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**Subject:** Vale Local Plan

Response to Consultation on draft Local Plan Part One 2031

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Please note that while this is based on the CPRE response, as I thought their structure was extremely well considered, I have made many significant changes within the text and it is therefore a new contribution. Please also this should be considered a personal response from a local resident directly impacted by these proposals.

#### Objection to the draft Local Plan Part One 2031

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

My reasoning for this is explained below:

Core Policy 4 and its decedents, Core Polices 8, 13, 15 & 20:

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

The local plan is based on the forecasts of housing need from the Oxfordshire Strategic Housing Market Assessment (SHMA). This plan has received considerable criticism from the public, local politicians, our local Harwell councillors and the Campaign for Rural England. I have not discovered anyone that supports its conclusions. Given the lack of faith expressed by so many people in a position to know their facts, this discredited report MUST NOT be used as the basis for planning decisions. I understand that an independent critique of the SHMA has been commissioned by CPRE Oxfordshire concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. Strangely Vale officials appear to be either completely unaware of the doubts many have expressed over the SHMA, or are ignoring these criticisms as and there is no evidence that the Council has given them appropriate consideration. I would like to know which and why there has been no independent review commissioned on what is surely a subject vital to future planning. The major points are:

\* The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest

\* The SHMA makes many unsupported adjustments to official statistics in order to arrive at an estimate that exceeds Oxfordshire's requirements by over 20,000 homes

\* The forecast makes an assumption that 85,000 new jobs will be created. This figure is at the extreme end of optimism, it has not been subject to public consultation or to independent scrutiny.

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

The unquestioned adoption of the SHMA without commissioning further work on sustainability, infrastructure, environmental and social constraints before adopting the SHMA figures unquestioningly is likely to be subject to legal challenge. This issue has been handled astonishingly badly by the Vale. The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. Had this been done properly, the outrageous suggestion to put 1400 homes in the ANOB at Harwell would never have been made.

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.

My personal concern is over the retention of the North Wessex Downs Area of Outstanding National Beauty, as this is where I live.

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. This is not to say no to any development, but to propose 1400 new dwellings is to completely disregard the principles behind ANOB status.

The national planning policy framework puts AONBs in the highest category for landscape protection and affords them "great weight" in the decision-making process. The policy is crystal clear '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.' There are no exceptional circumstances here and it most certainly is not in the public interest. This is why in my opinion, any decision supporting this development will be called in, it will ultimately fail but during the process there will be a significant financial burden on Vale taxpayers through the Vale defending the indefensible. It would be much better for everyone concerned if the Vale were to swallow its corporate pride, accept it has made a mistake and withdraw this proposal now.

Core Policy 7 - Providing Supporting Infrastructure:

4. There is a lack of appropriate infrastructure to support the Plan as outlined. As a local resident who uses local roads, paths and facilities every day I can confirm that the existing infrastructure is already inadequate to cope with the existing population and employment. I cannot see how public services and infrastructure can possibly be improved within the timescales to meet such a great increase in demand. The proposals presented in the plan in my locality (Harwell) will do much to improve the current situation, but the capacity increase will be completely consumed by existing needs and it is doubtful they are sufficient for the planned developments in Didcot. I do not believe that Harwell 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.

Core Policy 4:

5. The consultation process has been exceptionally poor. The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and at the public meetings convened to discuss the plan. I therefore believe the Plan has not been positively prepared.

For the above reasons, I consider the Plan to be unsound because it is not justified by robust evidence.

Consequently, I request that much lower housing figures (based more closely on the Government's own household projections) should be used by the Vale in its Local Plan, and that the Inspector strikes from the Local Plan all site allocations in the North Wessex Downs

Regards

Dr Mike Willis