



**Vale
of White Horse**
District Council

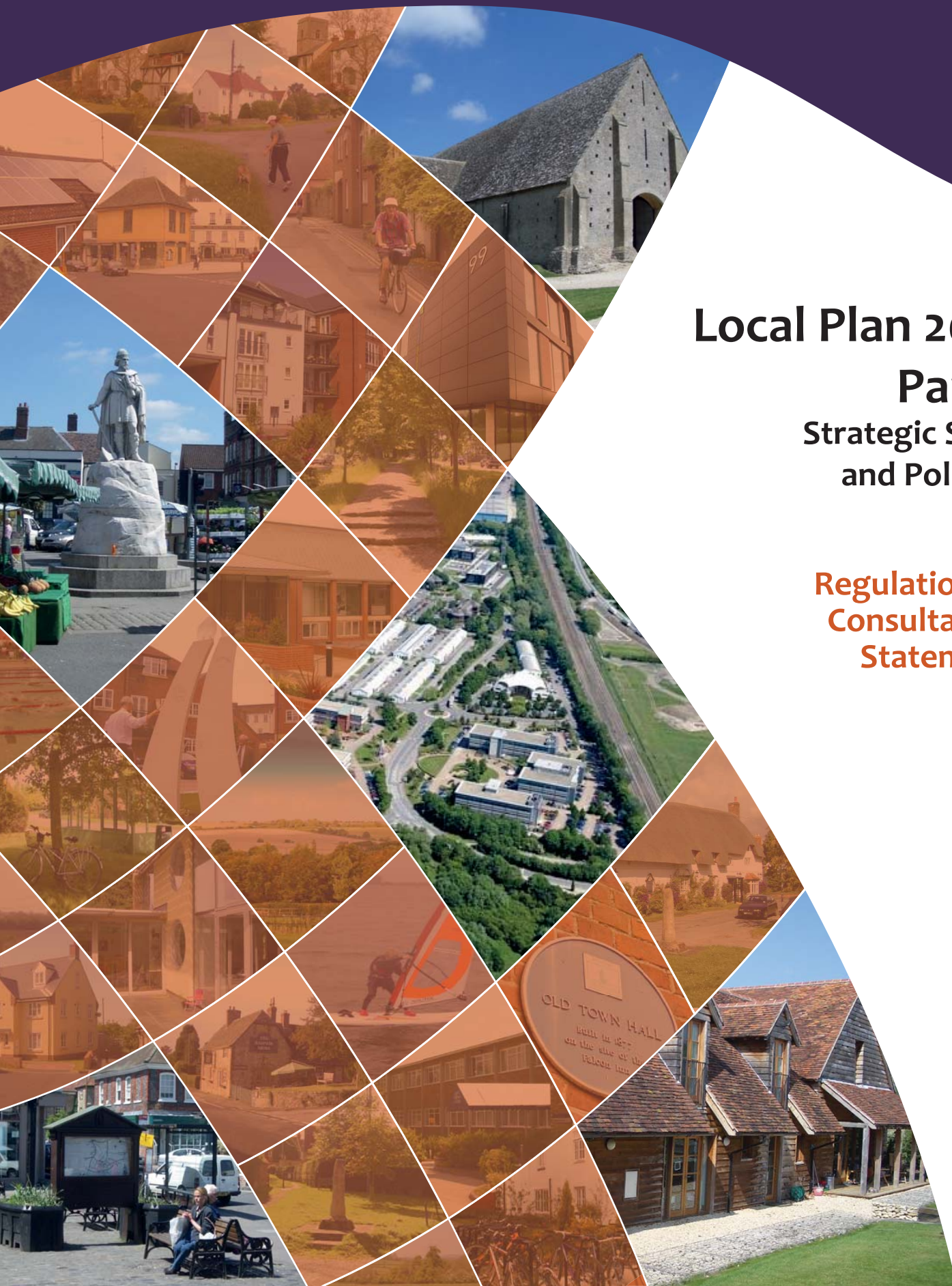
**Submission Document
March 2015**

Local Plan 2031

Part 1

Strategic Sites and Policies

**Regulation 22
Consultation
Statement**



Vale of White Horse Local Plan 2031: Part 1



Regulation 22 Statement

A report demonstrating compliance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 in regards to the following consultations undertaken by the Council in preparation of the Local Plan 2031 Part 1:

Draft Local Plan Consultation (February – May 2013)

Housing Delivery Update (February – April 2014)

Publication of Local Plan Part 1 (November – December 2014)

MARCH 2015

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SUMMARY

This Statement provides a summary of the consultation undertaken on the Vale of White Horse District Council's Local Plan 2031 Part 1 to demonstrate compliance with Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Statement details the consultation stages undertaken on the Local Plan 2031 Part 1¹, as follows:

- Draft Local Plan 2029² Part 1: Strategic Sites and Policies (28th February 2013 to 9th May 2013);
- Housing Delivery Update (21st February 2014 and 4th April 2014); and
- Publication Version of Local Plan 2031 Part 1: Strategic Sites and Policies (7th November 2014 and 19th December 2014)

The Draft Local Plan and the Housing Delivery Update consultations were undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the consultation on the Publication Version of Local Plan 2031 Part 1 were undertaken in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The various consultations have sought the views of organisations, local communities and individuals on draft planning policies and proposals intended to deliver sustainable growth for the district.

For all stages, representations could be made online using our 'Objective' consultation system or in writing. During the consultations we ran a series of exhibitions in key settlements across the district, along with conducting public workshops and leaflet drops. The exhibitions and workshops were attended by stakeholders, interest groups, statutory bodies and members of the public.

Draft Local Plan Consultation 2013

A total of 2,340 representations were made to the council by 511 different participants.

A range of issues and concerns were identified. The most prevalent included:

¹ This statement does not cover historic consultation 2007-2010 on the then-draft Core Strategy. Whilst some aspects of that earlier work have been taken forward, the local plan process effectively started again following publication of the National Planning Policy Framework and Town and Country Planning (Local Planning) (England) Regulations 2012 with a new Sustainability Appraisal Scoping Report consultation in September 2012. Legacy consultation summaries are available on request but are not longer considered relevant to the Local Plan Part One.

² The plan period has since been extended to 2031 and is referred to as the Local Plan 2031 throughout this report.

- concern about the amount of development proposed;
- concern about the stress new development would place on existing roads and infrastructure;
- concern about the impact new development would place on other infrastructure, such as schools, healthcare etc;
- support for the protection of the green belt;
- concern that housing proposed at Wantage and Grove is disproportionate to employment growth in the vicinity;
- concern that new development might result in an increased risk of flooding to new and existing properties; and
- objection to the proposed strategic site allocations due to the perceived impact development could have on the character of existing settlements.

Housing Delivery Update Consultation 2014

This generated 2,717 responses from 1,093 participants.

The main response themes were similar to the previous consultation, however selected key points of detail were:

- calls for the provision of infrastructure before development and concerns about the lack of infrastructure to support new development in terms of schools, health care facilities and sewage and water treatment works upgrades
- traffic and congestion from new development, and cumulative impact on the existing road network
- loss of Green Belt land in the Abingdon-on-Thames / Oxford Fringe Sub-Area,
- opposition to development in AONB at Harwell campus, including from Natural England, and by the AONB Management Board,
- concerns about harm to the identity and character of existing settlements including coalescence,
- Oxfordshire County Council expressed concerns about the number of homes proposed on the Milton Heights site on highways capacity and safety grounds,
- Oxford City Council objected that the local plan has not addressed Oxford City's un-met housing need identified in the up-to-date Oxfordshire SHMA, and
- English Heritage raised various concerns about heritage and conservation matters including protection for the setting of designated heritage assets

Pre-Submission Publication Version Consultation 2014

A total of 4680 comments were made to the council by 1002 different participants to the Publication Version of the Local Plan 2031 Part 1 (November – December 2014)

The main issues raised through the consultation were similar to those previous raised, however the key issues are:

- Oxford City Council objected that the local plan has not addressed Oxford City's un-met housing need and a strategic green belt review should be undertaken instead of a local green belt review;
- Questions over the accuracy of the proposed employment figure, unrealistic and much lower figure should be proposed;
- Concern over the housing target from the SHMA, as it overstates housing need, imbalance between housing and employment projections however support raised for the need to build more houses;
- Questions of the ring fenced policy as this need to justified further and how will supply be calculated;
- Infrastructure should be provided prior to development and general concerns over whether there is sufficient infrastructure proposed to support growth;
- traffic and congestion from new development, and cumulative impact on the existing road network in particular the A34;
- loss of Green Belt land in the Abingdon-on-Thames / Oxford Fringe Sub-Area;
- opposition to development in AONB at Harwell campus, including from Natural England, and by the AONB Management Board including clear justification for this allocation and thus a number of concerns raised over Core Policy 44;
- Oxfordshire County Council and Thames Water have raised a number of issues regarding sufficient infrastructure for each of the proposed sites;
- Environment Agency has raised soundness concerns regarding the approach to water efficiency; and
- English Heritage has raised a number of issues throughout the Plan to ensure the Plan sets out a positive strategy for the protection, enhancement and conservation of the setting of designated heritage assets.

Officers have reviewed all representations made on the Local Plan 2031 Part 1 from all consultations. The issues and concerns raised have been considered and incorporated into the Plan, where appropriate.

This consultation statement accompanies the Submission of the Local Plan 2031 Part 1: Strategic Sites and Policies to the Secretary of State for Communities and Local Government for independent examination.

1. Introduction

- 1.1 This Statement has been produced to provide a summary of the consultation processes for the Local Plan 2031 Part 1: Strategic Sites and Policies and the main issues arising. This Statement has been produced in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”). The Regulations state this Statement will need to set out the following:
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii) how those bodies and persons were invited to make representations under regulation 18,
 - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
 - (iv) how any representations made pursuant to regulation 18 have been taken into account;
 - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - (vi) if no representations were made in regulation 20, that no such representations were made;
- 1.2 This Statement firstly explains each of the consultation stages on the Local Plan as relates to the methods uses, the people involved and number of representations received and secondly sets out the main issues that have arisen through each stage of consultation and how these have influenced the progression of the Local Plan
- 1.3 Following the close of the 6-week public consultation and with due consideration of representations, the Local Plan 2031 Part 1: Strategic Sites and Policies was submitted to the Secretary of State for Communities and Local Government on 18th March 2015.

