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19 December 2014

Mr D Buckle  
CEO  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon-On-Thames  
OX14 3JE



Dear Mr Buckle

**Re: Local Plan 2031 Part 1 Consultation**

I wish to raise my objections to the facilities that the Council has provided to enable residents to comment on the above Plan.

As part of your earlier consultation I used the consultation website and found the whole experience extremely user-unfriendly, unnecessarily time-consuming and found that it did not provide me with the flexibility to comment on the Plan as I wished as a resident. This has not changed. In addition the Council has now provided a form to be used to comment on the Plan, which again is not user-friendly but purely designed to make the Council's life as easy as possible. According to your website there is no other mechanism through which to comment which is totally unacceptable.

I am therefore retaining my rights as a citizen to write to you with my concerns about the Local Plan 2031 as I find the mechanisms that you have provided inaccessible.

**Housing Quantum**

The whole premise of the Vale's Local Plan is based on the need for a total of 20,560 homes to be built by 2031. This is not based on robust or sound evidence and therefore the whole Plan is totally flawed and unacceptable. According to the 2011 prediction for housing there was a need for 388 houses to be built per annum in the Vale. This has been uplifted by an extraordinary 165% by the Vale in the Strategic Housing Market Assessment (SHMA) and this is the basis for the whole Local Plan.

The SHMA figure of 1025 houses per annum is apparently based on the fact that there is an above average proportion of detached, 4+ bedroom houses or those in Council Tax Band E or above in the Vale region. This purely exemplifies the Council's historic mis-management of planning applications allowing numerous such houses to be built instead of focussing on the needs of the majority of the population. The development of the old College site at Boars Hill is a prime example. The "backlog" of housing needs is also a direct result of the Council's mis-management of planning. Furthermore, the figure provided by the SHMA appears to have little evidence base and is aimed at providing all housing needs to avoid any households relying on financial support for housing. This is totally unrealistic and I cannot believe that since the welfare system started that there has ever been a time where some households have not required financial assistance.

The Council had a number of options regarding the calculation of the quantum of housing required over the period of the Local Plan. Despite this the whole Plan has been based on the SHMA figure without explaining to residents within the Plan that other options were available. I have found no evidence as to why, for example, the Council did not use the figure set out in the South East Plan

which was 13,294 compared to 20,560, representing an increase of over 50% or 7,266 houses. I realise that the South East Plan was abolished but this was purely to pass responsibility to local authorities.

I therefore refute the grounds on which the Council has calculated the number of houses required and find it to be over-exaggerated without any evidence to support it.

### **Overall Pattern of Development**

In the Sustainability Assessment, the Council has decided that development should be focussed on areas “within existing towns and villages”, as “extensions to the edges of main settlements” and as “extensions to the edge of villages”. No evidence has been provided as to why this decision has been reached or why there is no mention of the numbers of empty properties in the region and how the Council is going to address this as part of the overall housing need. I am extremely concerned about the environmental impact that the strategic focus on extending existing villages will have, particularly since Core Policy 3 below has no clear basis.

### **Core Policy 3 – Settlement Hierarchy**

There is no evidence within the plan to explain how you have reached your classification of the settlement hierarchies and I would challenge the basis on which this has been founded as completely lacking any robust measure. How, for example, can you include both Botley and Uffington as “Local Service Centres” when the latter is a small rural village in an important historic environmental setting with few amenities? Furthermore, Cumnor has been included as a “Larger Village” on the basis that it has “a more limited range of employment, services and facilities”: it has 2 pubs, 1 shop (threatened with potential closure) and 1 primary school and thus virtually no employment opportunities and very limited services.

### **Core Policy 4 – Meeting our Housing Needs**

As the Local Plan is based on the SHMA, which is totally unsubstantiated, there are no grounds for the housing figures contained in this policy. There is a “presumption in favour of sustainable development within the existing built area of Market Towns, Local Service Centres and Larger Villages” but many of your proposals are actually on the outskirts of these areas, not within existing built areas and represent significant increases in the overall footprint of the settlements in some cases, e.g. Faringdon, Shrivenham. Development in smaller villages will apparently be based according to future Neighbourhood Development Plans or future parts of the Local Plan which will threaten any protection of the character of existing villages. This is likely to include infill development and loss of Green Belt sites, ruining village settings and countryside amenities for local residents. There has already been a significant infill development in the centre of Appleton’s Conservation Area and therefore the precedence has already been set as the Council has already shown itself to ignore existing protection measures.

