



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Philip	
Last Name	Roper	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	17 Prince Grove	
Line 2	Abingdon	
Line 3	Oxon	
Line 4		
Post Code	OX14 1XE	
Telephone Number		
E-mail Address (where relevant)		

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

See below

Policy

See below

Proposals Map

See below

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

No

4 (3) Complies with the Duty to co-operate

Yes

Yes

No

*Please mark as appropriate.*

5. 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.

**I wish to object to the draft Local Plan Part One 2031 on the basis that it is 'unsound' in a number of areas. These are individually detailed on separate sheets as Objections 1,2,3,4 below.**

6. 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 at 5 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.

**See Objections 1,2,3,4 on separate sheets as follow**

**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.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**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.

Signature:

Date:

18/12/2014

## **Vale of White Horse Local Plan 2031, Part One, Published November 2014**

### **Response to Consultation on draft Local Plan Part One 2031 (LPP1)**

#### **Objection 1 to the draft Local Plan Part One**

##### **The Estimate of Housing needs has not been challenged by VOWHDC**

**Executive Summary, Page 7:** LPP1 states “The Plan’s housing target reflects the Objectively Assessed Need for the Vale of White Horse District as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire. The SHMA sets out how many new homes are required across Oxfordshire and for each district up to 2031.”

Despite the SHMA showing significantly higher housing needs than assumed in the previous Local Plan and these higher housing needs being questioned by CPRE who had commissioned a separate consultant’s report that indicated the SHMA estimate to be significantly overstated, there is no evidence that the Vale has undertaken any sensitivity testing of its plan against lower demand scenarios. It has immediately progressed in part 1 of the plan to the use of Green Belt land for strategic housing sites. Once building work on such sites commences they are irrevocably lost and the Plan is thus inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) requires that Green Belt boundary’s only be altered in ‘exceptional circumstances’ and this level of housing need is as yet unproven.

It is therefore requested that the plan be modified so that any planned use of Green Belt land should be deferred until late in the planning timeframe in order to mitigate the risk that Green Belt land may be utilised unnecessarily.

## **Vale of White Horse Local Plan 2031, Part One, Published November 2014**

### **Response to Consultation on draft Local Plan Part One 2031 (LPP1)**

#### **Objection 2 to the draft Local Plan Part One**

##### **Green Belt usage has not been planned in a co-ordinated way with neighbouring authorities**

**Paragraph 1.11 of LPP1** The paragraph states “ The Vale of White Horse District Council is working in partnership with its neighbouring authorities under the ‘duty-to-cooperate’ and significant weight has been attached to ensuring that the Local Plan 2031 Part 1 delivers the necessary sustainable development.”

Whether VOWHDC has properly coordinated with neighbouring authorities is unknown to me. The Oxford Mail however reported (December 11 2014 Edition) that a County wide review of Oxford’s Green Belt would be launched in the new year and concluded in June 2015 and that this review had been signed up to by the City and Oxfordshire’s 4 district councils who were faced with discharging their “duty to cooperate”. The paper further reported that Oxford City Council had urged the planning inspector to reject Cherwell District Council’s Local plan as it made no allowance for the city’s unmet housing requirement.

Ideally no Green Belt land would be used at all, but if some is to be lost it would be better for this to be within a co-ordinated plan rather than piecemeal.

It is therefore requested that LPP1 approval be postponed until the 2015 co-ordinated review has been concluded, the results incorporated into LPP1 and the revision be subject to public consultation.

## **Vale of White Horse Local Plan 2031, Part One, Published November 2014**

### **Response to Consultation on draft Local Plan Part One 2031 (LPP1)**

#### **Objection 3 to the draft Local Plan Part One**

##### **Uncertainty as to where housing needs in Abingdon on Thames will be met**

**Housing Requirements Table (page 53)** The table does not adequately define where the housing needs for Abingdon will be met. There is a stated need for 5,438 houses. In addition to this need being met by known completions, commitments and LPP1 allocations a further 722 are listed as Local Plan part 2 allocations, and 563 as windfall. These last two categories are significant within the context of Abingdon and the Oxford Fringe and much higher than the proportion of such categories in other parts of the Vale. The LLP2 allocations are 72% of the 1000 total for the whole Vale and the windfall houses 62% of the 900 total for the whole Vale. These percentages are much higher than the 25% of the Vale's future housing needs to be met by Abingdon. (Vale figures sourced from the table on page 38 of LPP1).

The omission of detailed planning information on this number of properties precludes a fully informed review of the future shape of the Abingdon and Oxford Fringe area and it is requested LPP1 be modified to show where these house will go and specifically that LPP1 clarify that these additional developments will not be achieved by higher building density in the sites covered by LPP1 allocations.

**Response to Consultation on draft Local Plan Part One 2031 (LPP1)**

**Objection 4 to the draft Local Plan Part One**

**Traffic Management Proposals for Abingdon are not robust.**

Page 51 of LPP1 states “Joint working with Oxford City Council, Oxfordshire County Council, the Highways Agency and other neighbouring authorities will have identified a long-term solution to traffic management around Oxford, the A34, and in Abingdon-on-Thames and Botley.”

Although such work may be in progress there is no guarantee of its success, nor any likelihood that a solution will be delivered in a timescale consistent with housing development timetables. The planned additional housing around the Abingdon ring road will cause an increase in traffic heading for the A34 Marcham interchange as people commute South to the Science Vale Enterprise Zone, or Didcot Rail Station for trains into London (Abingdon does not have a Rail Station, nor is one planned). From my house I frequently witness peak traffic queuing along Dunmore Road beyond Boulter Drive until its intersection with the B4017, 0.9 miles away. The majority of this traffic later merges with other traffic exiting Abingdon via the A34 Marcham interchange on a section of road already subject to air quality issues.

LPP1 acknowledges these issues at page 52 as follows “5.8. The strategic development to the north of Abingdon-on-Thames will provide much needed housing in our most sustainable settlement and help to facilitate the delivery of an upgrade to the A34 junction at Lodge Hill. This not only provides access to the strategic road network but would also help to alleviate existing traffic issues within the town.”

This facilitation is by way of Section 106 funding (unspecified amount) and £9m from LEP. (Source VOWHDC Infrastructure Delivery Plan dated October 2014, page 12). This delivery plan also states “Growth arising directly from the north Abingdon sites, South Kennington and North West Radley sites requires the creation of south facing slips on the A34 at Lodge Hill. It will be necessary for the slips to be delivered early in the phasing of the development.”

It would not appear however that there is any guarantee of the LEP funding clearly essential for completion of the £13m scheme, and certainly not within the short timescale required. The Oxfordshire Local Transport Plan 2011-2030 contains the following paragraphs pertinent to this point.

14.26 There is a strong local desire to construct an all movement junction on the A34 at Lodge Hill to serve the north of the town and reduce traffic in the town centre and along the congested Marcham Road. Traffic modelling has shown that there would be limited benefits to town centre traffic levels and increased traffic levels on other parts of the road network and the Highways Agency have expressed concern about the scheme encouraging more local traffic onto this busy road. This would make it difficult to attract central government funding for the scheme. There are also local ambitions for a second River Thames crossing for the town that would remove east-west through-traffic from the town centre.

14.27 Both schemes are major infrastructure projects that would require significant financial. Given that the schemes are of local benefit, rather than strategic importance, they are unlikely to gain funding from central government. Furthermore, the level of development planned for the town would not generate sufficient developer funding to cover the very substantial costs.

I therefore request that LPP1 be modified to make approval for the North Abingdon developments conditional upon funding for the creation of South facing slips at the Lodge Hill junction being in place.