

Vale of White Horse Local Plan 2029 Part 1 – CPRE comments

Submitted on behalf of CPRE Vale of White Horse District Committee

Introduction

The increase in the number of homes in the Vale between 2006 and 2029 of nearly **30%** will cause serious and irreversible damage to the Vale as a ‘beautiful rural district... and a desirable place to live’ (Local Plan 2029 Part 1 (‘the Plan’) foreword). **CPRE asks the Council to adopt a less disproportionate development programme.**

The Plan lacks transparency. In particular, in order to support its claim of being sound and robust, it should be explicit about

- the policy-led increase in population underlying the growth in housing and the substantial inward migration to the Vale involved
- the impact of growth on air, light and noise pollution described in the Sustainability Appraisal (‘SA’) but omitted from the current version of the Plan
- the shortfalls in necessary infrastructure, and especially education and improved transport arrangements, that are inevitable during the Plan period.

The Plan has too many ambiguities. Throughout the text, statements are qualified by weasel words that nullify virtuous intentions (about involving local communities, providing infrastructure, protecting and enhancing the Vale’s heritage etc).

We commend the Council for retaining many saved policies from the 2011 plan – especially where they provide protection to the natural and built heritage and reassurance to Vale residents. We strongly advocate their extension into Part 2 of the Plan as key elements of the detailed planning policies to underpin the Core Policies.

We note officers’ assessment that a number of saved policies are not consistent with the Framework and that others are out of date. But we are seriously concerned that a number of policies noted as consistent with the Framework are nevertheless not listed among those to be saved. In some cases they provide important safeguards and conditions in language more categorical than used in the Plan. Others give expression to the importance of avoiding harm through development to the natural and built heritage of the Vale and its inhabitants. The protection they can provide is invaluable.

We request the Council to review the saved policies and to reinstate all those that are not inconsistent with the Framework or ‘out of date’. We further suggest that those policies deemed out of date because of the absence at present of a five-year housing land supply should be formally listed for reinstatement.

An important example of a consistent but no longer saved policy is policy DC8 which sets out in uncompromising terms the need to ensure that necessary infrastructure is in place or that it will be provided in time to meet the needs of residents in new developments. As currently drafted, **the Plan’s approach to the provision of**

infrastructure gives no room for confidence that the current inadequacies (in roads and education in particular) will not be compounded by further delays in supporting housing development.

The Plan should place more emphasis on the re-use of brownfield sites in preference to further encroachment of the Vale's rural assets.

Our concerns will be amplified in our answers below to the questions which we have been asked to consider.

We have cooperated closely with the Small Villages Alliance (SVA) in considering the Plan. We have also kept in close touch with the Western Vale Villages (WVV) group. However, our concerns are for all the communities in the Vale and for its rural and cultural heritage as a whole, and our comments below are put forward on that basis.

Question 1

Do our policies provide a clear indication of how a decision maker should react to a development proposal? Please identify any that do not, suggesting how they could be improved

No.

We strongly support the Council's view of the Vale as a beautiful rural area and agree that the historic environment of the Vale is 'of immense value but finite, irreplaceable and especially vulnerable at times of change' (Topic Paper ('TP') 8 para 3.54). However the policies do not adequately protect those qualities because they do not give sufficient weight to strategic objectives 10 and 11 (natural environment and heritage). We will give examples where they should be given higher priority and greater prominence in our answers to questions 6, 7 and 16.

The principle that new development must be accompanied by appropriate infrastructure is vital. A number of weasel words are used ('as a last resort', 'wherever possible' 'seek to ensure') that detract from the principle. We will give examples in our answers to questions 6, 8, 14 and 16.

We believe that decision makers should always consider whether a development proposed should be located on a brownfield site, in order to minimise the intrusion of building into the countryside. **We are concerned that the Plan does not appear to be fully committed to finding suitable brownfield sites in helping to meet the Vale's housing requirement.** There are passing references to the use of brownfield sites but the only sites detailed in the Plan are those brought forward from the 2011 Plan (see page 67 para 5.28). By no stretch of the imagination can these sites be regarded as previous use land and they have little or no potential for housing development. We understand that suitable brownfield sites are actively being sought, for example, by means

of the Strategic Housing Land Availability Assessment, and assessed as being suitable for housing development.

The Plan rightly emphasises the need for the countryside to be protected from inappropriate development, but in our view the Plan also needs to demonstrate that the VWHDC will give priority to the identification of brownfield sites and their allocation for housing development over the whole period covered by the Plan.

Question 2

Do you consider that the plan in its current form would meet the tests of soundness [objectively assessed, justified, deliverable, consistent with national policy] summarised below? Please identify any significant areas where you consider the plan unsound, indicating what changes or further work you suggest are required to make it

No.

