



**Vale
of White Horse**
District Council

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	Prof.	
First Name	John	
Last Name	Cobb	
Job Title (where relevant)		
Organisation representing (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

Part B – Please use a separate sheet for each representation

Name or organisation: J. H. Cobb

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

Paragraph

2.45,
2.46

Policy

4a, 8a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

No

4. (3) Compiles with the Duty to Cooperate

Yes

Yes

No

5. 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 Cooperate. 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.

I wish to **object** to the inclusion of

Land East of Kingston Bagpuize *aka* KBAG_A (Fyfield site)

in **Core policy 8a: Additional site allocations for Abingdon-on-Thames and Oxford Fringe Sub-area** with specific reference to Paragraphs **2.45** and **2.46** of Local Plan Part 2031, Part 2, *Detailed Policies and Additional Sites*.

My objection is not limited to the paragraphs referred to above and applies to the whole of the Fyfield site selection process. In summary:

The plan is **unsound** because it is **not justified** by **evidence** of a need which is **proportionate** to the overwhelming effect it would have on the villages of Fyfield, and Kingston Bagpuize and Southmoor.

The inclusion of the Fyfield site in the plan is **unsound** because the site is patently **not sustainable** within the terms as defined in the National Planning Policy Framework (NPPF).

Continued on page 4

6. 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.

1. To recognise that building on a green-field site is not sustainable;
2. To recognise that it is not sustainable to site *urban* developments in *rural* areas to the detriment of the local communities;
3. To recognise that it is not sustainable to create isolated commuter dormitories distant from places of employment;
4. To recognise the negative environmental impacts that such dormitory settlements would have, including an unnecessary increase in greenhouse gas emissions, and
5. **To remove the Fyfield site from the list of LPP2 allocations.**

(Continue on page 4 /expand box if necessary)

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

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:

The affirmative answer to question 7 above should be taken to mean that I wish that my views are presented orally to the inspector either by myself or by my representative, or by a joint representative.

Please note that I cannot actually sign the box below in an electronic submission.

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

Signature:

J.H. Cobb

Date:

19 Nov 2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

 Yes

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

This page, and the following pages, are a continuation of my response to question 4 (page 2 above):

I wish to **object** to the inclusion of

Land East of Kingston Bagpuize aka KBAG_A (Fyfield site)

Core policy 8a: Additional site allocations for Abingdon-on-Thames and Oxford Fringe

Sub-area with specific reference to Paragraphs 2.45 and 2.46 of Local Plan Part 2031, Part 2, *Detailed Policies and Additional Sites*.

My objection is not limited to the paragraphs referred to above and applies **to the whole of the Fyfield site selection process**. In summary:

The plan is **unsound** because it is **not justified by evidence** of a need which is **proportionate** to the **overwhelming effect** it would have on the villages of Fyfield, and Kingston Bagpuize and Southmoor.

The inclusion of the Fyfield site in the plan is **unsound** because the site is **patently not sustainable** within the terms as defined in the **National Planning Policy Framework (NPPF)**.

1 Not justified

In LPP2 (para 2.10) the VOWH gives the total requirement of 24,160 of houses by 2031. This is the sum of (a) 20,560 as being an 'objectively assessed need', (b) 2,200 as the quantum of Oxford's unmet housing need and, (c) 1,400 additional homes. It is therefore planning for a surplus of nearly six percent.

The figure of 20,560 is quoted with an implied precision of 10 parts in twenty thousand, i.e. approximately 0.05 %. It is scarcely credible that that figure for need can be estimated to that precision because it is based, via the SHMA, on assumptions of economic growth. No economist is that good. Change the assumptions, and the estimate will change. Change the model relating housing need to economic growth and the estimate will change. No model is that good. It is well-known in the hard sciences that a result is only as good as the error margin on it. No error on the figure of 20,560 is given. In fact the new methodology proposed in a recent Government consultation paper on estimating housing demand would suggest that thirty percent fewer houses would be required. The uncertainty (margin of error) on the figure of 20,560 must, therefore, be of the order of thirty percent.

The second figure, of 2,200 homes to satisfy Oxford's unmet housing need is based only on a 'working assumption' (LPP2, para 1.17). It is nowhere explained how this figure was arrived at, or the basis of the working assumption. The uncertainty on this figure, again, must be at least thirty percent.

The surplus of 1,400 'additional' homes represents an ambition (LPP2, para 2.33), rather than a quantified, justified, need. It is just a wish for more development in the Science Vale. Planning for a surplus which may never be used is unsound.

A more realistic figure for the essential housing allocation would be seventy percent of $(20,560 + 2,200) = 15,932$, or 16,000 in round numbers.

