

Vale of White Horse District Council Local Plan 2031 Part Two: Vale of White Horse Liberal Democrat Group Comments

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The Liberal Democrat Group on the Vale District Council represents communities across the Vale that will be impacted by Local Plan Part 2. We have an excellent understanding of the concerns with Part 2 of the plan as submitted and are requesting some **modifications**, so **we would like to be invited to take part in the Oral Examination in Public**.

We believe the Vale Local Plan Part 2 is currently **NOT SOUND** and **NOT COMPLIANT WITH THE DUTY TO COOPERATE**.

1. Housing allocations in Local Plan Part 2 must be based on evidenced need using the latest and most accurate available formula – not the now outdated SHMA figures.

- a. The government's housing white paper 'Planning for the right homes in the right places' published in September 2017 sets out a new formula for calculating the number of homes needed in each district – and the numbers for Oxfordshire are lower using this new formula. The Liberal Democrat Group have argued at Council meetings and continue to argue for the Vale Local Plan Part 2 to take account of the new assessed housing need figures.
- b. Using the new government formula both Vale's assessed need and Oxford City's assessed need have dropped sharply: Oxford's need is down from 1200-1600 per year to 746 and Vale is down from 1028 per year to 689. Therefore, Vale's share of any unmet Oxford need has either disappeared or dropped sharply and it is likely that the Vale has already identified more than enough sites in the Part 1 plan to cover their own need, five-year supply and any Oxford unmet need.
- c. If the purpose of Part 2 is to allocate housing sites to help meet Oxford's unmet need, using the new government formula, this need has already been met through Part 1. Therefore, **allocating additional sites in the Vale is unnecessary, and the plan is unsound**.
- d. Oxford City's Local Plan has not yet been submitted to the Planning Inspector. Therefore, we do not yet have confirmed figures for Oxford's unmet housing need. Producing the Vale Local Plan Part two – to allocate sites to contribute to Oxford's unmet need – without knowing what Oxford's unmet need will be and how many sites they will be allocating within the City boundary is premature. As a result, **Part 2 of the Vale plan is not based on accurate housing need figures so is unsound**. The Vale Plan should be paused until the Oxford City plan has been adopted and we know what the unmet need is – if any.

2. Land safeguarded in Sunningwell for two new bus and cycle roads must be removed from the plan (Core Policy 12, page 42 of the Plan and page 32 of Appendix B)

- a. The Map on page 32 of the appendices, safeguarding two new bus and cycle roads between Sunningwell Village and the land safeguarded for a Park and Ride at Lodge Hill, was produced by a Vale Planning Officer without input or support from the Highways authority and there is no sound justification for these two new roads and they should be removed from the plan.

- b. The map showing the new roads was first presented at the Scrutiny committee meeting that considered the draft Part 2 documents on 26th October 2017. The highways authority was not aware of the plan until a LibDem Councillor asked them about it on 27th October. By producing Safeguarding Map (pages) without consulting Oxfordshire County Council/Highways Authority, affected land owners, Sunningwell Parish Council, bus companies or cycling groups **the Vale has failed in its 'duty to cooperate' with key stake holders.**
- c. The route shown on this map does not follow the line of the landscape, cuts across farm land, goes across one resident's front garden, and the driveway for a property that has just been granted planning permission. This route, which goes right to the brow of a hill, would damage the landscape surrounding Abingdon – in contradiction with 'Purpose 4' of the Green Belt around Dalton Barracks in the Vale's own 'Green Belt Study – Land Surrounding Dalton Barracks, Feb 2017' which is to protect the landscape around historic towns. The Vale commissioned study states on page 18 that "Abingdon is located to the south-east of the study area and is also considered to be a historic town within this Green Belt Study" http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=786045889&CODE=5218C05E2F1C96AA612A5BE6847C8B07
- d. If a cycle route from Dalton Barracks to Lodge Hill was required, the preferred route would be via the North Abingdon housing development (Strategic site allocated in Local Plan Part 1 that has already been granted outline planning permission). The North Abingdon development includes good cycle routes north and will also provide a link to Radley Rail station. This cycle route would be flatter and overlooked by houses and shops so would be preferred by cyclists.
- e. Sending buses along these two additional routes could undermine the viability of local bus services on existing routes and would hamper the County Council's efforts to encourage commuters to use the very well served Oxford Road route into Oxford and the number 4 service through Wootton.
- f. Building these unnecessary additional bus and cycle lanes would be costly and divert funding away from other transport projects that are justified and have a sound evidence base. County Council officers have confirmed they have no intention to deliver these two roads so **there is no sound argument for the land being safeguarded in the Part 2 Plan.**

