

FARINGDON TOWN COUNCIL

VWHDC Public Consultation 7 November - 19 December 2014

- 1. Community Infrastructure Levy Preliminary Draft Charging Schedule.**
- 2. Design Guide Review**
- 3. Vale of White Horse Local Plan 2031 Part 1**

Faringdon Town Council's comments are outlined below in respect of the above documents:

1. Community Infrastructure Levy (CIL)

CIL is a tariff-based development land tax. Once adopted it is fixed, non-negotiable and enforceable. It is based on the area of the development and is charged per square metre on the net additional area of floorspace:

- a) for a development comprising $>100 \text{ m}^2$ of new gross internal floorspace;
- b) for a development of $<100 \text{ m}^2$ of new floor space that results in the creation of one or more new buildings;
- c) the conversion of a building that is no longer in lawful use.

It is not charged on affordable housing nor buildings used for charitable purposes.

The amount payable is set at the time when planning permission is granted and is payable at within 60 days of the start of development (unlike S106 which is retrospective). Amounts $>£20,000$ can be paid in instalments.

It provides greater certainty and transparency in understanding how new developments can contribute to infrastructure in the community.

Once adopted the Neighbourhood Plan ensures that Faringdon receives 25% of the CIL, unlike the current S106 negotiations.

Changes to the use of S106 are being introduced on 6 April 2015 that will significantly alter current infrastructure practices whether the LA has adopted CIL or not.

The LA must strike a balance between meeting the infrastructure funding gap and the viability of the development. The proposed charge for Faringdon, Grove and Wantage is $£85 \text{ m}^{-2}$ for residential ($£120 \text{ m}^{-2}$ elsewhere; see the viability assessment; apparently it's not viable to charge more in Faringdon) and $£100 \text{ m}^{-2}$ for supermarkets and retail warehousing (A1) $>280 \text{ m}^2$ gross internal area.

Faringdon Town Council supports CIL.

2. Design Guide

Neighbourhood Plans can undertake their own design guide; we have made some comments on design for houses and commercial property in Faringdon in the Neighbourhood Plan.

1) Intro: It encourages developers, builders, etc. to engage with design professionals at an early stage. Its objective is to ensure that new development responds to, and enhances, the 'unique characteristics of the Vale' so that development responds to its setting including: identifying any planning designations; the character of the site and settlement where located; the constraints and opportunities. It sets out the process, including community consultation.

2) Responding to the setting: planning designations: We are not in any particular designation e.g. AONB, Green Belt, etc., but we do have listed buildings and a conservation area. Developers have to prepare a character study to establish the local context; we are in the ‘Golden Ridge and Wooded Estate Villages’ of the Corallian Ridge where traditional materials prevail (pre-railway, local materials).

There is a long list of criteria for site appraisal, but they do not include sustainability or the views of local people.

3) Establishing the structure: Faringdon is shown as an example of a ‘compact, adaptable and walkable settlement’; ironically, the supporting picture shows the Cornmarket, a traffic bottleneck and a town centre that is not adaptable because of its conservation area.

Para 3.1.7) On reducing environmental impact: refers to ‘incorporating a mix of local facilities and workspace to reduce the need to travel.’ This should be fully supported as it is not a consideration in current planning applications. Also, the concept of designing street layouts to encourage walking and cycling and to ‘create permeability’ is part of the Neighbourhood Plan.

DG23 proposes a connected network of streets to avoid culs-de-sac and tortuous routes; however, all new proposed developments in Faringdon are cul-de-sac estates.

DG27 is about ‘enclosure’, which encourages buildings rather than roads to dominate. However, this creates a ‘canyon city’ like Folly Park View and Ashmore inappropriate for a market town. We strongly support the need for houses to have front gardens and spaces to park. Currently there is too much parking of cars on roads which lead to problems with access for emergency vehicles.

Section 3, which proposes a lot of good design and environmental features should be supported with these caveats.

4) Streets and Spaces: proposes a design hierarchy of pedestrians, cyclists, specialist vehicles (waste, emergency, etc.) then other motor traffic in order of consideration priority. It proposes residential street design for a maximum traffic speed of 20 mph.

DG35 proposes that shared surfaces should be incorporated ‘where appropriate’. These have not been successful in Faringdon, because of inadequate width and inconsiderate motorists; however, **the Neighbourhood Plan enforces priority for pedestrians and cyclists on shared surfaces.**

The section on parking is architect idealistic and does not consider realities and enforcement. The proposed designs do not incorporate front gardens or drives; they promote the canyon city utopia. Garages to have gates rather than doors to encourage their use for cars rather than storage; because houses are too small to incorporate storage; apparently no one ever uses a garage as a workshop. Perhaps the design guide could advocate the use of basements. Proposals on cycle storage seem to be incompatible with the design of tiny houses.

5) Building Design: everything old was apparently good, but none of the current designs seem to incorporate any of these aspects as it seems that we only want to build estates with no facilities. The only good point was **DG65** regarding working from home and live-work units.

6) Buildings in Rural and Low Density Areas: refers to small villages and isolated dwellings; mainly common sense. However, it could include preserving the character of market towns.

7) Building Performance: government policy is that all new homes from 2016 will be carbon neutral. This section on energy/resource conservation and use should be mandatory, and not a design guide. It should be enforced for all new buildings. Attention should be paid to photovoltaics, grey water, high standard of insulation.

8) Mixed Use Centres: more to do with designing shop fronts, but not controversial.

9) Commercial Employment Areas: Good policy. Good design as stated in the Faringdon Neighbourhood Plan.

10) Household Extension: side extensions to be set back and not in line? Some good principles, but some over prescriptive.

11) Building Conversions: sound principles on the conversion of agricultural, commercial, chapels schools and churches.

Appendices: biodiversity; animal species, habitat protection; all good practice.

3. Local Plan 2031

1) Introduction

This Local Plan is mainly about developing the eastern part of the Vale and has very little of benefit for the Western Vale and Faringdon.

Core policy 1: Presumption in Favour of Sustainable Development. In accordance with the NPPF, permission will be granted unless there is a policy that says otherwise.

Core Policy 2: Co-operation on Unmet Housing Need for Oxfordshire. It proposes to co-operate with other DCs to meet the housing need defined in the SHMA, which could include taking some of Oxford City's allocation. The SHMA is flawed, but VoWHDC do not challenge it. See Section 3, Core Policy 4, below.

2) Key Challenges and Opportunities

The section on supporting economic prosperity is too focused on the Eastern Vale and Science Vale, 20 miles distant, separated by a poor transport infrastructure, and supporting a highly skilled labour sector that does not reflect the makeup of the bulk of the workforce.

Tourism is focused on the enterprise Zone, and developments in Abingdon and Botley.

Transport is focused on congestion on the A34 and does not mention the A420.

3) Spatial Vision and Strategic Objectives

Again focused on the Science Vale area with no policies to include Faringdon.

SO (Strategic Objective) 1 focuses on providing housing;

SO 2 on the needs of the community and an ageing population

Core Policy 26 states that residential dwelling houses designed for older people should be provided on strategic site allocations. However all of these in Faringdon are farthest from the town centre. The policy on lifetime homes is already in the Neighbourhood Plan.

SO 6 on developing Science Vale

SO 7 On maintaining the vitality of the Vale's town centres

SO 8 on reducing the need to travel, which contradicts SO 6 for Faringdon residents.

4) Spatial Strategy

One of this section's strands mentions allocating land for employment growth in Faringdon to provide jobs close to where people live. See Employment Land below.

Core Policy 3 Settlement Hierarchy: states that market Towns have the ability to support the most sustainable patterns of living through their **current** levels of facilities, services and employment opportunities. This is not true for Faringdon.

Smaller Villages ...any development should be modest. Great Coxwell is defined a smaller village. However, **Core Policy 4 Meeting Our Housing Needs:** 400 houses have been allocated within the Great Coxwell parish boundary, which is described as a large village. This is a paradox. The Vale can't have it both ways.

Faringdon is allocated 550 houses, 350 of which were in the 2011 LP and with which we agreed. However, the other 200, plus the 400 for Great Coxwell (that are effectively in Faringdon), give an unsustainable growth of 28% on the current tax base of 3373. This does not include the houses currently under construction and unoccupied. The 2011 census reported 3013 **occupied** dwellings; hence, Faringdon is predicted to grow by at least 43% since the last census. Abingdon, population 35,000 has an allocation of 1,000 houses ~the same number as for Faringdon.

