



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

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

Dr

First Name

Jane

Last Name

Impey

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

2 Abingdon rd

Line 2

Cumnor

Line 3

Oxford

Line 4

Post Code

OX2 9QN

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : Dr Jane Impey

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

Paragraph

Policy

1

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

These comments refer to Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 8, 13, 15 & 20.

Unsoundness and unsustainability of Oxfordshire SHMA

- These policies are *unsound*. The calculation of 'sustainable development' based on the exceptionally high forecasts of housing need proposed in the Oxfordshire Strategic Housing Market Assessment, is itself unsound and unsustainable. The Local Plan policies are therefore *unjustified*. The Plan states that '*the housing target reflects the Objectively Assessed Need for the Vale of White Horse District as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire. The SHMA sets out how many new homes are required across Oxfordshire and for each district up to 2031.*' This statement is invalid: since the SHMA figures are inflated and do not constitute a Proper assessment of the housing needs of the Vale.
- I agree with the arguments presented by CPRE showing why the SHMA figures should be regarded as inflated and unsustainable.
- The SHMA relies on the Oxfordshire Strategic Economic Plan (SEP), to provide the economic base line and the associated adjustment for planned jobs growth on which its predictions are based. The SEP has not been

subject to public consultation or any independent scrutiny, and is therefore not an appropriate basis on which to make policy decisions.

SHMA failure to meet the sustainability requirements of the NPPF

- The NPPF requires the economic, social and environmental aims to be pursued 'jointly and simultaneously'.
- It is essential that plans are realistic but the Plan neither justifies the figures used nor explains how any shortfall would be ameliorated.
- I support the CPRE's conclusion that the Oxfordshire SHMA is disproportionate and unrealistic.
- The risk of serious harm from over-allocation is great. Builders prefer greenfield land. This will lead to a more dispersed pattern of development encroaching on rural Oxfordshire. This will be damaging to Oxfordshire as an attractive business location and as a place to live and the damage will of course be irreversible.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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 SHMA figures should only be taken into account, alongside the figures derived from published government household projections thereby using the most probable numbers rather than extreme figures.

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, I do not wish to participate at the oral 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:

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

Signature:

Date:

17 December
2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Dr Jane Impey

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

Paragraph

Policy

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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These comments refer to the Vale District Council's use of the SHMA figures [Core policy 4: Spatial Strategy – see also core policies 7 (Infrastructure), 8, 15, 20 (sub-area spatial strategies)]

Unjustified Prematurity

- The SHMA has not been tested with respect to the relevant needs for roads, schooling, drainage, health provision etc. The Vale has failed to meet the requirement of the NPPF for the social, economic and environmental elements of sustainable development to be considered together.

Unsustainability

- The National Planning Policy Framework identifies three requirements for sustainable development – economic, social, and environmental

Economic

- Road capacity is a major case in point with well-documented overloading on the main roads such as A40 and A34 in the District and on many of the minor roads at the points where they join them. This leads to many delays and inefficiencies in people getting to work.
- The recent announcement of £50m funding for improvements to the A34 is welcome, but it is widely recognised as a palliative measure for easing the pain of congestion. In the long-term there will remain capacity issues on the A34 and much more substantial improvements will be needed in the

long-term.

- Apart from the A34 and A40, there are major traffic problems on the A420, A338 and, on the A415 and the A417.

Social

- I support the CPRE's comments concerning the social and environmental issues.
- There is a complete absence of reassurance about the availability of adequate medical support in any of the developments in the Plan

Environmental

- The NPPF requires plans to contribute to protecting and enhancing the natural, built and historic environment. These plans demonstrate disregard for the environmental requirements of the NPPF and recent Government guidance (October 2014).

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No Plan should be approved until the NHS has provided the necessary assurance that appropriate medical resources will be provided.

Sites should not be included in the Plan unless the Vale is able to demonstrate that the infrastructure can be supplied in a timely manner.

The Vale should critically review the figures emerging from the SHMA to avoid the unsound aspects highlighted above, and to prepare an appropriately revised 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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Signature:

Date:

17th December
2014

Part B – Please use a separate sheet for each representation

Name or Organisation :Dr Jane Impey

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

X

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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These comments refer the Vale District Council's *Core Policy 13: The Oxford Green Belt*

General comments

- The Plan is not consistent with planning guidance and government policies on the protection of Green Belts.
- The Oxford Green Belt has stood the test of time since its approval in 1975 and, in accordance with Government policy, the land has been kept permanently open and the countryside safeguarded from encroachment. This policy reflects deserved credit on the Vale Council.
- Paragraph 79 of the National Planning Policy Framework sets out Government policy on Green Belts:

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

- 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.
- The guidance provided by the Government that supports this conclusion is set out by CPRE in its submission.
- In the Plan the Vale proposes to remove 22 sites from the Green Belt. The proposal is against Government's aims, and would be unnecessary if the SHMA housing figure had been tested properly and reduced in the light of social and environmental considerations.
- More seriously even in areas such as Cumnor, where the immediate threat of a development of houses has been withdrawn, the Vale still proposes to go ahead and remove the areas from the green belt. **This would enable the Vale to sanction building in the current green belt as a two stage process: first remove the areas from the green belt then approve the developments**

Comments specific to Cumnor

Eight separate sites are scheduled for removal from the green belt. It has proved impossible to determine why these areas were selected for removal from the green belt. The only guidance was an oral response to a question suggesting that to the Vale these changes 'rounded out' the built up areas. This does not seem to be an acceptable reason for removing areas from the green belt.

- Area 24 is at the very centre of the Village and largely consists of the existing cricket ground and the grounds of Cumnor Place. The latter area contains much of historical interest including the remains of an Elizabethan garden and remnants of much older habitation and agricultural use. The proposal to remove them from the Green Belt clearly arose because the proposal at Area 6, if approved, would have isolated this area of Green Belt.

Failure of the Consultation Procedure

These changes were not properly consulted upon.

- The consultation procedure followed by the Vale was inadequate both in terms of the time and the manner in which it was conducted.

The time allocated did not allow the Parish Council sufficient time to consult with residents and it was only able to respond by holding an Extraordinary Council meeting.

The contents of the leaflet supplied by the Vale were profoundly unsatisfactory. It set out the Vale's case for building houses but failed to cover any of the surrounding issues nor did it mention that the Vale was consulting on a wider range of sites.

The leaflet did not make any explicit reference to the advice that the Vale had sought and received, nor did it state that the Vale was simultaneously seeking comments on its additional proposals to remove areas other than the Strategic sites from the Green Belt.

I conclude that the manner in which the Vale carried out its review was entirely unacceptable.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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 sites in the Oxford Green Belt that have been identified for housing should be withdrawn from the Plan.

All reference to the green belt review and its conclusions should be removed from the plan.

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Signature:

Date:

17th December
2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Dr Jane Impey

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

Paragraph

Policy

44

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☐

No

☐

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The comments in this section refer to the Vale Council's Core Policy 44: Landscape: Area of Outstanding Natural Beauty.

I fully agree with the comments made by CPRE.

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The sites proposed for house building in the AONB should be withdrawn and the total Plan reduced accordingly.

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Signature:

[Redacted Signature]

Date:

17th December
2014

