

 Vale of White Horse <i>District Council</i>	Vale of White Horse Local Plan 2031 Part 2: Preferred Options Comment Form	Ref: (For official use only)
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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 no later than 5pm on Thursday 4 May 2017.

This form has two parts –

Part A – Your Personal Details

Part B – Your Comments

Local Plan 2031 Part 2 Comment Form

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. The aim of Part 2 is to set out:

- policies and locations for the Vale's proportion of Oxford's housing need up to 2031
- policies for the part of Didcot Garden Town that lies within the Vale of White Horse district
- detailed development management policies to complement Part 1 and replace the saved policies of the Local Plan 2011
- additional site allocations for housing.

This consultation is running for 8 weeks from **Thursday 9 March 2017 to 5pm on Thursday 4 May 2017**. All comments will be taken into consideration if submitted within the consultation time frame.

Submitting Comments

Please fill in this form and return by:

- email to: planning.policy@whitehorsedc.gov.uk
OR
- post to: Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Comments must be received by **5pm on Thursday 4 May 2017 precisely**.

Please complete a separate form (Parts A & B) for each Local Plan 2031 Part 2 Planning Policy, supporting text and/or Strategic Site you are commenting on.

Please clearly identify which Planning Policy your comments refer to using the reference (i.e. DP1 and/or Page or Chapter number) in the Local Plan 2031 Part 2.

Please do not repeat your previous comments. The council will review any comments you have previously submitted.

Part A: Your Details

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	<input type="text" value="Dr"/>	<input type="text"/>
Last Name	<input type="text" value="Collins"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Chairman, Vale of White Horse Committee"/>	<input type="text"/> (where relevant)
Organisation (where relevant)	<input type="text" value="Campaign to Protect Rural England (CPRE) – Oxfordshire Branch"/>	<input type="text"/> (where relevant)
Address Line 1	<input type="text" value="Sarsen Cottage"/>	<input type="text"/>
Line 2	<input type="text" value="Letcombe Regis"/>	<input type="text"/>
Line 3	<input type="text" value="Oxon"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="OX129JL"/>	<input type="text"/>
Telephone Number	<input type="text" value="01865 727796"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="pjcoll@maths.ox.ac.uk"/>	<input type="text"/>

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

Part B – Please use a separate sheet for each representation

Name or Organisation :

Campaign to Protect Rural England – Oxfordshire Branch

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. We would like to hear your opinions on:

- the policies contained within this Plan
- the additional site allocations
- any recommendations you may have for alternative sites
- any improvements to the Local Plan Part 2 supporting text or policies that you believe will help to improve/strengthen the Local Plan.

If you are commenting on more than one policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Core Policy 4a:
Meeting our Housing Needs

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 4a: Meeting our Housing Needs

The preferred approach set out in the draft Part 2 of the VWHDC Local Plan will continue the transition of the Vale from a rural area to one with large numbers of suburban dormitories, with residential development far in excess of the needs of the existing local community. CPRE objects strongly to many aspects of the draft and in particular to:

1. The unnecessary excess of preferred allocations over the requirement set out in the adopted Plan Part 1.
2. Unsustainability in terms of the NPPF requirement to locate jobs and housing in reasonable proximity.
3. The near-certainty that infrastructure changes will be inadequate to support acceptable transport, educational and other requirements in the preferred sites. **CPRE considers that Local Plan 2011 Policy DC8, viewed by the Vale as consistent with the NPPF and also consistent with the Local Plan 2031: Part 1, would provide an essential necessary clarification for inclusion in Part 2.**
4. The absence of any indication of phasing in the development programme.
5. The absence of a regular and frequent programme for monitoring the correlation of the growth of housing and the assumed growth in jobs .
6. The damage being done to communities, their heritage and their valuable landscapes.
7. The failure of the Council and its consultants to take any note of currently saved policies, despite their still being described as components of the Local Plan.
8. Lack of objectivity in the identification of preferred sites.
9. Lack of clarification of the effect of development on the Harwell Campus on the North Wessex Downs Area of Outstanding Natural Beauty (AONB), parts of which would seem to run wholly contrary to the NPPF.
10. Excessive proposed deletion of land from the Green Belt at Dalton Barracks.
11. The further damaging effect on two of the major towns, Abingdon and Wantage/Grove, is not considered.
12. The lack of appropriate agreements to ensure any likelihood of success of the Didcot Garden Town proposal.
13. The continuing support of the flawed strategy of imposing Park and Rides on rural sites between major settlements.
14. The inappropriate deletion of policies saved from the Local Plan 2011. **CPRE considers that the landscape protection given by some of the Policies saved from the Local Plan 2011 (all consistent with the NPPF and Local Plan 2031: Part 1) form an essential clarification of the Plan 2031.**

CPRE sees no way of avoiding the logic of the Sparsholt Parish Council submission: sites should only be regarded as 'suitable 'that are within the 'Settlement Hierarchy' Core Policy 3 of the LP 2031 Part 1. This would be consistent with PPG 018 Ref ID: 3-018-20140306, and 'guided by' the development plan.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above and below.

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

Not in this response.

