

To:
Planning Policy Department
Vale of White Horse District Council
Via email

From:

David and Gemma Fraser
16 Whites Lane
Radley
Abingdon
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Re: Vale Local Plan Consultation comments
18th December 2014

We wish to object to the VOWH Local Plan Part 1 2013 on the grounds that it is unsound. Our reasons are outlined below:

Core policy 4 and others which flow from it (in particular core policies 8, 13, 15 & 20):

Strategic Housing Market Assessment

The strategic Housing Market Assessment is unsound. It relies unquestioningly upon the draft Oxfordshire Strategic Economic Plan (SEP), which was produced by the Oxford Local Enterprise Partnership an unelected and democratically unaccountable body, whose remit and objective by definition is economic growth. No consultation was undertaken over the SEP, which seems highly irregular and deeply undemocratic. In abolishing the previous South-East plan, Government assured the public that localism agenda in whose name it was abolished would ensure greater control over local decision making. Nothing could be further from the truth; the previous South-East Plan was subject to extensive public consultation, whereas the SEP (which underpins the SHMA) has been exempt from scrutiny.

The housing figures within the SHMA are over two and a half times those suggested by the Government's official household projections.

To accept the SHMA figures without further scrutiny despite the abundantly apparent extent and strength of opinion against its targets, would be deeply undemocratic.

The housing figures arrived at are based on aspiration for growth, as opposed to need. Housing targets should also factor in environmental, social and infrastructure constraints, although it appears that no formal scrutiny of the SHMA targets in this respect has been undertaken by VOWH councillor other and subsequently reflected in the SHMA targets. The Habitats Regulations assessment (HRA) is narrowly focussed on the specific requirements of the Habitats Regulations on SAC and SPA sites, which represent a tiny proportion of the Vale's area, and important as this is, it cannot be considered a holistic assessment of the environmental, social and natural capital implications of the plan.

Core policy 7: Infrastructure

The plan provides no guarantee for the infrastructure which will be essential to support any increase in housing levels within VOWH district. Having attended several public meetings with VOWH representatives, little assurance was provided with respect to infrastructure, for example in relation to a south facing slip road to the A34 at North Abingdon.

However one of the main concerns based on representations at public meetings is the impact of increased motor vehicles. Traffic levels in the VOWH district are already critically high, to the extent that they impair the quality of life of residents. Further increases will exacerbate this situation.

Any further housing development should thus seek to minimise the requirement for vehicular traffic, and sustainable transport options should be a central tenet of proposed sites. Cycling in particular provides an ideal means of short and medium range commuting. Despite this, and a groundswell of popularity for cycle commuting, cycling provision receives little more than lip service in the Local plan. There is a great opportunity to facilitate cycling as a low-carbon, low impact, sociable and healthy means of transport and contribute to the quality of life of Vale Residents. This has not been capitalised upon in the current plan.

Core Policy 8 – Spatial strategy for the Abingdon and Oxford Fringe

The level of housing allocations have resulted in a number of sites being allocated to Greenfield areas within Abingdon and the Oxford Fringe. The national Planning Policy Framework makes it clear that house building in greenbelt should only be undertaken in “exceptional circumstances”. Subsequent guidance issued in March 2014 states that unmet housing need is unlikely to outweigh the harm to the green belt. Unmet housing need does not constitute “exceptional circumstances”, and should not be pursued.

The extension of the North Abingdon site east of Oxford Road into Peachcroft Farm was not included in the April consultation document. The February 14 green belt review did not recommend that this area was withdrawn from the green belt. Therefore notwithstanding my overall objection to development within green belt sites, I particularly object to this site being included within the plan.

Core Policy 4: The consultation process has been poor

The report to the council about the consultation process ignore important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and the public meetings convened to discuss the plan. We therefore believe the Plan has not been positively prepared. We understand that 500 separate objections from residents of Radley were counted as one comment as they used the same template, which is deeply flawed and undemocratic.