



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph
2.126

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

N/A

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Oxford-Cambridge Expressway & Growth Corridor

The probable Expressway development is effectively confined to a footnote in the Plan, and its magnitude unrecognised, when it will (if it proceeds as expected) be by far the largest transformative planning event in the District, and will affect the extent and location of site allocations made in the Plan.

The proposal is for a new Growth Corridor between the M4 and M11, branded the Oxford-Cambridge arc, within which would be a new Expressway. The aim of the Expressway is not connectivity but to facilitate a million more houses and the development of businesses to employ their occupants. On a pro rata basis that is 10,000 houses per mile of its length.

Although CPRE are campaigning for a Public Inquiry into route choices, Highways England's current plan is to announce its preferred route in July 2018 (perhaps before the Inspector's decision letter following the Vale EIP) and confirm it in July 2019 following a Public Inquiry into the single preferred route.

The aim is to commence building the route in 2025 or earlier, that is well within the period of this Plan review. The alternative routes presently under consideration are an upgrade of the existing A34 to improve flows and capacity or a new road branching off it between Didcot and North Abingdon, heading East across the Green Belt South of Oxford.

Either way, the development and the housing and employment obligations it entails will be

far and away the biggest event during the Plan period which runs to 2031.

Although the Vale had written to the NIC in August advocating a Southern Route and proposing it *will best deliver the (growth) outcomes sought by the commission*, and the Vale's "Didcot Garden Plan" published in June 2017 explicitly advocates a Southern route, this Plan Review merely states that the development *could have major benefits in relieving strategic traffic from the A34 and bringing further investment to the Science Vale*. Use of the word "relieving" implies that the Council favours a new Expressway South of Oxford rather than upgrading of the existing road, but the Plan Review is silent on the major environmental impact, and the implications of the obligation for the 100,000 new houses and 700,000 jobs the Expressway carries with it.

We say that that approach is unsound and that the Plan needs to be more open about the nature and implications of by far the largest likely development during the Plan period, which could radically alter and increase the site allocations within it.

(Continue on page 4 /expand box if necessary)

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

To be sound, and given that the route of the Expressway will be known by July 2018, the Plan should be suspended until it can be re-assessed and include the implications in the Plan period of the Expressway, given that Highways England plan to start construction as early as possible after the 2019 Public Enquiry, perhaps as soon as 2020, only three years from now, and with eleven years of the Plan period remaining.

At the very least an annex to the Plan Review should be provided, detailing the implications of the Expressway, which have clearly been carefully considered by the Council, and whether or not it would affect or increase proposed numbers, sites or allocations.

(Continue on page 4 /expand box if necessary)

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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?

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:

It is expected that this matter will be the subject of argument across the floor at the Inquiry, and that by that time there will be more certainty informing the proposals. It will be helpful to the Inspector if we participate.

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

Signature:

Date:

Sharing your personal details

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Title

Mrs

First Name

Helen

Last Name

Marshall

Job Title (where relevant)

Director

Organisation representing
(where relevant)

CPRE Oxfordshire

Address Line 1

20 High Street

Address Line 2

Address Line 3

Postal Town

Watlington

Post Code

OX49 5PY

Telephone Number

01491 612079

Email Address

director@cpreoxon.org.uk

2. Agent's Details (if applicable)

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy

Policies Map

CHAPTER 3 - DEVELOPMENT MANAGEMENT POLICIES

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

4. (2) Sound

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New Policy relating to North Wessex Downs Area of Outstanding Natural Beauty

Given that a considerable percentage of the Vale of White Horse District lies within the North Wessex Downs Area of Outstanding Natural Beauty, CPRE believes that the current Plan cannot be considered sound unless it includes a policy addressing the specific development requirements of this designation.

This would be in line with the recent discussions with a Planning Inspector as part of the West Oxfordshire Local Plan Examination in summer 2017. At the Inspector's request, West Oxfordshire District Council, the Cotswolds AONB and CPRE Oxfordshire have now agreed a Statement of Common Ground outlining their agreement on such a policy (see response to Q6 below).

The inappropriate deletion of Local Plan 2011 policies, including saved policies

With the removal of so much greenfield land under the Local Plan 2031, it is incumbent on the District Council to give no less a protection to its landscape and to its historic buildings as was given in the Local Plan 2011. In that earlier Plan and the policies saved until now

from that Plan, there were a number of policies that gave specific reference to vital protection for specific location and types of landscape and to historic buildings and sites.

CPRE does not accept the contention, in the Appendix to Topic Paper 6, that ‘*Core Policy 44 in the Part 1 Plan and the emerging Landscape Character Assessment will provide sufficient level of detail*’. Who has made this judgment and on what precisely is it based? Policy 44 and the Assessment quite obviously do not provide the same protections as the 2011 specific policies did.

We here follow the spirit of the publication version of Local Plan Part 2 – we quote from Paragraph 3.62:

‘The Local Plan 2031: Part 2 sets out additional detailed policies to complement those set out in the Part 1 plan’ and CPRE proposes policies for addition or modification to those in Chapter 3 of the present document.

(Continue on page 4 /expand box if necessary)

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Policy to replace NE6 relating to North Wessex Downs Area of Outstanding Natural Beauty

CPRE proposes the following wording:

‘In determining development proposals within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and proposals which would affect its setting, great weight will be given to conserving and enhancing the area’s natural beauty, landscape and countryside, including its wildlife, historic character and heritage assets. The North Wessex Downs AONB Management Plan and guidance documents are material considerations in decision making relevant to the AONB.

Major development will not be permitted within the AONB unless it satisfies the exceptional circumstances set out in national policy and guidance.

Proposals that support the economy and social well-being of communities located in the North Wessex Downs AONB, including affordable housing schemes and small scale renewable energy development, will be supported, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area.’

Policy to replace NE8 relating to setting of Oxford
POLICY NE8

In considering proposals for development affecting the landscape setting of Oxford, especially in areas within view of and from the City, particular regard will be given to the contribution that the surrounding landscape makes to Oxford’s setting in accordance with the 1990 Listed Buildings and Conservation Areas Act, in accordance with national policy on

heritage settings and Historic England's guidance on setting. Development will not be permitted if it would:

- i) Harm the landscape setting and character of Oxford; or
- ii) Harm the setting of the internationally and nationally important listed buildings, conservation areas and registered parks and gardens that form the iconic skyline of Oxford, including effects on views out from and across the city and on the historic character of its surrounding landscape.

Oxford City Council's Heritage Plan documents and policy on the landscape setting of Oxford and views in relation to Oxford's skyline will be treated as material considerations in determining proposals to which this policy applies.

[We would encourage the Vale to consider adding Oxford City Council's 'view cones' and landscape setting characterisation map as an adjunct to its own landscape characterisation.]

Retention of Other Saved Policies

CPRE believes that in order for the Plan to be justified and consistent with Statutory obligations/duties and National Policy, Policies NE7 and NE9-NE12 (inclusive), all consistent with the NPPF and all Saved Policies in Appendix G of Local Plan 2031: Part 1, should be added to Section 3.2 'Landscape' of the Part 2 Plan.

Below we give the numbers and texts of the 2011 Policies which contain the precise wording we propose be included as new policies in Chapter 3, with comments in brackets.

POLICY NE6

~~Development in the North Wessex Downs Area of Outstanding Natural Beauty will only be permitted if the natural beauty of the landscape will be conserved or enhanced. Development which would be visually prominent, would detract from views from public vantage points or would spoil the appreciation of the landscape quality of the North Wessex Downs Area of Outstanding Natural Beauty will not be permitted. Major industrial or commercial development will not be permitted in the Area of Outstanding Natural Beauty unless:~~

- ~~1. It is proven to be in the national interest and no alternative site can be found; and~~
- ~~2. All steps are taken to reduce the impact of the development on the beauty of the Area.~~

This Policy should be replaced as above. It is vitally important that a specific AONB policy should be included, but the last section of the original wording is now unsound because it restricts the scope of 'major development' and does NOT refer to NPPF tests but proposes its own. This is demonstrably in need of replacement as suggested above.

POLICY NE7

Development which would harm the prevailing character and appearance of the North Vale Corallian Ridge, as shown on the Proposals Map, will not be permitted unless there is an overriding need for the development and all steps will be taken to minimise the impact on the landscape.

POLICY NE8

~~The conservation of Oxford's landscape setting will take priority in considering proposals for development in areas within view of the City. Development will not be permitted if it would:~~

- ~~iii) Harm the landscape setting of Oxford; or~~
- ~~iv) Obscure or detract from an important view of the sky line of collegiate Oxford, particularly within the view cones as defined on the proposals map.~~

This policy is not sound because it does not accord with the current concept of setting as defined in national policy, official guidance and many court judgments, that 'setting' is not an asset in its own right but concerns how the surroundings of a place contributes to its

significance. In this instance, the place is an internationally important group of heritage assets whose setting comes within statutory obligations. Great weight national planning issues have been reinforced in relation to this (including not considering setting too restrictively) by several court judgments since 2011. The revised wording above addresses these shortcomings

POLICY NE9

Development in the lowland Vale will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area.

[The 'long open views' are an essential characteristic of the rural Vale and should be specifically protected.]

POLICY NE10

In the urban fringes and important open gaps between settlements, as shown on the Proposals Map, development or changes of use which would harm their essentially open or rural character will not be permitted.

