



Watchfield Parish Council

Planning Policy Team,
Vale of White Horse District Council,
Abbey House,
Abbey Close,
Abingdon,
OX14 3JE

December 13th 2014,

Dear Sir or Madam,

Watchfield Parish Council would like to make the following comments regarding the Vale of White Horse District Council Local Plan:-

Re: Core Policy 1 and all others that flow from it, in particular, Core Policies 4, 7, 8, 13, 15, 20 and 44

- **Housing numbers and SHMA** - these are being heavily influenced by economic plans for the county, which are produced by the Local Enterprise Partnership, a non-elected body and chaired by the Public Sector. To date, there has been no open public consultation on these plans or independent scrutiny and there is an assumption that created jobs will be taken by residents of the Vale whereas, in reality, they will probably result in more people being drawn from outside the Vale causing an exacerbation of housing need and environmental impact of commuting. Where is the evidence that building targets are satisfying a demand rather than creating one? The Local Plan states that the SHMA has been produced with other Oxfordshire authorities but there is no reference to the proportion of Oxfordshire-wide housing requirement allocated to the Vale in comparison to, say, South Oxfordshire. The duty to co-operate is not a duty to accept. The 40% increase in the housing numbers to be built up to 2031 will be disastrous for the rural nature of the Vale and heritage sites. The Local Plan is based on exceptionally high forecasts of need from the controversial SHMA, which has been much criticised by the public, organisations (such as CPRE) and politicians. 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. The implications of the SHMA have not been balanced against the environmental and social aims as set out in the NPPF. The recent Select Committee Report into the Operation of the NPPF stressed that all strands must be equally sustainable in order for development to be allowed. There is, also, no reference to a Windfall Policy or any maximum numbers attached to windfall sites. Without a clear policy, and whilst the Vale continues to fail to address the 5 year land supply shortage, windfall sites could attract developments

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Chairman

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greater than those allocated as strategic sites making *planned development* unachievable.

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing numbers and that further work should be done to test whether such numbers can be accommodated sustainably before adopting it as a housing target. The Vale of White Horse District Council did not attempt any further work to verify these figures and adopted the SHMA unquestioningly. They should have first robustly assessed them against social, environmental and infrastructure considerations. The Local Plan, therefore, cannot be considered to be effective or sound.

- **Concentration of housing numbers** - as the Vale is concentrating their employment opportunities in a few locations it would make more environmental and economic sense to concentrate the housing in those areas far more than is being done in this version. This would lessen the impact on wider infrastructure and reduce environmental pollution through commuting. The spread of housing does not correlate with the District Wide Policy of 'protecting the environment and responding to climate change'. There should be a more robust link between employment and housing.
- **Housing density** - the possibility of higher density housing in urban locations has not been fully explored. Small blocks of flats would provide some of the 1-2 bed housing requirements with less impact on land use. This would not be appropriate in rural locations. The possibility of 'garden cities' has also not been publically discussed. Surely large scale developments in appropriate locations with all associated facilities, employment and infrastructure built in from the start would cost less in the long run than 'bolt-on' developments in multiple sites and the concomitant problem of updating facilities and infrastructure in many locations?
- **Character of villages** -the Local Plan states that the special character of villages (Shrivenham and Watchfield) should be conserved or enhanced. The Plan does not contain any policies for how this is to be achieved or the criteria used for maintenance character. There must be a policy included to eliminate coalescence of villages. Watchfield and Shrivenham are mentioned in the same breath, yet they are two separate villages, currently divided by the golf course. Where are the policies for preserving this buffer and retention of green space between villages? A complete absence of a policy for

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proportional development of villages shows that the character is unimportant to the Vale. A huge increase in the size of a village will immediately detrimentally impact on the character. Equally, the absence of the link of housing to employment will mean new village residents will inevitably have a lengthy commute to work destroying the community aspect of villages.

