

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Mark"/>	<input type="text"/>
Last Name	<input type="text" value="Baker"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (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"/>
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Email Address	<input type="text"/>	<input type="text"/>

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph

Policy

Policy 4a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Having assisted with the preparation of Fyfield and Tubney Parish Council's objection to the inclusion of site KBAG_ A ('the Fyfield site') in the additional allocations in Policy 4a, I fully endorse the points made in that objection.

The concepts underlying the criterion of **positive planning** are opaque to the layman (as is much of the jargon in the prolific verbiage underlying the plan). However an allocation based on the airbrushing of Fyfield and Tubney (the community most adversely affected by the proposal) from the discussion of the site, the resulting failure to consider the damaging impacts of the proposal on the villages and their conservation areas, the biased and distorted 'evidence base' and the insultingly inadequate process of consultation of the Parish Council represents the opposite of any concept of positivity.

Moreover development of the Fyfield site flies in the face of **national planning policy** as set out in the NPPF with its emphasis on **sustainability**. There is nothing sustainable about building a car-dependent, urban commuter dormitory, without coherent links to the communities on either side of it or a strong central core of its own, on good farm land in open countryside in an important landscape feature of the Vale. There is nothing sustainable about a housing estate remote from accessible jobs sending several hundred extra cars out in peak times onto an already over-congested main road. And there is nothing sustainable about proposing to bring the noise, light and traffic pollution of a new roundabout to within a few hundred yards of Fyfield and its conservation area without even suggesting what mitigation measures will be needed. In short, there is nothing sustainable about building the wrong houses in the wrong place – which is what this development offers.

Incidentally, there was nothing sustainable (in a rather different sense) about the earlier pretence that the Fyfield site would make a substantial contribution to meeting Oxford's alleged needs, so it has been quietly dropped from the list of sites close to and accessible to Oxford, leaving the District Council ('DC') in a complete muddle about what purpose they think the development would serve. See my separate comment on Paras 2.8, 2.16 and 2.37.

The allocation fails the test of **justification**. The DC had clearly identified the site as a preferred, rather than a possible, option long before it came to the attention of the community affected by it. As a result the 'evidence base' is demonstrably biased and flawed. The PC's objection provides an analysis of two parts of the evidence base to show the flaws and bias in them; and a separate study calls into question the accuracy of the traffic studies. With more time and resource, other examples could have been given. The overwhelming impression of the evidence base is that the district council's staff has worked with their advisors to show that the Fyfield site is a front runner, rather than to establish whether it should be a candidate. Moreover, recent proposals for changes in planning methodology suggest that the purported justification for including the site – the quantum of housing needed according to the strategic housing market assessment – is open to challenge.

There are also important doubts about **effectiveness**. The PC's objection demonstrates the economic non-viability of the site – even before taking into account the expenditure, hitherto ignored, that will be needed to mitigate the harm to Fyfield and its conservation area. That is vindicated by the recent indication by the developer in their scoping analysis that they are likely to seek approval for even more houses than previously proposed.

As a separate issue under effectiveness, I believe that monitoring concerned only to make sure that houses keep up with forecast economic growth, without a braking mechanism if the growth does not materialise, represents a real threat of blighting the rural Vale with half completed building sites constituting grim eyesores for years to come.

The inclusion of the Fyfield site in the allocations for housing in the Local Plan part 2 is indefensible under every criterion of soundness set out in NPPF.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

Remove the Fyfield site from the Additional Allocations in Policy 4a (and Policy 8a)

(Continue on page 4 /expand box if necessary)

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.

