



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(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](mailto: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\*

*\*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

Mr

First Name

Christopher

Last Name

Bryan

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

5 The Winnyards

Line 2

Cumnor

Line 3

Oxford

Line 4

Post Code

OX2 9RJ

Telephone Number

Email address

(where relevant)

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

Name or Organisation : Mr Christopher Bryan

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

Paragraph  Policy  Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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.

These comments refer to Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 8, 13, 15 & 20.

### Unsoundness and unsustainability of Oxfordshire SHMA

- These policies are *unsound*. *There can be no presumption of 'sustainable development'* based on the exceptionally high forecasts of housing need proposed in the Oxfordshire Strategic Housing Market Assessment, which is itself unsound and unsustainable. The Local Plan policies are therefore *unjustified* and will be *ineffective* in achieving their desired outcomes.
- The Plan states that '*the housing target reflects the Objectively Assessed Need for the Vale of White Horse District as identified by the up-to-date Strategic Housing Market Assessment (SHMA) for Oxfordshire. The SHMA sets out how many new homes are required across Oxfordshire and for each district up to 2031.*' This statement is invalid: the SHMA figures are inflated and unsustainable, and do not in any way constitute an objective assessment of the housing needs of the Vale.
- I agree with the arguments presented by CPRE showing why the SHMA figures should properly be regarded as inflated and unsustainable.
- The SHMA relies on the Oxfordshire Strategic Economic Plan (SEP), to provide the economic base line and the associated adjustment for planned

jobs growth on which its predictions are based. The SEP has not been subject to public consultation or any independent scrutiny, and is therefore not an appropriate basis on which to make policy decisions.

- I understand that in a recent assessment of a SHMA in relation to a case in Leicestershire, Inspector Jonathan King questioned the adoption of *"aspirational employment growth"* figures put forward by the Local Enterprise Partnership and stated *"how essential it is that evidence such as SHMAs must be rigorously tested in order to establish that it is robust"*. The figures used for the Oxfordshire SHMA have not been subjected to any such a test.

#### **SHMA failure to meet the sustainability requirements of the NPPF**

- It is essential that plans are realistic but the Plan neither justifies the figures used nor explains how any shortfall would be ameliorated.
- I support the CPRE's conclusion that the Oxfordshire SHMA is utterly disproportionate and unrealistic.
- The NPPF requires the economic, social and environmental aims to be pursued 'jointly and simultaneously'.
- The SHMA is heavily influenced by the Oxfordshire SEP. Because this has not been subject to any public consultation, the growth targets have been effectively excluded from the local planning process, and there has been no opportunity to assess the economic, social and environmental aims.
- The risk of serious harm from over-allocation is great. Builders' preferences for greenfield land will lead to a more dispersed pattern of development, will put inappropriate pressure on rural Oxfordshire and will fail to encourage urban investment and regeneration. This will be damaging to Oxfordshire as an attractive business location and as a place to live. In particular, the damage to areas such as Cumnor will be irreversible
- The emphasis on new build means that the vast majority of new households cannot afford to buy or rent new houses at market prices. More thought should be given to changing current housing market and industry structures to provide genuine solutions to those in need of affordable housing.

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The SHMA figures should only be taken into account, alongside the figures derived from published government household projections thereby using the most probable values for all input parameters rather than extreme figures.

**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**, I do not wish to participate at the oral examination

☐

**Yes**, I wish to participate at the oral examination

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**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:

Submitted by e mail from the address in Part A

Date:

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

Name or Organisation : Mr Christopher Bryan

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

Paragraph

Policy

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

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.

These comments refer to the Vale District Council's use of the SHMA figures [Core policy 4: Spatial Strategy – see also core policies 7 (Infrastructure), 8, 15, 20 (sub-area spatial strategies)]

### Unjustified Prematurity

- The Vale District Council produced a Housing Update based directly and uncritically on the SHMA figures, before the full SHMA Report itself had been published. In so doing, it failed to meet the requirement of the NPPF for the social, economic and environmental elements of sustainable development to be considered together.
- The SHMA does not set housing targets. It provides an assessment of the future need for housing. Government guidance and advice is explicit that the SHMA itself must not apply constraints to the overall assessment of need, such as environmental constraints or issues related to congestion and local infrastructure. They are very relevant issues in considering how much development can be sustainably accommodated and where new development should be located.' Among the issues that were thus overlooked is the shortfall in existing infrastructure (for example in roads and education support) that calls into question the delivery of infrastructure to support the Plan.
- Had the Vale chosen to follow the conclusion of Mr Jonathan King (the Inspector at a recent Inquiry in Leicestershire) that it is necessary to test

