



**Brize Norton Parish Council Response to
The West Oxfordshire Consultation on the
Pre-Submission Draft Local Plan (May 2015)**

Date:

May 2015

Author:

Brize Norton Parish Council (BNPC)



Executive Summary

BNPC has carefully reviewed the Local Plan, in particular the components relating to the Carterton Sub-Area within which the village sits. BNPC has structured its review and report in accordance with the Guidance Note published on the WODC website and we consider that:

The proposed Local Plan is NOT legally compliant in that:

- The Sustainability Appraisal Report is **FLAWED** and is not fit for purpose – see Section 2.4 of this report.
- The Sustainable Community Strategy has **NOT** been well publicised, if it has been publicised at all – see Section 2.5 of this report.

The proposed Local Plan is **UN SOUND** on at least six counts:

- The quantum of housing proposed is too high and therefore **UNJUSTIFIED** and **INEFFECTIVE** – see Section 4.1 of this report.
- The focus of development on three service centres is **UNJUSTIFIED** on the grounds that Witney and Carterton are so close together (less than 6 miles from centre to centre) that they should be considered as a single service centre – see Section 4.2 of this report.
- Carterton Sub-Area Strategy is **UNREALISTIC** on the grounds that the delivery of 2,600 homes and the need for an additional 10 ha of quality business land over the Plan period far exceeds the opportunity for local employment growth.
- The emerging master plan for Carterton, commissioned by Carterton Town Council, is being prepared in isolation from the rest of the Local Plan and without consultation with the neighbouring councils, it should therefore be specifically **EXCLUDED** from the Local Plan – see Section 4.3 of this report.
- The proposed Local Plan does not meet its Core Objectives for promoting safe, vibrant and prosperous town and village centres; and will **FAIL** to deliver sustainable economic growth – see Section 4.4 of this report.
- The proposed Local Plan does **NOT** meet the Transport Related Core Objective of ensuring that land is not released for new development until the supporting infrastructure and facilities are secured – see Section 4.5 of this report.

Based on the above BNPC believes that the proposed Local Plan, if adopted:

- Will not adequately protect the predominantly rural nature of West Oxfordshire;
- Will result in the District becoming the dormitory for the new employment centres in Oxford and the Oxford Science Vale, more than 15 miles away and on the other side of the river Thames, which only has three single lane bridges over it;
- Will result in the number of people travelling to work by car in West Oxfordshire continuing to increase, the distance people travel to work continuing to increase and the time spent commuting in their cars continuing to increase;
- Will not meet the NPPF's focus on sustainability and will be in direct contravention of the government's Agenda on Climate Change.



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1. Introduction

- 1.1. This document has been prepared by BNPC in response to the WODC consultation on the pre-submission draft of its Local Plan to 2031 "*West Oxfordshire Local Plan 2013*".
- 1.2. In reviewing the draft Local Plan, BNPC has been mindful that this is a 'Pre-submission Consultation' and has used the "*Guidance Note for Responding to Local Plan Consultation*" (the Guidance Note) provided on the WODC website as the basis for this response. The document is therefore structured to address the three main questions that will, in due course, be examined by the Planning Inspector, namely:
 - Has the Plan been prepared in accordance with legal and procedural requirements?
 - Has the Plan been prepared in accordance with the duty to co-operate?
 - Is the Plan 'sound' (i.e. positively prepared, justified, effective and consistent with national policy)?
- 1.3. As such this document follows the layout of the WODC guidelines and responds to the above questions in order.
- 1.4. It should be noted that the volume of supporting documentation provided by WODC, the time over which the Local Plan has been developed (more than 5 years) and the 6 week consultation period means that BNPC, which has no full time staff, has been unable to review all the available data. The BNPC response is therefore focussed primarily on its location, part of the Carterton Sub-Area, using the substantial body of information that BNPC has become familiar with over the last five years, in particular:
 - The West Oxfordshire Local Plan 2031 (April 2015);
 - Pre-Submission Draft Local Plan Sustainability Appraisal - Non-Technical Summary (Feb 2015);
 - The Infrastructure Delivery Plan (Feb 2015);
 - The Site Assessment Matrix (June 2014);
 - The Focussed Consultation Sustainability Report (July 2014);
 - The SHMA (May 2014).
- 1.5. In addition BNPC has reviewed its previous responses to the Draft Local Plan in December 2012 and to subsequent comments and reports on the proposed Bloor Homes/Christ Church planning application 14/0091/P/OP. We have concluded that these reports and responses are still valid in terms of the current 'Pre-submission Consultation'.
- 1.6. The BNPC conclusions following this review can be summarised as follows:
 - The Plan has been prepared in accordance with some, but not all, of the legal and procedural requirements as listed in paragraph 2.2 of the Guidance Note
 - In so far as BNPC is able to comment the Plan has been prepared in accordance with the duty to co-operate, although it should be noted that the period over which the Local Plan has been developed, the volume of supporting documentation produced and the limited time available to the public and local councils to respond (outside of working hours) means, inevitably, that local issues may not be properly addressed in the process.