2. Background

- 2.1 The Local Plan 2031 for the Vale will replace the Local Plan 2011 and will be made up of a number of separate parts, the most significant include; Local Plan 2031 Part 1: Strategic Sites and Policies, Local Plan 2031 Part 2: Detailed Policies and Local Sites, Adopted Policies Map, and Science Vale Area Action Plan.
- 2.2 The Local Plan 2031 Part 1: Strategic Sites and Policies is the first Plan to be progressed. It sets out the overarching spatial strategy and strategic policies for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area and makes provision for retail, leisure and commercial development and the infrastructure needed to support them.
- 2.3 The following key stages of consultation have been undertaken on the Local Plan 2031 Part 1 since 2013:
- Draft Local Plan 2029³ Part 1: Strategic Sites and Policies (28th February 2013 to 9th May 2013);
 - Housing Delivery Update (21st February 2014 and 4th April 2014); and
 - Publication Version of Local Plan 2031 Part 1: Strategic Sites and Policies (7th November 2014 and 19th December 2014)
- 2.4 The council consulted stakeholders and the public on each of these documents to gather feedback and views on the emerging policies and proposals, which has influenced the Plan. Each of the consultation stages is explained further in the following chapters. However the respective Consultation Statements that accompanied each iteration of the Plan include in detail the consultation strategy that was undertaken for the first two stages Regulation 18 in 2013 and 2014 and demonstrate how the council has approached a wide range of stakeholders.
- 2.5 Through Plan preparation and the consultation stages, the council has worked collaboratively with organisations, local communities and individuals to ensure that its planning policies reflect a collective vision, a set of agreed priorities for the area and provided a number of opportunities for the community to present their views on the emerging Plan. The Plan has been prepared in accordance with the Council's Statement of Community Involvement (SCI) which also provides further information on the council's commitment⁴.
- 2.6 The council have provided details on how the 'duty to cooperate' has been met as required by the Localism Act 2011 and National Planning Policy Framework (2012). This has been documented within the Duty to Cooperate Topic Paper 1 that accompanied the Publication Version of the

³ The plan period has since been extended to 2031 and is referred to as the Local Plan 2031 throughout this report.

⁴ Statement of Community Involvement, Vale of White Horse District Council, December 2009

Local Plan 2031 Part 1 for consultation which has been updated for the Submission of the Local Plan. This Topic Paper summarises the evidence and processes that have helped to inform the preparation of the Local Plan 2031 Part 1.

- 2.7 The Sustainability Appraisal (SA) ensures sustainable development is promoted throughout the planning system. An SA advises the Local Plan on whether the policies proposed have a significant positive or negative effect on achieving sustainability principles and from this, the SA suggests ways in which to mitigate harmful effects and maximise the positive effects.
- 2.8 An SA has been undertaken for each iteration of the Local Plan 2031 Part 1 with respective SA Reports published alongside each Plan for consultation. This has ensured SA principles are firmly integrated into the plan from the outset and ensured the reasonable options have been considered and assessed throughout Plan preparation.
- 2.9 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. This Directive requires an HRA to be undertaken on proposed plans, which are likely to have a significant effect on one or more Natura 2000 sites either individually, or in combination with other plans or projects. The HRA process has been undertaken alongside the evolution of the Local Plan 2031 Part 1 with recommendations being taken into account in the Plan.

3. Draft Local Plan Consultation

3.1 The Draft Local Plan proposed strategic planning policies for the district; including the number of new homes and jobs that should be provided in the area up to 2029 (the plan period has since been extended to 2031). The document also set out the proposed locations for strategic development across the district. The key objectives of the Draft Local Plan included focusing housing, employment and infrastructure delivery within the Science Vale area, reinforcing the service centre roles of the main settlements across the district and seeking to protect the Vale's thriving village and rural communities.

3.2 The Consultation undertaken on the Draft Local Plan was undertaken in accordance with Regulation 18. This Statement should be read in conjunction with the Consultation Statement published in February 2014 and provides further detail on the Draft Local Plan Consultation.

Consultation Period

3.3 The Consultation on the Draft Local Plan took place between 28th February 2013 and 9th May 2013 for a period of 10 weeks. The first four weeks provided an opportunity for people to familiarise themselves with the policies and consultation document and in the final six weeks some technical studies and supporting topic papers were also released. This time period provided the public and other stakeholders a minimum of six weeks with a complete suite of documentation to respond to with an additional four weeks to view to the Draft Local Plan Documents.

3.4 The Draft Local Plan and accompanying documents were made available on the council's website to download and informed consultees that representations could be made through the council's dedicated consultation portal, Objective, which is available at: <https://consult.southandvale.gov.uk/portal/vale/planning/pol/lpp1/lpp1>. Through Objective, representations could be made to specific questions relating to the Draft Local Plan. A standard representation form was also available on the website for those who wanted to provide a written representation with details on how to submit the representation.

3.5 The Draft Local Plan, accompanying documents and representation form were made available for public inspection at the council's Offices and at all local libraries during normal office hours for the length of the consultation period. Statutory and general consultees were notified of the consultation and how to make representations either through a letter or email. A list of the people and organisations that were consulted is shown within the Consultation Statement published in February 2014 at Appendix 1. A statutory public notice was provided in the Oxford Times, The Herald, and the Swindon Advertiser.

Consultation Methods

- 3.6 To raise awareness of the consultation and increase opportunities for stakeholders and the public to provide comments, a range of consultation methods were used. The Consultation Statement published in February 2014 at Appendix 2 sets out in detail the methods used to attract interest in the consultation. This included; press releases, articles in the Local Plan Newsletter 'Vale Community'; distribution of a leaflet providing summary information; presentations; stakeholder events with town and parish councils; unstaffed and staffed exhibitions at a number of locations providing details of the consultation and how to make representations.

Consultation Responses

- 3.7 In total, 2340 formal representations were received on the Plan, by 511 different participants. Representations received covered all aspects of the Plan and the Consultation Statement published in February 2014 provides details of the main comments that were raised from the consultation process under the main policy areas and how these were taken into account. To demonstrate compliance with Regulation 22, in particular criterion (iii) and (iv), this Statement provides a summary of the main issues raised by policy area from the Draft Local Plan consultation and how consultation comments have been considered within the Plan from Chapter 6

4. Housing Delivery Consultation

- 4.1 The Draft Local Plan published in February 2013 was based on the most appropriate evidence for housing available at that time, which was the South East Plan. Subsequent to this, the housing evidence base to support the Local Plan was substantially updated, in particular through an Oxfordshire wide Strategic Housing Market Assessment (SHMA). This resulted in the Local Plan needing to be significantly updated to provide an update to the housing target and the provision of 21 new development site allocations. Also due to the allocation of new sites, the Update also sought views on new or amended policies relating to Duty to Cooperate, Oxford Green Belt, Didcot A Power Station, Design and Local Distinctiveness, and Design Briefs for Strategic and Major Sites.
- 4.2 The Consultation undertaken on the Housing Delivery Update was undertaken in accordance with Regulation 18. This Statement should be read in conjunction with the Consultation Statement published in November 2014 which provides further detail on the Housing Delivery Update Consultation.

Consultation Period

- 4.3 The Consultation on the Housing Delivery Update took place between 21st February 2014 and 4th April 2014 for a period of 6 weeks.
- 4.4 The Housing Delivery Update Document and accompany documents were made available on the council's website to download and informed consultees that representations could be made through the council's dedicated consultation portal, Objective, which is available at: <https://consult.southandvale.gov.uk/portal/vale/planning/pol/lpp1/lpp1-additional/adcon>. The standard representation form was also available on the website for those who wanted to provide a written representation with details on how to submit the representation.
- 4.5 The Housing Delivery Update, accompanying documents and representation form were made available for public inspection at the council's Offices and at all local libraries during normal office hours for the length of the consultation period. Statutory and general consultees were notified of the consultation and how to make representations either through a letter or email. A list of the people and organisations that were consulted is shown within the Consultation Statement published in November 2014 at Appendix 1. A statutory public notice was provided in the Oxford Times, The Herald, and the Swindon Advertiser.

Consultation Methods

- 4.6 Similarly to the Draft Local Plan Consultation, a range of consultation methods were used to raise awareness of the consultation and the significant changes to the Plan and increase opportunities for stakeholders and the public to provide comments. The Consultation Statement

published in November 2014 at Appendix 4 sets out in detail the methods used to attract interest in the consultation. This included; press releases on the council's website and distributed to local media outlets promoting the consultation, articles in the Local Plan Newsletter 'Vale Community'; distribution of a leaflet to libraries, town and parish councils and key stakeholders providing summary information; presentations; a number of public meetings were attended by officers; stakeholder events with town and parish councils; staffed exhibitions at a number of locations providing details of the consultation, how to make representations and opportunity to present key findings to the public to get feedback. In addition a number of duties to cooperate meetings were held with key stakeholder to discuss cross boundary matters which are and have been ongoing.

Consultation Responses

- 4.7 In total, 2,717 formal representations were received on the Plan, by 1,093 different participants. Representations received covered all aspects of the Plan and the Consultation Statement published in November 2014 provides a summary of the main comments that were raised from the consultation process under the main policy areas and how these issues were considered in the Local Plan. Again, to demonstrate compliance with Regulation 22, in particular criteria (iii) and (iv), this Statement provides a summary of the main issues raised by policy area from the Housing Delivery Update consultation and how consultation comments have been considered within the Plan from Chapter 6.

5. Consultation on Publication of Local Plan 2031 Part 1

- 5.1 The Local Plan 2031 Part 1: Strategic Sites and Policies sets out the overarching spatial strategy and strategic policies for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area and makes provision for retail, leisure and commercial development and the infrastructure needed to support them. It also includes a number of district wide policies.
- 5.2 The Plan is structured around the following:
- Presumption in Favour of Sustainable Development and Cooperation on Unmet Housing Need for Oxfordshire Core Policies which underpin the Plan;
 - Spatial Vision and Strategic Objectives focusing on four overarching key themes;
 - Spatial Strategy underpinned by five Core Policies;
 - Three Sub-Area Strategies providing spatial expression and allocating development sites; and
 - District Wide Policies reflecting to the four overarching key themes.
- 5.3 The consultation sought comments only relating to matters of soundness, as set out within the National Planning Policy Framework, as this Plan will be the version that is submitted to the Secretary of State for independent examination.
- 5.4 The Consultation undertaken on the Publication Version of Local Plan 2031 Part 1 has been undertaken in accordance with Regulation 19 and 20.

Consultation Period

- 5.5 The Consultation on the Publication Version of Local Plan 2031 Part 1 took place between 7th November 2014 and 19th December 2014 for a period of 6 weeks.
- 5.6 The council consulted on the following documents as part of the consultation: Publication Version of Local Plan 2031 Part 1: Strategic Sites and Policies; Sustainability Appraisal incorporating Strategic Environmental Assessment; Habitats Regulations Assessment; Infrastructure Delivery Plan and the Consultation Statement. A number of evidence base documents were also published including a set of Topic Papers that were produced to present a coordinated view of the evidence that were considered in drafting the Local Plan.
- 5.7 Public consultation on the Local Plan 2031 Part 1 involved the following, in accordance with the Local Planning Regulations (Local Development) (England) Regulations 2012 (Regulation 35 (1)) meeting and exceeding requirements as specified in the Statement of Community Involvement;

- the Local Plan, accompanying documents and representation form were made available at the Council Offices and at local libraries for public inspection during office hours;
- the Local Plan and accompanying documents, including the representation forms were made available on the council's website at: www.whitehorsedc.gov.uk/localplan and representations could be made online through the council's online consultation portal (Objective);
- Statutory and general consultees were notified of the consultation and how to make representations either through a letter or email. A list of consultees is provided at Appendix 1;
- A statutory public notice was provided in the Oxford Times, The Herald, and the Swindon Advertiser;
- All town and parish councils, within the District, were sent a copy of the Local Plan with representation forms to make available for inspection; and
- All households in the District were sent a summary leaflet explaining the key elements of the Plan and providing information about the consultation process

5.8 A list of all those informed of the consultation is included within Appendix 1a

Consultation Methods

5.9 Similarly to the previous consultations, a range of consultation methods were used to raise as much awareness as possible of the consultation and increase opportunities for stakeholders and the public to provide comments. Appendix 2a sets out in detail the methods used to attract interest in the consultation. This included; press releases on the council's website; distribution of a leaflet to libraries, town and parish councils, key stakeholders and all households in the District providing summary information; presentations; and a number of public meetings were attended by officers providing details of the consultation, how to make representations and opportunity to present key findings to the public to get feedback.