SHMAs to ensure they are robust; it would have allowed an assessment of the interaction of economic, social and environmental considerations envisaged by the NPPF. It would also have provided an opportunity to test the overall level of housing provision to be planned for, taking account of environmental constraints and issues related to transport, school places, health provision and other necessary local infrastructure in considering how much development can be sustainably accommodated. Moreover, given the Government's repeated emphasis on the need to protect existing Green Belts and AONBs, the Vale could and should have used the prior review of the SHMA to reduce its housing target so as to avoid any incursion into these protected areas.

### **Impracticability**

- The comments about the lack of reality in the SHMA figures made under Core Policy 1 above apply with full force to the Vale numbers. The target construction figure looks inflated when set against the number of homes a year actually completed in the three years 2011-2014 (despite the easing of planning constraints introduced during the period by the implementation of the NPPF). The programme is over optimistic, although developers will secure the newly identified development sites with planning consent for construction, they will not complete houses if they cannot find purchasers for them.
- The Vale accepts that it cannot make up the backlog of the five-year housing supply within the time span, so it has subscribed to an economic plan that generates an implausible need for even greater construction. I do not accept that the Vale's apparent assumption that by adopting an over ambitious plan they will not be regarded as in default throughout the planning period when they fall short of their own, self-imposed target. A met credible target is the only way to avoid being in default.

### **Unsustainability**

- The National Planning Policy Framework identifies three requirements for sustainable development – economic, social, and environmental

#### *Economic*

- The NPPF requires plans to identify and coordinate development requirements, including the provision of infrastructure. The Plan identifies infrastructure requirements in its nominated sites, but offers inadequate assurance that they will be carried out in a timely and coordinated way. Indeed, at a Vale public meeting on the Housing Supply Update, Spring 2014, a senior councillor accepted explicitly that infrastructure would follow rather than accompany development and that there was a risk that this would lead to some degradation of services.
- Road capacity is a major case in point with well-documented overloading on the main roads in the District and on many of the minor roads at the points where they join them. To quote from the Oxfordshire Local Economic Partnership's SEP itself:

*“Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees.”*

- The recent announcement of £50m funding for improvements to the A34 is welcome, but it is widely recognised as a palliative measure for easing the pain of congestion. In the long-term there will remain capacity issues on

the A34 and much more substantial improvements will be needed in the long-term.

- Apart from the A34 and A40, there are major traffic problems on the A420, A338 and, on the A415 and the A417.
- The proposed improvements to access to the A34 through slip roads at Chilton and Lodge Hill and the doughnut roundabout at the Milton roundabout may make it easier to get on to the trunk road but ignore the fact that it is already grossly overloaded for much of the day.
- The Plan does not consider improvements to the A420. Oxfordshire County Council will not be finalising its A420 transport strategy until after the end of the Vale consultation period (19 December) and is reported as saying that the A420 'corridor issue' must be considered in partnership with Swindon Borough Council as together they 'own' the A420. Thus all the critical issues affecting the Western Vale Villages, i.e. infrastructure and housing numbers - will remain uncertain for months to come.
- There is a complete absence of reassurance about the availability of adequate medical support in any of the developments in the Plan (Infrastructure Delivery Plan para 11.3).
- The Vale appears to be relying on CIL funding to provide the necessary infrastructure. However the infrastructure needs to be provided in anticipation of the proposed developments. If the developments do not come forward on the timescale adopted by the Vale there will be a serious funding shortfall.
- The Plan implicitly acknowledges this fact when in Chapter 4 page 40 it writes *"If housing growth does not take place in the ring-fence area, Enterprise Zone and other business growth would be harmed and business prospects rates' contributions to infrastructure provision jeopardised."*
- Surprisingly having recognise this problem the Vale does not develop the point further.

#### *Social*

- I support the CPRE's comments concerning the social and environmental issues.

