

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	Julia	
Last Name	Hammett	
Job Title (where relevant)		
Organisation representing (where relevant)	Oxfordshire Badger Group	
Address Line 1	c/o 29 Webbs Way	
Address Line 2	Kidlington	
Address Line 3		
Postal Town		
Post Code	OX5 2EW	
Telephone Number		
Email Address	obg@oxonbadgergroup.org.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Oxfordshire Badger Group

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

Paragraph

Policy

☒

Policies Map

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.

In contravention of NPPF Paragraphs 109,117,118 : ‘the planning system should contribute to and enhance the natural environment by minimising impacts on biodiversity where possible and should aim to conserve and enhance biodiversity contributing to the Government’s commitment to halt the overall decline in biodiversity , including by establishing coherent ecological networks that are resilient to current and future pressures’.

In contravention of CP46 Local Plan 2 ‘development will conserve, restore and enhance biodiversity’.

(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.

Sites for development have been selected with little or no field investigation of wildlife and habitats present. Habitat and wildlife investigations have been limited to SACS and SSI s. The Council should have a coherent habitat / species overview of the impact of their housing plans in the Local. Other Councils like some in Surrey, are carrying out an audit of species in areas being considered for development. Piecemeal development and encroachment on green fields will lead to fragmented habitats and foraging and further depletion of Oxford's dwindling wildlife. A comprehensive Environmental Impact report and audit of species rich sites, should be a prerequisite rather than an afterthought. Without this, the Local Plan is in contravention of NPPF 109 'the planning system should contribute to and enhance the natural environment by minimising impacts on biodiversity'. Oxfordshire's wildlife is already under threat. The Local Plan does nothing to address this.

Sustainability Appraisal in Topic Paper 6 includes one relevant objective to 'improve and protect natural environment including biodiversity, water and soil quality'. There is no confidence that the scale of development proposed will ensure this.

The Local Plan should give far more prominence to the environmental impact of proposed schemes. There is no evidence of joined up thinking in the Vale's plans in relation to habitats, wildlife corridors and essential 'wild spaces' rather than green, manicured spaces for the general public.

Didcot 'garden city' allows for wildlife in only one area, and there is no evidence of a mosaic of habitats or wildlife corridors. Another missed opportunity. Lack of interconnectedness for wildlife is a failing of the Local Plan as built areas merge and there are no green spaces separating settlements. With so much building on additional green fields at Kingston Bagpuize, East Hanney and Marcham, to meet the so called but unproven 'unmet housing needs' being pushed by Oxfordshire Growth Board, much of our wildlife will be lost.

Sites which are regarded as brownfield like Dalton Barracks and Harwell Campus are often rich in species. The Strategic sites at North Abingdon, Radley, Kennington, Wantage, Grove, SW Didcot, Milton Heights and Sutton Courtenay will lead to a large scale net loss of habitat for wildlife with little chance of any offset land.

Land allocated at Whites Lane Radley for housing in the Vale Local Plan is a disused quarry which is species rich, supporting badgers, deer and bats and should never have been considered for development.

The Local Plan is in contravention of the NPPF as it will result in a large scale loss of biodiversity and protected species.

(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?

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

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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:

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: 21.11.17

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

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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.**

The public consultation period of 6 weeks is far too short for such a major plan. Despite all the documents only a small fraction relate to wildlife, habitats or biodiversity.

The Local Plan(2) will lead to fragmentation of species and habitats and provides no realistic strategies for complying with the NPPF in relation to the natural environment.

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