[It is essential that the open gaps between settlements be specified on a proposals map, and that they are protected by a Policy stronger than 'unacceptable narrowing'.]

POLICY NE11

Proposals for development within or affecting areas of damaged or compromised landscape, in particular those areas defined for landscape enhancement on the Proposals Map, must provide a landscaping scheme which enhances the appearance of the area. Development which would further erode or damage the character of the landscape will not be permitted.

[A proposals map should specify damaged or compromised landscapes where enhancement should be a priority.]

POLICY NE12

Development within the Community Forest, as shown on the Proposals Map, must, wherever possible, make a positive contribution towards the creation of a diverse woodland environment appropriate to the landscape character of the area. Proposals which would prejudice the aims and objectives of the Great Western Community Forest will not be permitted.

[A proposals map should specify protected environments.]

(Continue on page 4 /expand box if necessary)

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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:

CPRE represents the views of its members across the District, is well-informed on the issues and would very much wish to contribute to any related discussion.

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

Signature:

Date:

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2. Agent's Details (if applicable)

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First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
4a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

4. (2) Sound

NO

4. (3) Complies with the Duty to Cooperate NO

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Oxford's unmet need

The Policy is not compliant with the duty to co-operate and neither is the whole Submission Plan since no duty to co-operate to provide for Oxford's unmet need can exist until Oxford itself has defined that need. Not only has it not done so but it has resisted all entreaties to do so, and the draft Oxford Local Plan defines neither the unmet need nor Oxford's ability to meet it, should any exist.

CPRE has provided evidence to the Oxford City Local Plan consultation that the City is capable of providing all of its need as determined by the SHMA, and more than twice its need as it would be determined under the Government's new OAN formula now under consultation.

Whilst the local authorities have between them agreed both a notional figure and how this should be divided, this has been an arbitrary process not supported by actual evidence.

Consequently, there can be no requirement, obligation or duty to satisfy Oxford's unmet need and the Vale Plan Review is in that way neither compliant with the duty to co-operate nor justified.

Over-provision in relation to housing targets

The Plan proposes 3,420 houses, bringing the total number of houses planned for the district (ie those proposed in Parts 1 and 2) to 24,748, almost 2,000 more than the housing requirement for the full Plan period (2011 – 2031), of 22,760.

The Plan outlines proposed justification for an additional 1,400 houses within the South-East Sub Area to support economic growth. This is highly questionable given that:

- The overall economic growth targets for the County have never been subject to public consultation or robust examination
- The impacts of Brexit have not been taken into consideration.
- The housing growth proposed is already an addition of some 45% in relation to the housing stock in 2011.

The excuses provided at Para 2.96 give a generic explanation about why housing is needed in the South-East Vale, but do not explain why these additional houses, over and above the original target, are required.

(See also CPRE Oxon response to Policy 15a & b - Additional Site Allocations for South East Vale Sub-Area.)

Even taking the above into account, this still leaves a gap of **nearly 600 houses** that are above target but not explained or justified.

It is unsound to plan for a surplus.

It is unsound to plan for a surplus against a housing target which will never be met in any case. Moreover, if the Plan goes ahead with a surplus, too much land will have been intentionally allocated and will be cherry picked by developers, doing nothing for five-year supply. If the 2,200 (allocated for Oxford's unmet housing need) and the nearly 2,000 surplus, amounting to more than 4,000, were removed from the Plan, it would enable the Council to do away with the need for development at Dalton Barracks, the Harwell Campus, North-West Grove, Kingston Bagpuize, North of East Hanney, East of East Hanney and East Marcham. To put this in context, this would still leave over 20,000 houses being brought forward within the Plan period, the equivalent of a 40% increase in the Vale's housing stock (subject to Pt 3 below).

The SHMA itself is now unsound.

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is itself unsound, as CPRE has said since it was first published. It was never an assessment of housing *need* as it was sold to us, in the sense of local people needing houses, but a tool by which the Oxfordshire Growth Board and Local Enterprise Partnership (LEP) were able to justify industrialising our rural County, attracting tens of thousands more people into the area by building houses for them.

The Government has now accepted as much by publishing much lower housing need figures for Oxfordshire, in the Vale's case reduced by 33%, and in Oxford's case halved (to just 15,000). The Plan should be recalculated on the new OAN numbers to remove the further excess of houses (including the Oxford unmet need and the built-in surplus) and if necessary delayed to enable the District to take advantage of the new OAN regime.

It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.

It is unsound not to spell out a density target. We will not get cheaper houses just by planning for ever higher numbers builders will never build. The only way is to specify higher build densities which would automatically mean smaller and less expensive houses. We have enough low density high cost houses already; let us use the Plan to add high density low cost houses to the mix. We recommend that a fixed target density of 60 houses to the hectare, higher in towns, be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through CIL, for exceeding.

(Continue on page 4 /expand box if necessary)

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For the plan to be sound it would have to be demonstrated that the Oxford unmet need was a robust and credible figure. We submit that there is no evidence to support it.

There is similarly no evidence provided for the 1,988 houses that are above the housing requirement for the full Plan period. Allocations relating to these figures should be removed from the Plan.

The Oxfordshire SHMA figures are now completely discredited as a reliable source on which to base decision-making and should be re-visited.

A fixed target density of 60 houses to the hectare, higher in towns, should be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through Community Infrastructure Levy, for exceeding.

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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We believe that CPRE has a useful understanding of these broader housing and cross-District issues and could contribute meaningfully to this discussion.

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Policies Map

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Proposed allocation (600 houses) East of Kingston Bagpuize with Southmoor (Fyfield and Tubney Parish)

This site is acknowledged in the Plan text (Appendix A) as an ‘urban development’ and would form an inappropriate dormitory suburb to Kingston Bagpuize with Southmoor, which is already facing transformational change in light of 85% growth.

It would also encroach to within a few hundred yards of Fyfield village and yet fails to address the relevant issues of heritage and environment, including impacts on the conservation areas and Grade II* listed buildings in Fyfield and Netherton.

The site has no local employment growth within five miles. There is massive traffic congestion at peak hours. It is described as having good transport links helping to minimise car use, despite having been red-flagged by the Oxfordshire Growth Board because of the inadequacy of its transport infrastructure.

CPRE Oxfordshire supports the evidence provided by Fyfield and Tubney Parish Council and Fyfield Local Action Group that the A420 is already running at or near capacity, without taking into account the significant development coming through as a result of Local Plan Part 1. Oxfordshire County Council has identified the A420/A415 roundabout as already exceeding its capacity bounds and the additional roundabout will cause an added bottleneck.

(Continue on page 4 /expand box if necessary)

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

Removal of the Fyfield site from the allocations in Policy 4a and from Policy 8a.

(Continue on page 4 /expand box if necessary)

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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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We anticipate that discussion on this site will cover a broad range of issues with which CPRE would wish to engage, including transport, heritage and environment.

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

Signature:

Date:

Sharing your personal details

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Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
8b

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

No

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

NO

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

1. NOT LEGALLY PROCEDURALLY COMPLIANT

The Policy is not legally procedurally compliant. It is unclear what is proposed. The plan at Fig.3 in the Plan Review differs from the plan at page 13 of the appendices. In the first the red outline is “proposed strategic allocation” and in the second “proposed housing allocation”. The confusion is compounded by the wording on Page 37 of the Plan Review (copied at the end of this section) which says both that the site will be wholly removed from the Green Belt and that a large part of the site will be left in it. It continues that the land remaining in the Green Belt will be limited to “Green Belt compatible development” which, since if it were to be truly in the Green Belt the comment would be superfluous, again increases uncertainty.

What is intended must be clarified beyond equivocation for the Plan to be sound. It is noted that these anomalies have been brought to the Council’s attention in previous consultations.

Para 3 page 37. The Site is removed from the Oxford Green Belt in accordance with Core Policy 13a. The site area however contains a large area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt compatible development. The area will contain a substantial Country Park located on the Western part of the site that should be planned for as part of the comprehensive development framework.

2. NO DUTY TO CO-OPERATE

The Policy is not compliant with the duty to co-operate and neither is the whole Submission Plan since no duty to co-operate to provide for Oxford's unmet need can exist until Oxford itself has defined that need. Not only has it not done so but it has resisted all entreaties to do so, and the draft Oxford Local Plan defines neither the unmet need nor Oxford's ability to meet it, should any exist.

CPRE has provided evidence to that Local Plan consultation that the City is capable of providing all of its need as determined by the SHMA, and more than twice its need as it would be determined under the Government's new OAN formula, now under consultation.

Consequently, there can be no requirement, obligation or duty to satisfy Oxford's unmet need and the Vale Plan Review is in that way neither compliant with the duty to co-operate, nor necessary.

3. NOT IN ACCORDANCE WITH THE NPPF.

The Policy is not in accordance with the NPPF in that there is no necessity to release any of the land from the Green Belt to accommodate the level of housing proposed, and consequently no exceptional circumstances exist for release of Green Belt land. It is noted that the Inspector dismissed a series of Green Belt releases which were not required for housing in Part 1.

Paragraph 89 allows for the redevelopment of previously developed sites within the Green Belt, providing the impact on openness is not (disproportionately) greater.

The Dalton Policy is silent on density of development proposed, although it does refer to "*mixed tenure homes and housing types that are genuinely affordable*". Whilst there is no current Government numerical advice on densities, the Housing White Paper of March 2017 states that it is necessary to ***make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements.*** (Our emphasis).

