

Planning

HEAD OF SERVICE : **Adrian Duffield**



CONSULTATION WITH FYFIELD AND TUBNEY PARISH COUNCIL

**PLEASE RETURN TO VOWH NOT LATER
THAN 12 NOON ON 7 DECEMBER 2018**

OFFICER: **Stuart Walker**

Planning@whitehorsedc.gov.uk
Tel : 01235 422600
Textphone: 18001 01235 422600

135 Eastern Avenue Milton Park
ABINGDON OX14 4SB

Application Reference: P18/V2791/O (Outline)

Application Type (see definition over): Major

Proposal: A hybrid planning application comprising:

- 1) an outline planning permission, with all matters reserved except for access, for development of up to 700 homes (use class C3) extra care development of up to 70 units (use class C2), a local centre of up to 0.5ha (use classes A1, A2, A3, A4, A5, B1(a), C2, and D2) a one form entry primary school on an area for education provision of up to 2.2ha, playing field and car parking, informal open space, landscape and sustainable drainage areas, access, footpaths, cycle ways, infrastructure and associated engineering works (including a noise attenuation bund and acoustic fence) and
- 2) a full planning permission for construction of a three arm roundabout to the A420 (Oxford Road).

Address: Land East of Kingston Bagpuize

FYFIELD AND TUBNEY PARISH COUNCIL:

FULLY SUPPORTS this application for the following reasons

has **NO OBJECTIONS** to this application

has **NO OBJECTIONS** to this application but wish the following comments to be taken into account :

OBJECTS to this application for the following reasons :

If you have a current Parish Plan does it support your view on this application?

If so, please give details of the relevant section below:

~~YES~~/NO
(Please circle)

.....
S. Lucas 7/12/18
.....

Signed on behalf of Fyfield And Tubney Parish Council

P18/V2791/O

A hybrid planning application comprising: 1) an outline planning permission, with all matters reserved except for access, for development of up to 700 homes (use class C3) extra care development of up to 70 units (use class C2), a local centre of up to 0.5ha (use classes A1, A2, A3, A4, A5, B1(a), C2, and D2) a one form entry primary school on an area for education provision of up to 2.2ha, playing field and car parking, informal open space, landscape and sustainable drainage areas, access, footpaths, cycle ways, infrastructure and associated engineering works (including a noise attenuation bund and acoustic fence) and 2) a full planning permission for construction of a three arm roundabout to the A420 (Oxford Road).

The Fyfield and Tubney Parish Council and the residents of the parish are united in total opposition to the Lioncourt application (see the petition signed by 310 people and submitted on 21st November 2017 as part of our response to the Publication version of Local Plan Part 2).

We respond to this consultation under protest. As we told the Chairman of the District Council in our letter of the 21st November, we and other consultees have to respond to this application without knowing what the eventual planning environment will be. In the circumstances we are responding on the basis of the current planning context, in which LPP1 has been adopted and the Inspector has yet to comment on the proposed allocation of 600 dwellings on the Fyfield site described as 'Land East of Kingston Bagpuize' (LEKB). The arguments we put forward to the Examination are still valid, and we reference our submissions on the Publication version of LPP2 below as an integral part of this response. If the planning environment changes because the Inspector releases his findings on the allocation of the site before the Lioncourt application is determined, we should expect to be given the opportunity to review and, if necessary, revise our objection to the planning application.

Our objection to the application is based on the following key points:

1. The proposed development would create an overblown car-dependent suburban commuter dormitory which is out of keeping with the rural nature of the parish in whose land it lies, and would add to the massive over-development of the larger village of Kingston Bagpuize to which it would become attached. Traffic from the development would add significantly to congestion on local roads.
2. The application is premature. The allocation of the site proposed in Part 2 of the Local Plan was not among the issues which the Inspector found sound in his letter of the 30th October. Therefore it should not be considered until Part 2 has been adopted. The Leader of the District Council confirmed as much in an email to the Fyfield & Tubney Parish Council. The County Council have indicated that they expect to oppose it because it is premature.
3. The application is inconsistent with paragraph 49 of the new NPPF which recognises that predetermining large schemes which are central to the making of new plans before such plans have been approved would undermine the plan-making process.

4. The application is incompatible with current planning policies and is inconsistent with the spatial strategy and settlement hierarchy of Part 1 of the Local Plan (see our submissions on LPP2 as well as those of others).
5. The application is disingenuous. It fails to acknowledge the draft major modification already tabled in the LPP2 making it clear that the County Council and District Council will not permit occupation of houses on the site until major improvements have been made to the Frilford road junction, currently expected to be in 2024/25. The assumption in the application that there could be several hundred house completions by then is inappropriate.
6. The development phasing described in para 3.9 of the Environmental Statement is deliberately omitted from the Design and Access Statement (DAS). In fact, the applicant subsequently removed a reference to phasing from the DAS when this was challenged. For cash flow and viability reasons it proposes that the A420 roundabout and the primary school should be completed only at the same time as the 301st and the 401st dwellings respectively. Both would be unacceptable. If the site were to be developed the roundabout should be completed at the outset to avoid excess pressure on the A415, and the school would be needed to meet demand from the first tranche of houses.