There is not at present a current objective assessment justifying the bizarrely precise housing target of 13,294 homes to be built under the plan between 2006 and 2029. The number is a hand-me-down from the now revoked South East Plan and has not been arrived at in accordance with the principles of localism. The Plan should be based on a locally produced and up to date assessment of local needs. The Council should not be bounced into accepting numbers higher than appropriate for those needs, and we shall examine the forthcoming updated Strategic Housing Market Assessment closely to see whether it meets that requirement.

The housing plan would represent an increase of nearly 30% over the 2006 figure (13,294 against a starting figure of some 48,000). Its derivation appears to reflect predominantly:

- the need (which we do not dispute) for a large increase in affordable (ie publicly supported) housing, and
- a political and/or commercial judgement(which is open to debate) that subsidised housing cannot constitute more than 40% of all new housing.

So the total is not a judgement of how much new housing will be needed on existing trends (TP4 para3.7) but a figure inflated to accommodate a surge in net migration associated with accelerated development largely designed to help meet needs in the subsidised sector of the housing market. We doubt the validity of that methodology and ask that it be reconsidered.

The Plan as it stands should be transparent in identifying the promotion of net migration into this rural area as a Core Policy adopted by the Council (even if that policy has emanated from national policy). Paragraph 3.8 of TP4 (Housing) gives trend-based ONS projections that imply a population increase in the absence of policy interventions of about 10% between 2006 and 2029, from some 118,000 (our

interpolation) to 129,600 in 2029. The Plan housing figure would accommodate 140,300 – an **extra** net inward migration of some 11,000. **The ONS figures published recently on the basis of the 2011 census appear to confirm and perhaps increase the disparity.** We believe that the desirability and sustainability of such a level of inward migration should be explicitly examined and justified in the Local Plan – at present it appears to be the balancing item from the methodology described in the previous paragraph. Its effectiveness in helping meet the problem of social housing is also questionable, **since the increased population will itself generate an increased requirement for social housing** – creating future liabilities to meet present needs like the Ponzi schemes that have caused problems in the financial sector.

The housing target of 13,294 new homes is the lowest of the options discussed in TP 4. **Our concerns about the target would be felt even more strongly in relation to the higher options.** But the Plan is defective in failing to consider alternative lower options. In particular, it should explore the sustainability of:

- A ‘trend based’ case, meeting the needs of the population forecast on current trends by the ONS in the absence of policy-led net migration.
- Limiting the number of total houses by allowing an increase in the proportion of subsidised houses within approved developments

In our view the growth envisaged in the Plan is not consistent with an important element of national policy, since national guidance states that ‘the planning system should **contribute to and enhance** the natural and local environment by protecting and enhancing valued landscapes’ (Plan para 6.120 – our emphasis).

Question 3

The Vale of White Horse Local Plan 2029 will comprise Part 1: Strategic Sites and Policies, and Part 2 : Detailed Policies and Local Sites. Before Part 2 is adopted we will continue to rely on the saved policies of the Local Plan 2011 (adopted 2006) listed at Appendix F. Is there anything else that should be included in Part 1 of the Local Plan?

Yes.

1. Part 1 of the Plan should include the analyses proposed in the answers to questions 1 and 2 above
2. As noted in our answer to Question 4 below, **Sustainability Objective 9 (‘Reduce air, noise and light pollution’) in the SA has been suppressed in the Plan. It should be restored. There should therefore be an extra Strategic Objective:**

‘Strategic Objective X: To reduce air, noise, and light pollution’

(there also needs to be a core policy showing how that will be achieved in achieving the development proposals in the Plan).

3. There should be a Core Policy prioritising brownfield sites in order to minimise the use of agricultural or other greenfield sites:

‘Core Policy Y: Prioritising Brownfield Sites in order to minimise the use of agricultural or other undeveloped land

Before approving new development on previously unbuilt land, the Council will consider whether there is previously developed land available on which the development could be pursued and will give priority to development on such sites....’

4. We welcome and strongly support the Council’s intention to continue to rely on many of the saved policies of the Local Plan 2011, and equally strongly welcome the express intention to include the saved policies in the new Plan once adopted. **However, as noted in the introduction, we do not agree with the exclusion of a number of policies from saving**, especially where the officers’ assessment shows that the policy in question is consistent with the Framework. DC8 has already been mentioned. **Two other key examples are NE3 and NE4, the case for excluding which is not made in TP 9 (Table 2.2).** The absence of an overall strategy for biodiversity and ecology does not justify damaging important geological sites or harming protected species.

