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| Vale of White Horse District Council | **Vale of White Horse Local Plan Part One: Strategic Sites and Policies**<br>Publication Stage Representation Form | **Ref:**<br><br>**(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*<br>**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 | Mrs | |
| First Name | Sue | |
| Last Name | Davies | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| Address Line 1 | 29 Ballard Chase | |
| Line 2 | Abingdon | |
| Line 3 | Oxfordshire | |
| Line 4 | | |
| Post Code | OX14 1XQ | |
| Telephone Number | [redacted] | |
| E-mail Address (where relevant) | [redacted] | |

# Part B – Please use a separate sheet for each representation

Name or Organisation :

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

| Paragraph | 5.39, 5.40, 5.42, 6.82, 6.108,6.111 | Policy | 13 | Proposals Map | 3 |
|---|---|---|---|---|---|

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.

**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.

There has been no 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 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. 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.

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.

**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 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.

**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.

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.

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**. I also request that the Inspector strikes from the **Local Plan** all site allocations in the Green Belt. An alternative site could be on land in South Abingdon which isn't Green Belt. I know this isn't being considered due to traffic congestion in South Abingdon, but if a new, much needed bridge could be built, this would help considerably!

***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 | **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: [redacted] Date: 13.12.2014