

Closing Speech – Patricia McAleer

May I thank the WODC for being brave enough to reject this plan as unsuitable, even though they had the pressure of the 5-year plan. May I also highlight that their objection had nothing to do with thoughts of having fulfilled their land supply target, but as **experts** of the area, they **unanimously** knew that this site was **inappropriate** for housing development.

The appellants, with their ability to fund a large team to promote their cause, have brought out a multitude of **paid** experts – all of whom have, of course, said what they needed to say to make this proposal sound favourable. Unfortunately we, as locals, do not have the same funding or resources to pay our own experts to come and provide a counter to some of the disingenuous pictures they have painted. However, the personal counter we **can** provide is this: – The appellants “experts” know nothing about living in this village, its beauty, its history, its wildlife or the problems that come with living here. It is my opinion that the **lived experience** of the villagers should hold the greatest weight in assessing this site. Our experience of living in Minster Lovell, using its services, driving its roads, is **far more accurate** than any claim made by Catesby or its supposed experts, and should carry the most weight when reviewing the infrastructure of the area.

In my closing speech, I’m going to refer to a number of phrases used by the appellant and highlight how inaccurate they are.

Transport

With regard to public transport in the village, the term 'hop-on, hop-off' was used to describe our bus service. This absolutely does not exist. One can 'hop on' to a bus if they are willing to wait up to an hour for the service. They also stop at 6 o'clock, so no busses to 'hop on' to if you want to head to Witney in the evening. As for connecting to Oxford, the A40 is jammed almost all day.

There was much talk of being able to walk from the proposed development to the services in Minster Lovell – we know people from the Bovis homes estate who use cars for short trips to the shops and village hall, and yet they are closer to the village than the proposed site is. Rather than making assumptions that people 'will walk' from the proposed development, maybe it would be a better idea if a survey was taken from the Bovis estate to find out what the level of car usage actually is. There is already a high level of pollution in the centre of Witney, as reported in local news, and there will be a significant increase in pollution from this development.

The transport 'expert' said the Burford Road was a 'low speed, low traffic area', although he did not provide any data to prove this. Our experience is that it is a high speed road - with a 60mph speed limit to be exact, as I'm sure you will have noticed on your site visit yesterday – and a high traffic area, as a gateway from Witney to Burford and the Cotswolds. I often have to wait for 10 or 12 cars to get out of my driveway on the same road. This same expert also blamed accidents on the road on driver error – but again failed to provide any data to support this. Perhaps it's more likely because it is a high speed, high traffic road with low visibility. In their 2022 report, the Oxfordshire County Council originally said the road was not safe – but then changed their mind – although no reason was given as to why.

The appellant's have promised footpaths and cycle paths on the South edge of the site, but we all know developers always paint a rosy picture which hardly ever happens in reality. Southern News on Monday morning just this week, reported on a development in Didcot where the promised footpaths had not been delivered. Bovis took 4 years to put theirs in, and

it's only a dirt path which puddles in the rain – not the most buggy friendly! Once permission is granted, most promises made by developers are rarely fulfilled in order to save money.

Affordable housing

The appellant believes that the need for affordable housing outweighs all; as this is one of the most expensive villages in Oxfordshire, it seems difficult to see how the houses can be affordable even with a discount. Jobs in this area mostly come from small businesses, but don't pay high wages. As Victoria said in her opening statement, few of the residents that she knows on Dovecote Park are local people. They have come from London and many other areas of the country, and even from abroad. This is **not** solving Oxfordshire's 5-year plan, but compounding problems in this area, by bringing more people in to put pressure on already struggling schools, doctors surgeries, utilities and roads.

Furthermore, the weight put on affordable houses is **not** acceptable in principle if there is landscape harm and heritage harm. Mr Wood agreed that the breach of OS2 tilts the balance against the decision.

We the villagers feel that it will do considerable harm to both the landscape and the heritage of the village, as the impact of Bovis homes has done before it, and that one should not compound that harm by building more. The appellant said that there was an acceptable level of harm when building on greenfield sites, and that it was inevitable. We feel that, with the harm done already, this is not an acceptable level of harm, and that therefore, you should be able to turn down the proposal.

Landscaping

The appellant's landscaping expert claimed that there would be little impact on the landscape, that the proposed homes would not be visible from the North, South or East, which is just not true. From the Bovis homes on the East, they will be clearly visible, and from us to the South, the same is true. The appellant's 'expert' provided carefully selected photographs in an attempt to demonstrate a lack of visibility from the North, across the area of Outstanding Natural Beauty, however, anyone walking in this area can clearly see the current Bovis estate and will also see the proposed development. From the West, they will stand out like a sore thumb, as do the Bovis homes, which is hardly the welcome sight to what is advertised as an historic village.

Their expert also claimed that it will 'soften the integration into the countryside', however this statement is not individual to this case and this development, but rather a phrase they use time and time again to advertise their company, as found across their social media platforms. A new housing estate in an historic village does not fulfil the requirement in OS2 for developments to 'protect or enhance the local landscape and the setting' as is demonstrated by the current Bovis homes development.

Wildlife

An appellant 'expert' called the proposed site an 'unremarkable' piece of land, yet, given that it is a home to a huge variety of wildlife that need our protection, it is actually, quite remarkable. Catesby claim that the promised footpaths and cycle paths on the South edge of the site would have little or no impact on vegetation or wildlife, but there are hedges and ditches where pheasants, rabbits and other wildlife live, so they will of course be affected.