Other ‘Framework-consistent’ 2011 policies not continued into the Plan, the exclusion of which we regard as potentially damaging, are listed in Annex 1, together with a list of important saved policies that were not included in the officers’ assessment and which have not been continued into the Plan. As noted in the introduction, we argue strongly for the urgent review of all these policies with a view to their inclusion in the list of policies to be saved in the Plan period.

Question 4

The Sustainability Appraisal accompanies the plan and will be published on 28th March. It appraises options for a number of policies and alternative strategic site options. Do you have any comments on the findings of the Sustainability Appraisal? Are there any other alternative options that should be subject to Sustainability Appraisal? Is there anything else that should be included in Part 1 of the Local Plan?

It is very unhelpful that the SA ‘sustainability objectives’ do not match in content or even in number the ‘strategic objectives’ in the Plan. It makes cross-reference unnecessarily difficult and laborious for the reader. More seriously, it appears that **two important sustainability objectives in the SA are not translated into strategic objectives in the Plan:**

- First, the SA correctly specifies education as a sustainability objective, which in the Plan appears to be submerged in Strategic Objective 4 (health and well-being);

- Second, also correctly, the SA identifies the minimisation of light, air and noise pollution as a sustainability objective, which does not appear at all in the strategic objectives, or very much elsewhere in the Plan. **Given the evidence in the SA that the development policies in the plan are consistently harmful to air, light and noise pollution, we regard the omission of this objective from the strategic objectives as a serious oversight.**

While the ‘red amber green’ methodology used in the SA provides a useful summary of the interaction of objectives and policies, it is undermined by its propensity:

1. **to allow for ways of mitigating the perceived harm of particular objectives for individual policies (and to recategorise the harm in doing so).** So, for example, the authors suggest landscape and heritage damage caused by development under the plan will ‘likely’ be neutralised by good design (SA Table 24.10 entry 3). In a less serious context, we would advise the authors to tell that to the marines. We will content ourselves with pointing out that **it is obviously and damagingly inappropriate to assume that design will be good. The inherent harm should be shown at its unadorned face value in the SA.**
2. **to claim credit for the beneficial effects of other policies in the plan to offset the harm ascribed to the policy being assessed** (see for example Table 24.11 entries 2,4,5,6,14,17 etc). Each should be assessed in the first instance strictly on its own merits, and **it is imprudent to take credit at the outset for the success of as yet undelivered policies.**

We believe that as a result of these defects the **impacts of policies on strategic (or sustainability) objectives are systematically skewed in the SA** to be more positive than they should be, and that it should be critically reviewed. **Even so, it is highly significant that the final two paragraphs of the SA sound notes of substantial concern about the harm that will be caused by the Plan to the Vale’s countryside and its natural resources.**

Question 5

Do you have any comments on Chapter 1?

No.

Question 6

Do you agree with the key challenges and opportunities we have identified? Yes/No – if no what have we missed?

(In reading the answers to this and subsequent questions, the reader should regard them as always qualified by our belief that the total increase in housing proposed in the Plan is excessive)

No.

P21 The **vitality and sustainability of rural communities should be given more emphasis** by transferring the last ten words of the last dot point to a new dot point. The last three dot points would then read:

- *providing high quality and accessible services and facilities as part of new development when they are needed, so existing and new residents can enjoy a good quality of life*
 - ***maintaining and improving the attractiveness, vitality and sustainability of existing rural communities***
 - *helping to retain existing, and where appropriate, promote enhanced services in villages, and to facilitate the delivery of new services*
- (Emphasis to show change)

P25 The key challenge of **reconciling economic growth with environmental and heritage assets is ignored**. There should be a dot point early in the list as follows:

- *ensuring that economic development does not have adverse impact on the District's natural and built heritage, environment and biodiversity*

P25 In the interests of transparency a hidden key challenge – **the provision of employment to meet the needs of a net inward migration of 11,000 by 2029** – should have been included.

P27 The key challenge of **reconciling new roads with the environmental and heritage assets is ignored**. There should be a dot point early in the list as follows:

- *Ensuring that of transport development does not have adverse impact on the District's natural and built heritage, environment and biodiversity*

P27 The second dot point under transport should be strengthened to read:

- *continuing to work with partners to address the capacity constraints so as to ensure that new development **does not aggravate congestion or worsen** safety on the road network*
- (Emphasis to show change)

P29 The first dot point should be strengthened by the addition after ‘AONB’ of a reference to other locally valued landscapes so that it would read

- *maintaining and enhancing the rural character of the Vale and its landscape qualities including the AONB and other valued landscapes such as the Corallian Ridge and the Thames river frontage*
(Emphasis to show change)

P29 **The environmental challenges do not refer to the threat of air, light and noise pollution.** An additional dot point should be added:

- *protecting the Vale, its residents and its communities from further increases in air, light and noise pollution*

(Note that the SA (Table 2.15) strongly suggests that this threat cannot be overcome if the Plan goes forward in its present form.)

