

Comments on Main Modifications to the VoWH DC Local Plan Part 2

Fyfield & Tubney Parish Council and FLAG

MM28 Appendix A: Site Development Templates, East of Kingston Bagpuize with Southmoor

We consider the proposed modification MM28 to be inadequate.

At the public examination of LPP2 we presented evidence that the cumulative impact of traffic from LPP2 developments, particularly the East of Kingston Bagpuize (LEKB) site, would be severe. This was heard by the VoWH DC to the extent that during the examination they proposed that no dwellings should be occupied before improvements were made to the A415/A338 junction at Frilford.

We also argued that the additional traffic through Marcham from LPP2 developments would have a substantial adverse impact on the Marcham Air Quality Management Area (AQMA).

Recent additional evidence

Our opinions are supported by the traffic and air quality assessments which accompany the planning application by Lioncourt Strategic Land, P18/V2791/O, for development of the LEKB site submitted to VoWH DC in November 2018.

Although the details of this planning application are not the subject of LPP2, the conclusions of both the traffic assessment and the air quality assessments are highly pertinent to its soundness. We discuss air quality assessments in a separate comment on the VoWH paper 'Additional Air Quality Evidence'. We note that the traffic assessment predicts a substantially greater flow of traffic through Marcham than our estimates suggested.

Since the planning application was submitted by the would-be developers of the site, the traffic and air quality assessments are – obviously – completely independent of any biases which we may have.

Access and Highways

The additional bullet point to be added to 'Access and Highways' is ambiguous and includes too much leeway. If it is unsound now to occupy the site while the Frilford Junction is a bottleneck, it will never be sound to do so. The apparent offer of flexibility in agreement with the Oxfordshire County Council is illogical and occupation should not be permitted until the necessary improvements to the local highway infrastructure are in place. The additional bullet point should therefore be revised to read as follows:

The occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction

The problems associated with increased traffic through Marcham village have not been addressed. The traffic assessments prepared by Key Traffic Consultants for the Lioncourt Planning Application indicate that by 2027 the number of vehicles per day passing through Marcham will have increased from 13,606 (in 2016) to 21,395 – an increase of nearly 8000, or 57 per cent. Marcham village is already a bottleneck, where no two large vehicles can pass each other at the pinch point. The failure to address this in the LPP2 renders it unsound given the scale of the proposed development at LEKB.

Further to the above, as addressed in our comment¹ (*q.v.*) on the VoWH paper 'Additional Air Quality Evidence'², the VoWH DC assessment of the impact on the Marcham AQMA is flawed because it is based

¹ Comment on the *Additional Air Quality Evidence* paper for VoWH Local Plan Part 2, Fyfield and Tubney Parish Council and FLAG, and appendices

on an underestimate of the additional traffic through the AQMA. The comprehensive assessment prepared by MEC consultants for the LEKB site promoters shows that there will be a substantial cumulative impact from LPP2 developments on the Marcham AQMA.

Only a by-pass will solve the traffic issues and the air quality problems in Marcham. A by-pass must therefore be incorporated into the LPP2 for it to be sound. In common sense terms, there is **no point in upgrading the Frilford Junction without a Marcham by-pass**. The VoWH DC recognises that a bypass is a priority, as is evident on page 11 of their paper on ‘Additional Air Quality Evidence’:

‘The VoWHDC are seeking to prioritise the delivery of this road [Marcham bypass] during the plan period and currently consider that there is a high degree of confidence this scheme will be delivered alongside the proposed developments at Dalton Barracks and East of Kingston Bagpuize with Southmoor.’

A bullet point should be added to the effect:

The occupation of dwellings on the site will not begin prior to the completion of the Marcham by-pass,

and Bullet 2, ‘Contribute towards infrastructure improvements....’ should be amended to include a contribution towards a Marcham bypass as well as Frilford Junction.

Size of the proposed allocation

The size of the development has not been addressed. The development template states:

‘Proposed Allocation: Around 600 dwellings, subject to masterplanning’

As indicated by the planning application submitted to the VoWH DC, the site promoter wishes to build 700 dwellings plus a 70-bed care home on the site. This is far in excess of ‘around 600’ and introduces further problems as identified by the VoWH DC Urban Design Officer, the Conservation Officer, and the Landscape Officer in their comments on the planning application. These concerns are echoed by the Oxford Clinical Commissioning Group, Thames Water, CPRE Oxfordshire, and Historic England. To be sound, the template should be modified as follows:

Proposed Allocation: Up to, but no more than, 600 dwellings, subject to masterplanning

Social and Community

The amended requirement relating to ‘Social and Community’ to ‘Provide, subject to viability, a new local centre adjacent to the primary school, located and designed to meet the needs of the expanded village’ should be further amended to remove the words ‘subject to viability’. Building 600 houses without adding a local centre is not sound. Furthermore, the developer’s contribution to the infrastructure cost of a local centre should be secured by a bond or by funds held in escrow. The requirement should therefore be:

Provide a new local centre adjacent to the primary school, located and designed to meet the needs of the expanded village, with an appropriate contribution from the developer to the infrastructure cost secured by a bond or funds held in escrow.

Other comments

Although the planning application submitted to the VoWH DC is not relevant to the soundness of LPP2, some of the comments made by significant stakeholders should nevertheless influence the discussion of the Main Modifications:

² VoWH DC Local Plan 2031: Part 2 Evidence Base – Cumulative Impact of Planned Growth on the Air Quality Management Areas

Oxfordshire County Council considered the application premature and that further studies be carried out before it could be determined. The VoWHDC concurred and the application is currently on hold pending further assessments of current and predicted traffic flows. This is something that the PC and FLAG have long argued for. The following comments from the OCC are particularly pertinent:

'The district planning authority should take into account the whole impact of the proposed development on the county infrastructure, and the lack of mitigation in making its decision.'
[L.Hughes, Sr Planner]

'I require the base line traffic flows all to be updated, so we are as informed as possible about the current conditions of the highway network.' [Kt Hamer, Sr Transport Planner]

Further objections from the Oxford Clinical Commissioning group, Thames Water, CPRE and Historic England all question the proposed development. Even VoWHDC Officers commented adversely, particularly the Environmental Health Officer who has put in a holding objection on air quality grounds until a suitable mitigation scheme could be signed off as effective and deliverable by Highways England – in other words a Marcham by-pass.

Conclusions

In conclusion, for LPP2 to be sound, the Main Modifications should indicate:

- **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**