

## APPLICATION WEB COMMENTS FORM

***Information available for public inspection and available on our website***

**Location :** Emmanuel Ranch Windmill Road Towersey OX9 3QQ

**Proposal :** Change of use of land to use as a residential caravan site for 3 gypsy families, including the stationing of 6 caravans of which no more than 3 are to be static caravans/mobile homes, together with the laying of hardstanding.

**Application Reference :** P24/S0941/FUL - 9

Please complete

<b>Your name :</b>	Tim Shreeve & Deborah Pearce
<b>Your address :</b>	Oak Cottage Lower Green Towersey Thame OX9 3QW
<b>Date :</b>	12 April 2024

Use the space below for your comments

Comments as per attachment



We object to P24/S0941/FUL: Windmill Road, Towersey

The site is in open countryside and outside the village boundary of Towersey, as identified in the Neighbourhood Plan, adopted in December 2023. Towersey is classified as a smaller village in the Local Plan with a target of zero dwellings, although the Neighbourhood Plan does support infill development within the defined village boundary to meet identified housing need. As the Neighbourhood plan is less than 2 years old, the Policies within it should be given full weight as identified in NPPF Paragraphs 14.

The criteria for gypsy/traveller sites described in Local Plan Policies H14 & 15 are not met by this proposed site. The site is situated in the open agricultural landscape next to the village of Towersey. It is approximately 200 meters outside the built-up boundary of the village as defined in the Towersey Neighbourhood plan. Towersey has no facilities (e.g. doctors, schools, shops), neither does the nearest settlement of Kingsey. There is a skeletal, experimental, bus service to the nearest town (Thame) with these facilities, but only on Tuesday and Thursday. This comprises one bus there in mid-morning and one bus back some approximately 2 hours later. The site does not meet the criteria for pedestrian provision, it is on a 60mph road, with no footpath or lighting. The shortest route to Thame would be via the A4129, along a 60mph road with no footpath or lighting. An alternative walking route via Windmill Road and then Thame Road/Towersey Road does not have a footpath, is mostly unlit and much of the route is 60mph and is over 3km to the essential facilities. Most journeys are likely to be by car, but permitting this site here does not meet SODC sustainable travel criteria. It is likely that car usage is essential. The vast majority of these journeys will be via the village of Towersey itself as the junction of Windmill Road and the A4129 is dangerous, especially for vehicles turning towards Thame because the turn angle is acute and manoeuvring is very difficult without swinging into the path of oncoming traffic.

The application is lacking in substantial detail, which glosses over its impacts and practicalities as follows:

1. No proposal is made to modify the entrance onto Windmill Road. What is there now does not meet the visibility requirements for an entrance onto a road with the national speed limit. Meeting these requirements would have negative effects on both hedgerows and verges along this rural road, to the detriment of the rural character of the area.
2. A sewage treatment plant is specified, but no details are given, where will this discharge to?
3. It is stated that drainage will be via soakaway, but again no details are given despite the site being on Gault Clay which has very low infiltration capacity.

4. Contamination was identified with the approved application P22/S3712/FUL, but there is no record of this being remediated by the agreed methods, and earth-moving associated with occupancy may have moved this contamination around the site. The current application is silent on contamination.
5. Issues about biodiversity on the site and the site surroundings are ignored. An assessment is required, which needs to take into account the original state of the site to ensure that Policy ENV3 is complied with.
6. It is stated that the site/pitches will be bordered by post and rail fencing. Presumably this is within the larger plot containing the development site. We note that recently installed high close boarded fencing has been installed to the southeast and southwest boundaries of the proposed pitches.
7. No information is provided about lighting on the site. The originally placed whole-plot perimeter floodlighting was extremely intrusive and totally out of character with the rural environment. All site lighting in the open agricultural landscape is inappropriate.
8. Individual gypsy/traveller pitches should also contain separate utility buildings and communal facilities are also needed (<https://assets.publishing.service.gov.uk/media/5a79e68040f0b670a8026416/designinggypsiesites.pdf>). The application is silent on this, but their addition would further detrimentally impact on the rural environment.

We emphasise that the site is in a rural open environment. A previous (2008) appeal to position just one caravan on the site was dismissed by the Planning Inspectorate, including the grounds that it had a detrimental significant impact on the character of the rural environment in this location. Permitting three static mobile homes and three travelling caravans will have a much greater impact than the single caravan, which was the subject of the appeal. We also note that individual gypsy/traveller pitches should also contain separate utility buildings. The application is silent on this

We are also concerned that there is a lack of clarity about whether this application is in addition to the permitted P22/S3712/FUL or whether it replaces it.

We ask you to refuse P24/S0941/FUL, on the basis that it is contrary to Local Plan Policies H14 & 15, ENV3 and also does not meet Neighbourhood Plan Policies, which should be given weight in the decision-making processes. Approving this will have severe impacts on the rural environment and will not provide a sustainable location for such a development.



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**Application Reference :** P24/S0941/FUL - 17

Please complete

<b>Your name :</b>	Christpher Roberts
<b>Your address :</b>	Argyll Lodge Chinnor Road Towersey Thame OX9 3QY
<b>Date :</b>	29 March 2024

Use the space below for your comments

The current entrance to the property is not adequate to facilitate the number of persons living/going to live on the property. A hammer head construction should be required to allow views of traffic on Windmill Road when vehicles are leaving the property. The verges will be destroyed with all/large vehicles turning out of the entrance. Note Windmill Road is currently in a state of disrepair and this application will cause more damage.



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**Application Reference :** P24/S0941/FUL - 21

Please complete

<b>Your name :</b>	Alison Byrne
<b>Your address :</b>	Chiltern View 35 Windmill Road Towersey Thame OX9 3QQ
<b>Date :</b>	15 April 2024

Use the space below for your comments

Objection to Application P24/S0941/FUL

I am writing to formally object to the application P24/S0941/FUL.

Firstly, I wish to draw attention to Towersey's recently adopted neighbourhood plan, which is less than two years old. As such, I expect the policies outlined in this plan to be strictly adhered to.

Towersey, defined as a small village, is outlined in the local plan with no expectation for additional property development. However, in recent years, there have been multiple new developments approved, exceeding the village's required quota significantly. While our neighbourhood plan allows for additional infill developments, this specific application falls outside the designated village boundary, contradicting the provisions outlined in the Neighbourhood Plan.

The proposed site's location is agricultural, surrounded by fields, with its sole entrance directly onto a 60 mph road. This road is in poor condition, with cars often manoeuvring to avoid potholes and cracks, exacerbating its already hazardous nature. Introducing additional families directly onto this road poses significant safety concerns and is incompatible with the intended purpose of the area. Moreover, the absence of footpaths and street lights necessitates car

access for all residents. The limited bus service and lack of nearby amenities, such as shops and restaurants, further compound the impracticality of the location, with essential services requiring a minimum two-mile walk along major roads without pedestrian infrastructure.

Furthermore, the site, once a grass meadow with hedgerows, has undergone unauthorised development, resulting in huge loss of biodiversity as well as widespread land contamination. This contamination, previously listed in the application P22/S371/FUL, remains unaddressed, along with the complete removal of hedgerows and grass, replaced by impermeable tarmac. The absence of any biodiversity mitigation measures or replanting of removed hedgerows exacerbates environmental concerns. Given Towersey's existing challenges with flooding, the extensive tarmac coverage will likely exacerbate water flow issues, contributing to flooding incidents in areas like Church Lane and the village crossroads. There is no mention of this unapproved new tarmac in the current application.

Additionally, there is ambiguity regarding the status of a previously approved small one-bedroom barn conversion (P22/S371/FUL) on the current site. It remains unclear whether this development is still underway or if the current application supersedes it entirely.

In summary, I urge the refusal of this application due to its non-compliance with the neighbourhood plan and failure to meet the local plan guidelines for a gypsy or Traveller site, as stipulated in policies H14 and H15.



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**Application Reference :** P24/S0941/FUL - 22

Please complete

<b>Your name :</b>	Andrew Fitzgerald
<b>Your address :</b>	Deans Farm Chinnor Road Towersey Thame OX9 3QY
<b>Date :</b>	15 April 2024

Use the space below for your comments

We object to P24/SO941/FUL

Towersey has approved and has operational a Neighbourhood Plan. This planning request contravenes the parameters and policies within the Neighbourhood Plan and consequently should be rejected.

