

From:
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Objection to the Draft Local Plan Part One 2031

I wish to object to the Draft Local Plan Part One 2031 on the basis that it is 'unsound'. Below I outline my reasons, and what must be done, if the Vale of the White Horse and Oxfordshire is not to lose its character and identity as a mainly rural part of the country.

Re: Core Policy 4 and all other policies that flow from it, particularly Core Policies 8, 13, 15 & 20.

1. The SHMA is unsound and unsustainable and should not be relied upon. The Oxfordshire Strategic Housing Market Assessment (SHMA) has been assessed as being grossly overstated by a factor of 2 or more by a leading planning expert's review that was commissioned by CPRE Oxfordshire. Members of the public, local politicians have also considered the SHMA to over estimate the housing need.

The SHMA housing need figure is over two times what the Government's official household projections suggest which makes it highly questionable.

The SHMA makes many adjustments to official statistics that add over 20000 houses to its forecast of need for Oxfordshire.

The SHMA seems to be based on another forecast of 85000 jobs that will be created and will bring people to the county. This in turn is based on the hopes of an aggressive economic growth and house building rates. These have not been subject to public consultation or independent scrutiny.

I am not aware of any response to these criticisms of the SHMA or any independent review being instigated or considered by the council.

2. The Vale District Council hasn't given proper consideration to the environmental and social constraints in its District.

The SHMA states that it is only a starting point and a part of the evidence base to determine the need for more housing and more work is required to test if the SHMA can be sustainably accommodated as a housing target figure. As I understand it, the Vale District Council has adopted the SHMA figures without undertaking any further investigations. These figures must be first be assessed against other considerations, e.g. social, environmental and infrastructure.

Re: Core Policy 13 - Oxford Green Belt, Core Policy 8 - Spatial Strategy for Abingdon & Oxford fringe Sub Area & Core Policy 15 - Spatial Strategy for SE Vale Sub Area

1. The Vale's uncritical acceptance of the SHMA figures as targets has inappropriately allocated sites of GREEN BELT and North Wessex Downs Areas of Outstanding Natural Beauty (AONB). The Plan identifies 4 GREEN BELT developments sites for 1510 houses; and 2 AONB sites for 1400

houses. Building on sites such as these will threaten the rural character of the Vale.

A further 11 sites are proposed to be removed from the GREEN BELT. Once these have been removed I am concerned that they will be at imminent risk of development, even if they are not identified immediately as strategic sites.

GREEN BELT

The Plan is at odds with government policies on the protection of GREEN BELTS. According to the National Planning Policy Framework (NPPF) a GREEN BELT boundary may be altered only in exceptional circumstances. Recent Guidance (6 March 2014) States that :’Unmet Housing need, including Traveller Sites, is unlikely to outweigh the harm to the GREEN BELT and other harm to constitute the ‘very special circumstances’ justifying inappropriate development on a site within the GREEN BELT.

To me it seems the PLAN is riding roughshod over Government’s GREEN BELT policies to prevent urban sprawl. This Plan does not , in my opinion constitute sufficiently ‘exceptional circumstances’ to override GREEN BELT protection.

Two GREEN BELT sites in the Plan at North Abingdon are in close proximity to the A34 trunk route and building on these sites is endangering the health of the potential dwellers. A recent report by MPs has stated -

“Air pollution is an invisible killer and a public health imperative. It is unacceptable that a whole generation of people ... could have their health seriously impaired by air pollution above EU limits before government brings this public health problem under control,”

Building on these sites is a future HEALTH HAZARD that must be avoided.

AONB North Wessex Downs

The NPPF states that Planning permission for major developments should be refused in these designated areas unless exceptional circumstances can be shown to exist are that they are in the public interest.

Re: Core Policy 7 – Providing Supporting Infrastructure

1. There is a lack of appropriate infrastructure to support the Plan as it is outlined. I fail to comprehend how the road network can be improved sufficiently in the timescales to meet the increase in demand.

Any additional housing in north Abingdon will cause traffic chaos. Abingdon’s roads are already overloaded and without a continuation of the inner ring road, another river crossing or two of the Thames and a conversion to a diamond interchange at Abingdon North the Town will be gridlocked for hours each morning and evening.

I therefore believe the Plan is as it currently stands to be ineffective and unsound.

RE: Core Policy 4

1. The consultation process has been poor. The report to the Council about the consultation process ignores important procedural and policy challenges and seriously understates the public’s opposition to the proposals. I have attended several public meeting where the overriding feeling of the public has been against the Plan.

I therefore believe the Plan has not been positively prepared.

The reasons above, I consider, show the Plan to be UNSOUND because it is not justified by robust evidence.

Consequently, I request that much lower housing figures should be used by the Vale in the Local Plan, based on the Government's housing projections.

I further request that the Inspector strikes from the Local Plan all site allocations in the GREEN BELT and the AONB in North Wessex Downs.

David Launchbury