



**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.*

Title

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

2. Agent's Details (if applicable)

Mr

John

Power

Retired

34 Hanson Road

Abingdon-on-Thames

OX14 1YL

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph **5.39,5.40, 6.82** Policy **CP13** Proposals Map

4. Do you consider the DPD is :

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

Please mark as appropriate.

5. 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.

I strongly disagree with the proposal to build on the Green Belt in North Abingdon. Technically, VWHDC may be compliant with the law. In spirit this is NOT so. VWH has plans to "release" nearly 24 sites out of the Green Belt for future development. These plans blatantly contradict the stated policy of Central Government ministers to retain and protect Green Belt land. Nick Boles (Coalition Planning Minister) has said that "unmet housing need is unlikely to outweigh harm to the Green Belt."

Brandon Lewis, Housing and Planning Minister has stated unambiguously...."This Government has put countryside protection at the heart of its reform planning. We have safeguarded national protection for Green Belt to ensure that it continues to offer a strong defence against urban sprawl. We are building the homes needed to help hardworking families and first time buyers on to the property ladder, BUT ONLY by recognising the importance of protecting the environment and our countryside, and FAVOURING brownfield sites for development. (Daily Mail letters 24/Nov/14).

Developers are driving a wagon and horses through a loophole in the egregiously flawed National Planning Policy Framework of March 2012. The NPPF contentiously ordered councils to have a "presumption" in favour of development to meet the demand for housing. Developers are exploiting this provision to secure prime Green Belt sites. This major flaw has been highlighted in the All Party Commons Communities and Local Government Committee formal review of the NPPF released on 16/Dec/14. Clive Betts, the committee's Labour chairman stated "When land for new housing is chosen, the same weight needs to be given to environmental (traffic density, air pollution, loss of agricultural and Green Land) and social factors as to the economic dimension."

(continue on a separate sheet/expand box if necessary)

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TYPE **YOUR** VIEWS HERE-

The Planning Inspector should take the egregious deficiencies of the NPPF into account and bar any building of houses or any other structures on Green Belt land. The first housing reduction from the VWHDC Local Plan should be for those 1000 houses slated for construction on the North Abingdon Greenbelt. Further reductions to the SHMA recommended quota of 20, 560 should also be seriously considered. Clear and unambiguous Central government policy on protecting the Green Belt should dominate the Planning Inspector's formal review and decisions.

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.

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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

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Yes

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

The VWHDC has not been as forthright or open in its consultation process as it should have been. My first awareness of the "consultation process" came in the form of two glossy brochures dated Nov 2014. I attended a public meeting on 03/Nov/14 which was dominated by Cllr Sandy Lovett. The VWHDC set out its plans in a lengthy and difficult multi-chaptered master document with six other related documents. It has taken me hours of effort to go through these technical papers to find the gaps and oversights.

I have paid the egregiously high price of "entry" and I am a true member of the "public".

I have also read of a fairly problematic EIP which took place in Rotherham where the "independently appointed" Government Inspector went against the formal position of government ministers and the logical position of the people of Rotherham. Hopefully the EIP for the VWHDC Local Plan will not act in a similar way. Objectivity, Central Government policy and long term thinking should dominate any decisions made on VWHDC's Local Plan.

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.

Signature:

Date:

16 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph

4.10

Policy

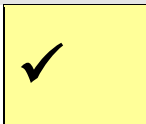
CP 4

Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes



No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

NO

4 (3) Complies with the Duty to co-operate

☐

No

No

Please mark as appropriate.

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I consider that the radical increase in the number of houses being planned for the VWHDC local plan is both excessive and highly speculative. The CPRE has highlighted that the VWHDC were planning on the construction of 13,000 houses to 2031 based on their own internal planning of 2012. Cllr Sandy Lovett confirmed that this figure was still valid but catered mainly for "organic" growth of the existing Vale population. This figure allows for gradual and managed growth. The recommendation of the Strategic Housing Market Assessment (SHMA) suggested that 20,560 was their call. This is 7,560 more than prudent forecasts allow.

Both the CPRE and the highly respected National Trust have unequivocally stated that the SHMA figures are both UNSOUND and based on highly speculative projections for 85,000 new core/skilled job growth forecast in the Oxfordshire Strategic Economic Plan (SEP). There is no evidence that VWHDC has ever challenged these very soft figures. VWHDC should have challenged these advisory figures and re-asserted the validity of their own 13,000 figure with concrete data and figures on the costs and availability of suitable brownfield land sites.

The SHMA figures are tainted with the "odeur" of short term political gain. The Conservative party is looking to protect and increase its power by manifesting itself as the champion of helping people own their own homes. Examples of this thrustline are the "Help to Buy" scheme, the recent changes to Stamp Duty and the Home Discount of 20% for First Time buyers announced today (16/Dec/14). It is significant that the formal announcement of this programme included the following statement : " The price of these homes will be kept down by using unwanted commercial land where permission for housing would not normally be given."

These programmes are being rushed into being to get an edge over the other political parties. Experience has taught the electorate that promises fade once the hard work has to start. These ambitious housing plans will "thaw and resolve themselves into a dew." once the ballots are counted. David Cameron and his Svengali (Lynton Crosby) are taking the lesson that both Margaret Thatcher

and Harold McMillan learned-Tories that help people own their own homes win elections.

The pity is that vast amounts of Green Belt land “released” will be released on the prospect that these unachievable building might be attained. The Green Belt land will thus be reassigned to existing land banks where normal planning rules will cease to apply. Factories, waste disposal plants, even retail complexes could be built on these reassigned land spaces.

