

VWHDC Local Plan 2031 Part 1: Strategic Sites and Policies, November 2014

Response to Public Consultation

Date: 17 December 2014

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To: VWHDC Planning Policy

Subject: Objection to the VWHDC Local Plan 2031 Part 1: Strategic Sites and Policies, November 2014

I write to object to the VWHDC Local Plan 2031 Part 1: Strategic Sites and Policies, November 2014 because I consider the Plan to be unsound. My reasons are outlined below.

1. Core Policy 4 'Meeting Our Housing Need', 7 'Providing Supporting Infrastructure and Services', Core Policy 8 'Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area' and 13 'The Oxford Green Belt': Unsound because of poor consultation.

Overall, the VWHDC has not properly nor positively consulted its constituents on its draft plans and proposals. I believe that their consultation has been discriminatory not least because the Council has produced in a very short space of time a large number of documents and changes predominantly available only to those who can access its website. Constituents without internet access or those unfamiliar with long and complex digital documents and website hyperlinks are, in effect, disenfranchised. The Council also stresses that its preferred method for receiving comments/objections is by accessing and completing obstructive online forms with dissuasive portals.

The Cumnor Parish Council first learned of the Green Belt Review and Local Draft Plan on 4th March 2014 and most residents only in the final days before the VWHDC's deadline for comments, which was 4th April 2014. Parish Council officers received boxes of Vale leaflets ('Housing Delivery Update') and were expected to distribute them to households. Why were these leaflets not included in posted Council Tax notifications for 2014-2015? On many grounds, the VWHDC's failure to publicise, adequately, its Review, Plans and its own Comments (as though every resident is expected to check the Vale's website daily) is as deplorable as its rush to impose both a plethora of documents (many of them inconsistent and rapidly changing) and highly contentious plans for potential house building on Green Belt sites across the Vale.

Posted leaflets and communications to all households were only used *after* the VWHDC Full Council, 15 October 2014, when the main motion from Cabinet to agree the Draft Local Plan was accepted for the purposes of pre-submission public consultation prior to submission to the Secretary of State for independent examination. The drive to get the Draft Plan approved on 15

October 2014 (1) was at the expense of a proper and full consultation with residents and constituents, (2) ignored important procedural and policy challenge, and (3) seriously understated substantive opposition to the proposals as represented by several thousand written responses to the Council and voiced at public meetings convened to discuss the Draft Plan and Green Belt Review. I, therefore, argue that the Plan is unsound because it has not been positively prepared.

2. Core Policy 4 ‘Meeting Our Housing Need’ and all those directly related especially Core Policy 7 ‘Providing Supporting Infrastructure and Services’ and 13 ‘The Oxford Green Belt’: Unquestioned reliance on the Oxfordshire ‘Strategic Marketing Housing Assessment’ (SHMA) is unsound and unsustainable.

The ‘VWHDC Local Plan 2031 Part 1: Strategic Sites and Policies’ is based on the very high forecasts of projected housing need from the much disputed Oxfordshire SHMA. It should be noted that the Oxfordshire SHMA (March 2014) stresses that its projected housing need figures are ‘interim projections rather than official statistics’ and that whilst they ‘provide “a starting point” for housing need, they should to be treated with a significant level of caution’ (paragraph 3.11). The author (GL Hearn) provides reasons for this major qualification including the need for care over projections for economic growth, many of which have proven to be erroneous particularly since the Banking crisis of 2007-2008 and its legacies. Economists argue that these legacies will not be over for many years to come. Therefore, all planning based on projected economic growth and job creation has to proceed with caution. The forecast of housing need is itself based on another questionable forecast that 85,000 new jobs will be created attracting more people to the county. Government figures for growth have been regularly down graded confirming that hopes of aggressive economic growth and the need for particular types of house building should be subject to detailed public consultation and/or independent scrutiny.

The Oxfordshire SHMA author also emphasises (paragraph 4.11) that the SHMA ‘does not set housing targets’ only provides an ‘assessment of the future need for housing’ (again see paragraph 3.11). And whilst Hearn acknowledges that Government guidance and advice is ‘explicit’ that the SHMA ‘must not apply constraints to the overall assessment of need, such as environmental constraints or issues related to congestion and local infrastructure’ (which appears to be at odds with the National Planning Policy Framework—NPPF, March 2012) the author stresses the importance of these issues: ‘They are very relevant issues in considering how much development can be sustainably accommodated and where new development should be located’ (paragraph 4.11).

