

From: localplan
To: planning.policy@whitehorsedc.gov.uk
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Subject: Fwd: local plan comments

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>>> "Ball, Caroline (Group Tax [REDACTED])" 17/12/2014 20:35 >>>

I do not consider that the updated local plan has been made sufficiently accessible for review and comment. Coming out in the run up to Christmas and spread over a number of hard to down load large documents does not make the proposals easy to assimilate or access and thus commenting is not sufficiently accessible to all. It is also quite surprising that a document about how to comment on the proposals is considered necessary.

The updated local plan itself is not sustainable and not in the best interests of a rural community, the preserving of which should be of upmost priority for the Vale, this ought to be a policy adopted by the Vale. The concerns raised by many respondents about excessive housing, insufficient support that there will be the number of jobs brought into the Vale to support and substantiate the need for such a level of development and basic infrastructure concerns have not been adequately addressed. The plan requires a much more critical and realistic assessment of the real future need.

The plan is based on what appears to be an overly pessimistic evaluation of housing need which is not sufficiently supported and appears to result in a housing assumption that is excessive. The SHMA itself notes it is 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. There isn't any evidence that the Vale have conducted any further work before adopting the SHMA figures. I have reservations about whether the number of new jobs assumed is realistic and commented previously about the jobs to houses ratio. This basic premise still appears unrealistic too – not least because the price of housing is out of reach for single earner household. An assumption of 2 wage earners per new house is more realistic. The need for affordable housing appears to be an add on rather than part of the housing provision.

Core Policy 7 Providing Supporting Infrastructure: There is a lack of appropriate infrastructure to support the Plan as outlined. The Plan does not adequately address how public services and infrastructure, such as the road network, which are already over-stretched can be improved within the timescales to meet what would be a significant increase in use. The Vale would not be able to accommodate this level of growth. The already planned and in progress developments are already putting excessive strain on the infrastructure and the current traffic issues with the A417 are already unacceptable and the plans to alleviate this are not adequate or timely. The impact on the environment and the countryside has not been fully considered. The support for reopening Grove station is considered appropriate and necessary to meet current infrastructure needs. The Vale is encourage to lobby for this change and for this to happen without delay. Other infrastructure to support any level of development (shops, schools, healthcare) remains an issue. The market town of Wantage is to be treasured. It is a very appealing town of historical interest. The local council has worked to encourage local retailers and this is commended. However, it is insufficient to accommodate the number of houses suggested in the local area and if it was expanded its appeal and its historical character compromised. The flood risk of the area is not adequately addressed.

Core Policy 13 SHMA figures as targets has led to the Oxford Green Belt, Core Policy 8 – Spatial Strategy for Abingdon & Oxford fringe Sub Area & Core Policy 15 – Spatial Strategy for SE Vale Sub Area: There is allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB) that is not appropriate. 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 would undermine the rural character of the Vale. A further 11 sites are proposed for removal from the Green Belt. This leads to a concern 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. All of this mean that the Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it 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 Government's position on Green Belt policy 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.

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. The legislation protects the AONB and its setting with means adjacent areas. The plan encroaches into the AONB and its setting and does not adequately demonstrate that this is in the public interest. And thus should not be adopted.

Other concerns such as the way the plan may be implemented and monitored which formed part of my previous submission remain valid and I refer you back to that submission.

I remain concerned that the plan does not adequately seek to preserve the AONB, heritage sites, the rural community and its characterful villages and towns and should not be adopted in its current form. Serious and critical review of the assumptions is necessary with the likely consequence of a large downward adjustment in the housing need and better supporting provision.

Caroline Ball

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