We also note there are other major concerns with the planning request. It has scant information with regards to the essential utilities for expansion of residence on the site. Where will sewage be disposed? How will the site be lit? Floodlighting is massively intrusive and out of keeping with the local and rural character of the site.

This is a rural area in agricultural land. It is on a 60mph road which is narrow. Increased road traffic with turning heavy and long vehicles (such as lorries and caravans) will likely cause constant issues for other road users particularly villagers but also this road is constantly used by many and various cycling clubs of the area.

There is no consideration to the impact on facilities in the area. Access to Thame for schools, health facilities and shops will be via roads that have no pedestrian provisions. This again will increase journeys by car, van and trucks,

increasing the flow of traffic through the village and causing hazards at key junctions.

This planning request does not meet the considerations of the Neighbourhood plan and would have a massive detrimental impact on the rural environment and the character of the area. It should therefore be rejected.

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**Application Reference :** P24/S0941/FUL - 24

Please complete

<b>Your name :</b>	Brent Jackson
<b>Your address :</b>	
<b>Date :</b>	15 April 2024

Use the space below for your comments

This development and retrospective planning permission should be refused and should not be allowed to go ahead. The new owners have completely disregarded planning laws and protocols. The road is not suitable for this traffic and there is also no pavements on this road to thame or to Towersey. The land has been further contaminated by the burning of caravans and rubbish which has then been buried on site. This site is completely contaminated now. The owners should be refused planning and made to clean up the existing site before any new applications can be made. Should this be granted retrospectively I can only imagine many more fields and rural small holdings will be bought and this approach repeated. I urge you all in the planning committee of Sodc to send a strong message to anyone thinking of repeating this approach that you will not tolerate this approach.





[REDACTED]

noise

**From:** [REDACTED]  
**Sent:** 16 April 2024 18:31  
**To:** Robert Cramp [REDACTED]  
**Subject:** Planning application

**\*\*EXTERNAL\*\***

Dear Robert

I request any sensitive information to be redacted before it is registered (i.e. name and address plus email)

I wish to object to the planning application proposing 6 caravans and hardstanding (P24/S0941/FUL) as the site is not sustainable environmentally or socially:

1. The site does not have safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network.
  - The development is on a 60mph road with no pavement or lighting.
2. The proposal will have an unacceptable impact on the character and appearance of the landscape, the significance of heritage assets and the amenity of

neighbouring properties, and has not been sensitively designed to mitigate visual impacts on its surroundings.

- Overdevelopment of a *site* within open countryside (including significant hardstanding giving an urban appearance) away from existing settlements/outside areas allocated in the development plan.

The Inspector on a proposal for a solar farm on an adjacent site inferred that further development in that area would result in unacceptable harm to the significance of heritage assets and the character/appearance of the area: *If the appeal scheme was permitted the LPA would not be bound to approve any future enlargement of the development before me or permit other solar farms elsewhere. Even if a scheme of enlargement was submitted to the LPA an applicant, amongst other things, would need to demonstrate that any such development was in scale with the character of the landscape and did not unacceptably harm the significance of heritage assets or the appearance of this area of countryside. As I have already noted above, the proposed development would be visible from some neighbouring properties. The solar PVs are intended to absorb rather than reflect light and would be unlikely to result in any serious glint or glare. Whilst for some residents the proposal would alter their outlook, the development would not be so close as to appear overbearing or oppressive. The occupiers of neighbouring dwellings would continue to enjoy a pleasant and predominantly rural outlook.*

Another Inspector on a proposal for containers on the same site dismissed the appeal stating: *The development would result in a modest perceptual change to the character and appearance of the countryside from the containers themselves, having regard to the potential screening afforded by a landscaping scheme. However, I consider it is the potential activity associated with their use that would more significantly harm the character and appearance of the area, together with the unsustainable location of the site itself (i.e. not within safe walking distance, insofar as there is no paved continuous footway from the village to the site). This would be contrary to saved policies C4, D1, G2, G4 and E5 of the SOLP.*

- The site is not integrated with the rest of the community to promote peaceful and integrated co-existence between the site and the local community. Not only is it outside the built-up boundary of the village as defined in the Towersey Neighbourhood plan but it is also enclosed with high post/rail fencing and fronted by a large imposing gate and piers.
- The Ecology Officer has confirmed that the development will result in a significant loss of biodiversity contrary to Local Plan policy.
- No flood risk or contamination assessment has been undertaken for the wider development (i.e. including areas where unlawful development has taken place).
- Poor design resulting in significant harm to the landscape/countryside. There has been no thoughtful consideration to mitigating the landscape (e.g. planting etc) and visual



impact of the proposed development.

