

Draft Revised Statement of Community Involvement (SCI) 2020-2024

APPENDIX 1 TO THE CONSULTATION REPORT

Appendices A – D for the draft revised Statement of Community Involvement 2020-2024 consultation report. The full report and appendices are available on the consultation pages on [our website](#).

DECEMBER 2020

In this document:

APPENDIX A – CONSULTATION COMMUNICATION

APPENDIX B – SURVEY

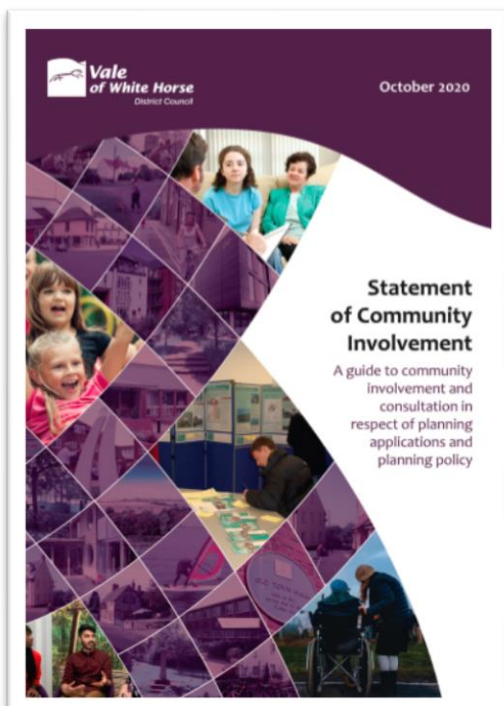
APPENDIX C – DEMOGRAPHIC DATA

APPENDIX D – FULL LIST OF COMMENTS RECEIVED

In a separate document: **APPENDIX 2**

SUMMARY OF CONSULTATION RESPONSES

A summary of the consultation responses received, and the proposed changes taken forward within the SCI as a result of the consultation responses, is available as a separate document, in Appendix 2 (prepared for Cabinet).



A draft revised SCI document for 2020-2024 was prepared for the consultation. Following feedback, the SCI has been updated (left) and is available from the SCI page on our website.

APPENDIX A – CONSULTATION COMMUNICATION

A copy of the email notification sent out to consultees is below. The text was adapted for the letter sent to those who opted to receive postal notifications.

Subject: Your comments are invited on the draft Statement of Community Involvement

Dear [NAME]

We are asking for comments on the draft Statement of Community Involvement (SCI), which sets out how we aim to engage with and involve our communities in respect of planning applications and planning policy. We are committed to working in a clear and transparent way and are keen to assist anyone who may wish to get involved in the planning process.

We previously adopted the SCI in 2016 and this updated document will replace that version. Once adopted we must comply with the new SCI in preparing any plan-making document or when determining a planning application.

The draft SCI is subject to public consultation for a six-week period from **Thursday 27 February to 5pm on Thursday 9 April 2020**.

Before completing the survey please visit our website and read through the [draft Statement of Community Involvement](#).

A hard copy is also available to view and in alternative formats (for example large print, Braille, audio, email, Easy Read and alternative languages) on request, at the Vale of White Horse District Council office, 135 Eastern Avenue, Milton Park, Abingdon, OX14 4SB between 8.30am and 5pm Monday to Thursday and 8.30am and 4.30pm on Fridays.

The draft SCI document is also available to view at the following local libraries, who can provide free access to the online documents:

Abingdon Library
Botley Library
Didcot Library
Faringdon Library
Grove Library
Kennington Library
Wantage Library
Westgate Library, Oxford

You can find the addresses for the above libraries using this link to the county council website.

How to comment

To give your views on the draft Statement of Community Involvement we encourage you to use the online survey [SURVEYLINK]

This link is uniquely tied to this survey and to your email address. If you would like to forward this message to any interested parties please refer them to our [website](#) where there is a public link to the survey.

Responses can also be made:

- via email to planning.policy@whitehorsedc.gov.uk, or
- via post to Planning Policy, Vale of White Horse District Council, 135 Milton Park, Milton, Abingdon, OX14 4SB.

If you are responding as an individual, you are not required to provide your name or contact details. Any personal information you provide to the council within your comments that could identify you will not be published in the summary report. If you are responding on behalf of an organisation or agent, we ask you to provide its name - the summary report will include this information. Further information on data protection is available in our general consultations [privacy statement](#).

After the consultation period ends, we will consider your comments and make appropriate changes to the SCI before we adopt it. Once adopted, the revised SCI, along with a feedback summary report, will be published on our website.

Kind regards

Adrian Duffield

Head of Planning

Vale of White Horse District Council

Opt out: If you do not wish to receive further emails from us like this, please click the link below, and you will be removed from our consultation mailing list. Please note, we may still need to contact you for certain consultations if we have a legal obligation to do so.
<http://survey.southandvale.gov.uk/s/Remove/>

APPENDIX B – SURVEY

A copy of the paper comment form is below; it is based on the online survey.

Draft Statement of Community Involvement Consultation comment form

Vale of White Horse District Council has updated the Statement of Community Involvement (SCI). The SCI sets out how we aim to work positively and proactively with local communities.

We are committed to working in a clear and transparent way and are keen to assist anyone who may wish to get involved in the planning process. We aim for communities to be informed and have timely and meaningful opportunities to have a say on any proposals we make.

We previously adopted an SCI in 2016 and this updated document will replace that version. Once adopted we must comply with the new SCI in preparing any plan-making document or when determining a planning application.

We are inviting your comments on the draft Statement of Community Involvement from **Thursday 27 February until 5pm on Thursday 9 April 2020**.

Before completing the survey please visit our [website](#) and read through the [draft Statement of Community Involvement](#)

If you have any questions on the SCI, please contact the planning policy team on planning.policy@whitehorsedc.gov.uk or call 01235 422600.

If you have any questions on the survey or require it in an alternative format (for example large print, Braille, audio, email, Easy Read and alternative languages) please email haveyoursay@southandvale.gov.uk or call 01235 422425.

Personal details?

If you are responding as an individual, you are not required to provide your name or contact details. Any personal information you provide to the council within your comments that could identify you will not be published in the summary report. If you are responding on behalf of an organisation or agent, we ask you to provide its name - the summary report will include this information. Further information on data protection is available in our general consultations [privacy statement](#).

Next steps

After the consultation period ends, we will consider your comments and make appropriate changes to the SCI before we adopt it. Once adopted, the revised SCI, along with a feedback summary report, will be published on our website.

A save and continue option is available so that you can come back to a partially completed survey. On clicking "Next Page" you confirm you are happy for your response to be used in the consultation analysis and results. Your responses may be included as valid answers, even if you do not click "Submit" at the end of the survey.

The SCI is made up of three sections:

Section 1: Shaping our Future

Section 2: Community Involvement in the preparation of the Local Plan and Planning Policy

Section 3: Community Involvement in Planning Applications

We would like to hear your views on the SCI. You can provide your comments below.

Section 1 of the SCI provides information on the council's overall approach to community engagement and involvement in the planning process. Draft SCI Do you have any comments on Section 1: Shaping our Future?

You can upload supporting evidence here.

Choose File

Section 2 of the SCI provides information on how to get involved with and influence the council as we prepare the Local Plan and other planning policy documents. Draft SCI Do you have any comments on Section 2: Community Involvement in the preparation of the Local Plan and other Planning Policy documents?

You can upload supporting evidence here.

Choose File

Section 3 of the SCI provides information on how to become involved with planning applications. Draft SCI Do you have any comments on Section 3: Community Involvement in Planning Applications?

You can upload supporting evidence here.

Choose File

Do you have any comments on the general format of our SCI? Is it clear and suitable for your needs? Draft SCI

Do you have any other comments on our SCI?

If you wish to provide evidence and any supporting documents to support or justify your comments, you can attach them here.

Choose File

To what extent do you agree that the SCI will enable communities to be informed and have timely and meaningful opportunities to have a say on any proposals we make?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree
- Don't have a view

9. Equalities

We are committed to making sure that residents have equal access to services. Please help us to keep track of how successfully we are achieving this by ticking the appropriate boxes below. All information is confidential and will only be used to help us monitor whether views differ across communities and to inform our equalities practice.

Which of the following describes how you think of yourself?

- Male
- Female
- In another way
- Prefer not to say

How old are you?

- 15 and under
- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75+
- Prefer not to say

We want to provide a service that meets the needs of all of our residents. Have you experienced any difficulties engaging with planning as a result of the following? Tick all that apply.

- Age
- Disability
- Ethnicity
- Gender
- Gender reassignment
- Religion or belief
- Sexual orientation
- No problems experienced with this service

If you have experienced difficulties with planning consultations, please tell us below what happened so we can seek to address issues in any further planning consultations. Please provide your email address or phone number if you would like us to get in touch with you to follow this up.

Are you completing this form as an: *

- Individual
- Organisation
- Agent

11. Your details

If you are responding as an individual, you are not required to provide your name or contact details. Any personal information you provide to the council within your comments that could identify you will not be published in the summary report. If you are responding on behalf of an organisation or agent, we ask you to provide its name - the summary report will include this information. Further information on data protection is available in our general consultations privacy statement.

Title	<input type="text"/>
Name	<input type="text"/>
Job title (if relevant)	<input type="text"/>
Organisation (if relevant)	<input type="text"/>
Organisation representing (if relevant)	<input type="text"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Postal town	<input type="text"/>
Postcode	<input type="text"/>
Telephone number	<input type="text"/>
Email address	<input type="text"/>

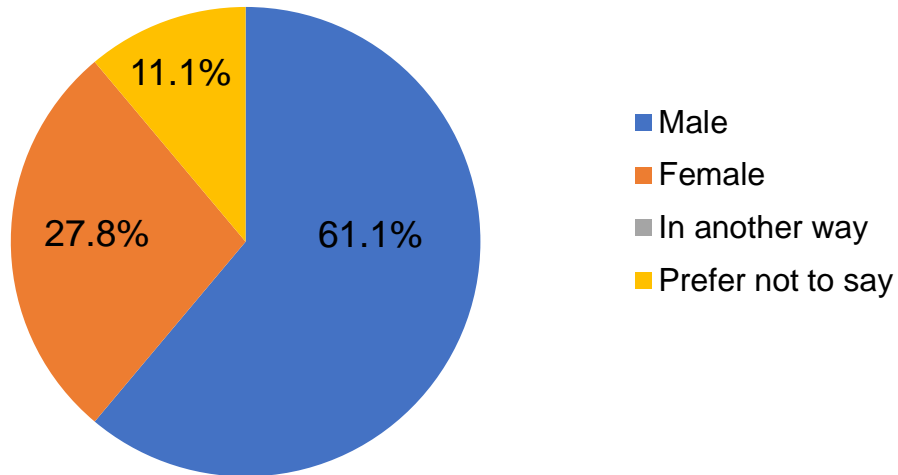
How did you find out about the Statement of Community Involvement consultation? Tick all that apply.

