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To: Planning Policy Vale <planning.policy@whitehorsedc.gov.uk>
CC: Ed VAIZEY <VAIZEYE@parliament.uk>
Date: 19/12/2014 09:04
Subject: Vale of White Horse Local Plan Part One; Strategic Sites and Policies - Publication Stage Representation Form.
Attachments: CPRE_OXON_RESPONSE_TO_VALE_LOCAL_PLAN_-_12_Dec_2014_-_final_draft_(2).docx; VWHDC Local Plan - FINAL Infrastructure requirements (1).pdf

.Vale of White Horse Local Plan Part One
Strategic Sites and Policies
Publication Stage Representation

From Great Coxwell Parish Council

Great Coxwell Parish Council wholly endorse the views of WVV, below, and that of the CPRE, document attached; and that of the Hindhaugh report, pdf attached, into the upgrades needed for the A420.
UNSOUND - Core policy 4 pg. 38 and pg. 87 - Throughout the Local Plan Great Coxwell is defined and referred to as a "smaller village". When it is put into a table with 400 houses to be built in its parish the classification changes to "larger village" this inconsistency is unsound.

Strategic Housing Market Assessment

The SHMA report proposes building 20,560 houses in the Vale to 2031 representing an increase of 7,430 from the Local Plan published in 2013. We have not seen any published evidence that such targets could be achieved in a sustainable way, without damaging our local environment and overwhelming our infrastructure? We believe these figures are unwanted, unsound and unachievable. We believe you have a duty to supply and publish the evidence that the Vale has undertaken a proper analysis instead of just accepting these figures blindly as appears to be the case. If the Vale is to use these SHMA figures to justify development the figures need to be robustly sound. Their soundness has not been proved.

Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 7, 8, 13, 15, 20 and 44 unsound. There can be no presumption of "sustainable development" based on the exceptionally high projections of housing need proposed in the Oxfordshire SHMA,

Transport and Infrastructure Constraints

The main reason for the increase in the housing figures is the highly speculative "committed economic growth" being imposed by central government and by ambitious economics plans for employment at the Vale Science area at Harwell and Milton and in Oxford. Bearing in mind this is seen as the main new employment area in the Local Plan, why are 1650 houses being built in the rural Western Vale when it is blatantly obvious that the residents of these houses will need to travel to employment elsewhere? You are proposing this despite the requirement in NPPF Paragraph 158 that "strategies for housing and employment in local plans should be integrated" and that the need to "travel to work" should "be minimised" (NPPF 4.34.) The plan proposals are therefore simply not sustainable without a clear and unequivocal commitment, as a precondition to development, to the essential upgrading of the A420. It is obvious that essential improvements to the A420 should be a precondition to any housing development in the Western Vale. We therefore endorse the Western Vale Villages submission on Core Policy 7 of the Plan, which outlines modifications and improvements to the A420.

Coalescence of Villages

There needs to be a policy included in the Local Plan to prevent building on important areas of green space between villages to prevent coalescence, ie in Faringdon/ Great Coxwell, an area once classified by the VWHDC as an area of 'High Landscape Value' and 'Important open space between town and village'.

From Western Vale Villages
Representation

1. This representation relates to the Vale of White Horse Local Plan.
2. The representation is filed by Peter Martin on behalf of the WVV consortium of parish councils whose address is care of Mrs M. Brown, The Old Barn, Bourton, Swindon, Wilts, SN6 8HZ and whose email address is maggieoldbarn@aol.com. WVV comprises the parish councils of Bourton/Wanborough/Bishopstone/Ashbury/Longcot/ Watchfield/Shrivenham/Woolstone/Great Coxwell, and the Compton Beauchamp parish meeting. The representation is supported by other parish councils whose names are listed on the April 2014 SOCG to which VWHDC/Swindon BC/OxCC are parties. As to the SOCG see further below.
3. WVV adopts without qualification and incorporates in this representation the findings and conclusion of the Communities and Local Government Committee of Parliament announced on 16th December 2014.
<https://mail.google.com/mail/u/0/?tab=wm#inbox/14a529d429985cca?compose=14a57b1ee43ca7b7>. In particular WVV endorses the observations by Clive Betts MP chairman of the committee and widely reported that, in our simple paraphrase, the NPPF system, while not unfit for for purpose, requires reconsideration and possible reform.
4. WVV adopts and incorporates in this representation a set of representations prepared by CPRE and circulated on 15th December 2014 or any final iteration of that draft as may be filed by CPRE. See attached document CPRE Oxon Response to Local Plan or any final text filed by CPRE. WVV reserves the ability to amplify, in written or oral evidence to any EIP, points made by CPRE which deal less than fully with specific concerns in the Western Vale.
5. WVV adopts without qualification and incorporates in this representation a report by Bob Hindhaugh relating to the A420 dated December 2014 and which was sent to OxCC/SBC/VWHDC on 16th December 2014 by WVV. The infrastructure proposals for the Western Vale area and in particular for the A420 are inadequate by comparison with the needs highlighted in the SOCG and the Hindhaugh report.

