

Vale of White Horse District Council
BY EMAIL ONLY

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19th December 2014

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Please ask for: Bev Hindle

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Dear Sir/Madam,

**Vale of White Horse Local Plan Part 1 – December 2014 Publication Version
Consultation Response**

1. The county council in principle supports the Local Plan and the need to now plan for a higher level of growth across the Vale aligned to the findings of the Strategic Housing Marketing Assessment (SHMA), particularly focusing high employment and housing growth within Science Vale.
2. However, the Local Plan and growth strategy proposed overall is not sustainable longer term. It is a short-term plan focussed on dealing with the districts immediate 5 year housing land supply target. The spatial growth strategy within the Local Plan needs to be tested in the wider context as part of a comprehensive Oxfordshire review. Distributing smaller sites across the district presents difficulties in planning for infrastructure to support place making. We should be moving away from this approach and investing in bringing larger more sustainable sites forward – which the Plan only does in part.
3. The emerging pattern of development in the Vale will need to be fully integrated with proposed growth across the County as a whole in terms of infrastructure planning and delivery. The Plan could go further to set the Vale in the context of the Oxfordshire Knowledge Spine, and look at opportunities that Science Transit and East West Rail will bring through improved connectivity to other key employment locations in Oxfordshire and beyond.

Infrastructure and Services

4. The main issue for the county council is the identification, provision, funding and deliverability of infrastructure and services required to support the proposed level of growth.
5. Notwithstanding tight timescales, the county council has worked with the Vale to identify what infrastructure and service enhancements are needed to support the proposed allocations. We will continue to work proactively with the Vale as the plan progresses.
6. Where proposed sites need new or extended schools the county will need to undertake further work to demonstrate solutions are deliverable. Some sites currently may be unviable due to the small scale of housing proposed in the Plan (Radley, John Blandy, St. James in East Hanney, St. Blaise and Stanford in the Vale) and some school expansions are predicated on the need for 3rd party land which has yet to be acquired (Radley, Sutton Courtenay, John Blandy, St. James in East Hanney, St. Blaise, Shrivenham and Stanford in the Vale). Therefore the delivery of these developments is contingent on a solution being found that is deliverable within the required timeframe.
7. There is a significant reliance on third party funding to deliver the transport infrastructure, in particular, required to support the Plan. Some of that funding is already secured, but it is assumed the remainder will come from the Local Growth Fund (LGF) and contributions from developments within SODC. This presents a significant risk, we must have confidence that required supporting infrastructure will be funded and be delivered in time to support the growth planned. It is uncertain that the current approach will be sufficient to convince the Inspector that the significant risk can be mitigated.
8. The Infrastructure Development Plan (IDP) is a live document and this must be recognised. It appears to capture the main infrastructure items but not necessarily the full cost of items. It is important that regular updates are made to reflect the changing nature of infrastructure packages needed to support growth. This is especially important when considering the timing of development and speculative planning applications.
9. In general the plan appears well written and considered with well worded Policies related to affordable housing, housing mix, meeting the needs of an aging population. However, the wording proposed in the policy should be strengthened in respect of delivering specialist housing.

Unmet Need and Early Review of the Plan

10. The Plan contains a policy relating to unmet housing need across Oxfordshire (CP2), identifying that the City may not be able to accommodate the whole of its housing requirement within the plan period of 2011-2031. However it has not considered explicitly how any unmet need might be delivered and which could require a need to look at different spatial strategies. There is a need to ensure that the Plan adequately addresses the issue of collaborative working to deal with unmet housing needs. A

countywide strategic review of spatial strategy options and associated infrastructure planning is required to accommodate unmet need, the process of which has to be defined. The wording proposed in the policy should be amended to make it more explicit about the need for an Oxfordshire-wide, comprehensive approach, which integrates housing provision, employment and infrastructure across the county.

11. Should it be agreed that all or part of this growth be within the Vale, the impact and infrastructure to support that growth would need to be looked at, potentially through the context of a different spatial strategy to that proposed in the current Plan.
12. The Plan proposes either a review or a Development Plan Document to deal with unmet need *in conformity with the Spatial Strategy*. The county agrees with this proposition but would like to see flexibility in policy to allow for a different/modified spatial strategy that may be more aligned to the County overall.

Approach to allocation of additional growth

13. The county council is in principle supportive of the proposed allocation of smaller non-strategic sites (0-199 dwellings) through the Local Plan Part 2. This is on the proviso that the impact of any proposed growth on county council infrastructure is understood and that growth can be mitigated.

CIL and use of S106

14. The county council has made separate representations to the Vale's Preliminary Draft Charging Schedule a copy of this response is enclosed.

Affordable Housing, Housing Mix and Accommodating the Needs of Aging Population

15. The county council supports the revised affordable housing target of 35%. Where viability is demonstrated to be an issue the Vale have stated it will consider a number of steps to resolve the viability issues relating to infrastructure. However, Core Policy 7 should clarify that these steps would include a reassessment of affordable housing requirements as alluded to in paragraph 6.12. A lower affordable housing percentage may be appropriate on some sites to make them viable.
16. The Plan seeks a dwelling mix on new development in accordance with the SHMA. It is essential that it also includes a range of smaller dwellings to provide choice for older people looking to downsize.
17. The county council welcomes the Plan in seeking the provision of housing to meet the growing needs of older people, however, it does not set out the circumstances in which such specialist provision will be required. The County Council will work closely with the Vale to plan and deliver specialist housing where on-site care and support services are required.

Oxford Green Belt

18. Whilst the county council accepts the need for a local green belt review, it would be preferable to conduct a comprehensive countywide review which is likely to be required to meet any potential unmet need from the City. Therefore the Vale's proposed local boundary review may need to be revised as part of the countywide work expected next year.