- Email
- Parish Council
- District Council
- Poster
- Twitter
- Facebook
- Newsletter
- Word of mouth
- Other (please specify):

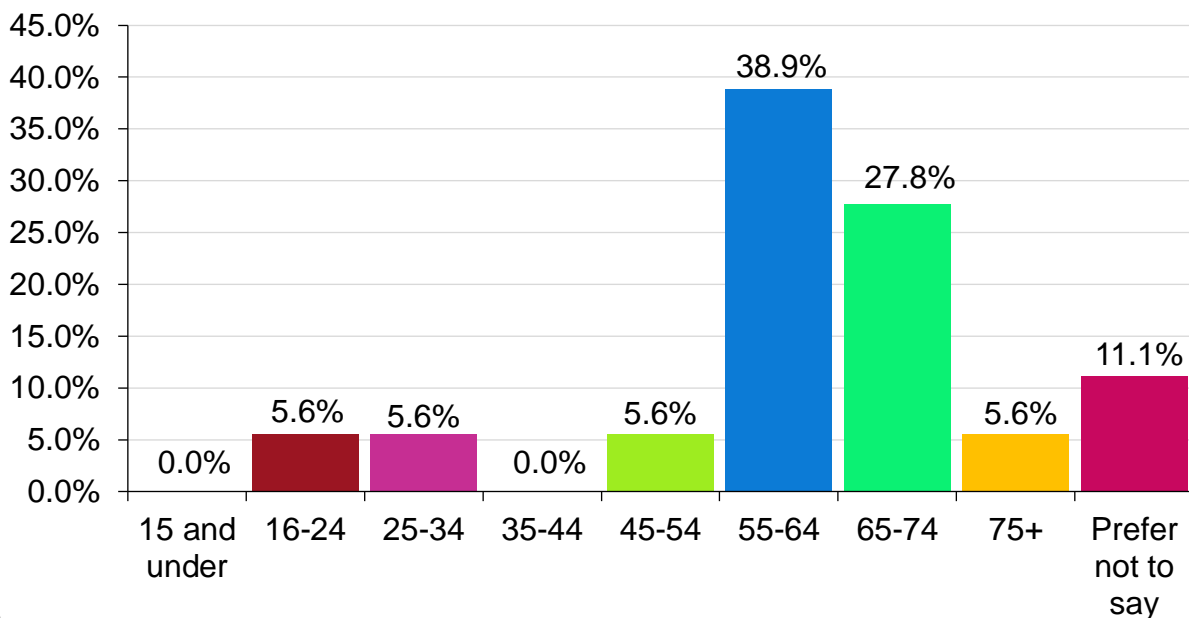
APPENDIX C - DEMOGRAPHIC DATA

Below is all the demographic data collected in the consultation.

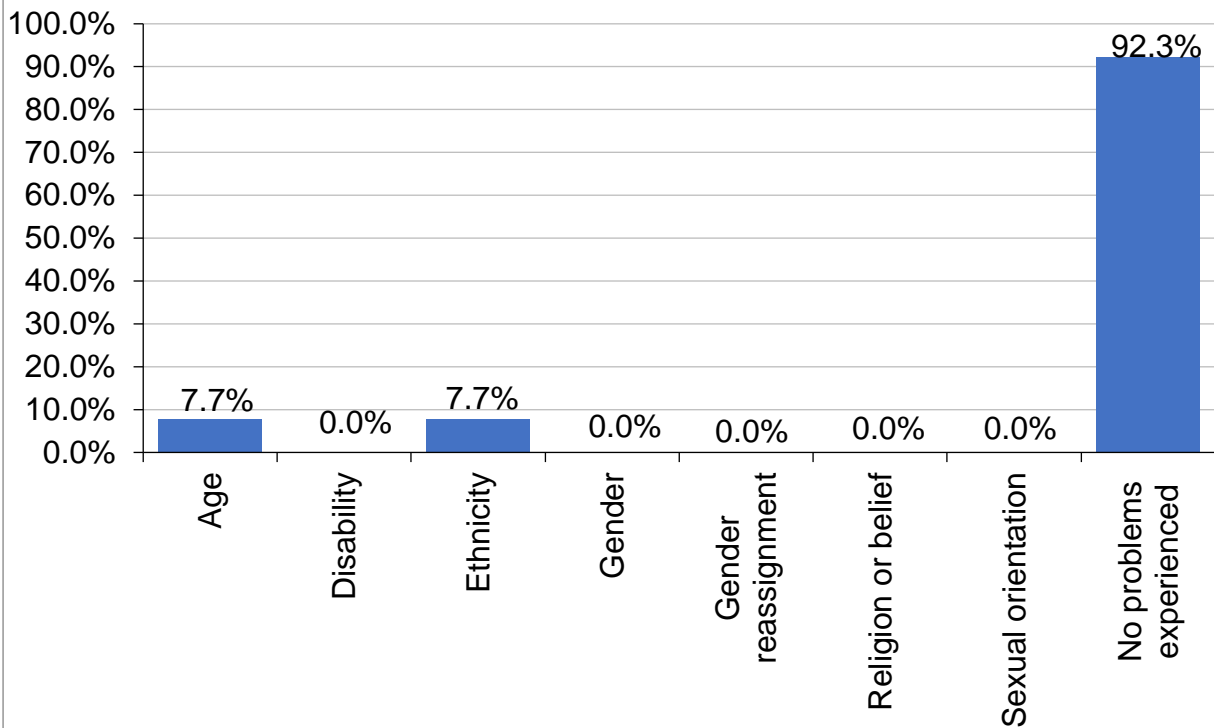
Which of the following describes how you think of yourself?



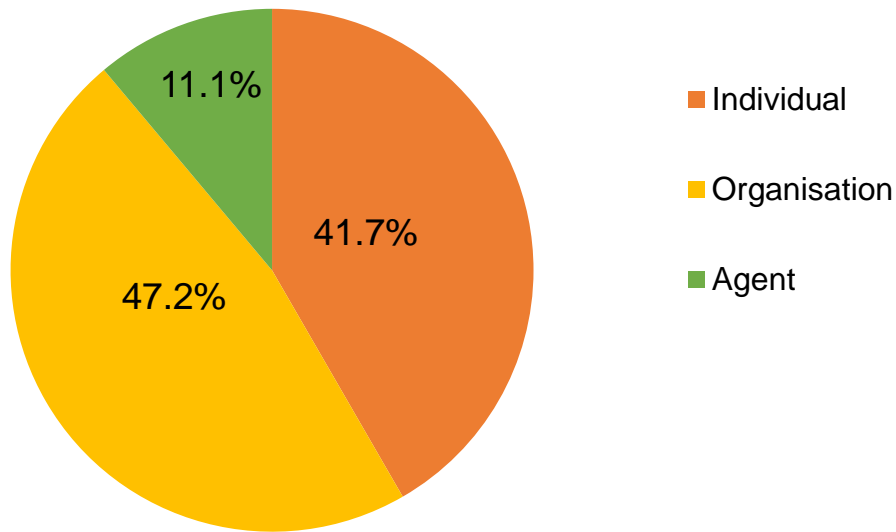
How old are you?



We want to provide a service that meets the needs of all of our residents. Have you experienced any difficulties engaging with planning as a result of the following? Tick all that apply.

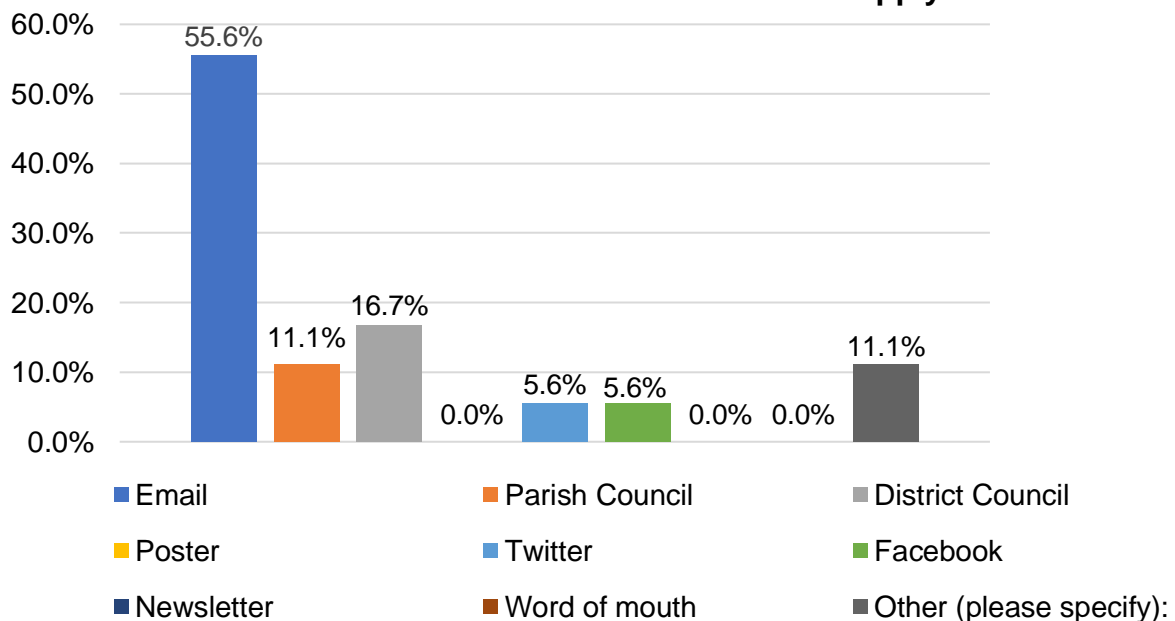


Are you completing this form as an:



We also asked respondents to tell us how they heard about the consultation, to help us plan how we contact people and ensure that we offer a wide variety of ways to get involved.

How did you find out about the Statement of Community Involvement consultation? Tick all that apply



Other (please specify):

Oxford Mail
Oxford Times

APPENDIX D – FULL LIST OF COMMENTS RECEIVED

A full list of comments raised in their original form can be found below. Please note, the following comments are taken as written and are unedited, which means they are a true reflection of the submission but may include spelling, grammatical and punctuation errors.

Section 1 of the SCI provides information on the council’s overall approach to community engagement and involvement in the planning process

Below are the comments received to the question:
Do you have any comments on Section 1: Shaping our Future?

1	ID: 136734703	The Vale of White Horse District Council does not have a good record on consultation issues and needs to try harder. I was consulted as a Council Tax Payer on the viability and feasibility of the 5 District Council Partnership Contract. As a previous senior officer of a local authority with many years experience of contracting out services I strongly advised against such a proposed nonsense. The VWHDC ignored my advice and the result was a shambles that has cost the DC a considerable sums that it can ill afford. Conclusion do not consult just to tick a box and ignore and responses received.
2	ID: 136739516	No
3	ID: 136741848	Pointless document/process when planning decisions are effectively taken by unelected bodies with token membership from councils who spinelessly fail to uphold the well being of the existing communities they are paid to serve and simply chase government funding for work only necessary to support personal agendas and ambitions (and then get well paid jobs with them when their local government time is up, despite clear conflict of interest...) No point in any public consultation when decisions are made outside the democratic process, please save the money and let Oxford University cash in on it's land banks as they feel fit, regardless of the public good...
4	ID: 136742922	You make the whole process quite inaccessible for people without an intimate knowledge of planning
5	ID: 136751154	Yes. The most important part of you involving the community is to LISTEN and ACT. I would like this to be more clearly spelled out than the somewhat woolly approach and mealy words. All Vale residents want is to be heard and their views respected. All too often views are heard, but they are often ignored.

