

Vale of White Horse District Council

17 December 2014

By e-mail to: planning.policy@whitehorsedc.gov.uk

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Vale Local Plan

Response to Consultation on draft Local Plan Part One 2031

From: Mr Simon JM Jenkins
South Paddock House
Uffington
Faringdon SN7 7RE

E-mail address: [REDACTED]

Objection to the draft Local Plan Part One 2031

Introduction

It must clearly be noted that these representations are made during a period in which the draft local plan of Swindon Borough Council has been reviewed at EIP but that the Inspector's final ruling, expected in early 2015, has yet to be made public. The Cherwell DC EIP is currently on-going. The EsIP of (so far not yet public) draft local plans of Oxford City Council, West Oxfordshire DC and South Oxfordshire DC have yet to take place and may not be decided for many months yet. In addition, discussions about a strategic plan for the A420 - but with terms of reference as yet unknown - are due to begin between OxCC and SBC on 20th December 2014 with, self-evidently, an unknown outcome. These talks are to be led by VWHDC. What is known, anecdotally at least, is that SBC has secured the "promise" of substantial funding of some £48m for improvements to its end of the A420 including a rapid transit system, the proposed Southern link to the Commonhead interchange, the reconstruction of the White Hart interchange in Swindon, and some smaller works.

What is also known, again anecdotally but reliably, is that unmet housing need in Oxford City, amounting to some thousands of houses over its allocation of some 20,000 homes, may under the duty of cooperation, have to be allocated to Oxfordshire district councils with, inevitably therefore, further pressure on rural areas and the A420 and other non-trunk and trunk highways.

Evidence about these matters, fit for submission to any VWHDC EIP will emerge therefore only after the date for representations is well past.

The same applies to the commitment by Oxfordshire County Council to produce a Route Strategy for the A420 as part of its development of its new Local Transport Plan. I understand that this will not be finalised until the Spring of 2015. There is therefore an obvious disconnect in that the urgently required modifications and improvements to the A420 will not be addressed until after the consultation on the Vale Local Plan closes. I do not believe that the housing allocations can be considered sustainable without an understanding of the infrastructure proposals in the Transport Plan.

This confusing kaleidoscope of evidence and timings is not in the public interest. Furthermore, the public interest is ill-served by the poor high speed Broadband delivery in the Western villages of Oxfordshire - as can be seen on the OxCC website - resulting in difficulty for villagers and their Parish Councils to read documents essential to a full understanding of the draft local plan.

I wish to object to the draft Local Plan Part One 2031 on the basis that it is 'unsound'. Below I outline my reasons, and what must be done, if the Vale of the White Horse, and indeed Oxfordshire as a whole, is not to lose its character and identity.

Re: Core Policy 4 & all others that flow from it, in particular, Core Policies 8, 13, 15 & 20:

1. **The SHMA is unsound and unsustainable and should not be relied upon.** The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

From these criticisms I understand that:

- The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;
- The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and
- Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and house building rates and it has not been subject to public consultation or independent scrutiny.

I am not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

2. **The Vale District Council has failed to give proper consideration to the environmental and social constraints within the District:**

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. As far as I understand, the Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

Re: Core Policy 13 Oxford Green Belt, Core Policy 8 – Spatial Strategy for Abingdon & Oxford fringe Sub Area & Core Policy 15 – Spatial Strategy for SE Vale Sub Area:

3. **The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB).** The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale.

A further 11 sites are proposed for removal from the Green Belt. I am concerned that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

Green Belt

The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green Belt boundary may be altered only in 'exceptional circumstances'.

Moreover, recent guidance (6 March 2014) states that: 'Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute

the “very special circumstances” justifying inappropriate development on a site within the Green Belt.’

The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim remains to prevent urban sprawl by keeping land permanently open. Boundaries of Green Belts should only be changed in “*exceptional circumstances*”, and unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt.
North Wessex Downs AONB.

Under the *Countryside and Rights of Way Act 2000* the Council has a statutory duty to have regard for the purposes for which the North Wessex Downs were designated an AONB; that is to conserve and enhance the natural beauty of the landscape.

The NPPF places AONBs in the highest category of landscape protection and affords them “great weight” in the decision-making process. Further to this the NPPF confirms that AONBs are one location where restrictions apply to development and accordingly that: ‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.’