- The Plan is NOT ‘sound’ (i.e. positively prepared, justified, effective and consistent with national policy) in three main areas – Employment, Transport Infrastructure and Housing Needs.
- 1.7. West Oxfordshire is a rural district because of two facts:
- There are no mineral or business requirements to support industrial development
 - There is no transport infrastructure to support significant development other than small rural businesses
- 1.8. Given the facts above, the proposed housing target in the Local Plan of 525 houses per year, which is 74% more than the previous target, and with NO CHANGE in employment opportunities, and NO significant infrastructure improvement means that the Local Plan will result in OVER development and UNSUSTAINABLE life styles for residents in the District.
- 1.9. To be able to support the level of housing development proposed in the Local Plan, there must be a commensurate amount of employment growth and infrastructure, in particular transport, improvement. There are no significant opportunities for either employment growth or transport infrastructure improvements in the Local Plan.
- 1.10. The projected growth is to rely on making “employment” land available for use and making minor modifications to a single trunk road designed in the 1960s for traffic volumes that were exceeded in the 1980s and that is no longer fit for purpose. Neither of these strategies have provided economic stimulus in the past and they are therefore unlikely to work in the future.
- 1.11. The NPPF does not, in any way, promote OVER development of housing and UNDER development of infrastructure and therefore the Local Plan is UNSOUND.



2. Legal Compliance

2.1. Local Development Scheme

“The Local Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the LPA proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations. The LDS should be on the LPA’s website and available at its main offices.”

2.1.1. WODC have a Local Development Framework, which includes the LDS. The LDS is published on the WODC website and includes the Local Plan.

2.1.2. BNPC conclude that the Local Plan complies with the above requirement.

2.2. Community Involvement

“The process of community involvement for the Local Plan should be in general accordance with the LPA’s Statement of Community Involvement (SCI). The SCI sets out the LPA’s strategy for involving the community in the preparation and revision of LDDs (including Plans) and the consideration of planning applications.”

2.2.1. WODC have a Statement of Community Involvement which was updated in December 2014.

2.2.2. BNPC conclude that the Local Plan complies with the above requirement.

2.3. Compliance with the Town and Country Planning Regulations 2012

“The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the LPA must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The LPA must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.”

2.3.1. BNPC is not in a position to ascertain as to whether WODC is compliant with the above requirement.

2.4. Sustainability Appraisal Report

“The LPA is required to provide a Sustainability Appraisal Report when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.”

2.4.1. WODC has prepared a detailed Sustainable Appraisal Report and has also published a “Local Plan Sustainability Appraisal – Non-Technical Summary (Feb 2015)”. WODC



therefore complies with this requirement, however BNPC considers that the Sustainability Appraisal is fundamentally flawed in at least two key areas:

- The Sustainability Appraisal contains no consistent employment statistics and therefore does not objectively assess the trends associated with historical changes in employment, commuting and house ownership. Sustainable development requires housing to be delivered where employment opportunities dictate such that commuting by car is minimised. Without an understanding of historical trends associated with employment and commuting there can be no real Sustainability Appraisal associated with the Local Plan.
- The Sustainability Appraisal concludes that most new development should take place in the three main service centres of Witney, Carterton and Chipping Norton. In reaching this conclusion it does not recognise that the centre of Carterton is 5.7 miles from the centre of Witney therefore the residents in both towns use the services of each one; retailers/employers will base themselves in one place or the other, not both. Consequently Carterton cannot compete with Witney as a full service centre. In reality West Oxfordshire is a rural district with only two real service centres.

2.4.2. BNPC therefore believe that although WODC have prepared a Sustainability Appraisal the flaws within it mean that it is not appropriate for the Local Plan and therefore this legal requirement has NOT been met.

2.5. Sustainable Community Strategy

“The Plan must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA’s area. The SCS is subject to consultation but not to an independent examination.

2.5.1. BNPC is not aware of any Sustainable Community Strategy per se and therefore do NOT believe that this requirement has been met.



3. Duty to Co-Operate

“The duty to co-operate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from the duty.”

3.1. BNPC is not in a position to be able to comment on this requirement.



4. Soundness

4.1. Providing New Homes:

BNPC believes that Policies H1 – *Amount and Distribution of Housing* and H2 – *Delivery of New Homes* are UNSOUND on the grounds that the housing figures proposed are too high and therefore UNJUSTIFIED and INEFFECTIVE. We also believe they are not consistent with national policy.

4.1.1. BNPC do NOT agree that the Local Plan housing target over the Plan Period should be 525 homes per annum.

4.1.2. The data presented in the Local Plan and its supporting documents shows:

- The increase in households over the period 2001 – 2011 (496 per annum) is a 47% increase in households over the previous 10 years (337 per annum over the period 1991 – 2001).
- This dramatic increase was the result of the known over delivery rates of housing developments such as Shilton Park, Carterton.
- The over delivery of housing over the period 2001 – 2011 has NOT created any additional local employment opportunities, instead it has led to: *“The number of people travelling to work by car has increased and the distance people travel to work has increased. The District has several congestion problems. The A40 between Witney and Oxford is seen as one of the County’s worst congestion problem.”* (Statement S7, Table 2; *Local Plan Sustainability Appraisal – Non-Technical Summary (Feb 2015)*).
- The household delivery rates over the 2001 – 2011 period (496 per annum) are clearly unsustainable and to increase this already unsustainable target by a further 5% shows NO recognition of reality and is therefore BAD planning.

4.1.3. BNPC is concerned that none of the supporting documentation, in particular:

- The SHMA;
- The Site Assessment Matrix (June 2014);
- The Focussed Consultation Sustainability Report (July 2014);
- The West Oxfordshire Local Plan – Housing Consultation (July 2014);
- Pre-Submission Draft Local Plan Sustainability Appraisal - Non-Technical Summary (Feb 2015);
- The West Oxfordshire Local Plan 2031 (April 2015);

present any historical data, or trends, on:

- Actual changes in operating businesses and the employment arising from them within West Oxfordshire.
- The amount of out-commuting from West Oxfordshire that keeps unemployment low, but leads to poor work/life balances and an ever increasing dependence on the car.



