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Date: 24/12/2014 12:01
Subject: Local Plan critique by Harbour and Harbour

Name of Plan: Vale of White Horse Local Plan

Part A, Personal Details

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Part B

My objections relate to 1. legal compliance and 2. to Soundness of the Plan.

1.1) I wish to object to the Local Plan Part One 2031 on the basis that it is not legally compliant. I am not a lawyer, and on account of my illness I have not been able to identify the relevant core policies against which I can test the legal compliance, but I have a fairly good understanding of common law and on this basis I think I can make a case that the public consultation is not fit for purpose, with inadequate policies for consultation and sustainability appraisal.

1.2) I first heard of the local plan [Note 1.1] when I read in the local paper in Mid November 2014 that there would be a meeting in the Abingdon Guildhall on 19th November. I heard, either through the article or from discussion with friends, that there was a plan to build in the Green Belt, something I had understood to be strictly against planning policy and unlikely to be permitted.

1.3) Before I attended the meeting, I had a quick look at the two very small, very difficult to read leaflets distributed by the Vale, "Supporting Growth in the Vale" and "The Future of the Vale". The former begins "The Vale has to find space for 20,560 new houses before 2031." A fait accompli apparently. Then they said they had asked my opinion twice before: I didn't know that. I also googled building in the Green Belt and promptly found that according to the national Policy Framework, 2012, the Green Belt has essential characteristics to keep land permanently open. But this aspect appears in neither of the two documents provided and from my notes taken at the meeting, there was little or no discussion of the Framework, nor even much emphasis on the five key purposes of the green belt, according to the Framework. And yet this is fundamental to all that ensues, but to all intents and purposes it was ignored.

1.4) But worse than this, there is a document "Councils must protect our precious green belt land" <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>, published on October 4th 2014, a document that makes it perfectly clear that building on the green belt is against planning policy, essentially reinforcing what is clearly stated in the Planning Policy Framework, but this document was neither referenced in the two aforementioned leaflets from the Vale Council nor was it mentioned at the public meeting.

1.5) At the meeting itself, when eventually I was permitted to speak I raised the matter of the Planning Policy Framework and the five key purposes of the green belt and then gave an instance of why the particular bit of green belt on the North side of Abingdon should not be built upon. I was put down unceremoniously with an ad hominem argument about how I might like walking in the green belt but we have to build houses. There was no ensuing discussion of the five key purposes, nor was there any chance to come back on the point due to extensive exposure to what seemed like property developers in the audience.

1.6) My final point on the matter of legal compliance is that although I have lived in the area for 43 years, have an extensive knowledge of the area [Note 1.2] from driving, walking, cycling and canoeing, although I founded in the seventies an organisation called the Abingdon Planning Action Group, I was unable to identify most of the areas that were discussed at the public meeting because there were very few maps of any quality presented and areas were identified by the name of a road or some other shorthand, which would be understood by someone living very close by but not by the average member of the public. If I was unable to identify the areas, I imagine most other members of the public would have suffered a similar problem. The real problem here was that the speaker presenting the details did not show maps on the screen when he was discussing any particular site for development, so we were left to study our pathetic little leaflets to try to supplement what was missing from the presentation, leaflets that I have already indicated were inadequate for the purpose.

1.7) So to summarise, we were unaware of the areas during the meeting, the leaflets provided did not give a clear idea of what is legally permitted and the emphasis was almost entirely on where to put the houses and why the construction in the green belt was unavoidable, as well as how the infrastructure would be provided for out of CIL etc. I believe that few if any in attendance had any inkling that they might be able to challenge the consultation on the ground of legality, but it is pretty clear to me that there was a policy to steer clear of such discussion and the

omission of the October 4th document points strongly toward the idea that there might have been a conscious aim to avoid such significant details.

1.8) Due to serious illness, my objections are on important points but in less detail than I would have wished and with very much less in the way of references than desired. I hope that in the circumstances that my submission will be treated as a valid one. If requested to do so I would be willing to amplify and/or annotate my submission.

1.9) Finally I would like to attend the Examination in Public for any or all of the above discussion. I would hope and expect that ill-health will not prevent me from developing my arguments more clearly and in more detail so I can defend the points I have made.

[Note 1.1] I am surprised I heard nothing previously as I read the local paper nearly every week and am in regular contact with councillors over other matters, as will be verified by the leader or by many other councillors. But I would suggest that the idea of building in the green belt is so revolutionary that there must have been a massive failure to inform the public to I would have heard of these plans earlier.

[Note 1.2] I have an extensive background in the area, having lived in Abingdon for 43 years, and worked in the Abingdon Area as a scientist at Culham laboratory and at the Joint European Torus (the JET Project under Euratom Management) and as an Associate Lecturer with the Open University, teaching at sites in Abingdon, Oxford, Witney, Aylesbury, Banbury, Newbury, Reading, Bletchley, Milton Keynes, Henley and High Wycombe.