The SHMA figures for houses might well not be achievable for many reasons. These include the following:

- a. The jobs to which the Oxfordshire SEP aspire may not be achieved.
- b. Essential infrastructure may not materialise for sound financial, engineering and environmental reasons.
- c. Developers face the difficult task of finding skilled workers in bricklaying, joining electrical, and HGV drivers. Building firms ceased domestic training in 2010 with the downturn and cranking apprenticeships up again will take time. As of now building firms are hiring foreign workers at premium wages and still cannot meet the shortfall in these core building trades.
- d. Builders/Developers are wont to invest in human capital. They focus on cutting down on overheads and act as prime contractors who sub-contract skilled work out to sub-contractors of varying quality. The historical skill levels in the building trades are suffering not only from long standing lack of investment by cost cutting prime contractors, but also because older highly skilled tradesmen are retiring with nobody replacing them.

(continue on a separate sheet/expand box if necessary)

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TYPE YOUR VIEWS HERE-

I would hope that the Planning Inspector takes a more holistic view as to the validity of the SHMA housing figure of 20,560. I would also hope that the very real political motivations behind the SHMA figures should be taken into account.

The VWHDC Local Plan housing numbers should be altered in the following respects:

- a. The planned building of 1000 houses on the North Abingdon Green Belt should NOT be allowed.
- b. The overall housing target (13,000) established independently by the VWHDC in 2012 should be reasserted vice the SHMA's advisory figure of 20,560.

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.

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No, I do not wish to participate at the oral examination

☐

Yes

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:

To give recognition to the effort I have made to come to grips with the difficult issues surrounding the VWHDC's local plan.

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.

Signature:

Date:

16 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph

4.2, 4.3
4.8, 4.13

Policy

CP3

Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

NO

4 (3) Complies with the Duty to co-operate



No

Please mark as appropriate.

5. 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.

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I am very concerned about existing traffic problems and consider that the new development will make things worse than they are currently during peak morning and afternoon periods.

Under the "Settlement Category" the LP suggests that Abingdon's "market town" status is more robust than it actually is with respect to supporting sustainable living in the community.

My concern is that the proposed housing sites in north Abingdon are not only in the Green Belt, but also in an area with already congested roads. The nearest employment site is at the Radley R Industrial Estate, over 3 km away from the Dunmore Road site (not 2.1 km as specified in SA Report Appendices, p123). This estate has no room for expansion. Other new employment sites for potential residents are considerably further away. Access to these is only available on already busy roads. i.e. (Culham- 5.8 km, Milton Park- 12.4 km, Harwell – 16.4 km, and Oxford – 8.9 km)

Since these new employment sites are outside Abingdon altogether, it would seem to make much more sense to build new housing south of Abingdon and much closer to these potential employment hubs.

LP Reference: CP7 Chapter 4, page 46

Provision of Supporting Infrastructure and Services

The LP states that the Developer will be required to provide for the necessary on-site and where necessary, off-site infrastructure requirements arising from their housing proposals through an appropriate financial contribution prior to, or in conjunction with their proposed new development.

These infrastructure developments must be delivered on time and demonstrate that they are fit for purpose.

My concern is based on my own experience with major contractors (qualified MSc Oxon, MCIPS and LicCIPD).

Earlier I pointed out with respect to human capital/training investment that Developer/Builder prime contractors pursue cost minimisation as a prime objective. This ethos also prevails in all of their other costing activities. The modifications to both local roads and highways to manage the greatly increased traffic and pollution will far exceed the Community Infrastructure Levy (CIL) and other sources of funding.

The funding of the required new A34 interchange at Lodgehill (North Abingdon) is to come partly from the LEP (Infrastructure Delivery Plan Appendix 1). There is no guarantee that this funding will be forthcoming.

Necessary improvements to Dunmore Road and Twelve Acre Drive are to be funded by the County Council (Infrastructure Delivery Plan Appx 1), but continuing cuts to local government funding mean that VWHDC are most unlikely to have the money for this. A further necessary expense would be the need for a pedestrian crossing on Lodge Hill. It is a difficult place for pedestrians to negotiate. A pedestrian fatality occurred here recently. Providing a necessary and safe crossing site will impede and further slow traffic flow.

LP Reference: CP 3 paras 6.68 to 6.70, pages 7 and 9.

The LP asserts that any new housing development will be accompanied by appropriate and timely infrastructure delivery, which in turn will secure effective and sustainable transport choices for both new residents and businesses.

My concern is the vulnerability to the A34 if these 1000 houses in North Abingdon are built. The A34 will require not only a diamond junction at Lodgehill (North Abingdon) but also additional lanes between the M40 and Chilton, and possibly a southern bypass and a new river crossing. These 3 major infrastructure improvements would need to be in place BEFORE any housing development is undertaken. Not to do so would open the gates to impossible traffic congestion during lane closures for route widening and regular periodic maintenance. At this time there are no plans to widen the A34. If this does occur, then it would impact adversely on the planned housing in north Abingdon and on the already traffic taxed Dunmore Road/Twelve Acre Drive network.

(continue on a separate sheet/expand box if necessary)

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TYPE **YOUR** VIEWS HERE-

My views on the traffic issues arising from the LP are contained in the previous text immediately preceding this.

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☐

No, I do not wish to participate at the oral examination

☐

Yes

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:

My reasons for this are the same as stated on my two previous representations.

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.

Signature:

Date:

16 dec 14

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

Paragraph

X.XX

Policy

N

Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate



No

Please mark as appropriate.

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This Part B does not contain a representation from Mr John Thomas Power, BComm (Hon), MIR, MSc (Oxon), MCIPS , Lic CIPD, CD.

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