

SHRIVENHAM PARISH COUNCIL

The Memorial Hall
Shrivenham
Oxon
SN6 8BL

15th December 2014

Dear Sir or Madam,

Shrivenham Parish Council would like to thank you for the opportunity to respond to

1. The Local Plan 2031 Part One: Strategic Sites and Policies.

Its observations are as follows:

The housing targets set out in the Plan are inflated and unsustainable and do not constitute an objective assessment of the housing needs of the Vale.

The Plan states that 'the housing target reflects the Objectively Assessed Need for the Vale of White Horse District as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire. The SHMA sets out how many new homes are required across Oxfordshire and for each of its districts up to 2031.' We would refute this statement as the SHMA figures are largely based on hypotheses about future job creation in, and migration into, Oxfordshire which are evidence free, untested 'policy-on' assumptions which have no place in a housing needs forecast,

The Oxfordshire Strategic Economic Plan (SEP), has not been subject to public consultation or any independent scrutiny, and is therefore not an appropriate basis on which to make policy decisions.

In a recent decision letter (S62a/2014/0001) in relation to a case in Leicestershire, Inspector Jonathan King stated that a FOAN (SHMA) must be 'policy-off', rejecting a SHMA which contained estimates of potential housing need arising from LEP assumptions of jobs growth (exactly analogous to the situation here). Assumptions of jobs growth can be added by the Local Council AFTER the SHMA has been prepared.

He also noted: 'how essential it is that evidence such as SHMAs must be rigorously tested in order to establish that it is robust'. As we have shown the figures used in the SHMA (even apart from the 'policy-on' assumptions) are debatable to say the least. The figures used for the Oxfordshire SHMA have not yet been subjected to any such test which, it is submitted even at this stage, is likely to fail when realistic and credible evidence is adduced at EIP.

The recent announcement from the Communities and Local Government Committee, assessing the operation of the NPPF, calls for clearer guidance in how housing need should be assessed.

Rural communities are being forced to accept a disproportionately high number of additional dwellings in a bid to make the SHMA figures fit. The hierarchy system used does not take into consideration the strain on existing infrastructure in areas that are constrained.

Transport

Transport sustainability is a fundamental factor of any future planned development as is clearly set out in the National Planning Policy Framework. Whilst the Local Plan does make reference to the Oxfordshire Local Transport Plan there are no specific measures identified in it considering proposals for any new development.

Shrivenham Parish Council accepts that to ensure growth, economic development and stability in the area, some development in the Western Vale needs to take place. What is of major concern is the proportion of development identified and allocated in this predominantly rural area.

These potential developments are not located close to town centres. Therefore many in the surrounding residential areas will almost certainly need to travel by car (a view that is expressed in the Local Plan) and the A420 is quite clearly an extensively used commuter route.

The A420 is the principal route between Swindon and Oxford and is an important strategic link in the Oxfordshire road hierarchy. The proposed level of development within the Plan, along with development that has been granted approval will have a considerable impact on the current traffic conditions. There will be a significant increase in the levels of peak time congestion that residents currently endure as well as an additional increase in vehicle emissions. The village already experiences 'rat-running', a problem that will only be exacerbated.

The Evaluation of Transport Impacts (ETI) Study that has been prepared to inform the Vale Local Plan of the traffic issues places a greater emphasis on capacity issues on the A34 and M40 than on the A420. It makes no reference to the congestion problems caused by vehicles transferring from these routes onto the A420.

Whilst the Local Plan 2031 Part 1 has quite rightly identified some capacity issues on the A420, it is subjective and unsupported by any evidence to state it is likely to occur later in the plan period. Since the Bob Hindhaugh and Associates Transport Assessment was submitted to Oxfordshire County Council, the A420 congestion issues have been recognised and it has been agreed that a full technical route study will be carried out to identify what improvements are required as part of its LTP4 process. However, the LTP work will not commence fully until next year (2015). This impact is partly as a result of the development proposed in the sub-area and will particularly affect junctions accessing Shrivenham and Faringdon, but a greater highway capacity concern is due to the proposed Eastern Villages development in Swindon, less than a mile from Shrivenham's boundary where the cross boundary traffic flows will be significantly increased.

Whilst the Plan illustrates the safeguarding of land for highway improvements, the authority should at this stage be specifying exactly what is required so that it becomes formally adopted policy to which developers have to abide by.

Employment

Contrary to the statements within the Local Plan, Shrivenham has very limited employment opportunities.

The Defence Academy, being a military establishment, offers employment for people with specialised academic qualifications. Other roles are taken up by existing contract employees whose roles have been terminated elsewhere.

The Shrivenham Hundred Business Park consists of mainly sole traders and storage units which reduces any employment opportunities for local residents.

There is very limited scope for increasing employment in Shrivenham and as with many rural communities, the majority of our residents are forced to travel to work elsewhere.

2. The Vale of White Horse Design Guide Review

The Parish Council have no comments.

3. The Vale of White Horse Community Infrastructure Levy (CIL) – Preliminary Draft Charging Schedule

The Parish Council agrees with the proposals.

Shrivenham Parish council requests that its views are taken into consideration.

Yours faithfully,

Cllr Mrs Sarah Day
Chairman