

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO VALE OF WHITE HORSE LOCAL PLAN PART 2 PROPOSED MAIN MODIFICATIONS AND EVIDENCE

Comments close 1st April 2019

Covering Comments

Oxfordshire County Council largely supports the Vale of White Horse Local Plan Part 2 (LPP2) as proposed to be modified. In many cases the proposed modifications address matters which we raised in our comments of November 2017 and hearing statements of June 2018.

Transport Evidence

1. Oxfordshire County Council is concerned that the Additional Transport Evidence provided is presented without the supporting letter to the Inspector dated 30th November 2018. Although this letter is still available to view online, it is presented separately on the Examination page. In particular, this letter is important because it sets out a critical caveat to the contents of the Additional Transport Evidence. This states that:
'Oxfordshire County Council, in their capacity as Highways Authority, have reviewed the Transport Delivery Report and is content this additional information, along with the information already submitted, is sufficient and proportionate to inform the allocation of 1,200 dwellings at Dalton Barracks within the plan period up to 2031. This does not prejudice the County Council's responsibilities in responding to any future planning application.' Both Oxfordshire County Council and Vale of White Horse District Council 'recognise that further transport planning assessment will be required to support a future planning application at Dalton Barracks'.
2. We feel that it is necessary to reiterate the point above, as the Transport Delivery Report does not provide a conclusive summary of transport-related issues.

Housing Trajectory

3. An amendment to the housing trajectory was provided to the Inspector in August 2018 setting out that initial completions for the East of Kingston Bagpuize site would be in 2024/25. This followed an earlier update in February 2018 setting out that initial completions for the Dalton Barracks site would also be in 2024/25. These detailed housing trajectories do not appear in the Local Plan itself. We support these latest housing trajectories, which reflect the requirement in the

modifications (MM27 and MM28) for no occupations prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council.

Air Quality Evidence

4. The County Council is concerned about the effects of development on air quality. The Air Quality Management Areas in the report: Marcham, Abingdon and Botley, are of particular concern.
5. The traffic flows on which the assessment in the Additional Air Quality Evidence has been based were not agreed with Oxfordshire County Council prior to the production of the report. Although it is acknowledged that some initial distribution parameters were agreed with county council officers for the purposes of the provision of the aforementioned Transport Delivery Report, the assignment of this distribution onto the surrounding network was not agreed. Therefore, the County Council is unable to comment on the acceptability of the assignment exercise undertaken by Glanville and consequently the AADT data provided by Glanville as referred to on page 1 of the Executive Summary and shown in Table 2.3 on page 9 (Marcham AQMA), Table 3.4 on page 16 (Abingdon AQMA), and Table 4.3 on page 21 (Botley AQMA) of the report produced by SLR.
6. Further to this, the report states that estimated traffic flow data for some of the allocated housing sites utilised in the assessment described above is taken from the RPS report that was appended to the Note for Inspector re: Cumulative Impact of Air Quality (22 August 2018). The RPS report states that this traffic flow data was provided by Vale of White Horse District Council. The estimated daily traffic flows through the Marcham AQMA are provided in Table 1.2 of the document. Although county council officers are unaware as to how this information was derived, we trust that this information will have been based on the best information available at the time. However, as a result, the County Council is unable to come to an informed view on the findings of either of the air quality assessments.
7. The County Council will insist, in line with the requirements outlined in Development Policy 26: Air Quality in the draft Local Plan, that any subsequent planning applications are supported by appropriate air quality impact modelling assessments based upon the increased and cumulative traffic volumes (to be agreed with the County Council) and, that both County and District councils will adhere to their own policy along with national policy and legislation in relation to development transport impacts upon the existing AQMAs. It is noted that this accords with the Executive Summary of the SLR report, in which it states:
v. Potential air quality impacts will also be considered in detail at planning application stage in accordance with Development Policy 26 and national guidance. DP26 provides a comprehensive framework for considering air quality impacts.
8. Page 11 of the Air Quality Evidence notes that a Marcham Bypass would fundamentally alter the current road network. Safeguarding for a Marcham Bypass is included in LPP2 (Appendix B – no modifications). We stated in our evidence in June 2018 that: ‘the proposal to safeguard land for a Marcham by-

