

Vale Local Plan
Response to Consultation on draft Local Plan Part One 2031

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Objection to the draft Local Plan Part One 2031

Please register this email as my objection to the draft Local Plan Part One 2031 on the basis that it is 'un sound'. Please find below my 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 its identity.

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

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

This plan is based on very high forecasts of housing needs from what I believe to be the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations such as CPRE and politicians. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be grossly overstated by a factor of over two.

From these criticisms I understand 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, these add over 20,000 houses to its forecast of need for Oxfordshire

Much of the forecast of need is based on another forecast that 85,000 new jobs will be created. However much of this seems also to be based on the questionable hope of aggressive economic growth. With the housebuilding rates which have not been subject to public consultation or independent scrutiny. I am not aware of any response to these criticisms or any independent review of the SHMA and there is no evidence that the council has taken this into consideration.

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

the SHMA says that it is just a starting point and only part of the evidence base for deciding housing need and that further work needs to be carried out to test if it can be sustainably accommodated before adopting it as a target. As far as I understand the Vale District Council did not attempt to undertake this work before adopting the figures, it should have assessed 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:

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. The plan has identified four development sites in the Green Belt, totalling 1,510 houses, and two in the AONB for 1,400 homes - this threatens to undermine the rural character of the Vale.

An additional 11 sites are proposed for removal from the Green Belt. My concern is that once this land is removed from the Green Belt it will be at immediate risk of development even if not immediately identified as a strategic site.

Green Belt

The 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 only be altered in exceptional circumstances.

Recent guidance, March 14 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 policy is therefore very clear. The fundamental aim remains to prevent urban sprawl.

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 - "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

4 There is a lack of appropriate infrastructure to support the Plan as outlined. I fail to see how public services and road infrastructure, which are already overstretched, can possibly be improved in the timescales to meet the huge increase in demand. The District will not be able to cope with this level of growth. I am hugely concerned about the environmental impact and therefore believe the Plan as it currently stands to be ineffective and unsound

Re: Core Policy 4

5 The consultation process has been 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. Therefore, I believe the Plan has not been positively prepared.

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

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

Celina Sykes