



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

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

Mrs

First Name

Jane

Last Name

Guest

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

The Monks House

Line 2

The walk

Line 3

Islip

Line 4

Oxon

Post Code

OX2 9PU

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: Mrs Jane Guest

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

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

- I fully agree with the arguments presented by CPRE showing why the SHMA figures should properly be regarded as inflated and unsustainable.
- The SHMA relies on the Oxfordshire Strategic Economic Plan (SEP), to provide the economic base line and the associated adjustment for planned jobs growth on which its predictions are based.
- The SEP has not been subject to full and appropriate public consultation or any independent scrutiny, and is therefore not a fair basis upon which to make policy decisions. Has it followed due democratic process?
- I support the CPRE's conclusion that the Oxfordshire SHMA is utterly disproportionate and unrealistic.
- The NPPF requires the economic, social and environmental aims to be pursued 'jointly and simultaneously'.
- The SHMA is overly influenced by the Oxfordshire SEP. Because this has not been subject to any public consultation, the growth targets have been effectively excluded from the local planning process, and there has been no opportunity to assess the economic, social and environmental aims.
- The risk of serious harm from over development is a serious threat . Builders' preferences for lucrative greenfield land will lead to a pattern of development that is 'modern-box like' cramped, low cost housing and will

put inappropriate pressure on rural Oxfordshire and will divert urban investment and regeneration elsewhere in more suitable sites.

- The requirement to fit into the built environment of the principally historic village, is all too readily disregarded by the authorities, who look at numbers, rather than the aesthetic and wider impact of their decisions. Due regard to and consideration of the views of the community should be shown respect and due diligence by those entrusted to investigate these decisions.
- This will be damaging as an attractive location and detrimental as a future place to live. It will impact upon house prices and change the nature of the community. In particular, the damage to areas such as Cumnor as a small village, with a vibrant supportive community, will be irreversible.
- The emphasis on 'new build' means that the vast majority of new households cannot afford to buy or rent new houses at market prices.
- More thought and investment should be given to changing the current housing market and industry structures to provide 'genuine solutions' to those in need of affordable housing, within communities where jobs are really located, without long, difficult commuting.
- There are nationally so many existing homes/buildings in disrepair/decay that these should be brought back into functional use, by both local and national monetary grant support to restore and renovate. This would then support the apprentice schemes which support sustainable buildings using traditional skills and materials, rather than lining the pockets of developers, who speed build homes that will most unlikely survive the test of time.
- Oxfordshire is already planning its new town in Bicester. Perhaps this could/should absorb all future new building quotas where the infrastructure is being planned to cope?

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

The SHMA figures should only be taken into account, alongside the figures derived from published government household projections thereby using the most probable values for all input parameters rather than extreme figures.

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?

☒

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:

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

Signature:

Submitted by e mail from the address in Part A

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation : Jane Guest

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

Paragraph

Policy

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

- The comments about the lack of reality in the SHMA figures and target construction figure looks inflated and over optimistic, so developers will secure the newly identified development sites with planning consent for construction, purely for their personal means to make money.
- The Vale accepts that it cannot make up the backlog of the five-year housing supply within the time span, so it has subscribed to an economic plan that generates an unnecessary need for even greater construction. It begs the question why there is a perceived need for building in the affluent south of the UK, when there is a greater requirement for regeneration and development in the North, Midlands, Wales etc.

The National Planning Policy Framework identifies three requirements for sustainable development – economic, social, and environmental

Economic

- The infrastructure is overstretched and the money proposed to help with the A34 is barely enough to resolve this issue.

Social

- I totally support the CPRE's comments concerning the social and environmental issues.
- Green belt should mean 'green' and remain so, as was sold to us and our

forefathers, not the dilution into a built environment.

