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I have serious concerns about the current version of the Local Plan 2031 and the fact that it substantially -- if not completely -- ignores the massive volume of constructive criticism and comment by local councils/organisations and individuals made in response to the public "consultation" earlier in '14. Accordingly I wish to formally register my objections to the Plan as part of the current pre-EIP exercise. Because the Plan is significantly in breach of the requirements of the NPPF, VWHDC is in breach of its statutory obligations and hence the Plan is fatally flawed. It does not protect the environment, does not build healthy and sustainable communities, does not support sustainable transport and accessibility, and does not support economic prosperity [except possibly for those adjacent to 'Science Vale']. It is despicable that VWHDC denied the general public access to comments made as part of the earlier Local Plan consultation until literally days before the current Nov '14 exercise began.

1. Until very recently, over the entirety of the Vale's existence - irrespective of the political party in power - the key planning strategy applied was the protection of the historic rural nature of the Vale and its villages. Accordingly housing development was centred on Abingdon/Botley and the market towns of Wantage/Grove/ Faringdon, while the rural villages/hamlets would take only appropriate small-scale infill within existing village/hamlet boundaries [hence the "exceptions policy" for social housing]. The current reversal of this policy means that VWHDC is in breach of the obligation in NPPF 12 of "conserving and enhancing the historic environment ", and the Vale's own SHLAA notes at Para.5.8 that "development of sites outside the built-up area of a settlement would be contrary to current Local Plan saved policies ".

2. The Western Vale Villages Consortium provided VWHDC with an independent Transport Consultant's report which showed that, 3 years ago, even before year-on-year traffic growth was allowed for and before recent housing permissions along the A420 were granted, the A420 was overloaded. Other than a passing reference in the most vacuous terms, the Local Plan 2031 ignores this massive infrastructure issue entirely in breach of NPPF4 and has nothing to offer towards upgrading the A420 to help mitigate existing traffic congestion, let alone provide for the consequential significant increase in commuter traffic as an outcome of the massive increase in housing either already permitted or proposed additionally in the Plan. It is a nonsense for VWHDC to try to finalise housing plans against a background where OCC will not even fully commence its Transport Strategy work until early next year ie after the Vale's current "consultation" will have closed. For example, implementation and completion of significant improvements to the A420 should be a precondition of any housing development in the Western Vale

The Vale's attitude is in complete denial of the misery of the day-to-day reality for many regular road users; for example, even without accidents/road-works, on at least a twice-daily basis and for several hours at a stretch, at certain

times of the day traffic stacks up from the Swindon A419/A420 White Hart roundabout back into Oxon beyond the Shrivenham Bypass and past Watchfield as far as Faringdon. This inevitably leads to rat-running by cars/vans/heavy lorries with resultant adverse consequences for local villages/hamlets. NPPF Sections 4, 11 & 12 refer.

To the west in the neighbouring borough of Swindon, a large housing planning application [for land east of the A419 with access to be on/off the A420] was put on ice by the Highways Agency a year or so ago because the application did not address the issue of A420 highway infrastructure improvement. [VWHDC is well aware of this but has learned nothing from it, despite public recognition in an "issues" statement they agreed jointly with Oxon CC/Swindon BC of the national importance of the A420 as a major arterial road and the implications of the eastern growth of Swindon as outlined in Para. 3 below]. It is to be hoped that the Highways Agency will take a similarly sensible and icy approach when dealing with the Vale's wet-dream Local Plan fantasies.

3. The proposed expansion of Swindon eastwards from the A419, to both the north & south of the A420 and up to the Oxon boundary, is planned to accommodate 8,000 to 10,000 houses, employment sites creating 5,000+ new jobs, a new District Centre incorporating retail units/primary & secondary schools /medical & social etc. services. Infrastructure to support this massive development is to be based across the county border in Oxon viz. sewage treatment/water/link roads north to A419 & south to M4 etc etc. Currently there are planning applications lodged with Swindon BC for {1} nearly 3,000 houses in this area and {2} the first 2,000-job phase of a major warehousing development. A massive project on this scale within 1/2 mile of Bourton and 1 mile of Shrivenham hardly merits a mention in the Vale's Local Plan although the outcomes -- including the possibility/probability of coalescence with Swindon, as well as the possible Swindon infrastructure impositions outlined - - are of massive significance for the people at the western end of the Vale. NPPF Sections 3, 4, 8, 11 & 12 are being wilfully ignored by VWHDC.

4. On 7 March I received the Vale notification of the SHMA figures & read the full report using the link. I took their housing need figures of 1,028 p.a. X 20 years = 20,560 houses between 2011 - 2031 with a large pinch of salt since the last couple of paragraphs in their report essentially said that these were "ideal" figures and took no account of practical constraints like topography/infrastructure/local economy etc. Although I would have expected the Vale as a Council to have fully considered the full implications of these constraints plus social and other impacts before settling on a target figure, VWHDC has accepted without demur these SHMA figures as its housing target without any consideration of, and is consequently in breach of, the Govt. guidance quoted at Para.4.11 on P.25 of the SHMA report viz. that "environmental constraints or issues related to congestion and local infrastructure" are "very relevant issues in considering how much development can be sustainably accommodated and where new development should be located". NPPF Sections 3, 4, 8, 11 & 12 refer.