6	ID: 136747636	<p>This document in it's entirety is 41 pages long... most "normal people" (without direct experience of local government or the planning process) will skim and probably give up.</p> <p>Normal people want to know:</p> <p>1:How to access applications</p> <p>2: How to respond to applications</p> <p>3: In simplistic terms, what are grounds for objection, and conversely what would not be deemed appropriate under planning law.</p> <p>As a framework, residents want to know:</p> <p>1: What applications are VWHDC vs OCC as planning authority.</p> <p>2: What happens when large applications opposed by residents and regulatory bodies get approved. Who appeals and why VWHDC allows large developers to run roughshod over them with regards to planning conditions etc.</p> <p>3: Why large developments (as part of or prior to the local plan) are given approval without supporting infrastructure being in place.</p>
7	ID: 136784552	<p>I am sure that you will regard the following as nit-picking or trivial. However, whilst each comment may be seen that way, the overall aim is to highlight the lack of attention to detail shown by the authors. Having the document proof-read would, I suggest, be a minimum requirement. If you cannot be bothered to expend any effort on this, what expectation should we have of your efforts in the remainder of the document?</p> <p>Your very first comment on consultation principles, on Page 5, says "keep the process simple by writing our documents in plain English....."</p> <p>Notwithstanding the content or intent of those principles, the use of English fails in a number of areas;</p> <p>Page 5: "Early Involvement" - 1st bullet says "...earliest...", it should say "...earlier..."</p> <p>Page 5: "Early Involvement" – As you have not followed the format used in other points (starting each section with "We will;") the 2nd bullet is an incomplete sentence</p> <p>Page 5 "Inclusive of all" – You end the statement with a preposition. Better usage would be "other groups in the community, of which we become aware"</p> <p>Page 5 "Recognizing the needs of different groups" – you say "support local communities who wish to prepare Neighbourhood Plans for their area," – the use of "for their area" is tautology as it is highly unlikely that "local communities" would prepare plans for other areas</p> <p>Page 5 "Recognizing the needs of different groups" – you say "hold events or meeting in accessible locations" – meeting is singular and should be plural</p>

		<p>Page 5 “Making access to information easy” – you say “make our planning documents, background studies and responses to consultations are readily available” – either the word “are” is superfluous or you have missed out the word “sure” between the first two words of the sentence. Currently, the sentence is gibberish</p> <p>Throughout the principles, you demonstrate inconsistent use of “e.g.” and “for example” – choose one and stick with it.</p> <p>I will not go into the use or misuse of punctuation.</p> <p>I acknowledge that your stated aim is to use “plain English”, not “good English”</p> <p>Aside from the above, more material comments are:</p> <p>Page 5: “Providing feedback and sharing information” - you say “use such as the results from previous consultations”. Do the results of such consultations have a fixed validity period? People’s views may have changed and the results, therefore, no longer be valid</p> <p>Paragraph 3.3: - you say “Requests for printed copies of the documents may carry a printing and administration charge” – is there a fixed range within which you can charge? Or do you have carte blanche to charge whatever you deem appropriate?</p>
8	ID: 136806533	no comments.
9	ID: 136870611	<p>There is little point in continuing with this exercise as a general rule the public are ignored and their opinion over-ruled, the Morland garden development was a classic example of this when a huge majority of Abingdon residents voted against it including all our Councillors and MP, a public event against the proposal was organised and attended by them too, however, all of their protests were over-ruled by a single Councillor who didn't even represent anyone in the this area, I refer to Cllr Nimmo of Henley who over-ruled everyone and allowed it to go through, the upshot of which is that Abingdon is now grid-locked, as predicted by the protesters.</p>
10	ID: 136876439	<p>it is noted that that the LPA will ""Have in place effective mechanisms for documenting views and clear feedback mechanisms to demonstrate how the views of the community have influenced and benefited the plan.""</p> <p>These mechanisms are not described and should be.</p> <p>For a lay person reading the information it would be very confusing as there is so much planning jargon.</p> <p>In the section Recognising the needs of different groups - there should be a forum for local planning, architectural and development groups that regularly use the service. You should identify the more regular users and work with them.</p>

11	ID: 136960581	Unable to read content on right side of this document as set outside margin. Please reissue. Partly corrected when section 2 document opened from link.
12	ID: 137032921	Expand and improve the greenbelt
13	ID: 137060484	Community involvement does not often include the more vulnerable individuals in the Community...there are many individuals, who do not belong to local groups ,with worries and concerns and needs which they feel embarrassed to share with the Parish Council or village organisations. The elderly living on their own and the young often think whatever they feel about their environment and proposed changes , as individuals they have no influence on what happens so why bother.
14	ID: 137169359	My experience has been with the West Way Shopping Centre redevelopment. The Vale website was very difficult to use. It was time limited, and would have been impossible for older users with little website familiarity.
15	ID: 137186858	No.
16	ID: 137428974	Content with this section. Perhaps clarify role and engagement of individuals as stakeholders vs organised bodies?
17	ID: 136738510	You don't say *how* you are going to engage with the local community (what methods of communication), nor show any recognition of present weaknesses in such methods and what you might do to improve this. Clear language and accessibility is all very well, but if the channels themselves are weak, it is all pointless.
18	ID: 136812004	It seems clear. One of the issues with putting things out for public approval is that if you steer the questions appropriately it is pretty easy to get an answer you want. IN this case approval of this paper.

Section 2 of the SCI provides information on how to get involved with and influence the council as we prepare the Local Plan and other planning policy documents.

Below are the comments received to the question:

Do you have any comments on Section 2: Community Involvement in the preparation of the Local Plan and other Planning Policy documents?

1	ID: 136734703	See response to Section 1.
2	ID: 136739516	No
3	ID: 136741848	<p>Pointless document/process when planning decisions are effectively taken by unelected bodies with token membership from councils who spinelessly fail to uphold the well being of the existing communities they are paid to serve and simply chase government funding for work only necessary to support personal agendas and ambitions (and then get well paid jobs with them when their local government time is up, despite clear conflict of interest...)</p> <p>No point in any public consultation when decisions are made outside the democratic process, please save the money and let Oxford University cash in on it's land banks as they feel fit, regardless of the public good...</p>
4	ID: 136742922	More details on how you involve the community rather than neighbourhood plan consultations which are difficult to understand - maybe you need to do an online video and explain to people in easy to understand language in less than 2 minutes
5	ID: 136751154	I would like the Planners to undertake a mandatory poll of residents for large schemes. It can be online. Putting up laminated notices of planning applications on gates and telegraph poles is also an outdated and pointless exercise. Most villages and communities have Facebook or websites couldn't you use these more effectively?
6	ID: 136784552	Paragraph 13.6: - you say "We may seek to extend our consultations in certain circumstances" – two questions, firstly, "seek to extend" suggests you need approval from one or more other bodies – who are they? Secondly, why is it that you say "may seek to" rather than merely say "will"? Are there times when public holidays etc will not result in an extended period?
7	ID: 136806533	no comments.
8	ID: 136870611	There is no point, you don't listen! what's happening to Old Abbey House? The Upper Reaches site, the Diamond interchange? etc etc.

9	ID: 136876439	It all seems a little 'we are here and documents are here - come to us'. There needs to be more going out into the communities and finding out their needs and concerns. Well designed focus groups would help in gaining the views of local groups.
10	ID: 136960581	<p>1) No page numbering. 2) Page 6 incomplete, Page 15? relating to SA & SEA incomplete. 3) Page 17? below item 11.23 incomplete. 4) Page 18? incomplete. 5) Page 20? incomplete below item 11.36 diagram. 6) Page 21? incomplete. 7) Is Page 22? complete? stops as item 14.5. 8) PAGES 23 to 28, 32, 33 to 39 incomplete.</p> <p>PLEASE REISSUE ALL PAGES.</p>
11	ID: 137032921	Be ambitious for the greenbelt
12	ID: 137060484	<p>7.1 where and when development takes place...strategic sites and policies especially in a village or hamlet. 8.1 duty to cooperate , development of land. Once land has been identified as being 'useful' for house building there seems to be a move to find as many places as possible to build more and more and to saturate villages and flood communities and instead of keeping an eye on what the new builds are destroying at the same time as fulfilling the Council' s obligation to build 100s of houses each year the older people , often living on their own , have no one to help them to voice their concerns. At a stroke , isolation and loneliness and helplessness hides behind closed doors. 9.1 to learn what is and what isn't successful when engaging with our communities.. the older person on their own with no transport , on a limited and fixed income , relying on a bus service which cannot be accessed because it means crossing a dual carriageway...if they want to write to the Planners they expect to hear back and have their concerns acknowledged but feel it will do no good at all. Consultees.... 10.2 to 'understand who we need to talk to in the local community to ensure that we consult in the most effective way ''groups' but where are the individuals ? Teenagers who want to catch a bus but there is no footpath or lighting, 3 right angled bends, and three quarters of a mile to the nearest bus stop. The young mum with 6 bags of shopping can't afford the local shop so relies on friendly passing drivers for a lift back to the village in the pouring rain -she lives in affordable or assisted housing but has no transport of her own .</p>
13	ID: 137169359	Everybody was well involved. But the overwhelming objections to the West Way redevelopment were ignored. Local Plans and guidance for development were ignored. I concluded that getting involved in drafting Local Plans is a waste of time.

14	ID: 137186858	No.
15	ID: 137428974	Content. Our experience of creating a neighbourhood plan and its relationship to the Local Plan was good.

Section 3 of the SCI provides information on how to become involved with planning applications.

Below are the comments received to the question:

Do you have any comments on Section 3: Community Involvement in Planning Applications?

1	ID: 136734703	See response to Section 1.
2	ID: 136739516	No
3	ID: 136741848	<p>Pointless document/process when planning decisions are effectively taken by unelected bodies with token membership from councils who spinelessly fail to uphold the well being of the existing communities they are paid to serve and simply chase government funding for work only necessary to support personal agendas and ambitions (and then get well paid jobs with them when their local government time is up, despite clear conflict of interest...)</p> <p>No point in any public consultation when decisions are made outside the democratic process, please save the money and let Oxford University cash in on it's land banks as they feel fit, regardless of the public good...</p>
4	ID: 136742922	No
5	ID: 136784552	<p>Page 23 – Step 2: - you do not mention the posting of planning application notices on or near the proposed development site (on telegraph poles, gates etc) but it is mentioned later in the document (in the table at paragraph 21.1) - should it also be covered here? Also, where a planning application is amended, do you post a revised notice?</p> <p>Page 23 – Step 5, Bullet 2: you say “we will usually re-consult anyone who responded” – why is it not mandatory that such respondents are advised of amended submissions? The amendments may materially affect to respondent’s comments.</p> <p>Section 27 – whilst I understand that the determination as to who may appeal a planning decision is set out in regulations and, therefore, not within your purview, it is nonetheless wrong. Opportunity to appeal should also be available to opponents and, if you are consulted on any review of this point, I should appreciate my view being put forward.</p> <p>The Planning Enforcement section seems somewhat pointless. It suggests that an applicant may chose to ignore planning constraints and then merely submit a retrospective request for whatever unilateral action they have taken. Or, the planning authorities simply chose not to bother to enforce a planning</p>

		decision. If that is the case, why bother with the planning process in the first place?
6	ID: 136806533	No comments.
7	ID: 136870611	Your planning officers are obliged by law to uphold and deliver on planning policy and procedures but time and again they're seen to ignore all rules & regulations and allow shambolic building work to take place that flies in the face of legislation. Policy should be that any application that attracts more than two objections should automatically be called to committee, but in reality this never happens, the upshot of this failure is more non compliant builds that make for unpleasant environments and more often than not neighbourhood disputes
8	ID: 136876439	Where is it describe that the LPA need to address the need for schools, local infrastructure, hospitals. I have not seen a Local Plan that focussing on those needs - most are on housing needs. The Planning Service should be developing 25yr plans for growth in the economy and the necessary infrastructure. While the responsibility for those items are under other departments there are inseparable. More joined up approach need to balance housing growth with the required support services.
9	ID: 136960581	AS COMMENTS UNDER SECTION 2. PLEASE REISSUE ALL PAGES.
10	ID: 137032921	More green spaces, easily accessible
11	ID: 137060484	10.4 site testing on a comprehensive basis. To fulfil house building there seems to be no concern about safety on adjacent trunk roads which have the bus routes to towns/ villages . Does the Planning authority pretend to be someone living in a home in the middle of a field designated for building and wonder how the person living there could get to work or hospital or shops when there is no car, bike is not suitable with young children , they have no one they know to call on ? How does one actually live in a new home ? On their own or not. 11.24 Community Right to Build Order. 'A route to encourage development , allowing communities to decide for themselves what to build - eg community facilities and affordable housing..... ' There is no mention of building for the older person / persons who wish to stay in a community where they have lived for over 30 years , who occupy a home in which a family could easily be accommodated ...no U shaped cul-de-sac for half a dozen purpose built 2 bed bungalows or pavement wide enough for an electric scooter ...housing for the young, three storey properties, but where do the older people go ? Again , many older people are unable to have their opinions taken into account , and if they do have any family (which is usually not the case) moving in with relatives is simply not an option. 'Community Infrastructure ' 11.29 'levy financial contributions from developers on new development ' 11.30 ' money raised will help fund major infrastructure projects which will benefit the wider district along with individual projects within Towns and Parishes.' In my rural locality we need to have a major look at the increase in traffic

