



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Miss

First Name

Layla

Last Name

Moran

Job Title

Parliamentary Spokesperson

(where relevant)

Organisation

Liberal Democrats, Oxford West
and Abingdon

(where relevant)

Address Line 1

27 Park End Street

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Post Code

OX1 1HU

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : Layla Moran

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

1, 7 and 13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

x

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

x

4 (3) Complies with the Duty to co-operate

Yes

No

x

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see end of document.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy 1 Modification

The SHMA figures should be recalculated and based on more realistic values for economic and population growth. They should also take into account the environmental and social constraints of the local area, in particular the presence of the Oxford Green Belt and the lack of major infrastructure planned to sustain the communities.

Policy 7 Modification

Each site in the plan should be looked at in the light of representations made by the local community and concrete plans for major infrastructure works in the future. In particular the sites at Radley, Kennington and North Abingdon should be removed.

Policy 13 Modification

Each of the 18 sites can be shown to serve an important part of the Oxford Green Belt and should not be removed. Furthermore, in light of inconsistencies in the District's Green Belt review and given the fact that a wider, County-wide review is yet to begin, all Green Belt and AONB sites to be removed from the Green belt should not be modified at this time.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:


Should I be the MP after May 2015 I hope that I can speak in that capacity.

That said, as the Parliamentary Spokesperson for the Liberal Democrats I have been liaising with residents and councillors across the constituency of Oxford West and Abingdon. We have the vast majority of councillors in this area and the Local Plan is already becoming a major election issue. I have already made contact with thousands of people here about the issues arising from this plan and by June I will have extensive knowledge of the subject and be able to articulate the broad view of this community.

I hope my contribution will complement and draw together the more local representations on specific sites which I know many residents have made to you.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

17/12/2014

Answers for Q5.

1. **Policy 1:** Policy 1 refers to the sustainability for these plans. I do not agree that they are sound as there are major flaws in the assumptions underlying them, in particular the figures presented in the SHMA. I am also concerned by the lack of any integrated plan for the infrastructure needed to support this level of housebuilding.
2. The SHMA was commissioned by the Oxfordshire Growth Board which comprises the leaders of the local district councils and local partners and is based on the Economic Growth Strategy. The company that performed the SHMA, G L Hearn, cannot be seen as impartial and independent as they are themselves developers and therefore have an evident interest in encouraging future development.
3. This is the first and only time that the community has had a chance to comment on the Economic Growth Strategy and the SHMA that flows from it. This is democratically unsound and therefore it cannot be said to be 'positively prepared'. Local people, businesses and groups deserve to have a say in how they wish to see the shape of the economy in years to come and how many houses they can tolerate. I hope that the inspector reads the CPRE critique of the SHMA in detail. The summary can be found here:
<http://www.cpreoxon.org.uk/news/item/download/649>
4. The NPPF is very clear in that it requires a balance between economic, social and environmental aims. I do not believe that the plan achieves this.
5. Quoting from paragraph 154 of the NPPF: 'Local Plans should be aspirational but **realistic**.'
6. I urge the inspector to consider the fact that this plan represents a rate of building equating to roughly 3.5 times that achieved at any time in the last 10 years. There is a very real worry that unless we can actually achieve this very ambitious rate of building then after a few years we will be back to developer-led rather than plan-led development. To illustrate, we have had developments locally that have taken 35-50 weeks to source the bricks needed to commence work.
7. It is my considered opinion **that this rate of building is not realistic** given the current local planning systems in place, the availability of labour and the strength of local community engagement with these processes. Residents are well resourced, highly educated and have been prepared on several occasions to take inappropriate developers to court. A good example of such a campaign is the West Way Community Concern group that successfully defeated a planned shopping area in Botley. As we speak they remain mobilised to take the developer on should they appeal and, had they lost, they were prepared to consider the possibility of going to Court on behalf of the Community. If we adopt this plan with these numbers we will be at a real risk of falling behind our targets very quickly and opening

ourselves up to planning by appeal – the very thing this plan hopes to avoid.

- 8.** I urge the inspector to approach the underlying figures on which this plan is based with a critical eye and listen carefully to the community as this will be the first and only opportunity they have to contribute meaningfully to this process..

Policy 7: Infrastructure

9. I am further concerned with the lack of considered thought given in these plans to the infrastructure needed to sustain such a significant increase in houses.
10. The local area is served by the A34 and A40. The A34 in particular is seen by the government as being one of the 'worst roads in the country' for congestion and has already attracted £50m to make changes to the Botley and Peartree interchanges and commission a study into further improvement.
11. While we would hope more money is forthcoming, none is confirmed and the cost for a full upgrade of the A34 is estimated to be in the order of £800m. With the national deficit still an issue at this time it would be foolish of anyone to suggest that this money will be found in time to make a difference in the first decade of this plan.
12. There are also many instances of schools being oversubscribed and a lack of local amenities for residents. These are not adequately planned for and will often span Districts.
13. I urge the inspector to give weight to each submission made by local residents and groups about their specific areas. I give the example of North Abingdon below but point out there are many across the constituency.
14. I hope the inspector takes this into account when looking at specific sites in this plan. To 'hope' that the infrastructure needed will materialise in this economic climate is nothing more than wishful thinking and should be avoided.

