

## Comment

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**Event Name** LPP2 Publicity Period Oct - Nov 2017  
**Comment by** Mr Fergus Cable-Alexander  
**Comment ID** 123  
**Response Date** 18/11/17 16:12  
**Status** Submitted  
**Submission Type** Web  
**Version** 0.1

**Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.** 4a and 8a

**Q2 Do you consider the Local Plan is Legally Compliant?** No

**Q3 Do you consider the Local Plan is Sound?** No

**Q4 Do you consider the Local Plan complies with the Duty to Cooperate?** No

**Q5 Please provide 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 cooperate, please also use this box to set out your comments.**

Having assisted with the preparation of Fyfield and Tubney Parish Council's objection to the inclusion of site KBAG\_ A ('the Fyfield site') in the additional allocations in Policy 4a, I fully endorse the points made in that objection.

The concepts underlying the criterion of **positive planning** are opaque to the layman (as is much of the jargon in the prolific verbiage underlying the plan). However an allocation based on the airbrushing of Fyfield and Tubney (the community most adversely affected by the proposal) from the discussion of the site, the resulting failure to consider the damaging impacts of the proposal on the villages and

their conservation areas, the biased and distorted 'evidence base' and the insultingly inadequate process of consultation of the Parish Council represents the opposite of any concept of positivity.

Moreover development of the Fyfield site flies in the face of **national planning policy** as set out in the NPPF with its emphasis on **sustainability**. There is nothing sustainable about building a car-dependent, urban commuter dormitory, without coherent links to the communities on either side of it or a strong central core of its own, on good farm land in open countryside in an important landscape feature of the Vale. There is nothing sustainable about a housing estate remote from accessible jobs sending several hundred extra cars out in peak times onto an already over-congested main road. Anyone living in this proposed development and wishing to work in Oxford or the surrounding areas, will add to the already horrendous traffic conditions each and every working morning on all approaches to the A34. Any significant housing developments, without improvements to infrastructure on the Oxford ring road and its key junctions will bring the city traffic to a grinding halt and seriously harm economic growth.

There is nothing sustainable about proposing to bring the noise, light and traffic pollution of a new roundabout to within 200 metres of Fyfield and its conservation area without even suggesting what mitigation measures will be needed. In short, there is nothing sustainable about building the wrong houses in the wrong place – which is what this development offers.

Incidentally, there was nothing sustainable (in a rather different sense) about the earlier pretence that the Fyfield site would make a substantial contribution to meeting Oxford's alleged needs, so it has been quietly dropped from the list of sites close to and accessible to Oxford, leaving the District Council ('DC') in a complete muddle about what purpose they think the development would serve. See my separate comment on Paras 2.8, 2.16 and 2.37.

The allocation fails the test of **justification**. The DC had clearly identified the site as a preferred, rather than a possible, option long before it came to the attention of the community affected by it. As a result the 'evidence base' is demonstrably biased and flawed. The PC's objection provides an analysis of two parts of the evidence base to show the flaws and bias in them; and a separate study calls into question the accuracy of the traffic studies. With more time and resource, other examples could have been given. The overwhelming impression of the evidence base is that the district council's staff has worked with their advisors to show that the Fyfield site is a front runner, rather than to establish whether it should be a candidate.

Moreover, recent proposals for changes in planning methodology suggest that the purported justification for including the site – the quantum of housing needed according to the strategic housing market assessment – is open to challenge.

There are also important doubts about **effectiveness**. The PC's objection demonstrates the economic non-viability of the site – even before taking into account the expenditure, hitherto ignored, that will be needed to mitigate the harm to Fyfield and its conservation area. That is vindicated by the recent indication by the developer in their scoping analysis that they are likely to seek approval for even more houses than previously proposed.

As a separate issue under effectiveness, I believe that monitoring concerned only to make sure that houses keep up with forecast economic growth, without a braking mechanism if the growth does not materialise, represents a real threat of blighting the rural Vale with half completed building sites constituting grim eyesores for years to come.

**The inclusion of the Fyfield site in the allocations for housing in the Local Plan part 2 is UNSOUND according to every criterion of soundness set out in NPPF.**

**Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.**

Remove the Fyfield site from the Additional Allocations in Policy 4a (and Policy 8a)

**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.**

**Q6 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

**Would you like to hear from us in the future?**

- . I would like to be kept informed about the progress of the Local Plan
- . I would like to be added to the database to receive general planning updates