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Objection to the draft Local Plan Part One 2031

We wish to object to the draft Local Plan Part One 2031 on the basis that it is **'unsound'**.

We outline below our reasons, and what must be done, if the Vale of the White Horse, and indeed Oxfordshire as a whole, is not to lose its character and identity.

Re: Core Policy 4 & all others which flow from it – in particular Core Policies 8, 13, 15 & 20:

1. The SHMA is unsound & unsustainable and should not be relied upon.

The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA) which has been criticised by the public, politicians and organisations (such as CPRE). A leading planning expert commissioned by CPRE Oxfordshire concluded in an independent critique of the SHMA that the SHMA's estimate is likely to be **'grossly overstated'** by a factor of **over two**.

There has been no response to these criticisms – or any attempt to instigate an independent review of the SHMA & there is no evidence that the Council has given them appropriate consideration.

2. The Vale District Council has failed to give proper consideration to the environmental & social constraints within the District:

The SHMA itself says it is just a starting point & only part of the evidence base for determining housing need & that further work needs to be done to test whether it can be accommodated sustainably **before** adopting it as a housing target. The VWHDC did **not** attempt to undertake this further work before adopting the SHMA figures without question; it should first have assessed them against **social, environmental & infrastructure** considerations. Much of the proposed housing will not be sited close to the areas where employment is & is envisaged in future. There will be added traffic movements in an area where traffic is already congested, with serious traffic jams on a daily basis.

Re: Core Policy 13 Oxford Green Belt, Core Policy 8 – Spatial Strategy for Abingdon & Oxford fringe Sub Area & Core Policy 15 – Spatial Strategy for SE Vale Sub Area.

3. The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified **four** development sites in the **Green Belt** to accommodate **1,510** houses; and **two** in the **AONB** for a total of **1,400** houses, which is threatening to undermine the **rural character** of the Vale. A **further 11 sites** are proposed for removal from the Green Belt. *We're very worried that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.*

Green Belt – The Plan is inconsistent with planning guidance & government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green belt boundary may be altered only in ‘**exceptional circumstances**’.

Also recent guidance (6 March 2014) states that “**Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt & other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt**”.

In areas close to where we live - such as North & North-West Abingdon-on-Thames; South Kennington; North & North Radley - good, productive agricultural land will be lost. The public is encouraged to research where their food source comes from. If we buy locally, we are able to check on food quality and, in addition, cut down on the necessity to have food travelling great distances by road etc. Peachcroft Farm Radley (earmarked in the draft plan) is one location where the public can go & buy produce direct from the farm. It is a well managed farm & is an important part of the community. Its very existence is in doubt if much of the farm’s land is taken for development & livelihoods/jobs will be lost. Important wildlife sites – such as ancient woodland – will also be badly affected.

North Wessex Downs AONB – Under the Countryside and Rights of way Act 2000 the Council has a statutory duty to have regard for the purposes for which the North Wessex Downs were designated an AONB, that is to conserve & enhance the natural beauty of the landscape. NPPF puts AONBs in the highest category of landscape protection & affords them “great weight” in the decision-making process. Further to this NPPF confirms that AONBs are one location where restrictions apply to development & accordingly that “Planning permission should be **refused** for major developments in these designated areas except in exceptional circumstances & where it can be demonstrated they are in the public interest.”

Re: Core Policy 7 – Providing Supporting Infrastructure:

4. There is a lack of appropriate infrastructure to support the Plan as outlined. We cannot see how public services & infrastructure (such as the road network) which are already over-stretched in many places can possibly be improved within the timescales to meet such a great increase in demand. We do not believe that the District will be able to cope with this level of growth & are very concerned about the impact it will have on the communities, environment & countryside. We believe therefore the Plan as it currently stands to be ineffective and unsound. We also firmly believe that all infrastructure should be considered at greater length & be put in place before large developments start.

Re: Core Policy 4 –

5. The consultation process has been bad. The report to the Council about the consultation process ignores important procedural & policy challenges & seriously understates opposition to the proposals voiced both in the several thousand written comments received & at public meetings convened to discuss the plan. We therefore believe the Plan has not been prepared positively. In our view the public have had very little time to try & read & comprehend the vast documentation & their views have not been taken into account.

Mr & Mrs R C-Fisher