P35 The weasel words ‘**wherever possible**’ **must** be removed from Strategic Objective 9. **If sustainable transport choices are not available and provided for in the proposals for a new development it should not go ahead.**

Question 7

Do you support our Spatial Vision for the District set out in para 3.5? Yes/No - if no what would you change?

No.

This is one of the passages referred to above (Q1) which understates the importance of the Vale’s heritage, in this case by using it to qualify new development rather than giving it a separate paragraph. We suggest reorganising the Spatial Vision as follows:

‘3.5 The Spatial Vision developed for the Vale Local Plan 2029 Part 1 is:

By 2029 the Vale of White Horse will have thriving and prosperous communities that have benefited from economic growth and where our strength in science and innovation continues to be recognised internationally. The Science Vale UK area will have become a first choice location for high value added business and research. New residential and economic growth will have been focused on the Science Vale UK area and will have delivered balanced and sustainable growth that has made a significant contribution to delivering important infrastructure. Strategic road improvements will have been implemented at Harwell, west of Didcot and at Wantage.

‘The Vale’s main settlements will provide healthy and sustainable communities where everyone has a decent place to live and work with good access to leisure and community services and facilities. The service centre roles of Abingdon on Thames,

Botley, Faringdon, Grove and Wantage for the surrounding rural catchment areas will have been maintained and enhanced. The Vale's villages will continue to provide thriving rural communities where appropriate growth has supported local services.

The Vale's outstanding and distinctive natural and built environment will have been protected and enhanced, as will its AONB, Green Belt, and other valued landscapes, so as to preserve its (deletion) heritage

New development will have respected the local character of the Vale, will have achieved high environmental standards and will also be more resilient to the likely impacts of climate change'

(Emphasis to show change)

Question 8

Do you support the Strategic Objectives for our plan? Yes/No - if no what have we missed?

In some cases, yes.

However they **are incomplete and lack transparency since they do not include the following objective**, which is the concealed major policy underlying the level of development proposed:

'Strategic Objective 1A: Provide housing and employment for a policy-driven net inward migration of 11000 people above ONS trend-driven forecasts in the period 2006-2029'

(We disagree with the policy and the objective; but they should not be disguised from the communities which will be affected by them.)

Strategic Objective 3. Development must not just **reflect** the built and natural environment, it must **protect and enhance** them (cf Plan para 6.120). The objective should read:

*Strategic Objective 3: Direct growth to the more sustainable locations in the district and ensure that development is integrated with existing communities, **protects and enhances** the built and natural heritage, and is supported by a sufficient range of services and facilities.*

(Emphasis to show change)

The Strategic Objectives should match the SA sustainable objectives (see Q3 above) by including:

'Strategic Objective X: To reduce air, noise, and light pollution'

Strategic Objective 9. The words 'and wherever possible' are an example of the weak approach to infrastructure provision referred to in our introduction. They should be

deleted; **new development must not go ahead if it is not accompanied by effective, timely and sustainable transport arrangements.**

We note that the key ‘outcomes’ listed in this chapter **are mostly not outcomes at all, but a list of continuing activities** that will be needed to deliver outcomes. In some cases they clearly imply that outcomes that should be prior conditions of the development plan (the provision of the necessary road improvements for example) will not be achieved until afterwards if at all – see Plan page 35 key ‘outcomes’ 3, 4, 5 and 6. **There is an acute danger that this will perpetuate and aggravate problems that have already arisen through shortfalls in the provision of infrastructure support for new developments.**

Question 9

Our vision and Strategic Objectives aim to promote opportunities for all across the district. Do you agree? Yes/No - if no please tell us more.

Yes. However that does not mean that we support artificially increasing opportunities to cater solely for extra inward migration.

Question 10

Do you support the Spatial Strategy for the location of development, including the Settlement Hierarchy, set out in para 4.8? If no, what would you change?

No.

As noted elsewhere we believe that the **further construction of 2,250 houses proposed at Wantage and Grove in particular is excessive.** More generally the figures in the Plan will undo the market town character of the main settlements, destroy the character of the larger villages and alter the rural nature of the Vale. Subject to that general point we give comments below and in our answers to questions 11-14 on the chapter on the Spatial Strategy.

Core policy 1: Sustainable Development

The second paragraph of this policy is too unclear to be used as a basis for policy. The phrase ‘material considerations’ needs definition – at present it seems to be capable of meaning anything that it suits planning committees to say it means.

Core Policy 2: Settlement Hierarchies

We accept that whatever development takes place will have to be focussed mainly on the major settlements, and welcome the Plan’s reinforcement of this approach.

