

BOURTON PARISH COUNCIL

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Response to Vale of White Horse District Council Local Plan 2031 Part 1 – December 2014

Meaningful Consultation

The consultation process on the Local Plan has been poor from the start. The first consultation in February 2013 took place without concrete and key information on three major issues: overall numbers, transport strategy for the A420 and the actual sites to be developed in the larger and smaller villages. Had residents in the Vale understood exactly how many houses were to come and the vast percentage of inward migration being proposed, they would have been far keener to respond. This was an opportunity lost.

The second consultation process on the Housing Delivery Update was a sham. No information was posted directly to Vale residents and Parish Clerks were somehow expected to do that job for the Vale officers. This meant many residents in the Vale had no idea that a consultation was even taking place. This was unfortunate as that version of the Plan had adopted a truly huge increase in the numbers of houses to be built (20,560 houses) on the basis of the controversial SHMA report that has since been criticised by the public, organisations such as CPRE and politicians alike. Indeed in an independent critique of the SHMA commissioned by CPRE Oxon, a leading planning expert concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.

Those of us who were aware a consultation was taking place and attended the Shrivenham Public Meeting soon discovered that the presentation by Cllr Murray was a consultation in name only. It was merely a box ticking exercise. Talk (down) to the natives – TICK. An email circulated by the Parish Clerk at Radley confirmed that their public meeting was viewed in exactly the same way.

Vale residents who might have missed out on this second important consultation and who wanted to see what responses had been submitted by others in a consultation that ended on 4 April 2014 were unable to do so because these were not available on-line until November 2014 (by which time another huge tranche of information has been produced as part of the latest public consultation). This is unacceptable and ignores the fact that many people who genuinely want to join the debate to shape the future of the housing provision in the Vale need information in a timely manner. It is very difficult to make sense of the voluminous materials posted on your website generally, and in particular in rural areas with poor broadband connections, as here.

The report to the Council in October 2014 about the consultation process seriously understates the extent and degree of challenges and opposition to the proposals voiced both in the many written comments received and at the public meetings convened to discuss the Housing Delivery Update. Some important points were not properly reported; others were mentioned briefly and then ignored; and the sheer intensity of local opposition was bowdlerised. As a result, we believe Council members may have approved the Plan without an adequate knowledge of the outcome of the consultation.

Under 'New evidence' paragraph 80 of the report states that of the 2,717 responses to the consultation, 'the overwhelming majority [were] opposed to an increased housing requirement and the additional sites put forward.' And yet, when considering 'How did the consultation comments inform the Local Plan?' none of the concerns were specifically addressed. The report to the Scrutiny Committee in September 2014 regarding the responses to the Housing Delivery Update recorded that two petitions were received without even mentioning that another petition, signed by every resident in Shrivenham, had been handed to Cllr Murray when he hosted the Public Meeting. Perhaps he lost it on the way home?

Through the evolution of the Plan, the plan-makers in the VWHDC seem to have been driven by external considerations, and especially by their interpretation of the intentions of Central Government, rather than by a genuine wish to meet the wishes of the Vale community. This disconnection has culminated in a report on consultation to the Council which could be viewed as misleading. **We ask the Inspector to review the report against the consultation responses actually received and to consider whether the Council's decision to approve the Plan may have been made on inadequate information and therefore be invalid.**

This raises issues about the sincerity of the consultation, which must be meaningful to be lawful, and the effectiveness of local democracy which must both be aired rigorously at any VWHDC EIP.

Overall Strategy

The publication of this Local Plan 2031 Part 1, the earlier Housing Delivery Update Feb 2014 and the Local Plan 2029 Part 1 dated February 2013 continue to reinforce the current administration's decision at Cabinet on 9 March 2012 to favour Urban Focus rather than Urban Concentration (which was not favoured in the Preferred Options consultation of 2009 and which you admit included a "significant **minority** suggesting that some growth was appropriate in larger villages"). This is undemocratic. It is not what the residents in the Vale want and Paper 2, Paragraph 5.9 (published in February 2013) acknowledged "the potential negative effects, ie impact on the natural environment, culture and heritage assets of the Vale and potentially increasing greenhouse emissions". We question your overall strategy of building more houses in rural areas where people have very little option but to use their cars as public transport and facilities are inadequate, thereby adding to the Vale's well documented traffic problems. This is the least sustainable option and is in breach of NPPF 12 in "conserving and enhancing the historic environment".

Despite this, you are unwisely proposing to increase the Vale's housing supply by 40% and you are choosing 21 new development sites for the provision of 13,960 houses; some within the Green Belt and some in the North Wessex Downs Area of Outstanding Natural Beauty. This complete change of emphasis from Urban Concentration to Urban Focus will see strategic allocations of only 1,990 in the Abingdon and Oxford Fringe Sub-Area compared to 1,650 in the mainly rural Western Vale Sub-Area. Abingdon is, after all, the Vale's principal town. It is well located for employment and transport links, has a developed (and recently upgraded) town centre and a number of schools. The same could be said for the other main settlement of Botley which has **NO STRATEGIC SITES**. Allocating 950 houses to the smallest market town in the Vale, Faringdon, and 500 houses to the village of Shrivenham when only 1000 have been allocated to Abingdon, with none at all in Botley, cannot be sustainable. A Local Plan leading to decisions like that surely cannot represent a sound housing policy for the future of the Vale. This impact is being felt all across the Vale with the decisions you are making in developing these latest 21 sites, 10 of which are within the open countryside and have little or no prospect of employment and facilities able to support such growth. You admitted in the Housing Delivery Update that these sites are "smaller and more readily deliverable sites". In essence, they are the kind of sites that developers could only have dreamed of being offered back in 2009 when the far more balanced Preferred Options consultation took place.

I believe you will have a difficult job to persuade the Inspector at the EIP that you have taken the views of the vast majority of Vale residents into account at any time since February 2013.

Strategic Housing Market Assessment

The SHMA report proposes building 20,560 houses in the Vale to 2031 representing an increase of 7,430 from the Local Plan published in 2013. Demographic trends show that the Vale needs less than 500 houses per year and yet we are being asked to find room for 1028, with increased housing being proposed in the first 5 years. The District Council needs to be honest about where they think this enormous net migration into the Vale is coming from? If asked, most villages would not be in favour of this level of growth which will turn them into urban style dormitories for commuters to Swindon/Oxford/Harwell (and beyond) which will add still further to the Vale's traffic problems.

We do not believe that there is any published evidence that such targets could be achieved in a sustainable way, without damaging our local environment and overwhelming our infrastructure? We believe these figures are unwanted, unsound and unachievable. We believe you have a duty to supply and publish the evidence that the Vale has undertaken a proper analysis instead of just accepting these figures blindly as appears to be the case.

The risk of serious harm from over-allocation of house growth is very great. Builders' preferences for Greenfield land will lead to a more dispersed pattern of development, will put unnecessary and inappropriate pressure on rural Oxfordshire and will fail to encourage appropriate urban investment and regeneration. This will be damaging to Oxfordshire as an attractive business location and as a place to live. In particular, the damage to the countryside will be irreversible.

In adopting the SHMA figures so readily, the Vale of the White Horse District Council has cut out a crucially important stage in the process, identified in para 1.12 of the Oxfordshire SHMA Key Findings document itself, of testing whether the assessed housing need can be accommodated, and 'to identify where housing should go, and to plan for the supporting infrastructure investment which will be needed to ensure that growth is sustainable.'

This has led to our MP, Ed Vaizey questioning the then Housing Minister, Nick Boles, about his concern that the standard national methodology that has led to these numbers is over-estimating the actual demand locally and that "there are significant consequences for many local communities which are now faced with levels of growth that will fundamentally change the nature of settlements." He called for "an urgent review of the planning methodology that leads to such massive numbers of homes being planned so that more realistic outcomes result". He went on to point out that as so much of the land in the Vale is nationally protected land such as Green Belt, AONB and areas of Thames and Ock flood plains, surely a case could be made for reducing the population projections. This, along with the concerns of thousands of Vale residents, has fallen on deaf ears as the latest iteration of the Local Plan confirms.

This week we learn that the Communities and Local Government Committee have announced in their report that "*the Government must strengthen the planning framework to tackle emerging concerns about inappropriate and unsustainable development. The same weight needs to be given to environmental and social factors as to the economic dimension to ensure the planning system delivers the sustainable development promised by the NPPF.*" It is therefore possible that NPPF and related government policies may change.

Alas, the Vale's Local Plan is **proposing** inappropriate and unsustainable development and is paying scant regard to environmental and social factors.

It is essential that evidence such as SHMAs must be rigorously tested in order to establish that it is robust. This further work should not have been by-passed. It would have been an opportunity to challenge the overall level of housing provision which needs to be planned for. It would also have provided an opportunity to take account of environmental constraints and issues related to transport, school places, health provision and other necessary local infrastructure in considering how much development can be sustainably accommodated. The VWHDC has in our view failed in its

responsibility to the communities it represents by failing to allow for these factors in adopting the SHMA numbers without modification, and by precipitating land grabs for development on Geenfield sites throughout the District.

We therefore find Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 7, 8, 13, 15, 20 and 44 unsound. There can be no presumption of “sustainable development” based on the exceptionally high projections of housing need proposed in the Oxfordshire SHMA, which is itself unsound and unsustainable and should not be relied upon. We wish to be associated with all of the arguments put forward in CPRE’s submission regarding the unsustainability and unsoundness of the Oxfordshire SHMA.

Oxford’s Unmet Housing Need

Even more concerning are the positive vibes contained in the Duty to Co-operate to accommodate Oxford City’s unmet housing need which they are already saying they do not expect to be able to meet. Reports suggest that unmet need may be for as many as 20,000 homes. This is not surprising when the housing numbers have been so over-inflated. Discussions are already taking place with other authorities in Oxfordshire to decide where this housing might go. We object strongly to any suggestion that the Vale could increase its already unrealistic housing requirements to accommodate even more because of Oxford’s unmet need. This would just result in an increase in traffic from all those living on sites outside Oxford but who wish to access the city for employment, schooling, retail, cultural visits, health care etc etc with the resulting chaos on roads that are already highly congested. **The Vale’s Local Plan is unsound and premature bearing in mind the final housing numbers are unknown.**

Transport and Infrastructure Constraints

The main reason for the increase in the housing figures is the highly speculative “committed economic growth” being imposed by central government and by ambitious economics plans for employment at the Vale Science area at Harwell and Milton and in Oxford. Bearing in mind this is seen as the main new employment area in the Local Plan, why are 1650 houses being built in the rural Western Vale when it is blatantly obvious that the residents of these houses will need to travel to employment elsewhere? You are proposing this despite the requirement in NPPF Paragraph 158 that “strategies for housing and employment in local plans should be integrated” and that the need to “travel to work” should “be minimised” (NPPF 4.34.)

The Plan makes no realistic attempt to provide for employment growth in the immediate Western Vale area to counter the inevitable out-commuting that will result. It seems to rely almost entirely on existing available employment land at Faringdon which has been available for over 10 years without any interest from either developers or occupiers despite various initiatives from Government and Local Bodies to stimulate development.

From a market perspective this is not surprising as Faringdon is not, and never has been, a viable commercial centre as envisaged and simply building large quantities of new housing will not change this. There is no employment expansion potential at Shrivenham and with the considerably more prime opportunities emerging only a few miles away in Swindon and to the east with the Science Vale growth initiative, it is inevitable that businesses will prefer to locate in these areas, particularly when the main arterial route serving Faringdon and Shrivenham, the A420, is so notoriously congested.

We therefore object to such a huge housing growth in the Western Vale but particularly in Faringdon and Shrivenham, which have no possibility of providing anywhere near the amount of employment that will be required.

Much is made of Abingdon’s highway constraints “that could not be funded solely by development making it neither viable nor deliverable”, however the SHLAA report in Table 2 page 9 shows that

466 houses could be built in Abingdon 0-5 years and 2,715 are developable 6-15 years. Meanwhile, at this end of the Vale, there are severe highway constraints on the A420 that will have to deal with the huge amount of extra traffic that will be produced as a direct result of the 1700 houses in the A420 corridor at Shrivenham, Watchfield (recently built) and Faringdon not to mention the 8,000+ homes and 40 hectare warehouse employment site just across the Oxfordshire border East of Swindon.

In its Evaluation of Transport Impacts Stage 2 and 3a Report, the Vale rightly identified that the proposed strategic sites are likely to lead to some impacts on the A420, particularly around Faringdon and Shrivenham.

The Plan states that development in the area is to contribute towards upgrading the A420 and land has been safeguarded at the Faringdon and Shrivenham junctions. However, improvements to junctions to allow more traffic onto an already congested road is no solution. The independent Transport Assessment by Hindhaugh Associates, funded by the WVV Consortium in 2013, demonstrated that the A420 is already at capacity at peak times of the day with queuing from Bourton to Swindon being a regular occurrence. The local roads serving the villages in the Western Vale Sub-Area are often very rural and narrow and will be quite unable to cope with the “rat running” that an inappropriate amount of development along the A420 will cause. The only upgrading that will “help reduce congestion” is a full dualling of the A420 between Swindon and Kingston Bagpuize and clearly (to quote Abingdon’s reason for having a disproportionate amount of housing) “that could not be funded solely by development”.

The plan proposals are therefore simply not sustainable without a clear and unequivocal commitment, as a precondition to development, to the essential upgrading of the A420 (as well as the other main routes through the Vale - A34/A417/A338) as outlined in the document attached at Appendix 1 prepared by Hindhaugh Associates following on from their TIA produced in the Spring of 2013; and the recognition of and a plan to deter, the potential for “rat-running” through the Vale villages with the enormous environmental damage that will result.

