

## Comment

<b>Consultee</b>	Maggie Brown (874685)
<b>Address</b>	The Old Barn Bourton Swindon SN6 8HZ
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Maggie Brown
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<b>Consultation Point</b>	Core Policy 20: Spatial Strategy for Western Vale Sub-Area ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.3
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

**Q4 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.**

In its Evaluation of Transport Impacts Stage 2 and 3a Report, the Vale rightly identified that the proposed strategic sites are likely to lead to some impacts on the A420, particularly around Faringdon and Shrivenham.

The Plan states that development in the area is to contribute towards upgrading the A420 and land has been safeguarded at the Faringdon and Shrivenham junctions. However, improvements to junctions to allow more traffic onto an already congested road is no solution. The independent Transport Assessment by Hindhaugh Associates, funded by the WVV Consortium in 2013, demonstrated that the A420 is already at capacity at peak times of the day with queuing from Bourton to Swindon being

a regular occurrence. The local roads serving the villages in the Western Vale Sub-Area are often very rural and narrow and will be quite unable to cope with the 'rat running' that an inappropriate amount of development along the A420 will cause. The only upgrading that will 'help reduce congestion' is a full dualling of the A420 between Swindon and Kingston Bagpuize and clearly (to quote Abingdon's reason for having a disproportionate amount of housing) 'that could not be funded solely by development'.

The plan proposals are therefore simply not sustainable without a clear and unequivocal commitment, as a precondition to development, to the essential upgrading of the A420 (as well as the other main routes through the Vale - A34/A417/A338) as outlined in the document attached at Appendix 1 prepared by Hindhaugh Associates following on from their TIA produced in the Spring of 2013; and the recognition of and a plan to deter, the potential for 'rat-running' through the Vale villages with the enormous environmental damage that will result.

In recognition of the adverse impact that these various housing developments would have on the Western Vale, Swindon Borough Council, the Vale District Council, Oxfordshire County Council and the Western Vale Villages - comprising of a group of affected parishes, entered into a Statement of Common Ground in April 2014. This statement sets out the common ground between the parties with regard to the Swindon Borough Local Plan and outlines all the Councils' commitments to upgrading and improving road capacity on the A420. We are aware that until very recently no meaningful attempt has been made by any of the authorities to advance this understanding and turn it into policy.

We are aware that Oxfordshire County Council has committed to producing a Route Strategy for the A420 as part of its development of its new Local Transport Plan, but understand that this will not be finalised until the Spring of 2015. There is clearly therefore an obvious disconnect in that the urgently required modifications and improvements to the A420 will not be addressed until after the consultation on the Vale Local Plan closes. How can the housing allocations possibly be considered sustainable without an understanding of the infrastructure proposals in the Transport Plan?

It is obvious that essential improvements to the A420 should be a precondition to any housing development in the Western Vale. We therefore endorse the Western Vale Villages submission on Core Policy 7 of the Plan, which outlines modifications and improvements to the A420.

Your strategy of building 200/400/500 houses in the strategic sites in the villages in the Vale will put an enormous strain both on the highways infrastructure and on existing facilities. For example, how will the schools, doctor's surgeries and local infrastructure cope? We object to the proposal to build 500 houses in Shrivenham which at present only has just over 900 houses. This is disproportionate. Most of the new residents will be obliged to drive to places of employment as there are few local job opportunities, the nearest secondary school is in Faringdon, the doctor's surgery is already over-stretched and there are constraints to the old sewage system that serves the village. In Bourton we experience water pressure problems which will be exacerbated when the system has to cope with the extra demand of the houses in Shrivenham bearing in mind the supply for both villages comes from above Ashbury.

In 2013 the Vale identified a need for 14,300 jobs but by 2014 this has been inflated to the unrealistic figure of 22,980 new jobs. There is nothing to suggest that this is achievable and begs the question 'Why are you allocating the housing sites to support a level of economic growth which is unlikely to be realised on such a scale?'

There is no evidence in the documents published that reassure us that any of this has been assessed either locally or more widely in the Vale. It appears to be the case that you wish to add houses to those areas where you can get away with not providing the necessary infrastructure and residents will just have to make do with what is available. In reality that will be a degradation of the services and facilities for the existing population which means that the Council is falling short of its obligations in this area. This represents a serious and unacceptable departure from good planning practice, which is all the more deplorable because of existing inadequacies.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.**

### **Conclusion**

The overall strategy needs considerable readjustment. It is significantly in breach of the requirements of the NPPF. It does not protect the environment, does not build healthy and sustainable communities, does not support sustainable transport and accessibility, and does not support economic prosperity (apart for those developments adjacent to Science Vale). The Vale needs to return to a strategy more in keeping with the two previous Local Plans which concluded that locating most of the new development in the settlements of Abingdon, Botley, Faringdon, Grove and Wantage and limiting it elsewhere was the most sustainable strategy. *Focussing development in these locations, rather than spreading it more widely, would reduce the need to travel, enhance the vitality of the towns and protect the rural character of the Vale.* None of the above has changed. Indeed the Oxfordshire Structure Plan to 2016 included a requirement for the larger urban areas to be the main focus for development.

If you cannot accommodate sufficient growth in the main settlements in the Vale with far more modest growth in the larger villages, you will need to re-visit the Garden City idea (which you have effectively pushed to one side by safeguarding the land for the reservoir) for the mid to later part of the Plan period. Indeed, if you do not adjust your housing growth figures, you will be obliged to do so as this area is close to the employment at Science Vale and is one of only two viable options. The alternative, bearing in mind the Vale is taking a disproportionately higher number of houses when compared with neighbouring councils in Oxfordshire, would be to ask them to share in some of the housing growth as they will reap the benefits of the employment opportunities. South Oxon's Western border runs almost alongside the Science Vale area. It is worth mentioning that their demographic housing growth is higher than that in the Vale and they had a far worse track record in their 5 year housing land supply and yet they are being asked to provide far less housing. We share all of our services these days so surely it makes sense to share some of the planning pain in return for the economic gain. The Plan makes mention of exploring a southern bypass of Abingdon with South Oxfordshire District Council. NOW is the time to include this in the Plan in order to plan for proportionate strategic growth in the Vale's principal settlement this side of 2031 and prevent building on the Green Belt north of Abingdon which is so controversial.

The most urgent item of business however is for the VWHDC to assess the numbers in the SHMA report in regard to environmental constraints or issues related to congestion and local infrastructure which are very relevant issues in considering how much development can be sustainably accommodated and where new development should be located? (Government guidance quoted at Paragraph 4.11 on Pg 25 of the SHMA report.) Failure to do so will put you in breach of your statutory obligations. Your current draft Local Plan pays no regard to the interests of existing communities in the Vale or of its natural and historic heritage and will have disastrous consequences for the rural character of the Vale.

**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:**

As a parish we fully endorse the representation submitted by the WVV today and wish the Hindhaugh Report, attached as Appendix 1, to form part of the evidence to the EIP. Bourton Parish Council, either as a member of the WVV Consortium, or as an individual parish wishes to be represented at the Examination in Public. We also wish to be notified of submission of the Plan to the Secretary of State, any recommendation resulting from independent examination and whether the Plan is adopted.