### **Core Policy 5 – Housing Supply Ring-Fence**

This policy is based on CP4 and the housing figures in the SHMA and therefore has no robust evidence to substantiate the numbers of houses. Furthermore a significant proportion of the houses relating to this policy are on or adjoining an Area of Outstanding Natural Beauty which is totally unacceptable.

### **Core Policy 6 and 16**

The Council has identified 129 hectares on an Area of Outstanding Natural Beauty for business development needs in CP6. There is no justification for this or any evidence to support the requirement for such a development. Oxfordshire is renowned for its low unemployment figures and I would question how the Council has reached its calculations to develop 219 hectares for meeting business and employment needs. Furthermore, why are only 29 of the 47 hectares being earmarked for use at the site at Didcot Power Station?

### **Core Policy 7 – Providing Supporting Infrastructure and Services**

According to this policy developers will be required to ensure the delivery of infrastructure requirements. The Council has not stipulated where these sites are to be situated (as not all will be available as on-site facilities) and many will therefore require further loss of Green Belt land. There is

already heavy pressure on local schools and GP surgeries coupled with ongoing planned spending cuts in the public sector. Therefore the Council may require developers to build certain infrastructure but the future costs will all sit with the Council in the long term which, in the current financial climate, is not, and will be not, financially viable for some time. The Plan provides no evidence as to how this infrastructure will be supported long term.

#### **Core Policy 8, 15 and 20 – Spatial Strategy for the 3 Sub-areas**

According to CP8 there is a requirement of 5,438 houses to be built during the full plan period in the Abingdon-on-Thames and Oxford Fringe sub-area of which 3,933 have sites allocated. This leaves 1,505 houses with development sites needed to be allocated in the future. However CP8 states that a further 1,696 houses still need to be identified representing an additional 191 houses to the stated requirement.

According to CP15 there is a requirement of 12,450 houses to be built during the full plan period in the South East Vale sub-area all of which have sites allocated. This leaves no houses with development sites needed to be allocated in the future. However CP15 states that a further 200 houses still need to be identified representing an additional 200 houses to the stated requirement.

According to CP20 there is a requirement of 3,173 houses to be built during the full plan period in the Western Vale sub-area all of which have sites allocated.

The total number of required houses to be built according to these 3 Core Policies amounts to 21,452, which is higher than the SHMA figure of 20,560. This is not substantiated or anywhere explained in the Plan.

#### **Core Policy 11- Botley Central Area**

There is no evidence to support a need for the redevelopment of the Botley Central Area as identified here despite the claims of the recent Retail Study commissioned by the Vale. Botley already has 3 major retail foodstores, plus an Aldi supermarket and a forthcoming Waitrose store just down the Botley Road. Furthermore, current consumer shopping patterns have moved away from the superstore to more local and smaller convenience stores, as exemplified by the substantial investment being made by the major retailers. The Retail Study highlights the car park areas as being suitable for re-development but these are already heavily used and often full. There is already considerable office space which has been sitting empty for years and there is no evidence of need for a hotel. I am also extremely concerned that the area marked for re-development includes the existing housing for the elderly – there are absolutely no grounds for destroying the homes of the elderly and vulnerable and I recently met one resident, who is blind, who is extremely concerned about losing the home he is familiar with.

#### **Core Policy 13 – The Oxford Green Belt**

The whole premise for the removal of areas of Green Belt in the Vale region is based on the Council's Green Belt Review, which, considering its significance should be consulted upon and should not be taken as acceptable by the Council. Furthermore it is contrary to the NPPF which is strongly in favour of Green Belt land and avoiding development on such areas.

Despite this, the Council has identified 85.89 hectares of Green Belt land accommodating the development of 1,510 new homes, not including any additional Green Belt land needed for infrastructure development. In addition to this, 80.67 hectares of an Area of Outstanding Natural Beauty (AONB) has been identified for development to accommodate 1,400 new homes. This in addition to the 129 hectares of AONB land identified for business development.

This amounts to a total loss of nearly 300 hectares of countryside for redevelopment, is completely unfounded and totally unacceptable. The figure will be much higher once infrastructure has been included.

