

Vale of White Horse Local Plan 2029 Part 1.

Small Village Alliance response.

Introduction.

Broadly speaking, when viewed solely from the perspective of small villages and hamlets, the Small Village Alliance (SVA) welcomes the Draft Local Plan. In particular we are pleased to see statements within the Foreword and in Chapter 1 of the Draft Plan which clearly states a commitment to ensuring the villages, as an integral part of what is recognised as a beautiful rural district are protected. These statements should be used as guiding principles throughout. We are keen to see the final plan, after amendments, adopted as soon as possible as this will bring to an end the rush of speculative applications which pose such a threat to the small villages. As an associated point, we urge the Vale leaders to use the draft plan as it stands now to support a robust position in considering applications.

There are, inevitably, parts of the plan which we do not support and there are policies being proposed which we believe require greater definition. Where this is the case we have supplied appropriate wording which we think will be helpful.

This response will be built around the questionnaire developed by the Vale but before moving into that form we would highlight three high level issues which are absolutely fundamental to the plan and which we believe undermine the draft as it currently stands.

- **Number of Homes to be built.** We understand the target being used comes from the old South East plan and that a more up to date evidence base is currently being worked up countywide. We await the outcome of that work with interest. In the meantime we stress two points. Firstly, the old figures appear to include a significant level of inward migration. The logic behind the new figures, when they come in the summer of this year needs to be absolutely transparent. In particular the link between inward migration and employment needs to be made clear. Secondly, in the event the target figures come out significantly higher than those currently being

used there may be a need to revisit the consultation – something we all hope to avoid. (More at Q11).

- **Supporting infrastructure and Sustainability.** The draft plan as it stands does not adequately address the issue of infrastructure. The main road system in the Vale is busy. At times it is blocked. Village roads are narrow and often single track. Transport in and out of small villages is almost always by car. Primary schools are at capacity in many cases. You state that your approach to infrastructure delivery and funding is still in the development stage but are pushing on with new home building at a pace. The two must be more closely aligned. Our response (and that of CPRE) to question 14 develops this point.
- **Traffic and the impact of Swindon developments on the western Vale.** There appears to be no co-ordination between Swindon Borough and the Vale on the huge developments to the east of Swindon. The impact this will have on the A420 and other roads is the subject of a detailed investigation by Highway consultants engaged by the Western Vale Villages (WVV). We had hoped to have the result of that work by now but the detail is complex and has therefore taken longer than wished. It will be submitted by the WVV by the 16th May and we support WVV in their submission.

You will be aware that the SVA have been working closely with CPRE on the issue of this draft plan. CPRE have a county wide remit whilst SVA is just that – small villages. Nonetheless, our thinking is very similar on most of the issues. CPRE have submitted a comprehensive response to the draft and the SVA wish to make it clear that we support their very detailed submission. That said, there are two separate responses from these two separate bodies.

Question 1

Do our policies provide a clear indication of how a decision maker should react to a development proposal? Please identify any that do not, suggesting how they could be improved

No.

Core Policy 2: Settlement Hierarchy. We welcome the Settlement Hierarchy and support it as listed. However; detail within it needs to be firmed up. The narrative states *“The Smaller Villages have a low level of services and facilities, where any development should be modest in scale and primarily be to meet local needs.”* Whilst that sounds encouraging it is, we believe open to interpretation. What is “Modest growth” and how are local needs defined? We propose the policy should read as follows

- What constitutes “modest growth” should be a matter for each Parish Council to decide, taking into account their Neighbourhood or Community Plan and their view on village sustainability criteria. Parish Councils should also consider the overall Vale Local Plan requirements. In any event, modest growth would not be expected to exceed 5% over the period of this plan other than in exceptional circumstances as judged by the Parish Council.
- Local Needs should be decided by each Parish Council on the basis of consultation with those within their Parish.
- The word “primarily” should be removed altogether. It leaves the door open for subjective interpretation and as such its use will cause problems as developers seek exemptions.

Infill. We find developers increasingly referring to applications as “infill” when clearly that is not the case. We believe the Vale should take this opportunity to restate the obvious interpretation, through an additional policy. Infill is

“The filling of a small gap in a continuous built frontage by one, or at the most, 2 dwellings.”

Question 2

Do you consider that the plan in its current form would meet the tests of soundness [objectively assessed, justified, deliverable, consistent with national policy] summarised below? Please identify any significant areas where you consider the plan unsound, indicating what changes or further work you suggest are required to make it

No.

