



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 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	Stephen	
Last Name	Webb	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	Chapel House	
Line 2	Chapel Square	
Line 3	East Hendred	
Line 4	Wantage	
Post Code	OX12 8JN	
Telephone Number		
E-mail Address		

Part B

Name or Organisation :Stephen Webb

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

5. Reason for plan to be considered unsound:

The estimate of 23000 new jobs, based on the SHMA, has led to a requirement for 20560 additional homes in the Vales by 2031. To provide for this large number of homes, several sites in areas with questionable sustainability have been included in the plan.

Considering historic and current rates of growth in jobs and houses makes it appear highly unlikely that the estimated high rates of increase in jobs will be achieved by 2031.

If they are built, it is likely that large numbers of houses will be bought by people wishing to commute to Oxford or London, the exact opposite of the intention to reinforce sustainability through enabling people to live close to their place of work.

6. Modifications to make the plan sound:

Re-evaluate the number of new jobs that will be created in the Vale during the plan period, with a consequent reduction in housing requirement over the period. Rank the sites in order of priority, with each site being released as employment within Science Vale reaches a certain threshold (threshold values to be determined).

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, 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:

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Signature: [Redacted Signature]

Date: 19th December 2014

Name or Organisation :Stephen Webb

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5. Reason for plan to be considered unsound:

The NPPF, paragraph 115, places AONBs in the highest category of landscape protection. Paragraph 116 states that planning permission should be refused for major developments in these designated areas, with certain exceptions that we consider do not apply in the areas identified for development in the Plan.

Core policy 3 includes large developments on two greenfield sites in the North Wessex Downs AONB:

(1) 850 houses East of Harwell Campus. (2) Part of the 550 houses North of Harwell Campus on a greenfield site (part is on brownfield site within the Harwell Campus boundary)

Apart from the direct loss of AONB land, these developments would set a precedent that would lead to further building in the AONB, resulting in serious denigration of the local environment.

Remove all development within the AONB outside the Harwell Campus from the plan. A reduction in the numbers of houses required that would result from a re-evaluation of the housing requirement would mean that approximately 1000 houses are not required.

6. Modifications to make the plan sound:

Remove all development within the AONB outside the Harwell Campus from the plan. One option is to relocate the East of Harwell Campus and North of Harwell Campus sites wholly within the existing boundary of the Harwell Campus. Make provision for consequent need for additional employment allocations if and only if campus land becomes fully utilised. However, the loss of approximately 1000 houses can also be met by reducing the overall target for new housing (see above comment on CP4)

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5. Reason for plan to be considered unsound:

There is a presumption in favour of sustainable development within the existing built area of Market Towns, Local Service Centres and Larger Villages in accordance with Core Policy 1. Not having the characteristics of any of these three types of settlement, the Harwell Campus cannot be classified as any of them, so large developments in its proximity cannot be justified in accordance with Core Policy 4.

6. Modifications to make the plan sound:

Remove the requirement for building in the areas adjacent to the Harwell Campus. As noted in our response to Policy CP4 the loss of 1000 houses can be accommodated by a reduction in employment levels and associated housing needs.

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5. Reason for plan to be considered unsound:

The Plan justifies several development sites on their proximity to employment sites, with a consequent reduction in travel need. In particular, this is used to justify building within the AONB adjacent to the Harwell Campus. However, no evidence has been provided that the proposed housing adjacent to the Harwell Campus would be affordable to the Campus's employees. If the proportion of residents in these sites that are employed on the Campus is smaller than assumed because house prices are too high, then there is less justification for building in the AONB and the transport infrastructure proposed will be inadequate.

6. Modifications to make the plan sound:

An assessment of the affordability of housing for future employees should be carried out for each of the proposed sites.

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5. Reason for plan to be considered unsound:

The Plan specifies several development sites. Each site will only become sustainable when the associated infrastructure is built. The infrastructure will have to wait until a large proportion of the houses are built, including because the developers' CIL payments will not be in advance of house occupation. If development goes ahead on many sites at once, there will be a long period during which the residents of all of these sites will have to cope with inadequate infrastructure. If overall growth in jobs is slower than predicted, the Vale will have many areas with inadequate infrastructure for a long time (and hence not sustainable).

6. Modifications to make the plan sound:

The Plan should provide a phased growth policy over the period to accommodate the rate at which new houses are built, to achieve sustainability as fast as possible on each site. The order in which sites are developed should be based on which have the least negative effect on the environment.

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5. Reason for plan to be considered unsound:

The Housing Supply Ring-Fence includes areas of the AONB adjacent to the Harwell Campus. This reinforces the policy of building on greenfield sites in the AONB, to which we object.

6. Modifications to make the plan sound:

Remove the proposed greenfield development sites around the Harwell Campus from the Housing Supply Ring-Fence.

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5. Reason for plan to be considered unsound:

The Plan does not make provision for the future need of Network Rail to install a grade-separated junction in the vicinity of the proposed Science Bridge for increased rail services. This is important for sustainability.

6. Modifications to make the plan sound:

Increase the area of land safeguarded for the 'Science Bridge' to enable a higher road bridge and associated approach ramps to be constructed.

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5. Reason for plan to be considered unsound:

The Plan does not make provision for the use of rail services to reduce congestion and improve the sustainability of housing sites. Road infrastructure: The Plan does not make any provision for significant improvement to the main causes of existing traffic problems in the Vale. The planned growth can only exacerbate these problems. Although several improvements to junctions are included in the plan, the most significant underlying causes of delay, which include the A34 and the A417 being close to full capacity at peak times are not addressed.

6. Modifications to make the plan sound:

The Plan should include the provision of a railway station at Milton Park to reduce traffic congestion, particularly on the A34, with land safeguarded accordingly. In particular, in conjunction with a station at Grove (CP19), a Milton Park station would increase the sustainability of developments in Grove and reduce traffic on the A417. The Plan should include proposals for increasing the capacity of roads which are regularly congested due to weight of traffic. Without this the Local Plan is not sustainable, as required by the NPPF.

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5. Reason for plan to be considered unsound:

The Plan assumes that bus services will link the proposed housing sites with employment sites in order that they are both sustainable. However, bus services are operated commercially along routes that they choose, with other routes being added to fill the gaps if the council wishes and has the money to pay for them. The existing large settlement of Grove has lost all buses to both Milton Park and Harwell Campus, so it is not justified to assume that the proposed housing sites will linked to these employment sites by public transport.

6. Modifications to make the plan sound:

The Plan should include a proposal to guarantee bus services linking all proposed housing allocations with Milton Park and the Harwell Campus, whether through London-style bus reregulation, Quality Bus Contracts or another tool.

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5. Reason for plan to be considered unsound:

CP47 indicates the course of action in case delivery of houses falls behind the plan. It does not address a situation in which employment growth does not meet forecasts. In such a case, requirements for housing sites would be reduced and sites could be removed from the plan to avoid partial development and consequent reduced sustainability.

6. Modifications to make the plan sound:

Provide for a slower employment growth by defining an order of priority in which sites would be developed.

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