15. Example: North Abingdon

The road infrastructure in Abingdon is very strained. Gridlock at the centre is unbearable despite several attempts to ease the flow. It is clear that any increase in traffic in Abingdon would result in an adverse impact that is likely to outweigh any economic advantage of development.

Residents have been calling for a full diamond interchange at Lodge Hill for nearly 20 years. As it stands there is no way to go South on the A34 from North Abingdon which forces commuters to travel through the very congested Town Centre to join at the next junctions. The homes planned for In North Abingdon are confirmed not to generate enough CIL to build the interchange needed and their realisation is therefore likely to make the traffic even more unbearable for residents across Abingdon. This is in addition to the extra pressure to the Dunmore Road and Twelve Acre Drive which currently act as a 'distributor road' for the Town.

The local primary schools are already oversubscribed but again the size of the development does not allow for a new school to be built, thereby implying children will have to travel longer distances, thus further increasing the burden on the roads. Moreover, residents have very few local shops or doctors

surgeries within walking distance. Again neither of these facilities are planned for and this will only result in ever greater use of the car to carry out day to day activities.

Without infrastructure improvements for North Abingdon planned for in advance we cannot claim that any major development in Abingdon can be called sustainable. It must be noted that development in Kennington and Radley should be considered in the same light as, given their proximity to Abingdon, the increase in the residents in these areas will also put pressure on the North Abingdon infrastructure. In my view this development would contravene Paragraph 173 of the NPPF and should not be included in this plan without a clearer picture of how it can be made viable..

- 16.** Taken as a whole, I therefore conclude that this plan cannot claim to be sustainable without a credible infrastructure plan to accompany it. Not just in North Abingdon but across the area. Such a plan is under development by the Oxfordshire growth Board, but again at the time of this submission substantial work on it has not even begun. It is therefore impossible to say, even speculatively, how the needs for local infrastructure will be met.

Policy 13: Oxford Green Belt

17. I cannot stress enough how passionately local communities in the constituency of Oxford West and Abingdon feel about this issue. I have received hundreds of representations calling for the piecemeal development on Green Belt sites to be removed and a petition calling for the same thing has surpassed 1,000 signatories and is rising rapidly. The general feeling is that the Green Belt is there to protect not just open space but also the identity of settlements. In particular, people do not want a ribbon of development between Oxford and Abingdon.
18. Given how overly ambitious this plan is and the likely inward pressure from the lack of housing needs being met by Oxford City council, there is a real risk that any sites that are removed from Green Belt will be developed in the near future, especially those within close commuting distance to Oxford. Even if sites are not in the plan itself, there is a strong likelihood of missing the building targets and therefore facing speculative development..

Government Policy

19. This plan contravenes the Government's own policy and guidance for the Green Belt and there is overwhelming evidence locally that many of these sites contravene one or more key principles of the Green Belt.

The NPPF is very clear on this matter. Paragraph 79 states:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Then paragraph 83 states.

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. "

20. The inference could not be clearer; the Green Belt is to be considered a constraint of development, not a land bank to be released when the Local Plan gets tricky.
21. This plan identifies 1,510 homes to be built on green belt land. This would likely not be needed should proper consideration be given to the sustainability and deliverability of the SHMA figures as presented. Representing just 7% of housebuilding in the plan, removal of these sites still leaves a significant amount of housing to be developed.

- 22.** Inconsistencies between the VOWH Green Belt review and later modifications to the Local Plan shows how unsound the Green belt review was to begin with.

VOWH Green Belt Review – lack of consultation and inconsistencies

- 23.** Residents feel that they have not been adequately consulted on both the specific sites and the idea as a whole. Many of them expressed dismay at this being their only chance to be able to comment on the proposals. I would thus ask the inspector to give weight to the number of representations made at this stage. While the Vale technically complied with the statutory requirement, they did nowhere near enough to engage with the public. I accept the line was not crossed and therefore the process is legal, but I do not accept it was adequate.
- 24.** This Green Belt review was commissioned in 2013 when it became clear to the Vale that they would be unable to meet the housing need without extra land. Therefore the clear priority was to release the land rather than undertake an objective assessment of the merits of each site. There was an obvious conflict of interest for the Vale to undertake the review given the perceived pressure it was under and therefore the impartiality of the review should be called into question on that basis alone.
- 25.** The case for what has changed since the March 1991 Green Belt review has not been made adequately and I would encourage the inspector to look at this document.
- 26.** There are 18 sites included in these plans, all of which lie in Oxford West and Abingdon constituency, yet only 4 sites are proposed for development. This is misguided and dangerous on two fronts. First, each site is very close to Oxford City so pressure to develop them in the near future, even if they are not in this plan is very high. Second, taken together, they represent both an encroachment of the open space between Oxford and Abingdon and would therefore contravene one of the main tenets of the Green Belt which is to avoid towns merging into one another.
- 27.** The 5 principles of the Green Belt are :
- I.** To check the unrestricted sprawl of large built-up areas
 - II.** To prevent neighbouring towns from merging into one another
 - III.** To assist in safeguarding the countryside from encroachment
 - IV.** To preserve the setting and special character of historic towns
 - V.** To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 28.** In the table below I have taken each of the 18 sites and identified which of the principles I feel have been contravened and why. In addition to the below, please refer back to paragraph 17 of this submission which outlines why the 4 sites of the 18 that have been identified for development are unsustainable.

