

The Planning Team
Vale of White Horse District Council
Benson Lane
Crowmarsh Gifford
Wallingford
OX10 8ED

17 December 2014

Dear Sir/ Madam,

Nicola Blackwood MP: Submission to consultation on Vale of White Horse Local Plan 2031

I am writing as the local Member of Parliament regarding The New Local Plan 2031, and to make representations on behalf of my constituents who have raised their concerns with me.

Firstly, I would like to be clear that I am acutely aware of the need for housing in the Vale, and indeed across the whole of the county. It should not be an impossible dream for nurses, teachers, social workers etc. to be able to own a home in Oxfordshire, and I have been struck by the number of people unable to find somewhere to live as a result of the undeniable shortage of homes locally.

A recent report by the Centre for Cities has ranked Oxford the least affordable city to live in; ahead of London.¹ This is because we are experiencing some of the fastest population growth in the country, and the lack of new affordable homes is pushing up prices and effectively pricing residents and workers out of the city and nearby towns and villages altogether.

While speaking to local businesses I am frequently told that the cost of housing is the greatest limit to their growth and to their ability to recruit locally. The Trust Secretary of Oxford Health NHS Foundation Trust has explained to me just how serious an issue the impossibly high house prices in Oxford are. I understand the Trust is struggling to recruit and retain frontline staff and, as a result, are having to pay higher agency fees to recruit agency staff which can then impact upon outcomes. This is an important issue and is one that has been raised in the OUH NHS Trust Integrated Business Plan (July 2013) which states that it has '*affected recruitment for many years*'.² I am told it will again be raised in the updated Business Plan, due to be published in early 2015, and is also being discussed at Executive Board level at the Trust.

¹ Centre for Cities, [Delivering Change: Building homes where we need them](#), October 2014.

² Para 4.9, [OUH NHS Trust Integrated Business Plan](#), July 2013.

Clearly, the only way to address the shortage of available homes and provide enough space for people to live in line with our predicted population and jobs growth can only be to build more homes.

Here in Oxfordshire, we have a strong economy with a high demand for housing, and there are a variety of reasons for such high demand and, in turn, expensive housing. We have a beautiful natural **and** built environment, and a proud tradition of creating towns and villages where people want to live. I firmly believe this should, and can, continue. Given the irrefutable housing pressures and predicted growth for the county; Oxford has recently been identified as one of the country's best cities for economic growth in 2015³ and Oxfordshire's total population is forecast to grow by 93,000 in the next 15 years⁴, I do accept that revision and redefinition of the Green Belt is permitted under the National Planning Policy Framework (NPPF) for the compilation of the Local Plan.⁵ Further to this, aside from small portions of Botley, all parts of my constituency which lie within the Vale boundary are Green Belt and so there could not be any non-Green Belt alternative.

That said, I would stress that the Planning Authority must be mindful to fully engage with local communities and find a way to supply this much needed housing in a sensible and measured way and not in such a way that causes genuine and material damage to our natural environment.

I therefore wish to set out my views on what I see as two key imperatives for the Vale of White Horse District Council, which are the importance of proper planning for our local infrastructure and secondly the importance of the release of Green Belt land **only** in exceptional circumstances so as not to damage the landscape setting.

Infrastructure

I have repeatedly made clear my belief that we must have infrastructure before expansion. With a number of large developments being consulted on across my constituency I have made this point to all Local Authorities, and I firmly believe that if we are going to keep pace with forecast population and economic growth, as outlined above, we must not only have the necessary homes but also a strong system of infrastructure in place to be able to cope.

Without investment in infrastructure the sites are considerably less suitable. Oxfordshire County Council (OCC) and Vale of White Horse District Council will need to work together to ensure that the ambitious expansion proposed for some sites is met with the necessary funding. In areas such as provision of waste collection and roads the ambitious house building of the District Council cannot be successfully delivered without key infrastructure investment from OCC.