3. Local Transport Infrastructure for Dalton Barracks site is not Sufficient (Policy 2, paragraphs 2.81 and 2.82, page 40 of the Plan and page 15 of the appendices)

- a. The plan uses the Park and Ride at Lodge Hill (which is identified as a possible site for Park and Ride in the County Council's Local Transport Plan 4) as justification for additional housing at Dalton Barracks. However, the use of Lodge Hill Park and Ride to facilitate housing growth at Dalton barracks is contrary to advice from the County Council as Highways Authority and therefore makes the plan unsound and demonstrates a lack of cooperation with the key stakeholder in relation to transport planning.
- b. The Park and Ride at Lodge Hill cannot be used to service residents at Dalton Barracks for these reasons:
 - i. County Highways Officers have confirmed the earliest a Park and Ride here could possibly be built is 2026 – after the homes at Dalton Barracks would be built. Therefore, local bus services will be required to make the Dalton Barracks site sustainable from the outset.
 - ii. The Park and Ride at Lodge Hill may never happen. There is no funding allocated, or bids that have been applied for. Before the end of the Local Plan period it is possible that Local Transport Plan 5 will review and change the Park and Ride locations.
 - iii. If people from Dalton Barracks were encouraged to use a Park and Ride at Lodge Hill this would result in an increase in short car journeys along the Dunmore

Road, which is contradictory to the County Council's aims to reduce traffic on the Dunmore Road as the 1150 new homes are built here (sites allocated in Local Plan Part 1).

- iv. Encouraging people from Dalton Barracks to use Park and Ride from Lodge Hill would undermine the viability of local bus services which could take residents directly from Dalton Barracks into Oxford.
- c. The Local Transport offer from Dalton Barracks needs to be strengthened. The enhancement of local bus routes (such as the 4) is essential to make the Dalton Barracks site sustainable and this should be made clearer in Local Plan Part 2.
- d. While the County Council's Local Transport Plan 4 currently includes a Park and Ride at Lodge Hill, this may change when the plan is reviewed. With new housing developments and employment sites around the county it is possible that the Marcham interchange could become a more appropriate site for a Park and Ride to serve the residents of the new Dalton Barracks development – both in terms of public transport viability, journey times and impact on the Abingdon Air Quality Management Area. We call for a review and public consultation about the sites suggested in the County's Park and Ride Strategy with a view to changing some of the sites to take account of development.

4. There is no justification for removing Green Belt Status from the village of Shippon

- a. The village of Shippon should retain its washed over green belt status. Paragraph 2.74 says that Shippon will be part of a new continuous settlement at Dalton Barracks, but the village of Shippon contains within it spaces that could be developed if they did not continue to have green belt protection. Development within these spaces would have a detrimental impact on this historic village and the Part 2 plan does not put forward clear reasons why the village of Shippon should not remain in the green belt.
- b. The area along Wootton Road known as Whitecross will retain its green belt status – which we support – but there is no justification for treating the village of Shippon differently from Whitecross. **Removing Shippon's Green Belt protection is unnecessary and therefore unsound.**
- c. We support the proposal for the Western side of the Dalton Barracks site, that is planned to be used as a country park, to retain its green belt status to provide ongoing protection for this green space as currently suggested by the Plan.

