

Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications Representation Form

Please return by 5pm on Monday 1 April 2019 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments

Part A

Are you responding as an: (please tick)

☐ Agent

☐ Business or organisation

☒ Individual

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="ANTHONY BP MOCKLER"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="LANDOWNER"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

The Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications includes a series of changes to the published Local Plan. These suggested modifications have been recommended by the Planning Inspector and are considered necessary for the plan to be found sound.

The documents below are therefore being consulted on for a period of six weeks:

- Schedule of Proposed Draft Main Modifications
- Schedule of Draft Maps and Figures
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Statement re Proposed Draft Main Modifications
- Additional Air Quality Evidence
- Additional Transport Evidence

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number / Document:

MM11

Please provide your comments below:

Can I begin by pointing out how powerless individuals feel when asked to comment on all these Local Plans, Garden Town Delivery Plans etc etc with all their complications, appendices, maps and so on and so forth? It is all very well for Council officials, Highway officials and indeed Inspectors who are paid for the job; and for professional advisors who are equally paid. But the great flaw in the system is surely that we, ordinary people, comment; our comments are ignored; no proper response is given to our arguments; and feelings of immense frustration and indeed, in my particular case, incandescent fury arise.

PREAMBLE

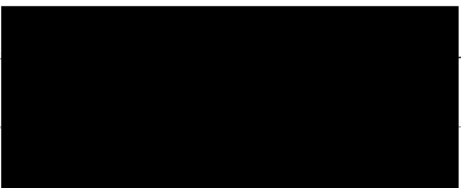
I object in principle to the very idea of "safeguarding" land; and in practice to the fact that myself as a small landowner seem to be particularly targeted having no less than three sections of land "safeguarded" over the comparatively small area of farm land of which I remain the owner. In particular the last straw is "safeguarding" the so-called cinder track which has now been added to the other two areas of my land already "safeguarded".

Fortunately I am in not quite such a weak position as the average member of the public in the sense that a large area of my land has been allocated - New Farm alias North West Valley Park - for 800 houses.

Therefore, on the principle of reciprocity, I intend to "safeguard" my own land; and in particular to "safeguard" 50 acres approximately of the 80 acres at North West Valley Park for as long as my own land as specified in MM11 is "safeguarded" by the Council.

(Continue on page 4 if necessary)

Signature:



Date:

29 March 2019

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who will act as a point of contact between the Council, Planning Inspector and respondents. This means that you will be contacted by the Programme Officer (and where necessary the Council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the Planning Inspector and Programme Officer will be kept securely and not used for any other purpose. They will retain the data up to six months after the plan has been adopted. Vale of White Horse District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website, including contact details. If you would like to know more about how we use and store your data, please visit:

www.whitehorsedc.gov.uk/dataprotection

Future contact preferences

As explained above, in line with statutory regulations, you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. Vale of White Horse and South Oxfordshire District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for Vale of White Horse ☒
- I would also like to be added to the database to receive planning policy updates for South Oxfordshire ☐

Alternative formats of this form are available on request. Please email planning.policy@whitehorsedc.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

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(Continuation 1)

In other words, to put it quite clearly, I will not submit a master plan for this part of New Farm/North West Valley Park, nor will I permit any houses to be built on it unless and until the “safeguarding” proposals as specified in MM11 and as marked on the relevant two maps included in the Schedule of Draft Maps and Figures is removed. Once these iniquitous “safeguards” have been removed I will equally remove my own “safeguard” on the 50 acres – which represents the vast field behind New Farm buildings and which should reasonably accommodate between 500 and 600 houses. To put it in good old fashioned English terms:- what is sauce for the goose is sauce for the gander.

Let me suggest that the way forward is by simple negotiation and talking things through; and by submitting, if necessary, normal planning applications – **NOT** by, in effect, issuing Ukases in the Tsarist style, handed down from on high.

It might be argued that “safeguarding” land is something that may never happen; and therefore can not reasonably be objected to. On the contrary it is a perpetual Sword of Damocles hanging over one’s head – without, apparently, even the obvious amelioration of a time limit.

MAIN ARGUMENTS

Let me now rehearse the reasoned arguments that myself and Mrs MacEwan put to the Inspector at the Examination in Public of the Local Plan part II that was held at The Beacon, Wantage on Tuesday 4th September 2018. The heading was Policy 18A: “Safeguarding Land for Improved Access to A34 near Milton Park”.

We asked that it be deleted in its entirety on the grounds that:

- a) It is not legally compliant
- b) It is not sound
- c) It does not -or rather did not - comply with the duty to co-operate.