		<p>problems along the A420. New Building in villages along this trunk road has suddenly increased the volume of traffic such that apart from midday and night time it is usually impossible to be able to drive near the speed limit given . On those stretches of dual carriageway near villages and hamlets it is impossible to cross the road safely from/to a bus stop. Someone had to be killed before an island was created by the Greyhound pub at Besselsleigh . Can the local residents of the A420 , not the Parish Councils, be told why the moneys talked about in the 11.29 and 11.30 above can't be used to create a crossing by the Appleton/Oaksmere turn for the bus stop and the Fifield turn nearer to Kingston Bagpuize for their bus stop (the underpass being totally unusable) even and despite it being a Trunk Road and not under the auspices of the Vale?</p>
12	ID: 137169359	<p>If the DC does not listen to the community's objections, involvement is not a productive use of time.</p>
13	ID: 137186858	<p>Major Applications: It would be helpful if there were a separate category for applications for either more than 49 homes or more than 4,999 square metres of gross floor area. Such applications are much more likely to result in substantial improvements to highways and alterations to bus stops and bus services. Therefore such applications are much more likely to be of interest to my organisation (Oxfordshire Transport and Access group) than smaller Major applications.</p> <p>The gross floor area: does that include the interiors of buildings only, or does it include surface car parks and other parts of development apart from buildings?</p>
14	ID: 137428974	<p>The planning application process is clear and logical. We welcome the inclusion of pre-app advice to the web document set. We have experienced cases where additional information from the applicant and/or advice given during Step 5 has not been made public. In order to ensure transparency this should be made public and the opportunity to comment by the parish council given (in our experience, some of the additional advice given has been 'economical with the truth!').</p>
15	ID: 137175274	<p>How do officers decide whether comments on an application are valid for consideration?</p> <p>How do officers and the Planning department feed comments and information back to Planning Applicants? There is no evidence that Applicants even bother looking at comments and other information.</p> <p>How will 'commenters' get any idea about whether the comments have been considered? How are questions from 'commenters' or members of the public answered? In most cases, it appears that questions are not answered at all. Applicants mostly ignore comments and do not answer questions.</p> <p>How do officers make sure that documentation in an application is accurate and complete? If the documentation is not correct or complete, who decides what needs to be done and how is it put right? How can officers know whether documentation, that is often very technical in content, is accurate and complete?</p> <p>I have numerous examples of incorrect and incomplete documentation that is never corrected, yet applications that are based upon such errors and omissions are still approved without condition.</p>

		<p>When an application is put in, particularly for commercial developments, the application is put together by consultants or land agents on behalf of the applicant. I accept that the consultants/agents deal with the Planning Dept on a daily basis with multiple applications. The initial Application form is treated as a mere formality in most cases and it is accurate to say that many of the forms contain basic errors. Examples are, again, numerous in my experience. To members of the public it gives the clear impression that the whole process is rigged, sloppy and not at all rigorous. If there are basic errors in the initial one-page document that are ignored, the impression given is that errors in the detailed documents to support an Application will also be ignored. Again, in my experience this is clearly the case.</p>
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General format of the SCI

Below are the comments received to the question:

Do you have any comments on the general format of our SCI? Is it clear and suitable for your needs? Draft SCI

1	ID: 136734703	No
2	ID: 136739516	Yes I think that it is a well constructed and drafted document.
3	ID: 136741848	<p>Pointless document/process when planning decisions are effectively taken by unelected bodies with token membership from councils who spinelessly fail to uphold the well being of the existing communities they are paid to serve and simply chase government funding for work only necessary to support personal agendas and ambitions (and then get well paid jobs with them when their local government time is up, despite clear conflict of interest...)</p> <p>No point in any public consultation when decisions are made outside the democratic process, please save the money and let Oxford University cash in on it's land banks as they feel fit, regardless of the public good...</p>
4	ID: 136742922	No as my previous answers have shown it is not easy to understand - nor is it presented or made that way - almost deliberate obfuscation
5	ID: 136751154	it is readable but, blimey, who's really going to wade through it all? And when will it next be updated?
6	ID: 136747636	too long. Explain why we have a local plan that doesn't address the need for social housing.
7	ID: 136784552	The whole document would benefit from being proof-read by an appropriately qualified professional. The plethora of grammatical errors somewhat detracts from the content of the document.
8	ID: 136806533	No comments.

9	ID: 136870611	The proof will be in the pudding, you can have all the consultations in the world and planning regulations to support that, but if your officers continually fail to carry out their role as enforcers of laid down legislation then its all pointless.
10	ID: 136876439	It is clear to me as a person working in the planning world.
11	ID: 136960581	SUBSTANTIAL SECTION ARE MISSING WHEN VIEWED ON MY P.C. PLEASE RESIUIE COMPLETE DOCUMENT
12	ID: 137033205	Dear Mr Duffield, The revised SCI is clear, logical and deals with all aspects of local authority planning, with links to the background detail. I consider it to a be useful guide which would enable all parts of the community to engage in the planning process. Kind regards, Roger Cox
13	ID: 137032921	Do you think many people read your documents, how do you test? Some might find the formal off-putting.
14	ID: 137060484	The general format in itself is clear in that the explanations at each stage are well set out. It shows just how complicated planning can be. However it does give the impression that comments and submissions from Groups or those of influence in their local communities are going to be listened to ...it presupposes that just by providing affordable housing along with the bulk of housing is going to be sufficient, with the odd school thrown in for good measure. It does not seem to mention a Medical Centre or increased public transport facility. It relies heavily on increasing car use especially into places of work such as Abingdon, Didcot , Oxford and Witney...and presumably puts more strain on car parking for railway stations to London etc. It means more vehicles trying to cross the already jammed bridges in Abingdon, the A338 becoming more nose-to-tail than ever, access to the A34 to get to Oxford Hospitals even more hazardous. So the format does not seem adequately to take into account the need to liaise with National road networks and county council road schemes in order to be able to justify having what is already an impossibly large number of vehicles and an unacceptable number of Flashpoints which , when causing accidents , shut down roads to a ridiculous extent. In the County Plan , the Vale of White Horse was acknowledged as having the most number of elderly and one person households in the county with no bus services and the most rural part of the county. It would be useful if all members of the councils tried accessing various important places from various sites in rural VoWH without a car or public transport at various times of the day/week and could compare experiences. Hello
15	ID: 137169359	It is ambitious. But what we want is for community objections to be upheld. Otherwise consultation is just a fig leaf
16	ID: 137186858	A summary of the decision-making body / personnel for each of the various types of Planning Policy Documents would be helpful. Apart from that, it is generally clear and suitable for our needs.

17	ID: 137428974	All very clear thank you.
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Other comments on the SCI

Below are the comments received to the question:
Do you have any other comments on our SCI?

1	ID: 136734703	No
2	ID: 136739516	<p>The reference to what representations are likely to be give weight leads to a separate page on material considerations. Although this (drafted in 2016) refers to national policy that also covers most of the other considerations, it does not make separate mention of climate change and biodiversity loss that should now (especially since the emergency declaration) be highlighted as the most important considerations to which substantial weight is likely to be given. This change would be for the benefit of both the consultees and prospective applicants/developers.</p> <p>There is a very brief mention of public speaking at committee. this should be expanded to say that nothing should be said at committee that has not already been said in writing. By allowing this the council has been undermining the fairness and lawfulness of the decision-making process by disadvantaging one of the parties.</p>
3	ID: 136741848	<p>Pointless document/process when planning decisions are effectively taken by unelected bodies with token membership from councils who spinelessly fail to uphold the well being of the existing communities they are paid to serve and simply chase government funding for work only necessary to support personal agendas and ambitions (and then get well paid jobs with them when their local government time is up, despite clear conflict of interest...)</p> <p>No point in any public consultation when decisions are made outside the democratic process, please save the money and let Oxford University cash in on it's land banks as they feel fit, regardless of the public good...</p>
4	ID: 136742922	No
5	ID: 136784552	Broadly, I think that this is a good document that adequately expresses the aims of the SCI.
6	ID: 136806533	No comments.
7	ID: 136876439	It is very wordy / lengthy and does not strike one as inventive.
8	ID: 136960581	NOBODY SEEMS TO HAVE CHECKED THIS DOCUEMNT BEFORE IT WAS ISSUED !
9	ID: 137032921	I havent read it, took a look , couldn't face it
10	ID: 137060484	I wonder how many people have been able to go through all the points and remember where everything was that was mentioned in itif everything is followed and ordinary members of the community feel that

		<p>they matter and are being listened to then this SCI may be fine ..but I do have strong reservations.</p> <p>Thank you for giving me the opportunity to share some observations!</p>
11	ID: 137169359	<p>It does not address the issue of conflict of interest. In the West Way planning dispute, the Vale was making a decision about its own property and had a financial interest. The document also does not address how planning permission can be subverted by the developer asking for alterations once the development is underway. In the case of West Way even now, 2 years after the building started, Mace wants to add two storeys to a building it has not yet put up; while the others seem to have more storeys than were permitted. You have to address the issue of complying with the result of consultations not ignoring them.</p>
12	ID: 137186858	<p>A few general principles should be included. For example:</p> <p>That a proportion of homes must be ""affordable"", with an indication of the intended proportion;</p> <p>That a proportion of homes must be accessible to disabled people, with an indication of the proportion (this should be higher than the national average).</p> <p>That highway improvements must improve accessibility;</p> <p>That community buildings provided must be accessible.</p>
13	ID: 137199868	<p>The following response was received by email:</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34 and M4.</p> <p>We have reviewed the consultation and have no comments.</p> <p>I hope the above information has been useful, please do not hesitate to contact me if you have any queries.</p> <p>Kind Regards, Glen</p>

14	ID: 137424073	<p>From letter, attached below:</p> <p>Thank you for consulting Historic England on the Vale of White Horse Draft Statement of Community Involvement (SCI) February 2020. As the government’s adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We support the general aims and approach to the draft Statement of Community Involvement. We welcome the acknowledgement of Historic England as a specific consultation body with respect to local plans at paragraph 10.5 and neighbourhood plans at 10.6, as well as reference to statutory consultees regarding planning applications at paragraph 22.2. We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement. For information and for further consultation please note our consultation email address e-seast@historicengland.org.uk . We hope that the above comments are of assistance. If you would like any clarification or would like to discuss the above please do not hesitate to contact me.</p> <p>Thank you again for consulting Historic England.</p>
15	ID: 137428974	All looks good - proof of utility will be in the execution.
16	ID: 137973435	<p>The below response was received via email from Turnberry on behalf of Oxford Brookes University, Harcourt Hill Campus, North Hinksey</p> <p>Vale of White Horse: Draft Statement of Community Involvement Objection on behalf of Oxford Brookes University, Harcourt Hill Campus, North Hinksey</p> <p>Oxford Brookes University operates its Harcourt Hill campus within North Hinksey and is intending to bring forward development plans to transform the campus. The site is significant within a local context in that it is a major land use within North Hinksey and provides much valued leisure facilities for the community. These facilities would not ordinarily be viable in that location were it not for University wishing to support its student and staff community. In a broader context, the campus is significant on the basis it is the largest most significant location for Higher Education within the District.</p> <p>The site is so significant that it is subject to Core Policy 9 in the existing Local Plan. The recent Independent Examiner’s Report in to the North Hinksey Neighbourhood Plan has demonstrated the problems that arise when a significant institution with large spatial interests is not engaged in the plan-making process and policy is ‘forced’ upon it. In that instance, the key policy in the proposed Neighbourhood which sought detailed control over the business and operational activities of the Harcourt Hill Campus was decisively rejected by the Examiner.</p>