2) I wish to object to the Local Plan Part One 2031 on the basis that it is unsound.

I give a brief description of my reasons below, and how to avoid the Vale and Oxfordshire from being spoiled, losing character and identity should me the plan go forward as proposed.

Regarding Core Policy 4 and policies related thereto, especially CP 8,13, 15, and 20

2.1) Strategic Housing Market Assessment (SHMA) is unsound and unsuitably to be relied upon as the basis for sustainable development.

2.1.1) As soon as I heard that there was a projected 40% expansion in housing forecast, In the period to 2031, I looked at the ONS forecasts for population increase in the UK over a similar period. I soon deduced that the increase was forecast to be about 10%. So where does the 40% figure come from and how might it be justified? One can imagine Oxfordshire experiencing boom-like growth compared to the nation as a whole, and there are certainly tendencies to focus growth in the southeast if unchecked by government policy, but even allowing for no control whatsoever it is difficult for me to envisage growth of even as much as 20% in the context of 10% nationally because people would rapidly decide that the development was too rapid and the infrastructure facilities, despite all pleas to the contrary, would be inadequate and unfit for purpose.

2.1.2) Also I have lived through a series of building booms during my seventy five years, and have seen the remarkable surge in house prices that occurs during such a boom, accompanied by scarcity of materials and skilled labour, the boom is eventually choked off by rising prices and reduced demand, a demand which is very much price-related. The cost of any kind of construction work during such a boom goes through the roof, so this is followed by a huge wave in DIY activity. The booms of the sixties, the early seventies and the nineties were scarcely able to match those of the late thirties when for a brief period of five years, with cheap labour, cheap land and much unspent capital, the peak building was at a rate of about 330,000 houses per year (private plus state-built) [Conan Boyle, The house building boom in England during the 1930s. proc IAHS European Network for Housing Research, September 1992]. Conan Boyle claimed that this rate of construction had never been equalled, once demolitions were taken into account. I even took part in the construction of Welwyn Garden City, where I worked there briefly in the late fifties, so I learned how the shortage of "brickies" was dominating the work and said brickies were able to hold the management of their construction company to ransom by demanding extra bonus money and were willing and able to strike to achieve their aims, whereas the common labourers and sub-contractors were left in the lurch, unable to benefit from the unsatisfied demand for skilled bricklayers. Little has changed to this day. Despite all wishes to construct at a very high rate, there is no way the planned construction rate will ever be achieved without some extraordinary change in government policy. Such a change might be to resume the construction of council houses, so holding the value of houses down to a sustainable level. It was noticeable in the graphs in the Conan Boyle paper that Local Authority construction increased by some 60,000 units a year while Private Enterprise housing decreased by a similar amount between 1935 and 39.

2.1.3) The Oxfordshire SHMA has been severely criticised by a number of organisations. In an independent critique for CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two, and this is in complete accord with my own estimates in para 2.1.1 above.

2.1.4) The basis of the estimates seems to emanate from the local enterprise partnership, allowing commercial providers of jobs and housing to egg each other on in over-optimistic forecasts, and there has been no serious academic study to look at the figures in forensic detail. Accordingly the figures are untrustworthy, should not be relied upon and should be scrutinised severely to discover what would be a more realistic estimate. one test of the expansions forecast in Oxfordshire would be to obtain the expansions proposed for every local plan in the country and to add them all up. It would be amazing if the total of all the estimates looked realistic or affordable for the country as a whole, but that should be one of the foci of further research into housing needs.

2.2) In summary, the Vale should have assessed the figures given to them against social, environmental and infrastructure considerations. While they have paid some attention to the affordability of the infrastructure, their figures even for that do not seem to make much sense once the full panoply of the required infrastructure is taken into account.

Regarding Core Policy 13 Oxford Green Belt, Core Policy 8 - spatial strategy for Abingdon and Oxford fringe sub-area and also Core Policy 15

