

# **VALE OF WHITE HORSE LOCAL PLAN 2031**

## **(Part 1 Strategic Sites and Policies) EXAMINATION**

### **INTRODUCTION**

Sunningwell Parishioners Against Damage to the Environment (SPADE) is an established campaigning group, which for over a decade, has responded to strategic planning processes, at local, district, and county level, with, and on behalf of the residents of Sunningwell Parish. We work closely with the Sunningwell Parish Council which endorses the points we make in this submission. We believe in the permanence of the Green Belt. We accept the need for housing developments and infrastructure but believe that brown field sites should be used before green field and certainly before long established and valued Green Belt. We believe that local people should have a true voice in establishing planning policy and welcome the opportunity to contribute to the scrutiny of the Vale's Local Plan.

- SPADE has a fundamental objection to the 2-stage structure of the EIP as it fails to address limiting factors to the adoption of the Objectively Assessed Need (OAN) and the SHMA figures which is contrary to the National Planning Policy Framework (NPPF)
- The Council's Sustainability Assessment (SA), commissioned to underpin the Vale Local Plan (LP) fails to take proper account of the footnote to para. 14 of the NPPF. The SA asserts in paragraph 11.8.6 that the housing target was adopted because it meets the 'objectively assessed housing need in full, in accordance with national policy' without acknowledging the potential restrictions to that policy cited above. It fails to consider whether the Council should initially have tested the SHMA number against those restrictions, and only then applied the policy and criteria for excluding environmentally sensitive areas with rigor. The sustainability assessment therefore wrongly accepts the inroads into the Green Belt, AONB, the setting of Listed Buildings etc. as being sanctioned by the NPPF, when the opposite is the case
- We believe the SHMA numbers on which the housing requirement is based, are grossly overstated. The justification for developing substantial tracts of Green Belt in the Vale, given in the SA, appears to be that the Vale, faced with the numbers required by the SHMA contends that it has exhausted all alternatives and that it therefore meets the "very special circumstances" test in the NPPF. However, this approach is fundamentally flawed as the NPPF clearly states "unmet housing need... is unlikely to outweigh the harm to the green belt and other harm to constitute the very special circumstances justifying inappropriate development in the green belt." This lack of challenge of the SHMA has led to the Vale taking the easy option in order to build quickly, which can be more easily achieved on greenfield sites, rather than adopting the brownfield/previously developed land options first
- This situation is further compounded by the apparent fact that, as the Vale considers "exceptional circumstances" exist to justify the alterations to the Green Belt and AONB, the Inspector has requested a paper, to be received by 21<sup>st</sup> August, to clarify what in each case the Council considers the exceptional circumstances are
- The date given for receipt of the Vale response precludes participants in the EIP from assessing the contents of the Vale's "exceptional circumstances" justification in Stage 1 of the EIP at which time the SHLA / OAN will be examined. Delay in the availability of the Vale justification, coupled with the intended later assessment of its contents and green belt and AONB matters is considered unsound and prejudicial to the outcome

- SPADE contends that the result of the failure of process above, coupled with the intended structure of the EIP, where Core Policy 13 covering green belt is relegated to Stage 2, after the spatial strategy and strategic site selections are already approved by the Inspector, makes the EIP inadequate
- SPADE believes that Stage 1 of the EIP must cover not just Core Policy 13 but all aspects of Vale policy that have a direct bearing on the apparent blind acceptance of the SHMA figures
- In addition we understand that the Vale has failed to fully comply with the SEA regulations 2004 in that it failed to submit the SHMA to an adequate strategic environmental assessment and sustainability appraisal

## **Matter 4 – Unmet Housing Needs**

### **4.1 Is the approach to meeting within the District any housing needs which cannot be met elsewhere in Oxfordshire, as set out in policy CP2, soundly based and does it accord with national policy?**

- SPADE asserts that the recent visible efforts in the Oxfordshire Growth Board and in the case of the Vale, the Cabinet paper “Planning to Address Oxford housing need in the Vale of White Horse” is a belated attempt to try to evidence compliance with CP2
- Little actual progress has been made either when the Growth Board was operating in shadow form or since its formal creation. Its history shows cancelled meetings and a repeated failure to meet self-set deadlines. This does not auger well for demonstrating the duty to cooperate, never mind the actual delivery of an evidenced, sustainable and equitable plan to meet other councils’ unmet housing needs
- Identifying an equitable solution is not helped when the OAN is clearly overstated
- As outlined in the Introduction to this response, the fact that the City is still resisting updating its Local Plan figures and the Vale has therefore made arbitrary assessments on the quantum and potential share of Oxford’s unmet needs, demonstrates in our view that Policy CP2 is not soundly based
- We are aware that the Vale, along with South Oxfordshire and Cherwell district councils have voiced their concern that Oxford City has further land that could be used to meet its own need than is being made available<sup>1</sup>. Considering Oxford’s unmet housing need specifically, it appears that the City Council is allocating an excess of limited land for employment purposes when a modest reduction in this allocation could be re-designated for residential purposes. This has the effect of reducing both the demand and the overall requirements for housing which are required to be met in other Districts

In conclusion to this question, much is made by Oxford City Council of the need to protect the lungs of the city and to maintain the visual impact on historic Oxford as a justification for relocating some of its housing development into the surrounding Districts<sup>2</sup>. However, the report has little to say about protecting the green lungs and visual impact on its historic neighbours such as Abingdon and its surrounding green belt villages

<sup>1</sup> (Oxford’s Housing Land Availability and Unmet Housing Need, Oct 2014).

<sup>2</sup> as cited in Potential to Accommodate Urban Extensions in Oxford’s Green Belt (produced by Oxford City Council)

**4.3 Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?**

We believe that this is inevitable. The Vale already propose 1000 houses in North Abingdon, and the Vale considers that due to the scale of building required, “exceptional circumstances” exist to justify the alterations to the Green Belt. It follows that any or all of the further 3000 houses identified in the Vale Cabinet Paper to meet Oxford's needs could be proposed and delivered in a green belt location using the same justification. Currently the Vale's Cabinet paper shows the Abingdon and Oxford Fringe sub area as providing “good opportunities to address unmet need.” Clearly this points towards a major urban extension to Abingdon which would require a significant revision to a range of Local Plan policies.

Examples include the Green Belt boundaries which in the current plan are cited by the Vale as being appropriate to endure throughout and beyond the plan period. In addition, the existing transport and infrastructure assessments associated with the Local Plan show that currently the A34 is operating at capacity. The addition of 1000 houses in north Abingdon, and 510 in Radley and Kennington will further stress this situation, even with the potential Park and Ride facilities (which we do not accept as there is no clear evidence of the need for a Green Belt location for this facility) proposed in the OCC Local Transport Plan. The further addition of up to 3000 houses (which we do not accept as there is no clear justification for a green belt location) clearly make use of the A34, untenable. As a result Core policy 7 will require reconsideration.

If such a significant volume of housing were required to be met in the Abingdon and Oxford fringe sub area it would also potentially lead to speculative proposals by third parties of a Garden City style approach based on the alleged sustainable transportation options offered by the County Council remote Park and Ride proposals which could consequently affect the Vale's own proposals. Clearly this approach would be vigorously opposed by significant parts of the local communities.