Part A: Your Details

1. Personal Details*

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The Vale of White Horse District

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Planning Policy reference – PP:
Chapter Number:

Core Policy 8a:
Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe
Sub-Area

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 8a:
Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area

1. The Excess of Preferred Allocations

We note with regret that the strategic aim of building housing to the absurd level of 20,560 by 2031 was approved at Inquiry, and that the Vale's share of the burden of meeting Oxford's putative unmet need (2200 homes) has been added to that total – giving an adopted total of 22,760. That figure itself represents an addition of some 45% to the housing stock in 2011 of some 50,000 – far more than needed on previous demographic and policy trends and itself certain to damage the rural life of the District. However, the Council has seen fit – without itself showing the figures – to exceed that target by 1,958 (approximately: we see different figures in different places) in arriving at its preferred allocations, divided as follows:

Abingdon/OF 460

S.E Vale 1030

West Vale 310

We regard the failure to declare these surpluses as failing the test of transparency. The existence of the undeclared surplus is an unwarranted encouragement to developers to put forward unnecessary schemes.

In this regard, CPRE finds the allocation at Kingston Bagpuize (Fyfield) 600, NW Grove 300 and Harwell 100 wholly unacceptable (see below).

We also note that, of course, the the 1,400 dweligs allocated to the SE Vale were a re-allocation and to be taken as within the original 20,560 SHMA figure.

2. Unsustainability

The NPPF equates sustainability with the *'the timely delivery of sufficient land in the right locations to support growth and....coordinating development requirements such as the provision of infrastructure'; social – 'supporting vibrant communities through the provision of housing, the creation of high quality living and working environments and accessible local services; environmental – 'protecting and enhancing our natural, built and historic environment, using resources prudently...'*

The sites included as preferred allocations in the consultation draft fail these criteria in multiple ways. One 'sustainable' larger village would see its housing stock increase unmanageably by almost 150% from 800 in 2011 to 2,100; another is already an AQMA (Air Quality Management Area). A site (Fyfield, though specified by the Council as at Kingston Bagpuize) with no local employment growth within five miles and with massive traffic congestion at peak hours is described as having good transport links helping to minimise car use (sic) despite having been red-flagged by the Oxford Growth Board because of the inadequacy of its transport infrastructure. Developments are proposed in rural communities which are essentially urban in character and are described as such in the design templates. No account is taken of the importance of distinctive landscapes. The draft seemingly launches yet another attack on the integrity of the AONB through development at the Harwell Campus.

3. Infrastructure shortfalls

The discussion of infrastructure in the selection of the preferred sites is – almost comically – inadequate. Much of it sounds more like a wish-list than the funded programme that needs to accompany new housing developments. The discussion of a site (Fyfield) which would be completely non-viable without access to an already overcrowded A-road varies between 'may' and 'will' in discussing the feasibility of the necessary roundabout – and does not mention the consequences of that access for congestion and pollution both of which will need mitigation. Land is reserved to bypass a village (Marcham) with no clear indication that funds will be available for it.

CPRE does not see how the proposed methods, CIL plus specific grants, for providing the infrastructure which the NPPF requires, are satisfactory. The impression given in the draft Plan is

that, as long as the 5-year land supply target is met, the District Council will not insist on necessary provision of roads, highways and health facilities, etc. With such great development proposals, it is incumbent on the District Council to require that no development, or part of a development, can be occupied before the relevant infrastructure is in place. Indeed, even before any further development proposals are approved, it is necessary to put our roads in a serviceable condition and to ensure that there are more school, especially primary school, places available.

The Local Plan 2031 Part 1 provided many challenges to the infrastructure which it seemed less than able to fulfil in any reasonable time-frame. These are massively exacerbated by the Part 2 proposals and need surveys to determine the extent and timing of proposed development. **CPRE considers, in particular, that major surveys concerning the A34, A420, A338, A415 and A417 are now needed before any decision on the Part 2 proposals can go forward. We mention in particular the A420, between the merger with the A415 and the A338, and seek a full impact study (which is affected the proposal to allocate 600 houses at Kingston Bagpuize/Fyfield), and on the A338, between that merger and Wantage, impacted by much additional proposed development in the Part 2 proposals, where OCC Highways has only proposed a study as late as 2026.**

Indeed, before the Plan can go forward for Inquiry its feasibility needs impartial peer review.

CPRE also considers, in line with Part 2, page 80, paragraph 3.60 (*'The Local Plan 2031: Part 2 sets out additional detailed policies to complement those set out in the Part 1 plan'*), that an additional Policy equivalent to Policy DC8 in the 2011 plan, considered by the Vale as consistent with the NPPF, needs adding to the Chapter 3 discussions, viz:

POLICY:

DEVELOPMENT WILL ONLY BE PERMITTED WHERE THE NECESSARY SOCIAL AND PHYSICAL INFRASTRUCTURE AND SERVICE REQUIREMENTS OF FUTURE OCCUPIERS AND/OR USERS OF THE DEVELOPMENT ARE:

- i) AVAILABLE AT A SUITABLE STANDARD; OR**
- ii) WILL BE PROVIDED IN ASSOCIATION WITH THE DEVELOPMENT; OR**
- iii) CAN BE SECURED OR IMPROVED TO A SUITABLE STANDARD THROUGH AN APPROPRIATE FINANCIAL CONTRIBUTION FROM THE DEVELOPERS OR LANDOWNERS. SERVICES AND INFRASTRUCTURE MUST BE PROVIDED IN TIME TO ENSURE CO-ORDINATION BETWEEN THEIR PROVISION AND NEEDS ARISING FROM THE DEVELOPMENT. WHERE APPROPRIATE COMMUTED SUMS TO COVER MAINTENANCE WILL ALSO BE SOUGHT FROM DEVELOPERS OR LANDOWNERS.**

The exact wording is crucial and adds a necessary level of protection not yet apparent in the Plan 2031 so far.

