



Vale of White Horse – Consultation about the Statement of Community Involvement

Need not Greed Oxfordshire response

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together representing thousands of community members. Our campaign is committed to:

- A restoration of planning principles, with a proper balancing of economic, environmental and social considerations;
- Local democracy, with planning control in the hands of locally elected and accountable representatives; and
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.

Summary

We welcome this Statement of Community Involvement and the opportunity to comment.

Our key concerns are that:

- a) It should be made clear that community involvement should extend to the earliest part of the relevant process. In particular, key documents such as the Housing Needs Assessment currently being prepared for the Oxfordshire 2050 Plan, should be subject to transparent public debate. It is not acceptable for them to be presented as fait accompli 'evidence documents' without an opportunity to question the assumptions on which they are based. **We must at all costs avoid a repeat of the 2014 Oxfordshire Strategic Housing Market Assessment that was drawn up behind closed doors but contained aggressive and unrealistic growth targets that subsequently dictated the content of District Plans.**

- b) When levels of growth are under consideration, there should be a commitment to providing an option based purely on the natural growth needs of the existing population.
- c) The SCI focuses on the mechanisms of consultation but there should be greater clarity on how the outcomes are addressed ie how the local authority should engage and respond, including modifying the plan accordingly.

Detailed Comments

Para 1.2 needs to set out a clearer objective of consultation

This could be:

‘To give local people and organisations various good opportunities to get involved and influence and guide local plans and planning applications.’

This section on the principles of engagement should also make reference to sustainability and the climate emergency declared by the Vale, because of the long-lasting impact of development.

You should add a new paragraph 9.6, as follows:

9.6 Consultations on the Local Plan will offer a range of options and choices to consultees. These should all reflect any nationwide development policy, for example the current proposals to ‘level up’ England’s regions, notably the North of England.

As examples, options will include:

- Options that vary the overall level of growth for the district. A central option should always be to meet likely local needs based on past trends and tackle affordability problems. Other options might consider lower or higher growth than that. Lower growth might be necessary if constraints restrict development. Higher growth might be considered if there is clear evidence for that. If higher growth is considered it will be appropriate to consider mitigating the risk that it does not occur by phasing the release of land for development.
- Options that vary the location of new development (or explain why this is not possible).

Figure 1 – Three changes as follows:

1. Add at the foot of Figure 1 a note saying:

Note on the Pre-production stage

The first stage is 'Pre-production' during which evidence is gathered. This means assembling relevant information or data about the area, its residents, businesses, land-use, environment and so forth. There is no Community involvement at this stage.

However, if forecasts of growth are made during the first stage, many assumptions have to be made (these are not 'evidence'). In this case, the uncertainty will be recognised and explained. There will then be at least two different growth options for the Community to be consulted on in the next stage. One option will be based on past trends and the needs of the existing population. Other options may imply higher – or lower - growth than that.

This will ensure that the Community consultees can properly consider the key question of the Vale's overall growth prospects. Community involvement will not exclude considering the level of growth locally at an early stage, as happened in the previous plans.

2. Figure 1 - Amend the third box from the top

This stage is - 'Process representations received'

Amend this to:

Respond clearly and publicly to representations received and where appropriate modify the plan accordingly

3. Figure 1 – Amend the sixth box from the top

This stage is - 'Respond to representations received on the published DPD'

These will be representations just before submission of the plan to the Secretary of State, under Section 20 of the Town and Country Planning (Local Planning) (England) Regulations.

Amend this to:

Respond clearly and publicly to representations received and where appropriate modify the plan accordingly

Para 6.2 Review

This section should make it clear how the effectiveness of the SCI will be reviewed. What targets, if any, will there be for public engagement?

European/EU legislation

Mentions of Europe (or EU) in paragraph 11.9, the footnote on page 16 and the section on Strategic Environmental Assessment on page 35 need to be reconsidered. If it is not clear what the alternatives are, this should be noted. We would be unhappy if there was any weakening of the Environmental standards, which have often been ignored by those obsessed with rapid growth. There is an argument for specifically mentioning the climate crisis and the key zero carbon reduction targets as well.

The next sections will explain our concerns and reasons for strongly suggesting that the level of growth should be subject to early consultation and 'Community Involvement'

NNGO Reasons for concern about levels of growth

We have many reasons for concern about the levels of growth that the Vale (and other districts in Oxfordshire) have had to plan for.

Based on past experience, what the draft implies is that you will predict vast amounts of growth in the Vale and then the public will find that they can't reduce these figures or even amend the plan to reduce risks. With high growth figures the Vale will be hard put to meet the various housing land supply targets and this risks the plan being replaced by a free for all for developers.

Even if you elect a whole new set of councillors that agree there should be less growth, the government minister may intervene and give them no choice but to accept the high figures...

Detailed points are set out below:

- **There is no clear national spatial policy**, instead there seems to be a development everywhere approach (even in areas dominated by flood plains, AONB etc). Locally this meant that although large numbers of people were expected to move to Oxfordshire to find work, there was no consideration of the effect that this migration would have on the places that they came from. Now the government is apparently committed to 'levelling up' England's regions. This currently seems to focus on redirecting investment in infrastructure from London (in particular) and the SE region to the North of England. This government policy may widen to address other concerns – inequality and child poverty for example. This approach seems likely to reduce the prospects for very rapid growth in Oxfordshire, as there will be less money to fund the infrastructure that would be required to develop to such an extent.
- **The previous plans were entirely based on one set of figures, from Oxfordshire's SHMA¹** (Strategic Housing Market Assessment). This was produced by external consultants GL Hearn, who describe themselves as 'a *market-leading UK real estate consultancy*² in 2014. They produced forecasts for Oxfordshire districts in 2031 that assumed very rapid growth in high tech jobs that would attract people to Oxfordshire and they would need housing. About half of the growth planned for Oxfordshire was to deal with this additional need. GL Hearn is clearly not an independent source of forecasts.

¹ <https://www.oxfordshiregrowthboard.org/projects/oxfordshire-strategic-housing-market-assessment-shma/>

² <https://www.glhearn.com/who-we-are/>

- **Once these figures had been ‘accepted’ they were seen to be set in tablets of stone and beyond challenge by local people.** Valid criticisms were made of the figures at the Examination in Public of the current Plan but these were all dismissed. Meaningful consultation had been short-circuited by pushing high growth in at the ‘Pre Production, evidence gathering’ stage. Furthermore, the very rapid growth forecast for Oxford resulted in an overspill of housing need to the Vale (and other districts), which necessitated a second plan – ‘Part 2’ – where more sites had to be found for development.
- **The clear risks of this jobs-led strategy were not recognised or mitigated.** There was no contingency planning for the risk that job growth might not materialise. There was no means in the local plan to mitigate the risk - for example, by releasing land for development in a phased way. A very optimistic approach to development of the Oxfordshire economy was assumed. But this has clearly not worked. Many of the new jobs are (based on national and SE regional trends) zero hours contracts so typically low paid and temporary, not high skilled (eg Deliveroo). Many were taken up by existing residents of the County, not in-migrants (activity rates rose). Many are self-employed (eg delivery van drivers). Also, the economy is inevitably unpredictable. Who (for example) could have forecast earlier this year that by the beginning of April, most of the Oxfordshire economy would have been shut down by a microscopic virus? Who dare now forecast where the Oxfordshire economy will be by the end of 2020? Who can forecast what the effect of us leaving the EU (with or without a deal) will be in subsequent years?
- Into this process, came the proposals to build 1 million more houses in the **Oxford/Cambridge ‘Arc’**. With maybe 300,000 more dwellings in Oxfordshire. Linked to this was the proposal for an Oxford to Cambridge ‘Expressway’, about which there is continuing uncertainty.
- Also, there is the example of the recent treatment of South Oxfordshire’s plan. New councillors who were committed to reducing housing growth in that area were elected by local people. This has led to a long stand-off between SODC and the government minister, **Robert Jenrick**. He now requires SODC to hold an examination of their Local Plan and secure its adoption by December 2020. This seems unlikely to be the last word as this already tight timetable may be overcome by the plan being out of date and of course the Corona virus crisis affecting everyone involved.
- These problems are further illuminated by consideration of the housing development sites known as North and North West Abingdon (see following details).

With NNGO's focus on proper balancing of economic, environmental and social considerations; local democracy controlled by locally elected and accountable councillors; and environment and rural sustainability putting landscape, nature and rural communities at the heart of decision-making, we were concerned about this imposition of excessive growth and centralisation by Whitehall. We are concerned that the 'Arc' pressure means that planning history will repeat itself in the next local plan for the Vale of White Horse. We think that local people and organisations must be consulted about the overall level of growth.



Planning for Real **NEED not Speculator **GREED** in
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Appendix 1 North and North West Abingdon housing developments

NNGO's concerns can be further illustrated by considering the example of two sites in the existing Vale Local Plan (Part 1) – North and North West Abingdon.

- Local concerns about the North site focused on its being in the Green Belt, which should remain permanent and open, not least to protect the setting and character of Abingdon. There were other concerns, particularly about the high growth rate planned, traffic and the Lodge Hill slip roads. Also, about the effect of extra traffic on air pollution in Abingdon. These broader concerns were generally ignored to meet the excessive growth pressures. Some local comments were picked up with improvements promised on roundabouts at either end of Dunmore Road. Also, good pedestrian and cycle links to the site are underway, with pedestrian crossings at key points. And a noise reducing bund along the A34. However, comments on traffic were not possible until comprehensive estimates of the extra traffic emerged when the outline planning application was submitted – too late for locals to analyse and object. Many complaints about the difficulty of safely joining Dunmore Road (which is a bit of a race track) were ignored. We continue to believe that a roundabout is needed where traffic from the Local centre (the main entrance to the estate) meets Dunmore Road. Also, only a small meeting room will be provided in the Local Centre (probably too small for most social purposes) and the large sports provision will be at the far eastern end of the estate and may lack necessary management.
- So, in the Vale Local Plan, it was agreed that the North Abingdon site would have around 800 houses and the North West Abingdon site would have around 200 (Appendix (i) of the plan). Both sites were in the Green Belt.
- Outline permissions for the sites were for 900 homes and 50 retirement homes for North Abingdon and 200 homes (just in the part North of Wootton Road, not the triangle of Land between Wootton Road, Copenhagen Drive and the A34) for North West Abingdon. Remarkably, a figure of 'around' 1,000 has now increased to 1,150 at least. This is a 15% increase, which will no doubt noticeably increase additional rush hour traffic on the roads.
- At the Part 2 EIP, the developers promised that the two sites would build:
 - 109 houses or flats in 2017/18, and
 - 121 in 2018/19, and
 - 120 in 2019/20

So, there should have been 350 by April 2020. In fact nothing has been built by April 2020. Three years later, there is no sign of preparatory work on the

roads and other infrastructure that needs to be in place before houses can be built.

- The Vale's Housing land supply statement for 2019³ says that in 2020/21 25 houses are expected on the N Abingdon site, but none on the NW site. It seems very unlikely that any homes will be built in 2020/21, given the amount of investment needed to get started and the current economic disruption. So will another year pass with no development?

Thus, does the 15% increase in house numbers compared to the plan mean that 15% too much land has been zoned for building across the Vale? Does the lack of building mean that in practice, there was little need for these houses or that the economic assumptions behind it have proved wrong? Why was the Green Belt sacrificed so quickly?

In short, it is pointless consulting the public about the next local plan if you have already decided that you will zone land, often on the green belt, for far more houses than we will ever need – as happened in the last local plan. Nor do we think that building expensive new houses will sort out affordability problems. So, please reconsider your approach to consultation and the current focus on there being even more growth because we are in the 'Arc'.

³ http://www.whitehorsedc.gov.uk/sites/default/files/Vale%205yhls%20July%202019_0.pdf