We also understand the rationale that aims to secure and improve the infrastructure in larger villages by allowing some limited development where it can be accommodated without harm to the natural and cultural heritage. **We welcome and wholly support the statement in Spatial Strategy Core Policy 2 that ‘development will be limited to providing for local needs.’ We regard this principle as hugely important. However it is not at present carried through as it should be to Core Policy 3 (see below). This must be corrected.**

The welcome emphasis on local needs should be backed up, as in the discussion of rural exceptions (Plan para 6.18), by an acknowledgement that developments to meet local needs should have the support of the local community, as represented by the local parish council. **We also believe the plan should show what practical steps will be taken to ensure that such developments will be restricted to meet local needs. It is far from obvious that market-led developments will in practice benefit local people. In this context the non-listing of Saved Policies H17 and H18 (see Annex 1) – even though officers judged them consistent with NPPF – is regrettable and should be rectified.**

We support the intention to confine development in the smaller villages to levels necessary to meet local (and locally identified) needs. However **the weasel word ‘primarily’ must be removed from the phrase ‘any development...should be primarily to meet local needs’ in Core Policy 2. Development in the smaller villages should only be for local purposes.**

We welcome the exclusion of the open countryside and the smaller villages within it from development (but see our comment on the need for involvement of the communities in decision-making at Core Policy 19 under Question 16 below).

Question 11 – Core Policy 3: Housing Delivery

We are consulting on housing provision based on the South East Plan target of 578 homes per annum, as this remains part of our development plan until it is formally abolished. What are your views on this level of housing provision? (You can also comment on the other housing provision options we have tested set out in the Housing Topic Paper that will be published on 28 March 2013).

We regard the **reference to larger villages in this policy as needing substantial amendment to ensure that ‘sustainable development’ is qualified by a recognition that development should be for local purposes, as it is in paragraph 4.11 and Policy 2. The larger villages should not be included in one heading with the market towns and local service centres but should be treated separately in order to make the point clear.** As noted above the need to have local support for local development should be made explicit

As noted in the introduction, we regard the level of housing provision in Table 4.1 as excessive and destructive of the rural nature of the District. **It follows that the higher**

figures given in TP4 are worse (and in the case of Option B verging on the grotesque). As a matter of urgency an assessment needs to be made of a development programme that is closer to meeting the needs of the community of the Vale as it would grow in the absence of undeclared migration policies.

As we understand the figures, the 1055 houses within ‘Remainder to be identified’ are likely to be mostly outside the main settlements – presumably in the larger villages. **The planners cannot have it both ways; either development in the larger villages is necessary to meet the requirements of a centrally developed, top down plan, or it is to meet local needs. If the latter it is meaningless to allocate a target number to it:** local needs will emerge as a result of local developments as implied by the fourth dot point in paragraph 4.19, and not in response to a perceived shortfall in the Council’s targets.

We note with especial concern in this context that the shortfall ‘still to be identified’ in the Western Vale is almost 25% of the total allocation to that sub-area. Given its relatively light present population density, the effect of such a large addition having to be found outside Faringdon itself will be disproportionate.

Question 12: Core Policy 3 (continued)

Do you agree with the five strategic housing allocations proposed in the plan? If you disagree, where should we allocate land for the 5,150 additional homes required by 2029? (You may wish to review the alternative sites we have considered, set out in the Strategic Sites Selection Topic paper that will be published on 28 March 2013)

No – nor do we accept the assertion in the question that 5,150 homes are needed.

All of the sites with the possible exception of Harwell Science will intrude on and damage rural land – and Harwell is within the AONB. Three (Crab Hill, Harwell east of the A34 and Faringdon) are on prominent ground where the visual impact will be substantial. The fifth, Grove, will overwhelm an already sprawling ‘village’. However we accept that some land has to be sacrificed even if our arguments for less development are accepted.

Our strongest objections are to the proposed developments at Wantage (Crab Hill) and Grove (Monk’s Farm). Both are relatively remote from employment centres and suffer, in any case, from poor road and public transport links that are unlikely to be satisfactorily improved even if the infrastructure is delivered in a timely way (which seems very improbable).

Question 13 – Core Policy 4: Meeting Business and Employment Needs

Do you agree with the approach to employment land proposed in the plan? If no, what would you change?

No.

As noted earlier, the scale of development is predicated on a questionable and undeclared policy of substantial inward migration. Earmarking 143 hectares of land for employment development is designed to meet the needs of an extra 11,000 people at the end of the period – and in fact is alleged to offer the prospect of 14,300 extra jobs between 2012 and 2029 (some presumably filled by people outside the Vale – such as Didcot residents as well as from further afield). The SA (Table 2.15 entries 7-11) shows **how uniformly detrimental such an allocation of so much employment land will be for the natural environment, for the cultural heritage, for air, noise and light pollution, for greenhouse gases and resource use and for climate change.**

In the light of this further evidence of the inappropriateness – not to say unsustainability – of the Plan’s assumptions we reiterate our view that they should be modified downwards.

