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Date: 15/12/2014 21:53
Subject: Vale Local Plan Response to Consultation on Local Plan Part One 2031

Name Mr Neil Alistoun Address 26 Alexander Close, Abingdon, Oxon, OX14 1XA

Objection to the draft Local Plan Part One 2031 I wish to object to the draft Local Plan Part One 2031 on the basis that it is 'unsound'. Below I outline my reasons, and what must be done, if the Vale of the White Horse, and indeed Oxfordshire as a whole, is not to lose its character and identity.

Re: Core Policy 4 & all others that flow from it, in particular, Core Policies 8, 13, 15 & 20: 1. The SHMA is unsound and unsustainable and should not be relied upon. The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, local organisations and politicians alike. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by 250%. From these criticisms I understand that: - The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable; - The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and - Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just 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. However, I am not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

There is a general feeling that the SHMA may have been grossly overestimated, as well as the amount of applications to remove greenbelt land throughout the county, in order that even if the local council plans are rejected in over half the sites they will have still secured sufficient areas for their housing needs.

I further believe the government should be doing more to introduce growth and stimulus into areas where job growth is required rather than encouraging people from around the country to come and live in our county.

I am also concerned and extremely critical of the timing (and limited time to response) of this public consultation, including the sheer amount of documentation issued, with the consultation coming in the busiest time of the year before Christmas, as well as during the period when the majority of commuters have suffered misery at the hands of local councillors decision to undertake traffic improvement works on multiple sites at the same time as this consultation, when the majority of the working population (my wife and I included) have found their free time being reduced by over an hour a day due to increased congestion within the Vale and around Oxford City. How I have found time to complete this email as well as research how to respond to this plan, is a mystery to me. 2. The Vale District Council has failed to give proper

consideration to the environmental and social constraints within the District: The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that 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, the Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations. I further believe that the local council is not working in the best interests of the local population and has wasted valuable taxpayers money on the SHMA.

Re: Core Policy 13 Oxford Green Belt, Core Policy 8 – Spatial Strategy for Abingdon & Oxford fringe Sub Area & Core Policy 15 – Spatial Strategy for SE Vale Sub Area: 3. The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale. A further 11 sites are proposed for removal from the Green Belt. I am concerned that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

I am particularly concerned over the plans to build 800 houses north of the Abingdon ring road for the following reasons. Abingdon is already an extremely over populated and under resourced town which has suffered from past decisions to continue expanding it outwards from its very small and under resourced town centre. We live on the outskirts of Abingdon and it can sometimes take twenty minutes to get into the town centre because of congestion and the lack of free flowing traffic due to the inadequate traffic design of this ancient town centre. I strongly urge you, as the individual who signs off on these plans, to come and visit Oxfordshire in rush hour to experience the congestion for yourself, before passing any plans for further sites for development. I believe although this is not part of the remit of this consultation, in which we have to specify why the plan is unsound, that the Council has continued to underestimate the impact of traffic within the county, and will continue to do so. I believe that the limited road improvement plans which could be made in order to accommodate another 3,000-5,000 cars on the road in the greater Abingdon area alone, in which a south bound slip road to access the A34 from Lodge Hill has been mentioned, as well as roundabouts being put on Dunmore Road and the remainder of the Abingdon ring road, will do little to reduce the increased congestion from site traffic as well as the additional households once the houses have been built on the sites identified in North Abingdon, Kennington and Radley.

I have lived in Oxfordshire for over 15 years now and have already seen and felt the impact of the increased house building within the area. Speed limits have been reduced across the county to accommodate the additional traffic on the road, and even then, traffic can not flow at the speed it is intended to because there are too many cars on the road (which have increased in the last decade), and insufficient measures have been put in place to ensure this has not happened. The A34 has needed 3 lanes going northbound for over five years now although there is insufficient space for this to ever happen. The A34 always flowed freely in the morning ten years ago and for the past two years queues and tailbacks stretching well over 5 miles have been a regular occurrence both north and south bound of Oxford. I believe the government should be focussing more resources to build improved road and other traffic links (trams etc) than focussing on house building as the solution to having insufficient money. A link road joining the A34 from the South to the A40 east of Oxford is required more than ever to reduce the amount of national traffic that passes its way past Oxford on a daily basis.

I have also seen the green belt between Wantage and Grove be consumed by housing developers, having grown up in the area in the late 1990s, with a resultant conurbation and absolutely no distinction existing between these two sprawling "towns". I have been told that Grove had the unusual distinction as being the largest village in the northern hemisphere at one point. I wonder how this was ever allowed to happen, given that exceptional circumstances were necessary in order to remove greenbelt, and deeply fear that Abingdon and surrounding villages will merge into one another in the future, with houses as far as the eye can see, and nowhere for future generation to go for a walk in the country.

I would also like local councils to be held more responsible for pollution levels (as I understand it fines do not prevent or discourage councils from their plans to build more houses, increase the carbon footprint of the county/area, and reduce the amount of traffic as well as congestion on the roads). Key performance indicators should be introduced including CO2/NO2 emissions, average mpg figures as well as average speeds for daily commutes, and targets put in place for local councils to meet, to ensure our county remains an attractive and healthy place to live in for future generations. More money should also be put into developing cycle paths throughout the county to give commuters a viable alternative. Green Belt 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'. Moreover, recent guidance (6 March 2014) states that: 'Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.' The SHMA does not provide any clear reason as to why these green belt provisions and restrictions need to be removed; the local Government is just attempting to make it easier for themselves in the future to build houses as local speculative developers feel the need to generate absurd amounts of profit (50% margins can easily be achieved on modern housing sites with over 100 houses, and little in the way of contributing to the local infrastructure are ever demanded by local councils*), without a genuine need being present. Given the timescale (over 15 years in the future) and sheer amount of houses (growth which the county has never experienced in the past) being called for, there is even more uncertainty as to whether these numbers will ever materialise. Anyone who has experience in business will realise it is extremely foolhardy to try and predict what is going to happen within a 3-5 year timescale, never mind a 16 year timescale!

* The local government has pledged to ask developers for a contribution of £4m for a slip road costing £13m, allowing southbound access to the A34 at Lodge Hill, presumably from sites which will encompass over 2,000 homes. At an average profit margin of £100,000 per home built, at least £100million should be made available for improvement works. Both landowners and developers should be forced to co-operate in ensuring that real improvements are made to the county before any planning permission is granted, not meagre contributions which amount to £2,000 per house built.

The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim 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.

North Wessex Downs AONB Under the Countryside and Rights of Way Act 2000 the Council has a statutory duty to have regard for the purposes for which the North Wessex Downs were designated an AONB, that is to conserve and enhance the natural beauty of the landscape. The NPPF places AONBs in the highest category of landscape protection and affords them "great weight" in the decision-making process. Further to this the NPPF confirms that AONBs are one location where restrictions apply to development and accordingly that: 'Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.' Re: Core Policy 7 – Providing Supporting Infrastructure: 4.

There is a lack of appropriate infrastructure to support the Plan as outlined. I cannot see how public services and infrastructure, such as the road network, which are already over-stretched in many places can possibly be improved within the timescales to meet such a great increase in demand. I do not believe that the District will be able to cope with this level of growth and I am very concerned about the impact it will have on the environment and the countryside. I therefore believe the Plan as it currently stands to be ineffective and unsound.

In addition, I urge you to visit Abingdon to understand the function of the ring road - it is supposed to be a fast moving commuter route for house owners to access the A34 or leave Abingdon from, as well as serving the purpose of the boundary of the town, and the beginning of the green belt. The local council wishes to remove this by removing green belt regulations followed by:

reducing the speed limit from 40 to 30 introducing roundabouts for all roads in order to access the ring road further alienating the town centre of Abingdon from its occupants and putting even more pressure on the town centre by increasing the population even further (how is Abingdon town centre going to cope with even more traffic on the roads?). People already shop in Oxford, Reading or Didcot because of the traffic around the centre of the town, the lack of shop choice in Abingdon (shops close because no one wants to shop there because it is so inconvenient to get to) even though these are significantly further away. My point is - Abingdon can not cope with anymore traffic, either from plans to build in Abingdon, Kennington or Radley - it will just mean more misery for local commuters. As soon as a traffic incident or roadworks occurs in Oxfordshire, the traffic grinds to a halt as it can't deal with the additional flow of traffic coming through a small historic town or village centre. Adding any more cars to the roads will be a huge mistake, please visit the county and see this for yourself, as well as access traffic surveys undertaken over the last fifteen years to understand the impact the additional developments have already had on our roads. I strongly urge you to undertake independent research on average car journey times during rush hour in the Vale to understand how plans to build more houses in the area will affect commuters bringing in essential tax revenues for local government to improve the local area. Please also note there are numerous traffic "pinch points" throughout the county; Clifton Hampden traffic lights, the toll bridge near Farmoor, the A40 east and west bound approaching Oxford, the list goes on and on. We can simply not cope with anymore traffic on our roads!

Re: Core Policy 4: 5. The consultation process has been extremely poor. The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and at the public meetings convened to discuss the plan. I therefore believe the Plan has not been positively prepared.

Please also see my comments above over the timing of the plan, which is very cynical in the general public's opinion. For the above reasons, I consider the Plan to be unsound because it is not justified by robust evidence, and request that the Inspector strikes from the Local Plan all site allocations in the Green Belt and North Wessex Downs.

I thank you for taking the time to read my email and hope my comments will make you understand how populated the Vale of The White Horse is already, and what an adverse effect building more houses in an already developed area will have, especially when considering the available options to improve the transport network around Abingdon and Oxford.

Yours sincerely
Mr N. Alistoun