- Spatial Strategy for the SE Vale sub area

2.3) Unquestioning acceptance of the SHMA figures has led to plundering of the Green Belt and the North Wessex Downs AONB. I will focus upon the green belt aspects, because that part of the green belt between Oxford and Abingdon is of amazing strategic importance and it has already been raided by what was regarded as a final expansion of Abingdon in a northerly direction in the early nineties, when 1600 houses were built to complete the Long Furlong and Dunmore estates and were germane in eventually allowing the completion of the Abingdon peripheral road, which was intended to contain northerly expansion once and for all. Development North of the peripheral road will turn that road, already at full capacity and more during peak periods, into an overloaded town road. But worse still green belt will be lost forever. It is my understanding that four development sites have been identified in the Green Belt to accommodate 1,510 houses and that a further 11 sites are proposed for removal from the GB. Once they are made available for construction, that is where developers will start first, because the infrastructure has been promised and there will be no barrier to their applying for planning permission, except that we can confidently forecast, on the basis of precedent, that they will apply to build more houses per hectare than had been envisaged and with fewer units of affordable housing because these would, they would claim, detract from the marketability of the rest of the houses. The Green belt for quick profits, great for their shareholders (including me!) but disastrous for the local area and its amenities and attractiveness, quite apart from the severe ecological damage. As far as I understand, amongst the gobbledygook planning terminology we have been exposed to, every small settlement in the green belt, frequently related to small farm communities, is treated as a potential site defined by in the imagination stretching a string around the edges of the settlement and then in filling every unbuilt part contained within the string. Maybe it is worse than that because maybe they allow the infilled areas to be rectangular and therefore to stretch the edges of the string still more. The point I am trying to make is that there is potential for huge expansion by using terminology that it would take a planning expert to understand but we as local citizens, as those most affected by untrammelled development, are unable to understand exactly what is the intention but we are justly fearful that once this process has been started it will never stop. So it should not be started at all.

2.3.1) The Green Belt, according to the National Policy Framework, 2012 was originally (in the thirties) intended to prevent urban sprawl, but its essential characteristics are to keep land
..... Permanently

.....Open.

Permanently in 2012 but plunderable in a massive way in 2014. To state that this is remarkable is to understate the situation in large measure. To wonder whether the plundering of the Green Belt is being forced upon us by uncritical use of figures originating from the lobbying of property developers is our natural response.

2.3.2) The five key purposes of the Green Belt are

- (i) to check sprawl
- (ii) to prevent towns merging
- (iii) to safeguard the countryside
- (iv) to preserve historic towns and
- (v) to recycle derelict and other urban land.

2.3.3) Looking at the proposals for the space between Abingdon and Oxford there seems to be little or no respect for the five key purposes, least of all the fifth one. In considering any planning application (and it is noted that the Local Plan is not a planning application but it will open the floodgates to many such) the requirement is to avoid harm to the green belt and only to allow development in very special circumstances, which do not exist unless the harm is clearly outweighed. Is it outweighed? My aim is to establish the harm. The question of outweighing must be examined in the light of my claim that the SHMA seriously overestimates the requirement, rendering the doing of any harm whatsoever to be against the 5 key purposes and without excuse of greater good or lesser harm.

2.3.4) Of the five key purposes I recognise that many will focus upon the first, third and fifth. I state without proof that these are all relevant here and that by paying attention to the fifth one there can be a partial solution to where to put the houses if really needed. I wish to concentrate on the second and fourth.

2.3.5) To prevent towns from merging. This key purpose is peculiarly applicable in the case of the green belt between Oxford and Abingdon. Apart from being located upon opposite banks of the Thames, the two towns could not be more different and do not share anything like the same history. The status of Oxford, the county town of Oxfordshire, is well known and I need not dwell upon it. Abingdon was formerly County Town of Berkshire. It contained the Abingdon Abbey, one of the most powerful opponents of Henry VIII, and was then a truly significant location. Abingdon has some claim to be the oldest continuously inhabited town in the country, but when the railways were developed during the industrial revolution, Abingdon's decision makers refused to allow the GWR line to be routed through the middle of the town, even though there were property developers building speculatively at the West End of the town in the hope of making a quick profit from such development. One such was Winterbourne, who built most of the stone houses around Spring Road and Marcham Road. I used to live in Spring Terrace, which is peculiarly located and was said to have been constructed as the Abingdon Railway Hotel. History shows that never transpired and eventually Reading became the County town of Berkshire, while Abingdon was eventually subsumed into Oxfordshire in the seventies. But there was never an intention to subsume Abingdon into Oxford. And that is why I claim that the Green Belt between Abingdon and Oxford is of such strategic importance.

2.3.6) To preserve Historic Towns. I think the case I made above makes for a requirement to preserve historic Abingdon. Why, if we have such an important historic town, must its development proceed ever more towards Oxford, rather than across the Thames towards Nuneham Courtney, Clifton Hamden and Culham, or to the South? A quick glance at a google satellite view will show the lop-sided nature of Abingdon, with ever greater bulges in the direction of Oxford, creating a town with severe transport problems for residents in the North, who live too far from the town centre for easy use of bicycle or walking and this process will be extended if the proposed Green Belt construction is allowed to go ahead.