Re: Core Policy 7 – Providing Supporting Infrastructure:

4. **There is a lack of appropriate infrastructure to support the Plan as outlined.** I cannot see how public services and infrastructure, such as the road network, which are already over-stretched in many places, can possibly be improved within the timescales to meet such a great increase in demand. I do not believe that the District will be able to cope with this level of growth and I am very concerned about the impact it will have on the environment and the countryside. I therefore believe the Plan as it currently stands to be *ineffective* and *unsound*.

Re: Core Policy 4:

5. **The consultation process has been poor.** The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and at the public meetings convened to discuss the plan. I therefore believe the Plan has *not been positively prepared*.

Re: Core Policy 20: Western Vale Sub-Area strategy

As a resident of Uffington, I am particularly concerned about the impacts of the Plan on the already seriously congested A420. The Plan proposes 1,650 homes in the Western Vale, of which 1,450 would be adjacent to Shrivenham and Faringdon, close to the A420, with a further 656 homes to be allocated in Part 2 of the Local Plan. This is in addition to the 8,000 houses allocated in the Swindon Borough Local Plan 2026 Submission Document, June 2013, as part of a mixed use development to the east of the A419 and north and south of the A420, known as the Eastern Villages. In its Evaluation of Transport Impacts Stage 2 and 3a Report, the Vale rightly identified that the proposed strategic sites are likely to lead to some impacts on the A420, particularly around Faringdon.

The plan makes no realistic attempt to provide for employment growth in the immediate area to counter the inevitable commuting that will result. It seems to rely almost entirely on existing available employment land at Faringdon which has been available for over 10 years without any interest from either developers or occupiers despite various initiatives from Government and Local Bodies to stimulate development.

From a market perspective this is not surprising as Faringdon is not and never has been a viable commercial centre as envisaged and simply building large quantities of new housing will not change this. There is no employment expansion potential at Shrivenham and with considerably more prime opportunities emerging only a few miles away in Swindon and to the east with the Science Vale growth initiative, it is inevitable that businesses will prefer to locate in these areas, particularly when the main arterial route serving Faringdon and Shrivenham, the A420, is so notoriously congested.

The plan proposals are therefore simply not sustainable without a clear and unequivocal commitment, as a precondition to development, to the essential upgrading of the A420 (as well as the other main routes through the Vale- A34/A417/A338) as outlined in the document attached prepared by Hindhaugh Associates entitled Necessary Infrastructure Requirements ON A419/A420/A415 LINK (12 December 2014). Also needed is the recognition of, and a plan to deter, the potential for “ratrunning” through the Vale villages with the environmental damage and other adverse consequences that will result.

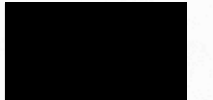
I would refer you to the Statement of Common Ground entered into jointly in April 2014 by the consortium of Western Vale Villages with Swindon Borough Council, the Vale District Council, and Oxfordshire County Council. This statement sets out the common ground between the parties with regard to the Swindon Borough Local Plan and outlines all the Councils’ commitments to upgrading and improving road capacity on the A420. I understand that until very recently no meaningful attempt has been made by any of the authorities to address the recommendations and conclusions of the SOCG.

I feel very strongly that essential improvements to the A420 should be a precondition to any housing development in the Western Vale.

I would like to remind you that the Communities and Local Government Select Committee has recently stated in a report that the Government’s planning policy, the National Planning Policy Framework (NPPF), needs to do more to protect against unsustainable development in England and ensure communities are not subject to unwanted housing development. They say that councils must do more to protect their communities against the threat of undesirable development by moving quickly to get an adopted Local Plan in place. The NPPF is designed to work side by side with local plans.

For the above reasons, I consider the Plan to be unsound because it is not justified by robust evidence. Consequently, I request that much lower housing figures (based more closely on the Government’s own household projections) should be used by the Vale in its Local Plan, and that the Inspector strikes from the Local Plan all site allocations in the Green Belt and North Wessex Downs.

Signed:

A black rectangular box redacting the signature of SJM Jenkins.

SJM Jenkins

Encl: Hindhaugh Associates Necessary Infrastructure Requirements ON A419/A420/A415 LINK (12 December 2014)