PPG3 required that *Local planning authorities should avoid the inefficient use of land and encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors.* (Dalton is close to the A34 and to Abingdon).

It is CPRE's view that higher densities should be targeted to reduce land-take, provide the "genuinely affordable" housing the Vale seeks, and to balance the housing stock. Presently desirable Victorian Terraces were typically built at densities of 75 to the hectare. A green village concept can be achieved without a waste of space, or the provision of unnecessarily expensive houses.

However, even taking the mid-case of PPG3 would mean 40 dwellings to the hectare, say 5,200 within the Council's shaded area in Figure 2.3, or 4,560 within the smaller area CPRE considers to be truly "previously developed".

Arguably, given the Council's own stated position, that the requirement is for *housing types that are genuinely affordable*, densities at the higher end of the PPG3 scale, or even at

Victorian terrace levels should be aimed for, meaning the capacity of the shaded “previously developed” part of the site would be 7,800 houses or higher.

In any event, since the previously developed part of the site is several multiples greater than the houses intended to be built, there can be no justification for its removal from the Green Belt, as the development would be appropriate within the Green Belt under paragraph 89. It may be relevant that this does not appear to be considered in the Plan.

It can only be that the intention is to remove a large area of Green Belt in case a need for it later emerges, which is exactly the basis on which the reviews proposed in Part 1 were dismissed by the Inspector.

Further, releasing that area or allowing development of the shaded area to “sprawl” out over it would be totally inappropriate as it would risk merging Abingdon, Wootton, Dry Sandford and Shippon, threatening the gap to Marcham, as well as encroaching upon open countryside, contrary to the key purposes of designating land as Green Belt, with no justification.

4. NO EXCEPTIONAL CIRCUMSTANCES

Exceptional circumstances are irrelevant to this case as the proposed housing could be accommodated without releasing land from the Green Belt.

For the record, the exceptional circumstances proposed at 2.75 are:

- a. *That the land has become unexpectedly available.* To consider that the unexpected equates to the exceptional, would be to drive a cart and horses through Green Belt protection.
- b. *The Green Belt study.* The Green Belt study is not an exceptional circumstance. Even if it were not fatally flawed, one piece of land cannot be released because it is subjectively less valuable than another piece, as clearly this process would result in only one piece being left. At most the Study could inform a decision to release if there were genuine exceptional circumstances.
- c. *The site is close to Oxford.* Proximity to Oxford is not an exceptional circumstance and in any case the site is ten miles from the City. Oxfordshire is a single housing market area, and there is no more merit in provision within the Green Belt that surrounds the City than beyond it.
- d. *The site contains a large area of brownfield.* This is not an exceptional circumstance to release it from the Green Belt. On the contrary, it reinforces the point that the proposed housing can be built within it without affecting its Green Belt status.

(Continue on page 4 /expand box if necessary)

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

For the plan to be sound it would have to be demonstrated first that the Oxford unmet need was a robust and credible figure. We submit there is no evidence to support it.

It would secondly have to be demonstrated that the proposed 1,200 houses could not be built within the previously developed area of the site despite our demonstration that it could accommodate several times that number, or, should there be any shortfall that it could not be accommodated elsewhere in the District outside the Green Belt or, under the duty to co-operate, elsewhere, before Green Belt release could be considered. It should then cover only the area required for the deficit in housing.

In the absence of this evidence the intention to release the site from the Green Belt should be struck out, any housing should be limited to the capacity of the previously developed area and Policy 8b should be amended accordingly.

(Continue on page 4 /expand box if necessary)

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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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is expected that the matters we contest will be the subject of argument across the floor at the EIP in which we believe it would aid the Inspector for us to participate.

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

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

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Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

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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.

Title	Mrs	
First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	First Floor	
Address Line 2	20 High Street	
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

2. Agent's Details (if applicable)

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
12a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

No

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

NO

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Park & Rides

CPRE believes the remote Park & Ride strategy is fundamentally flawed. If Park & Rides must exist, they should from preference be located as close as possible to the areas from where people are travelling. The worst option is to locate them in rural sites between major settlements, which does nothing to reduce the number of car journeys but shifts congestion to rural roads and villages with inadequate supporting infrastructure, as well as impacting on the local landscape.

Lodge Hill

CPRE further notes that the OCC LTP4 Connecting Oxfordshire Park and Ride Strategy pre-dated the MoD Estates Review which identified Dalton Barracks for disposal. Following the Vale decision to include this site within LPP2, we would have expected the Vale to work with OCC to review the strategy, however flawed, on the A34 corridor. Whilst CPRE opposes Green Belt sites for any Park and Rides, co-location of dwellings and sustainable forms of travel is clearly not just desirable but essential. CPRE has sympathy with many local residents who see the Marcham/A34 interchange site as greatly superior to Lodge Hill due to its proximity to the Dalton Barracks site, where its presence would create the best sustainability outcomes for the greatest number of potential users.

Sited at the A34/A415 (Marcham) Junction, where it still intercepts northbound A34 traffic, the Park & Ride could be a transport hub for South bound journeys to Milton Park and Harwell, East to Abingdon and North to Oxford. Central and North Abingdon are already

well served by the premium X3 bus service, so movement of the Park and Ride to Marcham would not be detrimental overall, while if the Park & Ride were located at Lodge Hill, it would damage the viability of the X2, X3 and X13 bus services. It could also threaten the viability of the 4/4B service routing via the Wootton road, even though this is by far the most effective way to create a sustainable housing development.

Cumnor

The Cumnor Park & Ride is also not based on appropriate evidence and cannot be justified. The County Council's own strategic report stated that it would only attract 763 cars per day, and yet the proposal is for a Park & Ride with 1,200 spaces for cars. This is not a commercially viable proposition and seeking to support it via retail outlets is incompatible with Green Belt protections.

Provision for a public transport and cycle link between Dalton Barracks and the proposed Lodge Hill Park and Ride site

It is staggering that this policy, which has such significant potential impacts on the Green Belt and local communities, appears to have been included as a result of a last-minute decision by the District Council, without any consultation with those affected communities or even Oxfordshire County Council! It also indicates that there has been a failure in the Duty to Co-operate.

A 'bus and cycle link' appears to us to be a euphemism for a new road. No funding is identified to bring this forward. If funding were found, it seems inconceivable that a new road would be built and then restricted to buses only. This should therefore be openly presented and discussed for what it really is - a new road across the Green Belt with a significant potential impact on existing rural communities such as Sunningwell.

We note that the route cuts across land parcels identified as having 'high landscape sensitivity and high visibility and neither is suitable for development in landscape and visual terms'. The report by Hankinson Duckett Associates continues to say that both routes make 'a high contribution to at least one of the Green Belt Purposes. None of the Parcels are suitable for development in landscape and visual terms and development within any of these Parcels would harm the openness and integrity of the Green Belt.' (Green Belt Study Vale LP2, Hankinson Duckett Associates, Oct 17)

The policy is not justified as no evidence is provided of any examination of the viability of alternative options such as enhancement to existing service bus provision (such as the 4/4B), routing dedicated 'hopper' buses via the existing road network, or the safeguarding of alternative routes (for example, providing a segregated cycleway provision along the Wootton Road).

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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 Park & Ride sites at Cumnor and Lodge Hill should be removed from the Plan.

CPRE seeks further reassessment of the location of *any* A34 South Corridor Park and Ride site. The subsequent allocation of a major site for up to 4,000 dwellings at Dalton Barracks and the soon to be identified route corridor for the Oxford to Cambridge Expressway require that the OCC Local Transport plan be re-examined to determine if the previous intentions are still fit for purpose.

The safeguarding of land for bus and cycleways as shown in Figure 4.2 should be removed from the Plan.

(Continue on page 4 /expand box if necessary)

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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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

CPRE has a long-standing concern with the issues of Green Belt protection and (public) transport, and would very much wish the opportunity to contribute to this discussion.

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

Signature:

Date:

Sharing your personal details

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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.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing

(where relevant)
Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
13a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

No

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

NO

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

1. NOT LEGALLY PROCEDURALLY COMPLIANT

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What is intended must be clarified beyond equivocation for the Plan to be sound. It is noted that these anomalies have been brought to the Council’s attention in previous consultations.

Para 3 page 37. The Site is removed from the Oxford Green Belt in accordance with Core Policy 13a. The site area however contains a large area of land that will remain within the Oxford Green Belt and any development on this area will be limited to Green Belt compatible development. The area will contain a substantial Country Park located on the Western part of the site that should be planned for as part of the comprehensive development framework.

2. NO DUTY TO CO-OPERATE

The Policy is not compliant with the duty to co-operate and neither is the whole Submission Plan since no duty to co-operate to provide for Oxford's unmet need can exist until Oxford itself has defined that need. Not only has it not done so but it has resisted all entreaties to do so, and the draft Oxford Local Plan defines neither the unmet need nor Oxford's ability to meet it, should any exist.

CPRE has provided evidence to that Local Plan consultation that the City is capable of providing all of its need as determined by the SHMA, and more than twice its need as it would be determined under the Government's new OAN formula now under consultation.

Consequently, there can be no requirement, obligation or duty to satisfy Oxford's unmet need and the Vale Plan Review is in that way neither compliant with the duty to co-operate nor necessary.