6. WVV adopts and incorporates into this general representation the representations of each and every WVV member and the representation of such other VWH parish councils as participated in the SOCG and will use them at EIP with and only with their individual and collective consents..

General observations

1. Although there have been public meetings for discussion of the draft plan, the public consultation has been almost exclusively by the dissemination of documentation by means of the internet. BroadBand in parts of rural Oxfordshire is poor and there is no high speed BroadBand in the WVV area, as to which please see <http://www.betterbroadbandoxfordshire.org.uk/postcode-map#>. WVV argues that in view of the practical difficulties caused by the poor BroadBand coverage, there has been no or no adequate consultation as it has proved impossible for some or all WVV members to consult all or all relevant documents filed by VWHDC.

2. In addition to VWHDC, there are 3 other district councils in Oxfordshire, namely, Cherwell DC, West Oxford DC and South Oxford DC plus Oxford City Council. Adjoining the VWH area lies Swindon Borough Council ("SBC") which shares responsibility for the A420 with OxCC. The SBC EIP of its draft local plan has taken place and is now in its final administrative stages. The EIP of the Cherwell DC draft local plan is part heard and unlikely to be concluded till mid-2015. The EIPs of the remaining Oxfordshire draft local plans, as yet unpublished, have yet to take place and may not now conclude until 2016 and certainly after the May 2015 Parliamentary and local government elections.

3. As may be seen from the report of the Parliamentary committee cited above it is possible that NPPF and related government policies may change; clearly there must now be some uncertainty whether the NPPF has been, is being, and will in the future be interpreted consistently by LPAs and the Planning Inspectorate. In this context it is noteworthy that the Parliamentary committee has pointed out how very few local plans have so far been approved. See current Planning Inspectorate data. Thus there is great uncertainty about the "correct" interpretation of the NPPF, as pointed out in the committee report. This uncertainty leads to the abuses noted in the report, some of which have already occurred in the VWH area.

4. In the case of the VWHDC draft local plan, housing numbers may well be affected by the extent to which the overall SHMA figures may need to be adjusted to take account of, for example, insufficient land in Oxford City to meet housing need with the possible result, given the statutory duty to cooperate, additional housing demands possibly being transferred into the VWH area. As to the statutory duty to cooperate see <http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/what-is-the-duty-to-cooperate-and-what-does-it-require/>. It has not or not transparently been complied with. For example, has there been any cross-border cooperation with Swindon Borough Council in housing matters? We ask as there is no evidence of it.

5. Thus, for reasons of timing if none others, the VWHDC draft plan is premature, unsound, and unsustainable and should be fully withdrawn and wholly revised after meaningful instead of meaningless consultation (as was the case with the draft local plan) since it is here argued on behalf of WVV that the duty to cooperate on SHMA issues and housing numbers, as also upon infrastructure issues, all require discussion and cooperation BEFORE local plans are presented for inspection and approval and not after. This has manifestly not occurred in the case of Oxfordshire as debate at the Cherwell EIP so clearly shows. If for no other reason, it is argued, the VWH draft plan is unsound on general principles.

6. In the matter of infrastructure, taking the A420 corridor as an example, an SOCG was concluded at the end of March 2014 and is dated "April 2014" on the face of the document. Since that time, no or no recorded discussion between officials of VWHDC/OxCC/ SBC has taken place and the matters dealt with in the SOCG have seemingly not advanced in the intervening months. Unless and until a sound infrastructure plan to manage the well-known difficulties of the A420, and other major routes in the area, has been settled between the relevant parties the VWHDC draft local plan is unsound on this critical issue. See SOCG

file:///C:/Users/Peter/Downloads/Statement%20of%20Common%20Ground%20-%20Vale%20of%20White%20Horse,%20Oxfordshire%20County%20Council%20and%20Swindon%20Borough%20Council%20(pdf

Participation at the oral part of the examination.

In support of the matters dealt with in this representation WVV wishes to be heard and to adduce oral and/or written evidence either on behalf of the WVV members as a consortium or on behalf of individual parish councils as the need may arise. In particular, but without prejudice to the foregoing, WVV and other parish council participants in the SOCG wish the evidence oral and written of Bob Hindhaugh and/or his associate Simon Boone of Bob Hindhaugh Associates Limited, our road transport and traffic consultants, to form part of the oral examination .

For and on behalf of WVV steering group
Peter Martin