

Vale of White Horse Local Plan Part 2 Examination

Submission by **Tim Dougall** in support of my previous representation **ID 1097660**

As per my original representation, I wish to apply to attend and speak at the Examination Hearing concerning the proposal for development in Fyfield & Tubney Parish (incorrectly identified by VOWH DC as 'Kingston Bagpuize with Southmoor') proposed for the **afternoon session of Tuesday 24th July 2018**.

In furtherance of my original representations, I would add the following comments in response to the Inspector's List of Matters and Questions. All are pertinent to Matter 1 but have specific relevance for Matter 4, Question 4.1c (Fyfield & Tubney proposal).

Matter 1: Duty to Co-operate and other legal requirements

Question 1.6: *Has the preparation of the LPP2 complied with the Statement of Community Involvement*

VOWH Statement of Community Involvement Part 2, p.4 states 'We want our plan-making to fully consider [sic] and take account of community views'. As previous submissions have made abundantly clear, establishing procedures for consultation is not the same as fully taking into account community views. I would challenge VOWH DC to provide *any* evidence that LPP2 development proposals for the Parish of Fyfield & Tubney show consideration for the views of the community that actually live here. The evidence of submissions is to the contrary, namely:

- The failure of VOWH DC even to identify correctly the parish upon which it was proposing to impose a quadrupling in the number of properties during its initial planning.
- The inability of VOWH Planning Policy Project Lead, Andrew Maxted, to provide any evidence of the benefits of the proposed development in Fyfield & Tubney for the community: 'to be honest, this isn't for Fyfield' being his response.
- The abject failure of VOWH DC to take fully into account a petition of objections from the entire community to be affected by its proposals for Fyfield & Tubney. Indeed, the scale of the housing development under consideration has *increased* since receipt of this petition, not without the connivance of VOWH DC.
- The contempt shown for the views of the community are instanced severally in my earlier submissions: failure by the former Head of VOWH DC to respond to concerns about broken pledges *not* to sanction further large scale developments in the locality of Kingston Bagpuize following its doubling in size as a result of LPP1 decisions; failure by VOWH DC to respond to public concerns over the role of a company founded and run by an Oxfordshire District Councillor in promoting the proposed Fyfield & Tubney development;

public denial by VOWH Head of Planning that G L Hearn, the company appointed by both VOWH and Oxford City Council to conduct their SHMA (the city's assessment now widely called into question and still to result in a Local Plan), was involved in property development. This was clearly a misrepresentation of the truth, as at a subsequent public meeting the current Head of VOWH DC was unable to offer guarantees that neither G L Hearn nor any other constituent of Capita Real Estate & Infrastructure would benefit financially as a result of development arising from their 'independent assessments' of housing need for the Vale of White Horse.

Question 1.8: *Have the likely environmental, social and economic effects of the LPP2 been adequately addressed in the Sustainability Appraisal?*

In the case of Fyfield and Tubney Parish, whatever the potential merits of the VOWH Sustainability Appraisal *per se*, as its stated objectives have been entirely ignored, it ceases to have any validity. Amongst the failings addressed in my earlier submissions are:

Sustainability Objective 1: provision of sufficient suitable homes, including affordable homes

This development has nothing to do with addressing housing need (as opposed to desire) and everything to do with further enriching the landlords, estate agents and property developers responsible for the inflation in county-wide rental and property costs in the first place. These are **unsuitable** homes in an **unsuitable**, green field location and a historic rural parish setting, with no access to local jobs, services or decent transport links. Indeed, as the VOWH Planning Policy Project Lead has made clear, had not the landowner in this instance lobbied unremittingly for inclusion of the site it would not have been identified for consideration by Council planners. Shortage of large-scale development sites as required by LPP2 is not a reason to satisfy a landowner's financial requirements – an unsuitable site is an unsuitable site. The concept of 'sufficient' homes is dealt with severally in my submissions. LPP2's forecast of a minimum 42% increase in the population of the Vale during the course of the plan – a rate ten times higher than a national average forecast itself declining by the year smacks of superfluity rather than sufficiency, and is based on flawed economic sustainability objectives (see point 6). As to affordability, the Council is at pains to point out that it has no control over who buys homes on the open market and statistical evidence from the neighbouring parish of Kingston Bagpuize with Southmoor, which has doubled in size due to new developments over the past six years, shows clearly that a) average house prices continue to rise substantially; b) the number of houses bought to let has increased, along with the rents charged; c) the estate developments undertaken in a rural community have proved entirely unsuitable in promoting a sense of community (see point 5).