Consultation Responses

5.10 The formal consultation gave rise to 4,680 comments from approximately 1,002 parties. All representations are available for public inspection at the council's offices during normal office hours and can be viewed on the council's website through the council's dedicated consultation portal (Objective). To demonstrate compliance with Regulation 22, in particular criterion (v) of the Regulations, this Statement provides details of the main issues raised by policy area through the Publications Version of Local Plan 2031 Part 1 consultation from Chapter 6.

- 5.11 Specifically relating to consultation process itself, around 64 comments raised a main issue that the process ignored procedural and policy challenges and understates public opposition and consultation has been inadequate for changes of the magnitude proposed and thus the Plan is unsound because it is not justified by robust evidence. Therefore lower housing figures (based on government projections) should be used, site allocations removed from the Green Belt and AONB.

6. Summary of Main Issues

- 6.1 The following chapters outline the main issues that have been raised throughout the preparation of the Local Plan 2031 Part 1 which have been categorised by policy area to follow the different areas of the Plan. This is required by Regulation 22 (criterion iii to vi), which states a summary of the main issues raised at both Regulation 18 (Draft Local Plan and Housing Delivery Update) and Regulation 19 (Publication Version of Local Plan 2031 Part 1) stages of the Plan and a statement of how issues raised at Regulation 18 have been taken account in the Plan are required.
- 6.2 All the representations received from each stage of consultation have been summarised, considered and, where relevant, have influenced the Plan. The respective Consultation Statements (published in February 2014 and November 2014) provide further detail of the main issues raised through the Draft Local Plan and Housing Delivery Update consultation stages and how these main issues have influenced the Plan. Summaries of the main issues raised from previous consultation stages are provided within the following chapters including how these have informed the plan. This is followed by explanation of the outcome of the Publication Version of Local Plan 2031 Part 1 consultation through highlighting the main issues raised.
- 6.3 All representations received from the Publication Version of the Local Plan 2031 Part 1 consultation have been categorised and summarised which can be seen at Appendix 3.
- 6.4 In considering the consultation comments, the council have proposed minor changes to the Publication Version of Local Plan 2031 Part 1 which are illustrated within the 'Schedule of Proposed Minor Changes' which includes clear justification for the proposed minor change.

6.5 Policy Topic Area

The previous Consultation Statements have grouped the consultation responses by policy area in which is continued in this Statement to document the main issues raised. Along with summaries of the main issues raised through consultation stages, this also includes an explanation of changes during the evolution of the Plan which together provide an audit trail of how the policies have evolved.

Sub Area Strategies

- 6.6 The Publication Version of the Local Plan includes three sub area strategies which were established within the Draft Local Plan (February 2013) and have been carried through the preparation of the Local Plan. For each sub area, there is an overarching Core Policy detailing the quantum of development required within the area and the sites required to ensure delivery of the quantum which are set out within Appendix 1 of the Publication Version of Local Plan 2031 Part 1 with a Site Development

Template for each site. There are also other Core Policies within the Sub Area Strategies relating to specific infrastructure needs for that area.

- 6.7 The main issues raised for each Sub Area Strategy have been split by the overarching core policy, sites and infrastructure specific policies. Those sites that did not feature at Draft Local Plan stage do not include a summary of main issues raised at that stage. Comments received on those sites that have been removed and do not feature in the Publication Version of Local Plan 2031 Part 1 are included within the relevant Sub Area Strategy.

7. Spatial Strategy Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 7.1 The spatial strategy for the Vale is called 'building on our strengths' and set outs our strategy for the future shape of development across the Vale. The Draft Local Plan made provision for growth of around 14,300 new jobs and at least 13,294 new homes.
- 7.2 The majority of comments received on the Draft Local Plan were in favour of the proposed spatial strategy; particularly the settlement hierarchy. Specific comments raised the following main issues:
- the need for an up-to-date Strategic Housing Market Assessment (SHMA) to inform the draft plan;
 - concerns were raised about the perceived lack of infrastructure to support development;
 - a request was made to place greater emphasis on the historic environment, biodiversity and heritage assets of the Vale; and
 - concerns were expressed over the accuracy of the Village Facilities Study that was suggested should be updated.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 7.3 This Consultation was published to give stakeholders and members of the community maximum opportunity to inform the preparation of the plan. It was understood that an up-to-date SHMA was needed, but that consulting on the plan policies and existing proposals in 2013, would still be valuable.
- 7.4 Subsequent to the consultation, the council worked with the other authorities in Oxfordshire to prepare an up-to-date SHMA which informed the Housing Delivery Update.
- 7.5 An update was also prepared to the Village Facilities Study, which was published alongside the February 2014 consultation. The updated study benefited from the responses to the February 2013 consultation, including for example, re-classifying Charney Bassett as open countryside.
- 7.6 General support was received to the overarching spatial strategy and no changes were made directly relating to the consultation.

Housing Delivery Update 2014 Main Issues

- 7.7 The spatial strategy did not form a specific part of this consultation however the spatial strategy was reviewed to ensure it was the most appropriate to accommodate the new housing target, informed by the up-to-date SHMA. The spatial strategy was therefore updated to reflect the new proposed strategic development sites. No comments specifically focused on the spatial strategy were received.

- 7.8 To reflect the NPPF, a model policy for the presumption in favour of sustainable development was introduced into the Publication Version which ensures sustainable development is embedded in the Plan. A few representations of support were received for this Policy seeking to promote the delivery of sustainable development. However the main issues raised on the policy related to; the need of the policy to be more closely aligned to the NPPF model policy; and the policy is too flexible as the presumption in favour, with regards to economic benefits, will override other considerations especially relating to the AONB and other key designations.
- 7.9 The spatial strategy has remained the same throughout the various iterations of the Plan as it is based on the most sustainable option. General support has been received for the spatial strategy throughout the consultations. Specific comments received on Core Policy 3 'Settlement Hierarchy' focused on the methodology and classification of settlements in the hierarchy and raised the following issues;
- the sustainability points in the methodology take no account of the capacity of facilities;
 - there is a big difference within the larger village category between the size, character and facilities of each village;
 - East Hanney does not meet all the necessary criteria to be categorised as a Large Village; and
 - Harwell Campus is a Science Park not a village, it is more characteristic of Milton Park and Culham Science Centre than a settlement.
- 7.10 A number of comments were received regarding the role of smaller villages, supporting non inclusion of villages in the settlement hierarchy; however other comments suggested the lowest order settlements have played a role in maintaining the supply of housing and development at these settlements will help to maintain thriving communities.
- 7.11 Other general comments related to improvements to wording to ensure village character is protected; restricting housing development at smaller villages will force development into the green belt and AONB, but allocating sites in the green belt and AONB is a threat to rural character. Also it would make more environmental and economic sense to concentrate housing where employment is and where infrastructure exists.

8. Duty to Cooperate Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 8.1 Government legislation⁵ requires the council to cooperate with relevant public bodies when developing the local plan. The Duty to Cooperate Topic Paper⁶ sets out how we are working with neighbouring planning authorities and other partners to address cross-cutting strategic issues such as county-wide housing needs and growth around the Science Vale area.
- 8.2 Several comments noted the lack of a dedicated section within the plan explaining how the council had complied with the 'duty-to-cooperate'. Specific comments raised the following issues:
- concern about the impact on the Vale of development outside the district (development proposed to the East of Swindon);
 - concern about the stress development outside of Oxfordshire will place on county-wide infrastructure, and
 - a request was made for clear and demonstrable cooperation to take place between relevant authorities regarding the expansion of Oxford Brookes University.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 8.3 Ongoing discussions regarding cross boundary matters have been undertaken throughout plan preparation and a result of this process was the preparation of a joint SHMA with all other Oxfordshire Authorities, which informed the Housing Delivery Update, as discussed below.

Housing Delivery Update 2014 Main Issues

- 8.4 The fundamental basis of the Housing Delivery Update Consultation emerged as a result of an important 'duty to cooperate' process with the council working with all of the other Oxfordshire authorities in preparing a SHMA for the county. It identified an objectively assessed need for the county as a whole and for each district including the Vale of White Horse.
- 8.5 To reflect the SHMA work, the Housing Delivery Update document included a 'duty-to-cooperate' policy relating to the Oxfordshire unmet housing need. It stated that the council will work cooperatively with the other Oxfordshire local authorities to seek to jointly meet, in full, the objectively assessed need for housing across the Oxfordshire housing market area. It continues by stating that the council will first seek to accommodate its own housing need in full. In addition to this, the Council

⁵ Section 110 Localism Act 2011

⁶ Topic paper available from: www.whitehorsedc.gov.uk/evidence

will actively participate in any necessary joint work to identify and assess all options as to establish how and where any unmet need can best be accommodated within the housing market area. After this, should Vale of White Horse be identified as a district for accommodating any unmet housing need, then this would be achieved through either a review of the Local Plan, or appropriate land allocations would be made through a subsequent development plan document.

8.6 Specific comments raised the following issues:

- concerns that Vale would need to address un-met need expected to arise from Oxford City or other neighbouring authorities;
- the Vale's Local Plan was proceeding prematurely as a result of this and questioned its soundness as a result;
- need for a strategic review of the entire Oxford Green Belt;
- impact of the proposed Eastern Villages development within Swindon Borough Council close to the Vale's boundary on the rural setting of villages in the Western Vale Sub-Area and on transport network;
- some support of the policy;
- a lack of evidence of cooperation with neighbouring authorities;
- the Vale's housing target should be accommodated outside of their administrative area due to the constrained nature of the district due to flooding, Green Belt and AONB;
- Oxfordshire County Council stated they will continue the partnership working with the council to try and overcome the issues raised to enable timely progression of the Local Plan, and
- support from Thames Water stating the importance of working with neighbouring authorities to ensure that sufficient capacity is available.

How was the Duty to Cooperate discharged?

8.7 Evidence of how the council is fulfilling its 'duty to cooperate' through ongoing meetings and communication with neighbouring authorities is set out in our Duty-to-Cooperate Topic Paper available on the council website⁷. There have been a number of important additions and agreements made as a result of the 'duty-to-cooperate' process, which have been informed by existing, new and updated guidance, as well as through the consultation process. These include Oxfordshire Unmet Housing Need and proposed developments to the east of Swindon.

8.8 A number of cross boundary meetings have taken place since the February 2013 consultation involving the council, Swindon Borough Council and Oxfordshire County Council. These meetings originated as a result of the consultation responses received highlighting the potential impact of development at the "Eastern Villages" in Swindon would have on residents in the Western Vale Sub-Area. Through cross boundary cooperation, two Statements of Common Ground were agreed between

⁷ Topic paper available from: www.whitehorsedc.gov.uk/evidence

these parties which formed part of the examination process of Swindon Borough's Local Plan 2026. These statements confirmed that the housing need of each authority could be most sustainably met within each districts own administrative area.

