis. The Fyfield site is identified as Site 27 – KBAG_A and wrongly named. **The analysis is inaccurate, incomplete and/or disingenuous in its treatment of several of the factors concerned and reaches incorrect conclusions as described hereafter:**

- I. **Description** Fails to identify the land as being in Fyfield; does not identify it as good quality (category 2) land that requires authority to look elsewhere if possible
- II. **Landscape** (categorised Green) Fails to recognise location in one key landscape feature, the Corallian Ridge (protected by Saved Policy NE7) or harm to open views over another, the Lowland Vale, (NE 9) to a third, the North Wessex Downs (*Relevant comparison: emphasis on high value landscape in rejecting site 12 at Drayton*); fails to acknowledge three-fold reduction in gap between settlements threatening rural identity of Fyfield conservation area; claims as credit ‘good fit’ with LPP1 site, celebrating creeping coalescence. **Conclusion:** should be categorised **Red**.
- III. **Ecology** (categorised Green) Fails to mention good quality of farming land – which requires authority to look elsewhere if possible. **Conclusion:** should be categorised **Amber**
- IV. **Historic Environment** (categorised Amber) Fails to discuss damage to Fyfield conservation area and its significance as preserving a small rural community (*Relevant comparison: red flagging of site 30 at Fyfield as harmful to ‘sense of rurality’ of Fyfield and Tubney*) **Conclusion:** should be categorised **Red**
- V. **Transport Impact** (categorised Amber) Fails to quote the LPP2 Sustainability Appraisal’s acknowledgement that site is distant from employment centres, or Oxford Growth Board’s red flagging the site as too far from Oxford and without adequate transport infrastructure. Fails to acknowledge that access to A420 will add to congestion on a stretch of road identified in the Transport and Accessibility study as a congestion hotspot. Ignores the fact that increased congestion on A420 and A415 will exacerbate 'rat running' through Kingston Bagpuize, Fyfield and Tubney. Appears to argue that residents will need to use bus to get to KBS amenities (*Relevant comparison: description of the (much closer) site 28 at KBS south as relatively distant from village centre*). **Conclusion:** should be categorised **Red**
- VI. **Access Issues** (categorised Green) Fails to support developer’s confidence that A420 access is possible or to take account of County Council’s reported opposition to the necessary roundabout that will add to problems at a known congestion hot spot. Simultaneously failing to acknowledge that Oxfordshire County Council does not have any capital funding to spend on A420 improvements. Fails to acknowledge non-viability of site if all traffic goes out onto A415 and adds to congestion in KBS and/or puts impossible load on Digging Lane. **Conclusion:** should be categorised **Red**.

VII. Public Services (categorised Amber) Indicates doubt about conclusion later in the analysis (see sub-para 9 below) that development will provide new school. Does not recognise probable unaffordability of previously unbudgeted infrastructure requirements. Does not acknowledge that Oxfordshire Clinical Commissioning Group (OCCG) has raised concerns regarding access to a GP facility, given no existing facility in Kingston Bagpuize and significant committed growth. (*Relevant comparison: negative comments on feasibility of supporting school at Site 29 Kingston Bagpuize West*) **Conclusion:** should be categorised **Red**

VIII. Environmental Health (categorised Green) Mentions but, by ignoring Fyfield's existence, totally understates road noise and air pollution environmental impact. The village will carry the full brunt of extra noise and atmospheric pollution carried on the prevailing wind and will also suffer substantially increased light pollution. (*Relevant comparison; red flagging of Site 13 West of Drayton because of proximity of A34*). **Conclusion:** should be categorised **Red**.

IX. Sustainability Appraisal Ignores impact on Fyfield and all negative factors except Kingston Bagpuize House. Makes unsupported claim that development would provide new school and implies doubt about road improvements without which scheme would not be viable.

X. Recommendation Makes claim to be close to historic core of KBS ignoring the fact that the site is more remote from the real centre where most amenities are located. Much more remote than site 29 (KBA_C) that is not proposed for allocation. New school reduced to possibility, not certainty. Ignores all negative factors and, as shown by the comments above, is quite simply wrong.

Note: the relevant comparisons given above show the extent of bias in the treatment of the Fyfield site by comparison with other rejected sites and do not imply that we favour development of any of the sites concerned.

The effect of these corrections is shown in Appendix A

A similar critique can be mounted of the Landscape Capacity analysis of the site, which:

- Ignores the site's position in the heart of the Corallian ridge, a key landscape feature of the Vale
- Claims consistency with the settlement pattern of Kingston and ignores its inconsistency with the parish on which it lies
- Makes a completely specious claim that the effective gap between Fyfield and the next settlement ends at the A420 (300 metres) rather than KBS (more than a kilometre)
- Uses a bland photograph pointing north to illustrate the site, ignoring the long glimpse views over the Lowland vale to the Downs ten miles to the south (Appendix B)
- Understates the impact of the site from viewpoints to the south
- Ignores proximity to Fyfield conservation area
- Understates the distinctiveness of the site

- Underestimates the rural and agricultural impact of the site on people using the bridleway.

Correcting for these factors gives substantial sensitivity and substantial value – justifying a low landscape capacity not the high one arrived at by the study.

The overwhelming conclusion from the commentary above is that the District Council’s analysis conceals some material facts, understates others, and presents the arguments in a way that is loaded towards their desired conclusion that the site is suitable for development. We ask the Council to appoint an independent reviewer to look at all the supporting documentation and to report on the extent to which it is legally jeopardised by the lack of balance and impartiality between sites. We think it is and that the selection of the Fyfield site for development is invalid. The site should be deleted from the list.

7. Superfluosity

The requirement on the District Council, taking account of its adopted plan to accommodate 20,560 dwellings in the period to 2031 and the duty to help Oxford meet its purported unmet need, is to establish a total supply of 22,760 dwellings. It is electing to add 1400 houses to the supply in the South East Vale, taking the total ‘requirement’ to 24,160. The full total of allocations, including those in LLP 2, shown in the table on page 24, is 24,718, a surplus of 560 – approximately the equivalent of the Lioncourt development proposal. The site is not needed to meet the Council’s total requirement (including its share of Oxford’s unmet needs). Given the unsuitability of the site demonstrated above, we suggest that the District council should remove it from the list of allocations and add 40 to the numbers to be found from windfalls.

8. The impact on Fyfield

Building a commuter-based dormitory suburb of urban character on good land belonging to a Fyfield farm in Fyfield and Tubney Parish will bring only disadvantages to Fyfield and its community. It is completely alien to the rural nature of the existing village, to its countryside and to the Corallian Ridge, a key landscape feature of the Vale. The suburb’s residents will inevitably gravitate to the larger community of Kingston Bagpuize with Southmoor and will play no positive role in the life of Fyfield village. The proposal will drastically reduce the strategic gap between the village and its much larger neighbour, impair the village’s sense of rurality and substantially harm its conservation area and its significance in preserving a small rural settlement.

Most seriously – in practical terms – the proposed revision to the layout of the A420 (should the County Council alter its reported opposition to it) will increase background traffic noise, compromise air quality in the village and add massively to light pollution. Several villagers would look straight out at the new roundabout and its lighting and many others would be affected to a greater or lesser degree by fumes, noise and night time light corruption. It would become even harder than it already is for villagers to drive out of the village at peak times or to cross the A420 safely at any time. **The proposal offers no benefit of any kind, economic, social or environmental, to the public or social structure and life of the villagers of**

Fyfield or the rest of the parish. Conversely it threatens welfare in Fyfield, Tubney and indeed other neighbouring villages.

9. Conclusion

The District Council should rule out the proposal as superfluous to its strategic needs and grossly prejudicial to the welfare of the parish and community of Fyfield and Tubney and the interests of the Vale at large.