Furthermore, the application fails to specify the triggers which will unlock each phase of the development. There are no guarantees in place to prevent the development from stalling after Phase 1. The rate of completion is also somewhat arbitrary. Previously, the development was expected to proceed at 100 dwellings per year but the Application suggests only 80 per year. Such a lack of clarity is unacceptable.

7. Growth in Kingston Bagpuize has been inadequately controlled. New-build and approvals have already taken it from 915 in 2011 to 1700 (including the allocation of 280 found 'appropriate to a larger village' by the Inspector for LPP1). This proposed development would take the total to 2400 – an increase of 160%. That is not 'sustaining' a larger village; it is utterly altering its character.
8. The application claims consistency with the emerging Local Plan, but is a huge and unacceptable increase over the 600 houses proposed in the plan for allocation. The District Council did not seek endorsement for an increase over 600 houses in their presentations to the Inspector at the Examination of Part 2 of the plan.
9. The increase in the number of dwellings from 600 to 700 on the grounds that this will deliver more affordable houses is questionable. We infer, rather, that with only 600 houses the site is not viable.

The addition of a 70-bed care home classified as C2 and not C3 also suggests that the site promoters intend to reduce the number of affordable dwellings elsewhere in the development should they need to in order to ensure viability.

10. The impact of the development on the villages of Fyfield and Tubney is contrary to good planning practice. The conservation area will be urbanised by its proximity to a roundabout, street lighting and increased traffic flow with attendant noise and exhaust

fumes. The additional traffic on the A420 will have a severe impact on the roadside settlement of Tubney and will make access even more difficult and hazardous.

11. Development on the site, which is remote from centres of employment and served by inadequate public transport, is contrary to the District Council's stated policies of reducing the need to travel and encouraging a modal shift in means of transport away from use of private vehicles.
12. The traffic analysis accompanying the application confirms our contention that the combined effect on the local highway network of this and other developments would be severe. Whilst we believe that the applicant's analysis may underestimate some local effects (in particular by the way that the Bloor Homes development of 280 houses at Kingston Bagpuize, contiguous with the LEKB site, is treated, and the unrealistically small fraction of HGVs assumed on the A420) the overall picture is unambiguous and inescapable: by 2026 the traffic on the A420 will have increased by 30 percent or more, and by over 65 percent on the A415 through Marcham.

The effects of these increases in traffic downstream at the A420/A34 junction at Botley, and the A415/A34 junction at Abingdon have yet to be assessed. However, the **District** Council and the County Council acknowledge that there will be severe and growing problems at the Frilford staggered interchange and consequently tabled the amendment to Part 2 of the Local Plan that no dwellings at LEKB should be occupied before the problems at Frilford are satisfactorily resolved.

The impact of 'rat-running' via minor roads in the Kingston Bagpuize and Fyfield area does not seem to have been considered in the traffic analysis and remains a serious concern.

13. The Air Quality Action Level (AQAL) of pollutants is already regularly exceeded in Marcham. The applicant's air quality study shows that by completion of the LEKB site the level of pollutants for some receptors in Marcham would have increased to 144 percent of the AQAL; the development at LEKB would contribute approximately one fifth of this increase. We previously estimated that a development of 700 houses at LEKB would, in terms of air quality, be the equivalent to the construction of 300 or more houses in Marcham. We note, again, that an allocation of 430 houses at a site on the east of Marcham was withdrawn at the consultation phase of LPP2 on grounds of the effect of their associated traffic on air quality.

The consultants acting for the developers propose that the solution to the problem of air quality in Marcham would be to impose a weight limit on traffic through Marcham and re-route HGVs via the section of Farringdon [sic] Road that connects the A338 Oxford Road and A415 Marcham Road [to the east of Marcham]. This is a minor road in poor condition and hardly fit for the peak hour traffic which it already carries; it would also become an important access route for any development at Dalton Barracks. We regard this suggestion as ludicrous and contend that there should be a moratorium on further development in the Fyfield & Tubney area until such time as a Marcham bypass is built.

14. The land on which the development would take place is good farming land (BMV agricultural grades 2 and 3a) in a parish classified as open countryside. To claim that it is acceptable because of its proximity to an existing settlement (because of a new

development only now under construction) is to condone creeping coalescence and the destruction of appropriate gaps between settlements.

15. The application's description of the consultative process is utterly misleading. It nowhere acknowledges the hostile reception which the proposed development has had in most if not all the public presentations and discussions with concerned parties.

In conclusion: the application is premature, it lacks detail of development phasing and triggers, and the development is of questionable viability without the increase in the number of dwellings and the C2 care-home add-on. The District Council should not consider it until the Marcham by-pass and Frilford Junction improvement have been fully costed and committed and, most importantly, without receipt of the LPP2 Inspector's Report and the adoption of Part 2 of the Local Plan.

REFERENCES

The hyperlinks reference the original documents.

F&T PC Representations to LPP2 (November 2017)

[Representations](#)

F&T PC Submissions to LPP2 Examination: Matter 4 Abingdon & Oxford Fringe Area (July 2018)

[Submissions](#)

Material submitted during the hearing:

Note to Inspector on revised trajectory for LEKB: HEAR04.1.1 F&T PC comments on HEAR04.1

[Revised trajectory](#)

FLAG response to VOWH Air Quality note, HEAR04.5

[Air quality](#)