Specific site concerns which I have include (although not exhaustive): (a) the area to the South of Kennington being allocated for development adjoins a local wildlife site and actually blocks any

potential corridor for wildlife to Green Belt areas; (b) the area extending Sutton Courtney adjoins Ancient Woodland, which is a rare and special habitat type in the UK, and should not be disturbed by development directly adjoining it (both in terms of the actual build of properties and the final resulting development); and (c) the 1,500 homes at Wantage will directly adjoin the AONB.

### **Green Belt Review**

The Green Belt Review Phase 2 identified 25 sites edge of settlement areas as potential exclusion from the Green Belt plus a further new inset settlement in Farmoor. I have already objected to the fact that the Green Belt Review has not been consulted upon and now we are presented with Phase 3. This has not been included in the Local Plan but identifies further significant proportions of land to be excluded from Green Belt designation and which no doubt will be included in Neighbourhood Development Plans and future parts of the Local Plan as development sites.

According to CP4 development should be “within existing built areas” or, in smaller villages, “limited infill development may be appropriate with the existing built areas of these settlements...” However the policy provides the caveat of other development being allowed in the future which is not within the existing built area of villages, thereby expanding the size of villages and changing their existing character. In the Green Belt Review Phase 3 parcels of land for exclusion from the Green Belt (and therefore open for development) include Appleton, Cumnor, Farmoor, Kennington, Radley, Wootton. I am particularly concerned about the threat this poses to the community feel and character of Appleton, Cumnor and Farmoor, none of which are substantial sized settlements at present.

I object to the underhand way in which the Council has presented residents with a Local Plan when it knows full well that, in accordance with its Green Belt Review Phases, that further extensive areas of Green Belt land will be lost in the region by the provision of a caveat in CP4. Furthermore many more villages have been identified as strategic sites on the Adopted Policy Maps, some of which are characterful in nature, e.g. Kingston Lisle, none of which are mentioned in the Local Plan. I therefore believe that there is a very realistic risk to the countryside and settings of many Vale villages through the Council's lack of openness about what is really going to happen in the future.

### **Core Policy 14 – Upper Thames Reservoir**

I am yet to see any evidence for a need in Oxfordshire for a huge reservoir to be built, ruining a further area of countryside. I still believe that this is to meet the needs of the wider South East region and therefore there is no requirement for a reservoir to be built on this site or even in Oxfordshire.

### **Core Policy 24 – Affordable Housing**

It is not clear from this policy where any off-site provision for affordable housing will be allocated and whether this is already included in the site allocations detailed in the Plan. I would also question how the Council is going to ensure that 35% of housing built is affordable, considering that this is not a profitable option for developers, nor how the Council will ensure that affordable housing is actually bought by the people who need it and not as second homes for investment purposes or for commuters. The Council has such a poor track record in ensuring the building of affordable housing, as exemplified by the above average proportion of homes only afforded by the more wealthy members of our population, and offers no evidence of how this target will be realistically attained.

I would also urge the Council to join forces with other Oxfordshire Councils to lobby Government to have a similar higher living allowance allocated to public sector workers (as in London and Outer London Area) considering the relative high cost of living in the region.

### **Core Policy 25 – Rural Exception Sites**

Considering the points above, my concerns about getting developers to actually build affordable homes and the fact that the Council has not stipulated in the Plan where off-site affordable housing will be built I believe that there is a real threat to rural sites under this policy and therefore further threats to the countryside in region. This policy also threatens development in villages, regardless of settlement size, posing further potential damage to the character of Vale villages.

**Conclusion**

In summary, I object to the Plan on the basis that that it has not been positively prepared, is not justified and is not based on robust and credible evidence, in particular the quantum and location of development and the extensive loss of countryside it represents to the region. The loss of countryside is of particular concern especially when the Local Plan does not highlight to residents the considerable impact highlighted in the Green Belt Review Phases. I believe that the Council has a duty to consult on a matter of such considerable significance and needs to completely review its calculation of housing requirements.

Yours sincerely

Karen Rhodes

**cc.**

VOWH Planning Policy Team, Wallingford

Nicola Blackwood, MP

Ed Vaizey, MP

Eric Pickles, Secretary of State