- The proportion of houses in West Oxfordshire that are second or week-end homes.
 - The effects that the latter two bullet points have on driving house prices in West Oxfordshire to above average levels.
- 4.1.4. It is the changes in employment opportunities for work inside West Oxfordshire that should be driving the housing needs, not the misinterpretation that low unemployment rates, high house prices (driven by the marked increase in second homes) and low unemployment (because of the amount of out-commuting) means that there is a need to build more houses in the district at a faster rate than have been built in the past.
- 4.1.5. The employment data provided in the Local Plan is inconsistent and therefore provides no clear picture of employment, working and community trends within the District. For example:
- Paragraph 9.2.7 of the Local Plan states: *The Witney sub-area plays an important economic role containing around 35% of the District's employment opportunities (almost 15,000 jobs).*
 - Paragraph 9.3.5 of the Local Plan states: *Carterton has 24% of the District's economically active population compared with just 13% of the District's employment. Witney by contrast only accounts for 29% of the District's economically active population, but for 35% of the jobs.*
 - There are no similar statistics for the other sub-areas and no data on the size of the economically active population compared to the overall population and compared to the employment opportunities in the District.
- 4.1.6. As a Parish Council with a Precept of <£20,000 per annum we are unable to employ a specialist consultant to carry out an in depth analysis of local employment and commuting trends. However, using our local resources we have done an initial assessment of the employment opportunities in the district and this is presented in Appendix A of our Response to the WODC Local Plan Housing Consultation dated September 2014, which concludes:
- West Oxfordshire has limited industry/employment opportunities and a high out-commute rate.
 - Job numbers in West Oxfordshire FELL by 2,000 over the period 2005 – 2013.
 - The Cambridge Econometrics report significantly over estimates the potential for job creation in West Oxfordshire.
 - If the SHMA housing figures are implemented then West Oxfordshire is destined to become a dormitory district serving its neighbours; with the severe negative environmental impacts that this brings, including an INCREASE in greenhouse gas emissions from the increased use of the private car in the district.
 - The existing road network will not cope with the increased traffic.
- 4.1.7. It is clear from the above that a target of 525 homes per annum is not practicable. It has been proven that the 496 homes per annum achieved over the period 2001 –



2011 is unsustainable in West Oxfordshire over the long term (increase in commuting and distances travelled to work as a result.)

- 4.1.8. We recommend that a more pragmatic target should be 417 homes per annum, to reflect the actual average increase in households over the 20 year period 1991 – 2011. This is a practical balance of what might be achievable as a sustainable long term target and the “significant boost’ in housing supply required by the NPPF. It is a 15% increase over the original South East Plan and reflects the simple fact that there is NO significant change in employment opportunities in West Oxfordshire to justify a greater increase.
- 4.1.9. BNPC recommends that WODC exercises the national practice guidance which states that if a Council has robust evidence that past high delivery rates used to inform the projections are no longer realistic – for example they relied on a particular set of circumstances that could not be expected to occur again – they can adjust their projections down accordingly.
- 4.1.10. The clear circumstance that cannot be allowed to happen again is the over-supply of housing delivered over the period 2006 – 2011.
- 4.1.11. The pragmatic target of 417 homes per year over the plan period 2011 – 2029 is 7,506 homes by 2029. This is an increase of circa 1,000 homes over the original South East Plan.
- 4.2. Locating Development in the Right Places:

BNPC believes that Policy OS2 – *Locating New homes, Jobs and Supporting Services* will be primarily focussed within and on the edge of the main service centres of Witney, Carterton and Chipping Norton is UNSOUND on the grounds that Witney and Carterton are so close together (less than 6 miles from centre to centre) that they should be considered as a single service centre.

- 4.2.1. Witney is a vibrant and historic market town famed for its association with the blanket industry. As the main service centre for West Oxfordshire it provides a broad range of employment opportunities in both the industrial and service sectors.
- 4.2.2. Carterton relies heavily on RAF Brize Norton for local employment and in the event that this employment source is reduced, or dries up completely, has nothing to fill this gap. The danger is that this means even more of the population become commuters spending four or more hours a day on congested roads.
- 4.2.3. Towns in this situation are sometimes referred to as garrison towns and although the reliance on MOD jobs has reduced in Carterton the need to commute for well-paid employment has not. It is well-known by local residents that:
- There will be no increase in employment opportunities from the RAF in the future. In fact employment opportunities may decrease.
 - 80% of Carterton residents, who are non-service personnel, out-commute to work.



- Many residents of Carterton use Witney as their main service centre; it has a wider selection of retail and leisure opportunities.

4.2.4. Given that the distance between Witney and Carterton is equivalent to the distance between Blackbird Leys and the centre of Oxford, with a good bus service between the two:

- The residents in both towns use the services of each one,
- Retailers/Employers will base themselves in one place or the other, not both;

Carterton cannot compete with Witney as a full service centre.

4.2.5. Witney and Carterton, for the purposes of the Local Plan, should be considered as a single employment/development area and the development in each town should be scaled back accordingly to meet the housing targets commensurate with the growth opportunities appropriate for the combined area.

4.2.6. BNPC consider that paragraph 4.1.5 of the Local Plan should be re-written to state:

“The new Local Plan will recognise the rural nature of West Oxfordshire, the limits on local employment opportunities and will therefore extend the five sub-areas to promote more general housing dispersal across the district in line with truly sustainable development, which does not promote the use of private vehicles for commuting to work.”

4.3. Carterton Sub-Area:

BNPC believes that Policy CA3 – *Carterton Sub-Area Strategy* is UNSOUND on the grounds that the delivery of 2,600 homes over the plan period far exceeds the opportunity for local employment growth. The need for an *additional* 10 ha of quality business land over the Plan period is not required and the emerging master plan for Carterton, commissioned by Carterton Town Council, is being prepared in isolation from the rest of the Local Plan and without consultation with the neighbouring councils.

4.3.1. BNPC consider that the Plan to deliver 2,600 new houses over the fifteen year period 2015 – 2031 is unsustainable.

4.3.2. The 2011 census data shows that although businesses in Carterton come and go, the overall number of businesses in the town remains relatively constant. There have been no significant increases in local employment opportunities over the last decade and consequently 80% of the non-service work force out commutes from Carterton.

4.3.3. Assuming a flat line growth rate of 173 houses a year for 15 years' Carterton will have to grow at rate in excess of 250 jobs a year for 15 years (or 20 new jobs a month for 180 months) just to maintain the current level of out-commuting.

4.3.4. As stated in 4.2.3 above there are no drivers in Carterton to deliver this level of sustained growth, which means that the current plan will lead to:



- more overdevelopment,
 - a further increase in greenhouse gas emissions associated with more commuting over greater distances,
 - direct contravention of the government’s Agenda on Climate Change and making a mockery of the Sustainability Appraisal discussed in Section 2.4.
- 4.3.5. BNPC do NOT agree that there is a requirement to provide at least another 10 ha of business land over the period of the Local Plan (paragraph 9.3.60).
- 4.3.6. There is currently just under 5 ha of UNUSED business land in the West Oxfordshire and Ventura Business Parks. These business parks were developed expressly to provide employment land for the 1,700 houses built on Shilton Park and have been underutilised for some 15 years. This is despite:
- The consolidation of RAF Transport Command from Lyneham to Brize Norton.
 - The replacement of the VC10 tankers with the Voyager and the Air Tanker Consortium.

Both of the above have been cited as triggers for providing additional high tech, high remuneration, civilian opportunities in the local area. This has not happened and with the MoD being the mainstay of local employment opportunities this is unlikely to change for the foreseeable future.

- 4.3.7. BNPC consider that there should be no consideration for additional business land outside the Carterton Town boundaries until such time as the currently allocated business land is fully developed. This view is independently supported by the “*Assessment of the Demand For and Supply Of Employment Land in Carterton*” (July 2014) prepared by Savills (UK) Ltd in support of the planning application 14/0091/P/OP which concludes “*there is only limited demand for additional employment land around Carterton*”.
- 4.3.8. The Local Plan (paragraph 9.3.77) refers to Carterton's Master Plan (CMP) which will be only made public on the 12th May 2015, four days after the cut off point for this consultation on the Local Plan. BNPC has no knowledge of its contents, and it has not been subject to any form of public consultation. In view of this the CMP should not be considered as part of the Local Plan.

4.4. Economic Objectives:

BNPC believes that Policies CO3 – *Promote Safe, Vibrant and Prosperous Town and Village Centres* and CO7 – *To Deliver Sustainable Economic Growth* are NOT delivered by the Local Plan on the grounds that Oxfordshire has a serious problem. Where there are the most jobs in the County, there is a shortage of housing. West Oxfordshire has the reverse problem, where new housing is being proposed there is often a shortage of jobs. It would seem logical to build the new houses in the locations (other parts of the County) where the jobs exist. This would restore the balance and comply with policies CO7 and CO3.

