

3 Church Row  
Bourton  
Nr Shrivenham  
SN6 8JG

18 December 2014

Dear Sirs

I wish to object to the VoWH District Council Local Plan Final Draft December 2014. I fully support the objections raised by Bourton Parish Council and the CPRE in their submissions to the Council. In addition to their comments, I would like to raise a number of issues of particular concern to me.

#### Forecast Housing Needs

CPRE's consultant Mr Alan Wenban-Smith presents a damning review of the methodology used in the SHMA to arrive at the housing need in the Vale, one of the conclusions being that the SHMA figures for housing are more than 2.5 times greater than the official projections. I am deeply concerned that the SHMA was written by an unelected group, who may well have their own private objectives for over-estimating housing need, rather than an unbiased objective to serve the true needs of the area. The SHMA is a SHAM and needs to be robustly challenged.

#### Sustainability

The concept of sustainability is hard to define, in fact there is a point of view that "sustainable development" is an oxymoron. Sustainability is commonly taken to be based on three components:

- Environmental sustainability: whereby the natural capital (water, soils, flora, fauna, etc) remains intact.
- Social sustainability: whereby the cohesion of society and its ability to work towards common goals is maintained and individual needs such as health, shelter, and education, are met.
- Economic sustainability: where development which moves towards social and environmental sustainability is financially feasible.

Allowing the construction of more houses than are needed is clearly not sustainable from an economic, social or environmental point of view. Sustainable development also needs to take account of the infrastructure needed to support the housing allocation. In many parts of the Vale, we do not have adequate infrastructure to accommodate the existing situation, from the highway infrastructure to water and sewerage provision, to services such as education and health care. Consequently, considerable new investment is needed.

The development of the much needed infrastructure and housing is going to have significant impacts on our environment – much of which is Green Belt and also includes nationally designated AONB, in addition to nature conservation sites, high quality agricultural land, and the built environment including conservation areas, listed buildings and archaeological sites.

The proposed large influx of people would have significant impact on the cohesion of society already living in the Vale, particularly where the scale of new development is out of proportion to the existing scale of settlements, such as Shrivenham. It is also doubtful whether there would be sufficient services such as education and medical care.

Furthermore, it is not sustainable development to build housing in rural areas like Shrivenham, where there is little prospect of new employment. This only increases traffic on the roads, and leads to increased congestion, noise and vehicle emissions, as householders take to the road to commute to their place of work. There should be a presumption of housing provision near centres of employment.

The environmental, social and economic impacts of the infrastructure and housing needs resulting from the revised SHMA need to be assessed, prior to making final decisions on the location and size of housing allocation, to ensure that the environment and affected communities can absorb the projected levels of housing.

#### Front Loading of the Housing Provision without Investment in Infrastructure

I am concerned about the Council's proposals to front load the building of houses prior to providing the necessary infrastructure. Of particular concern is the cumulative impact of all the proposed development, including the 8,000-10,000 homes intended in Swindon Borough Council's Eastern Villages proposals, along the whole of the A420 between Swindon and Oxford. This highway is currently at or near capacity during peak hours. Given the lack of employment in what is essentially a rural area, the lack of public transport, the lack of other strategic routes apart from the A420 and propensity of rural lanes, and the fact that many households these days run two cars, the potential increase in traffic gravitating towards the A420, and other main roads in the area, is very considerable.

Improvements in **infrastructure** must be front loaded before increased housing. Failure to do so would result in a very significant deterioration of our everyday lives. Furthermore, the contributions from developer via the Community Levy are unlikely to cover the level of the infrastructure required. The Council is in effect proposing a sticking plaster at a few hotspots while what is needed is a considered investment in infrastructure in the Vale.

There must be a strategic environmental assessment of traffic arising from the proposed new housing on roads in the plan area, including the A420 between Swindon and Oxford. This assessment is needed to identify the needs for highway improvements and assess the impacts on the environment. The SEA should drive the infrastructure needs, not what developers can afford under the Community Levy. This report **must** be available for consideration at the Examination in Public on the Plan in order for the Inspector to be able to arrive at an informed decision on the impact of the additional traffic on the highway network; the environmental and social impacts associated with road traffic accidents, severance, journey times, noise, and air quality; and the adequacy of any proposed mitigation.

The increase in housing provision in the Vale would impact significantly on journey times and travel routes for local and through traffic, encouraging rat running along country lanes which are not suitable for heavy, fast traffic and spoil the quiet enjoyment of the countryside.

#### Implications for Expansion at Shrivenham

The proposed 500 houses at Shrivenham are additional to the 135 houses already agreed, and some 294 houses awaiting a decision (based on figures in March 2014). The total increase in housing could double the size of the village, which has approximately 900 houses at present. Such a level of development is out of proportion with the existing population and the services available within the village centre and would undoubtedly impact on the heritage setting and social fabric of the village.

As someone living in one of the outlying villages, I would like to point out that Shrivenham currently provides a valuable service to me. I use the local shops, the bank, the post office, and the health

centre. As it takes me 1.5 hrs to walk there and back, I am reliant on being able to park in the high street to access these services. At present I can usually find a parking space but with the growth of the village around its periphery I fear that it will become increasingly harder to park there with increasing demand from the residents in the new developments. Over time, Shrivenham would be less able to provide a service to those of us already living in the outlying villages, where we have none of the above services.

Given the extensive development proposed by Swindon Borough Council in the Eastern Villages, there are already plans for major changes in land use on our doorstep. I would like to see protection of the countryside between Swindon and Oxfordshire, so that we can preserve the rural character of this area. To accommodate that, any additional housing around Shrivenham should be significantly reduced to avoid creating an urban corridor extending east from Swindon.

#### Public Consultation at Shrivenham

I would like to add a final note about the public consultation at Shrivenham in spring 2014. I appreciate that feelings were high in the Hall. Notwithstanding, I was unhappy about the way the meeting was conducted. The attitude that came across was that these are the plans and if you reject them, it will be much worse for you as more unsuitable projects will get built. This was a thinly veiled threat for us to lie down and accept whatever the Council wishes to impose and in my view does not constitute consultation.

I am concerned, as our Bourton Parish Council and CPRE explain in their submissions, that the Consultation Report does not accurately reflect the level of objection to the Local Plan from people living in the plan area and does not demonstrate how our objections have been considered and used to modify the Local Plan. In fact, the Local Plan is little modified and our concerns have been largely ignored.

#### Way Forward

The excessive level of proposed housing all stems from the SHMA, which grossly exaggerates the need for housing in the Vale. I would like the Inspector to start by reviewing and challenging the assumptions made in the SHMA, and from that, to consider the available infrastructure in the Vale and the need for infrastructure to service the proposed housing. Only then can you start to consider the location and size of allocation of housing in the Vale. The environmental and social impacts of the infrastructure and housing then needs to be considered in combination.

Yours faithfully

Dr C Francis