- **Design** - all the proposed developments will be 'high quality' according to the Local Plan. There is no indication how the Vale proposes to enforce this. This cannot be a subjective decision by each planning officer. There are no commitments to ensuring the houses are built to the highest sustainability standards and the opportunity has not been taken to insist on green technology options as standard. The Vale could be leading the way regarding the reduction of the environmental impact of new housing rather than trying to win the race to the bottom. There are no targets or specific provision for housing for the elderly, e.g. bungalows. If the government and Vale are serious about older people retaining the ability to live independent lives in their own homes for longer, provision has to be statutory. The statement in the Local Plan that the 'high quality and rich heritage of the Vale's villages and towns contributes significantly to its attractiveness as a place to live and invest in. It is important these qualities and characteristics are protected' is not backed up by any definite proposals for how this is to be achieved.
- **Environment** - blind acceptance of SHMA figures has ignored the preservation of the environment and led to inappropriate allocation sites within the Green Belt, greenfield sites and Areas of Outstanding Natural Beauty. The Vale District Council only seeks to address sustainability from the developers' perspective, ignoring the environmental strand. Participation in a recent parliamentary Select Committee forum, regarding the implementation of the NPPF, highlighted that the government's intention was that *all* strands of the NPPF sustainability criteria are equally considered and *all* should be satisfied to allow development. It is not a matter of a balance towards sustainability, developments are either sustainable in their entirety, or they are not. The Vale's Local Plan has not adequately addressed the sustainability of the allocate sites on all fronts. There is no sound infrastructure planning for footpaths, play areas and natural and amenity green space. Reports produced by the Vale fail to address the current state and capacity of the facilities or the impact the Local Plan may have on the use of these facilities.

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Re: Core Policy 7 - Providing supporting infrastructure

- **Infrastructure and public transport** - much of the housing is due in the first five years, predicated on jobs that may or may not be there and infrastructure improvements that almost certainly won't be there. The NPPF requires that plans identify and *co-ordinate* development requirements, including the provision for infrastructure. The Local Plan does not offer adequate assurance that infrastructure projects will be carried out in a timely and co-ordinated manner. Simply saying the Vale is 'preparing a new and comprehensive Infrastructure and Community Benefits Strategy' is not good enough. This should be produced, costed and scrutinised in tandem with the Local Plan and, indeed, be an integral part of it. How can the validity of the Local Plan be assessed with little information regarding detail of infrastructure improvements? Housing needs to be directly linked to job creation and infrastructure improvements should come before house building to alleviate congestion and reduce environmental impact. There is no indication of how the Vale proposes to achieve their deliverable goals with regard to infrastructure. The A420 is already over capacity without the current developments underway, let alone the predicted building along its route. The Local Plan only involves land allocation for two junction improvements with no increase in capacity. The problems of the A34 and A417 are well documented. There is no firm commitment to public transport and leaving it to market forces within private enterprise is not satisfactory. The Evaluation of Transport Impacts document implies there is capacity on the A420 for future developments. This is in complete contrast to the findings of the 'Transport Route Congestion Assessment on A419/A420/A415 Link' by Bob Hindhaugh Associates Ltd, produced on behalf of the Western Vale Villages Consortium and presented to the Vale of White Horse District Council in response to the emerging Local Plan Part 1, and now enhanced by a document suggesting Necessary Infrastructure Requirements (both documents attached). The report stresses the existing hazards, design flaws and defects along the A420 which have not been addressed in the Local Plan and suggests any increase in vehicular movements along its length will add to the problems and place all road users at risk of incident. The Local Plan does not seek contributions to mitigate the direct effects of the developments on the A420 which already acts at capacity at peak times. The lack of a localised economic development plan will inevitably lead to the majority of new residents commuting along this route. The Vale District Council is relying

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on developer-led Transport Assessments as a mechanism to secure funding, rather than specify their requirements to improve this strategic link. How can the Local Plan be considered robust if this has not been decided and costed? Oxfordshire County Council is working on a transport prospectus but this is a long term project with no measurable outcomes as yet. There has been no consideration of the cumulative impact of expansion in neighbouring districts, e.g. the Eastern expansion of Swindon on the Western Vale's resources and infrastructure. Mike Murray from the Vale spoke at the stakeholders meeting to say that, 'there might well be a degradation in infrastructure', as infrastructure will follow, rather than precede the occupation of houses. The Vale states that new developments should not adversely affect existing residents. This is clearly no longer the case. The Plan, therefore, cannot be considered to be effective or sound.

- **Health provision** - the Local Plan does not tie development to improvements in Healthcare provision and facilities. The District Council are too willing to 'pass the buck' to Oxfordshire County Council as *their problem* rather than address the need for increased facilities with increased housing numbers. The emphasis is too much in favour of developers in an unwillingness to reflect the true cost of development and the required increase in infrastructure. Villages on the fringes of the Vale, such as Watchfield, suffer by coming under the umbrella of Health provision from neighbouring authorities. We are consequently ignored by the Vale as a responsibility of Swindon Primary Care Trust and ignored by Swindon as residents of the Vale of White Horse. There is no evidence of cross-border co-operation to ensure such residents do not fall through the net in both authorities. The NPPF requires plans to provide accessible local services that reflect a community's needs yet there is no sound infrastructure planning for health and emergency services.
- **Schools** - again, the District Council simply passes this responsibility to Oxfordshire County Council as *their problem*. Only very large scale developments have been considered in tandem with new schooling provision with smaller 'major' developments simply incurring a *pro rata* contribution with no consideration of the cumulative effects of this vast numbers of new housing.
- **Broadband** - there is no firm commitment to link technological infrastructure to development. Consistent and fast Broadband is an integral part of living and working in rural areas, yet most villages suffer from a substandard or absent service. There should

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be a parallel commitment to match broadband infrastructure to development within the Local Plan

- **Deliverability** - there must be penalties set down for developers who do not complete the houses for which they have been granted permission within a short time frame. This is important as housing numbers are counted as completed dwellings rather than those for which permission has been granted. Consequently, it is very likely that the Vale will pass permission for vastly more housing than even specified in the SHMA. Merely stating that development must begin is not satisfactory and will not stop the 'landbanking' of our precious greenfield sites? The Vale's approval of housing construction, long before it is clear whether the jobs are there to be filled, is vulnerable to the consequences of a shortfall in economic growth targets. Without an independent assessment of the economic forecast relied upon by the SHMA the scale, direction and deliverability of housing is unsound.

Re: Core Policy 4

- **Consultation** - The report to the Council about the consultation process ignores important procedural and policy challenges and seriously understates opposition to the proposals voiced in the several thousand written comments received and at the public meetings convened to discuss the plan. The Village scoring system has been prepared with no local consultation or knowledge. Shrivenham and Watchfield are mentioned in the Local Plan as if we were conjoined villages when we are, in fact, separate entities. The key strand of the Local Plan to promote thriving villages takes a generic approach with no obvious local knowledge. Focusing development in Shrivenham will not maintain the vitality or sustainability of local services. These are at breaking point already and the residential nature of the majority of the village means there is no scope for retail expansion. Primary Care facilities at Elm Tree Surgery are already overstretched. Employment opportunities will involve commuting by virtually all new residents along the A420 corridor, already at capacity. None of these points brought up during the consultation process were referred to or addressed.

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This version of the Local Plan still appears developer-led and, if implemented, will adversely affect existing and future residents of the Vale. We ask that these concerns are fully addressed before proceeding.

Watchfield Parish Council, would like the opportunity to participate, directly or via a WVV representative, at the oral examination of the Local Plan and/or to present further and more detailed evidence in support of some or all of the representations set out. We also wish oral evidence, and any further written evidence which may be required of him by the inspector, to be presented by our road transport consultant Bob Hindhaugh and/or his associate Simon Boone.

Yours faithfully,

Sue Nodder
Chairman Watchfield Parish Council

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