3. NOT IN ACCORDANCE WITH THE NPPF.

The Policy is not in accordance with the NPPF in that there is no necessity to release any of the land from the Green Belt to accommodate the level of housing proposed, and consequently no exceptional circumstances exist for release of Green Belt land. It is noted that the Inspector dismissed a series of Green Belt releases which were not required for housing in Part 1.

Paragraph 89 allows for the redevelopment of previously developed sites within the Green Belt, providing the impact on openness is not (disproportionately) greater.

The Dalton Policy is silent on density of development proposed, although it does refer to "*mixed tenure homes and housing types that are genuinely affordable*". Whilst there is no current Government numerical advice on densities, the Housing White Paper of March 2017 states that it is necessary to ***make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements.*** (Our emphasis).

PPG3 required that *Local planning authorities should avoid the inefficient use of land and encouraged housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors.* (Dalton is close to the A34 and to Abingdon).

It is CPRE's view that higher densities should be targeted to reduce land-take, provide the "genuinely affordable" housing the Vale seeks, and to balance the housing stock. Presently desirable Victorian Terraces were typically built at densities of 75 to the hectare. A green village concept can be achieved without a waste of space, or the provision of unnecessarily expensive houses.

However, even taking the mid-case of PPG3 would mean 40 dwellings to the hectare, say 5,200 within the Council's shaded area in Figure 2.3, or 4,560 within the smaller area CPRE considers to be truly "previously developed".

Arguably, given the Council's own stated position, that the requirement is for *housing types that are genuinely affordable*, densities at the higher end of the PPG3 scale, or even at

Victorian terrace levels should be aimed for, meaning the capacity of the shaded “previously developed” part of the site would be 7,800 houses or higher.

In any event, since the previously developed part of the site is several multiples greater than the houses intended to be built there can be no justification for its removal from the Green Belt, as the development would be appropriate within the Green Belt under paragraph 89. It may be relevant that this does not appear to be considered in the Plan.

It can only be that the intention is to remove a large area of Green Belt in case a need for it later emerges, which is exactly the basis on which the reviews proposed in Part 1 were dismissed by the Inspector.

Further, releasing that area or allowing development of the shaded area to “sprawl” out over it would be totally inappropriate as it would risk merging Abingdon, Wootton, Dry Sandford and Shippon, threatening the gap to Marcham, as well as encroaching upon open countryside, contrary to the key purposes of designating land as Green Belt, with no justification.

4. NO EXCEPTIONAL CIRCUMSTANCES

Exceptional circumstances are irrelevant to this case as the proposed housing could be accommodated without releasing land from the Green Belt.

For the record, the exceptional circumstances proposed at 2.75 are:

- a. *That the land has become unexpectedly available.* To consider that the unexpected equates to the exceptional would be to drive a cart and horses through Green Belt protection.
- b. *The Green Belt study.* The Green Belt study is not an exceptional circumstance. Even if it were not fatally flawed, one piece of land cannot be released because it is subjectively less valuable than another piece as clearly this process would result in only one piece being left. At most the Study could inform a decision to release if there were genuine exceptional circumstances.
- c. *The site is close to Oxford.* Proximity to Oxford is not an exceptional circumstance and in any case the site is ten miles from the City. Oxfordshire is a single housing market area, and there is no more merit in provision within the Green Belt that surrounds the City than beyond it.
- d. *The site contains a large area of brownfield.* This is not an exceptional circumstance to release it from the Green Belt. On the contrary it reinforces the point that the proposed housing can be built within it without affecting its Green Belt status.

(Continue on page 4 /expand box if necessary)

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

For the plan to be sound it would have to be demonstrated first that the Oxford unmet need was a robust and credible figure. We submit there is no evidence to support it.

It would secondly have to be demonstrated that the proposed 1,200 houses could not be built within the previously developed area of the site despite our demonstration that it could accommodate several times that number, or, should there be any shortfall that it could not be accommodated elsewhere in the District outside the Green Belt or, under the duty to co-operate, elsewhere, before Green Belt release could be considered. It should then cover only the area required for the deficit in housing.

In the absence of this evidence the intention to release the site from the Green Belt should be struck out and any housing should be limited to the capacity of the previously developed area. Policy 13a should be deleted and Policy 8b amended accordingly.

(Continue on page 4 /expand box if necessary)

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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is expected that the matters we contest will be the subject of argument across the floor at the EIP in which we believe it would aid the Inspector for us to participate.

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

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of

the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

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Please do not contact me again

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Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	Helen	
Last Name	Marshal	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
14a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

CPRE Oxfordshire supports the comments made by the North Wessex Downs Area of Outstanding Natural Beauty in response to the previous Local Plan Part 2 Preferred Options Consultation. This drew attention to the fact that there has been a failure to take proper account of the likely impact of this major development on the AONB and its setting. In view of the likely harm to the AONB, we would contend that this policy is not sound.

(Continue on page 4 /expand box if necessary)

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

Alteration of Core Policy 14a to remove, or as a minimum substantially reduce, the area of land previously safeguarded in Core Policy 14.

(Continue on page 4 /expand box if necessary)

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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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

CPRE has been involved in the discussions about the Upper Thames Reservoir over a substantial period of time and we believe we could make a useful contribution to this issue.

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

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

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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	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	First Floor	
Address Line 2	20 High Street	
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy

15a & b

Policies Map

And Sustainability Appraisal

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

**Core Policy 15a: Additional Site Allocations for South-East Vale Sub-Area
Core Policy 15b: Harwell Campus Comprehensive Development Framework
& Sustainability Appraisal**

CPRE Oxfordshire is particularly concerned about the proposed housing allocation on the Harwell Campus of 1,000 new dwellings within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), and the harm that will be done to the AONB.

We welcomed the Inspector’s decision in his examination of Local Plan Part 1 that the two major housing development sites adjacent to Harwell Campus and within the AONB (850 houses ‘East of Harwell Campus’ and 550 ‘North West of Harwell Campus’) were unsound and recommended for deletion from the Plan.

The Inspector was very clear in his report on his rationale for this recommendation. These are set out under ‘Issue 5 – whether or not the plan sets out a soundly-based strategy for the South-East Vale Sub-Area, including whether or not the housing allocations proposed in the North Wessex Downs AONB are soundly-based.’

In particular, the Inspector notes that the housing allocations, totalling 1,400 new dwellings within the AONB ‘*would be a major development which the NPPF indicates should be refused in an AONB other than in exceptional circumstances and where it can be demonstrated it is in the public interest.*’ (Para. 112)

Paragraph 116 of the NPPF states:

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. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

Concluding his assessment, the Inspector notes ‘*In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers.*’

And concerning planning applications that would have to come forward for such developments, the Inspector notes ‘*I consider it unlikely that the exceptional circumstances necessary to approve such an application would reasonably be considered to exist. Consequently, the plan’s housing allocations on sites 12 and 13 are not soundly-based.*’ (Para. 121)

Yet, despite the Inspector’s decision, the Vale nevertheless proposes in Local Plan Part 2 the allocation of 1,000 new dwellings within the AONB on the Harwell Campus.

The proposed site straddles the Icknield Way – the central section of an ancient route with a claim to be the ‘oldest road in Britain’.

IF the proposed housing development is approved, the development MUST take into account the importance of the Icknield Way as an historic route and it should be protected from any damaging impact caused by the proposed development.

The proposed site is in part (approx. two thirds) on land confirmed in the adopted Local Plan Part 1 as allocated for development as employment land (this includes a large area of open greenfield land in the north-west corner of the site).

The site is also in part (the balance of the site, north of the Icknield Way) on land proposed as part of a strategic housing allocation site in Local Plan Part 1 for new housing (550 dwellings ‘North of Harwell Campus’), which was deleted by the Inspector as unsound due to the harm that would result on the AONB, and that it was contrary to the statutory objectives of the AONB and provisions in the National Planning Policy Framework (NPPF).

The Vale says ‘*It has been demonstrated that the proposed residential development at Harwell Campus would have limited impact on the landscape setting of the AONB and those limited impacts that have been identified are capable of being successfully mitigated.*’ (Para. 2.116).

This claim is based on the report by Hankinson Duckett Associates, summarised in the ‘Harwell Campus “Exceptional Circumstances” Report to the Vale of White Horse District Council’:

However, in the HDA's Landscape and Visual Appraisal, they conclude:

'Development of the proposed housing allocation would have some initial adverse effects, notably on the character of the land within the site to the north, land located to the immediate north of the site and from four public footpaths which have existing views of the site.'

It goes on to say: 'There would be initial adverse effects on the recreational experiences of people using the Icknield Way, Hungerford Road and Winaway.'

According to the HDA report, these 'adverse effects' would not be mitigated for some 10-15 years!

Commenting on the proposed development of housing within the northern part of the Campus, the Inspector notes in his report that while *'the development of housing within the northern part of the Harwell Campus' ... 'would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously-developed land'*, he went on to say *'However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus.'*

This is significant in light of the Vale's own recognition that *'it is ... crucial that employment development on the Enterprise Zone continues to be supported.'* (Para. 2.112). The proposed housing allocation is on land that is designated for employment use through Local Plan 2011 Saved Policy E7 and Core Policy 6.

The Inspector concluded *'Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist.'* (Para. 122). (Our emphasis).

To summarise, we can see no clear evidence that the specific issues raised by the Inspector in his rejection of the proposed housing developments within the AONB have been addressed in Local Plan Part 2.

We do not believe the need for development of this site for housing has been demonstrated and we consider that it would be likely to cause harm to the landscape of the AONB and the recreational opportunities it offers.

We understand that one of the 'main issues' that arose from the Preferred Options (Regulation 18) consultation included *'concern ... that there was a lack of evidence published to demonstrate the exceptional circumstances to justify development at Harwell Campus, located in the AONB.'*

As far as CPRE is concerned, there *continues* to be a lack of evidence published to demonstrate the exceptional circumstances to justify development on the Harwell Campus in the AONB, and as such, we are unclear why the Vale Council has chosen to retain the proposed site allocation of 1,000 houses at Harwell Campus in the Publication Version of its Local Plan.

There is no clear justification that the number of new dwellings and its location within the Harwell Campus is sufficiently important to meet the NPPF tests (in particular,

exceptional circumstances and public interest) to overcome the national planning policy requirement that major developments should not be permitted within the AONB.

Moreover, we are worried that if the proposed site allocation were to be approved, it would set a dangerous precedent for further ‘major developments’, not just within the North Wessex Downs AONB, but in other AONBs.

New independent research by National CPRE ‘Beauty Betrayed’ (November 2017), shows that there has been an 82% increase in new housing units given planning permission in England’s 34 AONBs in the past five years, despite the fact that national planning policy gives them ‘the highest status of protection’ from damaging development. This is a five-fold increase since 2012 in the amount of AONB land set to be lost to development.

The North Wessex Downs is one of just eight AONBs which account for 74% of all housing applications in AONBs and 79% of all approvals in AONBs from 2012-2017.

IF the proposed allocation is approved, it would become the largest housing development within an AONB nationally (currently, the largest housing development approved in an AONB is at Peace Pottage, High Weald AONB, for 600 houses).

In conclusion, we consider the proposed new site allocation within the AONB would be harmful to the AONB objectives, would not constitute sustainable development and would not meet the statutory provisions and national policy measures designed to safeguard the special qualities of the AONB.

New Policy relating to North Wessex Downs Area of Outstanding Natural Beauty

Given that a considerable percentage of the Vale of White Horse District lies within the North Wessex Downs Area of Outstanding Natural Beauty, CPRE believes that the current Plan cannot be considered sound unless it includes a policy addressing the specific development requirements of this designation.

CPRE proposes the following wording to replace NE6 relating to the North Wessex Downs Area of Outstanding Natural Beauty:

‘In determining development proposals within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and proposals which would affect its setting, great weight will be given to conserving and enhancing the area’s natural beauty, landscape and countryside, including its wildlife, historic character and heritage assets. The North Wessex Downs AONB Management Plan and guidance documents are material considerations in decision making relevant to the AONB.

Major development will not be permitted within the AONB unless it satisfies the exceptional circumstances set out in national policy and guidance.

Proposals that support the economy and social well-being of communities located in the North Wessex Downs AONB, including affordable housing schemes and small scale renewable energy development, will be supported, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area.’

(See: CPRE’s submission re: Chapter 3 – Development Management Policies).

Sustainability Appraisal

The SEA Regulations, which underpin the Sustainability Appraisal process, indicate that stand-alone consideration should be given to ‘cumulative effects’, ie, effects of LPP2 in combination with other plans. (Para. 11.1.2).

However, CPRE is concerned that the Sustainability Appraisal gives short shrift to the ‘cumulative effects’ of LPP2 and LPP1 allocations, as well as other local plans in the sub-region, on the North Wessex Downs AONB.

The Sustainability Appraisal is supposed to consider the ‘*In-combination impacts at the ‘larger than local’ scale of the North Wessex Downs Area of Outstanding Natural Beauty (AONB).*’ (Para 11.1.6).

But instead of giving due ‘consideration’ to the in-combination impacts at the larger than local scale of the NWD AONB, the Vale seems to have thrown its hands up in the air, saying ‘it is difficult to envisage in-combination effects’. (Para 11.1.6).

Moreover it says ‘*it is understood that other local plans (the AONB straddles three unitary authorities and four district councils) are giving consideration to options involving major development in the AONB.*’

This seems to imply because there are other local plans ‘giving consideration to options involving major development’ elsewhere in the NWD AONB, this justifies the Vale’s proposed development on the Harwell Campus in the NWD AONB.

The CPRE report (mentioned above), reveals the extent to which AONBs across the country are facing housing development pressures despite their ‘protected’ status. Of the eight AONBs under most pressure, three are in Oxfordshire, including the North Wessex Downs.

In the last five years, approval has been given to 100 new homes on greenfield land in Hungerford, Berkshire, in the North Wessex Downs, despite no ‘exceptional circumstances’ having been demonstrated. Similarly, in Marlborough, Wiltshire, in the North Wessex Downs, approval was given for 167 homes and a hotel on greenfield land, despite landscape impact.

The CPRE report highlights how important it is for Councils such as the Vale to give due consideration to the ‘in-combination’ impacts of proposed developments at the larger than local scale of the NWD AONB.

We strongly recommend, in unison with the North Wessex Downs Unit, that there should be a strategic approach to potential impacts on the North Wessex Downs AONB. As such, the SA should include ‘*an estimate of the overarching cumulative impact of proposed site allocations on the AONB objectives, and taking account of developments in adjacent areas, such as the wider Didcot area.*’ (NWD Unit submission to LPP2 Preferred Options).

As the NWD Unit says ‘*This, we believe, would be fully in line with the iterative nature of the SA process. It would provide a helpful indication of the scale and direction of the overall effects on the AONB and its setting of implementing the Vale of White Horse Local Plan 2031, having due regard for those of developments in neighbouring areas. This, we believe, would inform and contribute to an examination of the soundness of the Plan.*’ (NWD Unit submission to LPP2 Preferred Options).

(Continue on page 4 /expand box if necessary)

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We believe the allocation of 1,000 new dwellings on the Harwell Campus within the North Wessex Downs Area of Outstanding Natural Beauty to be unsound and recommend its deletion from the Plan.

(Continue on page 4 /expand box if necessary)

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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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

CPRE represents the views of its members across the District, is well-informed on the issues and would wish to contribute to any related discussion.

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

Signature:

Date:

Sharing your personal details

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1. Personal Details*

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2. Agent's Details (if applicable)

Title	Mrs	
First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	Campaign to Protect Rural England, Oxfordshire	
Address Line 1	First Floor	
Address Line 2	20 High Street	
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
15a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

North-West of Grove

The Local Plan Part 1 (LPP1) focused on housing and economic growth within the South-East Vale Sub-Area and identified strategic housing at Wantage and Grove, amounting to some 4,885 dwellings on sites 14, 15 and H5.

In the Inspector's report he notes that *'by any measure [this] would represent a significant expansion of these settlements.'* (Para. 132), and that *'Inevitably the character of both Wantage and Grove will change to some degree, but this is not to say that it would be harmed.'* (Para. 134).

Despite the Inspector's acknowledgement that Wantage and Grove had borne the brunt of a large percentage of the total housing allocated in the South-East Vale Sub-Area, the Part 2 Plan includes an *additional* site allocation at 'the local service centre of Grove' for 400 dwellings (initially 300 at the Preferred Options stage, but revised upwards to 400 in the Publicity Version).

The removal from the Part 1 Plan of two sites proposed on land adjoining Harwell Campus within the North Wessex Downs Area of Outstanding Natural Beauty, reduced the planned housing supply in the Science Vale by 1,400 dwellings. The 400 houses allocated to North-West Grove in Part 2 of the Plan is intended as part replacement of these sites.

The Council justifies this replacement on the grounds that it will ‘provide additional housing supply’ (para.2.96). Yet the Inspector clearly acknowledges in his report that strategic housing at Wantage and Grove in Part 1 of the Plan has already been substantial, amounting as he says to a ‘significant expansion’ of Wantage and Grove. We are unclear therefore what evidence exists that suggests ‘additional housing supply’ is needed in Grove. If an additional 400 houses were needed in Grove, surely these should have been allocated in Part 1 of the Plan?

CPRE sees no reason for *any* additional housing to be added in the South-East Vale Sub-Area by the Part 2 Plan. The Part 1 Plan has provided enough land for the proposed government housing target for the whole Vale District (2014 SHMA), *plus* an updated allowance for overspill from Oxford. (See CPRE's response to CP 4a).

The rationale included in the Plan Part 2 suggests that the Council is also allocating additional housing at North-West Grove to support the Council’s objective to support the Science Vale area.

The Science Vale growth was adequately covered in the 2014 SHMA and the figures in the Local Plan Part 1 therefore include the growth of the Science Vale.

The addition of 400 homes at North-West Grove is therefore not in accordance with the ‘spatial strategy’ set out in the Part 1 Plan, which makes provision for growth of around 23,000 new jobs, 218 hectares of employment land, and at least 20,560 new homes, to be delivered during the plan period from 2011 to 2031.

The Council goes on to say that additional housing is required to: ‘*help to achieve and maintain a sustainable balance of housing and employment within the Science Vale area by ensuring that housing is located close to the provision of new jobs and is accessible by sustainable modes of travel.*’ (Para.2.96).

Yet Grove is *not* located close to the provision of new jobs – it is some 8.2 miles from Milton Park, 8.4 miles from Harwell Campus and 12.6 miles from Culham Science Centre - unless it is envisaged that the Grove Business Park will provide jobs for all the new residents of Grove. In his report, the Inspector acknowledges ‘It is the case that Wantage and Grove are some distance from the envisaged employment growth at Harwell Campus.’ (Para. 132).

Nor is Grove currently ‘accessible by sustainable modes of travel’. As the Inspector quite rightly notes ‘significant public transport improvements are *envisaged*’ (para. 132) (our emphasis) – however,, they are not yet in place and as such, no additional homes should be allocated to the area until these improvements have materialised.

The Vale says ‘*It is important that the new development planned for Wantage and Grove delivers infrastructure (such as new services, facilities and roads) alongside the delivery of new housing.*’ (Para. 2.99). (Our emphasis).

Yet housing is being delivered in Wantage and Grove at a rate that is far outstripping the delivery of planned infrastructure. If the planned infrastructure for site allocations in Part 1 of the Plan are not being delivered on time, it begs the question how the infrastructure for the additional site allocation in Grove will be delivered on time.

Curiously, the Vale says ‘*To assist with infrastructure delivery in this area [Wantage and Grove], an additional development site is allocated in the Part 2 plan at North-West Grove on land between the Monks Farm and Grove Airfield sites.*’ (Para. 2.99).

It is unclear how a new housing development (ie 400 dwellings at North-West Grove) could ‘assist with infrastructure delivery in this area’. If the Council is failing to deliver the required infrastructure for the new housing already delivered in the area, surely the provision of *more* houses would put even greater infrastructure pressures on Wantage and Grove.

The Vale clarifies what it actually means in para. 2.100 ‘The allocation of the North-West of Grove Site will assist with delivering the North Grove Link Road (NGLR) that will form an important connection between Grove Airfield and the A338, along with contributing to a range of other services and facilities.’

However, it is unclear how the allocation of an additional 400 dwellings at Grove could ‘assist with delivering’ the NGLR. Surely the income generated for the Council from 400 dwellings would be a drop in the ocean – it is much more likely that the income generated for the Council from the 4,885 dwellings on sites 14, 15 and H5, as envisaged in Part 1 of the Plan, will ‘assist with delivering’ the Link Road.

The delivery of the Link Road is therefore not dependent on the allocation of an additional 400 homes at North-West Grove.

The Vale is also strangely silent on the ‘services and facilities’ the income generated from the additional 400 dwellings at North-West Grove would provide. What would these services and facilities consist of and where would they be located? If the provision of these ‘services and facilities’ is a justification of the additional site allocation at North-West Grove, then the Vale needs to establish the need for these services and facilities, so the evidence can be properly evaluated.

The Vale’s admission that the housing development on the North-West Grove site ‘*will not come forward until towards the end of the plan period and much closer to 2031*’ (para. 2.100) suggests to us that the 400 houses are not *needed* in Grove, are not *needed* in the Science Vale area, and moreover, are not *needed* within the Plan period.

(Continue on page 4 /expand box if necessary)

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

For the reasons cited above, it is our understanding that the additional site allocation of 400 dwellings at North-West Grove is unsound and we recommend the deletion of Core Policy 15a from the Plan

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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Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

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Sharing your personal details

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First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
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Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
19a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

YES

4. (2) Sound

YES

4. (3) Complies with the Duty to Cooperate

YES

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

CPRE welcomes the safeguarding of land (on both sides of the A338 north on and around the site of the former Wantage Road Station) for the re-opening of the railway station to serve Wantage and Grove (CP19a), providing the possibility for local people to travel to Oxford and Swindon and beyond for work, training and leisure.

We note that there is as yet no commitment from Network Rail for any works to open the station and hope that this can be brought forward as an urgent matter.

(Continue on page 4 /expand box if necessary)

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Last Name	Marshall	
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Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy

Policies Map

Development Policy 21

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

4. (2) Sound

NO

No

4. (3) Complies with the Duty to Cooperate

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Development Policy 21 – External Lighting

Whilst we have no issue with the wording as such, we feel that it (and the Plan as a whole) misses a vital opportunity to include a robust Dark Skies policy that currently leaves the Plan unsound.

The NPPF does NOT restrict policy on light pollution merely to controlling or minimising additional light pollution arising from new development, but requires local authorities to adopt a more proactive position to replace poor design and enhance (not just conserve) the environment, including intrinsically dark landscapes and wildlife, not just people's local amenity.

As a policy objective "Dark Skies" is the positive counterpart of tackling light pollution and includes not only preventing additional new intrusion but also seeking to remedy existing problems. It would be particularly of relevance in relation to maintaining and enhancing the tranquillity of the North Wessex Downs Area of Outstanding Natural Beauty.

It may be helpful to refer to CPRE's report *Night Blight* which has revealed more about the nature of problem caused by light pollution, and has also highlighted ways in which it can not only be contained but actively reduced.

(See: https://nightblight.cpre.org.uk/images/resources/Night_Blight_cpre.pdf).

(Continue on page 4 /expand box if necessary)

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The key recommendations of CPRE's nationwide study on Dark Skies *Shedding Light* (2014) should be considered:

- Policies to control light pollution should include identifying existing dark areas that need protecting.
- A strong presumption against new lighting in existing dark areas, unless essential as part of a new development or for public safety reasons that have been clearly demonstrated.
- Street lighting policy to include Environmental Lighting Zones to ensure that the appropriate lighting levels with very strict requirements applying in identified dark areas.
- Adoption of part-night lighting schemes (e.g. switching off between midnight and 5am) or dimming.
- Careful consideration (in conjunction with Highways authorities) to the type of Light Emitting Diodes (LED) lighting allowed and the potential impacts that higher temperature blue rich lighting has on ecology and on human health.
- Targets (in conjunction with Highways authorities) for replacing all their street and road lights with less light polluting types.
- Testing in situ of any new street lighting before being rolled out across a wider area.
- Adopt monitoring procedures that include collaboration with the Institution of Lighting Professionals/LANTERNS research project which aims to quantify any effects of changes to street lighting on road traffic accidents and crime.

(Continue on page 4 /expand box if necessary)

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YES

Yes, I wish to participate at the oral examination

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2. Agent's Details (if applicable)

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First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy

Policies Map

DP29

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

YES

4. (2) Sound

NO

4. (3) Complies with the Duty to Cooperate YES

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Development Policy 29: Settlement Character & Gaps

CPRE notes and supports the concerns raised by the Wantage & Grove Campaign Group that there is no definition of the “physical and visual separation” of settlements, which may leave this policy open to challenge.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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 policy should be re-worded to define the “physical and visual separation” of settlements or include the wording from Saved Policy NE10 (which this policy is intended to replace) which refers to:

“In the urban fringes and important open gaps between settlements, as shown on the

proposals map, development or changes of use which would harm their essentially open or rural character will not be permitted.”

(Continue on page 4 /expand box if necessary)

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Yes,

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

CPRE Oxfordshire represents the views of its members across the District and has a long record of engagement on issues of coalescence and settlement gaps. We would very much wish to be part of any discussion on this matter.

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

Signature:

Date:

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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.

Title

Mrs

First Name

Helen

Last Name

Marshall

Job Title (where relevant)

Director

Organisation representing
(where relevant)

CPRE Oxfordshire

Address Line 1

First Floor

Address Line 2

20 High Street

Address Line 3

Postal Town

Watlington

Post Code

OX49 5PY

Telephone Number

01491 612079

Email Address

director@cpreoxon.org.uk

2. Agent's Details (if applicable)

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph
3.263

Policy
& DP31

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

YES

4. (2) Sound

NO

4. (3) Complies with the Duty to Cooperate

YES

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

CPRE Oxfordshire welcomes Development Policy 31 - Protection of Public Rights of Way, National Trails and Open Access Areas - as a new and positive statement of intent.

However, some minor amendments (see below) are proposed in order to ensure the policy and supporting paragraphs are fully justified and effective.

(Continue on page 4 /expand box if necessary)

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We propose the following two minor amendments to the wording in order to make it fully justified:

a) In the final paragraph of DP31:

“Development will not be permitted where proposals remove, narrow or materially impair the approved line of the Thames Path or Ridgeway National Trails (**including the Icknield Way Trail**), **other promoted routes such as the Oxford Green Belt Way and the d'Arcy Dalton Way**, and key connecting routes, and / or public access to them.”

[Our suggested amendments in bold]

b) Paragraph 3.263 should be strengthened by deleting "Developers will also be encouraged to consider" and inserting "Developers must consider".

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Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

Policy
DP32

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

YES

4. (2) Sound

YES

4. (3) Complies with the Duty to Cooperate

YES

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

CPRE welcomes the commitment by the Council to the restoration of the Wilts and Berks Canal and the safeguarding of the historic line from further development.

(Continue on page 4 /expand box if necessary)

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

(Continue on page 4 /expand box if necessary)

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

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 hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

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Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

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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.

Title	Mrs	
First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	First Floor	
Address Line 2	20 High Street	
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

2. Agent's Details (if applicable)

Sharing your details: please see page 3

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

Policies Map

Chapter 3 – Development Policy 36 (Heritage Assets)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Development Policy 36: Heritage Assets

NPPF paras 126-7 encourage conservation of non-designated as well as designated heritage assets, but while policies 36 and 39 of the Vale Local Plan Part 2 on archaeology refer to non-designated assets, there is no **policy** to designate or conserve locally listed buildings, parks and gardens and other heritage assets. This not only fails to meet fully the expectations of national policy in terms of positive and effective planning for the historic environment, but also fails to reflect the Council's own existing practice – and references made in the text (eg para 3.321 to a list of local parks and gardens).