- 8.9 The draft policy CP3a within the Housing Delivery update has been updated for the Publication Version, and is now entitled Core Policy 2. This policy provides a more up-to-date picture of the situation, including more detail on the processes which need to be followed to address any unmet need which has appropriately been informed by ongoing duty to cooperate work. The Vale of White Horse District Council continue to work cooperatively with all Oxfordshire authorities in progressing work on identifying an unmet housing need for the housing market area.
- 8.10 Around 8 comments of support were received through the consultation, mainly stating they support the fact that the Local Plan is based on its objectively assessed housing needs for the District and the pragmatic approach taken to working with other Oxfordshire authorities to address unmet needs. Other issues were raised; in particular the need for a timescale for joint working on unmet need and the additional work needs to be undertaken prior to submission of the Local Plan 2031 Part 1. Reflecting this the County Council are supportive of the intention to work jointly however state there is a need for an Oxfordshire wide approach to ensure coordinated planning.
- 8.11 Around 26 comments were raised solely on the unmet need for Oxford City. These comments raised the following main issues;
- the plan does not take account of the unmet need and is insufficiently flexible to meet the housing target identified;
 - disregarding Oxford's unmet needs is inappropriate;
 - clarification is needed as to whether the Plan will accommodate unmet housing needs from adjoining Districts;
 - support that additional housing within the District is required, and in the short term will increase the five-year housing land supply;
 - Oxford's unmet need cannot be accommodated in the District due to lack of infrastructure and impact on heritage and rural character; and
 - Policy CP2 should acknowledge that Oxford will be unable to accommodate the whole of its new housing requirement and a contingency reserve site(s) should be planned.

9. Sustainability Appraisal Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 9.1 The council is required to conduct a Sustainability Appraisal (SA) of the plans during its preparation. This considers the social, economic and environmental impacts of proposed policies. The SA Report that accompanied the Draft Local Plan demonstrated how the Draft Local Plan had been assessed against the SA Framework.
- 9.2 A number of comments expressed support for the SA undertaken. Other comments challenged the definition of sustainable development as defined in the National Planning Policy Framework (NPPF) and used by the council. Specific comments raised the following issues:
- the SA should be informed by an up-to-date SHMA;
 - objection raised to the council's assessment that land for surplus employment at Didcot Site A is a sustainable development option;
 - doubt that development at Wantage and Grove meets the sustainability objectives that seek to place homes near to employment;
 - a request was made that the council explicitly recognises that in certain cases the 'presumption in favour of sustainable development' does not apply within Areas of Outstanding Natural Beauty (AONB); and
 - a request that sustainability objectives relating to air, noise and light pollution and education are referenced in the main plan document.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 9.3 The issues relating to air, noise and light pollution and education are referenced in the Plan policies as a result of the appraisal findings and other evidence throughout the preparation of the Local Plan.
- 9.4 The up-to-date SHMA for Oxfordshire identified a new 'objectively assessed need' for housing in the district of 20,560 homes. This led the council to propose a series of new strategic sites to meet this need and it was important these sites were tested through the SA. The sites were published in the Housing Delivery Update and an accompanying update to the SA Report.
- 9.5 Two alternative approaches to growth at Didcot A were considered during the preparation of the Housing Delivery Update. The SA concluded that the most sustainable option would be to support Option B, a policy for the Didcot A site which is broadly supportive of B-class uses on half of the site with further employment uses and complementary alternative uses to be supported on the remainder of the site.

Housing Delivery Update 2014 Main Issues

- 9.6 A stated above, an Interim SA Report was produced and published alongside this consultation setting out how the new housing target and sites had been assessed by the SA. Comments raised the following issues:
- Historic Environment - concern the SA did not adequately assess the setting of heritage assets and cumulative effects and recommendations for additional historic baseline data to be included in the SA Report;
 - AONB/Alternative - concern over reasoned justification for selecting the preferred approach and for not testing alternative approaches including scale of development and cumulative impact on the AONB;
 - Sites - requests for further justification;
 - Alternatives - query whether testing meeting housing need outside of the district has taken place; and
 - Mitigation - the need for appropriate mitigation to be identified for specific sites, and comments on the water and wastewater capacity of infrastructure needed to support the site proposals.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

- 9.7 The following was undertaken;
- an Historic Landscape Characterisation (HLC) was carried out for each of the sites proposed and site appraisals were updated and a historic data map has been inserted within the SA Report;
 - a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development of land;
 - The LVIA involved assessing the likely effectiveness of mitigation measures, proposing a mitigation strategy and identifying the residual landscape and visual impacts once these measures had been applied;
 - the SA assessed the more detailed options for development around Harwell Campus and was informed by the LVIA;
 - the scale of development proposed in the AONB has been reduced;
 - the Oxfordshire Statement of Cooperation sets out how the outcomes of the SHMA would be managed;
 - all site appraisals have been reviewed and updated to reflect the comments received, including water and wastewater capacity of sites; and
 - the SA Report highlights the mitigation required for the proposed sites.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 9.8 Natural England has made comments on the SA process highlighting a few issues. They disagree with the LVIA findings and suggest the SA scoring of site options is unclear. Overall they would like further justification in relation to a number of matters relating to the sites allocated within the AONB, more specifically the reasonable alternatives to the overall strategy as to whether more appropriate sites are located outside of the AONB, the

approach to meeting objectively assessed housing need, economic impact of the sites allocated in the AONB and the difference between the sites allocated in the Housing Delivery Update and the Publication Version. They also raise concerns over the landscape impact at land south of east Hanney; east of Kingston Bagpuize with Southmoor; north of Shrivenham in that development would be contrary to LCS findings. They comment that North of Shrivenham site is likely to have adverse hydrological effects on Tuckmill Meadows SSSI and landscape indicators should include developments which detrimentally affect AONBs.

- 9.9 Oxford City Council have raised one main issue regarding the SA; the option of 'unmet need' should have been considered through the SA through assessing three further strategy housing delivery options and consider it necessary to test an additional option for the 'overall pattern of development' that would focus development adjacent or in close proximity to Oxford.
- 9.10 CPRE have raised a number of concerns regarding the SA, including the following issues:
- concerns regarding options stating previous alternatives considered are unreasonable as they are pre-SHMA and they have suggested a range of alternative options;
 - quite detailed comments on the SA Report including the various stages undertaken, suggesting some of the tasks have been undertaken inadequately;
 - the approach of defining environmental objectives in only very broad-brush terms means that none of the complex types of effect have been considered for any of the areas earmarked for development (particularly landscape);
 - the ratings of adverse effects in the tables in Appendix are not credible;
 - not enough mention of synergistic, secondary or cumulative effects;
 - the potential environmental effects of the scale of development within the 'Science Vale Ring Fence' (Section 14) have not been properly assessed;
 - does not explain at any point any technical difficulties; and
 - the SA wrongly accepts the inroads into the Green Belt, AONB, the setting of Listed Buildings etc as being sanctioned by the NPPF, when the opposite is the case.
- 9.11 A number of general comments were made regarding the SA, with the following main issues raised;
- the SA/SEA has failed to properly consider alternatives;
 - concerns over the SA approach to Core Policy 2;
 - further justification for development in the AONB required and explanation required to whether the option of no development in the AONB has been considered as an alternative in particular from East

Hendred Parish Council and alternatives have been suggested by Save Chilton AONB Action Group;

- clarification as to how the proposed mitigating measures and monitoring will have less negative effects in particular environmental effects on villages;
- the proposed 219 hectares of employment does not seem to be within the range tested;
- refute development at East Hanney in particular suggestions in the SA that development would 'improve access to services and facilities in East Hanney; and
- questions raised over the appraisal findings for the spatial strategy alternatives, stating that significant effects will occur for Objectives 3, 7, 8, 9, 10 and 11 under Option G (high growth).

9.12 In regards to the Habitats Regulation Assessment, only a couple of comments were received which raised the following issues;

- Natural England suggested the conclusion should be in line with the recently completed Habitats Regulation Assessment of the Cherwell Local Plan which (as we understand it) assessed the same in-combination growth; and
- Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust state for the Local Plan to be sound Core Policy 34 needs to include a commitment should monitoring indicate an effect on the SAC from air pollution, and such mitigation measures need to be identified and demonstrably effective.

10. Economic Development Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 10.1 The Draft Local Plan outlined a number of policies intended to support a strong and sustainable economy within the district including prioritising Science Vale as an area of job growth and directing new shops and facilities towards the main settlements.
- 10.2 Over 290 comments were made relating to economic development. Many respondents provided feedback on the strategic employment allocations with other comments related to specific policies and proposals. Specific comments raised the following issues:
- concern that barriers to bringing forward the existing allocated employment sites have not been adequately addressed;
 - support for the redevelopment of the old power station site at Didcot A;
 - imbalance between land allocated for housing in Wantage and Grove and for employment;
 - concerns that not enough employment land has been allocated in the Western Vale;
 - concern about plans to redevelop Elms Parade in Botley;
 - concern that the value of agricultural land is overlooked; and
 - the plan should place greater emphasis on the promotion of tourism.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 10.3 A number of changes have been undertaken to the policies relating to economic development across the district;
- Minor changes have been made to the draft policy on Harcourt Hill;
 - Abbey Shopping Centre and the Charter, Abingdon-on-Thames policy updated in light of the addendum to the Retail and Town Centre Study;
 - New Employment Development on Unallocated Sites, the policy has been updated to provide one set of criteria for unallocated sites in more sustainable locations while a wider set of criteria is required for more rural areas;
 - Change of Use of Existing Employment Land and Premises, changes to reflect changes introduced by Government on permitted development rights;
 - Further and Higher Education: the supporting text was expanded to recognise the higher education facilities at Cranfield University and support development and expansion of these facilities;
 - Development to Support the Visitor Economy: the term tourism replaced with Visitor Economy to better reflect this sector as the term and the supporting text makes reference to the Joint Hotel Needs Assessment which will act as a guide for new hotel development;

- Retail and main town centre uses: the supporting text provides clarity on what is defined in the NPPF and policy has been updated to make it more legible; and
- other retail provision will be provided on some of the larger proposed strategic sites.

10.4 Furthermore, the council has updated its evidence base documents including an addendum to Employment Land Review, addendum to Retail and Town Centre Study, and a Joint Hotel Needs Assessment for the Vale of White Horse and South Oxfordshire Districts.