pass is justified, it being necessary to ensure that alternative ways of addressing traffic in this location are not compromised given increasing levels of traffic, and the need to improve air quality (as stated in our Regulation 19 response paragraphs 57 to 59)'. The various alternative ways of addressing traffic in this location will be investigated at the same time as investigations into the Frilford Junction improvements which are identified in the modifications as being necessary prior to development at Dalton Barracks and Kingston Bagpuize (MM27 and MM28). At this stage, no commitment to constructing a Marcham Bypass has been made, but we are confident that the effects of development at Dalton Barracks and Kingston Bagpuize will be able to be mitigated through appropriate schemes resulting from the investigative work.

Main Modifications

9. MM1 concerns supporting text on meeting the needs of Gypsies, Travellers and Travelling Showpeople. The amended text is supported.
10. MM2 sets out the revised housing numbers across the District. The 2,200 dwellings for Oxford City are to be provided between 2019-2031 for 5-year housing land supply purposes, increasing the annual requirement by 183 per annum for that period. Other clarifications are included, the substance of which we deal with later. The amended text is supported.
11. MM3 revises housing numbers in the Abingdon-on-Thames and Oxford Fringe Sub-Area. Dalton Barracks is allocated for around 1,200 homes. The County Council raised issues in its November 2017 response and in its hearing statements given that there had been no strategic transport modelling for a higher number than 1,200. We sought that the full capacity of the site be identified in the Local Plan Part 2, and that capacity be tested on the highway network unless there is some mechanism to restrict planning applications. We accept that with the reduced area and the number set at 1,200, the capacity has been tested. We therefore have no comment.
12. MM4 requires a comprehensive approach to masterplanning at Dalton Barracks. Country park requirements are changed to an area of parkland reflective of the reduced area allocated. Paragraph 2.64 is amended to include text that the County Council specifically requested concerning the requirement that all phases of development contribute to infrastructure. The amended text is supported.
13. MM5 relates to the Green Belt changes affecting Dalton Barracks. We have no comment.
14. MM6 refers to safeguarding an upgraded footpath between Shippon and Abingdon-on-Thames. We requested this safeguarding and support the modification. There is also the deletion of text as it is no longer proposed to safeguard a bus and cycle link between Dalton Barracks and Lodge Hill. We requested this deletion and support the modification.

- 15.MM7 updates text relating to the Thames Water Resources Management Plan and includes text that the reservoir safeguarding shall end if there is no prospect of the scheme being built. The amended text is supported.
- 16.MM8 revises housing numbers in the South East Vale Sub-Area, deleting the allocation for 1,000 houses at Harwell Campus and stating that the allocation for 400 houses at North-West Grove will facilitate comprehensive masterplanning. The County Council notes that the Inspector has advised that the allocation at Harwell Campus should be deleted on the basis that it 'is not justified by the available evidence'. The County Council is not seeking to provide any other evidence, given that the District Council has accepted this (Cabinet 1st February and Council 13th February 2019) to enable the plan to progress. The County Council supports the reference to comprehensive masterplanning at Grove.
- 17.MM9 deletes text relating to the allocation for 1,000 houses at Harwell Campus. A requirement for a comprehensive development framework at the Campus remains. We have no comment.
- 18.MM10 amends text relating to the North-West Grove allocation and requires a comprehensive development framework approach that will be adopted as a Supplementary Planning Document. The new text is supported, particularly as it refers to the need to consider infrastructure. In our evidence for the Matter 6 hearing on 4th September 2018, we set out our suggested text for Core Policy 5c and we are pleased to see that our requests have been largely taken on board. It may be noted that we requested that the text set out the full capacity of the site beyond 2031 and this has aspect has not been followed – however it appears that the comprehensive development framework requirement will allow for that issue to also be resolved. If the Inspector considers that further amendments are required to the text, then we would ask that reference be made to our evidence. Overall, we support the amended text.
- 19.MM11 provides for an additional scheme to be safeguarded – Cinder Track Cycle Improvements. We requested this safeguarding between Steventon and Milton Park and therefore support the modification.
- 20.MM12 provides for an additional area to be safeguarded as a possible alternative location for a new Grove Station. All options will be thoroughly considered and we therefore have no comment on this modification.
- 21.MM13 revises housing numbers in the Western Vale Sub-Area. The changes are not significant because there are no allocations in Local Plan Part 2 for this area. We therefore have no comment on this modification.
- 22.MM14 to MM22 relate to development policies which the County Council has no specific interest in. We therefore have no comment on these modifications.
- 23.MM23 relates to a development policy on archaeology. We support the improved text.

