

VALE OF WHITE HORSE LOCAL PLAN PART 1: EXAMINATION

SUBMISSION BY RADLEY PARISH COUNCIL (RPC)

MATTER 7 – SUPPORTING INFRASTRUCTURE AND SERVICES (CP7, CP12, CP17-19, CP21, AND CP33-36)

1 JANUARY 2016

7.1 Does the plan make adequate and soundly based- provision for the infrastructure and services necessary to support new development.

RPC's comment relates to Core Policy 7 and the associated *Infrastructure Delivery Plan* (IDP). The plan is in our view not soundly based in that the resources so far identified to meet infrastructure needs are insufficient for the purpose.

It appears to us that the amounts identified in VOWHDC documents as required for infrastructure are greater than the sources of funds identified to deliver them. In particular, we note that:

- i. VOWHDC paper, *Community Infrastructure Levy (CIL), Infrastructure and Funding Report, February 2015*, identifies a residual funding gap of £79m, or 21% of total assessed infrastructure, after allowing for all known sources of funding including CIL;
- ii. in the IDP, costs identified for specified projects to be met by CIL at particular sites add up to more than the amount likely to be raised by CIL from the development in question. For example, projects listed for the North West Radley site to be met from CIL add up to £2.2m, significantly more than the £1.72m which we estimate as likely to be raised through CIL¹.

From emerging work on our Neighbourhood Plan, we also consider that some of the costs identified in the IDP are insufficient for the projects identified, and that some important items have not been covered at all. For example, in relation to the North West Radley site:

- i. the IDP includes just £120k for sewage treatment works, and no sum at all for improvement of the sewers. As Radley has encountered serious problems with sewer capacity and condition in the last 2 years, this provision is most unlikely to be sufficient;
- ii. a figure of £778k is included for the expansion of Radley Primary School, an amount which is most unlikely to be sufficient to provide for the proposed doubling of the school size from half year to full year intake;
- iii. no provision is made for additional primary health care services, either in relation to this site or others.

In summary, Core Policy 7 and the supporting Infrastructure Delivery Plan are unsound in that they make inadequate financial provision to meet infrastructure needs associated with the proposed development.

¹ Assuming an average of £11,000 CIL per new dwelling for 240 new dwellings less 35% affordable housing provision on which no CIL is payable.