4. Absence of phasing

The District Council and the Inspector appear to have a common understanding, that we do not share, that in order to satisfy the five-year housing supply requirement the Council must demonstrate that it has a sufficient housing supply to 2031 – 14 years from now. Perhaps as a result, we find no suggestion in the Plan that the housing allocations shown in the draft will be phased over the period of the Plan. In the absence of such a phasing scheme, it is only too likely that, once the Plan is adopted, the developers will bring planning applications forward as soon as practicable and in an uncontrolled sequence, with the risk of substantial mismatches between the putative growth in jobs and the availability of housing. This adds to the severe risk, to which we have drawn attention before, that much of the new housing will be taken up by people commuting to work outside the Vale or Oxford.

We note here a concern that more and more housing in the Vale is likely to be taken by those commuting outside the District or for investment purposes only, thus making it more and more difficult to meet local needs and sustain a vibrant community. We draw your attention to such reports as made front page news in The Times newspaper on Friday 7 April, titled 'Foreigners dominate market for new

homes', by Andrew Ellson, where it was stated that '93% of flats in one of Manchester's biggest housing developments had been bought by foreign residents or companies registered overseas'. The Vale has been, and we hope will continue to be, a particularly attractive place to live and work and it's communities deserve to be protected by the Local Plan 2031.

5. Absence of effective monitoring coupled with prescribed and timely actions in case of failure to meet expectations

Associated with our concern about the absence of any phasing of the proposed development programme is our belief that there needs to be a mechanism for calling a halt to premature development if the expectation of job growth far in excess of historical trends is not fulfilled. The consequence, as noted above, could be an undesirable growth in commuting outside the area, ghost estates with severe under-occupancy, or half-completed eyesores. We believe it is an urgent priority to establish the principle that FREQUENT formal audit of job growth against housing starts, with an ability to call a SWIFT halt to approvals if job growth falls short of expectation. (Note that this reinforces the need for a recognised phasing of developments within whatever allocations are finally adopted.)

6. Protection of communities and their heritage

Despite the NPPF sustainability criterion above, the Council has lost sight of the impact of the developments on the communities involved and their historic and natural heritage in its enthusiasm for the sites that have been identified, in some cases following several years of lobbying and preparatory studies by developers. Fyfield, on whose land 600 houses are proposed, has been air-brushed so totally from the picture that its name does not appear at all despite the impact on its natural environment, the reduction of the gap between it and the next village, and the impact in noise light and atmospheric pollution that the village will experience. The strongly deleterious effect on Shippon of the Dalton Barracks development is similarly discounted, as is the impact of the Marcham development on the community in the absence of a by-pass for the village. The Council's attitude gives a hollow ring to the sentiments expressed by its leader in his introduction to Part 1 of the Plan (*'...a special place...uniquely beautiful with a rich natural and man-made heritage.'*)

7. Failure to apply current planning policies

In Figure 1.1 of the draft Plan Part 2 a figure showing saved policies from the 2011 plan are shown as being part of the Local Plan until Part 2 is adopted (i.e. in December 2018 at the earliest). Despite that, it is clear that the Council's planning team, and their advisors, have tackled the site allocation using a methodology that excludes any reference to saved policies that provide protection from development. Policies NE7 and NE9, protecting the Corallian Ridge and the Lowland Vale respectively, are a case in point. By not mentioning the policies – and, it seems, encouraging the consultants to ignore them too – the Council is able to rely on anodyne and inaccurate comments (alternative facts?) about the environmental and visual impact of the proposed developments that result in absurd mis-statements about the overall acceptability of preferred sites. This approach is clearly inappropriate – we have doubts about whether it is legally acceptable.

8. Lack of impartiality

Detailed analysis of the way in which preferred sites are described, both in Part 2 itself and in supporting papers such as the Site Selection topic paper and the Landscape Capacity Study, suggests strongly that in the case of the preferred sites the question being asked is 'surely there is no reason not to select this site?' whereas in other cases the approach is more even-handed. We suggest that, before the material becomes evidence for the Inquiry, an independent assessor be asked to review the documentation carefully to see whether the evidence base can sustain a rigorous test of impartiality and fairness.

See comments above.

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See comments above.

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

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

Unsustainability

The NPPF equates sustainability with the '***the timely delivery of sufficient land in the right locations to support growth and....coordinating development requirements such as the provision of infrastructure***'; ***social*** – '***supporting vibrant communities through the provision of housing, the creation of high quality living and working environments and accessible local services***'; ***environmental*** – '***protecting and enhancing our natural, built and historic environment, using resources prudently...***'

The sites included as preferred allocations in the consultation draft fail these criteria in multiple ways. One 'sustainable' larger village would see its housing stock increase unmanageably by almost 150% from 800 in 2011 to 2,100; another is already an AQMA (Air Quality Management Area). A site (Fyfield, though specified by the Council as at Kingston Bagpuize) with no local employment growth within five miles and with massive traffic congestion at peak hours is described as having good transport links helping to minimise car use (sic) despite having been red-flagged by the Oxford Growth Board because of the inadequacy of its transport infrastructure. Developments are proposed in rural communities which are essentially urban in character and are described as such in the design templates. No account is taken of the importance of distinctive landscapes. The draft seemingly launches yet another attack on the integrity of the AONB through development at the Harwell Campus.