	<p>Paragraph 16c of the NPPF states that, “Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.”</p> <p>We have underlined all the descriptions which could apply to Oxford Brookes University and the nature of its activities at Harcourt Hill. We therefore OBJECT to the current draft of the Statement of Community Involvement on the basis it does not pay sufficient attention to the University, which is a key part of its local community.</p> <p>In response, the SCI should be amended so as to specifically recognise Higher Education providers. We have set out the required changes below which would allow the University to change its position and support the SCI. Please note that text in red strikethrough shows where we propose a deletion and blue text shows a proposed insertion.</p> <p>Paragraph 9.5: Make the following changes to the penultimate bullet point: Target work with community groups, voluntary organisations, and businesses and education providers</p> <p>Paragraph 10.2: make the following changes:</p> <p>We continuously look to understand who we need to talk to in the local community to ensure that we consult in the most effective way. The local community includes, but is not limited to, the following: town and parish councils and meetings; local residents; local interest groups; local businesses; local community groups and organisations; faith groups; schools, and colleges and higher education providers; and ‘hard to reach’ groups.</p> <p>We trust these modest and proportionate changes can be made so the University can support the SCI.</p>
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17	ID: 138136155	<p>The below response was received via email from Radley Parish Council</p> <p>Views on the VWHDC draft Statement of Community Involvement</p> <p>Thank you for the opportunity to comment on this draft. While we are generally happy with the arrangements for engaging with the parish council and members of the community on planning matters, we do have some concerns on the procedures set out in the draft SCI as described below.</p> <p>We completed a Neighbourhood Development Plan in late 2018 and currently have two strategic housing sites within the parish which are in the process of development. Our comments reflect our experience of dealing with these matters.</p> <p>Summary of comments</p> <ul style="list-style-type: none"> i. Paras 11.13 – 11.23 of draft statement. Neighbourhood Development Plans. In exercising the ‘duty to support’, VWHDC should contribute constructively to the delivery of parish council’s planning objectives and not focus solely on process. ii. Paras 11.28 – 11.31. CIL. There is an urgent need for mechanisms to be established to allow for tri-partite discussion between district, county and parish about priorities for CIL expenditure. iii. Paras 20.1 – 20.3. Development Forums should be mandatory. iv. Para 22. Consultation on Planning applications. Parish councils should be consulted on ‘discharge of conditions’ applications. v. Paras 25.4 – 25.6. Planning Committee involvement in decisions on planning applications. We have concerns that the role of the planning committee is being eroded. We would like to see a published protocol clarifying the basis on which applications are referred to the committee for decision. We also have concerns about how pre-commencement conditions are handled. vi. Paras 26.1 – 26.4. Section 106/ planning obligations. Three-way meetings involving the district, county and parish should be incorporated as a recognised part of the pre-application process for strategic site development. <p>Policy Documents: Neighbourhood Development Plans (Paragraphs 11.13 – 11.23)</p> <p>These paragraphs describe the process for making a Neighbourhood Development Plan and VWHDC’s practice in delivering the ‘duty to support’ parish councils such as ourselves though the NP process.</p> <p>We consider that the Vale’s practice as described focusses too heavily on advising on the process of developing a generic plan (which is a relatively straightforward albeit long-drawn-out exercise) and not enough</p>
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on engaging with town/parish councils to help deliver their planning policy objectives (which involves understanding and engagement with the underlying planning issues as well as knowledge of planning law). This criticism reflects our experience in dealing with Vale officers in drawing up our own plan. Our more ambitious Neighbourhood Plan policies, such as those dealing with the Radley Lakes area and with housing mix, were developed in the face of ongoing negativity from the NP advice team, resulting in very considerable delays. There was no engagement from the Vale specialist countryside or housing teams which could have been valuable. Our policies were ultimately endorsed through the independent examination and our referendum, and have since influenced important development management and developer decisions. More might have been achieved in far less time had the Vale provided more open-minded and constructive support.

We would also have welcomed support in dealing with relatively technical matters such as professional-quality mapping.

Community Infrastructure Levy (CIL). (Paragraphs 11.28 – 11.31.)

These paragraphs briefly describe CIL and community involvement in developing the CIL charging schedule.

There is a complete gap in the arrangements when it comes to engaging with communities on how CIL should be spent, and this urgently needs to be put right. Parish councils have an interest in CIL expenditure plans both as representatives of the community where the development is taking place and as the ‘owner’ of a significant proportion of the CIL received. We have said from the start that there should be arrangements for the county, district and parish to discuss their plans for spending CIL in areas with largescale development but none have been put in place.

This has been a real problem in practice in reaching sensible decisions about the expansion of Radley Primary School, planned to be opened in September 2021. The extension is needed to accommodate children from the two strategic sites. Whilst committed to the extension, the county council appears to have no knowledge of its likely CIL income from the Radley sites. Nor have the county provided any clarity yet as to how the parish council might contribute financially, despite our repeated offers to help.

Liaison between the district council, county council and parishes over plans for CIL expenditure is an area which in our view needs urgent attention.

Development Forums (Paragraphs 20.1 – 20.3)

These forums provide an opportunity for parish councils and other community representatives to discuss concerns jointly with planning

officers and the developer at the pre-application stage. They are an excellent mechanism for ensuring that the local community perspective is properly heard and addressed at the formative stage of planning.

The forums were mandatory on developers when first introduced by the Vale, but were made an optional part of the procedure by the last administration. We urge that they are again made a mandatory requirement.

Consultation on planning applications (Paragraph 22)

Parish councils should be consulted on 'discharge of conditions' applications for major developments in their area. Our recent experience has shown that important amendments or refinements to the terms of planning consents are being agreed in response to such applications.

Planning Committee involvement in planning decisions (Paragraphs 25.4 – 25.6)

Whilst we recognise and accept that 90% of planning decisions are made by officers, it is vital for effective community involvement that elected members of the planning committee are in a position to take the ultimate decision, if necessary over-riding officer advice, in contentious cases. We have concerns that the role of the planning committee is being eroded.

We have recently been advised by the Vale's head of planning that pre-commencement conditions may only be imposed if the applicant has been consulted in advance. This constrains the ability of the Planning Committee to require such conditions to be imposed if they think fit, which in turn limits effective input from the community. It is important that the local community is provided with an opportunity to make an input into pre-commencement conditions for major applications before the application is submitted. We would also expect the Planning Committee to refer the case back to officers for further discussion with the developer where differences remain unresolved and the Committee consider that a new or modified pre-planning condition is necessary.

There should be a full statement of the circumstances in which individual applications are referred to the planning committee on the Vale's planning committee website (there does not appear to be one there at present). We understand that applications are automatically referred to the Committee if the local councillor supports a request from the parish council. This should be spelt out in a published protocol with an indication of the time limits within which requests for referrals need to be made.

Section 106/ planning obligations (paragraph 26.1 to 26.4)

This section notes that the Vale has no formal policy to consult on s 106 agreements but does liaise with parish councils to the extent that s 106

may support the improvement of community facilities. Parish councils' interests in how s 106 is spent goes well beyond community facilities.

In practice, as part of the pre-application discussions for the Radley strategic sites, Emily Hamerton set up a series of three-way meetings with her team, county council officers and ourselves. These produced a step change in the level of dialogue, enabling us to feed views both into section 106 decisions and other planning conditions. Some useful requirements for off-site road, cycle and public transport provision emerged from these discussions.

We recommend such meetings are incorporated as a recognised part of the process for strategic site development.

18	ID: 138196060	<p>The below response and attachments was received via email from Scottish and Southern Electricity Networks:</p> <p>Thank you for your message below regarding the above topic.</p> <p>As you are aware, 'we' already currently liaise on a regular basis in respect of Local Plan and Development Plan Documents (DPDs), Supplementary Planning Documents (SPDs) and Neighbourhood Plans, with Scottish & Southern Electricity Networks (SSEN) making relevant comments etc, as appropriate and when / where necessary.</p> <p>In respect of major housing / commercial developments, please see the attached two 'letters', which have previously been provided to 'you' on numerous occasions, which I have included again for the avoidance of any doubt.</p> <p>I trust that the above and attached is sufficient for your purposes at this time, but if you should have any queries, please contact me.</p> <p>For reporting purposes, Chief Planning Officers letter and Office of the Deputy Prime Minister letters below:</p> <p>Draft Letter to Planning Authorities</p> <p>Consultation re-proposed major housing/commercial developments</p> <p>Planning permission has recently been granted for a number of housing or industrial / commercial developments on land crossed by overhead lines which are owned and operated by Southern Electric Power Distribution (SEPD). SEPD is concerned that insufficient discussion has taken place between SEPD and Planning Authorities concerning the future of these lines prior to the granting of planning permission.</p> <p>These overhead lines generally afford supplies to other locations beyond the development, even whole towns or parts of cities in some instances and are carried on either steel towers or wood poles. These structures and the overhead conductors they support have been placed in accordance with planning permission in the form of a Section 37 (Electricity Act 1989) consent granted by the Secretary of State. This consent can only be granted following initial consultation with the Local Planning Authority.</p> <p>For Planning Authorities to not properly consult and to impose conditions such as "the overhead lines are to be removed", which developers would be unable to comply with themselves would effectively be ultra vires. We believe this issue has been previously highlighted in the letter from the</p>
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Office of the Deputy Prime Minister to the Chief Planning Officers in England dated 25 November 2002. (copy enclosed)

As such, SEPD believes that in these circumstances, the Planning Authority should impose a condition prohibiting development until such time as the developer has reached agreement with the Distribution Network Operator (DNO) (a) as to how the development can be laid out such that the line(s) can be retained in their current position or (b) such that contractual arrangements have been agreed to modify the overhead lines.

It is for Planning Authorities to consider how best to achieve this when land is first being considered for development. For example it may be that Planning Authorities consider imposing conditions on developers requiring them to conclude arrangements for modifying the existing overhead lines before submission of their Planning Application or prior to any planning permission being granted.

I would be pleased to receive any comments you may have and discuss further, (if necessary by meeting with you) how to improve consultation on this important issue.

Office of the Deputy Prime Minister letters below:

Dear Colleague

CIRCULAR 11/95: USE OF NEGATIVE CONDITIONS

I am writing to draw your attention to the advice in paragraph 40 and the footnote on page 16 of the Annex of Circular 11 /95 on The Use of Conditions in Planning Permissions. The advice is on conditions worded in a negative form, prohibiting development until a specified action has been taken.

Following the High Court case Merritt v SSETR and Mendip District Council we need to amend the advice in Circular 11/95. Until we are able to amend the Circular, please would you note the following advice when imposing negative planning conditions.

The advice in Circular 11/95 on conditions depending on other's actions (Annex paragraphs 38 and 39), says that it is unreasonable to impose a condition worded in a positive form which developers would be unable to comply with themselves, or which they could comply with only with the consent or authorisation of a third party. Similarly, conditions which require the applicant to obtain an authorisation from another body should not be imposed.

		<p>Although it would be ultra vires to require works which the developer has no powers to carry out, or which would need the consent or authorisation of a third party, it may be possible to achieve a similar result by a condition worded in a negative form, prohibiting development until a specified action has been taken.</p> <p>The way the advice is currently worded in paragraph 40 is that such a condition should only be imposed on a planning permission if there are at least reasonable prospects of the action in question being performed within the time-limit imposed by the permission.</p> <p>As a result of the Judgement in Merritt, paragraph 40 should be amended to read, "It is the policy of the Secretary of State that such a condition may be imposed on a planning permission. However, when there are no prospects at all of the action in question being performed within the time-limit imposed by the permission, negative conditions should not be imposed. In other words, when the interested third party has said that they have no intention of carrying out the action or allowing it to be carried out, conditions prohibiting development until this specified action has been taken by the third party should not be imposed."</p> <p>The foot note at the bottom of page 16 should be replaced with: "A policy of refusing permission where there was no reasonable prospect of planning conditions being met could be lawful, but sound planning reasons for the refusal should be given and it should be made clear that this was only a starting point for consideration of cases."</p> <p>Yours sincerely, JOHN STAMBOLLOUIAN</p>
19	ID: 138342831	<p>The below response was received via email from Marcham Parish Council:</p> <p>Marcham Parish Council would submit the following comments in regards to the draft Statement of Community Involvement:</p> <p>1. s. 26 should provide that draft s. 106 Agreements be sent to the relevant Parish Council for information purposes and invite comment. The Agreements currently are finalised between the District Council and the developer/landowner. There can be facts known locally of which the Parish Council is aware, which could be relevant. Whilst the situation is changing with CIL, the Parish Council, at least should have the opportunity to have sight of anything which affects its parish including the</p>

