



**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

Dr

First Name

Andrew

Last Name

Turner

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

17 Loyd Close

Line 2

Abingdon

Line 3

Line 4

Post Code

OX14 1XR

Telephone Number

01235 529297

E-mail Address

(where relevant)

[andrew.d.turner@btinternet.com](mailto:andrew.d.turner@btinternet.com)

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

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

|           |                                          |        |       |               |             |
|-----------|------------------------------------------|--------|-------|---------------|-------------|
| Paragraph | 5.39-5.40,<br>5.42, 6.82,<br>6.108, 6.11 | Policy | CP 13 | Proposals Map | 3 page 7, 9 |
|-----------|------------------------------------------|--------|-------|---------------|-------------|

4. Do you consider the DPD is :

|                                                            |     |                                     |    |                          |
|------------------------------------------------------------|-----|-------------------------------------|----|--------------------------|
| 4.(1) Legally compliant                                    | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 4.(2) Sound (Positively Prepared, Effective and Justified) | Yes | <input type="checkbox"/>            | No | <b>NO</b>                |
| 4 (3) Complies with the Duty to co-operate                 |     | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

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.

The purpose of the Green Belt is to provide a buffer between towns in preventing urban sprawl, as well as a "Green Lung" in providing space for wild-life and residents exercise for both body and mind. This core policy pledges to protect this and maintain its openness and permanence. This nibbling away of the edges of such area, does neither of these.

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.

Protect existing Green Belts – giving s separation between towns/villages and providing social and wild-life amenities.

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Signature:



Date:

16<sup>th</sup> December 2014

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Paragraph  Policy  Proposals Map

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The Historic nature of Abingdon as a Market Town, would be damaged by spreading into the Green Belt to the North of the town – especially on the approach from Oxford via Hinksey Hill and Bagley Wood. The footpaths to Sunningwell and Radley would be virtually destroyed by the development.

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Do not build the houses here on Green Belt Land. The edge of the development will be on the doorstep of the top of Lodge Hill and Boars Hill – with the loss of a green barrier.

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|-----------|--------------|--------|------|---------------|-------------|
| Paragraph | 5.8, 6.45-47 | Policy | SO 7 | Proposals Map | 3 page 7, 9 |
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The difficulties of access to the town centre as well as parking have led to increased congestion and pollution. If a Park-and-ride were to be implemented at the north gateway to the town to alleviate these, space would need to be made for them – which would compete with the land allocated for the proposed development.

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Traffic problems are challenging Abingdon's viability as a Market Town. Increased housing to the north of the town further compromise this. Park-and-ride could be located to the north of the town, at the expense of the proposed development.

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The proposed development to the north/north-west of Abingdon would progressively destroy its unique character as an historic market town. Views from the north would be blighted; local footpaths overwhelmed; and local ancient woodland would be damaged.

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Don't build the houses in North Abingdon.

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|           |                           |        |       |               |             |
|-----------|---------------------------|--------|-------|---------------|-------------|
| Paragraph | 6.115,<br>6.119,<br>6.120 | Policy | CP 45 | Proposals Map | 3 page 7, 9 |
|-----------|---------------------------|--------|-------|---------------|-------------|

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|                                                            |     |                                     |    |                          |
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Loss of Green Belt habitat for wild-life (e.g Red Kites and Skylarks) as well as a countryside amenity will be lost if the development takes place to the north of Abingdon. The proposed green spaces within the development would be inadequate to compensate. Also, it is worth noting that there would be an adverse impact on the neighbouring Blake's Wood Ancient Woodland.

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|           |                           |        |    |               |             |
|-----------|---------------------------|--------|----|---------------|-------------|
| Paragraph | 6.115,<br>6.119,<br>6.120 | Policy | 46 | Proposals Map | 3 page 7, 9 |
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Rather than conserve, restore and enhance biodiversity, the development will destroy Green Belt habitat for wild-life (e.g Red Kites and Skylarks) as well as a countryside amenity for local residents. The proposed green spaces within the development would be inadequate to compensate. Also, it is worth noting that there would be an adverse impact on the neighbouring Blake's Wood Ancient Woodland and the Sugworth SSSI.

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| Paragraph | 6.115,<br>6.119,<br>6.120 | Policy | SO 10 | Proposals Map | 3 page 7, 9 |
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Increasing local traffic will increase greenhouse emissions, NO<sub>2</sub> and particulates – damaging the living environment.

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The SHMA has identified an increase in housing - 20,560 – linked to a very large increase in the number of jobs in the Vale (23,000). This is a big projection from the current situation over such a long timescale (17 years) with such certainty.

If there are fewer new jobs than predicted, there will be a reduced need for so much housing. The new job opportunities could be high tech, high investment, but produce few new jobs. Alternatively, the introduction of new technology may actually reduce the number of existing jobs thus creating an employment hole for existing residents.

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Defer the drastic irreversible use of Green Belt land to the North of Abingdon for housing development until the employment/housing needs are clearer.

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4. Do you consider the DPD is :

|                                                            |     |                                     |    |                                 |
|------------------------------------------------------------|-----|-------------------------------------|----|---------------------------------|
| 4.(1) Legally compliant                                    | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>        |
| 4.(2) Sound (Positively Prepared, Effective and Justified) | Yes | <input type="checkbox"/>            | No | <input type="text" value="NO"/> |
| 4 (3) Complies with the Duty to co-operate                 |     | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>        |

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.