5. The 90 Homes at Marcham will have a negative impact on congestion and the AQMA therefore should be removed from the plan

- a. An earlier draft of Part 2 had 410 homes allocated at Marcham. Planning officers explained that the 410 homes were removed from the plan because more housing here would have a significant impact on congestion and the AQMA at Marcham. We agree that any increase in traffic here will have a negative impact on the AQMA and that these same arguments can be used against putting 90 homes at this location at the end of Packhorse Lane. The allocation of 90 homes (shown on page 21 of the Appendices document) should also be removed from the plan

6. The title 'Dalton Barracks' is not accurate

- a. The site referred to throughout the Part 2 document as 'Dalton Barracks' also includes the Air Field currently owned by the MOD. The term Barracks is understood by many as the land 'behind the line'. Therefore, the description of this development site in the current version of Local Plan Part 2 is inaccurate.
- b. We request that all references to 'Dalton Barracks' should be changed to 'Dalton Barracks and Airfield' through the plan.
- c. There is some confusion about whether the hundreds of houses that are currently on the Dalton Barracks site and owned by the MOD are included in the housing allocation for this site, and how they have been taken in to account in terms of transport and other

infrastructure implications. There is a lack of clarity in the plan about the future of these houses.

7. The Vale Local Plan Part 2 does not include much needed policies for Electric Vehicle Charging Points

- a. National and local government initiatives to reduce the number of petrol and diesel vehicles and increase the use of electric vehicles are very welcome, but these initiatives will only be successful if Local Planning Authorities ensure that charging points and suitable electricity supplies are provided as part of development.
- b. Part 2 should include a policy ensuring all housing, industrial and retail developments in the Vale include facilities to support the take up of electric and/or low-emission vehicles, particularly where air quality issues in the area have been identified.

8. The Vale Local Plan Part 2 does not include much needed policies to increase the number of affordable homes

- a. The Vale currently requires developers to provide 35% affordable homes on new build developments. Oxford City Council requires 50% and West Oxfordshire requires 40%. Given that the additional housing sites are specifically to meet Oxford's unmet need, we should require the sites allocated in the Vale Local Plan Part 2 to provide 50% affordable homes.
- b. Local Plan Part 2 provides an opportunity to review the Vale's policy of affordable housing. The Liberal Democrat group would like proportion of affordable homes (as defined by the Department for Communities and Local Government) on all developments across the Vale to be raised to 50%. The average house prices in the Vale is 11 times the average salary and a shortage of public sector and other workers who can afford to live in the Vale is impacting on our communities and traffic congestion.

In Summary, we request the following modifications to Local Plan Part 2:

1. a) The housing need targets for Oxfordshire's unmet need should be reviewed before this plan is adopted considering the Government's housing white paper 'Planning for the right homes in the right places'
b) The Vale plan should be paused until the Oxford City Local Plan is adopted and we are clear what their unmet housing need figure is.
2. The safeguarded land for bus and cycle routes in Sunningwell should be removed from the plan (Core Policy 12, appendix B, page 32)
3. References to Dalton Barracks being serviced by a Park and Ride at Lodge Hill should be removed from the plan ((Policy 2, paragraphs 2.81 and 2.82, page 40 of the Plan and page 15 of the appendices)
4. Green Belt status to be retained for the parts of Dalton Barracks that will be used as a country park and for the existing village of Shippon
5. The 90 Homes at Marcham will have a negative impact on congestion and the AQMA therefore should be removed from the plan
6. References to 'Dalton Barracks' should be changed to 'Dalton Barracks and Airfield' through the plan
7. An Electric Vehicle Charging Point policy for the Vale should be included
8. a) The housing sites identified in Part 2 to help meet Oxford unmet need should provide 50% affordable homes (as per the Oxford City policy)
b) A new affordable housing policy should be included, to increase the proportion of affordable homes delivered across the Vale