Appendix A

<p>Site 27 KBAG_A</p>	<p>East of Kingston Bagpuize with Southmoor South West of Fyfield and Tubney</p>		
<p>Vale of White Horse DC Assessment</p>		<p>Fyfield and Tubney Assessment</p>	
<p>Description: Agricultural land split by the old Oxford Road. Site is bounded to the north by the A420, to the west by the existing settlement of Kingston Bagpuize with Southmoor and recently permitted housing scheme, to the south by recreational grounds and recently permitted housing scheme, and to the east by Woodhouse Fruit Farm.</p>		<p>Maximum Capacity - Up to 860 dwellings</p>	<p>Description –As opposite plus Fails to identify the land as being in Fyfield; does not identify it as good quality (category 2) land that requires authority to look elsewhere if possible</p>
<p>Landscape</p>	<ul style="list-style-type: none"> ■ Part of the setting to the Conservation Area and forms the eastern approach to the village. ■ Open views to the road would need addressing. ■ Trees to the west act as a natural boundary to the village (fits well with the LPP1 allocation) 		<ul style="list-style-type: none"> ■ As opposite plus ■ Fails to recognise location in Corallian Ridge (protected by Saved Policy NE7) or harm to open views to South Oxfordshire downs (<i>Relevant comparison: emphasis on high value landscape in rejecting site 12 at Drayton</i>); ■ Fails to acknowledge three-fold reduction in gap between settlements threatening rural identity of Fyfield conservation area; claims as credit 'good fit' with LPP1 site, celebrating creeping coalescence.
<p>Flooding</p>	<ul style="list-style-type: none"> ■ Fluvial flood risk zone 1 (low risk). ■ Limited surface water flood risk. 		<ul style="list-style-type: none"> ■ As opposite
<p>Ecology</p>	<ul style="list-style-type: none"> ■ Potential impacts on Appleton Lower Common SSSI and Frilford Heath, Ponds and Fens SSSI, including through generation of air pollution, potential impacts on the water table, or increased recreational pressure. ■ Population of Great Crested Newts at the Millennium Green. Development here could fully enclose the green, creating issues of biodiversity offsetting. 		<ul style="list-style-type: none"> ■ As opposite plus ■ Fails to mention good quality of farming land – which requires the authority to look elsewhere if possible.

<p>Historic Environment</p>	<ul style="list-style-type: none"> ■ Partially abuts the Kingston Bagpuize Conservation Area. ■ This site would be highly visible on the approach to Kingston Bagpuize house. This is a grade II* country house and an important part of its significance is as a country house. Housing development on the site proposed would make it feel less like a house in the country and harm this significance. This could be addressed by keeping housing off the southern part of the site and a good thick belt of tree planting, thick enough to shield new development even in winter. ■ In addition, the western boundary of the site is on the line of Aelfrith Ditch. Although not scheduled, this earthwork may still be of national significance. 	<ul style="list-style-type: none"> ■ As opposite plus ■ Fails to discuss damage to Fyfield conservation area and its significance as preserving a small rural community (<i>Relevant comparison: red flagging of site 30 at Fyfield as harmful to 'sense of rurality' of Fyfield and Tubney</i>)
<p>Transport Impact (incl. public transport)</p>	<ul style="list-style-type: none"> ■ Site could potentially deliver/facilitate a new link road between A420 and A415. There are safety concerns regarding the access onto the A420, potentially necessitating a new strategic junction. ■ Kingston Bagpuize is located on a strategic transport corridor (A420) and has an excellent bus service (3/hour, with good potential to increase to 4/hour). The site to the east [Site 27] is somewhat distant from the village centre, but could have good access to the bus route. 	<ul style="list-style-type: none"> ■ As opposite plus ■ Fails to quote the LPP2 Sustainability Appraisal's acknowledgement that site is distant from employment centres, or Oxford Growth Board's red flagging the site as too far from Oxford and without adequate transport infrastructure. ■ Fails to acknowledge that access to A420 will add to congestion on a stretch of road identified in the Transport and Accessibility study as a congestion hotspot. ■ Ignores the fact that increased congestion on A420 and A415 will exacerbate 'rat running' through Kingston Bagpuize, Fyfield and Tubney and other villages further afield. ■ Appears to argue that residents will need to use bus to get to KBS amenities (Relevant comparison: description of the (much closer) site 28 at KBS south as relatively distant from village centre).

