



Campaign to Protect  
Rural England  
OXFORDSHIRE

CPRE Oxfordshire  
Punches Barn  
Waterperry Road, Holton  
Oxfordshire  
OX33 1PP  
01865 874780  
campaign@cpreoxon.org.uk  
www.cpreoxon.org.uk

25 November 2011

Laura Howard  
Planning Officer  
Vale of White Horse District Council

Dear Laura Howard

### **Consultation: Interim Housing Supply Policy**

Thank you for the opportunity to comment on this policy. The following response is submitted on behalf of the Campaign to Protect Rural England Vale of White Horse District.

CPRE **strongly opposes** the Vale's interim plan to open villages to what could be injurious and undesirable development. In particular, we consider that any policy to relax building constraints on greenfield sites should provide **complete protection of the AONB, as well as the Green Belt.**

We also question whether any policy to relax building constraints is in fact now necessary, in face of recently published information demonstrating that the stalled building operations on such major sites as Grove have recommenced in earnest.

#### **THE DETAILS**

CPRE fully understands that the Interim Housing Supply Policy is designed to deal with a temporary shortfall in the Vale's five-year housing supply, and further that a major contributory factor is the delay in developing major sites at Grove and Didcot.

CPRE is extremely concerned that planning regulations protecting greenfield sites will be relaxed in order to encourage quick development, with little consideration given as to whether towns and villages have the necessary infrastructure and facilities to accommodate it.

In particular:

- We are concerned that this is based on a first come, first served approach, rather than a proper exercise which looks at the towns and villages in the Vale and identifies the best sites, both in terms of supporting rural services and in environmental terms - there is little emphasis in the document on the criteria that will be used to determine site suitability.
- Larger towns have been excluded from this process - sites there would better meet planning criteria, such as availability of services.
- We are **strongly opposed to the relaxation of Policy GS2** which currently prevents housing on sites outside the defined settlement boundary of the towns or the built-up area of larger and smaller villages, as we consider this policy an

essential ingredient in the protection of the countryside and the character of its settlements.

- The idea of proportionate growth – which is really just “planning by ratio” - is without merit as there is no mechanism for demonstrating that the current population is the ‘ideal’ base from which to work. If the aim is to support rural facilities and services, individual villages should be surveyed to determine whether local services will be at risk in the absence of growth, and new housing should be focused where a defined local need exists.
- In many cases, **infrastructure is failing to catch up with recent development**; for example, the availability of places in primary schools in the Wantage area, including many neighbouring villages, has failed to keep pace with building in the last couple of years. Such considerations are central, yet the figures produced, giving ‘potential’ sites, do not in any way reflect them. In some places, therefore, recent local population growth can give good reason to avoid building in such areas. The basis for the suggested availability of sites is here, and in many other ways, critically flawed.
- In particular, we believe there is no sensible way of moving forward on building in villages without having a **full, up to date survey of both needs and site availability** in all the settlements concerned.
- The proportion of affordable housing tends to be greater in larger developments. If the policy is changing to consider more, smaller developments, what impact is this likely to have on the overall provision of affordable housing?
- In general, the provision of infrastructure is closely related to '**sustainability**', a subject close to the Government's heart. However the proportionate approach, when applied to smaller settlements, rides full-face against it.

The exact issue that major sites might be delayed and villages targeted instead was fully considered at the original Local Plan Inquiry and was dismissed by the Inspector who said *‘Reallocating new housing development around the area’s villages to reduce the amount in Grove would not only be directly contrary to the plan’s strategy and the PPG 3 search sequence but also result in a less sustainable pattern of development across the district and should not be contemplated for these important reasons.’*

- Green Belt and AONB policies must not be relaxed and we will want the District Council to make this clear, especially in relation to the North Wessex Downs AONB.

## **CPRE SUMMARY & PROPOSAL**

We are **wholly against any relaxation of Policy GS2**, which prevents development outside settlement boundaries, without:

(i) Compensating **strong protection for** the landscape in its fullest sense, including in particular **the AONB, as well as the Green Belt.**

(ii) **A full-scale survey of sites in all,** and not just the larger, **villages.**

(iii) Providing **details of the current availability of building land,** in particular of smaller plots in the major settlements, which are more likely to be brownfield sites.

This is to ensure that any **development** forced upon the Vale by legislation to enforce targets can only occur **on generally agreed and prioritised sites.**

Up and down the country, the likelihood of meeting building targets has become unlikely just because developers are finding it difficult to raise capital. What can only be a quick fix and temporary ‘solution’, and one dependent on permanently damaging our countryside, has to be strongly resisted.

What we write above provides, in our view, a prescription for tackling the matter more appropriately: provide complete protection to our most important landscape assets, make a detailed survey of all possible building sites, in towns and villages of all sizes, incorporate the realisation that targets must be reduced or capital injected, and then make a prioritised plan.

Yours sincerely

Peter Collins  
(Dr P.J. Collins)  
Chairman  
Campaign to Protect Rural England  
Vale of White Horse District