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3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Core Policy 8b:
Dalton Barracks Comprehensive Development Framework
&
Core Policy 13a:
Oxford Green Belt

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 8b: Dalton Barracks Comprehensive Development Framework

&

Core Policy 13a: Oxford Green Belt

SUMMARY

CPRE welcomes the fact that the Vale has recognised the need to re-use previously developed land, although in no way endorsing the housing trajectory that lies behind it. However there is no justification for taking the previously developed area out of the Green Belt and no exceptional circumstances justifying it.

The Council (at 2.42) appears to have taken the mere availability of the site as an exceptional circumstance for Green Belt release, as no other exceptional circumstance has been proposed.

The Housing White Paper clarifies what has always been understood to be the Policy, that authorities ***should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including optimising the proposed density of development.***

There is no evidence that this exercise has been undertaken.

However, in this case, there is no justification for a Green Belt release at all, since all of the proposed development could occur without affecting the site's Green Belt status.

It is Government Policy that a previously developed site in the Green Belt can be redeveloped provided the impact of the new development on its openness will not be greater than the old, and provided the land is not of high environmental value. It is our position that the number of houses allocated to the Dalton Barracks site could be comfortably accommodated without inseting all or any part of the site, and there can therefore be no very special circumstances for doing so.

For a Green Belt Review to be considered, there must be exceptional circumstances which "necessitated" it. For the reasons above no such circumstances exist.

Whether such circumstances might or might not arise in future is not relevant to a decision of whether to review the Green Belt at Dalton today.

The first consideration is whether it is necessary to release Green Belt land to accommodate the number of houses said to be needed, or whether they can be accommodated through redevelopment within the Green Belt.

The second consideration is in regard to the undesirability of releasing land at Dalton beyond the previously developed area, and whether or not there was a greater than proven demand for housing.

NPPF POLICY ON GREEN BELTS

79. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

*17.encourage the effective use of land by reusing land that has been previously developed (brownfield land), **provided that** it is not of high environmental value...*

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are...limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development....

Paragraph 89 also allows *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.*

Paragraph 83 *Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.*

Note: As clarified in *Gallagher Homes Ltd v Solihull Borough Council* [2014] EWHC 1283 (Admin), Hickinbottom J:

Preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a green belt boundary. [125]

For redefinition of a Green Belt, paragraph 2.7 of PPG2 required exceptional circumstances which "necessitated" a revision of the existing boundary. However, this is a single composite test; because, for these purposes, circumstances are not exceptional unless they do necessitate a revision of the boundary (COPAS at [23] per Simon Brown LJ). Therefore, although the words requiring necessity for a boundary revision have been omitted from paragraph 83 of the NPPF, the test remains the same.

THE AREA PROPOSED FOR RELEASE FROM THE OXFORD GREEN BELT

The Dalton Barracks site is stated to be 288 hectares. It is intended to develop 1200 houses on it, although a further 1800 (a total of 3,000) may be proposed in the plan cycle after 2031.

The Council's intention with regard to Green Belt Review is stated at para 3 in Core Policy 8b as follows:

The site is removed from the Green Belt in accordance with Policy 13a. The site area however contains a large area of land that will remain within the Green Belt and any development of this area will be limited to Green Belt-compatible development. This area will include a substantial Country Park located on the Western side of the site.

This statement is to put it mildly equivocal. Is it intended to remove all of the site from the Green Belt, and if so, how can a large area remain within it? Why would land need to be removed from the Green Belt if only Green Belt compatible development was intended on it?

It is assumed that the Council intended to say that of the whole Dalton Barracks site only a part of it is intended to be removed, which may be the area shaded on Figure 2.3, but this needs to be clarified for the avoidance of doubt.

The area shaded on Figure 2.3 is approximately 130 hectares. It is largely previously developed, although we would argue that a 16 hectare triangle in the North West corner is not.

Previously developed land within the Green Belt can be redeveloped without removal of Green Belt status providing the impact on openness is not (disproportionately) greater.

THE AREA REQUIRED TO ACCOMMODATE 1200 HOUSES

The Dalton Policy is silent on density of development proposed, although it does refer to "*mixed tenure homes and housing types that are genuinely affordable*". The following considerations are relevant:

1. Whilst there is no current Government numerical advice on densities, the Housing White Paper of March 2017 states that it is necessary to **make efficient use of land and avoid building homes at low densities** where there is a shortage of land for meeting identified housing requirements;
2. **PPG3, 57.** Required that *Local planning authorities should avoid the inefficient use of land. New housing development in England is currently built at an average of 25 dwellings per hectare but more than half of all new housing is built at less than 20 dwellings per hectare. That represents a level of land take which is historically very high and which can no longer be sustained. 58. Local planning authorities should therefore:*

- *avoid developments which make inefficient use of land (those of less than 30 dwellings per hectare net - see definitions at Annex C);*
 - *encourage housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and*
 - *seek greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors.*(Dalton is close to the A34 and to Abingdon).
3. Presently desirable Victorian Terraces were typically built at densities of 75 to the hectare.
 4. The overwhelming present demand for lower cost smaller 1 and 2 bedroom units is best satisfied by high density development.

Taking the mid-case of PPG3 would mean 40 dwellings to the hectare, say 5,200 within the Council's shaded area in Figure 2.3, or 4,560 within the smaller area CPRE considers to be truly "previously developed".

