

From: [REDACTED]

Date: 18/12/2014 09:03

Subject: Fwd: 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

PLANNING POLICY DEPARTMENT

VALE OF WHITE HORSE DC AND OTHERS.

PLEASE RECEIVE THE MESSAGE FORWARDED BELOW; BROADBAND IN THIS AREA SO POOR IT IS NECESSARY TODAY TO SEND MESSAGE TO MYSELF BEFORE FORWARDING TO BE SURE SYSTEM IS WORKING LOCALLY.

RGDS

PM

0900 18/12/14

----- Forwarded message -----

From: Peter Martin [REDACTED]

Date: Thu, Dec 18, 2014 at 8:45 AM

Subject: Re: Vale of White Horse Local Plan Part One;Strategic Sites and Policies - Publication Stage Representation Form.

To: Peter Martin <[REDACTED]>

Vale of White Horse Local Plan Part One

Strategic Sites and Policies

Publication Stage Representation

*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 Coun

cil 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 WWHDC/OxCC

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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

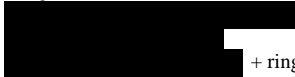
SOCC file:///C:/Users/Peter/Downloads/Statement%20of%20Common%20Ground%20-%20Vale%20of%20White%20Horse,%20Oxfordshire%20County%20Council%20and%20Swindon%20Borough%20Council%20(pdf

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

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+ ring before faxing.