The Oxfordshire SHMA has been much criticised by the public, organisations (such as CPRE) and 3 out of 5 Oxfordshire politicians have acknowledged that the SHMA projected figure is too high: in fact, more than two and a half times the figure of the Government’s official household projections.

To my knowledge, there has not been any response from the VWHDC to such criticisms of the SHMA, which seems to be accepted by the Council as a given fact not a questionable projection (questionable even by the SHMA's own author). There is little evidence that the Council has scrutinised the SHMA figures subjecting them to due diligence and full consideration. Further, the Vale's proposals to release Green Belt land (see below), which is contrary to Government policy (only to be released in 'exceptional circumstances'), for contested projected housing need is highly dubious at best.

3. Core Policy 13 'The Oxford Green Belt' 4 and Core Policy 8 'Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area': Inconsistent with the NPPF and other Government Policies.

The CPRE and others wrote to the Leader of the Vale to object to the Oxfordshire SHMA and Green Belt Review prior to the VWHDC's earlier deadline for comments (4 April 2014). The Government's NPPF makes clear that a Green Belt boundary may be altered only in 'exceptional circumstances'. The Oxfordshire SHMA expresses caution about projected housing need and reiterates the importance of environmental constraints and issues related to congestion and local infrastructure. These seem, largely, to have been ignored in the Vale's acceptance of the draft Local Plan at its full meeting on 15 October 2014.

The Council's acceptance was strange as only two weeks before, on 4 October 2014 (updated 6 October), the Housing and Planning Minister and the Communities Secretary, published 'Councils Must Protect Our Green Belt Land' (<https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>). This guidance on the Green Belt reconfirmed well known Government policy enshrined in the NPPF (see especially Section 9) and guidance updates (see 6 March 2014). 'Councils Must Protect Our Green Belt Land' reiterated that Councils must 'safeguard their local area against urban sprawl, and protect the green lungs around towns and cities.' Government Green Belt policies are very clear: prevent urban sprawl by keeping land permanently open, prioritise thousands of existing brown field sites, Green Belt boundaries should only be changed in 'exceptional circumstances', and unmet housing need is *not* an 'exceptional circumstance' to justify removing land from Green Belt designation.

I will give just one example because it is an area that I am most familiar with: the current proposals for Cumnor, which the Vale contentiously designates as a 'large village' despite its relative lack of facilities (one threatened PO/general stores, a newsagent and a butcher's). Surely, Cumnor is a 'small village'? It is difficult to understand why particular parcels of land, rather than others, have been identified by the consultants commissioned by the VWHDC. The criteria used are unclear; so, too, how SHMA figures could have been rigorously applied given the proximity of their publication dates (as the SHMA is dated March 2014 and the 'Green Belt Review' dated February 2014 how can the latter be properly based on projected figures in the former?). What, too, of the crucial caveat in SHMA paragraph 4.11 and the government's own stress on the importance of the existing Green Belt in its NPPF reiterated in 'Councils

Must Protect Our Green Belt Land', October 2014? Did the consultants (commissioned by the VWHDC) actually visit the village, walk its streets and roads, familiarise themselves with its paths and geography? For example, several descriptions of 'parcels' of land use the phrase 'strong tree line' to designate a proposed new Green Belt boundary: in many cases actually visiting the sites—rather than using aerial maps—would have revealed that this claimed 'strong tree line' is often only a scrawny hedge.

