

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Ms Paulette Burns
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Consultation Point	Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area (View)
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Q1 Do you consider the Local Plan is Legally Compliant?	No
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Unsound because it would have significant impact on the area, in terms of visual impact, traffic generation, and sustainability and because it fails to present a convincing reason to destroy Green Belt land for reasons outlined below:

The Green Belt is meant to prevent neighbouring towns merging into one another. In this case the proposed plans would compromise the neighbouring towns and villages of Abingdon, Sunningwell, Radley and Kennington and their relation to the special character of Oxford and its landscape setting. The proposed plans also fail to preserve the special character of the historic town of Abingdon by

increasing its sprawl towards Sunningwell and effectively subsuming village of Radley. The plans fail to safeguard the countryside from encroachment, in fact do the exact opposite.

The existing landscape is rural and characteristic of the local area. Development on such a large proportion of Green Belt land, effectively building a village sized settlement, will destroy the integrity of this landscape.

The strategy's own consultants state that in the urban fringes and important open gaps between settlements, development or changes of use which would harm their essentially open or rural character will not be permitted. It calls for development on a reduced area and for the distinctive character of Lodge Hill to be respected.

The development will destroy hedgerows, disturb wildlife, contribute to dwindling numbers of farmland birds and destroy ecological corridors. Although the strategy promises not to remove any trees, how likely is that in reality, and how healthy will the environment be for existing trees and hedgerow links to Sugnell Copse and Blake's Oak as a result of massive housing and traffic noise and pollution.

There are no proposals to offset the overall loss of landscape quality, historic character heritage settings and wildlife by enhancing protection of other areas on a comparable scale.

The strategy itself states, "Housing should be designed to a density that is appropriate for the location. Development should make a positive contribution towards local character and distinctiveness." Clearly a development of 1000+ houses on green belt land fundamentally fails to do either.

Government guidance states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt. The local authority has failed to make a case for very special circumstances, indeed has ignored advice from its own consultants as well as the local community.

Unsound because it will have severe transport implications for residents of north Abingdon, Radley and Sunningwell. Such a large number of houses will create severe transport problems. At a conservative estimate, more than 1000 houses will likely result in 1300+ extra cars using Dunmore Road, given how many households have more than one vehicle. This will add to existing congestion and also increase pollution issues.

Although the strategy claims that Abingdon has excellent public transport links, these are only via buses into Oxford. It has very poor links with other towns and employment areas such as Didcot and Wallingford. It fails to make anything of proximity to rail stations at Radley and Culham. If new jobs are created in the region as a result of the Science Vale strategy or similar, it does not follow that employees will see north Abingdon as an attractive and convenient location to live given the current traffic issues and density of homes. The infrastructure improvements need to come first.

A key infrastructure requirement of the Local plan is to "deliver a high quality and sustainable urban extension to Abingdon-on-Thames which is integrated with Abingdon-on-Thames so residents can access existing facilities in the town". In fact at present the housing estates in north Abingdon are poorly integrated with the town centre. There is no cycle route from here direct into Abingdon town centre; there are no bus links on Dunmore Road for residents unable to cycle or walk into the town centre. There is a huge over-reliance on private cars for transport, evidenced by traffic jams on Dunmore Road and down the Oxford Road into the town centre at peak periods. The 30mph Oxford Road into Abingdon and 50mph section towards Oxford past Sunningwell do not have cycle lanes. The Oxford Road into Abingdon is very poorly maintained in terms of road surface. As mentioned above, transport links to towns other than Oxford are poor. Dedicated cycle lanes would need to be created along all important routes from north Abingdon to Abingdon town centre, Oxford, Culham Science Park and Milton Park - but where is the financial commitment for such infrastructure?

Traffic exiting Boulter Drive onto Dunmore Road is already at risk. The primary school and GP surgery on Boulter Drive create a large amount of traffic. The 40mph speed limit on Dunmore Road is much too high for a residential area. As recently as 10 December 2014 there was a collision at Boulter Drive / Dunmore Rd junction. Creating a huge amount of increased traffic is clearly unsound.

Unsound because it fails to present supposed measures to create necessary other infrastructure and facilities

Although the plans call for a 2.2 hectare site for a primary school, there is no mention of provision of new GP and dentist surgeries, surely a requirement for plans which will likely create a new population

of several thousand people. Only last week there were reports of how massive new developments in Didcot were failing to provide residents with promised infrastructure.

Flood risk not explained to any level of effectiveness: ?Site is considered a high risk to groundwater?. Part of the area is also prone to surface water flooding. This is the current situation ? what modelling work has been carried out to estimate future flood risk after 1000+ new homes, gardens, parking, roads, primary school, police station, shops etc are built? The plan is unsound without this type of information.

Because of the absence of any adequate description of the environmental characteristics of the areas earmarked for development, or what flexibility of design would be available within the density of development per area that is envisaged for each site ? or the typical sources of impact that would typically arise for that type of development it is impossible to give any indication of the nature of environmental effects actually likely to arise for any of these topics, let alone whether they are likely to be significant. The plan is therefore not positively prepared or effective.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

? Modification to make the Local Plan sound: much lower housing figures (based more closely on the Government's own household projections) should be used by the Vale in its Local Plan. ? Modification to make the Local Plan sound: Needs to be explicit about finance available for necessary infrastructure. It should be shelved until major improvements to the Lodge Hill A34 exchange are delivered, including enhancement of public transport and cycling infrastructure, eg park and ride schemes to Oxford, Abingdon centre, Culham Science Park and Didcot and Radley train stations; cycle hire and dedicated cycle routes (ie not shared pedestrian/cycling lanes) to Abingdon town centre, Radley and Didcot train stations, Oxford Redbridge and /or Oxford city centre. Such development will also support the Science Vale UK Area Transport Strategy. ? Modification: The Inspector should strike from the Local Plan all site allocations in the Green Belt and North Wessex Downs. Once the road and cycling infrastructure is in place, the Local Plan should be drastically revised to stay in keeping with the existing landscape, ie protecting the Green Belt. Even without the Green Belt sites, the Vale would still be proposing nearly 19,000 new houses in 15 years (which some believe to be unachievable anyway). ? The sites in the Oxford Green Belt that have been identified for housing should be withdrawn from the Plan and if necessary the total programme reduced accordingly. All sites currently proposed for removal from the Green Belt should be left as they are. ? Modification: No piecemeal housing development should be allowed unless carried out hand in hand with development of facilities for residents eg shops, GP surgery.

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, do you consider it necessary to participate at the oral part of the examination? No - I do not wish to participate at the oral examination