#### *Environmental*

- The NPPF requires plans to contribute to protecting and enhancing the natural, built and historic environment. The Update plans the piecemeal addition of houses on a number of green-field sites (many in places where they will permanently impact on the character of existing country villages), a major encroachment into the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and building on 4 areas currently classified as Green Belt. It also proposes to remove 18 other areas from the Green Belt that 'may be considered for development as part of preparing the Vale Local Plan Part 2' (Housing Delivery Update, February 2014, para.4.23). These plans demonstrate disregard for the environmental requirements of the NPPF and recent Government guidance (October 2014).

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.

No Plan should be approved until the NHS has provided the necessary assurance that appropriate medical resources will be provided.

Sites should not be included in the Plan unless the Vale is able to demonstrate that the infrastructure can be supplied in a timely manner.

The Vale should critically review the figures emerging from the SHMA to avoid the unsound aspects highlighted above, and to prepare an appropriately revised plan.

**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, 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:

Submitted by e mail from the address in Part A

Date:



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

Name or Organisation :Mr Christopher Bryan

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

No

X

*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.

These comments refer the Vale District Council's *Core Policy 13: The Oxford Green Belt*

### General comments

- The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts.
- Since the approval of the Oxford Green Belt in 1975, the Vale has been at the forefront of defending it against inappropriate development and protecting the unique character and landscape / rural setting of Oxford by preserving its openness. As a result, the Oxford Green Belt has stood the test of time and, in accordance with Government policy, the land has been kept permanently open and the countryside safeguarded from encroachment. This policy reflects deserved credit on the Vale Council.
- Paragraph 79 of the National Planning Policy Framework sets out Government policy on Green Belts:

*"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

- The Government's position on Green Belt policy 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.
- The extensive guidance provided by the Government that supports this conclusion is set out by CPRE in its submission.
- In the Plan the Vale proposes to remove 22 sites from the Green Belt. The proposal is against Government's aims, and would be unnecessary if the SHMA housing figure had been tested properly and reduced in the light of social and environmental considerations.
- The Council – and the Sustainability Assessment (SA) commissioned to underpin it – both fail to take proper account of the footnote to paragraph 14 of the NPPF on which the Government Guidance is based. The SA asserts in paragraph 11.8. 6 that the housing target was adopted because it meets the 'objectively assessed housing need in full, in accordance with national policy' without acknowledging the potential restrictions to that policy cited above. It fails to consider whether the Council should have tested the SHMA number against those restrictions. The sustainability assessment therefore wrongly accepts the inroads into the Green Belt as sanctioned by the NPPF, when they quite clearly are not.
- The plan is therefore unsound and unsustainable and should be annulled.
- More seriously even in areas such as Cumnor, where the immediate threat of a development of houses has been withdrawn, the Vale still proposes to go ahead and remove the areas from the green belt. **This would enable the Vale to sanction building in the current green belt as a two stage process: first remove the areas from the green belt then approve the developments**

### Green Belt Review

- It is generally agreed that a review of the greenbelt should normally involve the 5 affected Councils.
- I accept that under exceptional circumstances the Vale would be entitled to carry out a unilateral review. It cannot be too strongly stated that the circumstances surrounding the Vale's review do not meet those recognised by Government.
- It has now emerged that the Vale is currently involved in a general review of the green belt with other local councils. This cannot co-exist with the unilateral review that was conducted by the Vale. The latter review is therefore *ultra vires* and should be annulled.

### Cumnor specific comments

Eight separate sites are scheduled for removal from the green belt. It has proved impossible, given the presumption of the permanence of the green belt to determine why these areas were selected for removal from the green belt. The only guidance was an oral response to a question suggesting that to the Vale these changes 'rounded out' the built up areas and left the green belt looking more like a green belt. This does not seem to be an acceptable reason for removing areas from the green belt.

- It is unnecessary to understand precisely where the following areas are located: they serve only to underscore the lack of any acceptable logic in the Vale's approach.
- Area 1 (west of Tilbury Lane Botley Map). The Cumnor portion of this area was not sold because it is located directly under Oxford's 400kV electricity

supply line and consequently is unsuitable for development. It is also located next to the A420 which is heavily trafficked and the source of both noise, gaseous and particulate pollution.

