

From: Chris Neil MBE, Chair Clifton Hampden and Burcot Parish Council

To: SODC Planning by email: planning@southandvale.gov.uk

CC: Sue Lawson, District Councillor

22 May 2017

SODC LOCAL PLAN 2032 SECOND PREFERRED OPTIONS – RESPONSE

Thank you for the opportunity to comment on the SODC Local Plan 2032 (Second Preferred Options).

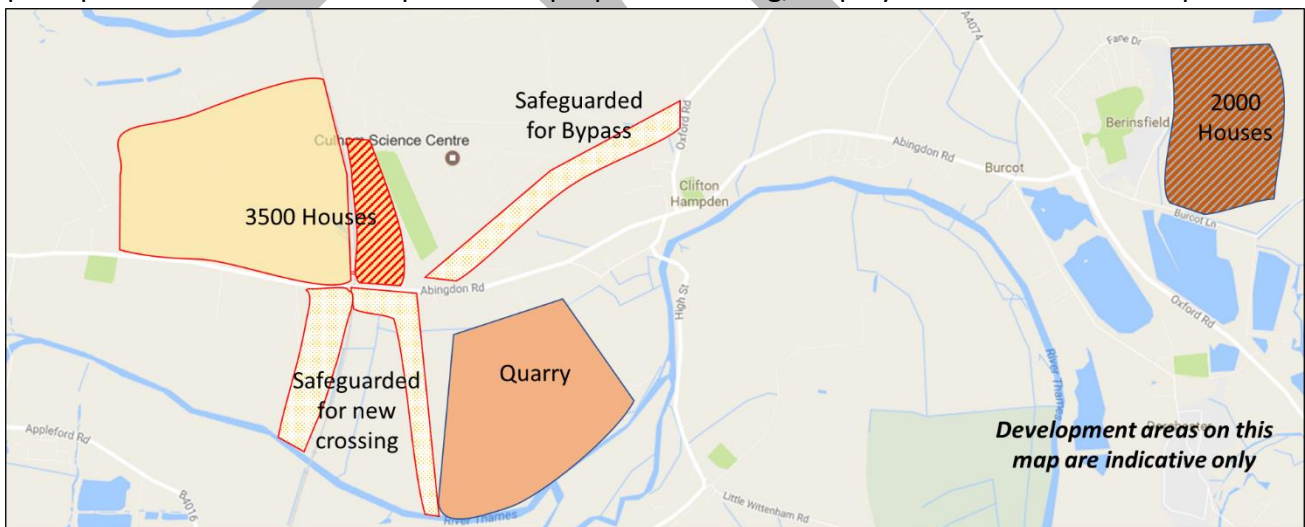
Unless otherwise stated the comments included in this response refer to the proposals for housing and employment at Culham and Berinsfield, the Clifton Hampden bypass, and the new river crossing.

OVERVIEW

The proposal to develop a total of 5600 houses at Berinsfield (2100) and Culham (3500) less than a mile from Clifton Hampden and in the Oxford Green Belt is counter to the reasons behind the creation of the Green Belt, namely to prevent urban sprawl, especially the ribbon development along roads, which destroyed so much of the countryside and so many of the villages within it during the 1930s. The basic purposes of Green Belts have remained unchanged. They are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

We argue that the proposal to develop Culham, with its close proximity to Abingdon and Clifton Hampden, is urban ribbon development of rural land, directly contradicting all four of these principles. The cumulative impact of the proposed housing, employment and road developments is



Cumulative Impact on Burcot and Clifton Hampden

shown on the illustrative map above centred around Clifton Hampden. The scale of the new development would be equivalent to adding a new town within the Green Belt.

We are concerned that the proposal to develop housing on the new strategic and No1 sites at Culham represents an existential threat to this village, its surrounding landscape and its valuable amenities, namely school¹, surgery and shop/post office which are so central to its character, and which will be unsustainable as new amenities created to make the new town sustainable, whether it be 3500 or 750 houses, will dwarf ours in the village and make them redundant.

