

## Comment

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**Comment by** Mr Philip Hatzis  
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**Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.** LPP2 2.45 and 2.46

**Q2 Do you consider the Local Plan is Legally Compliant?** No

**Q3 Do you consider the Local Plan is Sound?** No

**Q4 Do you consider the Local Plan complies with the Duty to Cooperate?** No

**Q5 Please provide 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 cooperate, please also use this box to set out your comments.**

### Summary

I have very specific points outlined below as to why I believe the local plan fails on so many levels. However, I just cannot understand how this development is being built in a parish where over 90% of the population submit a petition which equals just over 300 names can even be considered as a location where the houses alone dwarf the population of the current parishioners by over double. This scale is totally unjustified, disproportionate and fundamentally out of character with the village and the surrounding country side. Using the district councils own scales adding 600 properties to a "larger village" over an area which seems to be about 50% of the size of the current area and over 50% of

the 1,100 dwellings of Kingston Bagpuize sprawling across excellent arable land seems a disproportionate level of scale.

Furthermore, I am unconvinced at the level of counselling through the creation of the plan. conversations with local parishioners, and bodies from all accounts seem to be done as an afterthought to which is illegal.

General – the Plan’s approach and supporting analysis fail the test of “soundness”

- 1 Not consistent with the National Planning Policy Framework (‘NPPF’) in respect of sustainability, historic heritage or land use.
- 2 Not justified because the evidence base for the site is seriously flawed and biased, conflicts with the DC’s own policies, objectives and special hierarchy, is not needed and causes unjustifiable harm to the parish of Fyfield and Tubney.
- 3 Not positively prepared because it is not sustainable and because of the social and environmental harm done to Fyfield and Tubney.
- 4 Not effective because the development will not be financially viable if it has to support the amenities already proposed by the developers and the additional measures that would be required to mitigate environmental and amenity harm.

Traffic – (with specific reference to Paragraphs 2.45 and 2.46) - the Plan fails here the test of “soundness”

- 1 The A420 is running at capacity now, it will run at over-capacity, should the Fyfield site development go ahead.
- 2 Modelling of traffic impacts relies on an out-of-date baseline.
- 3 Traffic surveys undertaken by Fyfield residents, together with video and online (Google Maps) evidence, indicate that current traffic flow is under-estimated.
- 4 RAG analysis of traffic impact in LPP2 is out-dated and misleading.
- 5 Trip rates indicate the Fyfield site will have a severe impact on the A420.
- 6 New roundabout on A420 will encourage rat-running and the access road to the Fyfield site cannot be considered a ‘relief road’.
- 7 Proposed mitigations will have little or no impact on traffic congestion on the A420 and may exacerbate problems.
- 8 Improvements to public transport (four buses per hour instead of three) will not be enough to enable commuters to access new employment growth centres
- 9 Pollution levels in Marcham are deemed too high to build further housing. However, this development plan does not allow for the obvious direction of travel for most people who will travel towards science parks or train stations or motorways on the A415.
- 10 Traffic improvements are not sustainable
- 11 Traffic impact on the environment is inadequately researched and naively concluded

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Consultation — the Plan fails here the test of “Legal Compliance/Duty to cooperate”

- 1 Many of the detailed and informed responses to the consultation process have not been used to inform the Vale of White Horse Local Plan 2031, Part 2
- 2 The preparation of the Vale of White Horse District Council Local Plan 2031, Part 2 has not been undertaken in compliance with the Vale of White Horse District Council’s Statement of Community Involvement
- 3 The Local Plan 2031 Part 2, Detailed Policies and Additional Sites, Consultation Statement, Publication Version, October 2017 makes false representation of how the consultation responses informed the Vale of White Horse Local Plan, Part 2
- 4 The detailed responses in the Local Plan 2031 Part 2 Detailed Policies and Additional Sites Publication Version October 2017 have not been adequately considered, or used to inform the preparation of the Vale of White Horse Local Plan Part 2
- 5 The Local Plan 2031, Part 2 Detailed Policies and Additional Sites, Topic Paper 2, Site Selection, Appendix B, 2 October 2017, KBAG\_A, pages 46 and 47 makes false representation that responses to the consultation have been sufficiently addressed through the site-specific requirements, set out in Appendix A of LPP2

- 6 Community engagement has not been undertaken in compliance with the Vale of White Horse District Council's Customer Service Standards
- 7 The significance of the responses to the consultation process suggest that, had they been adequately addressed and used to inform the preparation of the Vale of White Horse Local Plan 2031, Part 2, the site in question would not be viable, sustainable or deliverable and therefore would not have been included in the plan.

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#### Other Considerations

- 1 Scale of housing in relation to nearby housing
- 2 Due diligence over historic value of location and landscape and insufficient archaeological impact assessed
- 3 Sustainability impact of housing without correct infrastructure
- 4 Destroying very good farmland inconsistent with Vale of White Horse's own sustainability targets
- 5 Other locations in the vale seem more suitable based on many of the above yet have not been given due consideration
- 6 Are the total number of houses in the vale correct based on the Government's own predictions? It seems the Vale is an anomaly in terms of the target of numbers aimed for.
- 7 Environmental impact on rare or endangered species not duly considered
- 8 Traffic flow based on whole vale and capacity of current roads not considered.

**Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.**

A clear and considered response to the points above to demonstrate that these areas have been considered legally and dutifully.

**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:**

I or my specialist representative would like to have a voice. To date, the district council has not adequately allowed people to have a voice.

**Would you like to hear from us in the future?**

. I would like to be kept informed about the progress of the Local Plan