Arguably, given the Council's own stated position, that the requirement is for *housing types that are genuinely affordable*, densities at the higher end of the PPG3 scale, or even at Victorian terrace levels should be aimed for, meaning the capacity of the shaded "previously developed" part of the site would be 7,800 houses or higher.

It is clear that the area of the "previously developed" part of the Dalton Barracks site is several multiples greater than would be required to accommodate either the intended development of 1200 houses or the prospective 3000 which might be envisaged in some future plan.

It is assumed, though has not been tested, that the volume of the 1200 proposed 1200 dwellings would be not greater than that of the buildings presently on the site, certainly if the permitted level of infill had occurred.

CPRE does not consider that housing need is of itself an exceptional circumstance for the removal of land from the Green Belt, and also considers that the level of housing demand predicated in the plan is unreasonably high.

However in this case, since the housing it is proposed to build on the site is well within the capacity of the previously developed area, and redevelopment can be undertaken without affecting Green Belt status, there is no necessity to consider removal of the "shaded area" from the Green Belt and therefore no exceptional circumstance to justify doing so.

Neither is there any exceptional circumstance to remove the unshaded part of the site (if that is how Policy 13a is to be construed) as, firstly, only uses compatible with the Green Belt are intended upon it and secondly it would not be required for even the possible 3,000 houses which might be required in some future plan cycle.

Further, releasing that area or allowing development of the shaded area to "sprawl" out over it would be totally inappropriate as it would risk merging Abingdon, Wootton and Dry Sandford, and threatening the gap to Marcham, as well as encroaching upon open countryside, contrary to the key purposes of designating land as Green Belt.

See comments above.

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Part B – Please use a separate sheet for each representation

Name or Organisation :

Campaign to Protect Rural England – Oxfordshire Branch

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3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Core Policy 15a:
Additional Site Allocations for South East Vale Sub-Area

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 15a: Additional Site Allocations for South East Vale Sub-Area

The effect on Abingdon and Wantage/Grove

The additional development proposed in the areas close to these major settlements (Dalton Barracks, Fyfield ('Kingston Bagpuize'), NW Grove, Marcham and East Hanney), taken together with the development approved in the Local Plan Part 1, will result in considerable cumulative infrastructure impact. Reports on this cumulative impact are necessary; in particular, a full-scale survey is needed, giving flows of traffic at peak periods corresponding to various scenarios relating to the coming to fruition of the developments in Parts 1 and proposed Part 2 housing and the availability of funding. The necessity of phasing development is then likely to become apparent.

(a) The proposed development of 1200 houses at Dalton Barracks and Abingdon

Although this proposal is for a self-sufficient development with schools, community facilities, employment etc., it will undoubtedly have an effect on Abingdon as many residents will have to travel to employment in Oxford, the Science area at Milton, Harwell and Culham, and also more locally in Abingdon.

It is therefore essential that the necessary road infrastructure to carry this extra traffic is put in place **before** any houses are occupied in the proposed new development. Already Barrow Road and other connected roads, e.g. Long Tow, are severely congested at peak travel times.

Even if a primary school is included in the development there will also inevitably be extra demand for secondary school places in Abingdon schools.

Whilst CPRE is not against this development, if contained on the current airfield brownfield site, with suitable density, proper consideration needs to be given to providing the appropriate infrastructure.

(b) The proposed development of 300 houses on greenfield land north-west of Grove

The site lies south of the railway line, between the Monk's Farm development, a Strategic Site Allocation of 750 homes to the east, and Grove Airfield, which has outline planning application for 2,500 homes, to the south.

Over 6,000 houses are currently proposed for Wantage and Grove – bringing an estimated 14,000 people and about 9,400 cars to the area (approval has already been given to over 900 homes in the last 10 years; outline planning permission has been granted for another 4,400 homes; additional applications have been submitted for 200 homes; and Local Plan Part 1 includes a further strategic allocation of 750 homes at Monks Farm).

A key objective of the proposed homes in north-west Grove is to 'contribute towards infrastructure in the Science Vale Area', and specifically, to help fund the Grove Northern Link Road (GNLR). However, CPRE believes the contributions from the 2,500 homes on Grove Airfield and the 750 homes at Monks Farm should be more than enough to pay for this Link Road.

We are also concerned that the number of homes on this site could increase after the Plan period. The Plan says 'the allocation at North West Grove has the capacity to deliver considerably more housing, subject to appropriate infrastructure improvements. Housing which is in addition to the 300 homes is expected to be delivered after 2031.'

The proposed development at north-west Grove will have an adverse impact on the local infrastructure:

- It would bring additional traffic to the already congested A338 and A417, and to the busy town of Wantage, in particular to the historic Market Square (we note in Core Policy 18a that no additional land is preserved for future enhancements to the A338 or A417 around Wantage and Grove and that no further land is preserved for any cycleways through the South East Vale except at the A43 – we recommend at a minimum the preservation of land for a cycle route from Wantage to Harwell/Didcot).

- It would also put further pressures on local schools (which are already at capacity), leisure facilities, and local health facilities (the Wantage Community Hospital is temporarily closed and its future is uncertain).

CPRE welcomes the fact that there are no immediate plans for the Western Relief Road (except preserving the land required), meaning we might be spared more housing to the west between East Challow and Wantage, thereby protecting what is left of the 'green gap' between the town and village.