		<p>draft s. 106 Agreements.</p> <p>2. The Council, too would request that Parish and Town Councils are notified when applications to discharge conditions are submitted. This would give an opportunity for the Parish Council to view the application, to check that what is proposed falls in line with its initial comments on an application.</p>
20	ID: 138562827	<p>The below response was received via email from Office for Nuclear Regulation:</p> <p>In response to your email dated 27 February regarding the Vale of White Horse District Council draft Statement of Community Involvement (SCI), ONR has the following comments:</p> <p>The SCI states ‘We will endeavour to engage with a wide range of formal and informal local community groups and voluntary organisations, stakeholders, town and parish councils and parish meetings and other groups in the community that we become aware of’.</p> <p>Due to location of the Harwell nuclear licensed site, ONR requests to be consulted in line with our Land Use Planning processes which are published at http://www.onr.org.uk/land-use-planning.htm for proposed developments within our consultation zones that meet our consultation criteria.</p> <p>Please note that we are currently updating our Land Use Planning processes and our website will be updated accordingly.</p>
21	ID: 138784656	<p>The below response was received via email from Wycombe District Council:</p> <p>Many thanks for seeking the views of Wycombe District Council (WDC) on the draft SCI for the Vale of the White Horse.</p> <p>Today is the first day of Buckinghamshire Council (which supersedes and replaces the previous 5 councils of Buckinghamshire) and as you can imagine, under the current crisis, an overall council-wide approach to consultation response has not yet been agreed.</p> <p>What I can say is that, yesterday, WDC had no comments to make on the draft SCI. If I’m privy to any new arrangements, I’ll try to ensure that a council-wide response reaches you.</p>

22	ID: 138785537	<p>The below response was received via email from Oxford City Council:</p> <p>Oxford City Council Response to the Consultation on the Draft Revised Vale of White Horse Statement of Community Involvement February 2020</p> <p>Thank you for inviting Oxford City Council to comment on the Draft Revised Vale of White Horse Statement of Community Involvement.</p> <p>We have reviewed the above document and support the Draft Revised Statement of Community Involvement.</p> <p>The Council also support the revised draft accumulating the 2016 Statement of Community Involvement's separate parts/documents together into one comprehensive document.</p> <p>Oxford City Council has no other comments to make in response to this consultation.</p> <p>If you require any further information, please do not hesitate to contact us.</p>
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23	ID: 138785954	<p>The below response was received via email from Wantage and Grove Campaign Group:</p> <p>Vale of White Horse Statement of Community Involvement</p> <p>This is our submission to the consultation on the Draft Revised Statement of Community Involvement.</p> <p>Introduction</p> <p>1) This submission covers the following points:</p> <p>a) Information about the Wantage and Grove Campaign Group</p> <p>b) Our feedback on the Statement of Community Involvement.</p> <p>Information about the Wantage and Grove Campaign Group</p> <p>2) We are the Wantage and Grove Campaign Group, a non-party-political group of over 1000 individuals who live in and around Wantage and Grove (mainly in the OX12 postcode area) in Oxfordshire. We are not against any development in Wantage and Grove but:</p> <p>a) Developments should be proportionate and sustainable; and</p> <p>b) The infrastructure should enhance and improve quality of life for its residents.</p> <p>Our feedback on the Statement of Community Involvement.</p> <p>3) Thank you for combining the previous documents into one – this makes it much clearer.</p> <p>4) What does “early involvement with local communities in the preparation of our planning policy documents and in the consideration of planning applications,” (Page 5) mean?</p> <p>5) How will you “endeavour to engage with a wide range of formal and informal local community groups and voluntary organisations, stakeholders, town and parish councils and parish meetings and other groups in the community that we become aware of” (page 5)?</p> <p>6) The document states that you are “make our planning documents, background studies and responses to consultations are readily available to the public on our website and in some cases on paper at local libraries and at our offices” (page 5 box 5). Why not in parish council offices?</p>
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	<p>7) Can you provide a list of “deposit locations” (para 3.3) please?</p> <p>8) This link does not exist “Further information on our SPDs can be found online at: http://www.whitehorsedc.gov.uk/spd .” (para 11.8).</p> <p>9) The figures in Section 11 are very clear – thank you.</p> <p>10) Many of the strategic decisions which drive the planning policy in the Vale are taken at either OXLEP or the Growth Board, of both of which the District Council are a member – how does the Vale ensure that the local Community are involved in this process and why isn’t this included in this document? We understand that the “Assessment of Growth Needs commission” is underway and that there will be no separate consultation on this. Given all the issues for the Vale created by the SHMA since 2014 and the lack of consultation around that, this lack of consultation on the Assessment of Growth Needs seems to be a significant issue.</p> <p>11) During the planning application process, (figure 9 step 5) the requirement appears to be, that when an application is formally amended to address any planning issues raised, to re-consult anyone who responded to the original consultation. It may be that the amendment changes the application in such a way that an individual who didn’t respond to the original consultation may want to. Surely any amendment should be referred to all those who share a boundary with the site, the town or parish council, any relevant specialist consultees and anybody else who might be affected not just those who have already responded.</p> <p>12) Any minor application can only be discussed at the Planning Committee if the chairman agrees to the local district councillor’s request to call in an application. No mention is made of the obligation of the individual district councillor to call in an application if an individual or the town or parish Council requests it. What grounds does the councillor have for refusing to call in an application? Also what grounds does the chairman of the Planning Committee have for refusing the request?</p> <p>13) Para 19.2 states that any pre-application advice letters between the applicant and the council will be disclosed when the application is formally submitted. No mention is made of notes of any discussions held either by phone or face to face meetings. Surely these should also be disclosed?</p> <p>14) Section 20 relates to development forums. We have found the</p>
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development forums for Crab Hill and Grove Airfield a useful way of providing communication channels between the community and the developer. We would suggest that these should be made a formal part of the process for any large development where applications involve more than 200 dwellings or are part of a large scheme of more than 200 dwellings.

15) Section 22 relates to who is consulted on any application. We have noticed that even though some of the reserved matter applications for major developments will be visible from the AONB, they are not always listed as a consultee. Why is this?
Could they be added to the requirements in some way?

24	ID: 138788800	<p>The below response was received via email from Fyfield and Tubney Parish Council:</p> <p>Our comments relate to SCI Section 14 ‘Comments made on Planning Policy Documents’. We believe that our views are shared by many other parish councils, action groups and individuals.</p> <p>F&T PC together with FLAG opposed the Vale’s inclusion of 600 new dwellings on site KBAG_A, Fyfield Land to the East of Kingston Bagpuize with Southmoor, within its strategic allocations in the Local Plan 2031 Part 2 (LPP2). Our experience throughout was of a planning system that gave no weight to the concerns of the local community and of a consultation process that was a hollow charade.</p> <p>On the basis of that experience the Draft SCI does not address our concerns. We believe that the consultation process with respect to the preparation of Development Plans is flawed. It is flawed because, in our experience, although a consultation is duly made it is done so as a formality without substance. Responses to representations are formal, superficial and unsubstantiated; and representations are then ignored. A consultation is meaningful only if the representations are taken seriously. A consultation is meaningful only if it can influence the final plan. Otherwise there is no point in the consultation. The process must be two-way. The planning procedure must be flexible. Representations made on behalf of local communities, who best understand the situation on the ground, are essential and must be respected.</p> <p>We cite, as a prime example, our experience of consultation on traffic matters in connection with the preparation and eventual adoption of LPP2.</p> <p>At both the Regulation 18 and 19 stages of LPP2 we raised serious concerns (amongst many others) about the effect of the KBAG_A development on the traffic in the Kingston Bagpuize – Frilford – Marcham area. These were ignored until the public examination of LPP2. In fact, the responses to our representations were met with bland statements to the effect that everything had been thought about, that everything was under control, and that we should not worry. We demonstrated this was not the case. Moreover, we demonstrated that no consideration whatsoever had been given in the plan to the effect of the additional traffic on the air quality in Marcham.</p> <p>The onus should not have been on us to do that. Rather, it was for the planners to take note of our representations and, in the light of these, ascertain the facts (rather than quote what amounted to opinion and ignore the available public evidence) and to modify the plan accordingly. That did not happen until the public examination, which was much too</p>
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late in the day. Moreover it happened only after the intervention of the County Council, which unlike the District Council, paid attention to the evidence we had submitted. Eventually LPP2 was modified but prompter action would have resulted in a better plan to the benefit of all the local communities. We concluded that the object of the consultation exercise was simply to tick a box and progress the plan at all costs; there was no flexibility; there was no constructive dialogue.

In this particular example we were able to deploy local technical expertise although, as we say above, we should not have had to do so. Other communities may well not have such expertise available. It is imperative, therefore, that the representations to any consultation by any community are taken seriously and followed up and, where appropriate, acted upon by the planners. An effective dialogue between the planners and the community should be established; plans should be modified if necessary.

The pattern of dismissive inattention to local concerns was repeated over the whole range of our representations in response to LPP2. They included:

1. An overarching document (13 pages), developed with considerable effort and carefully framed within our understanding of planning policy considerations, arguing that the inclusion of KBAG_A was: (a) unsound because it was not consistent with the NPPF; not justified because the evidence base was seriously flawed (or ignored); not positively prepared because of the harm it would do to Fyfield and Tubney; not effective because of questionable viability; and (b) not legally compliant in its failing to engage with the parish council.
2. This representation was supported by a copy of a petition signed by 310 residents and businesses (98% of the local population). The original of the petition was delivered to the Bursar of St John's College, Oxford (the landowner) and the District Council.
3. A detailed summary (nine pages) of the impact of additional traffic arising from the proposed development on the already congested A420 and A415 roads (see above). This summary cited evidence from a report prepared by Atkins for OCC which was published by VoWH DC as part of the evidence base for LPP2.
4. A paper demonstrating a complete failure by the District Council to meet statutory requirements for engagement with F&T PC (eight pages). Which accompanies this submission.
5. Miscellaneous documents relating to (a) the site not making a useful contribution to Oxford's unmet housing need; (b) the harm the site would

	<p>cause to the Corallian Ridge; and (c) the lack of safeguards to prevent a concrete wasteland of a half-built housing estate in the event of adverse economic circumstances.</p> <p>This was the key stage in the final preparation of LPP2 before it was submitted to the Inspector for public examination. The Vale's 'Regulation 22 Consultation Statement Appendix 3: Summary of Representations' document is the sole source of its response to the points raised by objectors. The site KBAG_A is dealt with on page 209 onwards. A sample of the Vale's comments is as follows:</p> <p>"The Council is content that the proposed development at Kingston Bagpuize with Southmoor will not lead to any significant highway impact and that the site has access to relatively good public transport"</p> <p>Much later, during the public examination itself, the Vale had to concede – under pressure from Oxfordshire County Council – that the site could not be occupied before improvements to the A415/ A338 Frilford junction because of traffic congestion. They also accepted the need to solve the air quality problem in Marcham. Oxfordshire County Council also insisted that a new traffic survey was necessary to establish an up-to-date baseline count before it would consider supporting the site's development.</p> <p>"The Council has acknowledged the petition submitted by Fyfield and Tubney Parish Council to the publication of the Part 2 Plan A Planning Inspector will have the opportunity to examine and consider all representations, including the petition"</p> <p>Surely it was the responsibility of the Vale to consider the feelings expressed by local residents, prior to the Inspector's examination.</p> <p>"It is considered that the majority of additional traffic will travel towards Oxford, Abingdon or Science Vale and so travel to the east, rather than through Marcham."</p> <p>Not true. Even the site promoter's own traffic evaluations state otherwise. It demonstrates how little thought was given to our representation because Marcham is to the east of the site and on the direct route to Abingdon and Science Vale.</p> <p>"The Council remains content that the site is deliverable and viable and can provide appropriate contributions to necessary infrastructure"</p> <p>This statement was highly questionable. At a later stage, when detailed submissions were made to the Inspector, the site promoter increased the number of dwellings to 700 and added on a 70-bed care home. There is no other explanation than to assume that the site would not be viable as</p>
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it stood given the infrastructure required. There is of course no guarantee that the size of the development will stop there if costs of infrastructure continue to increase.