In the Vicar's sermon in church this Sunday, she rightly said 'we are caretakers of this planet', yet in David Attenborough's 'Wild Isles', he states that we are the most wildlife depleted country in Europe – not something to be proud of! The housing minister, Micheal Gove himself, said he was against the development of greenfield sites, and we should be focusing on utilising brownfield sites to combat the housing crisis.

We criticise countries such as Brazil for destroying the rainforest, but we are doing the same when we don't take care of our precious land. Looked at from space, this world is so fragile, the only place in the universe with life. We do need to give it care.

Heritage

The appellant's claim that the proposed development will 'respect the village character' in line with policy OS2, is hard to imagine given that it will be a modern housing estate, attached to an historic village. The main village as we see it now, is based around the original chartist village of 1847, and, with a few exceptions, the expansion of the village so far, **excluding** Dovecote, has not altered the feel of the original village.

I hope you enjoyed walk down Brize Norton road, picking out the original houses distinguished by their characteristic plaques. The village has strong historical significance including a 14th century church, 15th century pub and a connection to Richard the 3rd. This history draws tourists from around the world. It is hard to imagine what foreign visitors think of our historic village if they're coming from Burford, most likely as it is also a popular historic town for tourists, and see modern housing development as their first sight.

According to OS2, 'All development should form a logical complement to the existing scale and pattern of development and/or the character of the area'. Furthermore 'All development should conserve and enhance the natural, historical and built environment' How does attaching a modern housing estate to a chartist village fulfil either of these requirements?

Utilities

You may have seen yesterday in your trip around the village, there is another impending road closure in Minster Lovell. This is just another of many road closures we have had in the last few months/years, no doubt to deal with yet another water leak. The last water leak resulted in traffic lights on the road for over two months causing large traffic jams and delays on this busy road. The problems just continue, compounded by the housing development. Villagers are often without water, as already stated, having to keep bottles topped up all the time for emergency use. We have also had many electricity cuts, another one only last week.

More importantly is the sewage problem; you may have been to Brize Norton yesterday and seen a tanker pumping out sewage. That was necessary after one day of drizzle in an otherwise dry week. The weekend before this enquiry started, we had heavy rain which required 6 tankers on Monday, and 5 were still there on Wednesday. The system is unable to cope now, it cannot take any more. As stated yesterday, the sewage system currently supporting Minster Lovell is old and narrow and will need replacing if put under more pressure. Given that these problems have all been enhanced since the addition of the Bovis homes estate, the strain of extra houses **will** inevitably have a *'harmful impact on the amenity of existing occupants'* which goes against policy OS2.

Limited development

The appellants call this a 'limited development'. Their barrister said that there is 'no definition for limited', 'no numerical restriction' or 'no ceiling to limited development'. The dictionary definition, for her information, is '**a few, a small number or event, restricted in size, finite, bounded**'. In no way does this 'limited' development fit this description.

The OS2 clearly states that '*All development should: Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality.*'

The Bovis development increased the original village size by close to 25%. **Cumulatively**, this proposal will increase it by nearly 50%. That **cannot** be considered 'limited'.

Policy OS2 states that a 'limited development' in a village '*would help to maintain the vitality of these communities*', and the appellant claims that their proposed development will fulfil this requirement. The village has yet to assimilate the residents of Dovecote, as expressed so eloquently by Victoria, who said she and other residents feel isolated and that they have been unable to get their children into the local school. If this is the case with the current development, how then, can any future residents integrate by mingling on the school playground, if their children can't even get a space? While Minster Lovell village has its own community facebook page, Dovecote Park has a separate one. This lack of integration certainly does not maintain the vitality of the community.

If the village isn't coping with the residents of the first development, how will it cope with a second? The proposal is based on flawed assumptions, and not the reality that we see and experience in the village.

Deliverability

A significant part of Catesbsy's argument to grant planning permission relies on the fact that this development will help with a 5-year housing plan. However, it is their own admission that these houses CANNOT be occupied until Thames Water can provide adequate water supply and waste management. Given that Thames Water are **already** struggling to cope with the existing village size, and cannot guarantee a timescale to providing such solutions, it seems completely against common sense to allow houses to be built where there is no foreseeable timescale regarding when they can or will be occupied. Whilst they may be delivering houses, how are they helpful to anyone if they cannot be occupied?

This week we have heard about other sites which have already been given planning permission by the WODC, presumably as they are more suitable sites for development. If the appellant claims that **these** are not deliverable as part of the 5-year plan, what makes them think that this site will be deliverable in 5-years, especially as there are other factors influencing its deliverability, including the timescale of wastewater solutions and a covenant on the land?

Summary:

When planning permission was granted for the new Bovis homes estate, Minster Lovell was told that we would have “done our bit” with regards to building new homes, however here we are opposing yet another development.

The WODC may be behind on their 5-year housing plan, but granting planning permission in the **wrong** place, simply to fulfil a 5-year plan, is the **wrong** decision. Common sense and indeed policy OS2 dictates that development should be located in the right places. **This is not the right place.**

In summary, as experts in the “lived experience” of Minster Lovell, we know that ANOTHER new development will be detrimental to the village. The limited amenities in our small village are already stretched, and this development will certainly not be sustainable. It will not integrate with the village, both in terms of landscape and in terms of the people who may occupy these new houses, who are likely to feel isolated and unable to participate in village life. It would be absolutely the correct decision to **REFUSE** this development.

