

VALE OF WHITE HORSE LOCAL PLAN 2031

(Part 1 Strategic Sites and Policies) EXAMINATION

INTRODUCTION

Sunningwell Parishioners Against Damage to the Environment (SPADE) is an established campaigning group, which for over a decade, has responded to strategic planning processes, at local, district, and county level, with, and on behalf of the residents of Sunningwell Parish. We work closely with the Sunningwell Parish Council which endorses the points we make in this submission. We believe in the permanence of the Green Belt. We accept the need for housing developments and infrastructure but believe that brown field sites should be used before green field and certainly before long established and valued Green Belt. We believe that local people should have a true voice in establishing planning policy and welcome the opportunity to contribute to the scrutiny of the Vale's Local Plan.

- SPADE has a fundamental objection to the 2-stage structure of the EIP as it fails to address limiting factors to the adoption of the Objectively Assessed Need (OAN) and the SHMA figures which is contrary to the National Planning Policy Framework (NPPF)
- The Council's Sustainability Assessment (SA), commissioned to underpin the Vale Local Plan (LP) fails to take proper account of the footnote to para. 14 of the NPPF. The SA asserts in paragraph 11.8.6 that the housing target was adopted because it meets the 'objectively assessed housing need in full, in accordance with national policy' without acknowledging the potential restrictions to that policy cited above. It fails to consider whether the Council should initially have tested the SHMA number against those restrictions, and only then applied the policy and criteria for excluding environmentally sensitive areas with rigor. The sustainability assessment therefore wrongly accepts the inroads into the Green Belt, AONB, the setting of Listed Buildings etc. as being sanctioned by the NPPF, when the opposite is the case
- We believe the SHMA numbers on which the housing requirement is based, are grossly overstated. The justification for developing substantial tracts of Green Belt in the Vale, given in the SA, appears to be that the Vale, faced with the numbers required by the SHMA contends that it has exhausted all alternatives and that it therefore meets the "very special circumstances" test in the NPPF. However, this approach is fundamentally flawed as the NPPF clearly states "unmet housing need... is unlikely to outweigh the harm to the green belt and other harm to constitute the very special circumstances justifying inappropriate development in the green belt." This lack of challenge of the SHMA has led to the Vale taking the easy option in order to build quickly, which can be more easily achieved on greenfield sites, rather than adopting the brownfield/previously developed land options first
- This situation is further compounded by the apparent fact that, as the Vale considers "exceptional circumstances" exist to justify the alterations to the Green Belt and AONB, the Inspector has requested a paper, to be received by 21st August, to clarify what in each case the Council considers the exceptional circumstances are
- The date given for receipt of the Vale response precludes participants in the EIP from assessing the contents of the Vale's "exceptional circumstances" justification in Stage 1 of the EIP at which time the SHLA / OAN will be examined. Delay in the availability of the Vale justification, coupled with the intended later assessment of its contents and green belt and AONB matters is considered unsound and prejudicial to the outcome
- SPADE contends that the result of the failure of process above, coupled with the intended structure of the EIP, where Core Policy 13 covering green belt is relegated to Stage 2, after the spatial strategy and strategic site selections are already approved by the Inspector, makes the EIP inadequate
- SPADE believes that Stage 1 of the EIP must cover not just Core Policy 13 but all aspects of

- Vale policy that have a direct bearing on the apparent blind acceptance of the SHMA figures
- In addition we understand that the Vale has failed to fully comply with the SEA regulations 2004 in that it failed to submit the SHMA to an adequate strategic environmental assessment and sustainability appraisal

Matter 3 – Spatial Strategy and Housing Supply RingFence

3.1 Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based? In particular:

(a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3) and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?

- SPADE supports the Settlement hierarchy outlined in Core Policy 3 but suggests that the Vale’s approach generally does not comply with specific aspects of NPPF Para 17 which requires it to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.” The approach taken results in an increased and unnecessary focus on green belt, AONB and greenfield sites
- In addition housing allocations in the Green Belt fail to take into account NPPF Para 17 in that they fail to “protect the green belt” surrounding our main urban areas without due recognition as to the intended permanence of GB

3.3 Is it feasible that a significantly different distribution of housing development from that proposed could be delivered?

- SPADE contends that if the OAN were adjusted (as a result of acceptance of the protections offered by way of the footnote to NPPF Para 14) then as a result of lower numbers and strategic site removal from green belt and AONB locations, a significantly different distribution of housing development could be delivered
- It is understood that alternative proposals promoted by third parties in the area of Sunningwell Parish have already been assessed and discarded¹. This inappropriate GB location, development of which would disregard all green belt requirements as set out in the NPPF, could be promoted again, potentially to seek to address Oxford’s unmet housing need, on the basis of its potential sustainable transport due to the recently announced OCC LTP remote Park and Ride Strategy. However, this policy is as yet unproven and subject to an ongoing viability study by the OCC. SPADE contends that such a proposal would be wholly inappropriate as this would be an isolated site, effectively cut off from the facilities of Abingdon Town by the A34, and would conflict with at least 4 of the 5 purposes of Green Belt designation.

¹ (as outlined in Appendix A P24 of the Topic Paper 3 “Strategic Sites Selection” dated November 2014)