Before elaborating on these points I would like to stress that the hearing was very rushed because the very important question of the necessity or not of an Innovation Village of 1,000 homes on AONB land at Harwell overran from the morning well into the afternoon; and the Inspector was very keen to press on with what business he could get through that day before the hall was shut at 4.30 pm. While clearly the question of the Harwell Innovation Village was terribly important (and it is most encouraging to see – pages 18-23 -that this has now been ruled out by the Inspector and the Area of Outstanding Natural Beauty thereby preserved for posterity) it does mean that our submissions had to be very rushed; and I have regretfully to say that I do not think the Inspector gave them his full attention – which of course in the circumstances is very understandable. Nonetheless it was discouraging that he would not allow me to read out a letter from Historic Houses which I now enclose as attached to this representation and which emphasises the importance of my first point:- which is this.

Point 1.

I am the fortunate owner of a Grade I listed building and the surrounding land and there are very strict Government policies protecting not just the buildings but the surrounding environment. This is emphasised in the letter from Mr Robert Parker of Historic Houses with reference to the National

(Continuation 2)

Planning Policy Framework and urging the need, therefore, for a Heritage Landscape and Visual Impact Assessment.

Point 2. Lack of any Personal Consultation in Advance.

This seemed extraordinary. We first learned of the proposal for “safeguarding” this land at a public exhibition when quite obviously, the correct thing would have been to consult the land owner involved well in advance. This seems a total failure on the Planning Department’s front; ought not to have happened; the only possible excuse being perhaps on the grounds of overwork.

Nevertheless that is no real excuse for getting plans wrong.....and planners often do get things very very wrong indeed (we need only think of the “comprehensive re-development schemes of the 60’s” that destroyed unnecessarily so many terraced streets in so many towns and cities throughout the country).

Point 3.

What in any case is the purpose of this “safeguarding” scheme? What would be the end result?

All it would mean are vastly increased traffic flows into Milton Park and almost entirely for their benefit. This would totally contradict the whole leaning and tendency of Didcot Garden Town Development Plan which is targeted towards **reducing** car transport, not **increasing** it. May I refer you to the vast document ‘The Didcot Garden Town Proposed Delivery Plan’, page 106 paragraph 5.1, page 120, page 225, page 56, page 99 paragraph 5.11, and page 102? I could add many more quotations – the whole thing is perhaps summed up by: “New Garden Cities should be designed to encourage positive behavioural change.....walking, cycling and low carbon public transport should be the most convenient and affordable modes of transport.” (p. 225)

Indeed this is vital for the whole of the Vale. Congestion, already terrible, will only become worse if the old fashioned dogma of “project and provide” which is what underlines this present “safeguarding” proposal is implemented in the 21st Century when it was already condemned as being out of date and hopelessly backward looking by transport experts (such as Professor Goodwin of ESRC Transport Studies Unit, University College, London) in the 80s and 90s of the last century.

Point 4.

Furthermore, this is totally contradictory to Core Policy 39 of Local Plan Part I and Development Policy 36 of Local Plan Part II – as well as the Foreword to Part II as specified by the then Leader of the Council and the Cabinet Minister for Planning. This, I must add, is all emphasised later on pages 31, 32 and 33 of the Schedule of Proposed Draft Main Modifications. Two quotes will suffice to emphasise this point. First (top of page 31) “HERITAGE ASSETS ARE AN IRREPLACEABLE RESOURCE, AND WILL BE CONSERVED IN A MANNER APPROPRIATE TO THEIR SIGNIFICANCE, SO THAT THEY CAN BE ENJOYED FOR THEIR CONTRIBUTION TO THE QUALITY OF LIFE OF EXISTING AND FUTURE GENERATIONS” and second (middle of page 32) “PROPOSALS WITHIN THE SETTING OF A LISTED BUILDING MUST DEMONSTRATE THAT THEY WILL.....respect, preserve or enhance the historic cartilage or contextparkland or fields and designed landscapes”.

Those who know the television series The Game of Thrones will remember a saying that characters there often come up with: “Words are Wind”. Are all these words about the protection of the historic environment and so on and so forth mere wind? If they are not, if they are sincerely meant then, “for the sake of the Old Gods and the New”, let them be acted upon!

Point 5.

The prevailing wind already comes from the A34 towards Milton Manor and The Old Brewery; and indeed further on towards Milton High Street itself. The noise from the A34 is already tremendous at most times of the day and night; and new, closer roads will unarguably make it much much worse.

An interesting point is that the Inspector told Mrs MacEwan he would come to the Manor grounds himself to listen to the impact of the noise. If indeed he did so, he neither contacted myself or Mrs MacEwan – and we would be very interested to know if he had the time and energy to fulfil this pledge.

Point 6.

In any case, this clearly contradicts Development Policy 25 (pages 101 etc) on Noise Pollution. The gist of the policy being to reduce, not to increase it!

Point 7.

These objections were and are supported by the Parish Council of Milton – the Chairman, Mrs Hoskins, was present at the The Beacon, Wantage on the relevant afternoon; though she did not speak. She and the Parish Council in general and Mrs MacEwan would no doubt support this present series of objections. But, human nature being what it is, they do not have the time nor energy, having already put their objections in writing originally, to wade through all these modifications and study the various maps and additional bundles of evidence – such as the Additional Transport Evidence of no less than 66 pages which I have glanced through myself, but which seems -unless I am much mistaken - not to be relevant to the points raised above.

Point 8.

Finally, I would like to make the point that this proposal does not protect the green spaces separating the “necklace of villages” surrounding Didcot Garden Town – a key point in the Garden Town’s Development Policy. On the contrary, it is impossible to reconcile with this vital strand to the Garden Town Project.

FINAL REMARKS

I hope these representations make it absolutely clear, first of all how disappointed we are that this “Safeguarding of Land for Improved Access to A34 for Milton Park” has not been eliminated from the Local Plan in toto.

The slight amendment made appears simply functional in the sense that the few hundred yards eliminated from the top of the scheme would have had to be built on a flood plain and therefore would have been immensely expensive and difficult, if not impossible, to implement. The main gist of the scheme has not been in any way affected

I hope it is also clear that, though the feelings of myself and my family are very very strong indeed, there are reasoned arguments as listed above for the Council – if it is the Council’s decision – to delete this particular “safeguarding” scheme; that these reasons have not been, apparently, considered – certainly not answered rationally – in the latest modifications; that it would create harmony all round were they to be deleted; and that harmony is surely a consummation devoutly to be wished!

Attached: Copy letter from Historic Houses

31st August 2018

Mr A Mockler

Dear Mr Mockler,

**Re: Letter of Support for Milton Manor, Abingdon against proposed adverse development
Vale of White Horse District Council, Local Plan Part II - Examination in Public**

We are concerned that the above proposals will have a detrimental effect to the setting of Milton Manor, Abingdon. It is an important example of a Grade I Jacobean period manor house, with early 17th C origins and Regency restoration remaining in its present form for over 200 years

Historic Houses represents the interests of 1620 of Britain's historic houses and gardens that remain in private ownership for the benefit of the nation and future generations. The cost of maintaining them thereby preserving the heritage they represent and the associated industry they sustain is huge and met by private individuals. The importance of the survival of such buildings considered to be of outstanding architectural and historic interest, together with their setting is well recognised by government. The National Planning Policy Framework Planning Policy clearly lays out government policies for the protection of historic buildings, conservation areas and other elements of the historic environment.

Historic England's advice on NPPF is as follows:

- *In 'order to make a sound decision a planning authority needs to understand from the applicant the significance of any heritage asset affected. This may require some investigative work, but the information to be supplied with the application should be proportionate to the asset's importance and the potential impact'.*
- In giving weight to designated heritage assets the planning authority should take into account:
 - i. *great weight to be given to their conservation in all decisions;*
 - ii. *clear and convincing justification for any harm to significance however slight and whether through direct physical impact or by change to the setting;*

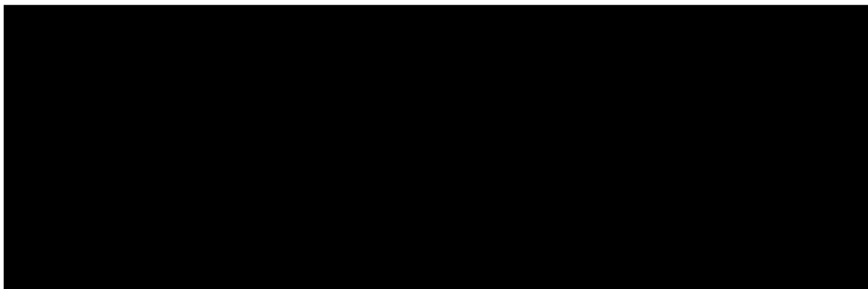
- iii. *substantial harm (direct or by change in the setting) to or total loss of Grade II listed buildings and registered parks and gardens is expected to be 'exceptional'.*

In this case factors that need to be taken into account will be the need to protect an outstanding building, the views of and approaches to it, by the proximity of unsympathetic development. We understand that there is proposal for an A34 extension or slip road close to Milton Manor, which will be severely detrimental to its historic setting that cannot be significantly mitigated by any new landscaping.

Finally government has recognised the need to protect the whole entity of an historic house, its buildings and setting. The incentive for private owners to spend substantial sums of money and effort is in the long term public and national interest, but this can often cease as a result of nearby development which materially reduces the enjoyment of occupation. In many situations, when the amenity of a house has been diminished, a point is reached when the owner is discouraged from pouring capital into its constant maintenance in the way that all such buildings require.

The Historic Houses Association, therefore, urges the Inspector to give full consideration to matters that should be contained within a Heritage Landscape and Visual Impact Assessment to determine if sufficient weight has been given to protect Milton Manor as a significant heritage asset.

Yours sincerely

A large black rectangular box redacting the signature of Robert Parker.

Robert Parker
HHA Technical Adviser