Para 4.10 'The Local Plan 2031 Part 1 makes provision for 20,560 new homes to be delivered during the plan period (2011-31; Core Policy 4). This reflects the **Objectively Assessed Need** (sic) for the VoWHDC as identified by the SHMA for Oxfordshire'.

CPRE (Council for the Protection of Rural England) Oxfordshire's response is: ***The SHMA is unsound and unsustainable and should not be relied upon. The plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA, commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. There has been no response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.***

Faringdon Town Council supports the following proposal:

The Western Vale Villages are proposing the following wording: *We wish ourselves, or by representation from the steering group of the WVV Consortium of Parish Councils, to participate in the oral part of the examination because:*

A. There were so many uncertainties relating to the SHMA on and before 19th December 2014 that it has been impossible on the information then available to argue fully the unsoundness and unsustainability of the SHMA as presented given that the formal/final positions of the other Oxon DCs and Oxford City could not be known at that date.

B. That insofar as the A420 infrastructure is concerned, the SOCG of April 2014 presented to Mr Inspector Fox at the SBC EIP is and so far remains wholly unimplemented and inchoate and that work on a revised SOCG (Statement of Common Interest) to take account of changing conditions has been promised/undertaken/choose best verb for 2015.

Employment Land

Para 4.29 Employment land will be also be provided as part of mixed-use strategic sites at Land South of Park Rd, Faringdon.... This is the Rogers Concrete site, which is already an employment site, so it adds nothing. The only other sites mentioned are the 4&20 site, already allocated, and land north of Park Road (HCA) site.

In **Topic Paper 5 para 3.27**, referring to the *URS VoWH Employment Land Review 2013 Update including Addendum 2013*, it identifies three sites in Faringdon that ‘do not meet the criteria to satisfy the forecast demand up to 2031’. These are North of Pioneer Rd (i.e. the field alongside Southampton St next to the Willes Close Triangle), the strip of land alongside Park Rd (i.e. the Builders Ede site) and land south of the playground (i.e. the wild area between Volunteer Way and Folly Park View). **Para 3.29** mentions that the Faringdon Neighbourhood Plan has sought to retain these three sites. In fact the third site has never been considered as employment land. The URS report is based on flawed evidence and this has been explained to the VoWHDC many times, but the error in their evidence base is still perpetuated.

Retail

It is also claimed in **Topic Paper 5** that the Tesco now accommodates most of the (retail) need up to 2021. However, retail sites are identified in Abingdon.

5) Sub-Area Strategies

There are many detailed proposals for the Abingdon and Oxford Fringe Area and for the South East Vale Area. It states that ‘Wantage and Grove will be places where people are *‘proud to live and work and recognised as a vital part of the Science Vale Area.’* In contrast *‘Faringdon will continue to be a thriving market town providing an important service centre role for the surrounding rural catchment’*; apparently not quite generating the same levels of pride. It further states that *‘the quality of the public area in the centre of Faringdon will have been improved, along with the revitalisation of the shopping and tourism offer’*. Nowhere does it state what these improvements are and how they will be achieved, unlike the detail for other locations in the Vale and this needs clarification.

Figure 5a shows detail s of road improvements, **5b** of bus route improvements and **5c** of a strategic cycle network for Science Vale. There are no corresponding improvements for the Western Vale or any details on cycle routes as in the Neighbourhood Plan.

Para 5.122 states that ‘other employment sites are no longer fit for purpose and quotes the two sites above in 4.29. ‘It may be appropriate for these sites to be redeveloped in accordance with Core Policy 29 (see below).’ This is completely contrary to the Neighbourhood Plan.

Core Policy 21 refers to safeguarding of land for highway improvements on the A420, as a result of the developments on Coxwell Rd.

6) District Wide Policies

Core Policy 29 Change of Use of Existing Employment Land and Premises requires demonstration that there is no reasonable prospect of land or buildings being used for employment purposes, or unsuitable on amenity, environmental or highway safety reasons, no long term strategic requirement, or that the new use will be ancillary to existing employment purposes. The problem with this is that developers can sit on employment land and claim there is no demand for it. There should be a time limit.

Again, most of these policies are aimed at developing the South East Vale, the Abingdon and Oxford Fringe, and not the Western Vale. Although the Local Plan is meant to be all-embracing, the specific examples quoted are usually for these areas as in. improving provision for cycling along the A417 corridor between Wantage, Grove, Harwell and Didcot.