



**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

Dr

First Name

Jim

Last Name

Halliday

Job Title

District Councillor

(where relevant)

Organisation

(where relevant)

Address Line 1

Dolphin House

Line 2

Abbey Close

Line 3

Abingdon

Line 4

OXON

Post Code

OX14 3JD

Telephone Number

E-mail Address

(where relevant)

Jim.halliday@whitehorsedc.gov.uk

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph

Policy

Core Policy
4: Meeting
Our
Housing
Needs

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

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 SHMA does not set housing targets." This is a direct quote from the GL Hearn SHMA report (page 183, para 9.63).

Yet the Council has chosen to adopt the SHMA number, unmodified, as the Vale of White Horse District Council's housing target.

Like many people I have been interested to learn more how the housing target in the SMHA has been calculated. I had assumed that the starting point would be detailed studies of the employment and housing needs of the Science Vale area, which would inform the Economic modelling carried out by Cambridge Econometrics, which in turn would feed into the SHMA report. I was amazed when I read the "Science Vale Housing and Employment study report to find that a) it had been written by GL Hearn Ltd (the same consultants who had written the SHMA), b) the final draft was dated August 2014 – some 2 months after the SHMA report was published, c) it stated that its starting point was the SHMA report !

The authors very carefully tried to disaggregate the SHMA employment numbers for the whole Science Vale area and then split them into South Oxfordshire District Council (SODC) and Vale employment numbers. It then made assumptions about whether people would live in the Vale and work elsewhere or do the opposite, then made assumptions about household size to finally produce figures of jobs and housing need in Science Vale. I would suggest that this whole process is back to front. The Science Vale strategy should have informed the SHMA not the opposite!

Furthermore, like many people I have been puzzled by the increase in jobs in the agricultural sector that was being assumed by the Cambridge modelling. I found a very useful and very thick report – the Oxfordshire Local Enterprise Partnership's Strategic Economic Plan – this 168 page report was published in March 2014 (before the SHMA report) and the LEP say "this is our bid to Government for Local growth funding". It explained whilst DEFRA predicted an 8.5% increase in jobs to 2020 there was also a considerable amount of agricultural research in Oxfordshire. I then realised that it was possible the LEP lobbying document was being used as a source for the economic modelling assumptions !

I was interested to note that the LEP document expressed concerns about the availability of enough skilled people to sustain the predicted growth and crucially said "Despite the significant levels of new homes planned in Oxfordshire over the next 15 years, local housing is at the limit of affordability for many who live and work here". Many jobs in the Science Vale area are publicly funded research posts – a sector in which pay rates are becoming less attractive as the economy picks up – this will mean despite the optimism assumed in the LEP report and the SHMA report, that the huge increase in employment may not take place, and even if it does the workers may not be able to afford to live in the Vale but will have to commute in from areas with lower house prices. I already know of Science Vale workers who commute in from Swindon, Lechlade, Newbury, Marlborough and further afield.

In summary, for all these reasons, I do not agree that the Cabinet should have used the unaltered SHMA housing numbers for their housing target.

Furthermore, I am concerned that the Council has assumed build rates that are unrealistic – this policy takes no account of the availability of raw materials such as bricks, nor of the skilled building labour needs – both of which are in extremely short supply.

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.

Take account of the SHMA economic forecasts, but also take account of how much development can be sustainably accommodated, and the social and environmental impacts of increasing the number of dwellings in the District by over 40% by 2031 (from the current 50,000 to over 70,000).

Substantially reduce the housing requirement from 20,560 - remove the four sites totalling 1,510 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270) and the allocated sites in the Green Belt, and constrain the amount of development being proposed for the AONB area.

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

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:

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph	<div></div>	Policy	Core Policy 7 – Providing Supporting Infrastructure and Services	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div></div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	NO
4 (3) Complies with the Duty to co-operate	Yes	<div></div>	No	<div></div>

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.

There is insufficient appropriate infrastructure to support the plan. Roads, schools, utilities, community facilities, local GP Surgeries and hospitals cannot possibly be sufficiently improved within the time-scale to 2031 to meet such great increase in demand.

In particular the infrastructure requirements in the Oxford fringe are extreme – particularly in the area of transport eg the proposed extension of the Lodge Hill junction on the A34.

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Do not allow any development in the Oxford Green belt until the required infrastructure is in place.