However, the VOWH's Local Plan has also completely ignored the effect of Brexit. Whether hard or soft, Brexit would undoubtedly reduce the housing requirement in the Vale (and Oxford). There would certainly be less inward EU investment in Science Vale – many hi-tech science projects, especially on the Harwell campus, are partially supported by EU funding. EU nationals I know who are working in Science Vale and Oxford are already talking of returning to the EU; the reported exodus of EU nationals working in the NHS is a further demonstration that, because of Brexit, the future need for housing is likely to be less rather than more. Allowing for Brexit, the figure may be even lower than 16,000.

The total assumed 'need' of 24,160 therefore represents a surplus of fifty percent over the more likely true figure. Part of this surplus consists of the Additional Allocations of LPP2 (unnumbered tables on page 27) of 3,420 houses. The original allocation of 20,560 would still represent a substantial surplus (twenty five percent) over the likely true need, including Oxford's unmet housing need. On numerical grounds, there is little, if any, justification for the Additional Allocations, and none whatsoever for including the Fyfield site in LPP2.

The Fyfield site was not included in Part 1 of the Local Plan. Initially it seemed to be included in LPP2 as meeting Oxford's unmet housing need but subsequently rejected by the Oxfordshire Growth Board as unsuitable because of its distance (from Oxford) and lack of adequate public transport (to Oxford). It is no longer promoted in LPP2 (Table 2.1) as contributing to the quantum of Oxford's unmet housing need, even though it is promoted (LPP2 para 2.45) as having 'excellent public transport connectivity to Oxford and Swindon' [*but nowhere else*].

Given that the VOWH's claimed need for 24,160 houses already includes a six percent surplus, given that the assessed need is based on the contestable SHMA, given that a more realistic figure is likely to be considerably lower, and that the original allocation of 20,560 would represent a surplus of twenty five percent over a realistic figure, and given that that need will certainly be reduced by Brexit, there is no justification at all for any of the Additional Allocations of LPP2, and certainly no justification for

the inclusion of the Fyfield site in LPP2. It is simply makeweight, offered to the VOWH by a speculative landowner and which the VOWH DC has attempted to justify *post-hoc*.

No evidence, proportionate to the environmental damage that the construction of an unsustainable *urban* [VOWH's adjective] settlement of six hundred houses would do to the communities of Fyfield and Tubney, and Kingston Bagpuize and Southmoor, and the wider environment, has been presented by the DC to justify its inclusion in LPP2.

The inclusion of the Fyfield site in LPP2 is not sound because it is not objectively assessed and this part of the plan is therefore not positively prepared.

The inclusion of the Fyfield site in LPP2 is **not sound** because it is **not justified by any proportionate evidence**.

2 Not consistent with NPPF

The National Planning Policy Framework (NPPF) is about achieving sustainable development. The Ministerial foreword to NPPF says '**sustainable** development is about positive growth – making economic, environmental and social progress for this **and future generations**'. It is **not simply about growth**. Progress for future generations implies conserving and improving the current environment.

A core planning principle of the NPPF (para 17) is [to] 'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'.

Section 3 of the NPPF 'Supporting a prosperous rural economy', (para 28 ff) states 'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should support sustainable growth which respect the character of the countryside...'

Appendix A of the VOWH LPP2 (page 18) promotes the Fyfield site as an *urban* extension of Kingston Bagpuize, and goes on to discuss *urban* design principles. The proposed Fyfield site is a *green field site* in open, relatively unspoilt countryside, a *rural* location. The development of 600 homes would be built in on land situated roughly in a triangle between three main roads, loosely connected at its apex to the village of Kingston Bagpuize (KBS). There are few jobs locally; the main areas of employment are Science Vale and Oxford, at least ten miles away. It would become a dormitory settlement of car-based commuters with little or no connection to KBS or Fyfield. Its development would be entirely contrary to the principles of the NPPF.

The proposal for the development of the Fyfield site **does not respect the character of the countryside**; it does **not recognise the intrinsic character and beauty of the countryside**; it **does not support thriving local economies** – all employment is too far away, and, as addressed further below, **is not sustainable**.

The proposal of the Fyfield site in LPP2 is unsound because it is not consistent with national policy.

3 Not Sustainable

The last, but **not least**, of the three key pillars of sustainable development of the NPPF (para 7) is that positive planning plays an '*environmental role – contributing to **protecting and enhancing our natural, built and historic environment**; and, as part of this, helping to **improve biodiversity, use***

natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.'

