

Vale of the White Horse Local Plan 2031 Part 1 – Housing Delivery Update February 2014

Comments by CPRE Vale District Committee

Summary

The proposals in the Housing Delivery Update ('the Update') are unacceptable. They are premature, impracticable, unsustainable, disproportionate, and an affront to localism. They pay no regard to the interests of existing communities in the Vale or to its natural and historic heritage, and will have disastrous consequences for the rural character of the Vale.

Introduction

2. These comments have been produced in some haste to meet the consultation deadline, and without an opportunity to review the full Strategic Housing Market Assessment ('SHMA') on which the Update is based, as only parts of this are currently publicly available. They should be read against the background of our response to the Local Plan 2029 Part 1 which offered a reasoned critique of the then less overstated plans for extra housing in the Vale and of their implications. Our views on all the policies in the earlier document remain unchanged – and in some cases are given added emphasis by the grossly inflated increase in house-building announced in the Update. Our Chairman's letters of 6th March 2014 to the Leader of the Council (annex 1) and to Parish and Town Councils of 12th March (Annex 2) are attached as precursors to this document.

Prematurity

3. The Vale of the White Horse District Council ('the Council'), alone among the local authorities concerned, has allowed itself to be stampeded (or has stampeded itself) into producing detailed strategic housing allocations on the basis of the SHMA in advance of its publication. In doing so, it has cut out a crucially important stage in the process, identified in para 1.12 of the Oxfordshire SHMA Key Findings document itself, of testing whether the assessed housing need can be accommodated, and 'to identify where housing should go, and to plan for the supporting infrastructure investment which will be needed to ensure that growth is sustainable.'

4. This further work should not have been by-passed. It would have been an opportunity to challenge the overall level of housing provision which needs to be planned for. It would also have provided an opportunity to take account of environmental constraints and issues related to transport, school places, health provision and other necessary local infrastructure in considering how much development can be sustainably accommodated. The Council has in our view failed in its responsibility to the communities it represents by failing to allow for these factors in adopting the SHMA numbers without modification, and by precipitating land grabs for development on green-field sites throughout the District.

5. Moreover, the SHMA, despite its name, is not strictly speaking a market-led assessment. The market underlying the final incremental tranche of its assessment of housing requirements does not yet exist. It is justified by an 'emerging'¹ (ie presumably not

¹ SHMA Vale non-technical summary para 4.26

finalised) Strategic Economic Plan for business expansion underpinning the Oxford City Deal and drawn up by the Local Enterprise Partnership (on which District Councils are represented but which is not accountable to local electorates).

6. The SEP envisages aggressive growth in economic activity and employment. We are not in a position to question its deliverability; but it is clear that the component of housing growth derived from it in the SHMA is highly speculative. The Vale's proposed approval of housing construction long before it is clear whether the jobs are there to be filled is therefore exceptionally vulnerable to the consequences of a shortfall in SEP targets. There is a huge risk that housing approvals will outpace the market as it emerges in reality rather than on paper. If jobs lag behind SEP forecasts, the developers may delay the pace of construction, leaving half-completed developments as eyesores, and an even higher proportion of the houses that are completed will go to people travelling to work elsewhere, if they can be sold at all. The commuters will add still further to the problems of Vale's traffic problems. The Update does not even seem to recognise the need to keep the pace of approvals under review, in case the theoretical market growth is not realised in practice.

7. In addition, the Council has needlessly compromised its freedom of manoeuvre in relation to the Oxford Green Belt. It has publicly identified seven specific areas in the Oxford Green Belt for immediate strategic development and proposed the removal of seventeen other areas from the Green Belt for possible future development. In doing so it has prejudiced its ability to argue against other parties pushing for such development if it changes its mind (as we believe it should) in the light of this consultation. Mr Boles has said that the duty to cooperate is not a duty to agree²; but in effect the Council have agreed before the question has even been put.

8. The over-hasty actions of the Council lend a hollow ring to the words of the Leader of the Council, 'there is no escaping the challenges that have to be met'³; those very actions have helped to precipitate the challenges now faced by the communities of the Vale. They threaten the characteristics that lead to its inclusion as one of the most desirable rural areas in the country⁴, and they have cut off access to potential ways of mitigating the adverse consequences of what is proposed.