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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Signature:

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph		Policy	Core Policy 8 Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	NO
4 (3) Complies with the Duty to co-operate	Yes		No	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 Plan identifies four development sites in the Oxford Green Belt to accommodate 1,510 dwellings. A further 11 sites in the Green Belt are proposed to be removed from the Green Belt. This is based on the Vale Council's so-called "local Green Belt Review"; it was no such thing, it was a search for housing sites in the Vale's portion of the Oxford Green Belt. No allocation of sites in the Vale's portion of the Oxford Green Belt should be made until a full joint review of the entirety of the Green Belt is completed by all five Oxfordshire Districts and the County Council. Indeed recent Government statements seem to indicate that the partial review of a Green Belt is undesirable.

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.

Remove the four allocated sites in the Oxford Green Belt totalling 1,150 dwellings (N Abingdon 800, NE Abingdon 200, NW Radley 240 & S Kennington 270) and reinstate Green Belt designation for the 11 further sites proposed for removal from the Green Belt. Delete all references to the "local Green Belt Review".

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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Signature:

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph	<input type="text"/>	Policy	Core Policy 13 – The Oxford Green Belt	Proposals Map	<input type="text"/>
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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	NO
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	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 “local Green Belt Review” (para 5.40, p 62) was a search for housing sites in the Vale's portion of the Oxford Green Belt. In paragraph 1.21, pages 16-17 of the Local Plan, Strategic Sites & Policies document, the Council sets out how the Vale Council will work with the County Council and the other Oxfordshire District Councils to complete an Oxfordshire-wide Strategic Green Belt review.

I believe that no land should be removed from the Vale's portion of the Green Belt and no strategic sites should be allocated until this comprehensive review is completed.

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.

Remove the four allocated site totalling 1,510 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270) and reinstate to Green Belt designation the further 11 sites proposed for removal from the Green Belt. Delete all references to the “local Green Belt Review”.

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.

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No, I do not wish to participate at the oral examination

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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:

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:

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph

Policy

Saved
policies

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

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.

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- a) I note that it is proposed to save policies CF3 and CF4 from the 2011 local plan in order to safeguard land at Faringdon and Wantage for burial sites. I submit that similar safeguarding of land for a burial site needs to take place in Abingdon. I made just such a comment at the earlier stage of this local plan consultation but my suggestion was ignored and instead the land zoned for housing – the land to the North of Abingdon.
- b) The 2011 Local Plan safeguarded land along the route of the former Wilts and Berks Canal – I am concerned that this safeguarding seems to have been removed in the 2013 draft plan – although the previous policies (L14 and L15) have been “saved”.

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.

- a) Remove the two of the sites allocated for 1,000 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200)
- b) Safeguard the land along the route of the former Wilts and Berks canal as per the saved policies : L14 and L15

POLICY L14 :DEVELOPMENT WHICH WOULD CAUSE DEMONSTRABLE HARM TO THE ESSENTIAL CHARACTER OF THE WILTS AND BERKS CANAL OR TO ITS SETTING, OR WOULD BE LIKELY TO PREVENT OR IMPAIR THE RESTORATION OF THE CANAL, OR WOULD RESULT IN THE LOSS OF ANY BUILDINGS, LOCKS OR OTHER STRUCTURES ASSOCIATED WITH THE ORIGINAL WATERWAY FUNCTION OF THE CANAL WIL NOT BE PERMITTED. DEVELOPMENT ON OR CLOSE TO THE ROUTE OF THE CANAL WIL BE REQUIRED TO FACILITATE DEVELOPMENT OF ITS RECREATIONAL POTENTIAL AND/OR PROTECT ITS NATURE CONSERVATION AND HERITAGE VALUE. DEVELOPMENT THAT WOULD PREVENT THE RESTORATION OF THE CANAL ON ITS HISTORIC ALIGNMENT AS SHOWN ON THE PROPOSALS MAP WIL ONLY BE PERMITTED IF ARRANGEMENTS FOR THE REINSTATEMENT OF THE CANAL ON A VIABLE ALTERNATIVE ROUTE CAN BE SECURED BY THE DEVELOPER.

POLICY L15 DEVELOPMENT WHICH WOULD PREVENT THE IMPLEMENTATION OF THE PROPOSED NEW ROUTE FOR THE CANAL SOUTH OF ABINGDON AS SHOWN ON THE PROPOSALS MAP WIL BE REFUSED

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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

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:

I have been a local councillor for over 20 years and have a good understanding of the local area. I also work in scientific research and have a good feel of the likely employment needs of this sector.

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:

James A Halliday BSc, PhD, CEng

Date:

18 December
2014