Several heritage assets have been locally listed helping to ensure their retention and/or their settings are better safeguarded as a result of the Council's proactive approach that engages with the public who help to nominate locally important heritage for inclusion. NPPF puts the principles of heritage conservation on a continuous sliding scale in which heritage value is balanced against development need. Policy on such local designations must therefore follow the same principles and sequential tests as for designated assets, in which it is clear that the balance shifts, but includes locally important as well as national assets.

While the reference to 'routeways' in policy is welcome, it would be much better made here where their contribution to wider historic character is better represented and can be extended to historic waterways (eg Thames Wilts and Berks Canal) and surviving historic railway infrastructure (noting the international historic significance of Brunel's Great Western Railway).

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

We propose the deletion of the whole of para 3.325, since it is identical to 3.324.

Before Para 3.304 insert:

[3.303a] In addition to nationally designated heritage assets the Council has already instituted a local heritage list, which it will continue to develop with input from the public. Over the course of the plan period the Council will also explore the desirability of developing a Heritage Plan to ensure practical delivery of the benefits to be derived from the historic environment, following Historic England's guidance and learning from the experience of other authorities.

We propose replacement of Policy 36 with the following amended version (changes underlined) which includes some grammatical changes to clarify meaning. These modest additions address these matters and would bring the policy more into line with national policy and statutory obligations.

Development Policy 36: Heritage Assets

The Council will continue to maintain and develop a list of heritage assets of local importance to which the same heritage management principles will be applied as those for designated assets below (Policies 37-9), taking account of their relative importance and the sequential tests set out in national planning policy.

*Proposals for new development that may affect heritage assets (designated and non-designated) must demonstrate that they conserve and enhance the special interest or significance of the heritage asset and its setting in accordance with **Core Policy 39** (Local Plan 2031: Part 1), and particularly where they:*

- i. make a positive contribution to local character and distinctiveness (especially if identified as such by county and local landscape and historic landscape characterisations); and / or*
- ii. make a positive contribution towards wider social and economic benefits; and / or*
- iii. provide a viable future use for a heritage asset that is consistent with the conservation of its significance; and / or*
- iv. protect a heritage asset that is currently at risk, safeguarding or restoring its historic interest in a sustainable, non-damaging use.*

This policy includes historic routeways, waterways and railway infrastructure.

Within 5 years of the adoption of this Part 2 Plan the Council will explore the desirability of developing a formal SPD Heritage Plan in line with Historic England guidance to ensure that the positive benefits that the historic environment brings to resident communities and visitors are delivered.

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?

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:

We believe that CPRE has a useful understanding of these issues and could contribute meaningfully to this discussion.

These suggested amendments raise issues concerning scope and relation to NPPF policies and interaction of designated and non-designated assets that may warrant further explanation.

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

Signature:

Date:

Sharing your personal details

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Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

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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.

Title

Mrs

First Name

Helen

Last Name

Marshall

Job Title (where relevant)

Director

Organisation representing
(where relevant)

CPRE Oxfordshire

Address Line 1

20 High Street

Address Line 2

Address Line 3

Postal Town

Watlington

Post Code

OX49 5PY

Telephone Number

01491 612079

Email Address

director@cpreoxon.org.uk

2. Agent's Details (if applicable)

Sharing your details: please see page 3

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 38

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

No

4. (2) Sound

No

4. (3) Compiles with the Duty to Cooperate

Yes

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Development Policy 38: Listed Buildings

Policy 38 as it stands is **not sound** because it is not sufficiently positive and in seeking to condense what had been several policies it has omitted a number of quite different circumstances (eg as between an application for listed building consent and a planning consent that affects the setting of listed buildings on or adjacent to the site). Several points referred to in the supporting text are not reflected in the policy. By omission the policy implies that:

- i) The process does not require any form of assessment or analysis of heritage significance and impact;
- ii) Retention of features of special architectural or historic interest is not a pre-requisite (thus if such features are not retained they do not need to be ‘respected’; that ‘respecting’ their former existence is all that is needed);
- iii) The policies and principles behind them apply mainly (or only) to urban contexts, whereas most of the district is rural and has important rural historic character;
- iv) That possibility for enhancement, repair, restoration etc is very restricted and/or not a significant consideration;
- v) Historic character of both the building(s) and surroundings is not much of a consideration, contrary to NPPF.

In addition, there are infelicities of wording and phrase order that introduce ambiguities as to whether provisions apply to the development proposals or the heritage assets to be conserved or enhanced.

(Continue on page 4 /expand box if necessary)

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

We propose replacement of Policy 38 with the following amended version (changes underlined) which includes some grammatical changes to clarify meaning. These modest additions address these matters and would bring the policy more into line with national policy and statutory obligations.

Development Policy 38: Listed Buildings

Proposals for additions or alterations to, or the demolition of, a Listed Building (including partial demolition), or for development within the curtilage of, or affecting the setting of, a Listed Building must demonstrate, using best practice based on relevant national guidance, exactly what features or aspects of historic or architectural interest would be altered by the proposals and that what is proposed will:

- i. conserve or enhance the heritage significance and setting of the listed building(s) on and adjacent to the site*
- ii. retain, respect and as appropriate restore any features of special architectural or historic interest, including, where relevant, structures and trees, the historic curtilage or context, such as burgage plots, parkland or fields and paddocks, or its value within a group and / or its setting, such as the importance of a street frontage or traditional shopfronts, designed landscapes or historic farmyards, including how the historic character of the area contributes to their significance*
- iii. through appropriate design, in accordance with Core Policy 37 and the Design Guide Supplementary Planning Document, be sympathetic to the Listed Building(s) and its/their setting(s) in terms of siting, size, scale, height, alignment, materials and finishes (including colour and texture), architectural design, form, and character, in order to retain their special interest; and*
- iv where desirable and reasonably practical, will rectify past harm.*

Proposals for the change of use of a Listed Building or building within its curtilage will be viewed favourably where it can be demonstrated that the new use will ensure the sustainable survival of the building in a manner appropriate to its historic character and can be accommodated without any adverse effect on the special architectural or historic interest of the building and its appearance or character.

(Continue on page 4 /expand box if necessary)

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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?

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:

We believe that CPRE has a useful understanding of these issues and could contribute meaningfully to this discussion.

This area of policy is sensitive and one to which statutory obligations apply and to which 'great weight' must be given. The nuances of policy wording are important and reflect a complex set of balancing criteria and considerations that need to be more fully explained to ensure the points are fully appreciated and that the wording proposed is correct (or clarify what it should be to address the issues raised).

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

Signature:

Date:

Sharing your personal details

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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.

Title	Mrs	
First Name	Helen	
Last Name	Marshall	
Job Title (where relevant)	Director	
Organisation representing (where relevant)	CPRE Oxfordshire	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Post Code	OX49 5PY	
Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

2. Agent's Details (if applicable)

Sharing your details: please see page 3

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

Policies Map

Development Policy 39

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Development Policy 39 - Archaeology and Scheduled Monuments

Policy 39 is mostly sound, but the first and final sentences of the last paragraph do not accord with NPPF para 141 which states: Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.^{fn30} However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

[fn30: Copies of evidence should be deposited with the relevant Historic Environment Record, and any archives with a local museum or other public depository].

Furthermore, as drafted, the phrase 'in exceptional cases' appears to mean that the whole of the rest of the paragraph only applies as an exception, but this is nowhere indicated in NPPF. Quite to the contrary, Para 141 makes recording and investigation a general requirement where, despite minimising harm, valuable evidence would nonetheless be destroyed.

As drafted, policy 39 also fails to mention the Historic Environment Record as the primary source of information about what discoveries have been made.

It makes no provision for deposition of archives which are often vital for future research, as archaeological ideas and techniques develop.

Also, publication should be in an appropriate form – ie as NPPF indicates, commensurate with the importance of the results.

Policy 39 is also unsound because as drafted and positioned within the archaeology policy it only applies these investigatory and recording provisions to monuments and sites, whereas NPPF Para 141 applies to all types of heritage asset – including listed buildings, conservation areas parks and gardens etc.

This paragraph should therefore be redrafted as indicated below and EITHER transferred to the more general provisions under Policy 36 OR included as a separate policy 40.

(Continue on page 4 /expand box if necessary)

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

Re: Policy 39 we propose the deletion of the last paragraph and a redraft as follows to be added to the end of Policy 36 OR as new policy 40:

~~In exceptional cases~~, Where, in accordance with national policy, harm to or loss of significance to any heritage asset is considered to be outweighed by other material considerations, the harm should be minimised; and where nevertheless valuable evidence would be lost, such loss should be mitigated by a programme of appropriate investigations, recording and analysis. Planning permission will not be granted until this programme has been submitted to, and approved by, the local planning authority, and development should not commence until these works have been satisfactorily undertaken by an appropriately qualified organisation. Developers will be expected to report the results of any investigations into heritage assets occasioned by their proposals to the relevant local and county authorities and records, including the Historic Environment Record; to deposit the archive of records and finds arising from such investigations in a publicly accessible repository as a resource for future research; and to ensure that the results and analysis of findings are published in an appropriate form.