- 4.4.1. In addition to the initial assessment of employment opportunities in the district presented in Appendix A of our Response to the WODC Local Plan Housing



Consultation dated September 2014, BNPC has carried out additional work on the need for Employment Land in West Oxfordshire and in particular in the Carterton Sub-Area. This work is presented in Appendix A to this report and concludes:

- West Oxfordshire District is being required to act as a dormitory to accommodate the economic development of Oxford City and the Oxford Science Vale.
- Building more houses alongside these important employment centres is logical, but may require a revision of the rules on the 'Green Belt'.
- The engineering and manufacturing industry is best located close to the principal roads in the District, especially the A40.
- The proximity of Witney and Carterton makes it advisable to treat them as a single entity for the purposes of planning non-retail employment.
- It is wasteful of scarce resources to take over the existing Sports Facility at the corner of Monahan Way and Carterton Road and rework them as employment land.
- More effort is needed to use the existing undeveloped and underutilised sites in Carterton.
- There appears to be some confusion regarding the statistics on commuting.

4.4.2. BNPC do NOT support the potential option of using the District Council's playing pitches at Monahan Way for business use, subject to their replacement in a suitable location elsewhere. The playing fields and pavilion are well used, are close to the Brize Norton Remembrance Garden, where the nation's fallen heroes are respected on their last journey home from the RAF base, are also close to the Leisure Centre and are central to Shilton Park and the new developments proposed for Brize Norton. Any move from this area would jeopardise all the benefits of the current location, not to mention the loss of the investment that has already been made in them.

4.4.3. Based on the above BNPC consider that the strategy for the Carterton Sub-Area in particular is UNSOUND as it does not meet the Core Objectives CO3 and CO7.

4.5. Transport and Movement:

BNPC considers that the proposed Local Plan does not meet the Transport Related Core Objective CO10 – “*Ensure that land is not released for new development until the supporting infrastructure and facilities are secured*” on the grounds that the A40 is the main transport artery of the district, which is confirmed as being very badly congested (paragraph 7.23) and that whilst there are possible plans to improve traffic flows these are still at the concept stage, and will not be implemented for some years to come. Some of the alternative rail/public transport options may never be implemented. It therefore follows that no land should be made available for any development in the district until traffic flows freely along the whole length of the A40.

4.5.1. BNPC has reviewed the transport and road components of the Local Plan in particular as they apply to the Carterton Sub-Area. This work is presented in Appendix B to this report and concludes:



- West Oxfordshire District faces potential gridlock if new housing developments are started before the A40's congestion problems are resolved.
- The importance of the A420, although it is outside the District, is not recognised in the plan.
- The new Down's Road junction will increase traffic through Curbridge and Brize Norton.
- The current congestion in Brize Norton and Bampton is not recognised.
- West facing slip roads at the A40-B4477 junction cannot be justified unless adjacent land is allocated for employment.
- There is no policy on improving safety by reducing HGV traffic in rural villages.

4.5.2. Based on the above BNPC consider that the transport and movement strategies for the Carterton Sub-Area in particular are UNSOUND as they do not meet the Core Objective CO10.



5. Conclusions

BNPC has carefully reviewed the Local Plan, in particular the components relating to the Carterton Sub-Area within which the village sits. BNPC has structured its review and report in accordance with the Guidance Note published on the WODC website and we consider that:

5.1. The proposed Local Plan is NOT legally compliant in that:

- The Sustainability Appraisal Report is **FLAWED** and is not fit for purpose – see Section 2.4 of this report.
- The Sustainable Community Strategy has **NOT** been well publicised, if it has been publicised at all – see Section 2.5 of this report.

5.2. The proposed Local Plan is **UNSOUND** on at least five counts:

- The quantum of housing proposed is too high and therefore **UNJUSTIFIED** and **INEFFECTIVE** – see Section 4.1 of this report.
- The focus of development on three service centres is **UNJUSTIFIED** on the grounds that Witney and Carterton are so close together (less than 6 miles from centre to centre) that they should be considered as a single service centre – see Section 4.2 of this report.
- Carterton Sub-Area Strategy is **UNREALISTIC** on the grounds that the delivery of 2,600 homes and the need for an additional 10 ha of quality business land over the Plan period far exceeds the opportunity for local employment growth.
- The emerging master plan for Carterton, commissioned by Carterton Town Council, is being prepared in isolation from the rest of the Local Plan and without consultation with the neighbouring councils, it should therefore be specifically **EXCLUDED** from the Local Plan – see Section 4.3 of this report.
- The proposed Local Plan does not meet its Core Objectives for promoting safe, vibrant and prosperous town and village centres; and will **FAIL** to deliver sustainable economic growth – see Section 4.4 of this report.
- The proposed Local Plan does **NOT** meet the Transport Related Core Objective of ensuring that land is not released for new development until the supporting infrastructure and facilities are secured – see Section 4.5 of this report.

5.3. Based on the above BNPC believes that the proposed Local Plan, if adopted:

- Will not adequately protect the predominantly rural nature of West Oxfordshire;
- Will result in the District becoming the dormitory for the new employment centres in Oxford and the Oxford Science Vale, more than 15 miles away and on the other side of the river Thames, which only has three single lane bridges over it;
- Will result in the number of people travelling to work by car in West Oxfordshire continuing to increase, the distance people travel to work continuing to increase and the time spent commuting in their cars continuing to increase;
- Will not meet the NPPF's focus on sustainability and will be in direct contravention of the government's Agenda on Climate Change.



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APPENDIX A - BNPC Review of Local Employment Opportunities



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Appendix A – Employment Opportunities.

Appendix Summary

1. West Oxfordshire District is being required to act as a dormitory to accommodate the economic development of Oxford City and the Oxford Science Vale.
2. Building more houses alongside these important employment centres is logical, but may require a revision of the rules on the 'Green Belt'.
3. The engineering and manufacturing industry is best located close to the principal roads in the District, especially the A40.
4. The proximity of Witney and Carterton makes it advisable to treat them as a single entity for the purposes of planning non-retail employment.
5. It is wasteful of scarce resources to take over the existing Sports Facility at the corner of Monahan Way and Carterton Road and rework them as employment land.
6. More effort is needed to use the existing undeveloped and underutilised sites in Carterton.
7. There appears to be some confusion regarding the statistics on commuting.

For clarity the following Economic Objectives are quoted:

- C03 *Promote safe, vibrant and prosperous town and village centres and resist proposals that would damage their vitality and viability or adversely affect measures to improve those centres.*
- C07 *To deliver sustainable economic growth which adds value to the local economy, improves the balance between housing and local jobs, provides a diversity of local employment opportunities, capitalises on economic growth in adjoining areas, improves local skills and work readiness, removes potential barriers to investment and provides flexibility to adapt to changing economic needs.*

The county (Oxfordshire) has a serious problem. Where there are the most jobs there is a shortage of housing. The district (West Oxfordshire) has the reverse problem, where new housing is being proposed there is often a shortage of jobs. It would seem logical to build the new houses in the locations where the jobs exist. This would restore the balance and comply with C07.

Paragraph 6.3 states that a high proportion of jobs in the district are in manufacturing and engineering. These operations need raw materials and result in a finished product; both require transport by freight vehicles. To comply with C03 means that these trucks and vans would be best kept out of towns and villages, which in turn means that the employment sites should be located close to the main transport routes, which in West Oxfordshire means on, or close, to a junction on the A40.

We suggest that whilst it makes sense to consider Witney and Carterton as individual towns when it comes to the development of their centres, it may be better to consider them as a single unit for non-retail employment purposes. Thus if the land allocated in west Witney (paragraph 6.20) was increased and a proportion of this was located at the junction of the A40/B4477, this



would serve both towns equally well. This latter site is well served with public transport as the S2 bus service passes through it. The S1 services the southern end of Down's Road.

Developing the above site would prevent further incursion of Carterton into Brize Norton. Carterton needs a period of consolidation; it does not need to expand relentlessly threatening to engulf its neighbours.