CPRE also welcomes the safeguarding of land (on both sides of the A338 north on and around the site of the former Wantage Road Station) for the re-opening of the railway station to serve Wantage and Grove (CP19a), providing the possibility for local people to travel to Oxford and Swindon and beyond for work, training and leisure (however we note that there is as yet no commitment from Network Rail for any works to open the station).

And CPRE welcomes the commitment by the Council to the restoration of the Wilts and Berks Canal and the safeguarding of the historic line from further development.

c) The proposed development of 100 houses in West Harwell Village

There is no justification for the allocation of 100 houses in West Harwell Village. The number is so small that it would be better removed completely, or added as a windfall allocation.

This allocation is also contrary to the footnote on page 123, which says:

“Development in open countryside will not be appropriate unless specifically supported by other relevant policies as set out in the Development Plan or national policy, as stated in Core Policy 4: Meeting our Housing Needs in the Local Plan 2031 Part 1.”

d) The proposed development of 1000 houses on Harwell Campus

At Harwell Campus, 1,000 houses are proposed, all in the North Wessex Downs Area of Outstanding Natural Beauty (AONB), most on Campus land, but some on greenfield land.

The Part 1 Inspector was clear that no exceptional need for housing in the AONB had been established, and he saw no evidence supporting a need for housing tied to employment on the site.

Any new evidence making the case for housing needs to be investigated and challenged, together with the location, types and numbers of houses.

See comments above.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above.

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

Not in this response.

Part A: Your Details

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)

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Last Name	<input type="text" value="Collins"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/> (where relevant)
Organisation (where relevant)	<input type="text" value="Campaign to Protect Rural
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Part B – Please use a separate sheet for each representation

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3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Development Policy 15b:
Harwell Campus Comprehensive Development Framework

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 15b:
Harwell Campus Comprehensive Development Framework

The proposed development of 1000 houses on Harwell Campus

At Harwell Campus, 1,000 houses are proposed, all in the North Wessex Downs Area of Outstanding Natural Beauty (AONB), most on Campus land, but some on greenfield land.

The Part 1 Inspector was clear that no exceptional need for housing in the AONB had been established, and he saw no evidence supporting a need for housing tied to employment on the site.

Any new evidence making the case for housing needs to be investigated and challenged, together with the location, types and numbers of houses.

Clarification and justification required.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

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Planning Policy reference – PP:
Chapter Number:

Core Policy 12a:
Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 12a:

Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

The flawed Park and Ride strategy

CPRE believes the remote Park & Ride strategy is fundamentally flawed, as part of a City of Oxford aim to increase employment growth. If Park & Rides must exist, they should from preference be located as close as possible to the areas from where people are travelling. The worst option is to locate them in rural sites between major settlements, which does nothing to reduce the number of car journeys but shifts congestion to rural roads and villages with inadequate supporting infrastructure, as well as impacting on the local landscape.

CPRE further notes that the OCC LTP4 Connecting Oxfordshire Park and Ride Strategy pre-dated the MoD Estates Review which identified Dalton Barracks for disposal. Following the Vale decision to include this site within LPP2 as a “Garden Village” settlement (though further development outside the brownfield area should not be countenanced), it is clearly necessary that the Vale work with OCC to review the strategy, however flawed, on the A34 corridor. Whilst CPRE opposes Green Belt sites for any Park and Rides, co-location of dwellings and sustainable forms of travel is clearly not just desirable but essential. CPRE has sympathy with many local residents who see the Marcham/A34 interchange site as greatly superior to Lodge Hill due to its proximity to the garden village site.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above.

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Not in this response

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The Vale of White Horse District

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Planning Policy reference – PP:
Chapter Number:

Core Policy 16b: Didcot Garden Town

4. Please make your comments on this Planning Policy or Site in the box below:

Core Policy 16b: Didcot Garden Town

CPRE considers that it is very important is to keep continually in mind the intention to have a **'garden town' rather than just a 'new town'**, and the use of varying densities to achieve the best results. With the following considerations taken **strictly** into account and acted upon in timely fashion, there is a real possibility of making appropriate use of a fine opportunity. **Otherwise, the idea should be moth-balled.**

- (i) The full implications for related infrastructure in the whole Vale and South Oxfordshire area, including the availability of complete and committed funding, **be thoroughly investigated**, and in particular for highways including river crossings, etc. - any need for new roads across green fields would need careful placement and justification.
- (ii) The plans for **development be staggered/phased**, with the aim of achieving organic growth and hence a town that will everywhere be one of human dimensions, attractive to live in: the point here being that one section of the town should become established, with a well-defined character, before the next section is built; **'cherry-picking' by developers** as to the order of development and the type of development (in particular as regards avoidance of affordable housing) should be **outlawed**
- (iii) **Design features should everywhere be tested**, both by regular consultation with the community, with 'stakeholders', and with a range of independent planning and design experts with knowledge of successful such developments in Britain **and abroad**; here a main aim should be **to avoid the uniform, mediocre appearance** of so many recent modern developments (eliminating, for example, repeated, similar house-design in the same brickwork, etc.)
- (iv) In particular, we would hope that the **City Fathers include visits to recent developments of garden towns at home and abroad** (Mr Harding refers to Freiburg; I would mention that at the time of the European Games a few years back, Manchester wholly revised its plans, following a visit to Barcelona, which opened their eyes as to what was possible).
- (v) It would be important that as **yet unbuilt strategic sites in the Local Plans are designed to fit well into the plans** for the garden town.
- (vi) Any new development plans should **protect and enhance** existing community green space.
- (vii) **Coalescence** with existing villages, with their own distinctive character, should be **avoided**.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

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Planning Policy reference – PP:
Chapter Number:

Chapter 3:
Additional Policies

4. Please make your comments on this Planning Policy or Site in the box below:

Chapter 3: Additional Policies

The inappropriate deletion of Local Plan 2011 policies, including saved policies

With the removal of so much greenfield land under the Local Plan 2031, it is incumbent on the District Council to give no less a protection to its landscape and to its historic buildings as was given in the Local Plan 2011. In that earlier Plan and the policies saved until now from that Plan, there were a number of policies that gave specific reference to vital protection for specific location and types of landscape and to historic buildings and sites.

