

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Maggie Brown
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Consultation Point	Core Policy 4: Meeting Our Housing Needs ( <a href="#">View</a> )
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Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

### Meaningful Consultation

The consultation process on the Local Plan has been poor from the start. The first consultation in February 2013 took place without concrete and key information on three major issues: overall numbers, transport strategy for the A420 and the actual sites to be developed in the larger and smaller villages. Had residents in the Vale understood exactly how many houses were to come and the vast percentage of inward migration being proposed, they would have been far keener to respond. This was an opportunity lost.

The second consultation process on the Housing Delivery Update was a sham. No information was posted directly to Vale residents and Parish Clerks were somehow expected to do that job for the Vale officers. This meant many residents in the Vale had no idea that a consultation was even taking place. This was unfortunate as that version of the Plan had adopted a truly huge increase in the numbers of houses to be built (20,560 houses) on the basis of the controversial SHMA report that has since been criticised by the public, organisations such as CPRE and politicians alike. Indeed in an independent critique of the SHMA commissioned by CPRE Oxon, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

Those of us who were aware a consultation was taking place and attended the Shrivenham Public Meeting soon discovered that the presentation by Cllr Murray was a consultation in name only. It was merely a box ticking exercise. Talk (down) to the natives? TICK. An email circulated by the Parish Clerk at Radley confirmed that their public meeting was viewed in exactly the same way.

Vale residents who might have missed out on this second important consultation and who wanted to see what responses had been submitted by others in a consultation that ended on 4 April 2014 were unable to do so because these were not available on-line until November 2014 (by which time another huge tranche of information has been produced as part of the latest public consultation). This is unacceptable and ignores the fact that many people who genuinely want to join the debate to shape the future of the housing provision in the Vale need information in a timely manner. It is very difficult to make sense of the voluminous materials posted on your website generally, and in particular in rural areas with poor broadband connections, as here.

The report to the Council in October 2014 about the consultation process seriously understates the extent and degree of challenges and opposition to the proposals voiced both in the many written comments received and at the public meetings convened to discuss the Housing Delivery Update. Some important points were not properly reported; others were mentioned briefly and then ignored; and the sheer intensity of local opposition was bowdlerised. As a result, we believe Council members may have approved the Plan without an adequate knowledge of the outcome of the consultation.

Under 'New evidence' paragraph 80 of the report states that of the 2,717 responses to the consultation, 'the overwhelming majority [were] opposed to an increased housing requirement and the additional sites put forward.' And yet, when considering 'How did the consultation comments inform the Local Plan?' none of the concerns were specifically addressed. The report to the Scrutiny Committee in September 2014 regarding the responses to the Housing Delivery Update recorded that two petitions were received without even mentioning that another petition, signed by every resident in Shrivenham, had been handed to Cllr Murray when he hosted the Public Meeting. Perhaps he lost it on the way home?

Through the evolution of the Plan, the plan-makers in the VWHDC seem to have been driven by external considerations, and especially by their interpretation of the intentions of Central Government, rather than by a genuine wish to meet the wishes of the Vale community. This disconnection has culminated in a report on consultation to the Council which could be viewed as misleading. **We ask the Inspector to review the report against the consultation responses actually received and to consider whether the Council's decision to approve the Plan may have been made on inadequate information and therefore be invalid.**

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**This raises issues about the sincerity of the consultation, which must be meaningful to be lawful, and the effectiveness of local democracy which must both be aired rigorously at any VWHDC EIP.**

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**Overall Strategy**

The publication of this Local Plan 2031 Part 1, the earlier Housing Delivery Update Feb 2014 and the Local Plan 2029 Part 1 dated February 2013 continue to reinforce the current administration's decision at Cabinet on 9 March 2012 to favour Urban Focus rather than Urban Concentration (which was not favoured in the Preferred Options consultation of 2009 and which you admit included a 'significant minority' suggesting that some growth was appropriate in larger villages?). This is undemocratic. It is not what the residents in the Vale want and Paper 2, Paragraph 5.9 (published in February 2013) acknowledged 'the potential negative effects, ie impact on the natural environment, culture and heritage assets of the Vale and potentially increasing greenhouse emissions'. We question your overall strategy of building more houses in rural areas where people have very little option but to use their cars as public transport and facilities are inadequate, thereby adding to the Vale's well documented traffic problems. This is the least sustainable option and is in breach of NPPF 12 in 'conserving and enhancing the historic environment'.

