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Planning Policy Vale of White Horse District Council 135 Eastern Avenue Milton Park Abingdon OX14 4SB

Date: 21/11/2017

Our Ref:

Please ask for: Giles Hughes Telephone: 01993 861000

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Dear Adrian Duffield

<u>Vale of White Horse Local Plan 2031 Part 2 – Detailed Policies and Additional Sites – West</u> Oxfordshire District Council Comments

I write setting out a response from West Oxfordshire District Council to your Regulation 19 consultation on the Vale of White Horse Local Plan Part 2. Thank you for consulting West Oxfordshire on this important document.

West Oxfordshire District Council strongly supports the positive steps being taken by the Vale of White Horse District Council to take forward the second part of its Local Plan in order to help address Oxford City's unmet housing need. The unmet housing need of Oxford City is a major strategic planning issue for Oxfordshire. It is important that all Oxfordshire local planning authorities make appropriate provision for additional housing in order to help meet this need. The Oxfordshire Growth Board apportionment figure of 2,200 dwellings for the Vale of White Horse reflects an extensive joint evidence base. West Oxfordshire District Council welcomes the approach set out in **Core Policy 4a** of the Local Plan Part 2 to adopt this apportionment figure and to add this additional housing requirement to the District's housing target.

West Oxfordshire District Council considers that the Vale of White Horse District Council has satisfied the Duty to Cooperate.

West Oxfordshire District Council has no concerns over the legal compliance of the Vale of White Horse Local Plan 2031 Part 2.

It is important that housing that is intended to contribute towards meeting Oxford City's unmet housing need is accessible to Oxford, with frequent and reliable public transport linkages. This was a key consideration of the work undertaken to agree the proposed apportionment of the unmet need. Otherwise housing sites may not serve the needs of future residents and it may place an additional strain on transport infrastructure.

Core Policy 4a of the Part 2 plan states that the agreed quantum of Oxford's unmet housing need will be met within the Abingdon-on-Thames and Oxford Fringe Sub- Area. This recognises that housing within this Sub-Area is relatively accessible to Oxford, with more frequent and reliable public transport linkages, and therefore is considered appropriate to contribute to the unmet housing needs of Oxford City. The following specific allocations within the Sub-Area are listed in **Table 2.1** as close to, or accessible to, Oxford:

- North Abingdon-on-Thames (950 homes)
- North-West Abingdon-on-Thames (200 homes)
- North-West Radley (240 homes)
- South of Kennington (270 homes)
- Dalton Barracks (1,200 homes)

However, the Part 2 plan does not ring fence any of these specific allocations for the sole purpose of addressing Oxford's unmet housing need. It would be helpful to have greater clarity on which specific housing sites within the Vale of White Horse will contribute towards Oxford's needs, as this would provide clarity on their relationship with Oxford, allow effective monitoring of delivery, and also enable affordable housing requirements to be considered through planning application processes. **This is a soundness concern**.

The high level of housing need in Oxford is largely driven by the need for affordable housing. Another strong reason for clarity on where Oxford's unmet needs are to be delivered is to allow a proper assessment of how individual sites can contribute towards this affordable housing need. The affordable housing policy for Vale of White Horse aims for 35% of larger developments to be affordable (See Para 2.24), which is below the 50% assumed in the SHMA in connection with Oxford's needs. If sites outside of Oxford in other Oxfordshire Districts, which are intended to count towards Oxford's unmet needs, do not effectively contribute towards the need for affordable housing then this may create additional pressure for development elsewhere. It also may adversely affect the ability of important employers in Oxford, such as the health sector and the Universities, to recruit and retain staff. The Local Plan Part 2 requires additional content in policies and text, perhaps in Core Policy 4a, setting out how the plan will deliver the 1,100 homes requirement for affordable housing connected with Oxford's unmet housing needs. This is a soundness concern.

The Local Plan Part 2 proposes to release sites from the Green Belt for housing development. The Growth Board work programme identified that the release of Green Belt sites is necessary to help meet Oxford City's unmet housing needs effectively. In principle, West Oxfordshire District Council supports the approach adopted in **Core Policy 8b** and **Core Policy 13a** to remove the Dalton Barracks site from the Green Belt so that it can contribute either towards Oxford City's unmet housing needs or towards the Vale of White Horse's own development needs.

Infrastructure improvements are vital to support future growth. Infrastructure issues, such as transport, need to be looked at across Local Authority boundaries as travel to work patterns often cross these boundaries. Vale of White Horse and West Oxfordshire share a common boundary along the River Thames. There are major connections between Witney and Abingdon (A415) and between Witney and Faringdon (A4095). As a consequence there is significant interaction between the economies of the two Districts. The Oxfordshire Strategic Economic Plan recognises that there will be a concentration of future economic growth in the Oxfordshire knowledge spine. The A415 provides a key connection for West Oxfordshire to this future economic growth.

Vale of White Horse is proposing significant additional allocations close to the A415 at Dalton Barracks (1,200 homes), and at Kingston Bagpuize (600 homes). Transport measures associated with these developments include an A415 Bypass at Kingston Bagpuize brought forward as part of the development there, and the safeguarding of land for a Marcham Bypass (Core Policy 12a). However, the constraint at Newbridge, caused by the crossing of the Thames will remain and there is no current suggestion of improvements at this point on the route in the Local Plan Part 2. The bridge at Newbridge dates from the 13th-century and is one of the oldest surviving bridges across the Thames. The northern span is a Grade I listed structure and the southern span is listed Grade II*. The bridge is controlled by traffic lights, not being designed to carry modern traffic, and a weight limit is imposed.

Vale of White Horse and West Oxfordshire need to work together with the County Council to address the cumulative traffic impacts from housing and economic growth, and to protect and improve the A415 route. The West Oxfordshire Local Plan acknowledges the issues at Newbridge. Additional text should be included in the Local Plan part 2 to outline the issues and to set out a commitment for Vale of White

Horse to work with West Oxfordshire and the County Council in order to investigate possible solutions for the constraint at Newbridge. **This is a soundness concern**.

I look forward to working with you as your Local Plan Part 2 moves forward. Considerable growth is planned across Oxfordshire. Infrastructure is vitally important to support this future growth and therefore it is critical that the Councils in Oxfordshire all continue to work together to join up strategic land use and transport planning in the County.

West Oxfordshire wishes to participate at the oral examination, in order that cross boundary issues are properly considered.

I hope that you find this consultation response helpful. Please let me know if you require any further information.

Yours sincerely

Giles Hughes Head of Planning and Strategic Housing