4.1 There is no way in which the Western Vale's infrastructure could support the sort of housing numbers proposed or provide the jobs that could support them. The "Western Vale" is meant to pick up 10% of the housing total ie 2,000+ houses according to the Local Plan, but there just aren't the jobs here to support even a fraction of that figure -- the "Shrivenham Business Park" in Watchfield hosts a small number of mostly Swindon "one man and a dog" companies employing Swindon people; the Defence Academy via SERCO employs a relatively small number of people in cleaning/catering jobs, but mainly the Defence Academy simply imposes added infrastructure stress via its demands on schools/GP services/roads etc. Faringdon has had a substantial amount of existing employment land available for over 10+ years without any interest from developers or others despite both Government and local initiatives.

The proposed substantial housing growth in the Western Vale is designed merely to support significant employment growth in the Eastern Vale in the A34 Science Vale Enterprise Zone at Harwell/Milton/Oxford. This is despite all the unaddressed A420 problems, and despite the lack of alternative transport such as rail, and despite the mandate in NPPF 4.34 that the need to "travel to work" should "be minimised", and despite the NPPF Para.158 requirement that "strategies for housing and employment in local plans should be integrated". NPPF 3, 4, 8, 11 & 12 also refer.

4.2 This sort of housing/employment dysfunctionality in the Western Vale means that new social problems - with consequent social costs for the people concerned and the wider community - are being created locally.

Understandably, for example, families who can't get social housing in Oxford city are moving to Faringdon for social housing; but there is no local employment available for them, they have no links within the local community, they have no transport except local [relatively expensive] bus services to get to potential employment centres like Swindon/Oxford, and hence avoidable social problems ensue NPPF 3, 4 & 8 refer.

4.3 Essentially what is now proposed means that the Vale villages will become glorified dormitories for A420 commuters to Swindon/Oxford/Harwell. Even though "houses need to be provided to support economic growth ", these should not be where their location "will result in unsustainable commuting patterns"; also housing should be located "where businesses are able to grow and recruit new staff who will be able to live locally". Since the Vale's villages don't have rail links, the A420 is the main transport artery ---- but it's overloaded ! And commuting from the western Vale to anywhere near the A34 employment hub otherwise than on the A420 is a rat-run nightmare of rural 'B' or unclassified roads [plus tractors and other farm vehicles !] .

4.4 The Local Plan 2031 shows that Shrivenham is due to pick up another 500 houses on top of the 135 already agreed and the 294 currently awaiting decision ie potentially a total of 929, and a Theoretical Housing Potential in Shrivenham of 1,286 [deliverable] in years 0-5 and 398 [developable] in years 6-15, ie a total of 1,684.

Shrivenham is a village of just over 800 homes, with a conservation area in its centre providing shops/GP/primary-school/postal etc facilities for the local

community and the neighbouring smaller villages/hamlets. There is no spare space in the High Street which would allow existing businesses/services to expand to meet the level of demand generated by housing growth on the scale envisaged, viz. 115% to 200%+ ; undoubtedly this would lead to another significant and competing retail/services greenfield development elsewhere in the village in competition with the High Street, with potential adverse consequences for the future of the High Street/conservation area. In social terms, doubling or tripling the size of the village would decimate the strong social bonds that currently exist in this vibrant community and would effectively destroy the Shrivenham village that so many locals voluntarily devote so much time & effort to help sustain.

5. Based on the SHMA projections, VWH is taking a proportionately bigger housing 'hit' than neighbouring authorities which will reap the employment benefits of their proximity to the "Science Vale Enterprise Zone. In the interests of equitability and proportionality, it would be appropriate for neighbouring councils to take a larger share of the housing pain as a quid pro quo for the economic gain. NPPF 3, 4 & 8 refer.

6. The 2013 iteration of the Local Plan identified a need for 14,300 jobs which the Local Plan '14 had increased to just under 23,000. However there is no increase proposed in the employment land need figure of 143 hectares shown in the '13 version. NPPF 3 refers.

7. For many years Thames Water's alleged need for a new reservoir cast a planning blight on a big chunk of the Vale and cost VWHDC a lot of money to successfully oppose. If the sorts of housing numbers quoted in the '14 Plan and the Local Plan 2031 gain credence, Thames Water will be back again hammering away about the imperative need for a new reservoir, and this will re-inflict the planning blight that for many years accompanied their previous efforts. This significant environmental issue has been ignored despite SHLAA Para.2.5's acknowledgement that "infrastructure and services are vital when looking at the development of new housing".

8. To classify Uffington as a 'larger village' in the Local Plan is a travesty in the light of what this classification has meant for Shrivenham. Uffington is in the foothills of the Ridgeway, is just below the 5,000-year-old Uffington White Horse, and is clearly visible from there and elsewhere on the Ridgeway. NPPF 11 & 12 refer.

9. The Ox Local Enterprise Partnership, which appears to be an opaque private sector-led organisation, seems to have had a significant influence on the draft Ox Strategic Economic Plan, which seems to have been a major influence on the SHMA. Despite the SHMA leaning on this to inform its housing study, there is no public visibility of this report or any form of independent review or professional assessment of its link to reality, as most of us experience it daily. The last thing any of us need is another X years of planning chaos based on castle-in-the-air housing-need figures built on 'expert' -- albeit not independently or expertly assessed -- economic wish-list thinking purporting to be a realistic plan/forecast. I understand that CPRE

initiated an independent review which showed that the SHMA is not compliant with the NPPF.

10. In addition to the above comments, I would wish to be associated with the comments of the WVV and CPRE.

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