Housing Delivery Update 2014 Main Issues

10.5 This consultation did not expand in any detail on economic development policies with the exception of revising wording to the Core Policy for Didcot A Power Station. A small number of comments were received, with the following issues being raised:

- the Didcot A Power Station (from landowners, operators of the adjacent Milton Park and Didcot Town Council) opposing certain elements of the revised core policy mainly objections to the predominance of B1 uses. There was, in general, support for the policy;
- why has no additional employment land been allocated in parallel with the strategic sites proposed in this consultation; and
- objections received relating to redevelopment of Central Botley area.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

- 10.6 In relation to Didcot A Power Station, the policy was updated and enhanced. The addendum to the Employment Land Review identified that the site could support the provision of approximately 2,000 direct jobs on this site over the plan period and as a result the policy was amended to prioritise B1 and uses will need to reflect demand, suitability of the site and other criteria.
- 10.7 In relation to Meeting Business and Employment Needs, the addendum to the Employment Land Review identified additional employment land at Harwell Campus and the inclusion of Milton Hill Business and Technology Centre within the list of sites. This has increased the amount of land available for future employment uses in the district (219 ha).
- 10.8 In relation to Central Botley Area, the study also identified a need to accommodate retail growth in the north east of the district. Botley provides a logical town centre location with land available next to the existing retail core to accommodate some of the needed growth. The site area reflects land stated to be available for development or redevelopment, and the full area is included to ensure a comprehensive design and access solution is achieved.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 10.9 The economic needs for the District are set out in Core Policy 6 of the Publication Version Local Plan 2031: Part 1 with a number of detailed economic policies within Core Policies 28 to 32.
- 10.10 Around 61 comments objected to the revised projected employment figure of approximately 23,000 jobs questioning the accuracy of the figure, the lack of a challenge to the evidence, and requested a much lower employment figure for the district in order for the plan to be made sound. Also 4 comments would like more regular monitoring of economic performance.
- 10.11 There were approximately 19 comments regarding site specific employment locations raising the following issues; not enough vacant/developable land in Abingdon-on-Thames, object to further employment at Cumnor Hill, no realistic job opportunities in Western Vale compared to housing growth, seeking a flexible approach to the delivery of employment land at Monks Farm, and seeking re-allocation of Milton Interchange site as a mixed use site.
- 10.12 No main issues were raised in regards to Core Policy 28 'New Employment Development on Unallocated Sites' just one comment of support.
- 10.13 Four objections were raised in regards to Core Policy 29 'Change of Use of Existing Employment Land and Premises' with one support. The objections related to the policy being overly restrictive and greater flexibility should be provided for the change of use to non employment uses.
- 10.14 No main issues were raised in regards to Core Policy 30 'Further and Higher Education' however comments highlighted that specific educational facilities should be mentioned and the approach to universities should be consistent throughout the District.
- 10.15 A mixture of support and objections were received in relation to CP31 'Development to Support the Visitor Economy'. English Heritage and Oxfordshire County Council were broadly supportive of the policy. Objections focussed on the lack of identified need for hotels and that the policy implies that larger scale development will be supported in market town and local service centres to support visitor economy.
- 10.16 General comments or objections were received relating to CP32 'Retail Development and Other Main Town Centre Uses'. The objections related to confusion about functional roles of certain centres, the application of town centre policies to local service centres, and provision of town centre uses at Botley. It is suggested the policy be made clearer in regard to these issues.

11. Housing Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 11.1 The Draft Local Plan set out a target for at least 13,294 homes to be built across the district between 2006 and 2029. The target was based on housing numbers specified in the South East Plan, since abolished but at that point in time representing the best evidence available.
- 11.2 To meet this target required the identification of sources of supply for an additional 5,150 homes, allowing for commitments. Strategic housing allocations were proposed at Harwell Parish (adjoining Didcot), Faringdon, Harwell Campus, Wantage and Grove. The plan also stated that there would be 'a presumption in favour of sustainable development' for development within the built areas of existing market towns, local service centres and larger villages. Only limited development would be permitted in smaller villages.
- 11.3 The consultation also sought views on housing policies relating to: housing mix; density; affordable housing; rural exceptions; housing needs for ageing population; and housing for Gypsy and Traveller communities.
- 11.4 Over 400 comments raised issues over housing provision for the district. Concerns were raised about the scale of the housing proposed, including the relationship with the South East Plan figures, and the allocation of sites for development. Specific comments raised the following main issues regarding housing requirement:
- It is contrary to the NPPF, an up-to-date SHMA was not undertaken to identify the objectively assessed housing needs;
 - doubts whether employment growth would take place to justify or support the planned housing;
 - questions about unmet need to be addressed under the 'duty-to-cooperate' (e.g. from Oxford) and would need to be accommodated in the Abingdon-on-Thames and Oxford Fringe Sub Area; and
 - delays in the delivery of large sites suggests that the sites proposed would not be a reliable source of consistent housing supply and contingency sites would be required
- 11.5 Specific comments on housing mix raised issues regarding the policy is not supported by up-to date evidence, it fails to address the imbalance of the existing housing stock, plan lacks detail about housing mix, and it needs to acknowledge the circumstances where a different mix may be appropriate.
- 11.6 Specific comments on housing density stated the policy should be quoted as maximum and as minimum target, and should be more place specific.
- 11.7 Specific comments on affordable housing raised issues relating to the target is too high and also is too low, the policy should acknowledge that

other market factors and contributions will be taken into consideration and separate targets should be set for urban and rural areas.

- 11.8 Comments on rural exceptions raised issues regarding will the policy adversely impact the character of villages, criticism that market housing is allowed and concern that it may encourage speculative schemes.
- 11.9 Comments on accommodating the current and future needs of the aging population housing requirement raised issues relating to the standard will adversely impact the viability of schemes, a target should be included for number of homes that are required to address the housing needs of the elderly, homes for the elderly should not be delivered in accordance with the affordable housing policy, and homes designed for the elderly should be located in urban areas or larger settlements.
- 11.10 Comments on meeting the housing needs of gypsies, travellers and travelling show people included, greater clarity required in relation to the term reasonable distance, and support for policy.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 11.11 In relation to housing mix, the policy allows a more flexible approach on a site basis if site specific evidence is available, such as relating to viability.
- 11.12 In relation to density, the policy now includes reference to the importance of ensuring the density of proposals enhances the character and legibility of an area. In addition, the supporting text has been enhanced by making reference to good design principles such as legibility and urban structure.
- 11.13 In relation to affordable housing the SHMA (2014) identifies the number of affordable housing units required and their type, tenure, to address the future needs of the district which is reflected in the policy.
- 11.14 In relation to rural exceptions, the policy has been strengthened to ensure that it offers protection against inappropriate development is supported by the parish council and provides flexibility where viability is demonstrated to be a factor.
- 11.15 In relation to accommodating the current and future needs of the aging population, this policy has been updated, particularly to provide clarity that it applies to 'all homes designed for older people', rather than 'all homes', to be built to Lifetime Home Standards (including flats above ground floor).

Housing Delivery Update 2014 Main Issues

- 11.16 The Oxfordshire SHMA was published early in 2014⁸. This identified:

⁸ Economic Forecasting to inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment (SQW and Cambridge Econometrics, 2014) which forecast the provision of 23,000 additional jobs in the Vale 2011-2031.

- an up-to-date and objectively assessed housing need for the Vale of 20,560 homes in the period 2011-2031;
- a need for 4,914 affordable (subsidised) homes per annum, expressed as 273 affordable homes per annum in the period 2013-2031;
- updated data on housing type, size and mix; and
- a level of housing need for Oxford City that is unlikely to be fully met within the City with the residual requirement, to be identified, to be addressed and met by cooperative working across the remainder of the housing market area.

- 11.17 The council held this focused consultation to address the findings of the SHMA, in particular on using SHMA objectively assessed need as a housing target. The consultation identified sources of supply for a further 7,430 homes to meet Vale needs (over and above sites identified in 2013). An additional 21 strategic site allocations were proposed to meet this requirement. The site package reflected that around 4,000 of these homes would need to be delivered in the first five years of the plan period to maintain a five-year housing land supply.
- 11.18 The consultation also set out a commitment to joint working under the 'duty-to-cooperate' to address any unmet housing needs in the housing market area and revisions to the Green Belt boundary and some other policy refinements, addressed in the Green Belt section of the paper (para 16.1).
- 11.19 The overwhelming majority opposed to an increased housing requirement and the additional sites put forward.
- 11.20 Comments on the housing requirement related mainly to the SHMA figure which should be moderated to reflect sustainability, deliverability and infrastructure limitations, it is over-inflated based, unrealistic employment forecasts, welcome recognition of the economic potential of Harwell Campus and the need to support economic growth through increased housing delivery, and the plan should set out contingency arrangements.
- 11.21 Comments on housing distribution related to objections to housing development in AONB and in the Oxford Green Belt, Western Vale should accommodate more than 10% of the housing requirement and new housing should be concentrated on brown field sites.
- 11.22 Comments on five year supply stated the Plan should include smaller sites than the 200 strategic threshold to assist deliverability and reduce the frontloading of housing numbers in the first 5 years.
- 11.23 Comments on housing mix related to the need to consider the role that flats could play to provide affordable housing, address the needs of the elderly, consider the number of empty or under-used buildings, and large dwellings should be adaptable with the potential for subdivision.

11.24 In relation to affordable housing support received for the affordable housing target of 40%, and criticism raised that the affordable housing policy may result in a larger number of smaller units being delivered.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

11.25 The following key changes have been made to the Publication Version;

- Policy CP4 was updated to reflect the up-to-date objectively assessed needs identified in the 2014 Oxfordshire SHMA;
- consultation feedback was used to refine and improve site proposals.
- Duty-to-Cooperate policy was refined to stress the importance of making timely progress to address unmet need;
- commitment to an early review or other appropriate process to address unmet need from Oxford City as soon as a sub-regional solution is identified;
- the plan is accompanied by an up-to-date five year housing land supply statement that demonstrates that once adopted, the proposed site allocations set out in the Publication Version of the Local Plan will ensure a five year housing land supply can be achieved; and
- Viability Assessment published in 2014 examined the potential impact of the affordable housing target. It indicated that reducing the affordable housing target to 35% would have the benefit of significantly increasing the viability of development and thus the ability of sites to contribute to infrastructure provision. Therefore, the target has been reduced to 35 per cent in the Publication Version Local Plan.

Publication Version of Local Plan 2031 Part 1 Main Issues

11.26 The majority of comments received on housing mainly raised issues relating to the housing target as set out in the SHMA (over 300 comments received). Issues raised related to job growth and housing requirement being unsound and SHMA overstates housing need which is twice the government's household projection. Issues were raised regarding inconsistency between economic and housing growth assumptions, uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs AONB, the projection for job growth which informs housing figure is unsustainable and unrealistic and Oxfordshire Strategic Economic Plan (SEP), which is the basis of the SHMA, has not been subject to public consultation or any independent scrutiny.

11.27 There were a few supports for CP4 (around 16) relating to the housing target, the need to build more houses as prices are impediment to growth, and the council are addressing its evidenced housing needs.

11.28 The environmental impact from proposed sites was highlighted as an issue through additional comments, allocating in the AONB is not appropriate

when considered against alternatives, and no great weight has been applied to AONB characteristics in assessments.

- 11.29 Concerns raised regarding affordability of houses, whether houses will be able to be sold, is there a link between average salaries and house prices and building more houses does not improve affordability.
- 11.30 A number of supports for CP5 'Housing Supply Ring-Fence' for the Science Vale area, this is the most appropriate area and will enable joint working to ensure provision of employment and housing is integrated and necessary infrastructure is provided.
- 11.31 Several comments raised issues regarding Core Policy 5 relating to;
- the proposed Ring-Fence would lead to the coalescence of villages with Didcot, thus needs to be redrawn;
 - the Vale's housing need should be calculated as one five-year housing land supply, not artificially divided up and no evidence that the proposed ring fence part of the district constitutes a distinct or identifiable housing market area;
 - the council needs to justify the policy better and clarify how it will operate alongside maintaining supply in the rest of the district and what contingency measures will be brought into play if this mechanism fails;
 - remove the North Wessex Downs AONB from the Science Vale Ring-Fence as it does not comply with the NPPF 115 and 116, the CROW Act 2000 Section 85, and to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets; and
 - housing provision across the District and South Oxfordshire to support the Science Vale has not been made clear as housing provision straddling boundaries is often not provided in documented evidence.
- 11.32 Around 10 comments received regarding CP22 'Housing Mix' with the following issues being raised, the policy is overly prescriptive on house types, it is too reliant on the SHMA, it is not clear how the housing mix will be deemed appropriate and the test for alternative non-SHMA mix is excessive.
- 11.33 Around 19 comments received regarding CP23 'Housing Density' with a few comments supporting the policy however one main concern was raised stating there is no requirement for specific local circumstances in the NPPF.
- 11.34 A number of comments raised the implications of the revised Planning Practice Guidance (PPG) on affordable housing and how this will have implications on CP24 'Affordable Housing' to ensure conformity. Around 13 supports were received stating that lowering the percentage of affordable housing to 35% will assist viability, whilst still ensuring that need for affordable housing can be met in full. Also the flexibility of the policy

will help to ensure sites will be deliverable. A few comments raised the need for a less prescriptive split for rented and intermediate housing.