We challenge the basis of SODC's housing need upon which the Local Plan is based. SODC justify above their objectively assessed need requirement (OAN) housing target on the basis of a legal obligation to contribute to meeting Oxford's housing need, and to protect areas outside the Green Belt from speculative development due to the lack of a 5 year land supply. The latter is impacted by the low rate of house building, suggesting that demand is not as high as argued. It is illogical, unsustainable and counter to NPPF to create new strategic sites in the Green Belt in order to protect the (non) Green Belt, particularly when SODC has the option of reducing housing targets if they are constrained by factors such as Green Belt and Areas of Outstanding Natural Beauty. Indeed other councils with these constraints such as Brighton & Hove have reduced their OAN accordingly.

We support the need to regenerate Berinsfield, and consequently inseting land from the Green Belt for this purpose may meet the 'exceptional circumstances' criteria for Green Belt development as set out in NPPF. However we have concerns about the traffic impact of this development on our village, and would need to see more detail on how this will be addressed as an integral part of the scheme.

We strongly support the provision of a new river crossing and Clifton Hampden bypass, but these are needed to relieve existing pressures on the local road and bridge network, which is already over-capacity, and new pressures that will be brought about by Didcot expansion and growth of employment at the Science Centre already agreed. They should be justified by and funded in whole or part through these schemes, not used as a justification for the development of Culham. We have some concerns over the proposed alignments.

We suggest the alternatives to housing provision at Culham are either to allocate a new strategic site outside the Green Belt such as proposed at Harrington, or at Grenoble Road (albeit within the Green Belt but an extension of the city's existing built boundary rather than a new town). SODC should reduce the Housing Target if they cannot find suitable sites because of the restrictions of the Green Belt and AONB in the district.

We ask SODC to also note the housing proposal within our village that is emerging from our developing Neighbourhood Plan, namely for 30-50 smaller houses for, new residents, downsizing residents, local workers, together with a new surgery, community centre and associated parking, and new footpaths and cycle-paths. We are concerned the scale of development proposed at Culham and Berinsfield will render our plan irrelevant and jeopardise our amenities. We call on SODC to honour the commitment made by John Cotton² to listen to, and work very closely with the communities and villages that may be affected by this plan. We trust you will give this response due weight.

¹ Which is federated with the school in Culham with a single executive head teacher

² Leader SODC, at the Plan Launch at Didcot in March 2017

DETAIL

Housing Need. The housing targets are ambitious and exceed the targets set in the SHMA. Whilst they will satisfy the requirement to have a five-year land supply we are concerned that the building targets are unachievable. If every local council in Oxfordshire has ambitions to realise their housing targets then there will not be enough capacity within the building trades and resources to satisfy the requirement. Furthermore, as the housing developments will be undertaken by private developers then the speed of construction will be market driven. It is not in a developer's interest to speed up delivery and flood the market with new houses, as this could result in price depreciation. We are therefore concerned that the setting of ambitious targets cannot be realistically delivered. Ergo, the allocation of large sites within the green belt is unjustified. The alternative is to allocate additional sites outside the Green Belt such as Harrington, or reduce housing targets below SHMA as has been done by councils elsewhere³.

Traffic. We are concerned about the cumulative impact of the growth of traffic due to developments at Didcot, Milton Park and Sutton Courtenay and CSC Employment growth on a road and bridge network already above capacity. The OCC Highways team have themselves expressed concerns that the macro level traffic modelling cited to inform the proposals do not address the micro issues of traffic through Clifton Hampden, Long Wittenham, Sutton Courtenay, across the existing bridges, and through into Abingdon and Nuneham Courtney. The proposed infrastructure improvements, namely a new river crossing and Clifton Hampden bypass are needed, and should be funded, by the need to mitigate the impact of existing traffic and growth from Didcot, Berinsfield and CSC employment, and should be in place before any development is permitted to start. Notwithstanding our objection to the 750 houses on No1 site, we are concerned that this development should be permitted without a new river crossing or bypass being in place.