3. The applicant has not provided any evidence to support that he and his family are persons that are leading or have led a nomadic life.

If an applicant is of a generally nomadic habit of life – he has not explained why he is applying for a permanent residential planning permission. The applicants are not confined to a permanent base for personal reasons such as sickness and/or the interests of their children.

In the case of *R v South Hams DC Ex p. Gibbs* [1995] Q.B. 158, the Court of Appeal was concerned with the definition of “gypsies” in s16 of the Caravan Sites Act. Whilst confirming that nomadism must necessarily involve “wandering or travelling from place to place”, the Court decided that:

*“there must be some recognisable connection between the wandering or travelling from place to place and the means whereby the persons concerned make or seek their livelihood”. In addition, “section sixteen [of the Caravan Sites Act 1968] does not therefore apply to persons or individuals who move from place to place merely as the fancy takes them and without any connection between the movement and their means of livelihood”*

It is for the applicant to demonstrate that status and for the LPA to be satisfied with the evidence presented. The application should be accompanied by information on evidence of the applicant's gypsy status: *“including details of travelling by the applicant and by family members for the purpose of work and copies (not originals in case they are lost) of family photographs”*. Otherwise this application is essentially a means to address the national shortage of affordable housing.

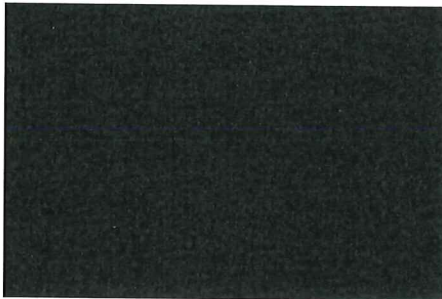
It is also worth referring to another Court of Appeal decision: [\*Wrexham CBC v National Assembly of Wales\*](#) [2003] EWCA Civ 835 where Auld LJ stated that the following propositions of law should be applied:

*“(2) Whether applicants for planning permissions are of a ‘nomadic way of life’ as a matter of planning law and policy is a functional test to be applied to their normal way of life at the time of the determination. Are they at that time following such a habit of life in the sense of a pattern and/or a rhythm of fulltime or seasonal or other periodic travelling? The fact that they may have a permanent base from which they set out [on], and to which they return from, their periodic travelling may not deprive them of a nomadic status. And the fact that they are temporarily confined to their permanent base for personal reasons such as sickness and/or possibly the interests of their children may not do so either, depending on the reasons and the length of time, past and projected, of the abeyance of their travelling life. But if they have retired permanently from travelling for whatever reason, ill health, age or simply because they no longer wish to follow that way of life, they no longer have a ‘nomadic way of life’. That is not to say that they cannot recover it later, if their circumstances and intention change...But that would arise if and when they made some future application for permission on the strength of that resumption of status”.*

*(3) “Where, as here, a question is raised before a Planning Inspector as to whether the applicants for planning permission are ‘gypsies’ for the purpose of planning law and*

policy, he should, (1) clearly direct himself to and identify, the statutory and policy meaning of that word; and (2) as a second and separate exercise, decide by reference to that meaning on the facts of the case whether the applicants fall within it...

(4) In making the second, factual, decision whether applicants of planning permission are gypsies, the first and most important consideration is whether they are – to use a neutral expression – actually living a travelling life, whether a seasonal or periodic in some other way, at the time of the determination. If they are not, then it is a matter of fact and degree whether the current absence of travelling means that they have not acquired or no longer follow a nomadic way of life."



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**Application Reference :** P24/S0941/FUL - 29

Please complete

<b>Your name :</b>	Martyn Phillips
<b>Your address :</b>	29 Windmill Road Towersey Thame OX9 3QQ
<b>Date :</b>	16 April 2024

### Use the space below for your comments

I wish to object to the application P24/SO941/FUL on the following grounds:

1. Non compliance with the Towersey Neighbourhood Plan:

Policy 5.1.4 of the Neighbourhood Plan states: The policy requires that development proposals outside the defined boundaries are in line with the relevant policies of the Local Plan (Policies H1 and Policy H8) and Neighbourhood Plan in respect of protecting local landscape and character of the natural environment character. This recognises the valued function of the countryside and working farmland in shaping rural character. This policy is reinforced by Local Plan 2035, Policy H14(iii) which sets out the conditions of acceptance:

iii) the proposal will not have an unacceptable impact on the character and appearance

of the landscape and the amenity of neighbouring properties and is sensitively designed to mitigate visual impacts on its surroundings.

