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**To:** <planning.policy@whitehorsedc.gov.uk>  
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**Subject:** 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

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

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

The SHMA is unsound and unsustainable and should not be relied upon. The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which 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 concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

From these criticisms we 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 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, we are not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration

The Vale District Council has failed to give proper consideration to the environmental and social constraints within the District: 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. As far as we understand, the Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first 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:

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. A further 11 sites are proposed for removal from the Green Belt. We are 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.

#### 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 be altered only in 'exceptional circumstances'.

Moreover, recent guidance (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.

#### 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. We cannot see how public services and infrastructure, such as the road network, which are already over-stretched in many places can possibly be improved within the timescales to meet such a great increase in demand. We do not believe that the District will be able to cope with this level of growth and we are very concerned about the impact it will have on the environment and the countryside. We therefore believe the Plan as it currently stands to be ineffective and unsound.

#### Re: Core Policy 4:

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. We therefore believe the Plan has not been positively prepared.

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

Consequently, we 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 Green Belt and North Wessex Downs.

Peter Lister & Rosalind Murrell