Section 4 of the NPPF 'Promoting Sustainable Transport', (para 29) states: '**Transport policies** have an important role to play in facilitating sustainable development but also in contributing to **wider sustainability and health** objectives....'. Paragraph 30 states 'Encouragement should be given to solutions which **support reductions in greenhouse gas emissions and reduce congestion**. In preparing Local Plans, local planning authorities should therefore support a pattern of development which ... **facilitates the use of sustainable modes of transport.'**

Strategic Objective of the VOWH LLP1 (SO 8) is [to] '**Reduce the need to travel and promote sustainable modes of transport.'**

The Fyfield site is located a long way (typically ten miles) from any major centre of employment. There is some public transport to Oxford and Swindon, but to nowhere else. In particular there is no effective public transport to Science Vale or the Harwell area. None of the centres of employment are in safe walking or cycling distance. Although there is some public transport to Oxford, commuters would use their cars to go to work, to major retail centres in Oxford and Abingdon, and for any other reason for travel (e.g. to visit GPs). Its isolated situation **would not reduce the need to travel**, in direct contradiction of SO 8 of LPP1 and the NPPF.

The additional traffic – roughly 5000 journeys per day – associated with a site of 600 houses would add to the already severe problems of **congestion** on the A420 and A415. This is well documented in a separate objection by Fyfield and Tubney Parish Council which I urge the Inspector to read carefully. It was also raised as a concern in Oxfordshire County Council's response to the consultation phase of LPP2 which stated: '*Traffic impact on junctions requires thorough assessment including A420/A415, A420/A417, A417/A338... Botley interchange*'.

Locating such a development at Fyfield is in contradiction of the NPPF criteria of sustainability.

Car-based lifestyles are unhealthy. The reliance on the car as a primary means of transport for the occupiers of the Fyfield site would **not** [support] '**wider ... health objectives...**'. (NPPF, para 29). To state the obvious, walking or cycling to work is healthier than driving to work.

From the point of view of reducing the need to travel, reducing congestion and promoting a healthy lifestyle, the Fyfield site is not sustainable.

The NPPF (para 95) states 'to support the move to a low carbon future, local planning authorities should: plan for new development in locations and ways **which reduce greenhouse gas emissions...**'

The policies in VOWH LPP1 and LPP2 to minimise and mitigate greenhouse gas emissions are **lamentably weak**. More attention is given to mitigating the *effects* of climate change – the stable door is shut after the horse has bolted. However, the stated Strategic Objective 12 (SO 12) of the VOWH LPP1 is [to] '**Minimise greenhouse gas emissions** and other pollution....'

Development of a site, such as the Fyfield site, reliant on the use of motor cars contradicts the goals of both the NPPF and SO 12 to minimise greenhouse emissions. The most recent figures (2015) available from Government statistics (www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics) show that in VOWH 46 percent (417.9 tons in a total 901.1 tons) of CO2 emissions are due to transport. These same statistics also show that 96 percent of these emissions are under the influence of the local authority, i.e. VOWH. The average per-capita atmospheric CO2 burden in VOWH is 3.3 tons per annum. A very simple calculation, based on 4.75 trips per day per dwelling – characteristic of an isolated development – with two people per

dwelling, average motor vehicle emissions (0.125 kg/mile) and an *excess* distance per trip of five miles compared with a site closer to employment and facilities, indicates an extra CO2 burden of 0.46 tons per capita per annum. In other words, someone living on the remote Fyfield site would be responsible for a CO2 emission associated with transport some 14 percent (0.46/3.3) above the average in the VOWH. By contrast, the 2015 per capita CO2 emission associated with transport in Oxford City is only 0.933 tons. Whilst the numbers are an example, the point is that **situating housing in an isolated settlement**, such as the Fyfield site **does nothing to reduce CO2 emissions**; on the contrary **it would increase** them – a step in the wrong direction, contrary to the NPPF and the spirit of SO 12. (It should be noted that the use of low-emission, such as electric, vehicles, would simply shift the problem elsewhere unless a substantial fraction of UK energy came from renewables or nuclear generation. Even then, the reduction is likely to be less than fifty percent, and will not have happened by 2031.)

From the point of view of **reducing greenhouse gas emissions**, the Fyfield site is **not sustainable** with respect to NPPF paragraph 95. Any claim made in LPP2 that it is, is misleading or disingenuous.

The proposed development at Fyfield would be built on a *green-field* site. The land is grade 2 agricultural land – which does *not* mean that it is poor agricultural land. It is currently used for arable farming; it is not waste land. Much – approximately fifty percent – of the food consumed in the UK is imported, itself an unsustainable activity, not least because of the CO2 generated by ‘food miles’. It is quite likely that a greater fraction of UK food will soon have to be produced in the UK. Farm land is a **resource for current and future generations**. Building on productive farmland is **not a prudent use of natural resources**; it is **unsustainable** because it would **compromise the ability of future generations to meet their own needs**. In other words it is **not consistent with the NPPF**.

The NPPF states (para 109) [that] ‘The planning system should contribute to and enhance the natural and local environment by... recognising the wider benefits of ecosystem services; minimising impacts on biodiversity ... contributing to the Government’s commitment to **halt the overall decline in biodiversity**, including by establishing coherent ecological networks that are more resilient to current and future pressures’.

