

## **Vale of White Horse Local Plan - Detailed Policies and Additional Sites: Consultation**

**11 October – 22 November**

### **CPRE Oxfordshire's initial concerns and recommendations**

#### **Overview:**

- 1.** Oxford's unmet need is unsound.
- 2.** It is unsound to plan for a surplus.
- 3.** The SHMA itself is now proven unsound, as CPRE had always claimed.
- 4.** It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.
- 5.** Failure to refer in any detail to the proposed Oxford-Cambridge Expressway / Growth Corridor makes the Plan unsound.
- 6.** Building at the Harwell Campus is harmful to the North Wessex Downs Area of Outstanding Natural Beauty. It is unjustified and not consistent with national policy.
- 7.** Taking land from the Green Belt at Dalton Barracks is unjustified and inconsistent with national policy.
- 8.** The proposed development at North West Grove will have an adverse impact on the local infrastructure.
- 9.** Park and Rides at Lodge Hill/Cumnor and safeguarding of land for related new roads is unsound as it is inconsistent with national policy and cannot be justified.
- 10.** Didcot Garden Town proposals may be undeliverable.
- 11.** The proposed allocation at Fyfield (listed as Kingston Bagpuize) is unsound as the transport infrastructure is inadequate and it is not a sustainable location in relation to employment sites.
- 12.** There are a number of unsaved policies from Local Plan 2011 which need to be re-instated in order for the Local Plan Part 2 to be sound.

## **IN FURTHER DETAIL**

### **1. Oxford's unmet need is unsound.**

It is unsound to include Oxford's unmet need which is only a figure plucked from the air with no evidence even from Oxford itself to support it. The City has made no prediction of how many houses it needs, nor of how many it could build itself. Its current draft Local Plan contains no such hard numbers. What's more, the new official Government calculation for Objective Assessed Need (OAN) shows that Oxford in fact only needs 15,000 houses, half the level the discredited 2014 Strategic Housing Market Assessment (SHMA) had forecast. On CPRE's calculations, Oxford could not only build all those itself (using higher densities and land currently earmarked for employment purposes), but have land left over for the next Plan cycle as well. Unevidenced figures should not be included in Local Plans especially when being used to inflict harm on the countryside.

### **2. It is unsound to plan for a surplus.**

It is unsound to plan for a surplus against a housing target which will never be met in any case. Moreover, if the Plan goes ahead with a surplus, too much land will have been intentionally allocated and be cherry picked by developers, doing nothing for five-year supply. If the 2,200 (allocated for Oxford's unmet housing need) and the nearly 2,000 surplus, amounting to more than 4,000, were removed from the Plan, it would enable the Council to do away with the need for development at Dalton Barracks, the Harwell Campus, North West Grove, Kingston Bagpuize, North of East Hanney, East of East Hanney and East Marcham. To put this in context, this would still leave over 20,000 houses being brought forward within the Plan period, the equivalent of a 40% increase in the Vale's housing stock (subject to Pt 3 below).

### **3. The SHMA itself is now unsound.**

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is itself unsound, as CPRE has said since it was first published. It was never an assessment of housing need as it was sold to us, in the sense of local people needing houses, but a tool by which the Oxfordshire Growth Board and Local Enterprise Partnership (LEP) were able to justify industrialising our rural County, attracting tens of thousands more people into the area by building houses for them.

The Government has now accepted as much by publishing much lower housing need figures for Oxfordshire, in the Vale's case reduced by 33%, in Oxford's case halved (to just 15,000). The Plan should be recalculated on the new OAN numbers to remove the further excess of

houses (including the Oxford unmet need and the built-in surplus) and if necessary delayed to enable the District to take advantage of the new OAN regime.

**4. It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.**

It is unsound not to spell out a density target. We will not get cheaper houses just by planning for ever higher numbers builders will never build. The only way is to specify higher build densities which would automatically mean smaller and less expensive houses. We have enough low density high cost houses already; let us use the Plan to add high density low cost houses to the mix. We recommend that a fixed target density of 60 houses to the hectare, higher in towns, be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through CIL, for exceeding.

**5. Failure to refer in any detail to the proposed Oxford-Cambridge Expressway/Growth Corridor makes the Plan unsound**

The ‘elephant in the room’ is the proposed Expressway Growth Corridor. This is another growth scheme likely to be imposed on the Vale of White Horse, and is itself based on growth figures even higher than the discredited SHMA. It would be a major new road through the Green Belt and potentially another 100,000 houses within Oxfordshire. (The National Infrastructure Commission is basing the proposal on facilitating 1 million new houses, which over the length of the route would work out at an average of approximately 10,000 houses per mile.) It would be far and away the biggest planning event during the Plan cycle, causing the most harm to our environment and amenity, but gets mentioned only once. It is unsound not to spell out the scheme and its implications, and the Council’s proposed approach, within the Plan.

**6. Building at the Harwell Campus is harmful to the North Wessex Downs Area of Outstanding Natural Beauty.**

There are no exceptional circumstances for building 1,000 houses on the Harwell Campus in the North Wessex Downs Area of Outstanding Natural Beauty. Effectively the same plan was dismissed by the Inspector on our representations last time and it is at the least surprising to see it emerge again. This failed approach should not be revisited, especially given that the Plan is allowing for a surplus which could be removed.

**7. Taking land from the Green Belt is unjustified.**

The Plan proposes to remove a large area of land from the Green Belt at Dalton Barracks for the purposes of building 1,200 houses (in the first instance) - there are no exceptional circumstances to justify this incursion.

As shown above, the housing requirement is overstated. In any case, Green Belt sites should be released only in exceptional circumstances and when all alternatives have been found even more unacceptable. That is not the case here.

***Critically, there is no justification for Green Belt release at all, since all of the proposed development could occur without affecting the site's Green Belt status.***

It is Government Policy that a previously developed site in the Green Belt can be redeveloped provided the impact of the new development on its openness will not be greater than the old, and provided the land is not of high environmental value. It is our position that the number of houses allocated to the Dalton Barracks site could be comfortably accommodated without inseting all or any part of the site, and there can therefore be no very special circumstances for doing so.

**8. The proposed development at North West Grove will have an adverse impact on the local infrastructure.**

The proposed development of 400 houses at North West Grove would bring additional traffic to the already congested A338 and A417 and put further pressures on local schools, leisure facilities, and local health facilities.

**9. Park and Rides at Cumnor/Lodge Hill and safeguarding of land for related new roads is unsound as it is inconsistent with national policy and cannot be justified.**

The proposed Park and Rides at Cumnor and Lodge Hill are unsound because they will undermine the openness and permanence of the Green Belt, and encroach upon the countryside. CPRE Oxfordshire does not support the 'remote Park & Ride strategy' which does nothing to reduce traffic, but merely relocates journeys to rural areas. The fact that new transport routes across the Green Belt are proposed to support the Lodge Hill site suggests that its location is particularly inappropriate.

**10. Didcot Garden Town proposals may be undeliverable.**

We are concerned that the resources are not available to fulfil the Didcot Garden Town Proposed Delivery Plan. We are particularly worried that the housing developments (many

of which have already been given planning permission) will go ahead without the vast proportion of the much-needed infrastructure and sustainability improvements.

**11. The proposed allocation at Fyfield (listed as Kingston Bagpuize) is unsound as the transport infrastructure is inadequate and it is not a sustainable location in relation to employment sites.**

This site is not in a sustainable location in relation to employment sites, and it likely to become a dormitory suburb for commuters. However, the A420 is already regularly running at over-capacity even before the impacts of development allocated in Vale Local Plan Part 1 take effect. There are no adequate mitigation measures proposed with Local Plan Part 2 to allow for this development.

**12. There are a number of unsaved policies from Local Plan 2011 which need to be reinstated in order for the Local Plan Part 2 to be sound.**

There are a number of policies from Local Plan 2011 which have been identified by the Vale of White Horse District Council as consistent with the NPPF but which have not been taken forward in this Plan.

Policy DC8, relating to services and infrastructure is critical to setting out how these ‘must be provided in time to ensure co-ordination between their provision and needs arising from the development’.

Policies NE6-NE12, relating to environmental issues such as protection for the North Vale Corallian Ridge and the conservation of Oxford’s landscape setting are also vital. With the removal of so much greenfield land under Local Plan 2031 Part 1, the District Council must ensure an equivalent level of protection to its landscape and historic buildings as was given in the Local Plan 2011.