Sustainability Objective 2: ensure the availability of high-quality services and facilities in rural areas

These are neither sought by this rural community (viz the scale and unanimity of parish objections) nor provided for by the LPP2 proposals for Fyfield & Tubney. As VOWH DC fails to appreciate, turning this parish into a town is not providing for the needs of a rural area, as made clear in my submissions.

Sustainability Objective 3: reduce the need to travel . . . and reduce road congestion.

I draw the attention of the Inspector to the numerous transport surveys and submissions made on this subject and await with interest the explanations of the VOWH, Savills and Lioncourt Strategic Land as to how the construction of a minimum of 600 new homes, shops, school, bypass, roundabouts and lorry lay-by within the parish will *reduce* the need to travel and *reduce* road congestion here. Indeed, the entire LPP2 proposal to grow the population of the Vale by in excess of 40% is clearly at odds with this objective.

Sustainability Objective 4: improve the health and well-being of Vale residents

The residents of Fyfield and Tubney Parish still await a response from VOWH DC as to exactly how the quadrupling in size of our community and the replacement of 85 acres of green space with 'green infrastructure' is intended to *improve* our health and well-being (see for instance point 9 on reduction of air, noise and light pollution).

Sustainability Objective 5: reduce inequality, poverty and social exclusion

As the evidence of my earlier submission and neighbouring Kingston Bagpuize has made clear, the building of vast housing estates within rural communities, chiefly comprising residents commuting long distances to escape even higher property prices in London or Oxford, or complexes of retirement accommodation, has nothing to do with fostering social cohesion or equality. Indeed, the scale of homogeneous designs, their proximity and the necessary screening of such sites only emphasizes the driving economy of scale imperatives of the developers and the isolation of the communities they foster. VOWH DC can offer no guarantees that a single homeless person or family currently in temporary accommodation will be housed in the development proposed for Fyfield and Tubney upon completion, let alone a year after. Latest government statistics for house prices in VOWH show that despite a 16% increase in national new build completions in 2017, house prices for early 2018 continued to rise at an annual rate 38% higher than wage growth. Leaving market forces to address the problems raised in Sustainability Objective 5 by some form of trickle-down effect, by all objective observations, clearly does not work – largely because property developers do not make money out of pursuing SO 5.

Sustainability Objective 6: support a strong and sustainable economy

As made abundantly clear in my previous submission, VOWH DC's faith in future rates of economic growth exponentially higher than those forecast by the Bank of England and other notable financial analysts is entirely misplaced. The wholly detrimental influence of Oxfordshire's malignant Growth Board, of which the former Head of VOWH was a prominent member, is apparent in their aspirations. The clapped-out mantra of 'growth and

jobs’ as a panacea for the District’s needs is, by the current Head of VOWH DC’s own admission, far more to do with central government’s sense of panic over the impending impact of Brexit than any sense of sustainable improvement or community regard. The so-called ‘knowledge spine’ beloved of both Growth Board and Council, in its pursuit of technology innovations from fusion energy, to ultra-speed communications, transport, robotics and AI, posits *less* need for future labour not more, and such demand as there may be for highly specialized skills in the interim will come from the likes of distant Culham, Grove, Didcot and Harwell and not from Fyfield. As to ‘sustainable’ economic policies, I would recommend that those proposing the Fyfield & Tubney site for development read Kate Raworth’s ‘Doughnut Economics’ prior to the Examination Hearing, as it may well cause them to reconsider the failings of their current growth strategy.

Sustainability Objective 7: improve and protect the natural environment

Again, I would suggest that the destruction of 85 acres of current countryside, hedges, trees and wildlife habitat envisaged in the LPP2 proposal for Fyfield and Tubney Parish cannot, in any sense of the words used by VOWH DC, help to ‘improve’ or ‘protect the natural environment’. Whether the environmental reports initiated by the Council and developers record the presence of so-called ‘significant’ species of flora and fauna is neither here nor there – they plan to do exactly the opposite of their stated objective in destroying the natural environment. Will bats, Barn Owls, hedgehogs, deer, nightingales and the host of other species, trees and plants currently on those acres find their existence ‘improved’ by a vast housing estate? Given the scale of species degradation globally, such species remain ‘significant’ to us as well as to themselves, at risk of being surrendered to an at best dubious and at worst specious economic growth plan. No number of palliative ‘wildlife zones’ can make up for the destruction of habitat adapted to farming since prehistoric times. It is an outrage that in a nation with the oldest footprint of brownfield sites on the planet the simple development solution of further inroads into our shrinking natural environment remains a prime option for Council planners.

