

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Watchfield Parish Council (Dr Susan Nodder)
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<b>Files</b>	<a href="#">Hindhaugh Assocs VWHDC Local Plan - FINAL Infrastructure requirements Dec14(1).pdf</a> <a href="#">WV Hindhaugh Transport Assessment 14 May 2013.pdf</a>
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a</b>	N/A

specific site  
within a core  
policy please  
select this  
from the drop  
down list.

**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.**

**Infrastructure and public transport** - much of the housing is due in the first five years, predicated on jobs that may or may not be there and infrastructure improvements that almost certainly won't be there. The NPPF requires that plans identify and *co-ordinate* development requirements, including the provision for infrastructure. The Local Plan does not offer adequate assurance that infrastructure projects will be carried out in a timely and co-ordinated manner. Simply saying the Vale is 'preparing a new and comprehensive Infrastructure and Community Benefits Strategy' is not good enough. This should be produced, costed and scrutinised in tandem with the Local Plan and, indeed, be an integral part of it. How can the validity of the Local Plan be assessed with little information regarding detail of infrastructure improvements? Housing needs to be directly linked to job creation and infrastructure improvements should come before house building to alleviate congestion and reduce environmental impact. There is no indication of how the Vale proposes to achieve their deliverable goals with regard to infrastructure. The A420 is already over capacity without the current developments underway, let alone the predicted building along its route. The Local Plan only involves land allocation for two junction improvements with no increase in capacity. The problems of the A34 and A417 are well documented. There is no firm commitment to public transport and leaving it to market forces within private enterprise is not satisfactory. The Evaluation of Transport Impacts document implies there is capacity on the A420 for future developments. This is in complete contrast to the findings of the 'Transport Route Congestion Assessment on A419/A420/A415 Link' by Bob Hindhaugh Associates Ltd, produced on behalf of the Western Vale Villages Consortium and presented to the Vale of White Horse District Council in response to the emerging Local Plan Part 1, and now enhanced by a document suggesting Necessary Infrastructure Requirements (both documents attached). The report stresses the existing hazards, design flaws and defects along the A420 which have not been addressed in the Local Plan and suggests any increase in vehicular movements along its length will add to the problems and place all road users at risk of incident. The Local Plan does not seek contributions to mitigate the direct effects of the developments on the A420 which already acts at capacity at peak times. The lack of a localised economic development plan will inevitably lead to the majority of new residents commuting along this route. The Vale District Council is relying

on developer-led Transport Assessments as a mechanism to secure funding, rather than specify their requirements to improve this strategic link. How can the Local Plan be considered robust if this has not been decided and costed? Oxfordshire County Council is working on a transport prospectus but this is a long term project with no measurable outcomes as yet. There has been no consideration of the cumulative impact of expansion in neighbouring districts, e.g. the Eastern expansion of Swindon on the Western Vale's resources and infrastructure. Mike Murray from the Vale spoke at the stakeholders meeting to say that, 'there might well be a degradation in infrastructure', as infrastructure will follow, rather than precede the occupation of houses. The Vale states that new developments should not adversely affect existing residents. This is clearly no longer the case. The Plan, therefore, cannot be considered to be effective or sound.

**Health provision** - the Local Plan does not tie development to improvements in Healthcare provision and facilities. The District Council are too willing to 'pass the buck' to Oxfordshire County Council as *their problem* rather than address the need for increased facilities with increased housing numbers. The emphasis is too much in favour of developers in an unwillingness to reflect the true cost of development and the required increase in infrastructure. Villages on the fringes of the Vale, such as Watchfield, suffer by coming under the umbrella of Health provision from neighbouring authorities. We are consequently ignored by the Vale as a responsibility of Swindon Primary Care Trust and ignored by Swindon as residents of the Vale of White Horse. There is no evidence of cross-border co-operation to ensure such residents do not fall through the net in both authorities. The NPPF requires plans to provide accessible local services that reflect a community's needs yet there is no sound infrastructure planning for health and emergency services.

**Schools** - again, the District Council simply passes this responsibility to Oxfordshire County Council as *their problem*. Only very large scale developments have been considered in tandem with new schooling provision

with smaller 'major' developments simply incurring a *pro rata* contribution with no consideration of the cumulative effects of this vast numbers of new housing.

**Broadband** - there is no firm commitment to link technological infrastructure to development. Consistent and fast Broadband is an integral part of living and working in rural areas, yet most villages suffer from a substandard or absent service. There should be a parallel commitment to match broadband infrastructure to development within the Local Plan.

**Deliverability** ? there must be penalties set down for developers who do not complete the houses for which they have been granted permission within a short time frame. This is important as housing numbers are counted as completed dwellings rather than those for which permission has been granted. Consequently, it is very likely that the Vale will pass permission for vastly more housing than even specified in the SHMA. Merely stating that development must begin is not satisfactory and will not stop the 'landbanking' of our precious greenfield sites? The Vale's approval of housing construction, long before it is clear whether the jobs are there to be filled, is vulnerable to the consequences of a shortfall in economic growth targets. Without an independent assessment of the economic forecast relied upon by the SHMA the scale, direction and deliverability of housing is unsound.

**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.**

This version of the Local Plan still appears developer-led and, if implemented, will adversely affect existing and future residents of the Vale. We ask that these concerns are fully addressed before proceeding.

**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?** Yes - I wish to participate at the oral examination

**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.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Watchfield Parish Council, would like the opportunity to participate, directly or via a WVV representative, at the oral examination of the Local Plan and/or to present further and more detailed evidence in support of some or all of the representations set out. We also wish oral evidence, and any further written evidence which may be required of him by the inspector, to be presented by our road transport consultant Bob Hindhaugh and/or his associate Simon Boone.**