

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Cumnor Parish Council (Philip Hawtin)
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Consultation Point	Core Policy 1: Presumption in Favour of Sustainable Development (View)
Status	Submitted
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Version	0.2
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.

Unsustainability? The National Planning Policy Framework identifies three requirements for sustainable development ? economic, social, and environmentalEconomic? The NPPF requires plans to identify and coordinate development requirements, including the provision of infrastructure. The Plan identifies infrastructure requirements in its nominated sites, but offers inadequate assurance that they will be carried out in a timely and coordinated way. Indeed, at a Vale public meeting on the Housing Supply Update, Spring 2014, a senior councillor accepted explicitly that infrastructure would follow rather than accompany development and that there was a risk that this would lead to some degradation of

services. Road capacity is a major case in point with well-documented overloading on the main roads in the District and on many of the minor roads at the points where they join them. To quote from the Oxfordshire Local Economic Partnership's SEP itself:

Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees.

The recent announcement of 50m funding for improvements to the A34 is welcome, but it is widely recognised as a palliative measure for easing the pain of congestion. In the long-term there will remain capacity issues on the A34 and much more substantial improvements will be needed in the long-term. Apart from the A34 and A40, there are major traffic problems on the A420, A338 and, on the A415 and the A417. The proposed improvements to access to the A34 through slip roads at Chilton and Lodge Hill and the doughnut roundabout at the Milton roundabout may make it easier to get on to the trunk road but ignore the fact that it is already grossly overloaded for much of the day. The Plan does not consider improvements to the A420. Oxfordshire County Council will not be finalising its A420 transport strategy until after the end of the Vale consultation period (19 December) and is reported as saying that the A420 'corridor issue' must be considered in partnership with Swindon Borough Council as together they 'own' the A420. Thus all the critical issues affecting the Western Vale Villages, i.e. infrastructure and housing numbers - will remain uncertain for months to come. There is a complete absence of reassurance about the availability of adequate medical support in any of the developments in the Plan (Infrastructure Delivery Plan para 11.3). The Vale appears to be relying on CIL funding to provide the necessary infrastructure. However the infrastructure needs to be provided in anticipation of the proposed developments. If the developments do not come forward on the timescale adopted by the Vale there will be a serious funding shortfall. The Plan implicitly acknowledges this fact when in Chapter 4 page 40 it writes 'If housing growth does not take place in the ring-fence area, Enterprise Zone and other business growth would be harmed and business prospects rates? contributions to infrastructure provision jeopardised.' Surprisingly having recognise this problem the Vale does not develop the point further. Social? I support the CPRE's comments concerning the social and environmental issues.

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.

No Plan should be approved until the NHS has provided the necessary assurance that appropriate medical resources will be provided. Sites should not be included in the Plan unless the Vale is able to demonstrate that the infrastructure can be supplied in a timely manner. The Vale should critically review the figures emerging from the SHMA to avoid the unsound aspects highlighted above, and to prepare an appropriately revised plan.

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