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

☐

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:

To reinforce the points above orally, and to support the PC in its representations.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

12.11.2017

Sharing your personal details

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Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒

I would like to be added to the database to receive general planning updates

☐

Please do not contact me again

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Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph

Policy

47a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

This policy is obviously, absurdly and dangerously skewed. Its wording gives no thought to the possibility that the very optimistic business growth forecasts on which the Plan is based may not be achieved. The danger that an economic downturn could cause a dramatic slowdown in sales, forcing developers to stop construction projects before completion, should not need to be spelled out. I am appalled at the prospect of the final irony: the building of 600 inappropriate houses or more on the Fyfield site followed by an economic collapse. There would be a shambles of ghost houses in various stages of completion – a planning disaster on the scale of sites left derelict in Spain. **The skewed approach to monitoring implementation of the plan fails the test of effectiveness and is unsound.**

(Continue on page 4 /expand box if necessary)

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Reword policy to allow for a slowing down of housing consents if economic or other circumstances make that appropriate.

(Continue on page 4 /expand box if necessary)

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

☐

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:

To make my points to the Inspector in person.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

12.11.2017

Sharing your personal details

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Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒

I would like to be added to the database to receive general planning updates

☐

Please do not contact me again

☐

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Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph

2.7

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

n/a

No

n/a

4. (2) Sound

Yes

No

✓

4. (3) Complies with the Duty to Cooperate

Yes

n/a

No

n/a

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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The justification for the requirement of **at least 22760 homes has been undermined by new developments**. CLG's recent consultation paper '*Planning for the right homes in the right places: consultation proposals*' criticises the SHMA methodology as over-complex and lacking in consistency and transparency and suggests an annual requirement for the Vale of 689 new homes over the next ten years, against the 'current local assessment' (presumably based on LPP1) of 1028 a year as well as a massively reduced requirement for Oxford City from 1200-1600 a year to 746 a year, reducing the Vale's share of Oxford's unmet need to trivial numbers. The Vale's annual housing requirement would be **halved if these figures were applied, and the already tenuous arguments for including site KBAG_A ('the Fyfield site) in the additional allocations would disappear**.

The imminent introduction of a new methodology calls the soundness of the existing one into increasing question. The Fyfield site should not become a monument to an over-ambitious estimate of future housing needs at the expense of good farming land in a valued rural landscape. The Inspector should give the DC a year's grace to apply the revised approach and, with proper consultation of the communities affected, rework the business growth guesstimates on which the SHMA was based.

(Continue on page 4 /expand box if necessary)

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The Plan should acknowledge the likelihood that the housing needs have been overstated, apply a moratorium, and rework the housing requirement in accordance with the new methodology when it is introduced, deleting the Fyfield site from the additional allocations.

(Continue on page 4 /expand box if necessary)

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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, 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:

To argue in person the case for regarding figures based on the present estimate of housing need as unjustified and unsound

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

12.11.17

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Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph 2.8 (and 2.16 and 2.37)

Policy

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Paragraphs 2.8, 2.16 and 2.37 (to be inserted as a comment on each of them)

The DC have got themselves into an inglorious muddle in paragraphs 2.8, 2.16 and 2.37 which shows that the **inclusion of the Fyfield site**(HELAS ref KBAG_A) **in the LPP2 allocations is not justifiable and unsound.**

Paragraph 2.8 says that LPP2 provides additional housing sites to address Oxford's unmet needs (the only other identified reason is related to Didcot). That might lead the reader to infer s (contrary to the Oxford Growth Board's view) that Fyfield is fit for that purpose. But **Table 2.1 does not include the Fyfield site among those that are close to and accessible to Oxford.** That clearly indicates that the **DC now does not regard the Fyfield site as making a useful contribution to Oxford's unmet need** (correctly, given its distance from Oxford and the congestion on the A420). But paragraph 2.37 asserts that the extra housing in LPP2 comprises (ie consists only of) extra starts and commitments, additional housing for Oxford's unmet need and additional housing in the South East. The DC needs to make its mind up.

But the truth is that Fyfield site **is just a convenient scapegoat, which was identified as an easy option, the first village on the A420 outside the Green Belt, long before the flawed and biased site selection and consideration of 'reasonable' alternatives. It is a makeweight with as little practical use as Polyfilla in a badly constructed building. It is only there to fill a gap in the numbers, and adds nothing in structural soundness to the Plan**

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5

above. (NB Please note that any non-compliance with the duty to cooperate 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.

