

Peter Hamilton
Tithe Barn House
11 High Street, Cumnor
Oxford OX2 9PE



Planning Policy Dept
Vale of White Horse District Council
Benson Lane
Crowmarsh Gifford
Wallingford
OX10 8ED

19th December 2014

Dear Sirs

I am writing to provide my objections to and comments upon the draft Local Plan 2031. I have chosen to do so because the consultation website is extremely user-unfriendly, unnecessarily time-consuming does not provide a way of making comments and objections in democratic manner, as a resident and tax-payer. The form to be used to comment on the Plan, is also not user-friendly but seems designed to make the Council's life as easy as possible. Those visiting the website will gain the impression that there is no other valid mechanism through which to comment, something which is totally unacceptable to our rights as citizens.

I wish to object to the draft Local Plan 2031 on the following grounds.

That it is fundamentally unsound and as a result would, if upheld, do serious harm to the social and environmental character and identity of the Vale of the White Horse, and Oxfordshire as a whole.

Objections in more detail:

1. Re: Core Policy 4 and those which it engenders, cf Core Policies 8, 13, 15 & 20:

(a) *The SHMA is unsound and unsustainable and should not be relied upon.* The SHMA for the Vale was prepared by a firm whose principal business is the supply of planning advice to property developers. It was never tested by independent peer review. It is thus only a "guesstimate" and not an objective measure of real housing demand. Moreover it is fatally flawed in that it has generated exceptionally high and untested forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA). It has been much criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA commissioned by

CPRE Oxfordshire, a leading planning expert (Dr. Wenban-Smith) concluded that the SHMA's estimate housing demand is likely to be 'grossly overstated' by a factor of over two.

My understanding is thus that:

The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;

The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and

Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and housebuilding rates and it has not been subject to public consultation or independent scrutiny.

However, I cannot find any mention — either in the Vale's documents or on its website — of replies to these criticisms, nor any signs of an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

2. VOWH District Council has failed to give proper consideration to the environmental and social constraints within the District:

As the SHMA was only intended to be a starting point and thus even if validated would only provide part of the evidence base for determining housing need, it is clear that further work needs to be done to test whether it could be accommodated sustainably before adopting it as a housing target. No evidence is provided in the Vale's documentation that the Council did undertake any such further work before adopting the SHMA data unquestioningly. If these figures are to guide important strategic policy affecting the lives of many people and communities in the Vale and beyond, it had a duty to assess them against social, environmental and infrastructure considerations.

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:

The Vale's uncritical and unscientific 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. Like all of our neighbours I am very concerned 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. In Cumnor where I live, certain of the sites proposed for release have already been turned down by the Vale

itself as being unsuitable for development, yet as any observer of local planning questions will be very aware, even the smallest release of Green Belt land is likely to produce immediate development proposals.

Thus Green Belt release is irresponsible in the context both of general planning principles and of the rural character and identity of historic villages in the Vale such as Cumnor. Moreover the Government has clearly instructed Councils *not* to release Green belt in contexts such as Cumnor and the other village sites in the Vale, as stated in the NPPF and in specific statements from Mr Eric Pickles MP as recently as October 2014. I thus strongly object to the manner and the non-compliance of the proposed release of sites from Green Belt in Cumnor.

Green Belt

Hence the 2031 Plan is inconsistent with planning guidance and 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'.

In addition recent guidance by the Minister (6 March 2014) states that: 'Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.'

The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim remains to prevent urban sprawl by keeping land permanently open. Boundaries of Green Belts should only be changed in "*exceptional circumstances*", and unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt.

If allowed, the selective and apparently piecemeal removals of Green Belt proposed in the Plan would significantly add to the urban/suburban sprawl between Abingdon and Oxford, and wreak severe environmental and social damage on the area.

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 and enhance the natural beauty of the landscape.

The NPPF places AONBs in the highest category of landscape protection and affords them "great weight" in the decision-making process. Further to this the NPPF confirms that AONBs are one location where restrictions apply to development and accordingly that: '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.'

Re: Core Policy 7 – Providing Supporting Infrastructure:

There is a lack of appropriate infrastructure to support the Plan as outlined. I cannot see how public services and infrastructure, such as the road network, which are already over-stretched in many places (for example; the A34 and its feeder routes, schools and medical services) can possibly be improved within the timescales to meet such a great increase in demand. I do not believe that the District will be able to cope with this level of growth and I am very concerned about the impact it will have on the environment and the countryside. I therefore believe the Plan as it currently stands to be *ineffective and unsound*.

4. Legal Compliance

The *Local Plan 2031* of the Vale of the White Horse District Council (hereafter referred to as 'the Vale'), published in November 2014, in proposing to remove five stretches of open countryside from the Oxford Green Belt in Cumnor Parish contravenes binding national government policies and guidelines on Green Belts as laid out in the *National Policy Planning Framework*, most notably by breaching four of that Framework's five stated overriding purposes, as follows:

To check the unrestricted sprawl of large built-up areas [*in this case, Oxford city*]

To prevent neighbouring towns merging into one another [*in this case, Oxford and the surrounding settlements*]

To assist in safeguarding the countryside from encroachment [*in this case, the long established Oxford Green Belt*]

To preserve the setting and special character of historic towns [*in this case, Cumnor with its notable literary and historical associations*].

The *Framework* states:

'The Government attaches great importance to Green Belts. The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.'

In addition, on 6th October 2014, the Housing and Planning Minister and Communities Secretary, Eric Pickles, reiterated and strongly re-emphasised that 'this government has been very clear that when planning for new buildings protecting our precious green belt must be paramount'. In considering this statement it should be borne in mind that the Oxford Green Belt is one of the narrowest and most vulnerable in the country, being only four to six miles wide and, as such, very liable to incremental erosion at its fringes.

The guidance the Minister issued on that date further laid down that 'the established green belt boundaries should only be altered in exceptional circumstances'. The Vale's *Local Plan 2031* fails comprehensively and

convincingly to identify such circumstances and has not followed this guidance:

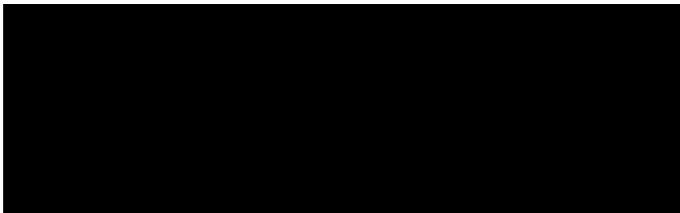
It is based on a County *Economic Growth Plan* drawn up without public consultation and scrutiny and on the inaccurate and grossly inflated projections contained in the County's *Strategic Housing Market Assessment* (SHMA);

It is rooted in a flawed, piecemeal and contradictory *Green Belt Review* carried out by the Vale;

It rests, according to Cumnor Parish councillors of long experience in these matters, on unrealistic infrastructure provision and a Design Guide that is very partial and inadequate;

And, finally, the *Local Plan* has signally failed in its responsibilities to allow for sufficient consultation – now, in the past and in the period that lies ahead. As an illustration of the latter is the contrived, bureaucratic, anti-democratic and obfuscatory way in which "consultation" has been undertaken. It has been abbreviated to a very short period of time (6 weeks) for such a major and far-reaching sets of proposals. In addition, the process for making "representations" is ridiculously complicated, with those who have used the online process or even the very detailed form provided by the VOWH finding that it requires hours of work to complete, and is thus a real barrier to democratic expression.

Yours sincerely



Peter Hamilton