A number of my constituents have expressed their deep concern that the Infrastructure Delivery Plan (IDP) produced by the Vale is inadequate, as information from NHS England and the Clinical Commissioning Groups (CCGs) is missing.⁶ Therefore the Vale is unable to provide necessary assurances as to how health care providers can ensure health care is sufficient and fully funded.

I would also like to reiterate several of the points made in my previous submission that some of the villages drawn upon in the Local Plan simply do not have the infrastructure to support such extensive development. This includes roads, pavements, flood protection measures, schools, medical services,

³ UK Vitality Index 2015, Lambert Smith Hampton, December 2014.

⁴ Oxfordshire County Council, [Population forecasts](#), January 2014.

⁵ Para 83, [NPPF](#), 2012.

⁶ Para 11.3, Infrastructure Delivery Plan, October 2014.

provision for shopping and leisure needs, public transport, parking etc. Where infrastructure lags behind development this inevitably leads to a degradation of services.

On roads specifically, the Oxfordshire Local Enterprise Partnership's Strategic Economic Plan (SEP) states that:

"Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees. These (and other) capacity restrictions limit business efficiency and investment, and the ability for communities to access the full range of services".⁷

I have welcomed the recent announcement of £50 million for improvements at the Botley and Peartree junctions, along with a longer term Feasibility Study to determine the future of the A34. But we do still desperately need improvements Lodge Hill. I have been campaigning for a diamond junction at Lodge Hill, and clearly capacity issues along the route are a barrier to growth and will only be exacerbated by an increase in housing.

There are, of course, also major traffic issues on roads such as the A420. Oxfordshire County Council (OCC) has committed to a Route Strategy for the A420 as part of the new Local Transport Plan, but I have consistently heard concerns that it will not be complete until Spring 2015.

Green Belt

Many of my constituents who have contacted me with their concerns on the Local Plan, have cited the erosion of the Green Belt as their key concern. The NPPF, is clear that once established, Green Belt boundaries should only be altered in 'exceptional circumstances' through the preparation or review of the Local Plan.⁸ It also reaffirms that the 'fundamental aim of Green Belt land is to prevent urban sprawl by keeping land permanently open; the essential characteristic of Green Belts are their openness and their permanence'.⁹ Clearly therefore, there is a duty placed upon the Planning Authority to take account of the particular characteristics of the area concerned, and not to approve development that will unacceptably harm the Green Belt.

The NPPF is also clear that Green Belt land serves a key purpose to prevent the merging of nearby settlements. From conception, one of the core founding pillars of the Green Belt has been to prevent converging conurbations.

This is an issue I raised in my previous submission, with particular reference to Radley and Kennington. I am therefore pleased that the North Radley site has been removed. However, there are still outstanding issues with regard to this clearly stated aim of Green Belt land.

While I do appreciate the difficulty in obtaining suitable sites in an area which is predominantly Green Belt, I have specific concerns about a number of sites explored within the Local Plan and associated documentation, as set out below.

⁷ Page 33, LEP, [SEP](#), March 2014.

⁸ Para 83, [NPPF](#), 2012.

⁹ Para 79, [NPPF](#), 2012.

NORTH ABINGDON

Infrastructure

Few local people would disagree that we suffer terribly from capacity problems on Oxfordshire's roads, much of which is generated by congestion on the A34 and its junctions and slip roads. These problems are further exasperated by daily in-commuting and residents and businesses alike are affected on a daily basis by delays and poor journey times between Abingdon and its surrounding villages.

I was clear in my previous submission that I do not oppose in principle the construction of new homes on sites in North Abingdon. However, I do feel strongly that more work is required to ensure our road network and transport infrastructure is up to the job of coping with thousands of additional houses throughout the Vale.

While I am pleased that the site at North Radley has been removed, I am concerned about the large increase in dwellings at the North Abingdon on Thames site. The number has increased from 410 in the first draft of the local plan to 800 currently; almost double. I have serious concerns that the number of homes could place unsustainable strain on local infrastructure.