We refer you to our introductory paragraphs when we list three high level issues which we believe are in danger of undermining the plan. The Housing target is obviously crucial and may well change allocations in the future. Even though the old target is based on a now withdrawn South East Plan nevertheless the figures still do not add up and must have within them an element of inward migration. You project Vale population to increase from 121000 to 138743 by 2026, growth of 17743. You state household size is around 2.42 (all on page 20). That equates to a need for 7332 additional homes to meet local population growth. Yet your target is to build at a rate of 578 dwellings per annum over 15 years – total of 8670 new homes. In Chapter 4, page 38 I note an overall target of 13294 new homes between 2006 and 2029. Frankly, there seems to be a number of different target figures. This is far from reassuring. The lack of clarity and transparency on target figures means the plan does not meet tests of soundness as described in your question.

Question 3

The Vale of White Horse Local Plan 2029 will comprise Part 1: Strategic Sites and Policies, and Part 2: Detailed Policies and Local Sites. Before Part 2 is adopted we will continue to rely on the saved policies of the Local Plan 2011 (adopted 2006) listed at Appendix F. Is there anything else that should be included in Part 1 of the Local Plan?

Yes.

We would like to see a policy which protects the agricultural land within the Vale. Chapter 3, Supporting Economic Prosperity is, of course, something we all support. However, much of the land in the Vale is given over to agriculture. The Sustainability assessment shows areas of arable land and the specific grades in each area. (P24 of the SA). Grade 2 is the highest grade in the Vale. The SA makes the point that the majority of growth is to go on green field land. (SA conclusion point 2). Retention of good quality agricultural land is not only an essential piece of economic activity in the Vale it is also part of the attractive rural aspect you state you wish to maintain. Of the 13 key outcomes of the Supporting Economic Prosperity section on page 34, only one is given over to rural employment specifically and none directly relate to agriculture. Giving over agricultural land to building is contrary to the fourth Strategic Objective within the Spatial Vision, namely protecting the Environment and responding to climate change. It would increase the use of long distance transportation of food; reduce the potential for locally sourced food. We would wish to see an additional policy which specifically protects valuable agricultural land from development. Policy DC11 of the old plan seemed to deal with this issue quite well and we see no reason why it could not be included as a saved policy for the new plan. We suggest

- Development on best and most versatile agricultural land, defined as grades 1,2 and 3 of the agricultural land classification will not be permitted other than in the most exceptional circumstances. An overall shortage of housing is not deemed to be “most exceptional circumstances”.

Question 4

The Sustainability Appraisal accompanies the plan and will be published on 28th March. It appraises options for a number of policies and alternative strategic site options. Do you have any comments on the findings of the Sustainability Appraisal? Are there any other alternative options that should be subject to Sustainability Appraisal? Is there anything else that should be included in Part 1 of the Local Plan?

Yes.

The Sustainability Appraisal contains the following overall conclusions:

1. Housing numbers – the SA concluded that essentially the higher the housing number, the more sustainable the plan would be as this would address the fundamental issue in the Vale – housing shortfall. This is dependant however on further studies underway to provide further evidence and generate a figure for housing based on need. The SA will need to be updated when this figure is arrived at, including any implications there may be on distribution of growth.

A worrying statement which seems to imply the more houses built the more sustainable is the plan. We want a sustainability assessment based on the number of homes actually needed!

2. Location of growth – the majority of growth is to go on green field land. The Local Plan Part 1 has a range of policies that should serve to mitigate for any loss of amenity /biodiversity on these sites, however there is a concern over the quality of replacement green space and biodiversity under the no-net loss policies. This needs to be clarified in the future i.e. through a SPD.

This simply supports the point we make elsewhere about the need for specific objectives and policies which are designed to protect the green field land.

3. Natural Resources - development and population growth will lead to increases in resource consumption (i.e. energy, waste). It is a concern that the policies setting out the standards for new development are not as aspirational as they could be. Furthermore, the Vale should consider designating exemplar sites to deliver high standards on particular natural resources dependant on location (i.e. waste minimisation, renewable energy, water consumption).

This supports the case made by both CPRE and ourselves about the need to tie down developers to provide suitable infrastructure as part of their plans.

Question 5

Do you have any comments on Chapter 1?

