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CC : Wantage Deanery Pastoral & Standing committee
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Lay Chair
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18th December 2014

Dear Ms Lee,

**Vale of White Horse District Council Local Plan 2031 Update and Community Infrastructure Levy (CIL) –
Consultation comments**

I am writing to you with comments for your consultation on the Vale's Local Plan 2031, and also about the Community Infrastructure Levy Consultation.

I previously wrote to you on the Local Plan 2029 on 28th August 2013, 30th September 2013, and the Local Plan 2031 Update on 20th March 2014.

I am writing to you in a combined letter on the Local Plan 2031 Update and the Community Infrastructure Levy (CIL), as the CIL comments are integrally related the context of the Local Plan 2031.

Who we are

Wantage Deanery of Oxford Diocese comprises 12 parishes in the Wantage area, including Wantage, Vale Benefice (comprising the parishes of Grove, Hanney, Denchworth and East Challow), Ridgeway Benefice of 4 parishes to the West, and Wantage Downs Benefice of 3 parishes to the East.

These parishes contain the proposed major housing developments at Grove Airfield, Monks Farm and Crab Hill, with additional proposed strategic housing developments at East Challow and East Hanney. There are also several current medium-sized windfall developments such as the ones at Stockham Farm, Chain Hill, and 3 at the Hanneys.

Why we are commenting

The Church of England is committed to a society where all can flourish, in particular the needy and most vulnerable. It has long had concern about the poor, the most vulnerable and marginalised in our society. It is committed to the vulnerable, the disadvantaged, and all in need. We are bound to do so; this is our duty. Individuals whose lives are transformed have the potential to transform their society. The Church is committed to supporting all local communities; our parish structure reflects this commitment.

General Comments

We are already at earlier consultations submitted comments on our concern of the Unrepresented and the Voiceless. The Wantage area and especially Wantage itself has in the last few years received a whole lot of people who have been planted into the community, without any meaningful attempt to integrate them with those already there. This has been especially so at the St. Mary's and Smith's Wharf development and other very recent developments. Wantage has noticeably changed character to become a "Community in Change" with 2 portions not integrating.

We consider there is a very strong need to support communities as they go through taking on board incomers who have recently moved into the area.

Without any clearly articulated, identifiable approaches or actions to integrate incomers with those who are already there, there is almost a recipe for conflict.

The Local plan refers to "building healthy and sustainable communities". If there is the definite intention of facilitating integration, there needs to be work by the community at large to achieve this. It won't just happen - it needs viable resourcing over a minimum of 5 years to make a real difference. We have a strong interest in transforming dwelling units into homes.

What approaches, plans and resourcing are there to facilitate integration?

The Local Plan (2031 Update)

The Local Plan 2031 update does not appear to include any changes to other policies, or other aspects of the plan. We are raising our concern below about specific proposed policies.

Housing Development densities – building health and sustainable communities (core policy 23), Design Guide section 3.7.2, Strategic Objective S04

We have noted that several recently approved and completing developments, such as Stockham Farm (Downsview Road) and Chain Hill, which have very high housing densities. This high density has effectively excluded facilities being provided within the developments. In addition, the proposed development at Crab Hill also has in parts of the development a very high housing density that exceeds the proposed policy's housing density.

In Sections 6.7 and 6.8, the focus is on efficient land use, and character & legibility of housing densities, rather than on the people. People make a community.

What is the maximum density commensurate with human flourishing? What evidence is this based on?

How does the approach to housing densities align with the CABES key principle of inclusive design articulated in Design Principle DG25 of “placing people at the heart of the design process”?

Housing Mix (core policy 22)

The document refers to “seek to ensure that the right mix of housing sizes, types and tenures are provided...” . It also states that “Core policy 22 adopts a flexible approach to the implementation of housing mix.” There is so little outlined in the approach, that it is not clear what is being put forward as a policy.

How would the housing mix of any particular development be deemed to be not appropriate, and so the detriment of human flourishing? What evidence is this based on?

Facilities on new housing developments (Chapter 2, Section 2.8)

We are most interested in the services and Social (“soft”) facilities. There are already many venues in the Wantage & Grove area. In new developments, much can be achieved with provision of touchdown spaces in a community building or school, especially in the initial years of a new housing development.

The Design Guide section 3.4.1 refers to “successful public life...where people feel safe, engaged and connected with other residents.”

What approaches and plans for both “hard” (premises/facilities) and “soft” (services) are proposed for Children and Young People, the elderly, and people with disabilities?

What is considered a sufficient range of facilities and services to support these individuals?

What are the definitions of high quality services and facilities?

What approaches and plans for both “hard” (premises/facilities) and “soft” (services) are envisaged so that “successful public life” is achieved? By what criteria would “successful public life” be considered to be successful?

Building Healthy and Sustainable communities (core policy 15)

Integration of new developments with existing communities

We note the comments on the need to integrate new developments with existing communities.

What community facilities and services are proposed and how will these be viably resourced for a minimum of 5 years to achieve the stated outcome of healthy and sustainable communities?

What approaches and plans are proposed to build and develop the social infrastructure and social life, especially on major new housing developments?

Social/affordable Housing (core policy 24, section 6.12)

We have noted that the VoWHDC target is of 35% social /affordable housing on new major developments.

What is the likely level of need for community facilities and services from these individuals?

What evidence is this based on?

Is this included in plans for building healthy and sustainable communities, or will it be separately factored in?

Specialised housing and facilities for an aging population (core policy 26)

We have noted there is mention of specialised housing for an ageing population.

What proportion or quantity is proposed for such specialised housing? What approach will be adopted? Adapt-as-and-when, or build a proportion or quantity of specialised housing?

Social Environment – “Hard” and “Soft” (Chapter 2, Section 2.8)

We note the Local Plan has a very great emphasis on “hard” (premises/facilities) aspects, and very little on “soft” (services) aspects. The “soft” aspects are key to building and sustaining healthy communities.

What approaches are proposed to ensure an appropriate balance between “hard” (premises/facilities) and “soft” (services)?

The Community Infrastructure Levy

We are commenting about the proposed Community Infrastructure Levy.

Regulation 123 and elements - “Hard” and “Soft”

The elements itemised in the list do not include any aspect related to

- Building Healthy and Sustainable communities, especially the “soft” elements
- Integration of new developments with existing communities

This risks being a missed opportunity for Community Development, and Youth Work, especially for smaller developments.

The list includes “youth facilities” and “Community Halls”. Given the emphasis on “hard” and little to Social (“soft”) elements, there is a very real risk that there will be under-used halls, and under-used physical facilities. It is people, especially Community Development Workers and Youth Workers that are the catalysts for both Building Healthy and Sustainable communities, and integrating the new residents with the existing community.

How will Healthy and Sustainable Communities develop, by for example Community Development work and youth work under the Regulation 123 list?

Smaller developments, and windfall developments

There have been several smaller developments approved since 2013 across the Wantage & Grove area, and the South East Vale. Developments such as Chain Hill and Stockham Farm (Downsview Road) in Wantage, East Challow, and 3 smaller developments in the Hanneys have had S106 agreements as part of the planning consent.

The Hanneys are a very good example where several small developments together totalled at least 88 houses, with 35% to 40% being social/affordable housing.

The CIL represents a golden opportunity to provide for Community development across several smaller developments to fund the Social (“soft”) aspects of integrating these small developments with the existing community.

How will Healthy and Sustainable Communities develop and be provided for smaller and windfall developments for their Social aspects (e.g. Community Development work, youth work)?

How will the individuals moving to smaller developments be expected to integrate with existing community, and not be “fishes out of water”, especially in the more rural communities?

Infrastructure Delivery Plan

Section 1.2 itemises “hard” aspects of development, with no Social (“soft”) elements to ensure Healthy and Sustainable Communities.

Section 2.9 states that a proportion of the funds must be used “to support the development of the local area by funding”, with sub-section b stating “anything else that is concerned with addressing the demands that development places on an area.”

Is the approach indicated in Sections 2.8 and 2.9 envisaged as the route by which the Social aspects of developing Healthy and Sustainable Communities be funded? If so, how will this be ensured?

Section 13.3 itemises the contributions that OCC is seeking. Although this is all good, it does build in a “reactive” approach of awaiting for individuals in a community to get to a stage requiring intervention, even at an early stage, rather than a “proactive” approach of developing Healthy and Sustainable communities.

What balance is anticipated between “proactive” and reactive” approached to the Social aspects of developing Healthy and Sustainable Communities be funded? If so, how will this be ensured?

Proposed North Grove Monks Farm development (pages 45-46, PDF pages 45-46)

We note that there is no indicative contribution towards the Social (“soft”) aspects of development Healthy and Sustainable Communities. We note also that the plan indicates the proposed development commencing in 2017/18 and continuing to at least 2028/29. It would therefore be in the same timescales as the Grove Airfield and Crab Hill developments, both close by, as well as the proposed strategic development of Land east of the A338 at East Hanney.

What approach is anticipated for the proposed Monks Farm Development for delivering the Social aspects of developing a Healthy and Sustainable Community?

Strategic partnerships for successfully building healthy and sustainable communities

Wantage Deanery and Oxford Diocese are keen to build strategic relationships with both VoWHDC and developers on how developments are implemented. This so that the process of community building starts from the earliest stage, and becomes a reality. There is a real concern that a lack of engagement by the Council and developers risks the intent of strategic statements risk being vacuous words. As our commitment to the Wantage & Grove area, we want to form strategic relationships, and be involved in the process of successfully integrating new residents and building healthy and sustainable communities.

I am keen to take this matter forward, and would be grateful for your acknowledgement and further information to progress the following actions:

- providing the Wantage Deanery with responses to the general comments, the consultation process, and specific questions and concerns.
- building ways forward for strategic partnerships to support the successful integration of new housing developments with the existing communities.

As an important local stakeholder, Wantage Deanery would be keen to collaborate with the local authority on successfully building healthy and sustainable communities, and creation of plans and viable resourcing to achieve this aim. We consider these matters to be essential to the successful development, integration and flourishing of these new housing developments into communities.

I would be grateful for acknowledgement of this contribution to your consultation.

Yours sincerely,

Hugh Rees