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 Our Ref East Challow  
 Your Ref Previous site 23  
 Date 19<sup>th</sup> December 2014

Dear Sir/Madam,

**Re: Representations to the Vale of White Horse Local Plan Part 1 – Submission Draft**

**Re: Core Policy 4 (East Challow)**

Within the consultation draft of February 2014 (Site 23) the attached area of East Challow was identified as appropriate for allocation of 200 dwellings, it was considered to be a sustainable location in this village that has been identified as a Local Service Centre. This proposed allocation has been deleted from the submission version of the Local Plan due to concerns about landscape impact and the consequent conclusion that it could not accommodate 200 dwellings.

This submission includes a draft layout which demonstrates the site area can accommodate 200 dwellings whilst retaining all existing landscape screening, existing trees and hedge planting plus additional areas of open space and structural landscaping. It is therefore being proposed in these representations that this site could and should be allocated through a modification to the plan as an alternative to less sustainable developments proposed in sensitive landscapes.

In view of the fundamental importance of the plan for the social, environmental and economic future of this area it is crucial that the plan as a whole, and by implication specific proposals within it, are in compliance with the soundness tests of Paragraph 182 of the NPPF:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. (Paragraph 182 NPPF)

### **Elements of the Current Plan are Unsound**

It is our belief that there are elements of the proposed plan which are unsound when considered against the tests set out in paragraph 182 of the NPPF. The allocation of the land at E Challow would go some way towards rectifying the problems identified.

These concerns relate principally to the requirement of the plan to identify developments which deliver adequate social and environmental infrastructure in sustainable locations and importantly, that are less sensitive than other available more environmentally sensitive alternatives.

### **Cooperation on Unmet Housing Need for Oxfordshire (Core Policy 2)**

There are serious questions about the Soundness of the plan in relation to its ability to meet the objectively assessed need for housing in the housing market area. Oxford City has made it clear that surrounding Districts will be required to take additional housing due to the City's inability to physically accommodate the requirements identified within the Oxfordshire SHMA. In this context additional housing within the District will be required, and in the short term the five year land supply requirement will be increased.

### **Proposed housing allocations within Greenbelt and AONB**

Of specific relevance to the Soundness of the plan is a Core Planning Principle within Paragraph 17 of the NPPF: 'Allocations of Land for Development should prefer land of lesser environmental value, where consistent with other policies in this framework.'

This core principle establishes with clarity that site allocation should be comparatively assessed. In paragraph 82 of the NPPF it is made clear that 'Once established greenbelt boundaries should only be altered in exceptional circumstances'.

In paragraph 115 of the NPPF the importance of the landscape of the Areas of Outstanding Natural is confirmed as having the highest possible status of protection, in National terms.

### **Allocations Inconsistent with National Policy & Unjustified (Core Policy 4)**

It is anticipated that the Inspector will receive a large number of objections to the proposed strategic housing allocations within the Oxfordshire Greenbelt and within the North Wessex Downs AONB. These objections will argue that such allocations are

fundamentally unsustainable and unjustified because they are unnecessary and as such they are contrary to Government Policy. It is not therefore considered necessary to repeat the detail of these objections in these representations.

### **Housing Supply Ring Fence (Core Policy 5)**

It is anticipated that the Inspector will receive objections to the proposed ring fence on the basis that this is an artificial way of seeking to isolate the rest of the District from the (obviously anticipated) potential failures to deliver houses within very large sites in a timely and effective manner. Officers have openly acknowledged that this approach has been borrowed from the neighbouring authority, South Oxfordshire District Council. That District has been able to isolate the housing delivery problems around Didcot from the rest of the rural area and so seek to avoid the consequences of Paragraph 14 of the NPPF. But SODC's sub area was agreed Pre-NPPF and based solely upon the now revoked South-East Plan Sub Regional Strategy. In the absence of high-level sub regional justification the housing supply ring fence is demonstrably contrary to the NPPF requirement that local plans should meet the full objectively assessed need for market and affordable housing in the housing market area. There is no evidence that the proposed ring fenced part of the district constitutes a distinct or identifiable housing market area. In this context suitable potential alternative smaller strategic allocations or 200 should be identified which are demonstrably deliverable early in the plan period.

### **Available Alternatives**

The Inspector is requested to consider whether the local plan can be deemed 'sound' when it relies upon the allocation of sites which are demonstrably of greater environmental sensitivity than available and deliverable alternatives in less sensitive landscapes in highly sustainable locations such as this land in E Challow.

### **Suggested Main Modification**

In view of the clear and compelling objections to several aspects of the plan, I would request that the Inspector proposes a Modification to delete all the greenbelt and Area of Outstanding Natural Beauty allocations and allocate land on unprotected landscapes, including 200 dwellings on this land at East Challow. This would assist in making the plan sound insofar as this new allocation would be both justified and consistent with national policy.

Ken Dijkman MRTPI