No

Question 6

**Do you agree with the key challenges and opportunities we have identified?
Yes/No – if no what have we missed?**

No.

A small but important qualification on p21 in the last bullet point. The challenge here is to retain or improve vitality and sustainability of village life yet at the same time preserve the character of those villages. Difficult to define “character” in this debate but it is likely to include a phrase about not expanding them to become something other than attractive places with an obvious historic slant and clearly defined boundaries. The Core Policy 2, with our suggested amendment defining modest growth and local needs is key to finding the correct balance.

We would like to see the last bullet point amended to read as follows

- Maintain and improve the attractiveness, vitality and sustainability of existing rural communities and to do so in a way which retains the character, the scale and the rural nature of the villages.
- Helping to retain existing, and where appropriate, promote enhanced services in villages and to promote enhanced services.

Question 7

**Do you support our Spatial Vision for the District set out in para 3.5?
Yes/No -if no what would you change?**

Yes.

Question 8

Do you support the Strategic Objectives for our plan? Yes/No - if no what have we missed?

Almost – not quite.

The four broad headings are fine but we, again, feel there is insufficient emphasis on the rural communities. As it is worded, the strategic objective dealing with the environment and climate change focuses very much on modern

environmental challenges such as building design, air pollution, recycling. All good stuff but the traditional elements of the environment such as farming, locally produced food, clean rivers need equal prominence. In order to achieve this we propose

- There should be an additional Strategic Objective (under the Protect the environment and responding to climate change heading) which is distinct in terms of protecting the agricultural and green field element of our rural communities.

Question 9

Our vision and Strategic Objectives aim to promote opportunities for all across the district. Do you agree? Yes/No - if no please tell us more.

Yes. Though we assume by that you mean opportunities for the Local population. I refer you back to the projected growth figures comments.

Question 10

Do you support the Spatial Strategy for the location of development, including the Settlement Hierarchy, set out in para 4.8. If no, what would you change?

Yes.

We refer you to our response to question 1 (changes to core policy 2) and question 16 (changes to core policy 19). We believe these changes are essential if those two policies are to have any teeth at all.

We believe the role of Parish Councils is increasingly important in this new world. Whilst we want to see PC's have real clout in decision making over developments in their areas we also want them to engage in the process of deciding upon local needs. There are changes needed from both sides here but if Localism is to have any meaning then the Vale needs to delegate authority and Parish Councils need to work up local development needs.

Question 11

We are consulting on housing provision based on the South East Plan target of 578 homes per annum, as this remains part of our development plan until it is formally abolished. What are your views on this level of housing provision? (You can also comment on the other housing provision options we have tested set out in the Housing Topic Paper that will be published on 28 March 2013).

Firstly, the target of 578 houses per annum is above the population growth requirement. However, we know this figure is likely to change when the countywide Housing Needs Analysis is complete and so we will not go into a detailed critique of this figure other than to say it is much more than necessary to meet the growth of local population. The new figures, when they are published in the summer of this year are absolutely critical to the plan. We will be very interested to see how they relate to local population growth and anticipated employment growth (migration?) and how the 40% affordable housing target sits with the type of additional employment anticipated. It is possible that, if the new figures are significantly higher than the anticipated population growth then the Vale may have to revisit the consultation process.

Until such time as the new figures are available the unallocated 1055 houses in the “Remainder to be identified” columns should stay there rather than have them squeezed into areas where they may not be needed.

Question 12

Do you agree with the five strategic housing allocations proposed in the plan? If you disagree, where should we allocate land for the 5,150 additional homes required by 2029? (You may wish to review the alternative sites we have considered, set out in the Strategic Sites Selection Topic paper that will be published on 28 March 2013)

No.

We believe Abingdon must be nominated as one of the strategic sites. Whilst we acknowledge the difficulties associated with developing on the outskirts of this town the fact remains that Abingdon is the centre of gravity of the Vale. It is well located for employment and transport links, has a developed (and

recently upgraded) town centre, a number of schools and is the centre for local government. The problems with the approach roads are ripe for infrastructure development. We all acknowledge the traffic flow in the town centre is disproportionate and at times downright dangerous. There is a need to fix the current situation. However, it's not going to get any better with tinkering, which is what has happened up till now. This new strategic plan is a real opportunity to grip the infrastructure problems surrounding what is, arguably the most important town in the district. In doing so Abingdon could become one of the strategic sites for development and thus ease the pressure on rural villages. Put bluntly, excluding Abingdon from significant development means the additional growth has to go to the villages, large and small. This runs contrary to the guiding principles you have set out early in your plan. To an impartial reader it simply does not make sense not to take this opportunity to develop your main town over the course of a 15 year plan.

