

**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

**Response form for the Vale of White Horse strategic planning policy document., the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.**

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title

Dr

First Name

Andrew

Last Name

Turner

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

17 Loyd Close

Line 2

Abingdon

Line 3

Line 4

Post Code

OX14 1XR

Telephone Number

01235 529297

E-mail Address

(where relevant)

[andrew.d.turner@btinternet.com](mailto:andrew.d.turner@btinternet.com)

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph	4.8, 4.14, 4.15, 4.25- 4.31, 4.33	Policy	CP 3	Proposals Map	3 page 7, 9
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4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<b>NO</b>
4 (3) Complies with the Duty to co-operate		<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

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Core policy 3 needs to be qualified as to its suitability in meeting other core policies. Some locations within a town may be less suitable due to issues of loss of green belt habitat and amenities, and increased traffic and pollution. Existing facilities may not be able to cope with the proposed local level of housing increase.

The proposed sites in North Abingdon are next to a 'Market Town'. However they are in the Green Belt, in an area with already congested roads. The nearest employment site at Radley Road Industrial Estate is over 3 km away from the centre of the Dunmore Road site (not 2.1 km as specified in SA Report Appendices p.123). That has no room for expansion. Other new employment sites, which will provide the bulk of new jobs (70% estimate) are considerably further away on busy roads in Culham (5.8Km), Milton Park (12.4Km) Harwell (16.4Km) or Oxford (8.9Km).

So as the main new employment sites are outside Abingdon altogether, why build so many houses next to Abingdon?

6. 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 at 5 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.

I am very concerned about existing traffic problems and consider that the new development will make

things worse

I am also concerned that air pollution in Abingdon-on-Thames will increase due to congestion on Dunmore Road and Twelve Acre Drive will no longer be able to divert traffic from the centre of town – thus exacerbating the AWMA issues rather than providing a solution.

The only solution is not to build houses in this part of Abingdon.

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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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**No**, I do not wish to participate at the oral examination

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Yes

**Yes**, I wish to participate at the oral examination


8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I am attaching a topic report on the "Impact on traffic in Abingdon" as a result of the proposed Vale of White Horse Local Plan. This has been prepared on behalf of the North Abingdon Local Plan group.

I am prepared to speak to this, if required by the inspector at the EIP.

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Signature:



Date:

16<sup>th</sup> December 2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph	4.13-4.15, 4.25, 4.33, 6.45-6.47	Policy	SO 3	Proposals Map	3 page 7, 9
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The Plan fails to meet Strategic objective 3 in respect to Abingdon. As 70% of the new jobs identified in the Vale plan are associated with the Science Vale to the south of Abingdon, the houses proposed to the north and north-west of Abingdon on Green Belt land will severely exacerbate existing traffic problems on both local roads and A34.

In the proposed North Abingdon development, "Dunmore Road and Twelve Acre Drive would cause severance for the site and pedestrian crossings would need to be implemented" (SA Report Appendices p.119) including a crossing on the Oxford Road up Lodge Hill (joining two parts of the proposed development). Roundabouts would also be needed in order to allow vehicles to exit estate roads. Thus the site could only comply with SO3 if Dunmore Road and Twelve Acre Drive becomes a residential road rather than a ring road with a 30 mph speed limit. This would cause severe congestion elsewhere in the town.

As a result, this will make Abingdon a LESS attractive place to live.

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I am very concerned about existing traffic problems and consider that the new development will make things worse

I am also concerned that air pollution in Abingdon-on-Thames will increase due to congestion on Dunmore Road and Twelve Acre Drive will no longer be able to divert traffic from the centre of town – thus exacerbating the AWMA issues rather than providing a solution.

The traffic congestion will make this a less attractive place to live. Local air pollution will make air quality poor for young children and elderly alike as well as causing significant health problems and reduced life expectancy. A recent report from the Commons Environmental Audit Committee has recommended that schools should NOT be built near main roads (>150 metres).

Also loss of open space Green Belt amenities will also make the area less attractive to residents.

It would therefore be a mistake to build the houses to the North of Abingdon. They should be located within 5 miles of the main employment sites in the Science Vale.

**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.

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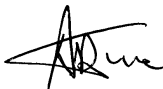
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Paragraph	2.8, 6.71, 6.105	Policy	SO 4	Proposals Map	3 page 7, 9 E14
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Placing housing to the North/north-west of Abingdon when the main employment opportunities are to the south of the town will place additional stresses on the road network; the distances are such that walking and cycling are not really an option; buses do not currently serve these routes. The vulnerability of A34 and lack of alternative routes leads to severe congestion at peak times, and at other times if there is an incident on it. Increased traffic through Abingdon to Culham Science Centre, and round the orbital road will increase air pollution in the town – with a significant contribution to excess early deaths – in particular when considering an aging population, especially when it is noted that Abingdon is an Air Quality Management Area – thus having an adverse impact on health and well-being of Vale residents.