At the end of each of policies 37, 38 and 39 insert:

Provision for recording, analysing, reporting, archiving and publishing evidence arising from investigations undertaken to assess the importance of the asset or to mitigate harm arising from the loss of evidence will apply as set out in Policy 36 [or 40].

(Continue on page 4 /expand box if necessary)

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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:

These suggested amendments are technical but important to be correctly worded for them to work properly and this may benefit from input by CPRE's expert advisor.

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

Signature:

Date:

Sharing your personal details

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Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

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First Name	Helen	
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Telephone Number	01491 612079	
Email Address	director@cpreoxon.org.uk	

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Part B – Please use a separate sheet for each representation

Name or organisation: CPRE Oxfordshire

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

Paragraph

4.1 to 4.7 &

Policy

Sustainability Appraisal, Appendix N
& Policy 47a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

NO

4. (2) Sound

NO

4. (3) Complies with the Duty to Cooperate

YES

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

The Need for Phasing

The District Council and the Inspector appear to have a common understanding, that we do not share, that in order to satisfy the five-year housing supply requirement the Council must demonstrate that it has a sufficient housing supply to 2031 – 14 years from now. Perhaps as a result, we find no suggestion in the Plan that the housing allocations shown in the draft will be phased over the period of the Plan. In the absence of such a phasing scheme, it is only too likely that, once the Plan is adopted, the developers will bring planning applications forward as soon as practicable and in an uncontrolled sequence, with the risk of substantial mismatches between the putative growth in jobs and the availability of housing. This adds to the severe risk, to which we have drawn attention before, that much of the new housing will be taken up by people commuting to work outside the Vale or Oxford.

We note here a concern that more and more housing in the Vale is likely to be taken by those commuting outside the District or for investment purposes only, thus making it more and more difficult to meet local needs and sustain a vibrant community. We draw your attention to such reports as made front page news in The Times newspaper on Friday 7 April, titled ‘Foreigners dominate market for new homes’, by Andrew Ellson, where it was stated that ‘93% of flats in one of Manchester’s biggest housing developments had been bought by foreign residents or companies registered overseas’. The Vale has been, and we hope will continue to be, a particularly attractive place to live and work and its communities deserve to be protected by the Local Plan 2031.

Absence of effective monitoring coupled with prescribed and timely actions in case of failure to meet expectations

Associated with our concern about the absence of any phasing of the proposed development programme is our belief that there needs to be a mechanism for calling a halt to premature development if the expectation of job growth far in excess of historical trends is not fulfilled. The consequence, as noted above, could be an undesirable growth in commuting outside the area, ghost estates with severe under-occupancy, or half-completed eyesores.

Sustainability Appraisal

The **Sustainability Appraisal** does not comply with the SEA Regulations in that it does NOT predict the actual likely effects on the environment as required under Regulation 12(3) and Schedule 2, especially in respect of:

- landscape quality or character;
- dark skies and light pollution;
- loss of tranquillity
- loss of species and habitats (or habitat creation);
- historic landscape and character;
- loss of or harm to heritage assets and their settings;
- loss of archaeological sites and the implications for local resources to access and curate resultant materials.

Nor does it set out the practical measures required to “*prevent, reduce and as fully as possible offset*” the actual on-the-ground effects of development on such environmental assets and characteristics.

All these factors that contribute to peoples’ quality of life are both predictable and capable of being monitored to a reasonably good degree. There are also means by which harm could be (in the words of the SEA regulations) remedied reduced or offset where unforeseen effects arise.

Paragraphs 4.1 to 4.7, Policy 47a & Appendix N

Paragraphs 4.1 to 4.7 of the Part 2 Plan make no reference to monitoring the actual environmental effects of the Plan; nor does **Policy 47a**. These ONLY explicitly concern delivery of development, NOT environmental protection. This is exacerbated by **Appendix N**, where the monitoring measures for the Development Management Policies also make next to no reference to actual changes to the environment, only decision-making procedures, with no provision to remedy, reduce or offset unforeseen impacts on the ground.

As such the Plan is not compliant with Regulation 17(1) of the SEA Regulations (SI 2004 No. 1633) which requires that:

The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

While the monitoring measures proposed below may seem extensive, at present Appendix N is notable for the extreme sparseness of environmental monitoring measures as well as their ineffectualness in terms of real change rather than just procedural activity (which has more to do with the council’s performance against legal requirements than anything in the real environment. All the measures proposed are either very readily implemented by officers keeping simple checklists in the course of casework, or can be based on data assembled via

third parties, including community groups whose engagement in monitoring their environment would be socially beneficial.

(Continue on page 4 /expand box if necessary)

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

We believe it is an urgent priority to establish the principle of FREQUENT formal audit of job growth against housing starts, with an ability to call a SWIFT halt to approvals if job growth falls short of expectation. (Note that this reinforces the need for a recognised phasing of developments within whatever allocations are finally adopted.)

In addition, we propose the following specific text changes:

Text paragraphs 4.1- 4.7:

4.3. We will continue to work jointly with stakeholders to deliver Local Plan 2031 objectives. This will include partnership working with both public agencies and the private sector and is necessary to ensure development progresses and environmental protection and social benefits are delivered in a manner consistent with the strategy identified in this plan and the three core strands of sustainable development.

4.5. The Council will publish information at least annually to show progress with Local Plan implementation including environmental and social policies in its Authority Monitoring Report.

4.6. The Council has included a Monitoring Framework at **Appendix N**, which identifies how the Council will monitor the effectiveness and implementation of the Local Plan 2031: Part 2 for each policy. The Council recognises that appropriate action will need to be taken if implementation of the plan or its environmental and social policies is clearly off track.

Core Policy 47a: Delivery and Contingency

Core Policy 47a will work in tandem with Core Policy 47 to ensure effective monitoring of both Local Plan 2031: Part 1 and Local Plan 2031: Part 2.

If the Local Plan 2031: Part 2 policies are not delivered in accordance with the Monitoring Framework set out in **Appendix N** the contingency measures identified in the Monitoring Framework will apply.

As with Local Plan 2031: Part 1, if the development of the additional sites and Sub Area Strategies identified in Local Plan 2031: Part 2 is not taking place as envisaged, the Council, in conjunction with its partners, will investigate the reasons for the situation and will implement appropriate action which may include one or more of the following:

- i. seeking alternative sources of funding if a lack of infrastructure is delaying development or causing significant problems as a result of new development;
- ii. seeking to accelerate delivery on other permitted or allocated sites
- iii. identifying alternative deliverable sites that are in general accordance with the spatial strategy of the Part 1 Plan, through the appropriate mechanisms; and if required

- iv. undertaking a partial or full review of the Local Plan 2031, if investigation indicates that its strategy, either in whole or in part, is no longer appropriate
- v. adopting appropriate preventative or remedial measures or (if irreversible) compensatory if environmental protection is less effective than it should be.

Appendix N

Insert following environmental monitoring measures

Overall environment: number of applications approved contrary to external and/or internal technical advice

Landscape Green Belt and Dark Skies:

- **AONB:** number of applications passed contrary to advice of N Wessex Downs AONB Partnership; number of applications affecting NWD AONB that are Schedule 2 development under EIA regulations and number of screening opinions issued; number of applications classed as 'major development' in NWD AONB and proportion approved;
- **General Landscape:** area over which development-based landuse change would lead to alteration of a) landscape character type boundaries and b) historic landscape character types; extent of change to or loss of pre-19th century HLC types
- **Dark Skies:** number of dark skies designations (discovery sites, areas, communities etc) recognised within or partly within the Council's area; changes to CPRE dark skies qualitative mapping; extent of light pollution reduction measures introduced on roads and housing areas; number of dark skies community events; astronomers' monitoring of visibility of key star clusters on clear nights
- **Green Belt:** number of applications approved that trigger the test of 'very special circumstances'; number of cases where the test of 'very special circumstances' relates to so-called 'fall-back' positions arising from permitted development proposals or potential options
-

Development Policies 36 to 39 (Historic Environment):

- **Conservation Areas:** number of Conservation Areas and proportion with up-to-date appraisals; number of CA applications that enhance a CA; number of applications that detract from CA character or result in loss of open space that contributes to character; number of cases affecting the setting of a CA by developing countryside immediately bordering historic settlement.
- **Listed Buildings and locally listed buildings:** number of listed building consent applications involving loss of fabric and/or character not offset by beneficial changes; number of applications notifiable to Historic England and amenity societies; number of applications involving harm only justifiable on basis of being clearly outweighed by substantial public benefits; number of applications in which setting issues are an adverse material consideration;
- **Registered Parks and Gardens:** number of applications involving loss of fabric and/or character not offset by beneficial changes; number of applications notifiable to Historic England and amenity society;
- **Scheduled Monuments and archaeology:** number of applications requiring Scheduled Monument Consent for loss of fabric; number of applications requiring desk studies, field evaluation/survey and full investigation; number of excavations over 20m²
- **Recording and Investigation:** number of applications involving recording and investigation according to heritage asset type; volume of storage space in public repositories required for investigation archives; number of investigations published

(by type of publication)

(Continue on page 4 /expand box if necessary)

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?

Yes, I wish to participate at the oral examination

YES

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

CPRE has a long-standing concern with this issue, and would very much wish the opportunity contribute to this discussion.

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

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related

documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk