

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	Dr
First Name	<input type="text"/>	David
Last Name	<input type="text"/>	Illingworth
Job Title (where relevant)	<input type="text"/>	-
Organisation representing (where relevant)	<input type="text"/>	North Abingdon Local Planning Group
Address Line 1	<input type="text"/>	2, Boulter Drive
Address Line 2	<input type="text"/>	
Address Line 3	<input type="text"/>	Abingdon
Postal Town	<input type="text"/>	Oxfordshire
Post Code	<input type="text"/>	OX14 1XF
Telephone Number	<input type="text"/>	01235 523442
Email Address	<input type="text"/>	david.illingworth@talk21.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: **North Abingdon Local Planning Group (NALPG)**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

4A

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☒

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☒

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Core Policy 4a – Meeting our housing needs

This policy does not take account of the government's recent proposal that the Overall Assessment of Need (OAN) for the Vale of White Horse should be 689 houses per year. This is much lower than the 1,199¹ per year suggested by the Vale Plans Part 1 and 2. 689 is 43% less than 1,199.

NALPG estimates that to meet the government's target, houses for an extra 24,000 people would have to be found in the Vale. The Vale plans add another 22,000 to that figure. So overall, the population of the Vale would increase by 46,000 by 2031. That is equivalent to 1.4 times the population of Abingdon, which was 33,000 in 2011.

Around 10,000 of the population increase is due to 'natural increase' in the Vale (as more births than deaths are expected). This is included in the 24,000. The remaining 36,000 of growth is due to net immigration to the Vale.

¹ 1,199 = (20,560 in Part 1 + 3,420 in Part 2) divided by 20

We think that the Vale should:

- **Reconsider its overall figures which are wildly excessive;**
- **Reconsider the size of the overspill from Oxford;**
- **Reconsider where in Britain the additional 36,000 people might come from and if that is reflected in the plans for those areas;**
- **Note that over 70% of the growth in the number of households in the government projections for the Vale will be 'headed' by people aged 65 and over. The Vale should develop appropriate housing policies to respond to this aging of the population; and**
- **If it continues to plan growth on such a scale, it should reconsider, clearly justify and consider the risks arising from its forecasts for the increases in the number houses and jobs that the plan is currently based on.**

The government's recent consultation paper 'Planning for Homes' proposes an OAN for the Vale of 689 houses per year. This seems unlikely to change much as the same method has been applied to all authorities in England and the overall total nationally meets the target figure of building 250,000 houses per year.

The figure of **689** comprises:

- **517** from based on a projection of future need, based on past trends; and
- A generous allowance for increasing the affordability of houses in the Vale (by building more) of **172** per year.

So, the allowance for affordability is 25% (172/689) of the total figure for the Vale, of 689 per year.

There is a similar reduction for Oxford, where the new OAN is just 746 houses per year compared to the SHMA figures of 1,200 to 1,600 per year. The effect of this is that the 'overspill' from Oxford to the Vale reduces from 2,200 houses during the rest of the plan period, to just 282².

Thus, using the new government figures, the total needed for Vale over the plan period is 14,062 houses³. This is 6,498 less than the provision of 20,560 in the Part 1 Vale local plan.

² Assuming a mid-point SHMA figure of 1,400pa for Oxford, this gives a total figure of 28,000 for them over 20 years. According to the Vale plan (page 10) the total overspill is 15,000. Thus, Oxford can find room for 13,000 houses towards its SHMA figure. If Oxford's need is only 746pa though, its total need over 20 years falls to 14,920. It should still be able to find 13,000 of them, so the overspill falls from 15,000 to 1,920. The Vale's share of the overspill was 2,200 (page 10 of the Vale plan), so a 14.7% share. A 14.7% share of the much lower figure of 1,920 is only 282.

³ $14,062 = (20 \times 689) + 282$

Part 2 of the Vale's plan, based on pre-Brexit SHMA figures, assumes that another 3,420⁴ houses are needed, increasing the Part 1 figure from 20,560 to 23,980. This would mean that 9,918 more houses would be built in the Vale than we are likely to need according to the government. It is worth noting that the household projection in the OAN figure from the government – the figure of **517** mentioned above – includes a significant amount of net migration to the Vale (that means more people will come here to live than leave).

So, the growth in the government's OAN figure can be divided into three causes:

- 207 pa due to the growing need of existing residents;
- 172 pa to allow for increasing the affordability of houses in the Vale; and
- 310 pa to house additional net in-migrants.

Other government projections suggest that the average size of a household in 2031 in the Vale will be 2.288⁵. So, we can convert the figures for household growth into numbers of people. The following table summarises all these figures:

⁴ 3,420 = 2,020 in Abingdon and Oxford sub area and 1,400 in the Vale East sub area, from page 27 of the Plan.

