

Comment

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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Consultation Point	Core Policy 6: Meeting Business and Employment Needs (View)
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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.

Transport and Infrastructure Constraints

The main reason for the increase in the housing figures is the highly speculative ?committed economic growth? being imposed by central government and by ambitious economics plans for employment at the Vale Science area at Harwell and Milton and in Oxford. Bearing in mind this is seen as the main new employment area in the Local Plan, why are 1650 houses being built in the rural Western Vale when it is blatantly obvious that the residents of these houses will need to travel to employment elsewhere? You are proposing this despite the requirement in NPPF Paragraph 158 that ?strategies for housing and employment in local plans should be integrated? and that the need to ?travel to work? should ?be minimised? (NPPF 4.34.)

The Plan makes no realistic attempt to provide for employment growth in the immediate Western Vale area to counter the inevitable out-commuting that will result. It seems to rely almost entirely on existing available employment land at Faringdon which has been available for over 10 years without any interest from either developers or occupiers despite various initiatives from Government and Local Bodies to stimulate development.

From a market perspective this is not surprising as Faringdon is not, and never has been, a viable commercial centre as envisaged and simply building large quantities of new housing will not change this. There is no employment expansion potential at Shrivenham and with the considerably more prime opportunities emerging only a few miles away in Swindon and to the east with the Science Vale growth initiative, it is inevitable that businesses will prefer to locate in these areas, particularly when the main arterial route serving Faringdon and Shrivenham, the A420, is so notoriously congested.

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 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.