Sustainability Objective 8: protect the cultural heritage and provide a high-quality townscape and landscape

At the hearing I hope to find an answer to my earlier query as to how the construction of a 600 property housing estate in a historic parish that has accumulated a third of that number of houses since Domesday Book can be seen to be protecting the cultural heritage of the community or providing a high-quality landscape. VOWH appear to confuse ‘landscape’ with ‘landscaping’ in the case of Fyfield and Tubney – we are to be deprived of one so that the other can attempt to conceal the consequences of that deprivation. As to ‘cultural heritage’, my online definition has ‘the legacy of physical artifacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and preserved for the benefit of future generations’. I, and the entirety of the population of this parish, remain to be convinced as to how the Council’s proposals for development of Fyfield and Tubney are consistent with this stated objective.

Sustainability Objective 9: reduce air, noise and light pollution

Will there be *less* air, noise and light pollution from the 600 property housing estate, shops, filling station, new roads, roundabouts and truck stop envisaged in the VOWH proposal for Fyfield and Tubney than issues forth from the current 85 acres of arable farmland *in situ*? As a sustainability claim I admit it to be a bold one, but science and historical precedent are not on the side of the developers here.

Sustainability Objective 10: reduce greenhouse gas emissions and the use of resources

Again, I am no expert in the field but I remain to be convinced that the construction of 22,500 new dwellings and all the associated infrastructure as envisaged in LPP2 for the Vale of White Horse is likely to *reduce* greenhouse gases or utilization of resources from the District. Whilst each of us who is a current resident has an individual duty to reduce our environmental footprint, the net result of such a vast expansion of population, industry and infrastructure as proposed in LPP2 cannot avoid the *opposite* effect upon the environment – such is the environmentally incompatible and unsound vision of economic growth put forward by VOWH DC and Oxfordshire Growth Board (see point 6). Attempts to minimize the damage done to the atmosphere and depletion of resources in the name of growth is not the same as *reducing* that damage – the government’s 2016 pledge to reach a zero carbon emissions state has yet to be enshrined in law but a date of 2050 has been discussed. Reversing the rise of global temperatures is even further in the distance and there is some irony that Culham’s pioneering work on fusion energy should be championed by a plan so evidently hostile to the environment in its methods.

Sustainability Objective 11: increase resilience to climate change and flooding

In the case of Fyfield & Tubney, the destruction of 85 acres of farmland and its replacement by a built environment is unlikely to assist in the fight against climate change or flooding. Run-off may (hopefully) be channeled, stringent environmental building standards be adhered to and carbon emissions may be monitored, but it does not require a UN report to confirm that economic development into green spaces is the greatest cause of climate change, which in its turn is the greatest threat to that selfsame economic growth. VOWH DC LPP2 shows no fundamental awareness of such concerns and its ‘build it and they will come’, ‘all growth is good growth’ attitude hardly befits such an organization. The current and future needs of the rate payers and environment of the Vale are set aside for some putative future residents and businesses, with mere lip service being paid to local democracy and heritage. This District deserves so much better.

As per my earlier submissions, it can be shown that the fundamental Sustainability Objectives upon which VOWH DC’s LPP2, and particularly its plan for Fyfield & Tubney rest and are tested, are flawed to the point of being unsustainable by any objective measure. It could be argued that my reading of these objectives has been too literal – that the words employed such as ‘improve and protect’, ‘reduce’ or ‘increase’ were not to be taken as read; that by ‘*improve*’ the natural environment or ‘*protect*’ the cultural heritage what VOWH actually meant was ‘try to limit the damage’; that by ‘*reduce*’ the need to travel and road congestion they actually meant ‘aim to mitigate the impact of quadrupling the parish’s population in one go’? But these are the words selected for the Sustainability Appraisal as commissioned and upheld by VOWH themselves, not by me. If these words are not intended to be interpreted as they are stated then which other parts of the LPP2 process must also be ‘reinterpreted’, one is led to wonder? By such criteria, the Plan, especially as it relates to the proposal for Fyfield &

Tubney Parish (Your Matter 4, Question 4.1 c) is **unsound** and should be rejected at inspection.