Paragraph 9.3.61 refers to the possibility of taking over the existing Sports Facility at the corner of Monahan Way and Carterton Road and reallocating this as employment land. The current sport pitches are well used and have a large pavilion and car park. It has a recently upgraded cricket facility. Moreover, the pavilion has been adapted to accommodate families during Repatriation Ceremonies. The investment in this site is probably in excess of £1,000,000, relocating the facility would cost considerably more. Does the WODC not have the responsibility to protect the taxpayer from unnecessary extravagance?

In addition sports teams tend to identify with a community (and vice versa), so a number of smaller sports fields close to their community might better serve the local populations rather than one very large sports facility, remote from all of them.

Paragraph 6.19 implies that a significant proportion of the employment land in Carterton is unavailable for various reasons. This land has been undeveloped for 15 or more years, is it not time to do something about it? Why the need for further land being discussed while these sites remain largely undeveloped?

Paragraph 6.9 states that there is a net out-flow of 8,000 workers per day, 12,000 in and 20,000 out. The data in paragraph 6.3 suggests that 17,000 travel in, which makes the out-flow 25,000. This imbalance will only get worse if more houses are built than are actually needed by the resident population.

Plans based on conflicting data cannot be considered to be robust.

RSS

2 May 2015



APPENDIX B: - BNPC Review of Transport and Movement Proposals



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Appendix B - Transport and Movement

Appendix Summary

1. West Oxfordshire District faces potential gridlock if new housing developments are started before the A40's congestion problems are resolved.
2. The importance of the A420, although it is outside the District, is not recognised in the plan.
3. The new Down's Road junction will increase traffic through Curbridge and Brize Norton.
4. The current congestion in Brize Norton and Bampton is not recognised.
5. West facing slip roads at the A40-B4477 junction cannot be justified unless adjacent land is allocated for employment.
6. There is no policy on improving safety by reducing HGV traffic in rural villages.

The Transport Related Objective CO10 states "*Ensure that land is not released for new development until the supporting infrastructure and facilities are secured.*"

The A40 is the main transport artery of the district. This road is confirmed as being very badly congested (paragraph 7.23) and that whilst there are possible plans to improve traffic flows these are still at the concept stage, and will not be implemented for some years to come. Some of the alternative rail/public transport options may never be implemented. It therefore follows that no land should be made available for any development in the district until traffic flows freely along the whole length of the A40.

Paragraph 7.20 defines the main routes through the district. It ignores the role played by the A420, which increasingly is being used as an alternative route into Oxford due to the congestion on the A40. The plan also ignores the additional traffic on the feeder roads to the A420, much of which passes through rural villages. Providing relief to these communities should be mandatory under CO10.

Paragraph 7.32 identifies the major road schemes deemed necessary in the Witney area. Of these the Down's Road junction is actually scheduled to be delivered. It will provide an alternative route for traffic onto/off the A40 which will in turn mean more traffic flowing through Curbridge and Brize Norton. No provision to mitigate this is made in the plan.

Paragraph 7.39 states that the road networks in Carterton are not congested. This may be true of Carterton, but there is certainly serious congestion in both Brize Norton and Bampton, much of which is traffic between the A420 and Carterton. The plan has no provision to mitigate these problems.

Paragraph 7.40 identifies the provision of west facing slip roads to the junction of the B4477 and the A40 at a cost of £2.8m. The need for this work is disputed. Routing traffic from the west to Carterton via this junction would add several miles to the journey (remember CO1, *minimise car travel*) and locals and users of SatNavs would almost certainly take the Carterton-Burford Road, the B4020. (NB this proposal *would be* beneficial and welcomed if land at this junction was made available for employment, see Employment Section.)

The plan does not address properly the question of HGVs using unclassified roads through rural villages. The vehicles can cause severe disruption to traffic flow in narrow roads, and their



presence in these conditions is a real safety hazard to pedestrian, cyclist and motorist alike. As part of their transport strategy the WOD should be proposing and promoting Designated Freight Routes in line with CO3.

RSS

1 May 2015