Severe infrastructure problems constrain economic productivity and growth across the region. I was delighted when, earlier this month, the Chancellor of the Exchequer announced £50 million for improvements at Botley and at Peartree, plus a Feasibility Study to examine the long term future of the road as a strategic route, however I made clear in my previous objections that the Vale must ensure investment at the Lodge Hill junction in Abingdon to be able to cope with expansion.

Lodge Hill did not qualify for the funding round announced most recently, but I believe a full diamond junction here is essential in relation to future planning and specifically to alleviate congestion to/ from the A34 at Abingdon. At present, drivers using the A34 southbound can leave the road at Lodge Hill, but there is no equivalent interchange for northbound traffic and therefore no means of joining the A34 from north Abingdon to travel south. As I have said previously, funding for a diamond junction at Lodge Hill must be a priority project for VOWHDC going forward.

Green Belt- Village Separation: North Radley

I understand that, in forming the second draft, the Vale have commissioned a Landscape and Visual Feasibility Study, which has reiterated that the site in North Abingdon does not make a contribution to several of the specifications on Green Belt land under the NPPF (namely checking the unrestricted sprawl of Oxford and preserving the setting and special character of historic Oxford), but that it does have functions in '*safeguarding the countryside from encroachment and assisting urban regeneration*'.¹⁰ The report therefore states that any proposals for development on the study site would need to take these factors into consideration.

My constituents are concerned that extending the North Abingdon site into Radley will diminish the gap separating the northern edge of Abingdon from Radley. In fact, the Green Belt review undertaken in February (Phase 2 report), stressed that this land was vital in preserving the separation of Radley and Abingdon.

¹⁰ 2.3.2, [Land and Visual Feasibility Study](#), Hankinson Duckett Associates, August 2014.

As mentioned above, the NPPF makes clear the role Green Belt land plays in preventing the merging of nearby settlements. Again, I would advise caution in designating this number of dwellings across this site.

CUMNOR

Green Belt Review

In line with the NPPF guidelines, I am pleased that VOWHDC have removed the Cumnor South site from the draft Local Plan, where 200 new homes were planned off Appleton Road, citing that it would have exceeded the recommended capacity for homes for this location and cause unacceptable harm to the character of the landscape. However, this release has given rise to new concerns for my constituents. The site is included in the Green Belt Review Phase 3 Report, published by Kirkham Landscape Planning Ltd in November 2014, as one for potential release (areas 6 and 24). Indeed, in the Consultation Statement submitted by VOWHDC it states that *'a smaller development site may be appropriate for allocation in the village within the Local Plan 2031 Part 2'*¹¹

This has understandably led to concern locally that the picturesque village of Cumnor and its character will be adversely impacted as a result of the Vale's planning priorities.

As I set out in my submission to the consultation on the first draft of the Local Plan, rural villages such as Cumnor are typically defined by their epicentres. For example, a historic church, 200 year old houses, a traditional pub, pond/ Village Green. In Cumnor, all of these are contained in the small official Conservation Area which lies adjacent to the site identified for Green Belt release.

In re-drafting the Local Plan, the Council's Sustainability Appraisal clearly states that the site was removed as it *'exceeds landscape capacity recommendations'* and would be *'harmful to landscape character'*.¹² My constituents therefore cannot understand why the site has been identified for removal from the Green Belt and identified as desirable for development in the Local Plan Part 2.

BOTLEY: CUMNOR HILL

Green Belt Review

Also within the Green Belt Review Phase 3 document, a site within the Botley designations at Cumnor Hill has been earmarked for the potential release from Green Belt designation (area 8). This is a particular cause for concern, as development here would inevitably obscure beautiful views over to Wytham Woods.

The Green Belt Review Phase 2 Report undertaken in February 2014, was clear that the open land in the wooded estate lands and farmland which extend over the hills including Hurst Hill, Cumnor Hill and Harcourt Hill are *'important in containing Botley whilst the open arable land provides an important landscape to these assets'*.¹³

¹¹ Para 133, [VOWHDC Consultation Statement](#), October 2014.