Environmental

- The NPPF requires plans to contribute to protecting and enhancing the natural, built and historic environment. The Update plans the piecemeal addition of houses on a number of green-field sites (many in places where they will permanently impact on the character of existing country villages), a major encroachment into the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and building on 4 areas currently classified as Green Belt. It also proposes to remove 18 other areas from the Green Belt that 'may be considered for development as part of preparing the Vale Local Plan Part 2' (Housing Delivery Update, February 2014, para.4.23). These plans demonstrate disregard for the environmental requirements of the NPPF and recent Government guidance (October 2014).
- Green belt was created to ensure the country had an environmentally protected area for those living in it, near it, or to go out from the city to enjoy it, offering somewhere to walk, breathe fresh air and value the natural world. One large conglomerated sprawling city is not ideal. Whilst it is accepted there is a national need for housing, it needs to be more carefully planned and placed and certainly NOT on current green belt land.

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

Sites should not be included in the Plan.

The Vale should critically review the figures emerging from the SHMA to avoid the unsound aspects highlighted above, and to prepare an appropriately revised plan, with due regard to all interested parties ie the community.

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?

☒

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:

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

Signature:

Submitted by e mail from the address in
Part A

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation Jane Guest

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

X

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

These comments refer the Vale District Council's *Core Policy 13: The Oxford Green Belt*

General comments

- The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts.
- Since the approval of the Oxford Green Belt in 1975, the Vale has been at the forefront of defending it against inappropriate development and protecting the unique character and landscape / rural setting of Oxford by preserving its openness. As a result, the Oxford Green Belt has stood the test of time and, in accordance with Government policy, the land has been kept permanently open and the countryside safeguarded from encroachment. This policy reflects deserved credit on the Vale Council.
- Paragraph 79 of the National Planning Policy Framework sets out Government policy on Green Belts:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

- 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.
- The extensive guidance provided by the Government that supports this conclusion is set out by CPRE in its submission.
- In the Plan the Vale proposes to remove 22 sites from the Green Belt. The proposal is against Government's aims, and would be unnecessary if the SHMA housing figure had been tested properly and reduced in the light of social and environmental considerations. This appears to be contradictory.
- The Council – and the Sustainability Assessment (SA) commissioned to underpin it – both fail to take proper account of the footnote to paragraph 14 of the NPPF on which the Government Guidance is based. 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 have tested the SHMA number against those restrictions. The sustainability assessment therefore wrongly accepts the inroads into the Green Belt as sanctioned by the NPPF, when they quite clearly are not.
- The plan is therefore unsound and unsustainable
- More seriously even in areas such as Cumnor, where the immediate threat of a development of houses has been withdrawn, the Vale still proposes to go ahead and remove the areas from the green belt. This would enable the Vale to sanction building in the current green belt as a two stage process: first remove the areas from the green belt, then approve the developments at a later stage, through a stealthily underhand manner . This is not acceptable to the majority of the community and this will be proved, at every level, in the fullness of time.

Cumnor specific comments

Eight separate sites are scheduled for removal from the green belt. It has proved impossible, given the presumption of the permanence of the green belt to determine why these areas were selected for removal from the green belt. It seems random and could be questioned as undemocratic. The only guidance was an oral response to a question suggesting that to the Vale these changes 'rounded out' the built up areas and left the green belt looking more like a green belt. This does not seem to be an acceptable reason for removing areas from the green belt. If it was designated green belt, this is what it should remain.

- It is unnecessary to understand precisely where the following areas are located: they serve only to underscore the lack of any acceptable logic in the Vale's approach.
- Area 1 (west of Tilbury Lane Botley Map). The Cumnor portion of this area was not sold because it is located directly under Oxford's 400kV electricity supply line and consequently is unsuitable for development. It is also located next to the busy A420.
- Area 2 is a recreation ground and contains a football pitch.
- Areas 1 and 2 are joined by a small copse and together form a welcome green spear. Their removal from the green belt would clearly serve no useful purpose, but would lose an area used by many for walking.
- Area 3: any future development will significantly change the view of the Green Belt when travelling west on the A420.
- Area 4: is a contiguous part of the current Green Belt and its open vista is

a major contributor to the views available of the Cumnor Conservation Area. It could not be developed in any way without jeopardising the purpose for which both the Green Belt and the Conservation Area was set up. This was initially recognised by the Vale's officers who said that as this area could not be built on there was no reason to remove it from the green belt. No reason was ever given publicly for their subsequent change of view.