In recognition of the adverse impact that these various housing developments would have on the Western Vale, Swindon Borough Council, the Vale District Council, Oxfordshire County Council and the Western Vale Villages - comprising of a group of affected parishes, entered into a Statement of Common Ground in April 2014. This statement sets out the common ground between the parties with regard to the Swindon Borough Local Plan and outlines all the Councils’ commitments to upgrading and improving road capacity on the A420. We are aware that until very recently no meaningful attempt has been made by any of the authorities to advance this understanding and turn it into policy.

We are aware that Oxfordshire County Council has committed to producing a Route Strategy for the A420 as part of its development of its new Local Transport Plan, but understand that this will not be finalised until the Spring of 2015. There is clearly therefore an obvious disconnect in that the urgently required modifications and improvements to the A420 will not be addressed until after the consultation on the Vale Local Plan closes. How can the housing allocations possibly be considered sustainable without an understanding of the infrastructure proposals in the Transport Plan?

It is obvious that essential improvements to the A420 should be a precondition to any housing development in the Western Vale. We therefore endorse the Western Vale Villages submission on Core Policy 7 of the Plan, which outlines modifications and improvements to the A420.

Your strategy of building 200/400/500 houses in the strategic sites in the villages in the Vale will put an enormous strain both on the highways infrastructure and on existing facilities. For example, how will the schools, doctor’s surgeries and local infrastructure cope? We object to the proposal to build 500 houses in Shrivenham which at present only has just over 900 houses. This is

disproportionate. Most of the new residents will be obliged to drive to places of employment as there are few local job opportunities, the nearest secondary school is in Faringdon, the doctor's surgery is already over-stretched and there are constraints to the old sewage system that serves the village. In Bourton we experience water pressure problems which will be exacerbated when the system has to cope with the extra demand of the houses in Shrivenham bearing in mind the supply for both villages comes from above Ashbury.

In 2013 the Vale identified a need for 14,300 jobs but by 2014 this has been inflated to the unrealistic figure of 22,980 new jobs. There is nothing to suggest that this is achievable and begs the question "Why are you allocating the housing sites to support a level of economic growth which is unlikely to be realised on such a scale?"

There is no evidence in the documents published that reassure us that any of this has been assessed either locally or more widely in the Vale. It appears to be the case that you wish to add houses to those areas where you can get away with not providing the necessary infrastructure and residents will just have to make do with what is available. In reality that will be a degradation of the services and facilities for the existing population which means that the Council is falling short of its obligations in this area. This represents a serious and unacceptable departure from good planning practice, which is all the more deplorable because of existing inadequacies.

5 Year Land Housing Supply

By accepting such unsustainable and unachievable figures you will merely exacerbate the problems for the future. If the targets aren't met, we will be back to square one on our 5 year housing supply, but having sacrificed some of our most precious landscapes and put unacceptable pressures on many local communities. This is not responsible behaviour and shows complete disregard for the environmental requirement of the NPPF.

Core Policy 3: Settlement Hierarchy

The Settlement Hierarchy on Page 37 is incorrect for the Western Vale Sub-Area as it shows East Challow, Shrivenham, Stanford-in-the-Vale, Uffington and Watchfield under Local Service Centre when you really mean they are Larger Villages. This is obviously a mistake. However we question a hierarchy which places Botley (as a Local Service Centre) lower down the hierarchy compared to Faringdon (a Market Town) when you compare their relative facilities, services and employment opportunities. Also the classification of "Market Town" assumes the facilities, services and employment opportunities are similar for Abingdon, Wantage and Faringdon when, quite clearly that is not the case. You say that "Market Towns have the greatest long-term potential for development" but that is not borne out by your housing allocations because you are unwilling to invest in the transport infrastructure to enable Abingdon to expand whereas you are hoping to expand Faringdon without having to provide any such transport infrastructure, employment, leisure facilities etc. This is not sustainable development.

Uffington and the Smaller Villages

In our response to both the February 2013 consultation on Local Plan Part 1 and the Housing Delivery Update we questioned whether Uffington should be reclassified as a Smaller Village rather than a Larger Village because of its unique proximity to the AONB and the very rural nature of the roads serving the village. There can be few residents in, and visitors to, the Vale of White Horse who would want to see Uffington developed in the same irresponsible manner as you have now proposed for most of the other Larger Villages and we repeat our request to allow it to be classed as a Smaller Village. You certainly have not demonstrated any regard for Areas of Outstanding Natural Beauty bearing in mind your proposed allocations on actual AONB land at Harwell.