CPRE does not accept the contention, in the Appendix to Topic Paper 6, that '*Core Policy 44 in the Part 1 Plan and the emerging Landscape Character Assessment will provide sufficient level of detail*'. Who has made this judgment and on what precisely is it based? Policy 44 and the Assessment quite obviously do not provide the same protections as the 2011 specific policies did.

We here follow the spirit of the draft Local Plan Part 2 – we quote from Page 80, paragraph 3.60:

'The Local Plan 2031: Part 2 sets out additional detailed policies to complement those set out in the Part 1 plan'

and CPRE proposes policies for addition or modification to those in Chapter 3 of the present Part 2 draft.

Landscape

CPRE proposes that Policies NE6-NE12 inclusive and, all consistent with the NPPF and all Saved Policies in Appendix G of Local Plan 2031: Part 1, be added to Section 3.2 'Landscape' of the Part 2 Plan.

Below we give the numbers and texts of the 2011 Policies which contain the precise wording we propose be included as new policies in Chapter 3:

POLICY NE6

DEVELOPMENT IN THE NORTH WESSEX DOWNS AREA OF OUTSTANDING NATURAL BEAUTY WILL ONLY BE PERMITTED IF THE NATURAL BEAUTY OF THE LANDSCAPE WILL BE CONSERVED OR ENHANCED. DEVELOPMENT WHICH WOULD BE VISUALLY PROMINENT, WOULD DETRACT FROM VIEWS FROM PUBLIC VANTAGE POINTS OR WOULD SPOIL THE APPRECIATION OF THE LANDSCAPE QUALITY OF THE NORTH WESSEX DOWNS AREA OF OUTSTANDING NATURAL BEAUTY WILL NOT BE PERMITTED.

MAJOR INDUSTRIAL OR COMMERCIAL DEVELOPMENT WILL NOT BE PERMITTED IN THE AREA OF OUTSTANDING NATURAL BEAUTY UNLESS:

i) IT IS PROVEN TO BE IN THE NATIONAL INTEREST AND NO ALTERNATIVE SITE CAN BE FOUND; AND

ii) ALL STEPS ARE TAKEN TO REDUCE THE IMPACT OF THE DEVELOPMENT ON THE BEAUTY OF THE AREA.

This Policy would clarify Part 1 in line with the NPPF.

POLICY NE7

DEVELOPMENT WHICH WOULD HARM THE PREVAILING CHARACTER AND APPEARANCE OF THE NORTH VALE CORALLIAN RIDGE, AS SHOWN ON THE PROPOSALS MAP, WILL NOT BE PERMITTED UNLESS THERE IS AN OVERRIDING NEED FOR THE DEVELOPMENT AND ALL STEPS WILL BE TAKEN TO MINIMISE THE IMPACT ON THE LANDSCAPE.

The important feature of the Corallian Ridge needs specified protection.

POLICY NE8

THE CONSERVATION OF OXFORD'S LANDSCAPE SETTING WILL TAKE PRIORITY IN CONSIDERING PROPOSALS FOR DEVELOPMENT IN AREAS WITHIN VIEW OF THE CITY. DEVELOPMENT WILL NOT BE PERMITTED IF IT WOULD:

i) HARM THE LANDSCAPE SETTING OF OXFORD; OR

ii) OBSCURE OR DETRACT FROM AN IMPORTANT VIEW OF THE SKY LINE OF COLLEGIATE OXFORD, PARTICULARLY WITHIN THE VIEW CONES AS DEFINED ON THE PROPOSALS MAP.

The 2011 view cones on the proposals map would again need specifying clearly.

POLICY NE9

DEVELOPMENT IN THE LOWLAND VALE WILL NOT BE PERMITTED IF IT WOULD HAVE AN ADVERSE EFFECT ON THE LANDSCAPE, PARTICULARLY ON THE LONG OPEN VIEWS WITHIN OR ACROSS THE AREA.

The 'long open views' are an essential characteristic of the rural Vale and should be specifically protected.

POLICY NE10 (to replace 'the draft 'Development Policy 28)

IN THE URBAN FRINGES AND IMPORTANT OPEN GAPS BETWEEN SETTLEMENTS, AS SHOWN ON THE PROPOSALS MAP, DEVELOPMENT OR CHANGES OF USE WHICH WOULD HARM THEIR ESSENTIALLY OPEN OR RURAL CHARACTER WILL NOT BE PERMITTED.

It is essential that the open gaps between settlements be specified on a proposals map, and that they are protected by a Policy stronger than 'unacceptable narrowing'.