- Area 5 is a green area that reaches into the heart of the village and contributes greatly to the village nature of old Cumnor, which is the essential feature that the Conservation Area is designed to protect. The ground to the west is a sports field and recreation area owned by Cumnor Parish Council. This area too was originally recognised by the Vale's officers as offering no reasons for removal from the green belt. The subsequent change of view on this area was never justified.
- Area 6 was the area originally identified as being suitable for inclusion in the Vale's proposed building programme. The idea was subsequently dropped though the Area is scheduled to be removed from the green belt; The land involved is high quality agricultural land which includes a field with a Saxon pattern of ridges and furrows bordered by an ancient hedgerow. This parcel of land is of considerable heritage interest, located as it is close to the centre of Cumnor.
- Area 24 is at the very centre of the Village and largely consists of the existing cricket ground and the grounds of Cumnor Place. As such it is said to contain the remains of the largest unexcavated Elizabethan garden in England.
- It would be a scandalous to build upon these areas and must be prevented. Please support the protection of this village. I was born in the village, attended the local state school, and wish to keep it as green as possible for my children and grandchildren..

These changes were not properly consulted upon.

- The consultation procedure followed by the Vale was inadequate both in terms of the time, timing and the manner in which it was conducted. (An open democratic process feels a long way off from the crafty slipping in and u turn).
- The complexity of the process, finding the information and process to object is extremely challenging and not readily accessible to the average person. The number of persons complaining on the email user group about the process is extraordinary, many of whom are highly intelligent individuals! It is certainly not in clear, jargon free, accessible language.
- The time allocated did not allow the Parish Council sufficient time to consult with residents and it was only able to respond by holding an Extraordinary Council meeting. This would appear to be undemocratic and politically unsound , which may need to be further challenged by European law.
- The contents of the leaflet supplied by the Vale were profoundly ' minimal' and inadequate. It set out the Vale's case for building houses but failed to cover any of the surrounding issues nor did it mention that the Vale was consulting on a wider range of sites.

The Vale avoided opportunities to draw this wider consultation to the attention of residents:

- The leaflet did not make any explicit reference to the advice that the Vale had sought and received, nor did it state that the Vale was simultaneously seeking comments on its additional proposals to remove areas other than

- the Strategic sites from the Green Belt.
- No mention of the extended consultation was made at the meetings which the Vale called to launch the Strategic Housing Consultation process and could be perceived by some as mistruth by omission.

The inescapable conclusion is that the manner in which the Vale carried out its review was entirely unacceptable and raises the question 'why?'
Back door, underhand scheming without proper consultation is how it feels to me. I was born in Cumnor and my father was a house builder, who saw the need for house building as I do, but fully respected and delighted in the fact there was a green belt to protect this beautiful village, and other villages with open spaces, and celebrated a perfectly sized community in which to live. Brown field sites elsewhere need further investigation before tampering with the Green Belt.

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

The sites in the Oxford Green Belt that have been identified for housing, should be withdrawn from the Plan.

All reference to the green belt review and its conclusions should be removed from the plan. The green belt should NOT be tampered with in any manner. It should remain as a green protected belt, just as it currently stands for the future of our children and grandchildren.

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?

☒

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:

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

Signature:

Submitted by e mail from the address in
Part A

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation : Jane Guest

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

Paragraph

Policy

44

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-
operate

Yes

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

The comments in this section refer to the Vale Council's Core Policy 44:
Landscape: Area of Outstanding Natural Beauty.

I fully support the comments made by CPRE.

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

The sites proposed for house building in the AONB should be withdrawn and the total Plan reduced accordingly.

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?

☒

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:

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

Signature:

Submitted by e mail from the address in Part A

Date:

