

From: Roger Turnbull [REDACTED] >
To: <planning.policy@whitehorsedc.gov.uk>
Date: 24/12/2014 20:42
Subject: Fwd: Submission to Vale Local Plan 2013

Ben Davis (?),

SUBMISSION TO VALE LOCAL PLAN 2031.

I attach my submission to the Local Plan 2031 Sustainability Appraisal.

I submit this in response to your telephone reply dated 22nd December, (in response to my phone call on 19th December) agreeing to allow me to submit it

anytime up to 24th December, Christmas Eve.

The Council form for submitting a response is no longer available on the Council's website.

I have therefore submitted it as an e-mail, the only form of submission available to me.

Please confirm that this submission is acceptable to the Council as within the time limit, as previously agreed in your phone call dated 22nd December.

kind regards,

Roger Turnbull, Director of Apt Planning Ltd.

Begin forwarded message:

> From: Roger Turnbull [REDACTED] >
> Subject: Fwd: Submission to Vale Local Plan 2013
> Date: 24 December 2014 20:29:27 GMT
> To: planning.policy@whitehorsedc.gov.uk
>
>
>
>> Ben Davis(?),
>
> thank you for your telephone reply to my phone dated 19th December, in which I sought advice on how to object to the Sustainability Appraisal because it was not
>
> possible to use the Council's preferred method for a submission, using the same form as for the Local Plan 2031.
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>
> You confirmed that I could make a submission any time up to Christmas Eve on 24th December, on the grounds that you did not reply to my message until 22nd
>
> December at 10.35 am.
>
>
> I attach below my submission to the Sustainability Appraisal, which incorporates a summary of my previously submitted objections to the Local Plan 2031,
>
> as sent to Hendred Parish Council, which formed the basis of their objection.
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>
> Please confirm that you will accept this further objection, which summaries my previously submitted submission to the Local Plan and its Sustainability Appraisal.
>
> I will send this as an e-mail, and if successful, as an attachment to the e-mail form provided by the Council.
>
> OBJECTION TO SUSTAINABILITY APPRAISAL, incorporating the SUMMARY OF ALREADY SUBMITTED

SUBMISSIONS dated 19th December 2014.

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>> COMMENTS SENT TO HENDRED PARISH COUNCIL FOR THEIR SUBMISSION TO VALE LOCAL PLAN 2031.

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>> POLICY 2 DUTY TO CO-OPERATE.

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> The previously submitted submission concerned the failure to provide evidence to support the Vale meeting the unmet needs of adjacent Districts, and proposed an

>

> amendment requiring a review of the Plan before allocating further development to meet the needs of adjoining Districts, particularly Oxford City.

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> I draw the Inspector's attention to the March 2014 OXFORD FUTURES Plan prepared by the Oxford Civic Society, which provides a framework for meeting the fu ture

>

> needs of Oxford City within its own boundaries.

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>> POLICY 3 SETTLEMENT HIERARCHY

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>> Objection based on Policy 3 being unsound, due to a conflict with national planning policies supporting sustainable development by focusing on development within or adjacent major settlements

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>> with the widest range of jobs, shops and facilities, and greatest opportunities for travel by foot, cycling and public transport, rather than being dependent on the private car.

>>

>> The latest Vale Annual Monitoring Report shows that in the Vale between 2001-2011:

>>

>> 72% of new dwellings were located in Towns

>> 15% of new dwellings were in Larger Villages

>> 10% of new dwellings were in Smaller Villages

>>

>> Policy 3 proposes only c.3,000 dwellings in Market Towns, with greatly increased housing in Larger and Smaller Villages than the current Local Plan.

>>

>> Policy 3 would therefore significantly increase the % of new development in Larger and Smaller Villages, contrary to the principles of sustainable development.

>>

>> Developments of over 50 dwellings in Larger and Smaller Villages with under 500 dwellings is likely to affect the character, appearance and countryside setting, esp. in AONB, of existing settlements.

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>> The proposed amendment would add development west of Didcot, and at Grove, to the category of Towns as Didcot has a population of 25,000 pop.

>>

>> The amendment would delete Harwell Campus, Rowstock and Milton Heights from the categories of Larger and Smaller Villages, as they do not have the characteristics of Villages.

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>> POLICY 4 & 5 MEETING HOUSING NEED, AND HOUSING SUPPLY RING FENCE.

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>> Objection based on being unsound due to the forecast growth of homes and jobs being unrealistic, and hence contrary to Government policy that proposed allocated must have a realistic prospect of being

>>

>> implemented, as set out in paragraph 22 of the National Planning Policy Framework (NPPF).

>>

>>

>> i) it fails to take sufficient account of housing demand near Didcot being met in the South Oxfordshire Core Strategy proposals for 6,300 new dwellings at Didcot in its April 2014 Housing Land Supply Assessment.

>>

>> Thus the Plan anticipates house completion rates increasing from 367 dwellings p.a. (2001-11), to nearer 1,300 dwellings p.a, with the addition of S.O.D.C. proposals in Didcot, instead of 1,000 dwellings p.a.

>>

>> Under the 2014 Oxfordshire SHMAA, South Oxfordshire is considering proposals to significantly increase development in Didcot in their 2014 Local Plan Issues Report.

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>> ii) it fails to make sufficient provision for windfalls, and should be amended with a policy to support infill and redevelopment within Towns, Large and Small Villages, which reduces the need for allocations.

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>> Between 2001-11 a significant proportion of new housing was completed on windfall and redevelopment sites, e.g. St Mary's School, Wantage, Moreland Brewery, Abingdon, etc.

>>

>>

>> iii) Unlike the Milton Keynes growth area, the rate of development above economic trends is not based on a growth policy in the South East Regional Plan, to meet housing/job needs in a Sub-Regional capital

>>

>> of 250,000 pop, by diverting homes/jobs from adjoining Planning Authorities in Buckinghamshire/Bedfordshire, where development is constrained by Green Belt and AONB.

>>

>> The preferred economic forecast in the SHMAA, Projection 4, is over and above the forecast economic growth in the South East and Oxfordshire, as represented by the alternative Economic Baseline Forecast.

>>

>> It could therefore be described as "double counting" the current economic baseline forecast, because it does not explain where the additional growth will come from.

>>

>>

>> iv) The proposed ring fence provides no certainty that the current commuter patterns of the Vale acting as a dormitory area for commuting to Oxford, Reading, Swindon, Newbury, and London will not continue

>>

>> or even be increased by the Plan's proposals. Low salaries in scientific research will make much of new market housing unaffordable to new jobs in scientific research.

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>> PROPOSED AMENDMENT TO POLICIES 4 & 5.

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>> Objection to the both the scale of development, which should only allocate land for homes and jobs based on the SHMAA Projection 3, the Economic Baseline Projection in Table 31-32.

>>

>> and the lack of a phasing policy, which should only released additional land for development above Projection 3, the Economic Base Projection in the SHMAA, based on plan monitoring,

>>

>> after a review of the Local Plan.

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>>

>> The proposed amendment to Policy 4 proposes for 2011-31:

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>> NEW DWELLINGS: 12,400 dwellings, instead of the proposed 21,000 dwellings, (i.e. 623 dwellings p.year, compared to 367 dwellings p.year completed 2001-11, and 578 dwellings p.a. in the South East Plan), and

>>

>> NEW JOBS: 11,000 jobs, instead of the proposed 24,000 jobs (i.e. 550 jobs p. year) compared to 570 new jobs between 2001-11, a 1% increase p.a. which is twice the forecast 0.5% p.a. for Oxfordshire.

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>> POLICY 6 MEETING BUSINESS AND EMPLOYMENT NEEDS

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>> The policy is unsound because it does not provide sufficient focus on redeveloping existing employment sites in Towns, and at Didcot Power Station, before sites in the rural area and AONB, e.g. at Harwell Campus.

>>

>> The incentive of lower business rates for new companies coming to the Enterprise Zone ends in March 2015, so there is no certainty that these incentives will any longer apply.

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>> This objection supports the Highway Agency objection in 2009 which sought redevelopment to create Class B Business jobs in the Towns, to mitigate the adverse affect on the road network of jobs in the countryside.

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>> The Science Vale UK Study justifies the proposed 2% p.a. growth in jobs in the Vale,(24,000 new jobs), as also being achieved at Milton Keynes, the fastest growing town in the South East Region.

>>

>> However, this growth rate was only achieved over a 40 year period since 1970, based on Structure Plan policies to divert development away from the rest of Bucks and Beds County areas to a Sub-Regional Capital.

>>

>> The current Milton Keynes Core Strategy reduces new housing from 52,000 dwellings in the South East Plan to 28,000 dwellings, on the grounds that any increase in new housing or jobs above the rate in 201-11

>>
>> was unrealistic. There are significant differences between Milton Keynes (250,000 pop.) and the Vale.
>>
>>
>> The preferred employment forecasts estimate that two thirds of new jobs will be in finance and business. However, with the exception of Milton Park, neither Didcot, Harwell Campus or Wantage is an
>>
>> established centre for finance and business, so it is more likely that new jobs in this sector will be attracted to Oxford, Reading, Swindon, Newbury or London, than the rural area of the Vale.
>>
>> Clarification is sought on how the forecast growth in home-working, arising from the growth of self-employed, is likely to effect the demand for new jobs requiring new employment land.
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>> The Economic Forecasting to inform the Oxfordshire SHMAA Table 6.2 also showed that there would be a significant surplus of site capacity of 7,000 jobs on employment land,
>>
>> above the forecast growth in jobs on employment in Oxford City.
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>> Oxford would be a much more sustainable location than the Vale, where development is constrained by Green Belt, AONB, and rural areas comprising mainly villages of less than 500 dwellings, e.g. East Hendred.
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>> The proposed amendment is for the plan to allocate sufficient land for 11,000 jobs, instead of 24,000 jobs, for which there is unlikely to be a need for new employment allocations.
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>> The proposed 219 hectares of employment land is similar to total existing employment land in Milton Keynes, which is forecast to provide up to 40,000 new jobs, so its implementation is likely to be unrealistic.
>>
>> Rural Districts with similar characteristics to the Vale, such as Green Belt, AONB, and adjoining a City constrained by Green Belt, like South Oxfordshire and Tewkesbury (which is meeting housing needs
>>
>> which cannot be met in Gloucester/Cheltenham, and also attracted 5,000 jobs (201-11), propose 13 hectares of employment land (S.O.D.C.) and 35 hectares (Tewkesbury where 10,000 new dwellings are proposed).
>>
>>
>> The Oxford Growth Board estimated that the Enterprise Zone would attract 8,000 jobs by 2015 on 2 million sq.ft of business development. It was unrealistic.
>>
>> It estimated that 70 hectares of new employment land was needed (2010-15), 24 hectares (2015-20), and 100 hectares (2020-30). This is the first opportunity to challenge these forecasts at a public inquiry.
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>> At Harwell Campus the number of jobs has grown from 4,000 in 2006 to just 4,500 jobs 2001-11, against an estimated growth of 4,500 jobs in the current Local Plan 2011, and repeated in the Local Plan 2031.
>>
>> The growth at Milton Park 2001-11 is now estimated to be limited to just 1,600 jobs, whilst at Culham the European JET project is transferring to France, leaving to a fall in employment.
>>
>> Clarification is sought on what allowance has been made for existing businesses leaving Harwell Campus due to redevelopment or other reasons, making the net increase appreciably lower.
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>> The net increase described in the background evidence only refers to businesses transferring into the Enterprise Zone from elsewhere within the surrounding area.
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>> POLICY 15 SOUTH EAST VALE SUB - AREA.
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>> My objections to Policies 3,4, 5, and 6 have consequential implications for Plan Policy 15. An objection is therefore made to Policy 15.
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>> My proposed amendments would therefore seek to change Policy 15, for the reasons given in my objections to these earlier policies.
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>> POLICY 17 TRANSPORT DELIVERY FOR S.E. VALE.
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>> My objections to Policies 3, 4, 5, and 6 would significantly reduce the numbers of housing in the Vale, and hence the need for travel, and thus reduce traffic demand on the road network.

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>> An objection is therefore made to Policy 17.

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>> The Vale is predominantly a dormitory area for commuters to Oxford, Swindon, Reading, Newbury and London.

>>

>> There is no certainty that the level of housing proposed will not reinforce that travel pattern of commuting, given the much greater numbers of jobs in these towns than is proposed in Science Vale UK.

>>

>> The low salaries of scientists despite their high skills means that, as now, many employees in scientific research would be unable to afford to buy the proposed new dwellings.

>>

>> My objection to Policy 17 is consequential to my earlier objections to Policies 3 - 6.

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>> When Vodafone were granted planning permission for a European Headquarters, it was conditional on the funding of a double the existing number of bus services in Newbury.

>>

>> The introduction of the Community Infrastructure Levy should enable up to £10,000 per new dwelling to be available to improve pedestrian/cycling/bus services in the Vale.

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>>

>> The Plan should support new transport infrastructure focused on providing opportunities for travel apart from the private car, in accordance with national planning policies.

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>> Clarification is sought on what bus and cycle network, in similar detail to the road proposals, is proposed to be implemented, and how it will be funded.

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>> The proposed cycle network does not appear to demonstrate a Duty to Co-operate, through continuous cycle routes to adjoining Districts incl: West Berkshire, Oxford, South Oxfordshire, West Oxfordshire, Swindon.

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>> PROPOSED HOUSING ALLOCATIONS IN THE APPENDICIES.

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>> A consequential objection is made to the following proposed allocations:

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>> 1. Milton Heights (400 dwellings) - Milton Heights should be deleted from the list of settlements in the Settlement Hierarchy.

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>> - the scale of development relative the the scale of existing buildings and its limited services is unsustainable development,

>>

>> which will adversely have an urbanising effect on open countryside.

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>> 2. East and North of Harwell Campus - will constitute large scale development in the AONB.

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>> - Harwell Campus should be deleted from the list of settlements in the Settlement Hierarchy as it does not have the characteristics of a village.

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>> - There is no demonstrable need for 21,000 houses, as Option A for 13,000 dwellings will have fewer significant environmental effects.

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>> - Natural England and the AONB Board have objected.

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>> -The public views from footpaths in the AONB will be adversely affected, as footpaths will adjoin the urban area rather than have views over open countryside.

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>> 3. The reserve site for 1,000 dwelling at Rowstock - Rowstock does not have the facilities of a village suitable for large scale development. It should be deleted from the list of Small Villages.

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>> - The countryside setting of East Hendred and its Conservation Area would be affected by large scale development between Harwell and East Hendred.

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>> - It would increase pressure for continuous development between Didcot and East Hendred.

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>> - The A34 provides a strong defensive boundary to development at Didcot,
development at Milton Heights, Harwell Campus and Rowstock would breach that
>>
>> boundary.
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>> THE SUSTAINABILITY APPRAISAL.

>> An objection is made to the Sustainability Appraisal on the basis that the proposed alternation strategy is not demonstrated to be the most appropriate compared to the alternatives, as required by national policy.

>> The Sustainability Appraisal determined the choice of the preferred option, and hence it is necessary to object to the Sustainability Appraisal to justify proposed amendments to the Local Plan.

>> The Sustainability Appraisal considered a range of options from Option A for 13,000 dwellings, originally supported by the Council as their preferred option, to Option G, for 21,000 dwellings.

>> The Sustainability criteria makes clear that the increased housing in Option G will have significant environmental effects and the effects of generating significantly more travel by car.

>> It states that these environmental effects can be dealt with by detailed design and development management policies.

>> There would appear to be greater impacts on Environmental Criteria 3,7, 8, 9,10 and 11 in the preferred option G, than the lower level of housing in Option A.

>> Many of the impacts are considered to require monitoring. Clarification is sought as to whether even with monitoring the preferred Option G can be demonstrated to have less negative impacts than Option A.

>> Clarification is sought as to how the proposed mitigating measures will result in no significant environmental effects on villages of up to 500 dwellings in a rural area from an additional 8,000 dwellings,

>> and how there would be no greater impact than the originally preferred option of 13,000 dwellings.

>> A significant environmental effect of the increase in dwellings in Option G is the need to housing allocations in the AONB, which would not be necessary under Option A.

>> The sustainability appraisal does not take sufficient account of the additional dwellings in Option G not being located at existing Towns, where the most jobs, shops and services are located.

>> Option G is therefore a less sustainable form of development.

>> The basis of the choice of Option G for 21,000 dwellings was the recommendation of the SHMAA, which has not been tested against past trends, or whether the proposals are realistic.

>> The SHMAA recommendations were based on the Oxford Growth Board's proposals for 219 hectares of new employment land which has not been backed by robust evidence or tested at a public inquiry.

>> The Oxford Growth Board's employment proposals were prepared without sufficient assessment of their implications on new housing and infrastructure or the environment.

>> For example at Harwell Campus all of the five sites considered for additional housing are considered to have a High/Medium Landscape Impact Value, subject to objections from Natural England,

>> and the North Wessex Downs AONB Board.

>> Clarification is sought as to whether in paragraph 13.3 the Sustainability Appraisal considered the option of no new housing allocations in the AONB at Harwell Campus.

>> Given that Option A for 13,000 dwellings was an original preferred option of the Council, there was an alternative to new housing allocations in the AONB, and hence exceptional circumstances do not exist

>> to justify large scale development in the AONB, as required by national planning policies.

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>> The sustainability appraisal considered a range of 143 -173 hectares of employment land. The proposed 219 hectares of employment does not seem to be within the range tested.

>>

>> Now that the benefits of the Enterprise Zone will terminate in March 2015, consideration should have been given as to the lower rate of new jobs than has been achieved with the benefits.

>>

>> Otherwise it is difficult to justify why the benefits were originally approved.

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>> Clarification is sought on how many jobs could be achieved at Didcot Power Station instead of at Harwell Campus, given is more sustainable location.

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>> Roger Turnbull, Director of Apt Planning Ltd.

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>>

> ATTACHED BELOW IS A REQUEST BY EAST HENDRED PARISH COUNCIL FOR A STATEMENT THAT THE GROWTH OF JOBS SOUGHT IN THE LOCAL

>

> PLAN WAS UNREALISTIC AND EXAGGERATED, AND HENCE THE GROWTH IN NEW DWELLINGS WAS NOT SUPPORTED BY ROBUST EVIDENCE.

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>> On 11 Dec 2014, at 13:19, Charles Pappenheim [REDACTED] > wrote:

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>>> Hi Roger,

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>>> Thanks for your interesting input at last night's meeting.

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>>> You pointed out that the employment numbers for the Vale were exaggerated by double-counting jobs which were already accounted for in South Oxfordshire, which you felt amounted to a failure to consult with that district when preparing the plan.

>>>

>>> This point was new to me (and to John as well, I think). Could you send us a succinct, fact-based statement of this, for possible inclusion with the PC's comments?

>>>

>>> Regards,

>>> Charles.