- 11.35 Around 6 comments were received regarding CP25 'Rural Exceptions Sites' with the majority raising concerns regarding the difficulties in agreeing methods for housing assessments and there is a threat to rural sites under this policy.
- 11.36 Around half of the comments received on CP26 'Accommodating Current and Future Needs of the Ageing Population' support the policy. No main issues were raised however concerns were highlighted regarding further clarity as to whether it is seeking a specific provision of lifetime homes on all sites or whether this expressly focuses on age restricted dwellings and the policy should encourage retirement housing further.
- 11.37 No main issues raised regarding CP27 'Meeting the housing needs of Gypsies, Travellers and Travelling Show people' however comments were received regarding currently capacity at existing sites and support for the policy.

12. Infrastructure Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 12.1 The Draft Local Plan recognised that development should be accompanied by new infrastructure such as roads, schools, services and facilities. It stated that infrastructure would be provided by developers using Section 106 legal agreements. Where major developments are planned, an independent viability assessment would take place to ensure that developers are able to make the infrastructure contributions needed. The report also stated that the was considering introducing a Community Infrastructure Levy (CIL), which would partly replace Section 106 contributions and assist the delivery of infrastructure alongside new development.
- 12.2 The comments received noted a range of district-wide and settlement specific infrastructure needs that are likely to be exacerbated by new development. Specific comments raised the following issues:
- new infrastructure should be provided before significant development;
 - significant upgrades to the existing road network would be required;
 - concerns that schools will become oversubscribed;
 - local communities should be consulted to help determine local infrastructure needs;
 - requests that broadband provision be upgraded across the district;
 - include a policy for telecommunications provision from the Mobile Operators Association;
 - a request that the plan is updated to provide clarity about the role of the Infrastructure Delivery Plan (IDP) which is a live document;
 - a concern that the Growth and Infrastructure Bill could potentially weaken the reliance on existing statutory mechanisms to secure infrastructure contributions from developers; and
 - requests that a proportion of revenue raised by the Community Infrastructure Levy (CIL) should be returned to local communities.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 12.3 Many of the comments relating to infrastructure were due to a lack of understanding about the processes involved in infrastructure planning therefore the key actions taken forward were:
- to better explain infrastructure planning and delivery;
 - to better explain the role of the Infrastructure Delivery Plan (IDP);
 - to better explain the Community Infrastructure Levy (CIL);
 - to continue to work closely with stakeholders and utility providers; and
 - the need for a policy on telecommunications provision was considered and it was decided that it would more appropriately be incorporated into Local Plan 2031 Part 2.

Housing Delivery Update 2014 Main Issues

- 12.4 This consultation document included a number of new site proposals, as described above. A Development Site Template was included in the Plan for each of these sites which set out the identified policy and infrastructure requirements for each site.
- 12.5 The document was also accompanied by an Infrastructure Delivery Plan (IDP), which set out the key pieces of infrastructure that needed to be delivered to ensure plan success and to achieve sustainable development. However, it was made clear that the IDP was at an early stage and that more detailed information would be provided at future plan stages.
- 12.6 In general, concerns raised were similar to the previous consultation regarding capacity of infrastructure to accommodate the proposed growth.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

- 12.7 Following the consultation the council has continued to work with stakeholders and utility providers. In response to the concerns raised about infrastructure, the council produced a document entitled 'Delivering Infrastructure Strategy' to explain what infrastructure in the Infrastructure Delivery Plan (IDP) will be delivered and how. In relation to other issues raised:
- comments from Thames Water were incorporated in to the plan;
 - a policy supporting the reopening of Grove Railway Station has been included in the plan;
 - the Development Site Templates have been updated to outline the policy and infrastructure requirements for each site; and
 - the IDP has also been updated,

Publication Version of Local Plan 2031 Part 1 Main Issues

- 12.8 A significant number of comments were received regarding CP7 'Providing Supporting Infrastructure and Services' raising a few main issues. These relate to the following;
- concerns over increase of traffic on the A34 and other roads in the vicinity (A417);
 - A420 is already congested, improvements to junctions to allow more traffic onto an already congested road is no solution, full dualling of the A420 required, improvements in infrastructure must be front loaded;
 - Around 20 comments raised general transport concerns, stating public transport already operates at full capacity, improvements are aspirational, many local roads are narrow and cannot be widened, sustainable alternative links are inadequate, no railway station in major settlement and cycling needs more emphasis in the plan;

- Infrastructure delivery in Abingdon regarding necessary improvements to local roads (Dunmore Road and Twelve Acre Drive) and highways;
- Around 20 comments relating to infrastructure at Cumnor; and
- number of comments related to insufficient planning for water & sewage infrastructure. Thames Water raises concerns that upgrades and reinforcement to sewage treatment works will be secured via S106 agreements, which they consider is not the appropriate mechanism for funding such upgrades and provide specific site issues.

12.9 In addition to the main issues raised above, around 80 comments expressed general concerns with planned infrastructure provision. Generally existing infrastructure in the Vale is deemed to be already insufficient, at capacity and is not able to support the huge increase in the number of houses in the plan and thus the Plan is considered to be ineffective, not positively prepared, unsustainable and unsound as it currently stands in relation to infrastructure delivery.

12.10 A few comments also raised the need for additional provision of health care services, the IDP is a high level summary of the essential infrastructure needed, but is not exhaustive, timetable of infrastructure provision is required, and CP7 should be amended to remove clause iii and to make clear how the council will balance infrastructure provision and affordable housing provision.

13. Built and Historic Environment Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 13.1 The consultation proposed that new development should sustain and enhance the historic environment and not detract from the significance of heritage assets or their settings. The council also proposed to safeguard a continuous route for restoration of the Wilts & Berks Canal. The comments received were broadly supportive of the proposed policies to sustain and enhance the built and historic environment. Specific comments raised the following issues:
- support for including reference to the “setting” of heritage assets when considering new development;
 - support for the recognition that non-designated heritage assets are also an important part of the built and historic environment;
 - a comment from English Heritage that the spatial strategy could be informed by a more robust evidence base on the historic environment;
 - a further comment from English Heritage that the policy on the Historic Environment should look to be more positive, with more reference to conservation and enhancement of the historic environment throughout the plan;
 - insufficient consultation on the restoration of the Wilts & Berks Canal; and
 - a request from Thames Valley Police to include a policy reference to Crime Prevention through Environment Design.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 13.2 Following the comments from English Heritage, the policy has been re-written so it is a more positive strategy for the conservation and enhancement of the historic environment. The policy also sets out how the District Council will build up its evidence base relating to the historic environment.
- 13.3 Following the consultation the council met with landowners affected by the Wilts and Berks Canal and members of the Wilts and Berks Canal Trust. Whilst the council supports the principle of restoring the Wilts and Berks Canal, it is considered that there needs to be further work undertaken to demonstrate the feasibility of the restoration, including closer working with landowners. Therefore the adopted Local Plan Policy L14 and L15 will continue to be saved and will provide protection of the historic route and a policy will not be included in Local Plan 2031 Part 1.

Housing Delivery Update 2014 Main Issues

- 13.4 The council recognises the importance of the design quality of new developments, not only to help protect the existing quality of Vale

settlements, one of its greatest assets, but also to ensure new developments are sustainable and attractive places to live. The council acknowledges the importance of design and the consultation comments received relating to this matter. As a result, the council has strengthened its policy and prepared a new Design Guide Supplementary Planning Document for the district.

13.5 The consultation on the new design policy raised the following issues:

- how will the council enforce high quality design and design criteria for assessing the quality of new developments;
- Thames Valley Police (Design) concerned as to why reference to 'Secured by Design' has been omitted from Core Policy 37;
- suggest that the council incorporate and recognise the application of minimum standards, minimum space standards; and
- Equality Officer at the council would like to see reference to Wheelchair Accessible Homes and Lifetime Homes.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

13.6 Following the consultation minor changes were made to the two design policies. The subjects of Secured by Design, space standards and Wheelchair Accessible and Lifetime Homes were consulted on as part of the Government's Housing Standards Review. As the Government is exploring setting standards for these aspects it would be premature to set standards in the Local Plan. If such standards are not forthcoming then they can be incorporated in to Local Plan 2031 Part 2.

Publication Version of Local Plan 2031 Part 1 Main Issues

13.7 A few comments were received regarding CP39 'the Historic Environment' with English Heritage generally welcoming the policy. They have raised a number of modifications throughout the Plan to ensure the Plan has a "positive" strategy for the conservation and enjoyment of, and a "clear" strategy for the enhancement of, the historic environment. They would like a few amendments to this policy relating to the clarity regarding character appraisals, more detail on assets at risk and reference to non-designated heritage assets.

13.8 Other comments raised a few issues relating to;

- consider the policy could be strengthened to give it more weight;
- Oxfordshire County Council state CP39 is acceptable although fairly basic which will be expanded on in Part 2;
- the plan has failed to exclude areas of heritage sensitivity from development;
- the plan has not given due weight to the LPAs' special statutory duty to give "considerable weight" to the desirability of preserving or enhancing

the setting, character and appearance of listed buildings and conservation areas;

- Oxford City Council object as there is no reference to Oxford skyline as a heritage asset; and
- few comments suggest reinserting the previous policy on the Wilts and Berks Canal.

13.9 Similar comments were received for CP37 'Design and Local Distinctness' and CP38 'Design Strategies for Strategic and Major Development Sites' in particular English Heritage welcomes the policies, the council's preparation of a comprehensive design guide and the recognition that quality design and the historic environment are linked. Also CPRE consider that CP37 & CP38 do not give sufficient strength to refuse an application if faced with a large development of a uniform and mediocre standard and suggest introducing a 'Certificate of Quality' to judge if an application for larger developments meets the requisite standards.

13.10 Other issues raised in regards to CP37 relate to the need to consider strengthening the policy to provide a more robust emphasis on the need for high quality design. Around 13 comments were received regarding CP38 'Design Strategies for Strategic and Major Development Sites' which raised issues relating to the need for a higher profile for community engagement in the design process and support for the policy.