⁵ Table 427 of the Household forecasts

Housing growth in the Vale of White Horse 2011-2031

	<u>Number of houses</u>	<u>Approximate Extra People by 2031</u>
To meet the Government target		
Need of existing local people	4,136	9,463
Allowance to increase affordability (1)	3,440	
Growth caused by Net immigration	6,204	14,195
	13,780	
Overspill from Oxford	282	644
Total to meet government target	14,062	24,302
More growth added by the Vale plans		
Part 1	6,498	14,868
Part 2		
Additonal overspill from Oxford	2,200	5,034
Even more growth added by the Plan	1,220	2,791
Total additional growth	9,918	22,693
Overall total	23,980	46,996

(1) Assumed that all this is taken up by people who are already resident in the Vale

Finally, the Vale should note that over 70% of the growth in the number of households in the government's projections are expected to be 'headed' or represented by someone aged 65 and over. The Vale should seriously consider planning for this, including policies that encourage and enable downsizing and allow movement of elderly people into other accommodation, freeing up larger houses for families and reducing the under-occupation (where one or two people live in a large house). Policies to reduce the number of relationship breakdowns may also help reduce demand due to one household breaking down into two.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

NALPG considers that the current plans provide for excessive growth in the Vale of White Horse. There is a considerable risk that development on this scale will not happen and the result of zoning excessive amounts of land will be a complete loss of control over where development takes place and serious problems for developers who will find that there is excessive competition to sell new houses in the Vale.

NALPG sees no reason for ANY additional housing to be added by the Part 2 plan. The Part 1 plan has provided enough land for the proposed government target for the Vale plus an updated allowance for overspill from Oxford.

NALPG also considers that the plan should take more account of the fact that most of the growth in household numbers will be households comprising, led or represented by people Aged 65+. Policies to encourage downsizing and transfer to more suitable accommodation should be developed to reduce and prevent increases in the under-occupation of the housing stock. Policies to reduce the number of relationship breakdowns may also help reduce demand due to one household breaking down into two.

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We think that our views are clear but would be happy to explain them if necessary.

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22 Nov 2017

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Part B – Please use a separate sheet for each representation

Name or organisation: **North Abingdon Local Planning Group (NALPG)**

3. To which part of the Local Plan does this representation relate?

Paragraph

2.59

Policy

8a, 8b

**Appendices
pages 13-16, 30, 32**

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes



No



4. (2) Sound

Yes



No



4. (3) Complies with the Duty to Cooperate

Yes



No



5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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NALPG does not accept that there is a need to zone any more land in Part 2 of the plan. We have consistently opposed the release of land in the Green Belt around Abingdon. We don't think that the 'exceptional circumstances' required to take land out of the Green Belt have been met for Dalton barracks, particularly for the open areas and runways.

But if land must be released, we are content that the release of Dalton barracks (Abingdon airfield) which is already built up or developed with a system of runways, is the least bad choice of site. The site is shown on page 36 of the plan, and pages 13 to 16 of the Appendices.

Dalton barracks does have a shortage of good access routes. Access towards the West is poor. Wootton road offers a trek to Cumnor, the A420 and Oxford. Minor roads run towards Oxford through Sunningwell and up Fox Lane over Boars Hill to the Hinksey junction with the A34. The Marcham road leads to Marcham itself, Grove, Wantage and on towards Kingston Bagpuize. Access Eastbound from Dalton barracks is along the Wootton road under the A34 into Abingdon, or through Shippon and over the A34 into Abingdon. Or South to the Marcham Road junction with the A34. None of these links are particularly suitable and problems in providing cycle access are general. The plan is relatively silent on how the evident access issues might be addressed. Our view is that:

- Ideally, door to door bus routes will give the site access to key workplaces;

- Cycle tracks and pedestrian routes will increase accessibility and sustainability, particularly into Abingdon;
- Other sensible road improvements need to be agreed;
- Provision for employment on the site could reduce the need for commuting; and
- There needs to be clearer provision for link to the Marcham junction, ideally directly onto the roundabout and not just following the existing low-quality Barrow Road / Faringdon Road / Marcham road.

Proposals in the plan that are contentious are in the diagram on page 32 of the Appendices:

- Safeguarding land to the NW of the Lodge Hill junction, for a Park and Ride site (Also Para 2.59, 2.60 and page 30 of the Appendices); and
- The proposed bus and cycle routes connecting Wootton Road, near the airfield to that Park and Ride (Appendices page 32).

