

**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 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	David	
Last Name	Hastings	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	68 Lindsay Drive	
Line 2	Abingdon	
Line 3		
Line 4		
Post Code	OX14 2RT	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation :David Hastings

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

Paragraph	5.39, 5.40, 5.42, 6.82, 6.108, 6.111	Policy	CP 13	Proposals Map	3 page 7, 9
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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	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 Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green Belt boundary may be altered only in 'exceptional circumstances'.

Recent guidance (6th March 2014) states that: 'Unmet housing need is unlikely to ... justify inappropriate development on a site within the Green Belt.'

On 4th October 2014 an announcement by the Government Communities Secretary, the Rt Hon Eric Pickles, and the Housing and Planning Minister Brandon Lewis, confirmed that Councils must protect the Green Belt and that Ministers have underlined the Government's commitment to protect the Green Belt from development.

The fundamental aim of the Green Belt remains to prevent urban sprawl by keeping land permanently open. Boundaries of Green Belts should only be changed in "*exceptional circumstances*", and unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt.

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.

The Inspector must strike from the Local Plan all site allocations in the Green Belt.

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

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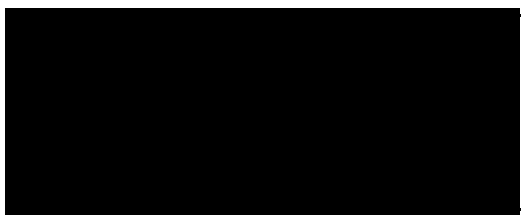
Yes, I wish to participate at the oral examination

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

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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 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation : David Hastings

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

Paragraph

6.115,
6.119,
6.120

Policy

CP45

Proposals Map

3
page
7, 9

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes



No

☐

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

Yes

☐

No

NO

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



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.

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The Plan states that 'A net loss of Green Infrastructure, including biodiversity, through development proposals will be resisted.'

However the loss of Green Belt habitat to the north and northwest of Abingdon will cause a reduction in biodiversity. One threatened species is the Skylark, which is a bird on the Red conservation list in the UK.

There would also be an adverse impact on the neighbouring Blake's Wood Ancient Woodland which directly abuts the western site on its northern edge. This was not mentioned in the Plan, and the Vale Council and their consultants have been negligent in that they failed to identify it as ancient woodland.

A more modern piece of woodland bordering Blake's Oak has been proposed to be included in the area for development. This is not indicated on the plan, but can be seen on the ground and on Google Maps.

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Removing sites from the Green Belt will result in a loss of biodiversity.

The Inspector must strike from the Local Plan all site allocations in the Green Belt.

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Signature:

[Redacted Signature]

Date:

16 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation : David Hastings

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

Paragraph

Policy

CP4

Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes

☒

No

☐

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

Yes

☐

No

NO

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

☒

No

☐

Please mark as appropriate.

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The Plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been criticised by the public, organisations and politicians. In an independent critique of the SHMA commissioned by CPRE Oxfordshire (<http://www.cpreoxon.org.uk/campaigns/item/2375-protect-rural-oxfordshire>), a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

The SHMA housing need figure is highly questionable. It suggests an increase in Oxfordshire's housing by 37%, from 272,000 to 372,060, in just 17 years, putting enormous pressure on local communities and the countryside.

Much of the SHMA's forecast is based on another forecast that 85,000 new jobs will be created in the county. However much of this figure seems to be based on questionable hopes of aggressive economic growth and housebuilding rates, and it has not been subject to public consultation or independent scrutiny.

I am not aware that there has been any response to these criticisms from the Council, or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

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The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need, and further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. As far as I understand it, the Vale Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly.

The Council should be required by the Inspector to assess the SHMA against social, environmental and infrastructure considerations, and revise the Plan accordingly.

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Signature:



Date:

16 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation : David Hastings

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

4.43
4.47

Policy

CP7

Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant

Yes



No

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

Yes

No

NO

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



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.

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Modifications to both local roads and highways to manage the increase in traffic and pollution will far exceed the Community Infrastructure Levy and other sources of funding.

The funding of the required new A34 interchange at Lodge Hill is meant to come partly from the LEP (Infrastructure Delivery Plan Appendix 1) but there is no guarantee that this will be forthcoming. Necessary improvements to Dunmore Road and Twelve Acre Drive are meant to be funded by the County Council (Infrastructure Delivery Plan Appendix 1) but continuing reductions in local government funding mean they are unlikely to have the money for this.

I cannot see how public services and infrastructure, which are already over-stretched in many places, can possibly be improved within the required timescale to meet such a great increase in demand.

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16 Dec 2014

Part B – Please use a separate sheet for each representation

Name or Organisation : David Hastings

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

Paragraph	5.8, 6.45 –47, 6.55, 6.57, 6.71, 6.73, 6.78, 6.79, 6.105	Policy	CP33	Proposals Map	
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Placing housing to the north and north-west of Abingdon when the main employment opportunities are expected to be south of the town will place additional stresses on the road network. The distances are such that walking and cycling are not really an option, and public transport does not serve these routes.

It is already the case that the A34 becomes severely congested at peak times, and also at other times if there is an road traffic incident (which are becoming increasingly frequent). The lack of alternative routes exacerbates this. Recent (December 2014) announcements about A34 'improvements' will not help this situation.

The proposal does not in any way help with access to Oxford. It already takes an hour to travel the 6 miles from north Abingdon to the centre of Oxford at peak times, and the large number of additional vehicles on the A34 from the new developments will increase this significantly.

(continue on a separate sheet/expand box if necessary)

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Mitigation measures of a full diamond junction at Lodge Hill, widening of the A34 and an additional river crossing to the south of Abingdon will require substantial investment well beyond the scope of CIL (Community Infrastructure Levy). This is unlikely to be forthcoming in the present regime of cuts in local government funding.

It would be more sensible to locate the additional housing required by jobs growth nearer the employment sites, especially as it is a goal of the Plan to encourage the use of more sustainable means of commuting (walking, cycling and public transport) which is clearly impractical if the housing is located to the north of Abingdon.

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16 Dec 2014