Despite this, you are unwisely proposing to increase the Vale's housing supply by 40% and you are choosing 21 new development sites for the provision of 13,960 houses; some within the Green Belt and some in the North Wessex Downs Area of Outstanding Natural Beauty. This complete change of emphasis from Urban Concentration to Urban Focus will see strategic allocations of only 1,990 in the Abingdon and Oxford Fringe Sub-Area compared to 1,650 in the mainly rural Western Vale Sub-Area. Abingdon is, after all, the Vale's principal town. It is well located for employment and transport links, has a developed (and recently upgraded) town centre and a number of schools. The same could be said for the other main settlement of Botley which has NO STRATEGIC SITES. Allocating 950 houses to the smallest market town in the Vale, Faringdon, and 500 houses to the village of Shrivenham when only 1000 have been allocated to Abingdon, with none at all in Botley, cannot be sustainable. A Local Plan leading to decisions like that surely cannot represent a sound housing policy for the future of the Vale. This impact is being felt all across the Vale with the decisions you are making in developing these latest 21 sites, 10 of which are within the open countryside and have little or no prospect of employment and facilities able to support such growth. You admitted in the Housing Delivery Update that these sites are 'smaller and more readily deliverable sites'. In essence, they are the kind of sites that developers could only have dreamed of being offered back in 2009 when the far more balanced Preferred Options consultation took place.

**I believe you will have a difficult job to persuade the Inspector at the EIP that you have taken the views of the vast majority of Vale residents into account at any time since February 2013.**

### **Strategic Housing Market Assessment**

The SHMA report proposes building 20,560 houses in the Vale to 2031 representing an increase of 7,430 from the Local Plan published in 2013. Demographic trends show that the Vale needs less than 500 houses per year and yet we are being asked to find room for 1028, with increased housing being proposed in the first 5 years. The District Council needs to be honest about where they think this enormous net migration into the Vale is coming from? If asked, most villages would not be in favour of this level of growth which will turn them into urban style dormitories for commuters to Swindon/Oxford/Harwell (and beyond) which will add still further to the Vale's traffic problems.

We do not believe that there is any published evidence that such targets could be achieved in a sustainable way, without damaging our local environment and overwhelming our infrastructure? We believe these figures are unwanted, unsound and unachievable. We believe you have a duty to supply and publish the evidence that the Vale has undertaken a proper analysis instead of just accepting these figures blindly as appears to be the case.

The risk of serious harm from over-allocation of house growth is very great. Builders' preferences for Greenfield land will lead to a more dispersed pattern of development, will put unnecessary and inappropriate pressure on rural Oxfordshire and will fail to encourage appropriate urban investment and regeneration. This will be damaging to Oxfordshire as an attractive business location and as a place to live. In particular, the damage to the countryside will be irreversible.

In adopting the SHMA figures so readily, the Vale of the White Horse District Council has cut out a crucially important stage in the process, identified in para 1.12 of the Oxfordshire SHMA Key Findings document itself, of testing whether the assessed housing need can be accommodated, and to identify where housing should go, and to plan for the supporting infrastructure investment which will be needed to ensure that growth is sustainable.

This has led to our MP, Ed Vaizey questioning the then Housing Minister, Nick Boles, about his concern that the standard national methodology that has led to these numbers is over-estimating the actual demand locally and that there are significant consequences for many local communities which are now faced with levels of growth that will fundamentally change the nature of settlements. He called for an urgent review of the planning methodology that leads to such massive numbers of homes being planned so that more realistic outcomes result. He went on to point out that as so much of the land in the Vale is nationally protected land such as Green Belt, AONB and areas of Thames and Ock flood plains, surely a case could be made for reducing the population projections. This, along with the concerns of thousands of Vale residents, has fallen on deaf ears as the latest iteration of the Local Plan confirms.

This week we learn that the Communities and Local Government Committee have announced in their report that *the Government must strengthen the planning framework to tackle emerging concerns about inappropriate and unsustainable development. The same weight needs to be given to environmental and social factors as to the economic dimension to ensure the planning system delivers the sustainable development promised by the NPPF*. It is therefore possible that NPPF and related government policies may change.