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The traffic congestion will make this a less healthy place to live. Local air pollution will make air quality

poor for young children and elderly alike as well as causing significant health problems and reduced life expectancy. A recent report from the Commons Environmental Audit Committee has recommended that schools should NOT be built near main roads. Also road safety will become a major issue with the need to install pedestrian crossings and a probable reduction in speed limit to 30mph.

Also loss of open space Green Belt amenities will also deny residents the opportunity for walking in the countryside – of benefit to physical and mental health.

It would therefore be a mistake to build the houses to the North of Abingdon. They should be located within 5 miles of the main employment sites in the Science Vale.

**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.

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Paragraph  Policy  Proposals Map

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The Plan fails to meet Strategic objective 7 in this respect t Abingdon. As 70% of the new jobs identified In the Vale plan are associated with the Science Vale to the south of Abingdon, the houses proposed to the north and north-west of Abingdon on Green Belt land will severely exacerbate existing traffic problems on both local roads and A34.

The cost of modifications to both local roads and Highways that would be required to manage the increase in traffic and pollution will far exceed the Community Infrastructure Levy (and other sources of funding). The funding of the required new A34 interchange at Lodge Hill (N. Abingdon) is to come partly from the LEP (Infrastructure Delivery Plan Appendix 1) but there is no guarantee that this will be forthcoming. Widening of the A34 from M40 to Chilton has been estimated to be £800M. A second river crossing and link roads would further increase the bill.

Necessary improvements to Dunmore Road and Twelve Acre Drive are to be funded by the County Council (Infrastructure Delivery Plan Appendix 1) but continuing cuts to local government funding mean they are unlikely to have the money for this. A crossing on Lodge Hill is essential as it is difficult to cross (and there was a recent fatality here). However, a crossing will slow traffic flow further

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Widening the A34 (M40 to Chilton), a second River Crossing and link road to Culham, a full diamond Junction at Lodge Hill A34 and roundabouts on Twelve Acre Drive and Dunmore Road would be needed to ameliorate the traffic problems of the additional housing developments to the north of Abingdon.

**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.**

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The vulnerability of the A34 is a critical factor – requiring a diamond junction at Lodge Hill (N. Abingdon), as well as additional lanes between M40 and Chilton, and possibly a southern bypass and river crossing. This needs to be in place before any housing development, otherwise traffic congestion within Abingdon will become impossible during lane closures for widening. There are no plans at all to widen the A34 in the Chancellor's recent statement on £15Bn road investment.

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The recently published Government Roads plan does NOT include any of these upgrades. As a result, they will not be available in time to support the proposed development timescale.

**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.*

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This strategic Objective is to maintain and enhance the vitality and viability of the Vale's town centres and local shopping centres in order to strengthen their service centre roles.

As 70% of the new jobs identified in the Vale plan are associated with the Science Vale to the south of Abingdon, the houses proposed to the north and north-west of Abingdon on Green Belt land will severely exacerbate existing traffic problems on both local roads and A34. This will result in an adverse effect in Abingdon itself, thus reducing its viability.

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This development at the North of Abingdon makes little contribution to the operation of Abingdon as a Market Town – but simply a dormitory for other employment centres. It is critical to solve the town traffic problems – this will only be achieved by by-passes and locating housing nearer the employment

opportunities.

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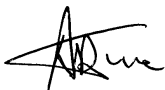
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As 70% of the new jobs identified in the Vale plan are associated with the Science Vale to the south of Abingdon, the houses proposed to the north and north-west of Abingdon on Green Belt land will severely exacerbate existing traffic problems on both local roads and A34.

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Paragraph	2.13, 4.2, 4.3, 4.8, 4.13, 4.14, 4.15, 4.25 – 4.31, 4.33, 5.4, 5.6, 5.7	Policy	SO 8	Proposals Map	3 page 7, 9 E14
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As 70% of the new jobs identified In the Vale plan are associated with the Science Vale to the south of Abingdon, placing housing to the North/north-west of Abingdon will place additional stresses on the road network; the distances are such that walking and cycling are not really an option; buses do not serve these routes. The vulnerability of A34 and lack of alternative routes leads to severe congestion at peak times, and at other times if there is an incident on it. Increased traffic through Abingdon to Culham Science Centre, and round the orbital road will increase air pollution in the town.

In order to promote sustainable modes of transport – walking, cycling and bus – the distances from house to work should be 1 mile, 5 mile respectively. The houses should therefore be located nearer to the Science Vale – where 70% of the new employment will be located.

6. 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 at 5 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

I am very concerned about existing traffic problems and consider that the new development will make things worse  
I am also concerned that air pollution in Abingdon-on-Thames will increase due to congestion on



Dunmore Road and Twelve Acre Drive will no longer be able to divert traffic from the centre of town – thus exacerbating the AWMA issues rather than providing a solution.

The houses should therefore be located nearer to the Science Vale – where 70% of the new employment will be located – thus reducing the commuting distances and opening up the possibility of cycling and walking to work as more environmentally-friendly modes of transport. In order to promote sustainable modes of transport – walking, cycling and bus – the distances from house to work should be 1 mile, 5 mile respectively.

No bus routes are currently available from Peachcroft and Long Furlong to the Science Vale and would need to be provided.

**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.

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7. 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

☐

Yes

Yes, I wish to participate at the oral examination


8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I am attaching a topic report on the “Impact on traffic in Abingdon” as a result of the proposed Vale of White Horse Local Plan. This has been prepared on behalf of the North Abingdon Local Plan group.

I am prepared to speak to this, if required by the inspector at the EIP.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

16<sup>th</sup> December 2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph  Policy  Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input type="text" value="NO"/>
4 (3) Complies with the Duty to co-operate		<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. 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.

The proposed housing in North and north-west Abingdon will be right alongside the A34 – with attendant noise and pollution problems that will be difficult to mitigate. Developing the A415 will have the effect in INCREASING traffic through the town unless an eastern bypass were constructed avoiding Bridge Street. Recent Government Guidance advises that significant lung impairment in young children is observed within 150 metres of major roads due to NO<sub>2</sub> and particulate pollution.

6. 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 at 5 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

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I am also concerned that air pollution in Abingdon-on-Thames will increase due to congestion on Dunmore Road and Twelve Acre Drive will no longer be able to divert traffic from the centre of town – thus exacerbating the AWMA issues rather than providing a solution.

Building houses so close to the A34 to the North and North-west of Abingdon will result in significant noise and atmospheric pollution for residents. They should not be build there, as no mitigation mechanism would be sufficiently effective.

**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.*

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Signature:



Date:

16<sup>th</sup> December 2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph	5.8, 6.45 – 47, 6.55, 6.57, 6.71, 6.73, 6.78, 6.79, 6.105	Policy	Core 33	Proposals Map	3 page 7, 9, E14
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4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<b>NO</b>
4 (3) Complies with the Duty to co-operate		<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. 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.

Placing housing to the North/north-west of Abingdon when the main employment opportunities are to the south of the town will place additional stresses on the road network; the distances are such that walking and cycling are not really an option; buses do not serve these routes. The vulnerability of A34 and lack of alternative routes leads to severe congestion at peak times, and at other times if there is an incident on it. Increased traffic through Abingdon to Culham Science Centre, and round the orbital road will increase air pollution in the town.

The proposal does not in any way help with access to Oxford. It already takes an hour to travel the 6 miles from N. Abingdon to the centre of Oxford at peak times, and the huge number of additional vehicles on the A34 from the new developments will increase this significantly.

6. 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 at 5 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

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The only solution in not to build houses in this part of Abingdon.

**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.

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Date:

16<sup>th</sup> December 2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph	6.68-6.70	Policy	Core 34	Proposals Map	3 page 7, 9, E14
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4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<b>NO</b>
4 (3) Complies with the Duty to co-operate		<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. 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.

The vulnerability of the A34 is a critical factor – requiring a diamond junction at Lodge Hill, as well as additional lanes between M40 and Chilton. This needs to be in place BEFORE any housing development, otherwise the additional burden on traffic congestion within Abingdon will become impossible during lane closures for widening.

The recent government announcement on roads includes only CTV and information signs for the A34 (and minor changes to approach roads to 2 junctions north of Oxford). This will let drivers know how many miles long the queue is but will do nothing to prevent the frequent long queues.

6. 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 at 5 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

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The proposed housing developments to the north and north-west of Abingdon will only exacerbate local traffic problems within Abingdon and on the A34. As a result, the houses should be located elsewhere – ideally within walking/cycling distance of the new employment opportunities.

**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.

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☐

Yes

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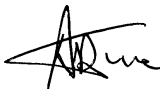
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Signature:



Date:

16<sup>th</sup> December 2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph	6.55, 6.57, 6.71, 6.73, 6.78, 6.79, 6.105	Policy	Core 35	Proposals Map	3 page 7, 9, E14
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4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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6. 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 at 5 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

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In order to encourage the use of cycling and walking to commute to work would only be possible if the housing were located within 5 miles of the employment opportunities in the Science Vale – NOT to the north of Abingdon – which already has a dysfunctional road system.

There are also currently no bus services along Dunmore Road and Twelve Acre Drive that connect to main employment locations, which would otherwise need to be provided – complete with lay-bys, so as not to impede traffic flow.

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