

 <p><b>Vale of White Horse</b> District Council</p>	<p><b>Proposed Modifications to the Submission Vale of White Horse Local Plan 2031 Part One</b></p> <p><b>Representation Form</b></p>	<p>Ref:</p>   <p><b>(For official use only)</b></p>
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Please return to the Planning Policy Team, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton OX14 4SB, or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than **Wednesday 14 September 2016 by 5pm precisely.**

This form has two parts –

Part A – Your Personal Details

Part B – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

## Main Modifications Consultation Form

The Vale of White Horse Local Plan 2031 Part 1 Schedule of Main Modifications includes a series of changes to the published Local Plan 2031 Part 1. These suggested modifications are being consulted on for a period of 8 weeks.

The Inspector is inviting comments on the proposed Main Modifications as part of the Examination process for the Local Plan 2031 Part 1. The Main Modifications have been identified by the Inspector as those necessary to make the Spatial Strategy and Strategic Policies contained within the Local Plan sound. The Inspector will consider all representations submitted to the schedule of Main Modifications consultation before publishing his final report.

### Submitting Comments:

Please fill in this form and return:

- Via email to: [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)
- By post:
  - Planning Policy
  - Vale of White Horse District Council
  - 135 Milton Park
  - Milton
  - Abingdon
  - OX14 4SB
- Comments must be received by **Wednesday 14 September 2016 by 5pm precisely.** **Comments received after this time will not be accepted and will not be considered by the Inspector.**
- Please complete a separate form for each Main Modification you are commenting on.
- Please clearly identify which Main Modification your comments refer to using the reference (i.e MM1) in the Local Plan Part 1 Schedule of Main Modifications.
- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. **Comments will only be considered that refer to a change as shown in the Local Plan Part 1 Schedule of Main Modifications.**

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## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title	Dr	
Last Name	Whall	
Job Title (where relevant)	Campaign Manager	
Organisation (where relevant)	Campaign to Protect Rural England (CPRE) – Oxfordshire Branch	
Address Line 1	First Floor	
Line 2	20 High Street	
Line 3	Watlington	
Line 4	Oxon	
Post Code	OX495PY	
Telephone Number	01491 612079	
E-mail Address (where relevant)	PRO@cpreoxon.org.uk	

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If you do not wish to be informed of future updates to the Local Plan or other planning policy consultations in your area, please tick this box

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PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE REPRESENTATIONS CANNOT BE TREATED AS CONFIDENTIAL.

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

Name or Organisation :

3. Please give the Main Modification reference your comment relates to.

Proposed Modification Number:

Main Modification reference –

**Chapter One, 1.28, Chapter Five, MM13, MM16 (5.41), MM16, Appendices – MM36 and MM37, and MM38 and Appendix 1: Map Changes, Fig.B18.**

4. Do you consider the proposed Main Modification addresses the following issues in relation to the policies concerned?

Legally compliant:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Positively Prepared:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Justified:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Effective	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Consistent with National Policy:	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

*Please mark as appropriate.*

5. If you have answered 'no' to any of the above please specify your reason for objecting below.

You should make it clear why the Main Modification is either not legally compliant and/or unsound explaining why the Main Modification is not:

- positively prepared;
- justified;
- effective; or,
- not consistent with national policy.

## PRELIMINARY COMMENTS

### Changes necessitated by changes in growth forecasts following the Brexit vote.

The Plan should reflect, as the NPPF insists, the economic constraints at the time it is approved.

The Vale Plan is to a great extent affected by the SHMA.

The SHMA relies on the economic projections constructed at the time the SHMA was itself approved.

Although there is uncertainty as to how the economy will turn out in the medium and longer term, in view of statements made by Government and in particular the Chancellor and his immediate predecessor after the Brexit vote, it is clear that all growth forecasts for at least the next five years are to be much reduced.

There is no alternative but to reflect that in the Local Plan. It would be contrary to the NPPF to ignore these changed circumstances, to pretend these changes in circumstances have not occurred and not to act now on these changes.

We regard it to be irresponsible, just because we do not know exactly just how the economics of the situation will turn out, to ignore all the indicators and to act as if the Brexit vote and the Chancellors' actions had not occurred.

So, CPRE considers that there is no alternative but to reconsider the SHMA and the economic forecasts on which it is built before any decisions are taken as to the distribution of strategic sites in the Local Plan.

The very least that is necessary, if there is any hope that the SHMA figures could in any way parallel reality, would be much to reduce what are, in any case, wildly exaggerated targets to much lower figures for five years, to give the economy a chance of recovery and to produce meaningful growth. Otherwise, housing will far outstrip employment opportunities, again contrary to the NPPF.

A start would be to remove all the proposed Green Belt sites from the Plan for at least five years.

However, irrespective of what action is taken on this issue, we ask the Council and the Inspector to support the following alterations to the policies as currently proposed (see Section 6).

(continue on a separate sheet/expand box if necessary)

### **6. Please set out what change(s) you consider necessary to make the Local Plan Part 1 Main Modification legally compliant and/or sound.**

**It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**Section 6 - Please see changes to be made below...**

## CHANGES TO BE MADE TO THE LOCAL PLAN MAIN MODIFICATIONS

### Green Belt

#### Chapter 1:

**1.28.** Delete “a full strategic review of the boundaries of the Oxford Green Belt”. It is not clear what “boundaries” means in this context but, more importantly, the extent of possible revisions for the Vale’s Green Belt to accommodate the Vale’s need are already decided and further review is unjustified and inappropriate; and Oxford’s unmet housing need is not yet quantified or crystallised and is not therefore a special circumstance justifying any review.

#### Chapter 5:

**MM13 iv.** We are uncomfortable with “safeguarding of long distance views of the site from Oxford” and suggest this should be “ensure that the site will be no more intrusive in views from Oxford, and aim to reduce its saliency.”

**MM16 5.41.** This gives the impression that the Inspector allowed land to be removed solely on the basis of a subjective assessment of the extent to which it met Green Belt purposes. This is not correct. Land was only released where special circumstances could be shown, these being the first consideration. We suggest rephrasing to:

*The Council intends to review a specified area of the Green Belt at Kennington, Radley and Abingdon in the light of the perceived special circumstance of housing need. In this review it will be guided by assessments within its own, and the County Council’s Green Belt studies.*

**MM16.** Add to paragraph as shown in italics:

Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4, *and where the openness of the Green Belt will not be reduced.*

#### Appendices:

**MM36 and MM37.** We note that the page no.s for the maps indicated are both wrong – they should be listed as p.60 (MM36) and 61 (MM37), *not* pp.61 and 62.

**MM38.** Delete ‘compatible’, and substitute with ‘appropriate’.

**NEW MM.** Ref CP23 (Housing Density) of Monitoring and Implementation Framework. *The capacity to increase build densities to the higher end of PPG3 or above, across all allocated sites, will be reviewed, with an objective to reduce land take for all sites and/or release some sites entirely from development, particularly those in the Green Belt.*

#### Appendix 1 To Schedule of Main Modifications: Map Changes:

**Figure B18.** We query whether the playing field gap between the Green Belt Review areas to East and West has defensible boundaries.

**7. Do you have any comments on the updated Sustainability Appraisal or Habitats Regulation Assessment Addendum in respect of this particular Main Modification?**

No

**PLEASE RETURN THIS FORM BY 5PM ON WEDNESDAY 14 SEPTEMBER 2016**

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representation(s). Further submission(s) will only be accepted at the request of the Inspector.*