Alas, the Vale's Local Plan is **proposing** inappropriate and unsustainable development and is paying scant regard to environmental and social factors.

It is essential that evidence such as SHMAs must be rigorously tested in order to establish that it is robust. This further work should not have been by-passed. It would have been an opportunity to challenge the overall level of housing provision which needs to be planned for. It would also have provided an opportunity to take account of environmental constraints and issues related to transport, school places, health provision and other necessary local infrastructure in considering how much development can be sustainably accommodated. The VWHDC has in our view failed in its responsibility to the communities it represents by failing to allow for these factors in adopting the SHMA numbers without modification, and by precipitating land grabs for development on Greenfield sites throughout the District.

**We therefore find Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 7, 8, 13, 15, 20 and 44 unsound. There can be no presumption of sustainable development based on the exceptionally high projections of housing need proposed in the Oxfordshire SHMA, which is itself unsound and unsustainable and should not be relied upon. We wish to be associated with all of the arguments put forward in CPRE's submission regarding the unsustainability and unsoundness of the Oxfordshire SHMA.**

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant 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.**

**Conclusion**

The overall strategy needs considerable readjustment. It is significantly in breach of the requirements of the NPPF. It does not protect the environment, does not build healthy and sustainable communities, does not support sustainable transport and accessibility, and does not support economic prosperity (apart for those developments adjacent to 'Science Vale?'). The Vale needs to return to a strategy more in keeping with the two previous Local Plans which concluded that locating most of the new development in the settlements of Abingdon, Botley, Faringdon, Grove and Wantage and limiting it elsewhere was the most sustainable strategy. 'Focussing development in these locations, rather than spreading it more widely, would reduce the need to travel, enhance the vitality of the towns and protect the rural character of the Vale.' None of the above has changed. Indeed the Oxfordshire Structure Plan to 2016 included a requirement for the larger urban areas to be the main focus for development.

If you cannot accommodate sufficient growth in the main settlements in the Vale with far more modest growth in the larger villages, you will need to re-visit the Garden City idea (which you have effectively pushed to one side by safeguarding the land for the reservoir) for the mid to later part of the Plan period. Indeed, if you do not adjust your housing growth figures, you will be obliged to do so as this area is close to the employment at Science Vale and is one of only two viable options. The alternative, bearing in mind the Vale is taking a disproportionately higher number of houses when compared with neighbouring councils in Oxfordshire, would be to ask them to share in some of the housing growth as they will reap the benefits of the employment opportunities. South Oxon's Western border runs almost alongside the Science Vale area. It is worth mentioning that their demographic housing growth is higher than that in the Vale and they had a far worse track record in their 5 year housing land supply and yet they are being asked to provide far less housing. We share all of our services these days so surely it makes sense to share some of the planning pain in return for the economic gain. The Plan makes mention of exploring a southern bypass of Abingdon with South Oxfordshire District Council. NOW is the time to include this in the Plan in order to plan for proportionate strategic growth in the Vale's principal settlement this side of 2031 and prevent building on the Green Belt north of Abingdon which is so controversial.

The most urgent item of business however is for the VWHDC to assess the numbers in the SHMA report in regard to 'environmental constraints or issues related to congestion and local infrastructure' which are 'very relevant issues in considering how much development can be sustainably accommodated and where new development should be located' (Government guidance quoted at Paragraph 4.11 on Pg 25 of the SHMA report.) Failure to do so will put you in breach of your statutory obligations. Your current draft Local Plan pays no regard to the interests of existing communities in the Vale or of its natural and historic heritage and will have disastrous consequences for the rural character of the Vale.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification,** Yes - I wish to participate at the oral examination  
**do you consider it necessary to participate at the oral part of the examination?**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

As a parish we fully endorse the representation submitted by the WVV today and wish the Hindhaugh Report, attached as Appendix 1, to form part of the evidence to the EIP. Bourton Parish Council, either as a member of the WVV Consortium, or as an individual parish wishes to be represented at the Examination in Public. We also wish to be notified of submission of the Plan to the Secretary of State, any recommendation resulting from independent examination and whether the Plan is adopted.