The above are just a few examples of the arguments put forward by the objectors and the Vale's inadequate responses to the many valid points raised. F&T PC and FLAG subsequently submitted to the Inspector a summary of 50 issues (17 pages) where the site failed to comply with the NPPF or contravened the strategic objectives and development policies described by the Vale. It also submitted two further documents detailing (1) the inappropriateness of the site and the unsound, selective and biased evidence base, and (2) the impact of traffic associated with the construction of 600 homes at the site, and further correspondence relating to the effect of the traffic on the air quality in Marcham. Our assessments of the latter were subsequently confirmed by the site promoter's own traffic and AQ assessments. This evidence should have been available before the publication of LPP2, and informed the final plan.

It is our view that our substantial representations on the LPP2 were completely ignored and not accorded due consideration, and that the responses fail the tests of due process and reasonableness. We challenge the District Council, as part of the evolution of its consultation statement, to test that view by inviting an independent planning consultant to conduct a paper review of our submissions and of the responses to them. We are confident that such a review would condemn the District Council's responses as totally inadequate, and confirm our view that its consultation processes were mechanical, insensitive and deaf to local concerns.

All of the arguments put forward by F&T PC/FLAG remain valid. It is clear to us that the Inspector was constrained by the narrow criteria upon which he could determine LPP2 to be legally compliant and sound and that it fulfilled a duty to co-operate. The objections we raised ought to have been given more consideration at an earlier stage. We believe that the Vale's response was inadequate given the weight of our representations and should have been studied in more detail and acted upon. The result is a local plan which is at odds with the views of the local community.

This result, in our view, reflects the political imperatives of a Council leadership in tune at that time with the policies of the government of the day and anxious to be seen to play a full part in achieving them, and the day to day activities of a planning department operating within political guidance that the targets had to be met regardless of the damage done to local communities. It also reflects the total absence in the planning system of any common sense: it is so obviously inappropriate to build a

	<p>suburb of 600-plus houses in an area with no local employment, requiring its working inhabitants to drive to work on already congested roads, that we still find it incredible that the site has been included in the LLP2 allocations.</p> <p>The process of Community Involvement is outlined in the flow chart on page 12 of the Draft Revised Statement of Community Involvement. This should be modified as follows:</p> <p>May we suggest the text in the third box from the top in the diagram on page 12 which reads 'Process representations received' could be modified to read:</p> <p>'Note, respond carefully to and, where appropriate, act upon representations received, and modify the plan accordingly'</p> <p>Also, the text in the sixth box on page 12 which reads 'Respond to representations received on the published DPD' could be modified to read:</p> <p>'Note, respond carefully to and, where appropriate, act upon representations received on the published DPD, and modify the plan accordingly'</p> <p>The process of consultation with the community must be improved and the text of the SCI changed to reflect this.</p> <p>There follows the paper submitted to the LPP2 examination which is referred to above.</p>
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25	ID: 138792091	<p>The below response was received via email from Cherwell District Council:</p> <p>Draft revised Statement of Community Involvement (SCI) for Vale of White Horse District Council</p> <p>Thank you for inviting Cherwell District Council (CDC) to respond to your consultation on the above document.</p> <p>CDC welcome Vale of White Horse District Council's updated Statement of Community Involvement (SCI). We are supportive of Section 2 and of the commitments made under the Duty to Co-operate to take into account adjoining councils' policies and proposals for addressing strategic planning matters and of developing statements of common ground with neighbouring councils when developing a Local Plan.</p> <p>We are fully supportive of the commitment in paragraph 10.5 to always consult on planning policy documents with the appropriate consultation bodies in accordance with the relevant and up to date regulations. As a suggestion, we think it would be useful if the specific and general consultation bodies currently prescribed by the regulations were presented in terms of the different sorts of planning policy documents to be consulted on, perhaps as an Appendix to the SCI.</p> <p>Section 3 of the SCI refers specifically to consultation on planning applications. We are supportive of the commitment to notify Town and Parish Councils of applications adjacent to their boundary but would request clarification that such notification extends to Town and Parish Councils outside of Vale of White Horse administrative area. We would also like to request clarification on whether adjoining Local Planning Authorities would be notified of applications for any strategic scale sites. CDC would wish to be notified of any planning applications for strategic sites in close proximity to their border.</p> <p>Please keep us informed at all the key stages in the process of producing the document.</p>
26	ID: 137969613	<p>The Consultation and Community Engagement team have reviewed the draft SCI and have some comments and suggestions to make, which are being sent under separate cover.</p>

27	ID: 138983266	<p>The below response was received via email from Avison Young on behalf of Nuclear Decommissioning Authority (NDA):</p> <p>VALE OF THE WHITE HORSE DISTRICT COUNCIL: DRAFT STATEMENT OF COMMUNITY INVOLVEMENT CONSULTATION</p> <p>Representation on behalf of the NDA and Magnox Limited</p> <p>We write to you to state that we agree with the principles contained within the draft SCI. However, we would wish to list the Nuclear Decommissioning Authority ('the NDA') as a Local Stakeholder representing the interests of a business within the Vale of the White Horse district as part of any upcoming Local Plan consultation opportunities.</p> <p>By way of context, the NDA is the strategic authority responsible for managing the effective and efficient clean-up of the UK's nuclear legacy, which includes the Harwell site. Land within this Nuclear Licenced Site (NLS) is subject to the decommissioning of redundant facilities and, where necessary, the remediation of land. Magnox manage the site's decommissioning on behalf of the NDA in order to carry out the processing of materials and wastes from nuclear fuel fabrication and decommissioning activities at the site.</p> <p>In requesting this we hope to affirm the NDA's position as an important stakeholder in the production of any new Local Plan material.</p> <p>If you require any clarity in respect of this representation, then please contact me on 0191 269 0097 or at hannah.gray@avisonyoung.com.</p>
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28	ID: 138983541	<p>The below response was received via email from CPRE:</p> <p>Introduction No acknowledgement of the climate emergency.</p> <p>change Decisions we make, and policies we set, affect local residents, businesses and organisations, so it's important they are involved from the start.</p> <p>To Decisions we make, and policies we set, affect local residents, businesses and Organisations now and in the future, so it's important that everyone is involved from the start.</p> <p>All emphasis is on how information is published and how feedback is collected. There is no process by which the feedback is considered and incorporated into the plans.</p> <p>Section 1 Shaping our Future</p> <p>2.2 Because of the long lasting impact of developments, the principles of engagement must be defined in the context of sustainability and the climate emergency declared by the Vale.</p> <p>3.3 Please clarify under what circumstances paper copies will be provided to Parish Councils. In the past much money has been wasted sending out copies to PC clerks which are rarely accessed by the public - especially when they are sent to a clerk at their home address which is not inside the parish. Nowadays, electronic copies should suffice, with an obligation on PC's to provide access on request to parishioners without internet access.</p> <p>3.5 Status and role of this database needs better definition. If you ask to be added to the database it is not clear what will then happen, and on what you will be consulted. I receive details of nearby planning application. The email has no link for unsubscribe, nor a link to update preferences, e.g. to receive details about the initial consultations on Local Plan 2041.</p> <p>6.2 "We will review this SCI periodically". How, will there be targets for any review?</p> <p>Section 2 Planning Policy</p>
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	<p>7.1 A misleading diagram. No mention of DPD's, SPD's etc, and not clear where the mentioned OCC mineral plan fits in. No mention of 2041 Plan.</p> <p>11. heading is Local Plan and Development Plan Documents (DPDs), with Figure 1: Key stages in the preparation of Development Plan Documents, and Figure 2: Key stages in the preparation of Supplementary Planning Documents (SPDs)</p> <p>There is no chart for the Local Plan itself. The implication is that the Local Plan is complete. However, consultation has started on LP 2041 with a call for sites.</p> <p>Consultation process for a Local Plan must be defined.</p> <p>In Figure 1: Key stages in the preparation of Development Plan Documents, box 3 'Process representations received'. And Box 6 'Respond to representations received on the published DPD'.</p> <p>Expand both with more detail about how the representations will be reviewed, considered and acted upon.</p> <p>11.8 Further information on our SPDs can be found online The link does not work.</p> <p>11.9 Sustainability Appraisal Needs reference to the Climate Emergency declared by the Vale.</p> <p>Last sentence which refers to EC/2001/42 may need a commitment to follow equivalent UK legislation post Brexit.</p> <p>11.31 Figure 5 CIL preparation Add a step for Appraise any significant changes to the schedule following consultation</p> <p>13.6 Consultation over holiday periods. Change may to will</p> <p>14.1 This is the weakest part of the process. Comments are often summarized or abbreviated (justifiably?) More often than not they are dismissed. Very few comments are accepted leading to changes to the documents, and the overall feeling is that due process might have been followed, but the comments are ignored - the plan is right.</p> <p>14.4 Mention is needed of the online process used to collected comments,</p>
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whereby comments is required section by section, so responses are fragmented and it is very hard to make an argument that applies to the overall plan, rather than individual sections.

Section 3 Development Management

20 Development Forum

Experience with Valley Park was that the Development Forum was a total waste of time. Developer was defensive and not really prepared to listen. And to be fair other participants were probably also not listening, and just wanted to say what a bad idea the project was. Not a construction process.

25 Decisions

Needs something on how decisions are communicated. For big applications requiring a S106 the committee may be minded to grant permission, but the decision is not implemented until the S106 has been agreed. Meanwhile there is no record of status on the planning database, and you have to wait weeks before the minutes of the planning committee meeting are published. Case in point is Valley Park. P14/V2873/O. Database shows No decision issued. But it went to Planning Committee FOUR years ago. What is going on.

22 Who we consult with

Figure 10 defines minimum neighbourhood notification. Previous SCI went on to state: "In most cases, where new development (e.g. 'major' application) affects more properties than those that are immediately adjacent to the boundary of the site, wider consultation may be carried out.

We encourage residents and businesses to subscribe to our email alerts, which (by post code) will automatically notify you of applications made in your street"

Please re-instate a) the commitment for wider notification for major applications and b) the option of email alerts. SCI must include details of how one can register for planning notifications.

25.5 Speaking time

I thought this was changed 5 minutes for major applications (in line with SODC?). There should be an opportunity for committee members to question the speakers. If it wasn't changed – it should be.

26.3 We do not consult on Section 106 agreements.

This is bad. The S106 is the one area where the community can see some benefit from a development and where there is almost no scope for engagement and consultation.

		<p>A sympathetic officer may list parish requests for S106 when reporting to the planning committee. After committee the S106 goes into a black hole (Valley Park S106 has been there for 4 years). When it emerges, and the S106 published and the decisions issued, it is too late to correct any mistakes. e.g. one S106 mentioned defined the wrong parish (Harwell, not E Hendred) for receipt of tennis court money.</p> <p>A draft of the near final S106 should be provided to those affected by it for review/checking prior to final agreement.</p> <p>28 Planning Enforcement The statements here need to be backed up with actions (albeit as a last resort).</p> <p>28.5 Provides a mechanism for reporting a suspected breach. Needs an additional para defining how the “reporter” and the public will be kept informed of the status of the breach and the remedial actions sought.</p> <p>Appendix A Publicity “Applications affecting the character and appearance of a conservation area” Shouldn't these also be notified to land owners/occupiers? end</p>
29	ID: 139223227	<p>The below response was received via email from Roger Cox:</p> <p>The revised SCI is clear, logical and deals with all aspects of local authority planning, with links to the background detail. I consider it to be a useful guide which would enable all parts of the community to engage in the planning process.</p>
30	ID: 139223568	<p>The below response was received via email from Need not Greed Oxfordshire:</p> <p>Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together representing thousands of community members. Our campaign is committed to:</p> <ul style="list-style-type: none"> • A restoration of planning principles, with a proper balancing of economic, environmental and social considerations; • Local democracy, with planning control in the hands of locally elected and accountable representatives; and • Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.