<p>Access Issues</p>	<ul style="list-style-type: none"> Site can be accessed from the A415. Alternative access could be provided directly from the A420 however this is untested and is likely to require infrastructural improvements. 	<ul style="list-style-type: none"> As opposite plus Fails to support developer's confidence that A420 access is possible or to take account of County Council's reported opposition to the necessary roundabout that will add to problems at a known congestion hot spot. Simultaneously failing to acknowledge that Oxfordshire County Council does not have any capital funding to spend on A420 improvements. Fails to acknowledge non-viability of site if all traffic goes out onto A415 and adds to congestion in KBS and/or puts impossible load on Digging Lane.
<p>Water and Wastewater Issues</p>	<ul style="list-style-type: none"> Drains to the Kingston Bagpuize waste water treatment works. The system is above capacity, is unlikely to cope with increased demand and reinforcement in the sewers would be required. 	<ul style="list-style-type: none"> As opposite
<p>Public Services</p>	<ul style="list-style-type: none"> Primary education: needs to be considered in context of other growth at Kingston Bagpuize with Southmoor. The existing village school (John Blandy) is in the process of expanding from 1 form entry to 1.5 form entry. This expansion is only sufficient to meet the needs of already permitted housing growth. The school's site area would not support further expansion of the school, unless a land swap can be agreed to extend the school site. Secondary education: would contribute towards need for additional places in the Faringdon/Abingdon area. Existing nearest secondary schools (Faringdon Community College & Matthew Arnold) do not have site capacity to expand sufficiently for this scale of development, but in isolation it does not make a new secondary school viable. 	<ul style="list-style-type: none"> As opposite with respect to secondary education plus Indicates doubt about conclusion later in the analysis (see sub-para 9 below) that development will provide new school. (Relevant comparison: negative comments on feasibility of supporting school at Site 29 Kingston Bagpuize West) Does not recognise probable unaffordability of previously unbudgeted infrastructure requirements. Does not acknowledge that Oxfordshire Clinical Commissioning Group (OCCG) has raised concerns regarding access to a GP facility, given no existing facility in Kingston Bagpuize and significant committed growth.

Other Utilities	<ul style="list-style-type: none"> 3 high voltage power lines traverse the site. 	<ul style="list-style-type: none"> As opposite 	
Environmental health	<ul style="list-style-type: none"> Road noise from A420; Air pollution from A420; Contaminated land 	<ul style="list-style-type: none"> Mentions but, by ignoring Fyfield's existence, totally understates road noise and air pollution environmental impact. The village will carry the full brunt of extra noise and atmospheric pollution carried on the prevailing wind and will also suffer substantially increased light pollution. (Relevant comparison; red flagging of Site 13 West of Drayton because of proximity of A34). 	
Sustainability Appraisal	<ul style="list-style-type: none"> Good public transport connectivity. Development would deliver a new school, and a new road could divert traffic away from the existing village centre. Heritage is a constraint, given the adjacent Kingston Bagpuize Conservation Area. 	<ul style="list-style-type: none"> Ignores impact on Fyfield and all negative factors except Kingston Bagpuize House. Makes unsupported claim that development would provide new school and implies doubt about road improvements without which scheme would not be viable. 	
<p>Recommendation:</p> <p>Site is proposed for an allocation of around 600 dwellings, subject to masterplanning</p>	<ul style="list-style-type: none"> The site is adjacent to the larger village of Kingston Bagpuize with Southmoor, which has a good range of services and facilities. It is located close to the historic core of the settlement, near to Kingston Bapuize house. Development of this site could provide a relief road to the west of the existing settlement between the A420 and A415, relieving traffic pressures on the existing centre. Development could provide for a new primary school, community facilities and some retail provision adding to the existing services and facilities in the area. Development would need to have consideration of the setting of Kingston Bagpuize House, and seek to enhance this setting through careful masterplanning of the site. 	<p>Recommendation</p> <p>Site is not proposed for allocation</p>	<ul style="list-style-type: none"> Makes claim to be close to historic core of Kingston Bagpuize with Southmoor, ignoring the fact that the site is more remote from the real centre where most amenities are located. Much more remote than site 29 (KBAB_C) that is not proposed for allocation. New school reduced to possibility, not certainty. Ignores all negative factors and, as shown by the preceding comments, is quite simply wrong

Appendix B

2 photographs, from an almost identical position, showing the proposed development site



Why would anyone look north at an agricultural field when you can do an about turn and look south across open countryside to the distant Downs