Question 13

Do you agree with the approach to employment land proposed in the plan? If no, what would you change?

Difficult to answer this without having clarity over the employment population and that, in turn, takes us back to target figures. The approach proposed has some merit but we reserve judgement until we are content with the figures.

Question 14

Our approach to infrastructure delivery and funding is still in development. To help us complete this work, what are your views on the approach set out in Core Policy 5 and the Infrastructure Delivery Plan?

From a small village perspective we subscribe to the following guiding principle:

While smaller villages accept that some development must take place to satisfy the demand for housing locally and in the wider Vale, there are important and necessary conditions that need to be met for approval to be given.

One such condition is that the current residents within the village must be able to gain some benefit from the development where the development increases the population of the village. No development should be allowed that would cause any degradation to the infrastructure or services within the village and any growth must be accompanied by defined benefits to the existing population.

An example might be improvements to the road infrastructure, recreation and social facilities, school places, retail and employment opportunities.

From a wider perspective we have serious concerns about the major road system within the Vale as it stands now. Significant road development will be necessary to meet the inevitable increase in car usage associated with increased housing and employment (whatever the target) and we see no sign of that moving beyond discussion stage. We see a situation developing where the Vale press on at speed with housing and employment development but the major infrastructure work at best lags behind or, heaven forbid, does not take place at all. The Western Vale Villages (WVV) has commissioned an important piece of work on the impact of Swindon development on the road system. More of that in their submission. The roads to the east of the Vale suffer similar problems. The A34 is becoming a nightmare for blockages at times. The capacity issue on the main roads serve as a reminder of the consequences of accommodating more people in the district than is necessary.

Given the reality around public finances it must fall to developers to fund infrastructure improvements associated with development and so there cannot be a “get out clause” in your policy. Core policy 5 includes an “independent viability assessment” into infrastructure provision. That leaves the door open for non provision or scaled down provision of infrastructure. It should simply be this – provide the necessary infrastructure or permission is refused.

Question 15

We have divided the District into three sub areas and devised strategies for each area. Do you agree with this approach and the levels of housing and employment development proposed for each sub area? If you disagree, what would you change?

Agree with the three sub areas and strategies for each. Our concerns about the allocation of housing numbers and employment have been set out earlier in this response. Clarity over numbers is essential to this plan. That has not yet happened.

Question 16

Do you have any comments on each of the district wide policies 18-40?

Core Policy 19: Rural Exception Sites. (Page 98 on the plan). Quite a lot of detail in this one but essentially it says “Affordable housing schemes will be permitted within and on the edge of villages; on sites that would not otherwise be acceptable for housing development ifthen a number of criteria to be met are listed. The issue here is that of infrastructure and sustainability. Developers argue that their profits from affordable housing schemes are insufficient to allow them to pay for infrastructure improvements. Your proposal is that such shortfalls should be met by allowing market housing to be added to the affordable houses. This opens the door for further market housing at a later date on sites which would not normally see planning permission granted.

We believe the policy should read as follows

- Rural Exception Sites should only be agreed if the existing infrastructure would already support the proposals.

In the event this is judged to contravene NPPF then an alternative would be

- Rural Exception Sites should only include a minimum level of market housing necessary to help pay for the appropriate infrastructure development associated with the site. In any event this should not be seen as setting a precedent for further market housing on the exception site.

Additional policies.

See proposed additional policy defining “Infill” at question 1 and the suggested policy designed to protect best agricultural land at Q3.

Saved Policies.

The list of saved policies on pages 183-186 of the draft plan is helpful but there are other policies deemed compliant with NPPF which are not saved. Some of them, DC11, H12 and H13 for example are very relevant to smaller villages and offer some degree of protection from over development. We would like to see the non saved policies reviewed, particularly in light of the outcome from your Sustainability Assessment and the very clear warning at Para 2 of the conclusion of that piece of work – *majority of growth is to go to green field land*. Seems to us this should provide you with grounds to re-assess some policies against the NPPF against the sustainability criteria.

David McWhirter

Small Village Alliance.