2.3.6) Looking in more detail at the proposed sites up towards Lodge Hill and on the Eastern side of the Oxford Road, it is obvious that the proposed construction will wipe out the pleasantly rural view that those who go to work by bus experience as they leave Abingdon. There is very much a feeling of a town that knows how to contain itself but that very containment is under attack. The considerable gradient will allow the house owners to have wonderful views across the town and as far as the Berkshire Downs, but by the same token this housing will appear as an eyesore to those viewing it from the visible parts of Abingdon and from the Downs. The Vale lay great emphasis on how they are not planning to build to the top of the hill, but a few moments study of the contours and of their proposed upper limit will show that the appearance of the housing will be to blot out sight of even the top of the Hill. They appear to have forgotten that houses have a finite height, perhaps some nine metres higher than the ground level. and as far as I can tell the height reached will be ten metres below the top. a sketch with the hill contours and the house heights and locations or a study with a little trigonometry will rapidly show that the tip of the hill will be obscured. once that is appreciated when the building is completed, there will be nothing to stop further development to the top of the hill and beyond, as has been proposed by the City of Oxford in a recent publication.

2.3.7) Further aspects of the site include

- flooding - This area is a major collector of water feeding the springs that lead to relocation of the houses in the Long Furlong Area and which will affect the ecology of all of the area below it. If construction occurs there will either be too much runoff of surface water or there will be excessive drying of the subsoil, affecting the stability and ecology in an unquantifiable way. The regular flooding of the Western end of Twelve Acre Drive and the severe flows into the River Stort testify to the quantity of water that has to be dealt with. I had planned to do some calculations with regard to this problem but ill health has prevented that. I could do them in time for the examination in public. Sufficient to say for the time being that there will be considerable potential to interfere with the delicate balance that has been established in the water table in recent years and it is not worth the risk of making matters worse when it will affect so many residents on either side of the peripheral road in the future.

- noise and air pollution - The area planned to the West of Oxford Road is surrounded on three sides by roads carrying heavy traffic and that to the East, surrounded on two sides by these roads (A34, Oxford Road at Lodge Hill, and Twelve Acre Drive or Dunmore Road. This traffic is noisy and polluting. local residents know when to avoid going into the area on foot because it can be so unpleasant but living there would be insufferable and raising children surrounded by congested roads is against everybody's interest. I have taken a movie of the area and it is remarkable for its noise. I am about to post it on YouTube as soon as I have learned to edit it and to make the posting. The reference to the URL will be forwarded to the planning policy email address as soon as available and also it will be placed on the Longfurlongcommunitycentre website because I am a member of the community group that has submitted a major contribution towards criticism of the local plan. As a late joiner of the group I can say I support their arguments, have contributed towards them in small part, but that my contribution is essential distinguishable from theirs due to lack of time in preparing my story.

- ancient woodland - The area of ancient woodland to the North of the site on the West side of Oxford road has been neglected and makes me wonder how little the site H&S been investigated. I have extensive photographs and movies of the area and will post these on YouTube also as above. This woodland will be dangerous to children, will be an attractant for children, is part of the rural scene close to the top of Lodge Hill and is adjacent to an ancient trackway which is visible on the 1875 OS map and can still be seen on the Google satellite view of the area. This trackway must have linked Lodge Hill settlement with the Northcourt Centre and it also follows the North- South footpath parallel to and to the East of West Avenue, a path that was resurrected by appeal to the planning Inspectorate and reinstated by the County, just a few years ago. I attended that inquiry and participated, using the same argument, successfully it would appear.

- access- see ancient trackway as above. But if my objection fails and construction should occur then an imperative would be to provide quality cycling paths from the North at Lodge Hill into town. I suggest using the route that follows the River Stort and developing a good surface and good system of signposting. Cycle paths should be at the heart of any expansion of Abingdon or else traffic will become impossible or more impossible, should I say?

Reference Core Policy 7 Infrastructure

2.4) There is too little attention to cycling as mentioned above. I was a coauthor of a study on Abingdon's traffic "Dealing with Traffic" published in 199 by the group Abingdon Transport 2000. The recommendations of this group provided the basis of the adopted traffic plan for the centre of town. But the traffic system cannot absorb the proposed construction and development related traffic without major intervention. this has not been decided upon nor is it planned within the existing foreseeable budgets. There will be chaos if allowed to go ahead as planned. And there will be major cost and upheaval and serious alteration of the nature of Abingdon if the traffic is dealt with as needed. I would like to amplify that point and many others contained herein in the Examination in Public. I believe I have established that the Plan as it stands is ineffective and unsound.

Re core Policy 4

Consultation has been poor. I have already established this in my submission under the heading of legality in section one above. I will not repeat it here, but on the basis of what was said therein the Plan seems to be not positively prepared.

Consequently I request much lower housing figures and removal of all sites in the Green Belt and also by inference in the North Wessex Downs.

In conclusion this has to be submitted within minutes so I sign off by saying that I will proof read this after submission and correct any howlers but I will not add anything thereto. This submission is jointly by me and my wife, who shares the same details as me, above, but her name is Mrs Gunilla Harbour

Submitted by Dr Peter Harbour at 11.58 on 24 December by special permission