The proposed number of additional houses (20,560) is subject to significant uncertainties, due to many factors. As previous estimates have been much lower, one has to challenge the assumptions on which it is based.

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

Adopting a rolling five year plan would be a more reasonable approach. The development of infrastructure (especially A34) would have a significant effect on the viability of the development in North Abingdon – accounting for 5% of the total number of proposed additional houses.

**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:

16<sup>th</sup> December 2014

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

Name or Organisation :

3. To which part of the Core Strategy does this representation relate?

|           |                      |        |  |               |                  |
|-----------|----------------------|--------|--|---------------|------------------|
| Paragraph | Vale Local Plan 2031 | Policy |  | Proposals Map | 3 page 7, 9, E14 |
|-----------|----------------------|--------|--|---------------|------------------|

4. Do you consider the DPD is :

|                                                            |     |                                     |    |                                     |
|------------------------------------------------------------|-----|-------------------------------------|----|-------------------------------------|
| 4.(1) Legally compliant                                    | Yes | <input type="checkbox"/>            | No | <input type="checkbox" value="NO"/> |
| 4.(2) Sound (Positively Prepared, Effective and Justified) | Yes | <input type="checkbox"/>            | No | <input type="checkbox" value="NO"/> |
| 4 (3) Complies with the Duty to co-operate                 |     | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |

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.

### Comments on the Consultation Process

In its Statement of Community Involvement 2009m VOWH feels that by posting information about the Local Plan 2031 on

1. its website – how many would think to look there?
2. Posters in Libraries – how many visit there these days?
3. Posters in it offices – how many visit there regularly?
4. Posters in empty shops – how many would notice these?

it is making residents sufficiently aware of the consultation process.

The first information I was aware of was at a public meeting at which Councillor Sandy Lovatt spoke, organized by the chair of the Long Furlong Community Association (who were not a body contacted by the VOWH amongst its community groups – why not?). This first meeting was well attended (>100). A follow-up meeting in early November had even more people there – which was about the time that the glossy leaflet was delivered to our houses. This gave us only six weeks to respond!

In response to this, a number of concerned residents formed a small group (North Abingdon Local Plan Group) to study the issues in more detail through investigation and analysis of the material made available on the VOWH web-site. Our first meeting was held on Monday 17th November and we were particularly concerned that the residents of Peachcroft estate were unaware of the proposed development, as the site to the north between the Oxford Road (A4183) and Peachcroft Farm had only recently been included in October 2014. Our fears were confirmed and a representative of Peachcroft later joined the group.

Following on from this, we printed 3000 leaflets and delivered these to residents on Peachcroft, Long

Furlong and some roads off Copenhagen Drive - alerting residents to the proposal and its potential implications. Many, as we suspected, were unaware of the proposal. This leaflet contained details of two 'drop in' sessions we organised on Wednesday 10th December 2pm-6pm and Saturday 13th December 10am-1pm to give general advice on the proposal and the submission forms. These were well attended and residents found them helpful. We also wrote letters to the Oxford Mail and the Abingdon Herald voicing our concerns and these were printed on 8th and 10th December respectively.

At the "drop-in" sessions, a number of residents said "I didn't know about this"; "I didn't realize Peachcroft was included"; "There is hardly any time to respond"; "There is too much to take in".

Additionally, the CPRE held a meeting on 2nd December on Green Belt sites identified in the Vale Draft Local Plan (standing room only) and a member of our group was asked to speak about our concerns about the proposal in North Abingdon.

We have written several papers concerning the proposal including papers on The SHMA, Green Belt, Traffic and Air Quality and have posted draft copies of these on the Long Furlong Community Association website. These have assessed the effectiveness of the Plan in meeting the Core Policy goals in a consistent way – and highlighted shortcomings in the logic of the proposals. This exercise was to help residents learn more about the issues and make informed choices and decide whether they want to make representations concerning the Local Plan. In addition we have posted advice as to how to fill in the submission form as it is very complicated and may put people off making representations.

We have produced these reports ourselves in a very short timescale and not employed private consultants in the hope that they contribute to the debate. As we feel strongly about the issues, we have put them in the public domain to inform residents of the proposal and to widen understanding of the issues involved. These have been sent to you by members of NALPG attached to their responses.

The VOWHDC claims it has used e-mail to contact residents (not me), articles in newspapers (what is the circulation of Oxford Mail, Herald series, South Oxfordshire Guardian) and posters (I have not noticed any). As we are all Council Tax payers – why not use this route to inform us all of the opportunity to engage in the consultation process.

Not every resident is computer savvy, so expecting everyone to get the latest information from the web-site is unrealistic. Also, the sheer number of documents and their length is overwhelming. Who has the time or the determination to plough their way through all this? The response procedure is complex and restrictive to satisfy the requirements for comments to be considered. In addition, the time made available to read, understand and respond to these is very short – especially in a busy period in the run-up to Christmas.

As a result of these factors, I do not believe that VOWH has discharged its responsibility for Public Consultation adequately.

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

The glossy leaflet sent to each householder gave the impression that the Local Plan was a "done deal". Simpler summaries of the plan and their implications were needed – being honest about areas of uncertainty and compromise. Also simpler means of response/comment were required. The use of a commercially designed web-based survey focusing residents on areas of concern by drop-down menus and allowing them to respond to the core proposals would have been a better way of collecting responses. For non-computer-literate residents, a simple paper survey would have been needed. Significantly greater time to respond at a time of year when people are not busy with preparations for Christmas would also have helped.

***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:

16<sup>th</sup> December 2014