Strategic Objective 10 (SO 10) of VOWH LPP1 is [to] ‘Maintain and improve the natural environment including biodiversity, landscape, Green Infrastructure and waterways.’

Core Policy 45 of LPP1 (Green Infrastructure) states: ‘A net gain in Green Infrastructure, including biodiversity, will be sought either through on-site provision or off-site contributions and the targeted use of other funding sources. **A net loss** of Green Infrastructure, **including biodiversity**, through development proposals, **will be resisted**.’

The Fyfield site currently supports a biodiversity characteristic of its nature as arable farmland. According to DEFRA the number of farmland birds declined by over fifty percent between 1970 and 2015. The site supports populations of Lapwings, Skylarks and Corn Buntings, all red-listed by the RSPB (the official DEFRA reference). All are threatened by loss of suitable habitat, i.e. open farmland. Other species of conservation concern are also present on, or within 1km, of the site, including Slow Worm, Grass Snake and Brown Hare. The six listed species are all priority species in the UK Biodiversity Action Plan (BAP) used to inform DEFRA’s Joint Nature Conservation Committee. (Note that the preceding list of six species is illustrative, not exhaustive.) Whilst the ‘Biodiversity and Green Infrastructure’ paragraph of page 20 of Appendix A of LPP2 makes the necessary nods to biodiversity (how could it do otherwise?) it **fails to recognise** that building on the site would **destroy a valuable habitat for threatened species** and would therefore put them under further pressure; it **does not demonstrate**, apart from some motherhood-and-apple-pie words, that a net gain in biodiversity would be achieved (albeit at the expense of species under pressure) or **how that would be sustainably maintained for future generations**. The VOWH policy of Biodiversity Offsetting is, in any case, suspect. Pilot studies

conducted for DEFRA (WC 1051 Final report, 2012) have not unambiguously demonstrated any net benefit to biodiversity.

The open farmland of the Fyfield site is not only a valuable habitat per se for vulnerable species, it also forms part of the natural green infrastructure and serves as part of a corridor for migrating species. Consideration is given to the SSSI sites at Frilford Heath and Appleton Lower Common, but the National Nature Reserve at Chimney Meadows (SP363008), which is within 5km of the site, is **conspicuously absent** from any discussion of environmental pressure, possibly because it is in West Oxfordshire.

It has **not been demonstrated** by VOWH that developing the Fyfield site would contribute to a gain in biodiversity; it would lead to further pressure on threatened species and remove an existing part of the green infrastructure. Development of the Fyfield site with potential loss of habitat is **not consistent with VOWH SO 10 or the NPPF and is unsustainable.**

The NPPF (para 125) states 'By encouraging good design, planning policies and decisions should **limit the impact of light pollution from artificial light** on local amenity, intrinsically dark landscapes and nature conservation.'

The landscape at Fyfield is intrinsically dark; it is still possible easily to see the moons of Jupiter and count many stars in Orion. The site development template for the Fyfield site (page 19 of Appendix A of LPP2) proposes access to the proposed new site via two new roundabouts. These roundabouts would have associated lighting and the consequent light pollution which would spill into Fyfield with (at least) two consequences. The first is the **detrimental effect light pollution would have on the health** of residents of properties within a few hundred metres of the roundabouts (and on any the residents of the development) by sleep disturbance.

The second consequence is that **the skies would no longer be dark.** A recent (2016) satellite map (<https://www.cpre.org.uk/media-centre/latest-news-releases/item/4314-new-interactive-maps-reveal-england-s-darkest-and-most-light-polluted-skies>) of the darkness of the night sky shows three things. The first is that in much of the UK the skies are not dark, the second is that Fyfield is in one of the darkest parts of Oxfordshire, and the third is that (by looking in the region of the A420/A338 junction) that the spillage of light from an illuminated roundabout extends up to 1km in any direction. Fyfield would lie in the light spillage area of the proposed two new roundabouts. Within that area the background to the stars in the night sky would be eight to sixteen times brighter. Many fewer stars would be visible.

Dark skies are **part of the natural environment** which, according to the third – environmental – pillar of the NPPF (para 7) definition of sustainability, **should be protected.** Wonderment at a starry night sky has initiated the careers of many scientists but there is now serious concern about the ability to attract school leavers to follow STEM careers. In fact dark skies are part of the **natural heritage to preserve for future generations** so that they have the same sense of wonderment and eventually contribute to a future economy – such as in Science Vale.

No mitigation of the pernicious effects of light pollution at this site is presented in LPP2.

In summary:

The inclusion of the Fyfield site in LPP2 is **unsound** because:

- 1) **it is not positively prepared and is not consistent with sustainable development;**
- 2) **it is not justified by proportionate evidence, and**
- 3) **it is not consistent with national policy as set out in the NPPF.**

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Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk