# Comment

Consultee Mr Terence Palmer (1142099)

**Email Address** 

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Comment by Mr Terence Palmer

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Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.

paragraph Additional Sites

Local Plan 2031 Part 2: Detailed Policies and

Q2 Do you consider the Local Plan is Legally

Compliant?

Yes

Q3 Do you consider the Local Plan is Sound? No

Q4 Do you consider the Local Plan complies with No the Duty to Cooperate?

Q6. 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.

Comments specifically in relation to plan options 2 and 3.

Dear Sirs,

I wish to express my considered objections to the developments noted above and strongly urge that options 2 and 3 plan be rejected.

My objections are based on practical observation, personal opinion and a heart-felt desire to protect the heritage of the countryside for the future.

Before proceeding I would like to take the opportunity to state that I am in no way 'anti-development', indeed I have supported the 'infill' development that has happened within East Hanney (the village I personally live in) and the development of the land to the South where approval for 50 further homes has already been approved. My objections are to unnecessary development where I believe profit is the only motivation, I therefore see Option1 as the only sensible way forward.

#### Soundness of Plan

Clearly a lot of money has been spent trying to scientifically justify all of the options in the plan, as is too often the case, this has been done in the vacuum of statistics without looking at the practical, real-life implications of the proposals – or the non-quantifiable element of the continued destruction of countryside and rampant expansion.

The AECOM document which assesses the impact of the 3-option plan appears well developed but is completely at-odds with itself and, as mentioned above, contains no reference or perceived inclusion of the real-life impacts.

Some key observations relating to the plan:

#### 1. The Provision of Houses

A key element of the overall plan rightly centres on the provision of houses to address the perceived shortage.

Focussing again on the elements specific to options 2 and 3 I fail to see this 'shortage' in real, on the ground terms. For example, there are a significant number of properties in East Hanney that are 'not selling' (perhaps because of the proposed development of the area?) and since coming to this village 18 years ago the housing stock has been expanded by close to 70% with these additional proposals potentially adding a further compounded 20%+.

Thus how can there be a 'significant need' when a) properties are not selling but the proposals within options 2 and 3 take the village to nearly double its size since the year 2000?

Section 1 of the document refers to the requirement to "preserve and enhance the quality" of the local area. Building potentially unrequired housing on green-space is clearly at-odds with this requirement and therefore 'unsound'.

Taking any localised view out of the equation the planned options 2 or 3 are quantifiably flawed and therefore not only unsound but a complete contradiction of all the stated aims of the overall 2031 plan.

Based on the numbers shown in the plan Option 1 already provides a **significant excess** of housing – 8% shown in the figures and meats all the 'non profit' aims of the consultation.

I specifically say 'non profit aims' as I can not understand why any further, unnecessary building would be recommended if it were not for purely profit driven motives?

If the Council are truly acting in the spirit of not only providing a necessary level of housing **AND** in preserving the countryside, heritage and environment why would any proposal to build more than necessary even be considered?

The plan Option 1 already provides an 8% excess on what is required, there can be no motive other than profit to go any further.

Additionally, the AECOM plan clearly states that "Option 1 performs the best" across the widest number of criteria and that options 2 and 3 "fail noticeably" on considerations around the environment, waste water management, air/pollution factors and movement.

## 2. Provision of high quality services – "... protection of natural green-space"

Following the comments above the repot itself acknowledges that options 2 and 3 fail around these critical elements and therefore any proposal to proceed with either option 2 or 3 must be flawed and unsound.

### Reduce the need to travel

The overall plan rightly looks at the issues of congestion, alternative travel and noise, air and light pollution.

Options 2 and 3 propose significant developments that are a considerable distance from any significant centres of employment, too far for the 'average' cyclist and therefore dependant on private or public transport.

Whilst public transport in the Vale is high quality expanding it purely to serve the needs created by unnecessary expansion defeats the objectives of reducing the needs for 'mass transit', and the reality is that the majority of people will use private transport.

From personal experience, to get out of East Hanney onto the A338 can take anything up to 7 minutes, getting through the junction at the end of the Steventon Road into Steventon – necessary to get to Milton, Abingdon or Harwell can take the same again. Adding 100's of additional vehicles in the direct area will worsen this considerably. Option 1, which focusses on development nearer to the employment hubs, will minimise this impact AND maximise the chance that public transport may be used.

Light, noise and air pollution I believe to be equally detrimental under all 3 options as any increase in numbers anywhere will affect this. This to me means the only viable course of action is to work to the minimums required which will therefore create the minimum unavoidable impacts. Since Option 1 is already 8% over-target this should be the 'least worse' way forward.

## 7. Improve and Protect the natural environment

Any development outside of 'brown-sites' is unarguably going to impact the natural environment.

Developers 'dress-up' the issue with the creation of so called green spaces within housing developments and planting a few trees but please let's not consider this any kind of substitute for the lost environments, meadows, open fields, farm land that these developments are built over.

Simple logic therefore once again dictates that the best protection for the environment is to have the minimum amount of development if one accepts that some development must happen. In this case Option 1 is viable with it's 8% excess, any further development should not be approved if anything other than profit is the motivation.

## 8. Protect Cultural Heritage

Unnecessary (over quota) development in the quintessential Oxfordshire villages can only be seen as completely contradictory to preserving the heritage of the area.

Yes, development has to happen to deal with the (some might say out of control) population growth but it has to be sympathetic with the 'essence' of the countryside. Development on brown-field sights or in the large towns meets this need, overdeveloping the local villages – which a cynically one might suggest commend higher house prices and greater profits for developers – is contrary to protecting our heritage and therefore unsound.

### 9. Reduce Air, Light and Noise pollution

As already mentioned above, any development can be noting but detrimental to these objectives and therefore consideration should only be given to plans that have the minimum impact.

In this case Option 1 has the least impact, and excess built in, so must be the only considered approach.

### 10. Increase Resistance to Flooding

Much of the proposed development outside of Option 1 is on land prone to flooding. Whilst developers go to great length to highlight their flood prevention measures we have seen over the years, and especially this year, what nonsense these measures often seem to be.

#### In Summary

For the most part the content of the plan is well presented and considered. Where I believe it fails, and is thus unsound, is that despite it's own conclusions it recommends a course of action that conflicts significantly with the key objectives.

It is an unavoidable fact that we need expansion in the Vale but all efforts and focus should be on delivering this with the minimum impact.

Option 1 is stated in the plan as performing the best across all the criteria and at the same time provides capacity above the required level. The other 2 options have some spot benefits that I believe to be profit motivated but FAIL SIGNIFICANTLY on considerations around the environment, pollution and over-stress the ability to deal with existing levels of water supply and wastewater treatment.

Anything other than Option 1 should be rejected.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, No - I do not wish to participate at the oral do you consider it necessary to participate at the examination oral part of the examination?

Would you like to hear from us in the future?

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