- 24.MM24 provides for a Health Impact Assessment requirement. We support this modification.
- 25.MM25 to MM26 are consequential amendments.
- 26.MM27 amends the site development template for Dalton Barracks. We generally support this modification, particularly the text relating to comprehensive masterplanning and the requirement that the occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction unless an alternative phasing plan is agreed with the County Council. A consequence of the reduced allocation size is that a secondary school is no longer proposed on the site. Text is therefore amended to refer instead to seeking contributions for 'appropriate secondary school provision for the area in Abingdon-on-Thames'. We cannot at this stage guarantee that the appropriate location for additional secondary school provision will be Abingdon-on-Thames although the suggestion is logical and therefore we do not object to this text.
- 27.MM28 amends the site development template for East of Kingston Bagpuize with Southmoor (within Fyfield and Tubney Parish). As with Dalton Barracks, we support this modification, particularly the text requirement relating to Frilford Junction. We also support the requirement for a new local centre adjacent to the proposed primary school.
- 28.MM29 is an appendix showing local shopping centres which the County Council has no comment on.

Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications Representation Form

Please return by 5pm on Monday 1 April 2019 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@whitehorsedc.gov.uk

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

☐

Agent

☒

Business or organisation

☐

Individual

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title

Mrs

Full Name

Susan

Job Title (where relevant)

Halliwell

Organisation

Oxfordshire County Council

(where relevant)

Address Line 1

County Hall

Address Line 2

New Road

Address Line 3

Oxford

Postal Town

Postcode

OX1 1ND

Telephone Number

Email Address

[Redacted Email Address]

Part B – Please use a separate sheet for each representation

The Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications includes a series of changes to the published Local Plan. These suggested modifications have been recommended by the Planning Inspector and are considered necessary for the plan to be found sound.

The documents below are therefore being consulted on for a period of six weeks:

- Schedule of Proposed Draft Main Modifications
- Schedule of Draft Maps and Figures
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Statement re Proposed Draft Main Modifications
- Additional Air Quality Evidence
- Additional Transport Evidence

Please provide the relevant modification number or document to which your comment relates:

Proposed Modification Number /
Document:


See attached

Please provide your comments below:

See Attached

(Continue on page 4 if necessary)

Signature:


(this can be electronic)

Date:

28 March 2019

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who will act as a point of contact between the Council, Planning Inspector and respondents. This means that you will be contacted by the Programme Officer (and where necessary the Council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the Planning Inspector and Programme Officer will be kept securely and not used for any other purpose. They will retain the data up to six months after the plan has been adopted. Vale of White Horse District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website, including contact details. If you would like to know more about how we use and store your data, please visit:

www.whitehorsedc.gov.uk/dataprotection

Future contact preferences

As explained above, in line with statutory regulations, you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. Vale of White Horse and South Oxfordshire District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for Vale of White Horse ☐
- I would also like to be added to the database to receive planning policy updates for South Oxfordshire ☐

Alternative formats of this form are available on request. Please email planning.policy@whitehorsedc.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form by 5pm on Monday 1 April 2019 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@whitehorsedc.gov.uk.