I still wonder how responses in the 'VWHDC's Comments on the Green Belt Review', February 2014, were compiled. Here is just one inconsistency. Numbers 24 and 6 are 'agreed' though the site includes Cumnor Cricket ground and related sporting facilities yet number 8 is 'not agreed' because it contains 'playing fields'. The VWHDC's rush, not least in relation to Cumnor, appears insensitive to these issues and to the democratic requirements of full and proper consultation. The Green Belt land around Cumnor is totally consistent with what is stressed in the Government's 'Councils Must Protect Our Green Belt Land'. Numerous walkers and runners enjoy rights of way on 'parcels' of land identified in the above 'Review' (Phase 2 and Phase 3 Reports) and 'Comments' as suitable not only for removal from the Green Belt but also for the construction of 200 new houses (on each site). The 'parcels' include number 3 (Cumnor) in the 'VWHDC Green Belt Review Phase 3 Report' (page 5) and in the 'VWHDC's Comments on the Green belt Review' (pages 7 and 15). Other 'parcels' of land (within Cumnor Parish) identified in these documents (numbers 1, 2, 4, 5, 6, 8 and 24) also include—apart from homes and families—similar rights of way, recreational and sport facilities, important flora and fauna, and even the remnants of a significant historical site, Cumnor Place (24). In all, there are 8 large 'parcels' of land in Cumnor Parish being considered for removal from the Green Belt and, therefore, open to housing development. With the Timbmet and Tilbury Lane developments, plus small infill building sites, Cumnor will have already provided around an extra 600 houses in recent years. These developments have put the existing infrastructure under intolerable pressure. What effects would these extra proposed sites have on the infrastructure and environment if removed from the Green Belt and eventually (given the Plan) become home to 200 houses on each? The Plan seems not to consider these effects.

Removal of the Vale's proposed Cumnor sites from Green Belt designation leaves them open to speculative building proposals creating a corridor of urban sprawl into Oxford. Access to the city is already highly problematic because of major congestion on the Botley Road. The A420 is often at a standstill, so too the connecting roads of the A34 and Oxford ring road (please see below on infrastructure). Cumnor is just one small example of the failure of the Local Plan to respect not only historic Green Belt land but also the present Government's policies on the preservation of the Green Belt.

4. Core Policy 7 'Providing Supporting Infrastructure and Services': Local Plan is not positively prepared, not effective, not justified.

There is a lack of appropriate infrastructure (adequate roads and network, public transport provision, sewers and so on) and facilities (e.g. schools, GP

surgeries and health centres) to support the Local Plan as outlined. There are no convincing Council plans to provide infrastructure and facilities within the timescales to meet the Local Plan's adherence to SHMA contentious projected housing needs. Also, the Plan has not taken into consideration the impact on the environment of thousands of extra houses (including consequent vehicle emissions) and the countryside (radically transforming areas out of all recognition). Again, let me cite Cumnor as one small example. The areas designated for removal from the Green Belt can only be accessed by narrow village roads and residential areas already congested by parking problems and commuter runs. There has been a long history of unpredictable and inadequate sewerage systems, several of the roads have above ground electricity supply, local schools are oversubscribed (the Primary School is at full capacity with no room for expansion), GP service at Botley Medical Centre are already hard pressed, existing public transport provision would not cope (peak time buses are already full upon leaving Cumnor), and there are limits on existing recreational sites and facilities. Road routes into Oxford are already overwhelmed and public transport often subject to unpredictable delays because of congestion (a city defined by its rivers and bridges causing bottle necks). The A34, which would also provide a main transport link to the projected newly-created jobs, for example near Harwell, could not cope. Regular users of public transport and of cars on these routes can testify to their existing overwhelmed congestion.

Suggested Modifications to VWHDC Local Plan 2031 Part 1: Strategic Sites and Policies.

1. Implement full and inclusive consultation with residents and communities.
2. In line with Government policies drop all Green Belt Sites from the plan and concentrate, as Government documents insist, on brown field sites across the Vale (NPPF, 2012, especially Section 9, 'Councils Must Protect Our Green Belt Land', October 2014)
3. Scrutinise and retest the SHMA in line with the SHMA author's own caveats about housing need and projected numbers (paragraph 3.11). Heed the SHMA author's insistence that 'environmental constraints or issues related to congestion and local infrastructure' are 'very relevant issues in considering how much development can be sustainably accommodated and where new development should be located' (paragraph 4.11).
4. Concentrate on sites with existing adequate infrastructure and facilities and/or those that can be expanded quickly and sensitively to meet defensible housing need without harming the environment and minimising negative effects on existing communities.
5. Concentrate on areas where expansion would be beneficial including those where developing infrastructure (transport hubs such as new rail stations) would be welcomed and enhance existing and expanding communities. Core Policy 19: Reopening of Grove Railway Station is one example.

6. Take on board Government initiatives such as Garden Cities linked to existing and developing infrastructure. One example is Oxford Parkway linking by 2016 Oxford Rail Station with Bicester (designated Garden City) and stations to the North plus stations to London Marylebone.

Professor Francis Frascina
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