We are disappointed that you are still not willing to give any information about the 1,900 houses still to be allocated in Part 2 of the Local Plan. Although you state that "development should be modest and proportionate in scale and primarily to meet local needs" in Smaller Villages, clearly if the Western Vale has to find room to accommodate 396 extra homes, then either our Larger

Villages are going to see even further housing or the Smaller Villages are going to be allocated housing which cannot be described as “modest and proportionate”.

Regarding your proposals for the Smaller Villages within the Vale, we refer you to our original comments in the response sent on your February 2013 consultation where we believe the detail needs to be firmed up. Our comments are even more important bearing in mind the increase in housing figures that you appear determined to adopt.

We agree with your policy for the villages not included within the settlement hierarchy categories, ie Bourton, that they are considered to form part of the open countryside where development will not be appropriate.

Density of Housing`

We object to the wording in your district wide policy relating to housing density being 30 dwellings per hectare as “a minimum unless local circumstances demonstrate this would have an adverse effect on character, highway safety or amenity of neighbours” and “higher densities are encouraged”. While this might be appropriate for larger settlements, it is not appropriate for the villages, including Larger Villages. Higher densities in urban locations may be appropriate however.

Coalescence of Villages

There needs to be a policy included in the Local Plan to prevent building on important areas of green space between villages to prevent coalescence, ie as in Shrivenham and Watchfield which is now only divided by a green strip of land which houses a golf course. There are other villages in the Vale which will see their borders expand as a result of your housing policies and they will also need this protection in the future.

Conclusion

The overall strategy needs considerable readjustment. It is significantly in breach of the requirements of the NPPF. It does not protect the environment, does not build healthy and sustainable communities, does not support sustainable transport and accessibility, and does not support economic prosperity (apart for those developments adjacent to “Science Vale”). The Vale needs to return to a strategy more in keeping with the two previous Local Plans which concluded that locating most of the new development in the settlements of Abingdon, Botley, Faringdon, Grove and Wantage and limiting it elsewhere was the most sustainable strategy. *“Focussing development in these locations, rather than spreading it more widely, would reduce the need to travel, enhance the vitality of the towns and protect the rural character of the Vale.”* None of the above has changed. Indeed the Oxfordshire Structure Plan to 2016 included a requirement for the larger urban areas to be the main focus for development.

If you cannot accommodate sufficient growth in the main settlements in the Vale with far more modest growth in the larger villages, you will need to re-visit the Garden City idea (which you have effectively pushed to one side by safeguarding the land for the reservoir) for the mid to later part of the Plan period. Indeed, if you do not adjust your housing growth figures, you will be obliged to do so as this area is close to the employment at Science Vale and is one of only two viable options. The alternative, bearing in mind the Vale is taking a disproportionately higher number of houses when compared with neighbouring councils in Oxfordshire, would be to ask them to share in some of the housing growth as they will reap the benefits of the employment opportunities. South Oxon’s Western border runs almost alongside the Science Vale area. It is worth mentioning that their demographic housing growth is higher than that in the Vale and they had a far worse track record in their 5 year housing land supply and yet they are being asked to provide far less housing. We share all of our services these days so surely it makes sense to share some of the planning pain in return for the economic gain. The Plan makes mention of exploring a southern bypass of Abingdon with South Oxfordshire District Council. NOW is the time to include this in the Plan in order to plan for

proportionate strategic growth in the Vale's principal settlement this side of 2031 and prevent building on the Green Belt north of Abingdon which is so controversial.

The most urgent item of business however is for the VWHDC to assess the numbers in the SHMA report in regard to "environmental constraints or issues related to congestion and local infrastructure" which are "very relevant issues in considering how much development can be sustainably accommodated and where new development should be located" (Government guidance quoted at Paragraph 4.11 on Pg 25 of the SHMA report.) Failure to do so will put you in breach of your statutory obligations. Your current draft Local Plan pays no regard to the interests of existing communities in the Vale or of its natural and historic heritage and will have disastrous consequences for the rural character of the Vale.

As a parish we fully endorse the representation submitted by the WVV today and wish the Hindhaugh Report, attached as Appendix 1, to form part of the evidence to the EIP. Bourton Parish Council, either as a member of the WVV Consortium, or as an individual parish wishes to be represented at the Examination in Public. We also wish to be notified of submission of the Plan to the Secretary of State, any recommendation resulting from independent examination and whether the Plan is adopted.

Yours faithfully

Maggie Brown
Clerk to Bourton Parish Council

Att Appendix 1 – Hindhaugh Report