

Vale Local Plan

Response to Consultation on draft Local Plan Part One 2031

From:

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Objection to the draft Local Plan Part One 2031

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.

In addition, I have specific concerns relating to the proposals for North Abingdon, particularly those on green belt farmland next to 12 Acre Drive.

Since I moved to Peachcroft Estate in 1991, into a house that backs onto 12 Acre Drive at a point adjacent to the stream and culvert, this road has become much busier. It has now reached the point where my wife and I rarely make use of our back garden due to the noise. The addition of hundreds of new properties will only serve to make this worse and have a serious impact on our quality of life, and that of the many residents of other properties backing onto 12 Acre Drive, due to traffic noise and fumes.

Additionally, I have a major concern about the increased risk of flooding due to building on open fields. The bottom corner of the field nearest to the culvert has often flooded at times of very wet weather as the land is unable to soak up the surface water fast enough as it runs down from higher ground and it builds up in the bottom corner of the field before the stream can carry it away. In early 2008 this resulted in 12 Acre Drive being flooded and the road closed for a time. During this time my garden became flooded with water draining off the road but unable to find its way into the stream due to the raised pavement and cycle path that had been built in 12 Acre Drive some years earlier (years after we had moved in). The only reason my house did not flood was that the fire brigade contacted the farmer who brought over a JCB from the farm and dug a trench across the bridleway which quickly diverted the water away from both the road and my property and into the stream.

I am extremely concerned that the proposals will significantly increase the risk of such flooding happening again, possibly with a more serious outcome for my property and those of my neighbours, if the stream and culvert are unable to cope with faster and greater runoff due to parts of the fields being built on. I would be grateful for a response from you that lays out what flood-alleviation measures would be put in place to ensure such flooding does not happen if the planned development goes ahead.

Finally, I also have concerns that the local infrastructure, such as doctors and schools, will be unable to cope. I admit to being sceptical that infrastructure improvements will happen fast enough to keep up with the large increase in the local population.

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 housebuilding rates and it has not been subject to public consultation or independent scrutiny.

However, 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*.

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

Yours faithfully

Sean Mannall