14. Climate Change Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 14.1 The Draft Local Plan proposed to address the causes of climate change by increasing the use of decentralised, low carbon and renewable energy, heat and transport fuels. Proposals were set out to locate housing near to jobs, whilst promoting improved broadband coverage, all aimed at reducing the need to travel by car. The council also proposed to identify ways of building resilience to the effects of climate change such as flooding and an increased incidence of extreme weather.
- 14.2 The consultation revealed that many people were concerned about flooding across the district and the measures proposed for dealing with this risk. There were also a number of suggestions made with regards to supporting and promoting the development of more sustainable forms of energy generation. Specific comments raised issues relating to:
- a recommendation from the Environment Agency to undertake a Water Cycle Study (WCS) to inform the preparation of the final plan;
 - a suggestion that the council introduce an integrated flood management strategy for the length of the Thames;
 - provide information about renewable energy generation in the District and how it will contribute towards meeting government targets by 2020;
 - claims that there is no clear strategy for achieving carbon reduction;
 - a suggestion that development over 10 houses should be subject to an air quality survey conducted on-site; and
 - a claim that the plan does not justify the requirement for all homes to be built to Level 4 of the Code for Sustainable Homes.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 14.3 On the recommendation of the Environment Agency, a Water Cycle Study has been carried out to support the allocations in the Local Plan. In relation to the Code for Sustainable Homes, the Local Plan no longer makes reference to this as the government has indicated that they will be incorporating the relevant standards into building regulations.

Housing Delivery Update 2014 Main Issues

- 14.4 There were no policies relating to Climate Change in the Housing Delivery Update.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 14.5 The Publication Version took forward the policies proposed in the Draft Local Plan with amendments as explained previously. The relevant policies are Core Policy 40 to Core Policy 42.

- 14.6 Only a few comments were received on CP40 'Sustainable Design and Construction' with only one main issue raised by the Environment Agency. The Environment Agency note a Water Cycle Study is being undertaken which recognises the Vale is in a water stressed area which is reflected in the Plan and indicates a higher level of water efficiency standard will be formalised within Local Plan 2031 Part 2, at a later date. The Environment Agency considers when taking account of the above evidence base, this policy is not justified, in so far as it does not reflect the evidence base documents of the Plan. Given the Local Plan 2031 Part 1 will allocate a significant proportion of the growth within the district, and development may come forward prior to the adoption of the Local Plan Part 2. There will be no mechanism to deliver such water efficiency measures in this scenario. Therefore suggest revised policy wording to ensure higher water efficiency standards, the following inclusions: vii New developments shall be designed to a water efficiency standard of 105 litres/head/day (l/h/d) for new homes, and BREEAM (BRE Environmental Assessment Method) 'Excellent' with a maximum number of 'water credits' or equivalent.
- 14.7 Similarly only a few comments were received relating to CP41 'Renewable Energy' with no main issues being raised however English Heritage and the County support the policy.
- 14.8 Around half of the comments received on CP42 'Flood Risk' have objected to the policy mainly stating there is a need for more emphasis on the need for SUDS including maintenance arrangements within the Policy and the IDP. Some specific site related flood risk concerns, mainly related to East Hanney and the likely increase of flood risk due to site allocation.

15. Natural Environment Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 15.1 A strategic objective of the plan is to improve and protect the natural environment including biodiversity. Measures were proposed to deliver protecting landscape features, improving biodiversity and requirements on developers to contribute to the delivery of green infrastructure.
- 15.2 There was broad support for the proposals to afford continued protection from development to green belt land surrounding Oxford City and to encourage a net gain in green infrastructure. Specific comments raised the following issues:
- objection to CP35 as it is not based on objectively defined standards;
 - concern that the proposed south Abingdon-on-Thames bypass would cut across the Ock Nature Reserve;
 - an objection that insufficient biodiversity policies were included;
 - protection of agricultural land had been given insufficient attention;
 - the riverside at Abingdon-on-Thames should be valued as an important leisure asset and developed accordingly;
 - no assessment of the landscape character of the district which defines locally valued landscape;
 - a suggestion that “locally valued landscapes” is defined in a glossary;
 - Natural England would like biodiversity need to be clearer about the criteria that development would be required to meet;
 - Natural England would like to see Green Infrastructure provided in line with Accessible Natural Greenspace Standards (ANGst);
 - the Letcombe Brook project emphasised the importance of adopted Policies L2 and L3 and concern over the loss of these policies;
 - Natural England advised that the Habitats Regulation Assessment needed to include further analysis to support the conclusions that there are likely to be no significant effects on Oxford Meadows SAC, and
 - a recommendation that the plan include reference to planning for open spaces and safeguarding community facilities in line with NPPF.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 15.3 The following changes have been included in the Publication Version of Local Plan 2031:
- the term ‘Locally valued landscapes’ was removed from the Landscape policy so that it is a general policy about landscape features;
 - the Green Infrastructure policy makes reference to the relevant ANGst;
 - the biodiversity policy was reworded;
 - further modelling work has been undertaken to inform the HRA;
 - the green infrastructure policy makes direct reference to the findings of the HRA; and

- the wording of the policies was agreed with Natural England.

Housing Delivery Update 2014 Main Issues

- 15.4 There were no policies in the Housing Delivery Update on the Natural Environment.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 15.5 The Publication Version takes forward the policies proposed in the Draft Local Plan with amendments as explained previously. The relevant policies are Core Policy 43 to Core Policy 46.
- 15.6 No main issues were raised relating to CP43 'Natural Resources', comments related to objecting to the approach to agricultural land and further development at Abingdon will increase air pollution. Oxfordshire County Council did raise that the text within Paragraph 6.107 is not aligned to its strategy for Minerals and Waste and should be amended accordingly.
- 15.7 Over 140 comments were received regarding CP44 'Landscape' with the majority raising major concerns. The main issues raised are as follows:
- exclude development from AONB; around 51 comments highlight there is no exceptional need to build in the North Wessex Downs AONB which is not in accordance with NPPF;
 - exclude development from AONB and green belt; around 43 comments state acceptance of SHMA figures has led to inappropriate allocations within the Green Belt and AONB;
 - few comments raise there is a statutory duty to have regard to AONB and that the AONB has a greater level of protection against development than the Oxford Green Belt;
 - site specific landscape concerns; potential coalescence of Harwell with Didcot, impact on landscape from the East Harwell Site, maintaining village character of Harwell and landscape impact at the North Abingdon Site; and
 - Oxford Views and Setting; English Heritage and the Oxford Preservation Trust share the view that the Plan should include reference to Oxford and the importance of its views and landscape setting and around four comments state the policy should make reference to protecting the green setting of Oxford and the importance of protecting views. The council note that saved Local Plan Policy NE8 covers the setting of Oxford.
- 15.8 In regards to the first three main issues, it is suggested sites be removed from the AONB and green belt, a new policy be introduced on just AONB or an additional paragraph is added to the policy and cross reference provided to the statutory North Wessex Downs AONB Management Plan. The implications of Paragraphs 115 and 116 of the NPPF in respect of development within the AONB should be included.

- 15.9 A few issues were raised through comments on CP45 'Green Infrastructure' relating to concerns that the Green Infrastructure Strategy has yet to be produced to support the Plan and Natural England highlights further work is being undertaken in relation to air quality and impact on Oxford Meadow SAC and advise the HRA is reconciled with that of Cherwell. Objections were raised to development at North Abingdon due to the associated loss of wildlife habitats and adverse impact on neighbouring woodland and SSSI.
- 15.10 A range of comments were received regarding CP46 'Conservation and Improvement of Biodiversity'. Natural England advice on improved wording to reflect the SA which advises the policy refers to a net gain in biodiversity particularly targeting farmland birds and to ensure the wording is effective. Other concerns were raised over specific site impacts on biodiversity (East Hanney and North Abingdon). A few comments suggest reinserting the previous policy on the Wilts and Berks Canal.

16. Green Belt Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 16.1 Policy maintained protection of the Oxford Green Belt and stated that inappropriate development that is harmful would not be approved except where the scheme provides exceptional community benefits that cannot be reasonably provided elsewhere. It also outlined parameters for development on previously developed sites in the Green Belt.
- 16.2 There was broad support for the proposals to afford continued protection from development to Green Belt land surrounding Oxford City. Some specific comments raised the following issues:
- a request from Oxford City Council for the plan to acknowledge that a review of the Green Belt may be required in the period to 2029 should a more up to date assessment of housing take place;
 - a request that the council work in partnership with key stakeholders where there are cross cutting boundary issues;
 - suggestion that retaining Policy GS3 of the Local Plan 2011 alongside Core Policy 9 meant that Core Policy 9 presented an incomplete picture of when development in the Green Belt might be appropriate; and
 - reference to community benefits is significantly broader than what is permitted in Policy GS3.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 16.3 It was acknowledged in the Draft Local Plan that further work was being done to determine a new housing target for the District. In order to meet the new housing target a local Green Belt Review was undertaken to assess to degree to which land meets the five purposes of the Green Belt as set out in national policy. This resulted in a change to the Green Belt policy. Other changes made based on the consultation included:
- removing reference to community benefits as a reason for developing in the Green Belt;
 - including reference to exceptional cases set out in the NPPF, and
 - provided list of settlements inset to the Green Belt, to which Green Belt policy does not apply.

Housing Delivery Update 2014 Main Issues

- 16.4 The majority of comments relating to the green belt were objecting to removing sites from the green belt.

How did the Housing Delivery Update consultation comments inform the Local Plan?

- 16.5 Further changes were made to the wording of the Green Belt policy based on comments from the February 2013 consultation suggesting that Policy GS3 should not be saved but that there should be one strategic policy for the Oxford Green Belt.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 16.6 Over 480 comments were received regarding the green belt raising a number of issues generally and regarding specific sites.
- 16.7 Around 191 comments generally objected to changes to the green belt, raising the following issues:
- objection to green belt boundary changes;
 - a more strategic green belt review should be done;
 - lack of justification in the local plan of the “exceptional circumstances” case as set out in the national policy and guidance;
 - the recommended boundary changes to the green belt do not satisfy the five stated purposes of the designation;
 - the SHMA figure is excessively high and should be reduced, thus eliminating the need for any green belt review; and
 - lack of public consultation on the local green belt review.
- 16.8 Around 6 comments on the Green Belt generally support the recommended changes to the Green Belt boundaries
- 16.9 A number of comments were received regarding site specific issues, relating to the following:
- 41 objections to the green belt boundary changes around Abingdon-on-Thames; changes to the north and north east would erode the gap with Radley Village, North Abingdon site not consulted upon previously;
 - 2 comments specifically support the green belt boundary changes around Abingdon-on-Thames;
 - 21 object to the green belt boundary changes around Appleton village;
 - 134 object to the green belt boundary changes around Cumnor village; lack of understanding as to why the recommended green belt boundary changes remain and perception that development will damage the village character;
 - 4 comments support the green belt boundary changes around Cumnor;
 - 4 objections to the green belt boundary changes around Botley; specifically Oxford Brooks University seeking removal of green belt land from the built up area of their Harcourt Hill Campus to help facilitate expansion;
 - 7 objections to the green belt boundary changes around Kennington village;
 - 91 object to the green belt boundary changes around Wootton village; land released will impact upon the local distinctiveness; and
 - 2 support the green belt boundary changes around Wootton village.