In the absence of a proper rationale for the inclusion of the Fyfield site it should be removed from the allocations

(Continue on page 4 /expand box if necessary)

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

☐

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:

To urge the Inspector face to face to explore the lack of logic in the allocation of the Fyfield site for housing

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

12.11.2017

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Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph 2.45 and 2.46

P

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Paragraphs 2.45 and 2.46 are **unjustified** because their references to site KBAG_A ('the Fyfield site') are faulty:

1. The site is in open countryside in Fyfield not Kingston Bagpuize and para 2.45 should be addressing the implications of the development for Fyfield
2. The description of KBS as a sustainable village has been invalidated by its enforced doubling of size in the last 5 years without any improvement in the infrastructure: it is becoming a ribbon-developed, car-dependent, dormitory conurbation for commuters.
3. Paragraph 2.46 is **vacuous planner-speak, with no relevance to the Fyfield site**. However much the frequency of bus services is improved, the absence of jobs within reasonable reach by public transport is tiny (as shown in the Oxfordshire Growth Board review in 2016) and the vast majority of workers living in the proposed new houses will be dependent on cars to get to work. The A420 is already seriously over capacity at peak hours (as shown in the Fyfield and Tubney representations) and the development will harm the quality of life of existing users of the road as well as that of the residents of Fyfield and Tubney.

The lack of justification for the way the paragraphs are written makes them **unsound** as a basis for allocating the Fyfield site for development.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

1. Acknowledge the damage done to the sustainability of KBS by the overdevelopment to date
2. Recognise the location of the site as Fyfield not KBS and discuss the damage to the Fyfield and Tubney community in noise, light and environmental pollution and reduced quality of life
3. Drop the absurd and misleading enthusiasm for improved public transport in a context where it will serve only a minority of the residents of the proposed development, and recognise that the development will add several hundred cars at peak hours to already over capacity roads without any prospect of mitigation
4. Drop the Fyfield site from the list of allocations

(Continue on page 4 /expand box if necessary)

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?

yes

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:

To support my assertions orally in front of the Inspector

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

13.11.17

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒

I would like to be added to the database to receive general planning updates

☐

Please do not contact me again

☐

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

I cannot sign documents electronically. However I confirm that these are my views on paragraphs 2.45 and 2.46, that they should be recorded as such and that I wish to support them by appearing personally at the Inquiry. I similarly confirm that comments in my name on other paragraphs and policies should be formally recorded as my views

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

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

Local Plan 2031 Part 2

Publication Version Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	Mark	
Last Name	Baker	
Job Title (where relevant)		
Organisation representing (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Mark Baker

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

Paragraph 3.217etc

Policy NONE!

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Paragraphs 3.217 to 3.221

The Local Plan annuls its predecessor's Saved Policy NE7 (among many others of value in protecting the Vale's natural and historic legacy). That is highly regrettable as is the complete absence of any Development Policies dealing with Landscape Character. Without them LPP1 Core Policy 44 is no more than a pious expression of virtuous principle – notably not put into effect in the allocation of the Fyfield site for housing.

By proscribing development that would harm the character of the Corallian Ridge would not be permitted except where there was an overriding need, Policy NE7 protected an important feature of the landscape. Without it Fyfield and Tubney, and (did they but know it) other communities along the Corallian Ridge, have become vulnerable to inappropriate developments (such as the current proposal to build 600 or more houses on good agricultural Fyfield land in open countryside in the Corallian Ridge). **The disappearance of the Saved Policy (and of others with similar protective value) is very harmful to the natural legacy of the Vale. Taken with the absence of any Development Policies dealing with Landscape Character, these paragraphs fail the tests of positive planning and justification and are unsound.**

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Restore Saved Policy NE7 from the Local Plan 2011, and others with similarly protective effect, and insert a Development Policy that gives teeth to the intention to protect the Vale's outstanding natural features.

(Continue on page 4 /expand box if necessary)

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

☐

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:

To make my points to the Inspector in person.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Mark Baker

Date:

12.11.2017

Sharing your personal details

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