Minerals and Waste

19. The Plan acknowledges that the county council is the determining authority for minerals and waste planning applications. However, it is not aligned fully with the county council's strategy and does not reflect the fact that it produces the Minerals and Waste Local Plan for Oxfordshire.

Safeguarded Land

20. Core Policy 14 reserves a site for a reservoir between East Hanney, Drayton and Steventon. Thames Water's alternative option (recently published) for a large storage reservoir for London is on land at Longworth¹ but the draft local plan does not reserve that site.

21. It is unclear why with the potential Longworth site is not also safeguarded within the plan. It would also be useful to clarify the Vale's policy on a combined housing and reservoir site on the safeguarded land.

Local Transport Plan

22. The Local Transport Plan 4 (LTP4), which encompasses the transport strategy for Oxford, is evolving to reflect the scale of growth across Oxfordshire. The strategy is emerging but the county council would welcome discussion in the lead up to the examination so elements which are appropriate can be included within the Plan.

23. The draft strategy (www.oxfordshire.gov.uk/oxfordtransportstrategy), which has yet to be adopted, includes proposals to expand and improve Oxford's Park & Ride system by creating an outer ring of Park & Ride sites to help meet the growth needs of the districts around the city and of the city itself. This change is designed to intercept traffic further out of the city before it reaches the Oxford ring road or the immediate approaches to it, since these sections of the road network already suffer significant traffic congestion and will be placed under increasing pressure in future.

24. Two of the proposed locations for new Park & Ride sites are within the Vale at Lodge Hill and Cumnor. No specific sites have been identified yet but the plan linked below shows indicative approximate locations.

A420 development

¹

http://www.thameswater.co.uk/tw/common/downloads/wrmp/Briefing_paper_on_options_and_assessment_updated_following_the_meeting.pdf

25. The cumulative impact of growth within the Vale and in Swindon needs to be further understood to provide the county council with confidence that growth in this area can be satisfactorily supported, transport and education is a particular concern. As many of the sites are planning applications this is currently being done through the planning system. A route based study will be conducted under LTP4.

Swindon Local Plan

26. The local plan examination and consultation on proposed main modifications has taken place. These do not change the scale of the new Eastern Villages allocation (8000) and do not include additions to the plan to refer to transport impacts outside of Swindon or the need to work in liaison with neighbouring authorities to mitigate them. The proposed main modifications only deal with local public transport services between the site and Swindon town centre rather than in the context of the strategic public transport network linking Swindon with Oxford. The Vale's plan includes a commitment to work with Swindon to overcome cross boundary issues and our consultation response urges the Inspector to reconsider these points. We are now awaiting the Inspector's report.

Site Specific Comments

27. Milton Heights - The county council objected to the previous allocation of 1400 dwellings at this site. Due to the insistence that some housing would be allocated here, an allocation of 400 was deemed acceptable in principle as it will allow the primary school to expand to 1 Form of Entry. However, the county council is yet to be convinced that the transport impacts of 400 dwellings can be mitigated.

28. North Abingdon – Growth has been allocated here in the hope it will support the delivery of south facing slips at the A34 Lodge Hill interchange. It will not be viable for the development to fully fund the scheme. There will also be other infrastructure and service improvements required in addition to this. Recent announcements relating to the A34 have confirmed there is no Highways Agency/DfT funding for such a scheme. The county council can also confirm it has no funding. As there is no guarantee of third party funding for Lodge Hill, there is a risk that development will progress without the interchange improvements if proven this is acceptable.

29. Valley Park – The scale of growth potentially coming forward through applications at Valley Park needs to be fully considered. The Plan allocates 2,550 dwellings; however, developers are working on a scheme for 4,450 dwellings. The Vale will need to be able to demonstrate that the site can absorb higher levels of housing and further work needs to be done to understand if it can be mitigated with appropriate infrastructure and services being provided. The Plan will also need to consider if allocating higher numbers here would necessitate lower numbers elsewhere in the Plan. If it is demonstrated a higher number can be delivered within the Plan period then the county council would strongly suggest less sustainable sites are removed from the plan.

30. Shrivenham – Extant permissions and this allocation will require a solution of expansion of the existing primary school on its current site or relocation elsewhere.

31. Stanford in the Vale - Recently permitted housing growth is expected to take up the already limited primary capacity. Therefore an allocation in the Local Plan would mean the school would need to be expanded to create a 1.5 form entry school. Evidence to show that an expansion of the school is feasible, or that there is another satisfactorily viable solution, is required to make the allocation of development in this location acceptable. Therefore the delivery of this site is contingent on a solution being able to be delivered within the required timeframe for the development.
32. South of East Haney – The Letcombe Brook is shown as adjoining and partly within the site. Assessment should be carried out to determine the quality of the habitats ahead of any development.
33. Extant planning applications – Live applications around the district will need to be considered in the context of the Plan allocations when planning for infrastructure. Especially at Stockham Farm (c.380 dwellings), Harwell (120 dwellings) and smaller applications at other locations such as Shrivenham, Sutton Courtenay and Stanford in the Vale.

Where the county council considers the plan to be unsound the relevant forms have been submitted. In addition more detailed comments and information is attached with this letter:

- ***Annex 1*** - Technical officer comments on the plan
- ***Annex 2*** - Comments specific to the Infrastructure Development Plan

The County Council will continue the partnership working with the Vale of White Horse District Council to try and overcome the issues raised to enable timely progression of the Local Plan.

Yours sincerely

Bev Hindle
Deputy Director Strategy & Infrastructure Planning