	<p>We welcome this Statement of Community Involvement and the opportunity to comment.</p> <p>Our key concerns are that:</p> <p>a) It should be made clear that community involvement should extend to the earliest part of the relevant process. In particular, key documents such as the Housing Needs Assessment currently being prepared for the Oxfordshire 2050 Plan, should be subject to transparent public debate. It is not acceptable for them to be presented as <i>fait accompli</i> 'evidence documents' without an opportunity to question the assumptions on which they are based. We must at all costs avoid a repeat of the 2014 Oxfordshire Strategic Housing Market Assessment that was drawn up behind closed doors but contained aggressive and unrealistic growth targets that subsequently dictated the content of District Plans.</p> <p>b) When levels of growth are under consideration, there should be a commitment to providing an option based purely on the natural growth needs of the existing population.</p> <p>c) The SCI focuses on the mechanisms of consultation but there should be greater clarity on how the outcomes are addressed ie how the local authority should engage and respond, including modifying the plan accordingly.</p> <p>Detailed Comments</p> <p>Para 1.2 needs to set out a clearer objective of consultation</p> <p>This could be:</p> <p>'To give local people and organisations various good opportunities to get involved and influence and guide local plans and planning applications.'</p> <p>This section on the principles of engagement should also make reference to sustainability and the climate emergency declared by the Vale, because of the long lasting impact of development.</p> <p>You should add a new paragraph 9.6, as follows:</p> <p>9.6 Consultations on the Local Plan will offer a range of options and choices to consultees. These should all reflect any nationwide development policy, for example the current proposals to 'level up' England's regions, notably the North of England.</p> <p>As examples, options will include:</p>
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• Options that vary the overall level of growth for the district. A central option should always be to meet likely local needs based on past trends and tackle affordability problems. Other options might consider lower or higher growth than that. Lower growth might be necessary if constraints restrict development. Higher growth might be considered if there is clear evidence for that. If higher growth is considered it will be appropriate to consider mitigating the risk that it does not occur by phasing the release of land for development.

• Options that vary the location of new development (or explain why this is not possible).

Figure 1 – Three changes as follows:

1. Add at the foot of Figure 1 a note saying:

Note on the Pre-production stage

The first stage is 'Pre-production' during which evidence is gathered. This means assembling relevant information or data about the area, its residents, businesses, land-use, environment and so forth. There is no Community involvement at this stage.

However, if forecasts of growth are made during the first stage, many assumptions have to be made (these are not 'evidence'). In this case, the uncertainty will be recognised and explained. There will then be at least two different growth options for the Community to be consulted on in the next stage. One option will be based on past trends and the needs of the existing population. Other options may imply higher – or lower - growth than that.

This will ensure that the Community consultees can properly consider the key question of the Vale's overall growth prospects. Community involvement will not exclude considering the level of growth locally at an early stage, as happened in the previous plans.

2. Figure 1 - Amend the third box from the top
This stage is - 'Process representations received'

Amend this to:

Respond clearly and publicly to representations received and where appropriate modify the plan accordingly

3. Figure 1 – Amend the sixth box from the top
This stage is - 'Respond to representations received on the published DPD'

These will be representations just before submission of the plan to the Secretary of State, under Section 20 of the Town and Country Planning (Local Planning) (England) Regulations.

Amend this to:

Respond clearly and publicly to representations received and where appropriate modify the plan accordingly

Para 6.2 Review

This section should make it clear how the effectiveness of the SCI will be reviewed.

What targets, if any, will there be for public engagement?

European/EU legislation

Mentions of Europe (or EU) in paragraph 11.9, the footnote on page 16 and the section on Strategic Environmental Assessment on page 35 need to be reconsidered. If it is not clear what the alternatives are, this should be noted. We would be unhappy if there was any weakening of the Environmental standards, which have often been ignored by those obsessed with rapid growth. There is an argument for specifically mentioning the climate crisis and the key zero carbon reduction targets as well.

The next sections will explain our concerns and reasons for strongly suggesting that the level of growth should be subject to early consultation and 'Community Involvement'

NNGO Reasons for concern about levels of growth

We have many reasons for concern about the levels of growth that the Vale (and other districts in Oxfordshire) have had to plan for.

Based on past experience, what the draft implies is that you will predict vast amounts of growth in the Vale and then the public will find that they can't reduce these figures or even amend the plan to reduce risks. With high growth figures the Vale will be hard put to meet the various housing land supply targets and this risks the plan being replaced by a free for all for developers.

Even if you elect a whole new set of councillors that agree there should be less growth, the government minister may intervene and give them no choice but to accept the high figures...

Detailed points are set out below:

- There is no clear national spatial policy, instead there seems to be a development everywhere approach (even in areas dominated by flood plains, AONB etc). Locally this meant that although large numbers of people were expected to move to Oxfordshire to find work, there was no consideration of the effect that this emigration would have on the places that they came from. Now the government is apparently committed to 'levelling up' England's regions. This currently seems to focus on redirecting investment in infrastructure from London (in particular) and the SE region to the North of England. This government policy may widen to address other concerns – inequality and child poverty for example. This approach seems likely to reduce the prospects for very rapid growth in Oxfordshire, as there will be less money to fund the infrastructure that would be required to develop to such an extent.
- The previous plans were entirely based on one set of figures, from Oxfordshire's SHMA1 (Strategic Housing Market Assessment). This was produced by external consultants GL Hearn, who describe themselves as 'a market-leading UK real estate consultancy' 2 in 2014. They produced forecasts for Oxfordshire districts in 2031 that assumed very rapid growth in high tech jobs that would attract people to Oxfordshire and they would need housing. About half of the growth planned for Oxfordshire was to deal with this additional need. GL Hearn is clearly not an independent source of forecasts.
- Once these figures had been 'accepted' they were seen to be set in tablets of stone and beyond challenge by local people. Valid criticisms were made of the figures at the Examination in Public of the current Plan but these were all dismissed. Meaningful consultation had been short-circuited by pushing high growth in at the 'Pre Production, evidence gathering' stage. Furthermore, the very rapid growth forecast for Oxford resulted in an overspill of housing need to the Vale (and other districts), which necessitated a second plan – 'Part 2' – where more sites had to be found for development.
- The clear risks of this jobs-led strategy were not recognised or mitigated. There was no contingency planning for the risk that job growth might not materialise. There was no means in the local plan to mitigate the risk - for example, by releasing land for development in a phased way. A very optimistic approach to development of the Oxfordshire economy was assumed. But this has clearly not worked. Many of the new jobs are (based on national and SE regional trends) zero hours contracts so typically low paid and temporary, not high skilled (eg Deliveroo). Many were taken up by existing residents of the County, not

in-migrants (activity rates rose). Many are self-employed (eg delivery van drivers). Also, the economy is inevitably unpredictable. Who (for example) could have forecast earlier this year that by the beginning of April, most of the Oxfordshire economy would have been shut down by a microscopic virus? Who dare now forecast where the Oxfordshire economy will be by the end of 2020? Who can forecast what the effect of us leaving the EU (with or without a deal) will be in subsequent years?

- Into this process, came the proposals to build 1 million more houses in the Oxford/Cambridge 'Arc'. With maybe 300,000 more dwellings in Oxfordshire. Linked to this was the proposal for an Oxford to Cambridge 'Expressway', about which there is continuing uncertainty.

- Also, there is the example of the recent treatment of South Oxfordshire's plan. New councillors who were committed to reducing housing growth in that area were elected by local people. This has led to a long stand-off between SODC and the government minister, Robert Jenrick. He now requires SODC to hold an examination of their Local Plan and secure its adoption by December 2020. This seems unlikely to be the last word as this already tight timetable may be overcome by the plan being out of date and of course the Corona virus crisis affecting everyone involved.

- These problems are further illuminated by consideration of the housing development sites known as North and North West Abingdon (see following details)

With NNGO's focus on proper balancing of economic, environmental and social considerations; local democracy controlled by locally elected and accountable councillors; and environment and rural sustainability putting landscape, nature and rural communities at the heart of decision-making, we were concerned about this imposition of excessive growth and centralisation by Whitehall. We are concerned that the 'Arc' pressure means that planning history will repeat itself in the next local plan for the Vale of White Horse. We think that local people and organisations must be consulted about the overall level of growth.

Appendix 1 North and North West Abingdon housing developments

NNGO's concerns can be further illustrated by considering the example of two sites in the existing Vale Local Plan (Part 1) – North and North West Abingdon.

- Local concerns about the North site focused on its being in the Green Belt, which should remain permanent and open, not least to protect the setting and character of Abingdon. There were other concerns, particularly about the high growth rate planned,

traffic and the Lodge Hill slip roads. Also, about the effect of extra traffic on air pollution in Abingdon. These broader concerns were generally ignored to meet the excessive growth pressures. Some local comments were picked up with improvements promised on roundabouts at either end of Dunmore Road. Also, good pedestrian and cycle links to the site are underway, with pedestrian crossings at key points. And a noise reducing bund along the A34. However, comments on traffic were not possible until comprehensive estimates of the extra traffic emerged when the outline planning application was submitted – too late for locals to analyse and object. Many complaints about the difficulty of safely joining Dunmore Road (which is a bit of a race track) were ignored. We continue to believe that a roundabout is needed where traffic from the Local centre (the main entrance to the estate) meets Dunmore Road. Also, only a small meeting room will be provided in the Local Centre (probably too small for most social purposes) and the large sports provision will be at the far eastern end of the estate and may lack necessary management.

- So, in the Vale Local Plan, it was agreed that the North Abingdon site would have around 800 houses and the North West Abingdon site would have around 200 (Appendix (i) of the plan). Both sites were in the Green Belt.

- Outline permissions for the sites were for 900 homes and 50 retirement homes for North Abingdon and 200 homes (just in the part North of Wootton Road, not the triangle of Land between Wootton Road, Copenhagen Drive and the A34) for North West Abingdon. Remarkably, a figure of ‘around’ 1,000 has now increased to 1,150 at least. This is a 15% increase, which will no doubt noticeably increase additional rush hour traffic on the roads.

- At the Part 2 EIP, the developers promised that the two sites would build:

109 houses or flats in 2017/18, and
121 in 2018/19, and
120 in 2019/20

So, there should have been 350 by April 2020. In fact nothing has been built by April 2020. Three years later, there is no sign of preparatory work on the roads and other infrastructure that needs to be in place before houses can be built.

- The Vale’s Housing land supply statement for 20194 says that in 2020/21 25 houses are expected on the N Abingdon site, but none on the NW site. It seems very unlikely that any homes will be built in 2020/21, given the amount of investment needed to get started and the current economic disruption. So will another year pass with no

		<p>development?</p> <p>Thus, does the 15% increase in house numbers compared to the plan mean that 15% too much land has been zoned for building across the Vale? Does the lack of building mean that in practice, there was little need for these houses or that the economic assumptions behind it have proved wrong? Why was the Green Belt sacrificed so quickly?</p> <p>In short, it is pointless consulting the public about the next local plan if you have already decided that you will zone land, often on the green belt, for far more houses than we will ever need – as happened in the last local plan. Nor do we think that building expensive new houses will sort out affordability problems. So, please reconsider your approach to consultation and the current focus on there being even more growth because we are in the 'Arc'.</p>
31	ID: 139225620	<p>The below response was received via email from Savills on behalf of Thames Water:</p> <p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewage undertaker for the area and is hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012.</p> <p>General Comments New developments have the potential to increase the requirements for water and wastewater infrastructure. Thames Water will deliver any necessary network reinforcement works required to support new development which will be funded by the Infrastructure Charge. However, the timescales for delivery of new infrastructure can be significant. In order to ensure that development is aligned with any necessary water and/or wastewater infrastructure upgrades necessary to support the development, and to minimise the need for phasing conditions to be sought on planning approvals to prevent the occupation of development ahead of the delivery of any necessary network reinforcement works, developers are encouraged to discuss their proposals and infrastructure requirements with Thames Water at an early stage.</p> <p>As such we would welcome inclusion of text within the SCI encouraging applicants to seek pre-application advice from Thames Water to discuss water and wastewater infrastructure requirements ahead of the submission of any application. Further information for developers and land promoters on pre-planning enquiries can be found at: https://www.thameswater.co.uk/preplanning</p>

		<p>A copy of this link could be included in the SCI or on the local authorities website on the pre-application page to encourage developers to utilise Thames Waters pre-application service.</p> <p>Encouraging developers to engage with Thames Water would accord with Paragraph 40 of the NPPF which states that local authorities should, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.</p> <p>I trust the above comments will be given due consideration, but please do not hesitate to contact Stefania Petrosino at the above number if you have any queries.</p>
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