POLICY NE11

PROPOSALS FOR DEVELOPMENT WITHIN OR AFFECTING AREAS OF DAMAGED OR COMPROMISED LANDSCAPE, IN PARTICULAR THOSE AREAS DEFINED FOR LANDSCAPE ENHANCEMENT ON THE PROPOSALS MAP, MUST PROVIDE A LANDSCAPING SCHEME WHICH ENHANCES THE APPEARANCE OF THE AREA. DEVELOPMENT WHICH WOULD FURTHER ERODE OR DAMAGE THE CHARACTER OF THE LANDSCAPE WILL NOT BE PERMITTED.

A proposals map should specify damaged or compromised landscapes where enhancement should be a priority.

POLICY NE12

DEVELOPMENT WITHIN THE COMMUNITY FOREST, AS SHOWN ON THE PROPOSALS MAP, MUST, WHEREVER POSSIBLE, MAKE A POSITIVE CONTRIBUTION TOWARDS THE CREATION OF A DIVERSE WOODLAND ENVIRONMENT APPROPRIATE TO THE LANDSCAPE CHARACTER OF THE AREA. PROPOSALS WHICH WOULD PREJUDICE THE AIMS AND OBJECTIVES OF THE GREAT WESTERN COMMUNITY FOREST WILL NOT BE PERMITTED.

A proposals map should specify protected environments.

See comments above.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above.

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Not in this response.

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3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Development Policy 32:
Open Space

4. Please make your comments on this Planning Policy or Site in the box below:

Development Policy 32: Open Space

CPRE proposes that either this Policy be enhanced, or a new Development Policy be introduced, to support the creation of new accessible natural green space sites within towns, to address deficits in provision.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

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Part B – Please use a separate sheet for each representation

Name or Organisation :

Campaign to Protect Rural England – Oxfordshire Branch

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. We would like to hear your opinions on:

- the policies contained within this Plan
- the additional site allocations
- any recommendations you may have for alternative sites
- any improvements to the Local Plan Part 2 supporting text or policies that you believe will help to improve/strengthen the Local Plan.

If you are commenting on more than one policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Development Policy 36:
Conservation Areas

4. Please make your comments on this Planning Policy or Site in the box below:

Development Policy 36: Conservation Areas

The Historic environment

CPRE considers that the last phrase in the Vale's proposed Part 2 **Development Policy 36, vii, viz:**

'...unless the development would make an equal or greater contribution'

is far too open-ended. The Council should give **very precise circumstances and the test needing to be applied** for such a judgment to be made.

Further, the following should be added, which is a clause in Saved Policy HE1:

IF LEVELS OF TRAFFIC, PARKING, NOISE OR OTHER ENVIRONMENTAL EFFECTS GENERATED BY THE DEVELOPMENT ARE COMPATIBLE WITH THE PRESERVATION OR ENHANCEMENT OF THE ESTABLISHED CHARACTER OR APPEARANCE OF THE CONSERVATION AREA.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above.

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

Not in this response.

Part A: Your Details

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	<input type="text" value="Dr"/>	<input type="text"/>
Last Name	<input type="text" value="Collins"/>	<input type="text"/>
Job Title	<input type="text" value="Chairman, Vale of White Horse Committee"/>	<input type="text"/>
(where relevant)		(where relevant)
Organisation	<input type="text" value="Campaign to Protect Rural England (CPRE) – Oxfordshire Branch"/>	<input type="text"/>
(where relevant)		(where relevant)
Address Line 1	<input type="text" value="Sarsen Cottage"/>	<input type="text"/>
Line 2	<input type="text" value="Letcombe Regis"/>	<input type="text"/>
Line 3	<input type="text" value="Oxon"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="OX129JL"/>	<input type="text"/>
Telephone Number	<input type="text" value="01865 727796"/>	<input type="text"/>
E-mail Address	<input type="text" value="pjcoll@maths.ox.ac.uk"/>	<input type="text"/>
(where relevant)		

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

Part B – Please use a separate sheet for each representation

Name or Organisation :

Campaign to Protect Rural England – Oxfordshire Branch

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3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Development Policy 24:
Noise Pollution

4. Please make your comments on this Planning Policy or Site in the box below:

Development Policy 24: Noise Pollution

CPRE notes and supports the wording of Development Policy 22, Impact of Development on Amenity.

We are aware of increasing concerns about noise coming from external plant, such as air source heat pumps, that can have a particular adverse noise impact on the tranquility of rural areas. It is strongly felt that tone modulation and low frequency noise can bring significant adverse noise impacts detrimental to neighbouring amenity yet are currently underplayed in the current British Standards guidance advice and the Microgeneration Certification Scheme Planning Standards. All of these matters need addressing at the time of the council planning application assessment of the site design and should be capable of being followed up post installation. The limitations of soundproofing measures for external noisy plant in common use should be acknowledged. It cannot be automatically assumed that the poor choice of location of noisy plant can necessarily be overcome by proprietary soundproofing measures or the effect from later substitution of poorer quality noisy plant.

The underlying principle should be based upon little or no significant noise increase above existing background noise at the boundary of the development site, particularly when discharge takes place at ground level. Details of any microgeneration scheme should be accompanied by an Options Report about choice and selection justified. The Planning Authority should accept that adverse noise impact upon neighbouring amenity should be minimised. There can be consequences for the visual appearance of the development itself.

We therefore recommend that noise and vibration should be added to the list of considerations for Development Policy 4 and 6. In addition, the text accompanying all of the Policies should reflect the above-mentioned considerations.

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See comments above.

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

Not in this response.