Impracticability

9. The target construction figure of 1,028 homes a year derived without qualification from the SHMA looks absurdly ambitious when set against the 702 homes actually completed in the two years 2011-2013⁵. The absurdity is compounded by the Council's plan to re-establish its five-year housing supply by front-end loading the new construction to achieve an extra 4,000 homes in the five years 2014-2019 (i.e. starting now) giving a total construction rate that we estimate at about 1,460 houses a year. That is obviously over-optimistic, given that many of the sites identified as part of the programme have only just been identified as available for development, and given the ownership, legal, planning and other matters that need to be settled before construction can start. Moreover, although developers will rush to secure the newly identified development sites and establish planning

² Parliamentary Secretary for Planning Written Statement - Hansard 6th March 2014

³ Update page 3

⁴ Halifax survey reported in the Telegraph 24.3.14

⁵ Update table 3.1

consent for construction, they will not hurry to complete houses if they cannot find purchasers for them.

10. The Council has dug a huge trap for itself and then stepped blithely into it. Having failed for years to plan construction on a large enough scale to secure a five-year supply, it has subscribed to an economic plan that generates an implausible need for even greater construction. It has opened up the prospect of a perpetual frantic chase after the wild goose of a five-year supply throughout the planning period, with all the vulnerability to off-Plan development approval by the Inspectorate that that brings with it.

Unsustainability

11. The National Planning Policy Framework⁶ identifies three roles for sustainable development – economic, social, and environmental. The Update fails to comply fully with any of the three for the following reasons:

Economic role

The NPPF requires plans to identify and coordinate development requirements, including the provision of infrastructure. The Update identifies infrastructure requirements in its nominated sites, but offers no indication that they will be carried out in a timely and coordinated way. Indeed, at a public meeting a senior councillor accepted explicitly that infrastructure would follow rather than accompany development and that there was a risk that this would lead to some degradation of services. That represents a serious and unacceptable departure from good planning practice, which is all the more deplorable because of existing inadequacies. Road capacity is a major case in point with well-documented overloading on the main roads in the District and on many of the minor roads at the points where they join them (there appears to be a shortfall in identified funding of transport infrastructure improvements for the Science Vale Enterprise Park alone of some £80m⁷).

Social

The NPPF requires plans to provide accessible local services that reflect a community's needs. The Update identifies a number of new sites for home building near communities with only limited local services, and offers only sketchy ideas for supplementing them. Indeed, it uses the word 'sustainable' as a synonym for 'where we can get away with building without adding to local services' – see for example paragraph 4.4. Taken with the acquiescence in the degradation of services referred to above, the Council is falling short of its obligations in this area.

Environmental

The NPPF requires plans to contribute to protecting and enhancing the natural, built and historic environment. The Update plans the piecemeal addition of houses on twenty-one green-field sites (most in places where they will permanently impact on the character of existing country villages), a major encroachment into the Area of

⁶ NPPF paragraph 7

⁷ Local Plan 2031 Infrastructure Delivery Plan: Total amount secured so far 'Up to £62.3M' (para 3.2); total funds required £139.24 (Table 1 last line)

Outstanding Natural Beauty (AONB) and building on seven areas currently classified as Green Belt. It also proposes to remove 17 other areas from the Green Belt that ‘may be considered for development as part of preparing the Vale Local Plan Part 2’⁸). These plans demonstrate – at best – disregard for the environmental requirement of the NPPF.

12. The assaults on the Vale’s rural character contained in the Update are not reversible. The AONB will be permanently disfigured by the Harwell Campus site, the Green Belt will be permanently eroded, the country villages targeted will forever have large modern appendages. The areas concerned are part of an increasingly scarce resource – the countryside – and, despite the inappropriately bland tone of the Update (see paragraph 1.18 for example), such losses are not sustainable in any reasonable sense of the word.

13. Both the North Wessex Downs AONB and Oxford Green Belt Network have made clear to us that they are totally opposed to the vandalism of the countryside in their areas of concern. For the reasons set out above, we wholeheartedly support their stance. We strongly urge the Council to reconsider its proposals to build in the Green Belt in the light of the minister’s statement to Parliament at the beginning of March⁹ that the government is reaffirming Green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the Green Belt and other harm.

Disproportionality

14. The Vale allocation of new houses in the Oxfordshire SHMA is out of all rational proportion to the ability of the district to absorb it. The Council should have sought to challenge the basis of the forecasts. Within the total the District is second only to Oxford itself in relation to existing population. We regard that also as too high. The Council should have used the review after the publication of the SHMA to argue against both the total and its share in order to demonstrate to its electorate and other parties that it has a proper regard for the need to protect the Vale countryside, its Green Belt land and the AONB.

15. The disproportion applies with especial force to the South East Vale. We do not have exact figures for the existing housing stock in the SE Vale, but believe that the 70% of planned housing there must represent more than a doubling. Much of the new sprawl of building will take place on elevated ground that provides a pleasant rural backdrop to Didcot and in land that has contained the fruit orchards that give this part of the Vale its character. The sheer scale of building in this one area of the Vale is obviously disproportionate and will hugely damage an important facet of the Vale’s rural character.

Affront to Localism

16. It is impossible to reconcile the way in which this plan is being imposed on the communities and electorate of the Vale with the principles of localism. It is being driven by the growth policies of central government and by ambitious economic plans drawn up by a Local Enterprise Board on which District Councillors sit but which is not accountable to voters. The plan involves an increase of 40% in the population of the Vale (50,000 on a current population of 120,000). We believe that demographic trends on unchanged policies

⁸ Update paragraph 4.24

⁹ As footnote 2

would give a growth of about 10% in the period to say 132,000, giving a net policy-driven increase of 38,000. We doubt whether the electorate, if consulted, would welcome such an influx; and our contacts with the Parish Councils suggest that most if not all oppose the sudden imposition of new building sites on their boundaries. The process is making nonsense of local development plans: in one case the Parish Council has been told that the sites for extra housing that it had identified for development are not acceptable and that it must instead accept construction on a single site that it does not regard as appropriate. The whole exercise is grossly defective in democratic terms.

Conclusion

17. The Update is flawed and will not work. Attempting to implement it will cause irreparable harm to the Vale's natural and historic heritage.

31st March 2014

Annex 1 – Text of letter of 6th March 2014 from Chairman of CPRE Vale District Committee to Matthew Barber, Leader of VWHDC

Dear Matthew,

Local Plan 2031, Part 1, Strategic Sites and Policies, Housing Delivery Update

Strategic Housing Market Assessment (SHMA)

CPRE was grateful for the opportunity to learn more about the draft Local Plan Part 1 at the Stakeholders' Meeting in Steventon on 3rd March.

However, the discussions brought out all too clearly the effect of the proposed 40% increase in the number of houses to be built in the Vale for the period up to 2031. (The increase in the South-East Vale is higher and may be as much as a doubling.) So we were reinforced in our view that the scale of building for which your Council is planning will be disastrous for the beautiful rural nature of the Vale and for the heritage sites and villages which make it such a desirable place to live. We are deeply concerned by your intention to build 1400 houses (with 2000 to follow) in the AONB, and by your proposed incursions into the Oxford Green Belt.

We understand the constraints placed by Government and its agencies on Oxfordshire and the further difficulties arising from the Vale of White Horse District Council's failure to meet its housing land supply targets. We also note the duty to cooperate. However, as Nick Boles said yesterday, 'the duty to co-operate is not a duty to accept. We have considered and rejected the proposals of HM's Opposition to allow councils to undermine Green Belt protection and dump development on their neighbours' doorstep'.

In this context we have grave concerns about the proportion of houses allocated to the Vale by the Oxfordshire SHMA. We wish to be assured at once that the total percentage increase in the number of houses to be absorbed by the Vale is no greater than those needing to be built in other Oxfordshire districts (with variation only to cover the current 'buffer' imposed to meet deficiencies in meeting targets).

We recognise that part of the Vale's SHMA allocation involves houses needed in relation to Science Vale. Any houses allocated because of this proposal should, of course, not count as an extra, but as part of the figure to be compared with the number of houses built in other Districts.

We were also alarmed to hear from Mike Murray at the Stakeholders' Meeting that 'there might well be a degradation in infrastructure', as infrastructure will follow, rather than precede (as we have repeatedly urged), the occupation of new houses. That abandonment of good planning principles is hugely damaging and must be kept to a minimum. We believe that the more houses are built the greater the damage; a fair SHMA figure is therefore all the more important.

We note that the SHMA takes as its starting point the very ambitious figures for economic growth emerging from the plans for the Science Vale and the Strategic Economic Plan. The possibility that these figures are too optimistic, together with your intention to frontload the extra housing you believe to be required, puts the Vale at risk of creating a surplus of housing for which there is no market. We believe you must build in arrangements for careful monitoring and review on a regular basis to ensure that this does not happen.

To sum up, it is vital that the District Council should not agree to any percentage increase above the average across all the County's Districts. We consider that taking that extra time to ensure an appropriate and fair SHMA is imperative, in order to obviate an unacceptable increase in the Vale's housing which would blot our landscape beyond recognition.

I am copying this letter to Mike Murray and to Adrian Duffield.

Yours sincerely,

Peter

(Dr P.J. Collins, Chairman, CPRE Vale of White Horse Committee)

Dear Councillors & Clerks,

CPRE is deeply concerned that proposed housing numbers in the Oxfordshire Strategic Housing Market Assessment (SHMA) have been adopted into the Draft Local Plan by the Vale of White Horse District Council without adequate assessment of whether these numbers are realistic or sustainable. **We urge you to join us in writing to the District Council NOW, in advance of any other response to the latest Local Plan consultation, to highlight concerns over these ridiculous and unachievable targets.**

The SHMA figures, published last week, propose growth of over 100,000 houses in the County by 2031. The suggested figures for the Vale are 20,560 houses by 2031, an average of 1,028 houses a year, equivalent to a 40% increase in the Vale's housing supply.

As you will be aware, the Vale of White Horse District Council has immediately adopted these figures as targets in the update to its Draft Local Plan. It has led to 21 new development sites being proposed, including over 1,700 houses spread across seven sites within the Green Belt and 1,400 houses at Harwell, in the North Wessex Downs Area of Outstanding Natural Beauty. Frontloading of the figures to make up for previous under-supply means plans for as many as 1,460 houses a year in the first five years.

Even those communities not directly affected by housing development will inevitably feel the impact of the enormous additional demands on infrastructure and services, in particular roads and schools.

Please write to Matthew Barber, Leader of the Council, (copied to your Vale of White Horse District Councillor and ideally to us too) and ask him to:

- 1. Question the methodology of the SHMA which is being driven, especially in the Vale, by ambitious economic growth plans that are contained in the draft Oxfordshire Strategic Economic Plan. This has not been subject to public consultation and is led by the Oxfordshire Local Enterprise Partnership, an unelected private sector-led organisation.**
- 2. Assess the SHMA figures in the light of environmental and social considerations. *The SHMA does not address these issues and makes it clear they need to be considered by District Councils.*** (See Oxfordshire SHMA report para 1.12) That stage in the process appears to have been omitted. Given the scale of what is being proposed the Vale is failing in its duty by omitting this crucial stage of the process.
- 3. Consider the significant degradation in current infrastructure that will inevitably follow from building on this scale, especially to the extent proposed in the first five years.**
- 4. Work to reduce the frontloading of the figures in the first five years. This is particularly damaging as it is leading to a concentration on smaller, more easily deliverable greenfield sites and hence a focus on sites within the Green Belt and AONB. We do not believe this is sustainable and this should be a key factor in any negotiations of figures with neighbouring Districts.**

The District Council is keen to move ahead quickly to bring a swift end to the current planning free-for-all, caused by the lack of a five year housing supply and Local Plan. We agree this is important, but not at any cost.

Accepting such unsustainable and unachievable figures will merely exacerbate problems for the future. If the targets aren't met, we will be back to square one on five year housing supply, but having sacrificed some of our most precious landscapes and put unacceptable pressure on many local communities.

Without changes, the consequences of what are being proposed will see the Vale, especially the eastern side, gridlocked and concreted. Councillors needs to rise to the challenge of reducing housing needs yet preserving the character and beauty of what is essentially a rural area.

Are they up to this challenge or are they just going to nod this through and close their eyes to the impact?

We attach a copy of a CPRE letter that has already been sent to all District Councillors. You can also see our response to the overall SHMA proposals on our website.

Please write now, irrespective of any further response you may wish to make to the Draft Local Plan consultation. We need to act quickly, before final decisions are taken, to make clear the level of opposition to these unsound, unachievable and unwanted proposals.

With thanks

Dr P J Collins
Chairman, CPRE Vale of White Horse District