

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Ashley Poyton
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Consultation Point	Core Policy 4: Meeting Our Housing Needs ( <a href="#">View</a> )
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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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** No

**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.**

**Core Policy 4 & all others that flow from it [particularly 8,13,15 & 20]**

This development is based on a flawed and overstated Oxfordshire Strategic Housing Market Assessment (SHMA) that has already been criticised for its inaccuracies by organisations such as CPRE and politicians alike. Some experts say that the housing assessment is double the actual housing requirements of the county.

The SHMA forecast is based on overstated forecasts of new jobs to be created in the county. Most of this work is due to be created in South Oxfordshire, yet the proposed developments are in the Northern part of the county.

Both the SHMA and job forecast are estimates and not based on any factual data. They are reliant on economic predictions and growth that are aggressive, unproved and extremely optimistic.

### **Proper Consideration**

The SHMA should have been the starting point to collect evidence for the housing requirements to assess realistic targets. Instead this has been used as an opportunity by the Vale to push as many houses into the plan as possible with no regard for consulting with the residents that this has an impact on. They advised that post was sent to the houses that would be affected but then by throwing in new development sites at the last minute there has been no opportunity for them to produce the reports required to justify their need. Indeed, the consultants they used advised specifically against the development of the area around "Twelve Acre Drive", for example.

### **SUMMARY**

For the reasons above I consider the plans put forward by the Vale are unsound because they have not been justified by robust evidence. I consider that lower housing numbers (about half) are actually required in the county which would then be in line with figures provided by central government.

**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.**

Improvements to infrastructure are made before the development of houses -eg four way A34 access at North Abingdon

The council listen to the advice given to them in the development report to not build on top quality agricultural land and retain the Green Belt area between Abingdon (the oldest populated town in the country) and Oxford.

There is an argument for building on land to the West of the Tilsey Park, Abingdon. Any such development will be bordered by the A34, therefore this would form a natural boundary for the housing, but I cannot see that this housing stock would be desirable to the potential buyer as this is a busy route and there would be noise issues, such as those encountered in Botley (West Oxford) where there are special walls installed to reduce the road noise for the local residents.

**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