Cyclepaths and Footpaths. The provision of a footpath and cycle-path network that is fit for purpose can make a significant contribution to reducing traffic and increasing health and wellbeing. We welcome the provision in the plan in STRAT 7 to deliver cycle and pedestrian access at the Culham Science Centre with nearby communities. We are concerned that land is safeguarded for improvements to the cycle-path network and suggest that the following are included within the Plan:

- CSC to Didcot, parallel to the alignment of the new river crossing between CSC and Didcot, and included in the bridge design.
- Berinsfield to CSC. Improvements to the existing cycle-path through Burcot and Clifton Hampden.
- CSC to Abingdon. Improvements to the existing cycle-path through Culham
- Clifton Hampden to Nuneham Courtney and through to Oxford. A new cyclepath joining existing path from CH to CSC, providing a direct path from Oxford to CSC
- Clifton Hampden to Long Wittenham.

³ <https://www.thetimes.co.uk/article/councils-ignore-powers-to-limit-housebuilding-on-the-green-belt-0ks5hmn9w?shareToken=21fa0c8210b3764b75790c3429d90985>

Rail Transport. We support the proposed improvements in rail services to Culham however enabled, but are concerned that there is no firm undertaking or funding from Network Rail to make them happen. Without prejudice to our objection to the proposal for 3500 houses at Culham, we are concerned that development should not proceed without the improvements in rail service. Any development prior to the improvement in rail services would undermine the justification for the selection of Culham as a strategic site due to its proximity to the railway station.

Bus Transport. There is no Bus service on the A415. We are concerned that this measure to reduce traffic should be included as a condition within the Plan prior to development starting at Berinsfield, or employment opportunities being increased at CSC. Firm commitments should be sought from the bus companies with associated target dates that services will be provided. A new service from Didcot to CSC/Oxford through Clifton Hampden should be considered once the new river crossing is in place.

Culham Strategic Site (3500 Houses). We are concerned that the proposal to develop [hectares] on a new strategic site in the Green Belt at Culham purely for housing, and to generate funding towards a new crossing of the River Thames⁴ does not meet the NPPF 'exceptional circumstances' criteria. We are concerned of the threat that the creation of a new town and its associated amenities, with a population of more than 8000, i.e. larger than Wallingford, within a mile of Clifton Hampden to the east and two miles of Abingdon to the west, will presents to the sustainability of the highly valued amenities that characterise this historic village, namely school, surgery and shop. The proximity to the rail station with improved rail services ironically makes the location an attractive proposition for London commuters, creating a dormitory town. We note that the creation of a dormitory town has been cited as the principal objection to the Harrington New Settlement proposal which is not in the Green Belt. Even if the proposed road infrastructure and transport improvements are in place, the loss of agricultural land, natural habitat, the threat to the individual and unique character of Clifton Hampden are counter to PPG2.

We do not endorse the proposal for 750 houses to be built ahead of any infrastructure development. Even this number of houses with the amenities that will be required to make them sustainable, will represent an existential threat to the Clifton Hampden school, surgery, and shop dependent on them for trade even if the road and transport improvements are in place. It will become a dormitory community for London.

Culham No1 Site (Included within the new Strategic Site). We are concerned that the allocation of some of the houses proposed at Culham will be allocated to the No 1 site. We are concerned about the loss of employment land, which runs counter to the Employment policies in the LP, and that once inset, housing development will become developer rather than plan led. Without prejudice to our objection, we are also concerned that the proposal is to inset the Green Belt with consequential control handed to the developer, rather than treat as the redevelopment of a brown field site within the Green Belt which we suggest would be more appropriate, and subject to specific policy control to be developed under this Local Plan or Culham Neighbourhood Plan (should one be written). We

⁴ Citing John Cotton at the Plan Launch Meeting at Didcot, stating explicitly that the selection if the site was in part driven by the need to fund the new crossing.

suggest Harrington New Settlement/Grenoble Road are better alternative sites for a large growth in housing. Alternatively we are willing to consider a much reduced allocation of 100-200 houses that will support enhanced school⁵ and surgery amenities within Clifton Hampden village, and addressing this within the Clifton Hampden Neighbourhood Plan.