	Green Belt Principles Contravened	Comment
1. Abingdon (East)	I, II and III	Abingdon is already a large Town with significant infrastructure issues. The roads of Dunmore and Twelve Acre Drive represent natural boundaries to the Town and currently serve as a distributor roads running along the outside rim on the city. Taking this site out of the Green Belt is clearly urban sprawl that also encroaches on open countryside. It also makes the gap between Abingdon and Radley so small as to be meaningless. Additionally, the late inclusion of the site to the East is contrary to the advice of the Vale's own consultants. This underlines the fact that this Green belt review has an inherent conflict of interest whose sole purpose is to find and release land, even when it is inappropriate to do so.
2. Appleton (North)	III, IV	Appleton is a village with a strong independent rural identity and is already bordered by the A420. Extra development here significantly changes the character of the village and therefore changes the setting of this historic village (it appears in the Domesday Book and can be documented as early as 942BC but possibly earlier). The sites also encroach on the countryside.
3. Appleton (South-West)	III, IV	
4. Botley (North)	I	Botley is the first village to the East of Oxford and already has a suburban identity to the West, which borders the Seacourt Towers retail development. The Green Belt has served as an important check to the urban sprawl of Oxford and these four sites represent the first important break in this sprawl.
5. Botley (South)	I	
6. Botley (East)	I	
7. Botley (West)	I	
8. Cumnor (North)	II, III, IV	Cumnor is an exceptionally beautiful and picturesque Village that also appears in the Domesday Book. The community considers itself distinct and independent. It has a small historic village centre surrounded by newer developments along the main road leading to the historic centre. A key feature of this village is its close proximity to fields. It is
9. Cumnor (North-East)	II, III, IV	
10. Cumnor (South)	II, III, IV	

		worth noting that this site was included in earlier iterations of the Local Plan and later dropped as it was deemed to be damaging to the village's character to build there. This clearly refers to the rural situation of the village and therefore the Vale's own analysis suggests that these sites should not be included in this review. Cumnor's beauty and proximity to Oxford makes it a prime development for any Oxford City overspill in the lifetime of this plan or in future plans. I strongly urge the inspector to keep this site in the Green Belt to protect it from future development.
11. Cumnor (West)	II, III, IV	
12. Farmoor (North)	III	This site's close proximity to the reservoir means the environmental sustainability of the site is questionable.
13. Kennington (North)	II, III, IV	There are serious sustainability issues with this site especially regarding local school places, flooding issues and amenities. There is also clear encroachment on the countryside. Kennington is again an ancient settlement and documented in the Domesday Book therefore special consideration should be given to maintaining its historic setting and distinct identity.
14. Kennington (South-West)	II, III, IV	
15. Radley (South)	II, III	The inclusion of this site is completely unacceptable. Especially in light of the Kennington and Abingdon sites. Taken together these sites amount to an effective extension on Abingdon northwards and the gaps between settlements will be effectively removed to anyone living there with any long range views gone forever. The Vale's own 1991 review states how precarious this is and nothing has changed since then.
16. Wootton (North-East)	II, III	This is a small Village strongly characterised by its rural setting. Removing all 3 sites, in light of the developments at Kennington and Radley again amount to both encroachment on the countryside and the views between the villages to the North and South are compromised. Like Cumnor, Wootton's proximity to Oxford will put it under particular pressure in the future.
17. Wootton (South-East)	II, III	
18. Wootton (South-West)	II, III	

- 29.** Finally, I would like to point out that an Oxfordshire-wide Green Belt review has been initiated by the Oxfordshire Growth Board. This has not yet begun. Therefore the inclusion of any of these sites is premature and should be done on a County-wide basis. Given that the plan to do this is already in place, I urge the inspector to remove at 18 sites from this Local Plan.
- 30.** The 1,510 shortfall can either be compensated by refining the previously argued SHMA figures and also as part of Phase Two, should any of these sites be proposed as part of the wider review.

Duty to cooperate:

The Oxfordshire Growth Board has (according to its minutes from November 20th) agreed to undertake a 'Post SHMA Strategic Work Programme' which sets out how they plan to cooperate. This includes an Oxfordshire-wide Green belt review which will not be complete until June 2015. Therefore until this coordinated effort has been made this Plan cannot logically comply with the duty to cooperate.