¹² Para 12.4.1, [Sustainability Appraisal](#), October 2014.

¹³ Page 32, [Green Belt Review Phase 2 Report](#), February 2014.

Village separation

I am concerned that development stretching from Botley along Cumnor Hill already impacts negatively on the gap between Cumnor and Botley, therefore we must maintain the openness and sense of separation of the two settlements wherever possible.

Infrastructure

Cumnor Hill is an already congested area, as is Botley more broadly. Significant increase in traffic brought about by additional homes is likely to have a detrimental effect on local residents and would be unsustainable within present infrastructure.

Further, local healthcare provision is under strain and there are fears locally that it would not be able to cope with an increase in housing provision. I would urge VOWHDC to seek confirmation from local health bodies that sufficient mechanisms would be put in place in order to be sustainable. As discussed above, residents are understandably concerned that this is not addressed within the IDP.

APPLETON

Infrastructure

Within the Green Belt Review Phase 3 Report, two sites in Appleton are due to be taken out of the Green Belt (areas 7 and 25), suggesting it is earmarked for future development, potentially within part 2 of the Local Plan.

Again, Appleton is an area suffering from congestion, particularly in relation to the A34 and the A420. As outlined above, there are serious traffic issues on both the A420 and the A34, both of which could be eased by the creation of a full diamond junction at Lodge Hill in Abingdon and I would urge VOWHDC to ensure this is a priority in taking any decisions about development in Appleton.

Green Belt Review

Appleton with Eaton Parish Council have serious concerns about the suitability of these two sites for development. It is their view that, in keeping with the character of the local area, there should only be minor development i.e. smaller developments. I do not believe that the Local Plan Green Belt review takes this into consideration, primarily because it cites two areas for Green Belt release.

I am told they have informed VOWHDC of their view that the ground within Area 25 is wet and therefore entirely unsuitable for development. There would also be issues with access to the land, as surrounding roads are narrow. Further, land at Area 7 is seen to be too large, and the Parish Council believes it is vital that development here does not encroach on the agricultural activity of the adjacent farm buildings.¹⁴

The Phase 3 report does state that care should be taken to ensure development does not have an adverse impact on the open character of the adjacent Green Belt, but I would argue that in taking two sites out of Green Belt designation the character of Appleton would be diminished.

¹⁴ Appleton with Eaton Parish Council objections, December 2014.

Conclusion

While the Vale has a duty to plan effectively for the future and in line with Oxfordshire's predicted economic and population growth, like many of my constituents I am concerned about the high number of Green Belt sites designated for release and I do not necessarily believe quite as many rural sites as identified should be earmarked for development. I do accept that the release of some Green Belt is necessary, and the Vale has to take these difficult decisions. Clearly, however, the Vale should firstly be prioritising Brown Field sites and regeneration sites, and no decision about Green Belt revision should be made with anything other than the utmost concern for its impact on future generations.

I am clear on my concern that the site removed from the first draft of the Local Plan Part 1 in Cumnor South has been identified for Green Belt review and, as such, is likely to be built upon in the Local Plan Part 2. This has left residents worried for the future of their much loved village and would have an adverse, lasting effect, on Cumnor Village.

It is also vital that, expansion in the Vale is preceded by substantial infrastructure investment and local residents will need to be reassured that the VOWHDC will ensure this happens to a satisfactory level and in advance of any impact from additional development. Any potential development cannot be sustainable if the location chosen is incapable of providing the necessary infrastructure. At times, even now, the basic infrastructure in these villages can fall short of an adequate level and I am not convinced that the assurances are provided in the Infrastructure Delivery Plan. In particular, we need to see a diamond junction at the Lodge Hill interchange in order to keep pace with development proposed for Abingdon; an area which is already operating over capacity.

While clearly challenging, I believe it is possible to find appropriate locations for very necessary housing in such a way as to work with local residents and avoid material damage to our much loved Green Belt land.



Nicola Blackwood
Member of Parliament for Oxford West & Abingdon