Lighting is already in place on the site, which is causing light contamination to the surrounding countryside.

I consider that the application contains insufficient detail to properly assess the impact the proposal will have on the local landscape and character.

Furthermore, I note that the report as submitted by the South and Vale Ecology Team, identifies the notable damage already inflicted by the unlawful earthworks which have been carried out on the site.

## 2. Access

The Design & Access Statement submitted with the application indicates that the site is to provide a permanent base from which the proposed three families can travel for the purpose of making their living. Several trucks and a large box van are already on the site.

Windmill Road is a 60 mph road which is in considerable disrepair, and I am concerned that increased access and egress from the site by large vehicles, in addition to the private cars, will only exacerbate the problem. No pavements or street lighting exist in the area of the proposed site, which would make travel to and from the site hazardous.

Consideration should also be given to the fact that the current application is in addition to the approved application for the conversion of the existing stables to form a 1 bed dwelling, which uses the same access point.

The SODC Local Plan 2035 also sets out the following requirements under Policy H14:

v) the site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network. The site will be large enough to enable vehicle movements, parking and servicing to take place, having regard to the number of pitches/plots on site;

## 3. Previous Planning History in the area:

I note that an application for a change of use to a site in the immediate vicinity of the proposed site in Windmill Road was previously refused planning permission, under ref. P18/S1865/FUL, & dismissed at appeal. This application was for a change of use from agricultural land to storage and siting of storage containers, however the application site was similar in size and the storage units were a similar size to typical static caravans. The Appeal officer dismissed the appeal on the grounds of harm to the appearance & character of the area and harm from increased traffic movements.

Although I appreciate that each planning application will be determined on its merits, there are striking similarities in these applications. Indeed, it could be argued that the 2018 application site is less conspicuous, due to its siting between the solar farm and the sewage treatment works, whereas the 2024 application is in a more exposed position in the open countryside.

## 4. Lack of information:

I note the lack of information with regard to dispersal of surface water and soil drainage.

The soil infiltration rate for the proposed site area is very low, due to the sub strata. Therefore, it is likely that boreholes would be required, which would require approval from Environmental Agency. Likewise, an SuDS surface water system would be required.

No elevation drawings for the proposed caravans or topographical information have been provided.

No ecological mitigation plan has been provided.

No landscape plan has been provided.

For the reasons set out above, I would object to this application.

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**Application Reference :** P24/S0941/FUL - 35

Please complete

<b>Your name :</b>	Lisa Davis
<b>Your address :</b>	Cuttlebrook Farm Manor Road Towersey Thame OX9 3QU
<b>Date :</b>	17 April 2024

### Use the space below for your comments

The description for this application is:

Change of use of land to use as a residential caravan site for 3 gypsy families, including the stationing of 6 caravans of which no more than 3 are to be static caravans/mobile homes, together with the laying of hardstanding.

According to the Design and Access Statement submitted by [REDACTED], on behalf of the applicant, the application is for a proposed Gypsy caravan site and the purpose of the site is to meet the accommodation needs of the Smith family, including the applicant and his two adult sons who all need a permanent base from which they can travel for the purpose of making their living .

I interpret this as a desire by the applicant and his sons to give up the characteristically nomadic lifestyle of a Gypsy (which is, I understand, how the applicant self identifies) and to live as the settled community do, in one fixed location. If that is the case, then the application is not for a Gypsy caravan site to enable the continuation of the Gypsy nomadic way of life but is an application for several permanent dwellings to allow the applicant and his family to live a settled life. On that basis, the application should be considered in the same context as one from the settled community.

The proposed development is contrary to the newly formed Towersey Neighbourhood Plan and for that reason should be refused.

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**Application Reference :** P24/S0941/FUL - 36

Please complete

<b>Your name :</b>	Mark Davis
<b>Your address :</b>	Cuttlebrook Farm Manor Road Towersey Thame OX9 3QU
<b>Date :</b>	17 April 2024

### Use the space below for your comments

Emmanuel Ranch is in the open countryside 200 metres from the defined built up village boundary as defined in Towersey Neighbourhood plan which was adopted in December 2023.

The site currently has planning permission to convert the existing stable block into a 1 bedroom dwelling under planning guidelines where a redundant agricultural building can be converted into a dwelling. The new dwelling cannot be larger in height or footprint than the existing redundant agricultural building. It is not permitted to increase the size or mass of the building for 10 years once work has begun.

This application seeks to add a further 3 permanent dwellings to the barn conversion already granted for this site and should be assessed on the same basis as any other application for a dwelling. These are static caravans and as such are static , and do not form part of the nomadic lifestyle associated with being a Gypsy.

Referring to Towersey Neighbourhood Plan, Policy TOW1(c) Proposals for development outside the Village Boundary will only be supported where they are considered appropriate rural development as defined by the NPPF, and are consistent with other policies in the development plan, including the other

policies in this Plan. This policy requires that development proposals outside the defined boundaries are in line with the relevant policies of the Local Plan (Policies H1 and Policy H8), and Towersey Neighbourhood Plan, in respect of protecting the local landscape and character of the natural environment. This recognises the valued function of the countryside and working farmland in shaping rural character. Without exceptional circumstances, this application is against TOW1.

Since the current static caravan has been on site there has been significant light pollution from an array of flood lights surrounding the plot, adversely affecting the nighttime character of the countryside.

The applicant has grubbed out hedges and replaced them with tall close boarded fencing. This adversely affects biodiversity and the rural character of the countryside and is against the Towersey Neighbourhood Plan TOW7 and the local plan policies ENV1,2 and 3, and is against 8c of the NPPF. There have also been several fires where plastics have been burned and even a caravan, also against 8c of the NPPF.

The siting of the proposed static caravans is on the lower part of the site, leaving no space to put any sewage treatment plants which have to be a minimum of 7 meters away from any dwelling. There is also no allowance for any foul soak away drainage, such a structure would have to take up the entire area proposed for the siting of the static caravans just for the one static caravan that is currently there, unless the intention is to discharge the sewerage directly into the neighbouring ditch which would pollute the ditch running east on the south side of the site which would have a devastating effect on wildlife.

The site is in close proximity to a municipal sewerage treatment plant. No professional assessment is provided as to the safety of the residents from odours and gasses.

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied.

8 c - an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

12 - The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making.

Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material



considerations in a particular case indicate that the plan should not be followed.

The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and  
the neighbourhood plan contains policies and allocations to meet its identified housing requirement.

The Towersey Neighbourhood Plan has a clear defined settlement boundary which is not open to interpretation as the application suggests. In this case Emmanuel Ranch is unmistakably outside the defined settlement boundary.

Emmanuel Ranch is isolated some 200 metres away from the settlement boundary of Towersey, in the open countryside. Gypsy/Traveller sites are meant to be in sustainable locations close to facilities like schools, shops and doctor s surgeries, and are encouraged to be part of the greater community. There are 2 buses a week to Thame, one on a Tuesday and one a Thursday, and a return bus 2 hours later on each day. After 200 metre a walk along a 60Mph road with no pavement, there is a 200 metre stretch of footpath to Thame Road then there is a 3Km walk to Thame along a road with no footpaths. It is a 4.3Km walk to the shops via the only pedestrian safe route, the Phoenix trail. The only viable way of getting to essential facilities would be to use vehicles and so moving away from a low carbon option.

This application is contrary to H14 and H15 of SODC local plan which requires Gypsy/Traveller sites to have safe pedestrian access to such facilities. The site is not sustainable and fails to meet the requirements for Gypsy/Traveller sites.

An application to site a single caravan on the site (P08/E0771/DA) was refused on appeal. The reasoning given was that a single caravan here posed a significant impact on the character of the area. Siting 6 caravans would be even more damaging.

I object to this application based on policies TOW1,3 7 & 10 of the Towersey Neighbourhood Plan, SODC Local Plan 2011-2035 Policies H1,8,14 & 15, DES 1,2 & 8-10, and ENV1,2 & 3 and the NPPF 8c and 12.

