

# **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 2 – Objectively Assessed Needs for Housing and Employment Land**

### **2.1 Is the identified objectively-assessed need for housing of 20,560 new dwellings (an average of 1028 per year), as set out in policy CP4, soundly based and supported by robust and credible evidence? In particular:**

#### **(a) Are the SHMA's demographic adjustments to the 2011 CLG Household Projections soundly based?**

- SPADE made previous representation on the SHMA believing it to be “unsound and unsustainable and should not be relied upon.” SPADE now endorses the submissions made by The Campaign for the Protection of Rural England concerning the SHMA. In summary:
  - The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable
  - It makes spurious assertions for net migration
  - It adjusted the projected average household size figures in an unsound manner
  - It fails to recognise that growth lost in the global credit crunch is effectively lost in perpetuity and seeks to make back the shortfall
  - It assumes a level of growth based on the unelected and unaccountable Local Economic Partnership assessments that lack credibility in relation to other official estimates
  - Makes errors concerning the requirements for affordable housing and the potential for increased supply to reduce local house prices
  - Overall the SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire
 Perhaps the Vale should objectively assess the SHMA figures with the same rigour it has applied to Oxford City's figures

#### **(b) Is it appropriate to include an allowance for addressing past shortfalls in the delivery of housing against the South East Plan housing requirements?**

- No. For the same reasons as stated in (a) above the growth and consequential need

that might have transpired had it not been for the global credit crunch should be considered as lost in perpetuity. Government projections for future growth are continually downgraded and the world economy not least Britain or Oxfordshire are not immune

- Previous shortfall should certainly not be used to justify that the scale of need outweighs the very special circumstances needed to develop in areas of green belt

**(c) Is the SHMA's adjustment to take account of forecast economic growth as set out in the Cambridge Econometrics/SQW report soundly based?**

**(i) Are the report's forecasts of employment growth in the District realistic?**

- Much of the forecast of need is based on another forecast that 85,000 new jobs will be created, attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and housebuilding rates and it has not been subject to public consultation or independent scrutiny.