

5 January 2016

working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Vale of White Horse Local Plan 2031 - Part 1 - Examination

RESPONSE ON MATTER 12 - District Wide Policies (CP1, CP22 - CP22 and CP37 - CP46)

We restrict ourselves to commenting on 12.1(a), 12.3(a) and (b), and 12.3(h) about which we have made representations before.

12.1(a) Presumption in Favour of Sustainable Development (CP1)

CPRE agrees with the Inspector that 'many of the issues already discussed (in Stage 1) are inextricably linked with those which will be considered as part of Stage 2'. We hope that, in this light, our continued reference to the major flaws in the Local Plan which follow from the District Council's uncritical acceptance of the SHMA figures, producing unjustified and ineffective policies, and to the accurate assessment of the economics and planning issues involved contained in Alan Wenban-Smith's independent report included in the material sent for Stage 1 will continue to be in the forefront of discussions. In our mind, this is of major, in fact crucial, importance.

A reading of the CPRE comments, underscored by the Wenban-Smith review, establishes:

- (i) The intrinsic unsustainability and unsoundness of the Oxfordshire SHMA;
- (ii) The failure of the SHMA to meet the sustainability requirements of the NPPF;
- (iii) The unsustainability of the District Council's use of the SHMA figures.

CPRE found nothing in the Statements presented for consideration for Stage 1, or in the Hearings discussions, to refute these statements.

12.3(a) Design and Local Distinctiveness (CP37) and 12.3(b) Design Strategies for Strategic and Major Development Sites (CP38)

Our chief concern is the protection of the rural landscape and historic towns from ill-designed major developments ('more than 10 houses') and the resulting unfortunate long-term impact on the environment. We have been dismayed by the approval of many poor developments in recent years and seek to have guarantees put in place to prevent recurrence of this ruinous, ugly and wholly inappropriate despoilment of the Vale's countryside. We cannot think of any major development that has been approved in the last five years which has not consisted of buildings of mediocre and uniform design. With the large number of major developments which could result from approval of the Local Plan, it is especially important to have meaningful controls to ensure that we are not faced in a few years with the modern equivalent to what has become known in some cities as ugly 'back-to-backs' becoming prevalent in our countryside and towns.

It is clear that neither the documentation provided by proposers for development, nor the Vale's own expert planning team, can provide the muscle to resist the bad design with which the District Council has been presented and too often allowed. The Design Guide does not provide enough muscle to cope with the matter; so, it is essential for the Local Plan to fill the gap.

One modification that should form part of an improved Core Policy is to insist that proposals for all major developments be subject to expert consideration from consultants **independent of both the proposers and the Council**, and that no proposal should be further considered without the independent consultants signing a 'Certificate of Quality' to guarantee the variety and quality of building design. The purpose of the Council should always be to avoid the uniformity and mediocrity inherent in current development.

Otherwise, we fear that the celebrated rural landscapes of the Vale, so well outlined in the draft Design Guide, will be unacceptably compromised.

NPPF, Section 7 'Requiring good design' (paragraphs 56-68) *'attaches great importance to the design of the built environment'* (excerpt from paragraph 56), and local planning authorities *'should consider using design codes where they could help deliver high quality outcomes'* (paragraph 59) and *'should have local design review arrangements in place...'* (paragraph 62). We hope that it will be **required that design codes and design review arrangements, together with the need to consult the public in full**, be put in place. It should also be required that *'control over outdoor advertisements should be efficient, effective and simple in concept and operation'* (paragraph 67).

12.3(h) Landscape (CP44)

The consideration of this Matter at the Hearings will follow that on the AONB and we shall not dwell on that here, but elsewhere. However, we recall Local Plan, paragraph 6.111, which paraphrases paragraph 109 of the NPPF, including the statement that *'the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes'* (our

bold). In this regard, it is not only the landscapes of the AONB and the Green Belt that are valued, so is greenfield land above brownfield land. Clearly, a number of the strategic sites included in the Local Plan are not chosen in line with the District Council's own statements in the Plan, let alone with the NPPF.

END