Berinsfield Regeneration. We support, in principle, the proposed regeneration of Berinsfield, and that this proposal may amount to the ‘exceptional circumstances’ for development in the Green Belt, but are concerned that the impact of the increased traffic along the A415 through Clifton Hampden have been ignored. We have conducted our own traffic survey⁶ at the Berinsfield roundabout which revealed that approximately 40% of the traffic leaving Berinsfield travelled along the A415 toward Clifton Hampden, and not north/south along the A415 as argued in the consultation. We suggest that the Clifton Hampden bypass, together with traffic calming measures through Clifton Hampden/Burcot, are included as an integral part of the scheme.

New River Crossing. We support the proposed river crossing, but are concerned that its justification and funding are being linked to new employment and housing at Culham. Infrastructure improvements are needed, and should be funded, by the need to mitigate the impact of existing traffic and growth from Didcot and Berinsfield. We have concerns about the proposed eastern alignment which passes through the hamlet of Fullamoor, and wish to register our concern that this is the first time we have been formally consulted on the alignment options. We are concerned that OCC have previously consulted with Hills Quarry Products who have applied for planning permission for a quarry to the east of the railway line. We are concerned that the eastern alignment has been influenced by the boundary of the proposed quarry, at the expense of the residents of the Fullamoor hamlet, and that the route should have been taken through the area of the proposed quarry site. We would like the eastern alignment to be reconsidered. Despite this concern, we suggest the western alignment is more sustainable and should be the preferred option. We request that the safeguarded land map is adjusted accordingly and only one route is taken forward into the LP.

Clifton Hampden Bypass. We support the proposed bypass, but argue similarly that it is needed to mitigate existing traffic pressures, as well as the future impact of any Berinsfield regeneration, and should be included as an integral part of this scheme. We are concerned that the proposed alignment passes too close to the north west corner of Clifton Hampden village threatening the quality of life of residents in Courtiers Green, and should be moved to take a wider arc, if necessary encroaching onto CSC brown field land, thereby maintaining appropriate green space and set back.

Quarry Application

SODC are fully aware of and have made representation to Oxfordshire County Council regarding the outstanding planning application for a Gravel Extraction Quarry and associated Concrete Works in Clifton Hampden. Should the application be granted it will have a major impact on the transport infrastructure in the area and in particular the junction in Clifton Hampden village, with a major detrimental impact on our community. We are concerned that there is no reference to this application in the plan or SODC’s objection to it. We are concerned that there is no recognition within

⁵ Noting that Clifton Hampden and Culham primary schools are now federated.

⁶ Conducted on 4 separate days in April 2017

the Plan of the effect it will have on the proposed developments or the cumulative effects on those communities in the immediate area of the proposals within the plan. Indeed it may be seen by readers of the plan that the quarry is ideally located for the proposed developments at Culham, contrary to SODC's response to OCC regarding the quarry.

CSC Employment. We support the proposed increase of employment opportunities at CSC, but are concerned that the proposed re-allocation of the No1 site for housing reduces employment land and therefore employment opportunities. We are also concerned about the increase in traffic to and from the site. We therefore suggest retaining No1 Site for employment land as an alternative to proposed housing, and that it further justifies the need for a river crossing and Clifton Hampden bypass. We are concerned that a previous agreement to consult the CH Parish Council on changes to the CSC Master Plan in return for CSC being removed from the NP area has not been honoured. We are concerned that the proposed CSC development of the front apron contained within the masterplan will urbanise the area in a way that is not consistent with the principles of the Green Belt. We suggest that policies for the development of CSC to prevent urbanisation and ensure it is plan led are included within the Local Plan.

GENERAL COMMENTS

There is a tendency within the document and the supporting evidence to assume that the Culham Science Centre is in Culham Parish. This is not the case and the majority of the site is situated within Clifton Hampden Parish.

There are references to the Culham Science Centre Masterplan. We were led to believe the masterplan for the site has not yet been adopted by the council. We remind the Council that there is an agreement in place that in return for this Parish Council excluding the Culham Science Centre from our Neighbourhood Development Plan Area we would be kept fully involved in the planning for CSC and consulted on any developments regarding the Masterplan for the site.

Chris Neil MBE

Chair, Clifton Hampden and Burcot Parish Council

22 May 2017