- Area 2 is a recreation ground and contains a football pitch.
- Areas 1 and 2 are joined by a small copse and together form a welcome green spear. Their removal from the green belt would clearly serve no useful purpose.
- Area 3: any future development will significantly change the view of the Green Belt when travelling west on the A420.
- Area 4: is a contiguous part of the current Green Belt and its open vista is a major contributor to the views available of the Cumnor Conservation Area. It could not be developed in any way without jeopardising the purpose for which both the Green Belt and the Conservation Area was set up. This was initially recognised by the Vale's officers who said that as this area could not be built on there was no reason to remove it from the green belt. No reason was ever given for the subsequent change of view.
- Area 5 is a green area that reaches into the heart of the village and contributes greatly to the village nature of old Cumnor, which is the essential feature that the Conservation Area is designed to protect. The ground to the west is a sports field and recreation area owned by Cumnor Parish Council. This area too was originally recognised by the Vale's officers as offering no reasons for removal from the green belt. The subsequent change of view on this area was never justified.
- Area 6 was the area originally identified as being suitable for inclusion in the Vale's proposed building programme. The idea was subsequently dropped though the Area is scheduled to be removed from the green belt; The land involved is high quality agricultural land which includes a field with a Saxon pattern of ridges and furrows bordered by an ancient hedgerow. This parcel of land is of considerable heritage interest, located as it is close to the centre of Cumnor. It would be wanton vandalism to destroy this as part of a housing development.
- Area 24 is at the very centre of the Village and largely consists of the existing cricket ground and the grounds of Cumnor Place. As such it is said to contain the remains of the largest unexcavated Elizabethan garden in England. The proposal to remove them from the Green Belt clearly arose because the proposal at Area 6, if approved, would have isolated this area of Green Belt.
- The eighth Area is in Farmoor and appears to have already been built up.

### **Failure of the Consultation Procedure**

These changes were not properly consulted upon.

- The consultation procedure followed by the Vale was inadequate both in terms of the time and the manner in which it was conducted.
- The time allocated did not allow the Parish Council sufficient time to consult with residents and it was only able to respond by holding an Extraordinary Council meeting.
- The contents of the leaflet supplied by the Vale were profoundly unsatisfactory. It set out the Vale's case for building houses but failed to cover any of the surrounding issues nor did it mention that the Vale was consulting on a wider range of sites.

The Vale missed clear opportunities to draw this wider consultation to the attention of residents:

- The leaflet did not make any explicit reference to the advice that the Vale had sought and received, nor did it state that the Vale was simultaneously

seeking comments on its additional proposals to remove areas other than the Strategic sites from the Green Belt.

- No mention of the extended consultation was made at the meetings which the Vale called to launch the Strategic Housing Consultation process.

**The inescapable conclusion is that the manner in which the Vale carried out its review was entirely unacceptable.**

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.

The sites in the Oxford Green Belt that have been identified for housing should be withdrawn from the Plan.

All reference to the green belt review and its conclusions should be removed from the plan.

***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.***

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Signature:

Submitted by e mail from the address in Part A

Date:

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

Name or Organisation : Mr Christopher Bryan

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

Paragraph

Policy

47

Proposals Map

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.

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The comments in this section cover *Delivery and Contingency* in the Vale Council's *Core Policy 47 and Appendix H*

- The Vale's contingency planning is inadequate. It assumes that the rate of house building falling behind programme is the only problem likely to occur. Therefore the only solution offered is to remedy the problem via planning means. This is unsound. If jobs lag behind forecasts, the developers may delay the pace of construction which in turn reduces the rate at which CIL and Section 106 monies will become available. The necessary infrastructure and affordable housing can only be provided if the planned rate of construction and associated sales can be achieved and maintained. The Plan does not explain how this fundamental difficulty could be overcome.

### The absence of 'reasonable alternatives' (Paragraph 1.25)

- The Council asserts that it has tested its preferred solution, as required by the NPPF, against 'reasonable alternatives'. The alternatives in question are programmes of house building explored in the Local Plan 2029 Part 1. But those alternatives applied before the publication of the SHMA and are now completely irrelevant. They cannot therefore be described as

'reasonable' and need to be replaced.

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The Plan should be amended to provide:

- for at least biennial confirmation that the expected economic and population growth forecasts are on track
- the capability to amend the programme in the light of these conclusions.

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