NALPG opposes the proposed Park and Ride site at Lodge Hill

NALPG has consistently opposed the proposed Park and Ride site at Lodge Hill. Our concerns are:

- It will mean development of a clearly rural site and even more of the Green Belt will be lost forever;
- It could interfere with and in the long run detract from the already excellent and commercial bus service from Abingdon to Oxford (X3, X13 and S8 buses in particular). Our support for continuing and bolstering these bus services means that we strongly support the proposal for a bus only lane going North on the A34 from Lodge Hill to the Hinksey Hill junction (see page 30 of the Appendices). Though there is no clear funding for this useful scheme;
- It will set the area up for future extensive and inappropriate developments in the Green Belt such as a lorry park, facilities for lorry drivers, additional housing and potentially the Oxford to Cambridge Expressway;
- The site chosen will damage the rural character and setting of Sunningwell village; and
- It will be a magnet for traffic from Dalton barracks which will rat-run through Sunningwell.

NALPG considers that the location of a Park and Ride at Lodge Hill should be reconsidered in the light of the proposed development of Dalton barracks. A site at the Marcham Road / A34 junction could well be preferable.

Proposed bus/cycle lanes from Wootton Road to the Park and Ride

NALPG is also very seriously concerned about the proposed Bus/cycle lanes from Wootton Road to the proposed Park and Ride site. These are shown on page 32 of the Appendices. They would link the Dalton barracks development to the Park and Ride. However:

- The exact routes are very poorly located. They carve up farmland and cut across existing roads, tracks, drives and footpaths. They would urbanise all the large open, sweeping and attractive belt of countryside between Sunningwell and the A34;
- Other routes don't seem to have been considered but are no better in other respects. Other options might be:
 - To run parallel to the A34, but this would be a poor environment for cyclists; and
 - Developing the road network through Sunningwell (along Sunningwell Road and the lane towards Sugworth and the A34). However, this would urbanise the village and require extensive purchase of slices of land. A cycle only route through the village might be a more feasible and acceptable proposal though.
- Both the safeguarded routes from Wootton Road ignore the contour lines and go uphill and downhill, making the route unnecessarily difficult for cyclists;
- We understand that there was no consultation with the Highway authority (Oxfordshire County Council) about these routes;
- Although the routes are for buses and cycles, they might develop into routes for cars by the time they are built;
- They are not justified by the existing size of the development; and
- Safeguarding this land has blighted and will continue to blight properties in Sunningwell and along the Wootton Road.

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NALPG considers that the current proposals for developing Dalton barracks are deficient in a number of respects:

- The case for 'exceptional' need has not been clearly demonstrated, in particular for the more open parts of the site;
- Dalton barracks does not have good road connections, so more sustainable approaches will be crucial and any changes to the road network need to be very carefully considered;
- Land should not be reserved for a Park and Ride at Lodge Hill (page 32). If this can't be withdrawn, another option might be to reserve additional land at to the NW of the Marcham Road / A34 junction so that option can be considered; and
- Land should not be reserved for bus/cycle routes across the Green Belt around Sunningwell (page 32).

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Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☐ Yes

I would like to be added to the database to receive general planning updates

☐ Yes

Please do not contact me again

☐

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Part B – Please use a separate sheet for each representation

Name or organisation: **North Abingdon Local Planning Group (NALPG)**

3. To which part of the Local Plan does this representation relate?

Paragraph

2.126

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes



No

4. (2) Sound

Yes

No



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The proposed Oxford to Cambridge Expressway is only briefly mentioned in the Plan (paragraph 2.126, page 57). This says that a business case will be published in 2017, but this now seems unlikely, perhaps due to a shortage of government funding.

A rough map of optional Expressway routes has been published. Option S1 (improving the existing A34) would potentially affect the A34 along its whole length in Oxfordshire, perhaps widening the existing road to three lanes each way. Routes S2 (towards Bicester) and S3 (towards Wheatley) depart from the Lodge Hill area of the A34. Both run through the Oxford Green Belt. Option S4 starts South of Didcot and runs to the East of Didcot and Dorchester, towards Thame. This grazes the SW edge of the Green Belt, and it is more a Didcot to Cambridge Expressway...

So although the need to improve/reduce traffic flow on the A34 is accepted, most of these routes will have a very severe effect on the countryside of the Vale of White Horse and South Oxfordshire districts.

NALPG has serious concerns about the scale and impact of this development on the area. The road is supposed to enable up to 1 million more houses, in effect 10,000 per mile. The effect of the tens of thousands of extra households strung out along a road through the shattered remains of the Oxford Green Belt, is clearly an issue.

NALPG considers that our local Plan should say more about these options. NALPG will continue to comment further as more details emerge.

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NALPG considers that the plan should say more about the proposed Expressway and set some conditions for its development. For example:

- The Expressway should be a corridor for movement, not an excuse for more development;
- Given the existing excessive amount of land zoned for housing in the Vale, construction of the Expressway should not increase the numbers of houses or other development required in the Vale.
- Construction of the Expressway should not give a green light to further development where it has a junction with the A34, in particular at Lodge Hill.

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