

Comment

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| Consultee | Maggie Brown (874685) |
| Address | The Old Barn Bourton Swindon SN6 8HZ |
| Event Name | Vale of White Horse Local Plan 2031 Part One - Publication |
| Comment by | Maggie Brown |
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. 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.

Core Policy 3: Settlement Hierarchy

The Settlement Hierarchy on Page 37 is incorrect for the Western Vale Sub-Area as it shows East Challow, Shrivenham, Stanford-in-the-Vale, Uffington and Watchfield under Local Service Centre when you really mean they are Larger Villages. This is obviously a mistake. However we question a hierarchy which places Botley (as a Local Service Centre) lower down the hierarchy compared to Faringdon (a Market Town) when you compare their relative facilities, services and employment opportunities. Also the classification of ?Market Town? assumes the facilities, services and employment opportunities are similar for Abingdon, Wantage and Faringdon when, quite clearly that is not the case. You say that ?Market Towns have the greatest long-term potential for development? but that is not borne out by your housing allocations because you are unwilling to invest in the transport infrastructure

to enable Abingdon to expand whereas you are hoping to expand Faringdon without having to provide any such transport infrastructure, employment, leisure facilities etc. This is not sustainable development.

Uffington and the Smaller Villages

In our response to both the February 2013 consultation on Local Plan Part 1 and the Housing Delivery Update we questioned whether Uffington should be reclassified as a Smaller Village rather than a Larger Village because of its unique proximity to the AONB and the very rural nature of the roads serving the village. There can be few residents in, and visitors to, the Vale of White Horse who would want to see Uffington developed in the same irresponsible manner as you have now proposed for most of the other Larger Villages and we repeat our request to allow it to be classed as a Smaller Village. You certainly have not demonstrated any regard for Areas of Outstanding Natural Beauty bearing in mind your proposed allocations on actual AONB land at Harwell.

We are disappointed that you are still not willing to give any information about the 1,900 houses still to be allocated in Part 2 of the Local Plan. Although you state that 'development should be modest and proportionate in scale and primarily to meet local needs' in Smaller Villages, clearly if the Western Vale has to find room to accommodate 396 extra homes, then either our Larger Villages are going to see even further housing or the Smaller Villages are going to be allocated housing which cannot be described as 'modest and proportionate'.

Regarding your proposals for the Smaller Villages within the Vale, we refer you to our original comments in the response sent on your February 2013 consultation where we believe the detail needs to be firmed up. Our comments are even more important bearing in mind the increase in housing figures that you appear determined to adopt.

We agree with your policy for the villages not included within the settlement hierarchy categories, ie Bourton, that they are considered to form part of the open countryside where development will not be appropriate.

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.