Moreover, even if this much growth was desirable, it is not obvious that it will be practicable to generate economic growth on this scale – and it would be folly to commit resources to the other aspects of the Plan without having secured the necessary economic structure to sustain it (especially given the economic downturn – see TP4 para 3.24). The only thing worse than Crab Hill full of occupied houses would be Crab Hill full of half built or empty houses on the Spanish model. **Whatever plan is adopted should have be subject to formal critical reviews at five year intervals to ensure that the Plan is not outgrowing its strength (see our comments on Core Policy 40 below).**

Question 14 – Core Policy 5: Providing Supporting Infrastructure and Services

Our approach to infrastructure delivery and funding is still in development. To help us complete this work, what are your views on the approach set out in Core Policy 5 and the Infrastructure Delivery Plan?

Core Policy 5 provides a spectacular example of weasel words that suck the sense from the objectives of the Plan. The first paragraph provides a brave absolute statement (which we wholly endorse) that all development must provide for the infrastructure necessary for it to be sustainably accommodated. The fourth paragraph destroys that logic by describing ways in which the development will be allowed to avoid doing so. It concludes with the wholly unacceptable proposition that refusal of an unsustainable development will be a last resort. **The paragraph needs to be deleted and the clear message sent to developers that they must not expect to avoid providing the infrastructure needed to make their developments sustainable.**

Paragraph 4.37 of the Plan has a similarly weak concession that ‘the requirement to provide new or enhanced infrastructure must not be so onerous as to render development unviable, taking into account other policy requirements such as affordable housing provision’. Taken at face value, that could create ghettos of affordable housing with no access to basic facilities. **The council should withdraw the paragraph.**

We are in general concerned that the Plan does not deal properly with the inadequacies for existing and future residents of the road system serving the Vale. There are already significant problems of congestion (noted in the plan) on the A34. But the A420, the A338 and the A417 are all under serious pressure. We note the Council’s decision not to place further strategic development at Abingdon because of road congestion and believe it should pause on further development elsewhere in the absence of clear and funded commitments to remedy the problems.

In the case of the A420, problems will be aggravated if the massive expansion proposed east and north of Swindon, for which no adequate traffic plan has been put forward, goes ahead. It is not at all obvious that the Plan recognises the need to make improvements before new developments go ahead. Indeed its first reference to the developments in Swindon is bland to the point of complacency (page 17 para 3); there is no benefit to be had for the western villages from the expansion of Swindon, **and the Council should be actively supporting the western villages in their campaign to minimise the harm with which they are threatened.**

Question 15

We have divided the District into three sub areas and devised strategies for each area. Do you agree with this approach and the levels of housing and employment development proposed for each sub area? If you disagree, what would you change?

Yes – as to the division of the District; no – as to the levels of housing and employment development proposed, for the reasons set out elsewhere in this response.

The text on the Green Belt and the associated Core Policy 9 needs amendment and strengthening. **The suggestion in the Plan (page 57 last paragraph) that there might need to be a review of the Green Belt during the plan period is not compliant with the Framework para 83 that Green Belt boundaries should be capable of enduring beyond the plan period.** We think that paragraph 5.26 should make clear that any perceived need to redraw the boundaries of the Green Belt during the plan period would be so exceptional as to require a formal review of the Plan as indicated by the Framework.

We suggest the following redrafting of Core Policy 9:

Core Policy 9: The Oxford Green Belt

*The Oxford Green Belt will continue to be protected to maintain its openness and open character. Development that is inappropriate to the Green Belt will not be approved. Development carrying any measure of harm to the Green Belt will not be approved **except in very special circumstances** where the scheme provides exceptional community benefits that cannot reasonably be provided elsewhere and outweigh the harm from the loss of Green Belt land.*

*Development on previously developed sites within the Green Belt should **where practicable reduce the impact of the site on the openness of the Green Belt** and the purpose of including land in it and in any case should not have a greater impact than the existing development. Proposals should:*

- i. ensure any new buildings would not exceed the height of existing buildings*
- ii. not lead to an (**deletion**) increase in the developed proportion of the site, and*
- iii. not have an adverse impact on the landscape.*

Question 16

Do you have any comments on each of the district wide policies 18-40?

We have comments on some of the policies as follows:

Core Policy 18: Affordable Housing

The final paragraph of this policy is too weak. The Policy should be redrafted as follows:

Core Policy 18: Affordable Housing

The council will seek to deliver affordable housing following the preferred hierarchy shown below:

- 1. On-site provision (with the exception of part units)*
- 2. Mix of on-site and off-site provision*
- 3. Off-site provision*
- 4. On-site provision and financial contribution*
- 5. Off-site provision and financial contribution*
- 6. Financial contribution*

*Off-site contribution and/or financial contributions for the provision of affordable housing in lieu of on-site provision **will not be appropriate unless:***

iii. it is not physically possible or feasible to provide affordable housing on the application site,

or

iv. there is evidence that a separate site would more satisfactorily meet local housing need and contribute to the creation of mixed communities.

(Emphasis to show change. We have not sought to correct the numeration error in the Policy as printed in the Plan)

Core policy 19: Rural Exception Sites

We endorse the protections proposed for smaller villages. This policy permitting exceptions to those protections should be made dependent on local consent as suggested in paragraph 6.18. We suggest that an extra criterion should be added:

‘vi. The development has the support of the local community as represented by the local parish council’

(See also comments on larger villages under ‘Settlement Hierarchy’ above)

Core Policy 21: Housing Mix

As indicated elsewhere, we consider that alternative housing mixes should be tested in order to assess the sustainability and practicability of a smaller total development programme.

Core Policy 24: New Employment Development on Unallocated Sites

The preference for development on re-used, converted or adapted existing buildings should not be confined to rural areas. Any use of brownfield sites to limit incursions into rural locations should be supported subject to the provisos itemised in the policy.

Core Policy 25: Change of Use

This policy as drafted is too inflexible and discouraging. **Any use of an otherwise derelict employment site that helps to minimise the impact of new development, subject to the standard provisos, should be encouraged.** The policy should be redrafted to read:

Core Policy 25: Change of Use of Existing Employment Land and Premises

The strategic employment sites, as listed in the sub-area strategies, form part of the district’s long term reserve for employment land and will be safeguarded for employment (B1, B2 and B8) uses. Alternative uses will be considered if they provide ancillary supporting services or meet a need identified through the local plan review process, or

exceptionally where a reassessment of the district wide 2013 Employment Land Review demonstrates that these sites are no longer needed over the full plan period.

*Elsewhere in the district, applications for the change of use of land or premises that are currently, or were last, used for employment purposes will be approved **if they reduce the need to use greenfield sites for strategic development** and at least one of the following criteria is met:*

i. there is no reasonable prospect of the land or premises being used for employment purposes

ii. the land or premises is unsuitable for business use on grounds of amenity, environmental or highway safety issues

iii. the land or premises has no long term or strategic requirement to remain in employment use, or

iv. the proposed use will be ancillary to the use of the land or premises for employment purposes

(Emphasis to show change)

Core Policy 29: Transport and accessibility

The natural environment, landscapes and built heritage should be given more explicit mention in this policy; sub-paragraph (v) talks only of amenities, which could cover a multitude of other issues.

Core Policy 31: Renewable Energy

The words ‘where they do not unacceptably impact on’ are inappropriately vague. We suggest the policy should read:

Core Policy 31: Renewable Energy

*The council encourages schemes for renewable and low carbon energy generation. Planning applications for renewable and low carbon energy generation will be supported **provided that they do not adversely affect:***

i. landscape, both designated AONB and locally valued

ii. biodiversity including protected habitats and species and Conservation Target Areas

iii. historic environment both designated and non designated assets

iv. the visual amenity and openness of the Green Belt

v. local residential amenity, and

vi. traffic generation.

(Emphasis to show changes)

Core Policy 34: Landscape

We support the spirit of this policy. We suggest that the key locally valued landscapes (for example, the Corallian Ridge and the Thames river frontage) should be identified in paragraph 3 of the policy.

Core Policy 36: Biodiversity

The qualification ‘or, as a last resort, compensated for’ in the second paragraph is unacceptable and should be deleted. **If a development would cause significant harm to biodiversity it should not go ahead.** Similarly the last two lines of the policy look dangerously open to debate; **the words ‘...the importance of the development outweighs the harm and...’ need to be deleted.** We suggest a reworded policy as follows:

Core Policy 36: Conservation and Improvement of Biodiversity

Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be sought, with a primary focus on delivery in the Conservation Target Areas.

*If significant harm to biodiversity resulting from a development cannot be avoided **or fully [deletion] mitigated[deletion]** then planning permission will be refused.*

*The highest level of protection will be given to sites and species of international nature conservation importance (Special Areas of Conservation and European Protected Species). Damage to nationally important Sites of Special Scientific Interest, Local Wildlife Sites, Local Nature Reserves, Priority Habitats, Ancient Woodland Protected or Priority Species, **locally valued landscapes** and Locally Important Geological sites must be avoided unless **[deletion]** the loss can be mitigated to achieve a net gain in biodiversity.*

(Emphasis to show change)

Core Policy 38: Historic Environment

We note from the SA (section 20.4) that the Council has opted for the laxer of two options. We consider that inappropriate and advocate the restoration of a requirement to preserve or enhance scheduled ancient monuments to the policy. The Policy should be redrafted as follows:

Core Policy 38: The Historic Environment

Development should sustain and enhance the historic environment, both above and below ground, and not detract from the significance of heritage assets or their settings.

*Development should make a positive contribution to the local character and distinctiveness of the historic environment using the Residential Design Guide SPD, as well as other relevant SPDs, as a basis for information on character areas, types and materials, **and should enhance or preserve any Scheduled Ancient Monuments that it***

affects. Development involving loss or damage to designated heritage assets and their settings will be resisted.

Non designated assets will be assessed on a case by case basis and will be conserved taking into account the scale of any harm or loss and the significance of the asset.
(Emphasis to show change)

Core Policy 40 : Delivery and Contingency

The policy is concerned only with under-delivery and **does not take into account the risk that economic and population growth may not be as large as assumed in the Plan.** As noted in our answer to question 13 above, there needs also to be a regular review to make sure that housing provision is not excessive. The policy's grammar is in any case erratic. It should be redrafted as follows:

Core Policy 40: Delivery and Contingency

The local plan will be formally reviewed every five years or more frequently if necessary. If policies are not delivered in accordance with the monitoring framework, or prove to be based on unfounded assumptions about economic or population growth, the contingency measures will apply.

If the Authority's Monitoring Report shows that allocated development sites and/or development to be brought forward through neighbourhood plans are not coming forward in a timely manner, we will consider:

- i. seeking alternative sources of funding if lack of infrastructure is delaying development, to bring delivery back on track*
- ii. [Deletion] mechanisms to accelerate delivery on other permitted or allocated sites*
- iii. identifying alternative deliverable site(s) that are in general accordance with the spatial strategy of this plan, through the Local Plan 2029 Part 2 or other appropriate mechanism; and if required*
- iv. a full or partial review of the local plan.*

If it becomes apparent that economic or population growth are not as high as assumed in the local plan, action will be taken immediately to reduce the rate of approved housing development, with particular attention to the need to avoid building unnecessarily on greenfield sites.

(Emphasis to show change)

Dr Peter Collins (Chairman Vale of White Horse District Committee CPRE)

8th May 2013

Saved Policies in the adopted Local Plan 2011 not listed in the February 2013 Consultation Draft of the Local Plan 2029, Part 1, pages 183-186

It is the CPRE's view that it is essential that the substance of certain of these Policies be retained, in order to ensure that the Local Plan 2029 be sound and robust. Towards this end, we are surprised that they have not been listed in the Draft, and wish the District Council to include the necessary provisions in the new Local Plan when finalised.

Certain themes recur, and we now list relevant Policies under appropriate headings. All of them were assessed by the District Council as consistent with the National Planning Policy Framework or were unassessed, which adds to our dismay at their omission.

We can understand why the District Council included these Policies in the Local Plan 2011 as important for ensuring proper development and protection of the Vale's treasured environment, and we consider their loss unconscionable.

A. Infrastructure: the great importance of DC8 is referred to elsewhere.

Assessed as 'fully consistent' with the NPPF: DC8, TR1, H10.

Unassessed: GS10, TR2, TR9.

B. Protection of the natural and historic environment and the open and rural character of the countryside (including reference to AONB, Green Belt, Conservation Areas, Nature Reserves, Sites of Special Scientific Interest, the Corallian Ridge, etc.), the character of a locality, the (fabric of) historic or listed buildings, geological and nature conservation sites; and from harm caused by telecommunications apparatus, display of advertisements, etc.

Assessed as 'fully consistent' with the NPPF: DC1, NE3, NE4, CF10.

Unassessed: DC15, DC17, DC18. HE2, HE3, HE6, NE1, NE2, NE5, CF6, T3.

C. Conditions to ensure other sound development principles: control of density of building, priority given to the use of poorer agricultural land first, 15% of new developments laid out as public open space, protection against harm caused by

creation of golf courses, protection against noisy and intrusive recreational activities, grouped accommodation to be built within walking distance of shops, etc.

Assessed as 'fully consistent' with the NPPF: H15, H19, H23.

Unassessed: DC11, L16, L17.

D. Meeting local needs in a sound way, as built in previously by the Vale and stressed in the NPPF and the Localism Bill.

Assessed as 'fully consistent' with the NPPF: H17, H18, S1, T1.

Unassessed: E22

8.5.13