

From: SPADE (Sunningwell Parishioners Against Damage to the Environment)

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SPADE is respected local group which was originally set up by local parishioners in Sunningwell in response to the Oxfordshire Structure plan process. It has, since then, campaigned on behalf of people in the Sunningwell parish on matters affecting the local environment, principally large-scale planning process and issues. It provides a voice for local people in Sunningwell, a small parish in the Oxford Green Belt outside Abingdon.

SPADE wishes to support some elements of the draft Local Plan Part One 2031 but object to others on the basis that it is 'unsound'. Below we outline our 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 and the nature and permanence of the Green Belt is to be protected.

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 We 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, we are 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 We 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:

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. We are 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 – it is not appropriate for authorities to nibble away at the Green Belt except where the exceptional circumstances are demonstrated. 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. We note there is no proposal by the Vale to add new compensatory land into the Green Belt and that more land from the Green Belt will be required for the proposed Diamond Junction at Lodge Hill on the A34.

SPADE supports the removal of the Green Belt sites in Wootton from the proposed plan but objects to the inclusion of other Green Belt sites as sites for significant development and the removal of some areas from the Green Belt entirely on the basis that there has been no demonstration of the exceptional circumstances which would permit such actions.

We wish to object that Vale's Green Belt Review was carried out without consultation.

Re: Core Policy 7 – Providing Supporting Infrastructure:

SPADE strongly supports the view that development must be infrastructure-led. It is difficult to see how public services and infrastructure, such as the road network, which are already overstretched in many places can possibly be improved within the

timescales to meet the great increase in demand for development. We are very concerned about the impact it will have on the environment and the countryside. We therefore believe the Plan as it currently stands to be ineffective and unsound.

Re: Core Policy 4:

The public 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. The public meetings were inadequate both in their ability to provide space for all those who wished to take part, and in the level of questioning they were prepared and willing to be able to answer.

For the above reasons, we consider the Plan to be unsound because it is not justified by robust evidence. Consequently, we 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 (and site removals from) the Green Belt.

Robert Warne
Chair, SPADE