17. Transport Main Issues

Draft Local Plan 2013 Consultation Main Issues

- 17.1 The plan set out how the council will work with Oxfordshire County Council and others to reduce the need for travel and ensure that new transport infrastructure is delivered in key growth areas such as Science Vale.
- 17.2 Over 400 transport related comments were made. Many comments expressed concern about the stress that new development might place on the existing transport infrastructure. Specific comments raised the following issues;
- a significant number of objections were made to the proposed development at Wantage and Grove as the proposed new roads would not be able to cope with the increase volume of traffic;
 - Network Rail requested that a policy is included within the Local Plan requiring developers to fund improvements to rail infrastructure;
 - support for a new railway station serving Wantage and Grove;
 - concerns about a perceived disconnect between the proposed location of new homes and sites for employment;
 - objections to the South Abingdon-on-Thames bypass due to the significant impact on the environmental and heritage assets at Culham;
 - support to restrict development at Abingdon-on-Thames due to highways constraints in the town;
 - requests that footpaths and cycle paths are provided to connect new residential development with places of employment;
 - make reference to delivery of bus priority measures; and
 - criticism that the plan places too much emphasis on travel by car.

How did the Draft Local Plan 2013 consultation comments inform the Local Plan?

- 17.3 The Local Plan has been informed by an Evaluation of Transport Impacts (ETI) Study. This has been prepared iteratively and so has informed each stage of preparing the local plan. The ETI helps to ensure the council understand these impacts, working with Oxfordshire County Council and independent consultants, to ensure that appropriate mitigation and actions are identified to minimise any harmful impacts. The council has given consideration to the comments received at consultation and has continued to work with OCC and consultants to refine mitigation.
- 17.4 In terms of the specific points listed above, these have been addressed in the following ways:
- Development at Wantage and Grove; package of measures to help to mitigate impacts including delivery of the Wantage Eastern Link Road, developing strategies for the A417 and A338, developing a cycle

strategy for the area, and plans are also in place to increase bus frequency;

- Railway Services; any specific projects will be added to the Infrastructure Delivery Plan and covered by CP7 (previously Core Policy 5). The council continues to support the re-opening of a railway station at Grove with a specific policy to this effect (Core Policy 19);
- Location of housing and employment; the package of sites has since been updated with additional sites in close proximity to employment sites, therefore the relationship has been increased;
- Abingdon-on-Thames; it is important to safeguard the route for a southern bypass of Abingdon-on-Thames however it is made clear that the safeguarded route is indicative, and any final route would need to be informed by a detailed feasibility study;
- Footpaths and Cycle Ways; OCC are developing a cycling strategy for the Science Vale area and the Publication Version Local Plan 2031 Part 1 includes a specific policy to facilitate the delivery of further cycle ways;
- Bus Priority; detailed work has been undertaken to examine the feasibility of developing a priority bus scheme between certain areas. Proposals are being taken forward as part of the wider Science Transit Initiative which is a wider proposal being championed by the Local Enterprise Partnership (LEP) to make significant enhancements to public transport in the knowledge spine in Oxfordshire.

Housing Delivery Update 2014 Main Issues

- 17.5 The consultation was not specifically focused on transport however comments were received that raised issues on transport in relation to the new site proposals. The comments followed a similar theme to those to the Draft Local Plan consultation and in particular, raised concerns over the capacity of the network to cope with additional traffic, particularly on the A34, A417, A338, A420 and at locations in Botley, Abingdon-on-Thames and Didcot. Many respondents stated that incidents on the A34 lead to associated impacts on the surrounding local road network.

How did the Housing Delivery Update 2014 consultation comments inform the Local Plan?

- 17.6 The ongoing ETI work to inform the Local Plan 2031 is described above along with some information about how the plan has changed following consultation. In addition, some specific 'additional' infrastructure has been added to the Publication Version (please note that this list is additional to a comprehensive package of infrastructure already identified and included within the Local Plan 2031):
- Science Bridge; a new bridge across the railway line at Didcot;
 - dualling the A4130 at Milton interchange and Science Bridge;
 - new crossing of the Thames south of Culham and linking to the A4130, thus providing an alternative route to the south and east of Oxford without using the A34, and

- upgrade to the A34 interchange at Lodge Hill.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 17.7 The Publication Version has expanded the policies on transport to ensure matters are appropriately addressed and to reflect previous consultation comments. The relevant district wide transport policies are Core Policies 33 to 35. Relevant policies on area specific transport infrastructure are included within the relevant Sub Area Strategy which are policies CP12, CP17, CP18, CP19, and CP21. The outcome of the consultation in regards to these policies is explained in the relevant Sub Area Strategy section below.
- 17.8 Generally a number of issues were raised regarding transport throughout comments on the Plan, in particular on specific sites; these issues are explained within the relevant sub area strategy section below.
- 17.9 In relation to CP33 'Promoting Sustainable Transport and Accessibility' the main issues raised related to the provision and delivery of highway infrastructure and traffic congestion. This reflected the following;
- the policy is unsound as it does not include a commitment to deliver transport infrastructure before homes are built;
 - the plan makes inadequate provision for transport infrastructure;
 - no credible plan to deliver the core transport policies;
 - the IDP appears to increase road capacity to accommodate more traffic however this will only serve to increase noise and pollution;
 - the plan should look to reduce the number of car journeys;
 - more focus to make modal transfer as easy as possible;
 - congestion on A34, A415, A417, A420 and A4130 is already at or above capacity in peak periods;
 - commuter rail services to London are already inadequate; and
 - reference should be included in the policy to show how and how often air quality will be monitored/
- 17.10 A few representations of support were submitted by statutory consultees as follows:
- Oxford City Council supports CP33 and in particular clause iv 'support improvement for accessing Oxford'; and
 - County Council raise awareness of the emerging Local Transport Plan (LTP 4) and would welcome discussion in the lead up to the examination so that appropriate elements of emerging LTP can be included in the Local Plan.
- 17.11 The comments received in regards to CP34 'A34 Strategy' raised mains issues relating to the following;

- Air quality; does not identify what ‘further measures’ and monitoring would be required to monitor impacts of air pollution upon the Oxford Meadows Special Area of Conservation in line with HRA;
- Delivery of highway infrastructure; diamond interchange at Lodge Hill and additional lanes between M40 and Chilton are needed; and
- Relationship between proposed growth, A34 Strategy and congestion; unsound to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB given the A34 will be a major barrier to economic growth.

17.12 Support was received from Oxford City Council and West Berkshire District Council suggested wider improvements considered for the A34 should look beyond the Vale’s boundary down to the A34 at Chieveley.

17.13 A range of issues have been raised through comments on CP35 ‘Promoting Public Transport, Cycling and Walking’ with the main issues relating to;

- Stagecoach state the Plan is highly focused on providing for car-borne movements first and the policy is non-committal on the imperative to achieve mode shift towards sustainable modes;
- the plan lacks imagination and gives too little attention to cycleways;
- the objective of reducing use of cars is a worthy one however the Plan does not support sustainable public transport enough. Locating development along the main public transport offers the best chance of attracting a high proportion of movement by public transport; and
- increased capacity on the existing bus services will be required as more houses are built.

17.14 West Berkshire District Council supports this policy which appears to fit well with the aspirations for a strategic bus corridor linking Oxford, Didcot, Science Vale with Newbury.

18. Abingdon-on-Thames and Oxford Fringe Sub Area Strategy Main Issues

18.1 The Abingdon-on-Thames and Oxford Fringe Sub Area Strategy includes Core Policy 8 that identifies the following sites:

- North of Abingdon-on-Thames
- North West of Abingdon-on-Thames
- South of East Hanney
- East of Kingston Bagpuize with Southmoor
- North West of Radley
- South of Kennington

18.2 Comments and main issues raised for each of these sites are detailed below. Those sites that have been removed are briefly explained below. For detailed comments on all sites, please see the Consultation Statement (October 2014) that accompanied the Publication Version of the Local Plan 2031 Part 1 and the Strategic Sites Selection Topic Paper 3 which sets out the site selection process throughout Plan preparation in detail.

North of Abingdon-on-Thames Site

Main Issues raised through previous Consultations

18.3 This site was introduced through the Housing Delivery Update Consultation for up to 410 dwellings along with contributions to appropriate infrastructure including an upgrade to the A34 junction at Lodge Hill to have both south and north facing slips and a 1.5 form entry primary school.

18.4 Around 23 comments were received reflecting the main issues summarised below. It should be stated that some comments were positive, including a comment from the 'Friends of Abingdon' who 'accept' the arguments for the proposed development providing the proposals are supported by appropriate infrastructure. Specific comments included:

- it was stated that development viability had not been tested;
- concern over the importance of delivering supporting infrastructure;
- concern over the existing traffic levels and proximity to the A34 and the need for appropriate noise mitigation;
- the loss of Green Belt land was identified as a particular concern;
- concern over the risk of surface water flooding on the site; and
- Thames Water stated that an upgrade to the waste water network would be needed if the development were to proceed.

How did consultation comments inform the Local Plan?

18.5 The council recognise the emotive nature of recommending development proposals within the Oxford Green Belt. However, a local Green Belt Review has been carried out and concludes that development to the north

of Abingdon-on-Thames would not lead to a negative impact on the integrity of the Green Belt.

- 18.6 Overall, the site to the north of Abingdon-on-Thames is thought to be the most suitable and sustainable location for development within the largest settlement within the Vale, which offers an excellent range of services and facilities, and is in close proximity to the City of Oxford and where there is already excellent public transport connectivity.
- 18.7 The council recognises the importance of delivering supporting infrastructure. The council is working closely with Oxfordshire County Council and the Highway Agency to develop plans for the A34 upgrade and is preparing a detailed feasibility study. The Evaluation of Transport Impacts (ETI) Study concludes that development to the north of the town would be acceptable and that the Lodge Hill upgrade would have wider benefits.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.8 Since the Housing Delivery Update consultation, the council has undertaken a more detailed Landscape Capacity Study and conclude that further development would not lead to harmful impacts. The council has therefore increased the strategic allocation at North of Abingdon-on-Thames to around 800 homes.
- 18.9 Over 200 comments were received regarding this site and the following main issues were raised;
- Green belt land should only be used in extreme circumstances, which this is not and the site contains historic and cultural significance;
 - at present there is not sufficient infrastructure to deal with the increased population volume;
 - development would destroy Abingdon's sense of place, urban sprawl could destroy Abingdon's unique character and result in significant encroachment into the countryside;
 - A34 is already at full capacity, will form a continuous urban mass to the A34, pinch point at Wootton Rd roundabout is unlikely to be relieved and generally increased congestion, noise and air pollution;
 - Oxford City Council is not wholly satisfied that land to the east of the A4183 is appropriate for development, until a joint approach to Green Belt review is taken;
 - comments stating the bypass would relieve greater traffic congestion, link up to Science Vale and provide greater expansion of Abingdon in a radial manner;
 - cycling/walking is unrealistic to access employment in the south and no buses serve the area;
 - the eastern extension of the site lies entirely in the Parish of Radley and is part of the setting for Radley College Mansion House.
 - concerns about the impact on the River Sturt, will cause water runoff and a reoccurrence of flooding;

- All developments and supporting infrastructure should be scaled to the local residents needs and not add to congestion or pressures to local services
- landscape to the north of the town provides a natural rim to the town, the site will result in a substantial visual intrusion into the open countryside and potential impact of the future of Blake's Oak and close proximity of Sugworth SSSI.
- Few comments stating the area offers good connectivity to Oxford and key employment sites;
- poor community involvement does not meet the requirements of the Statement of Community Involvement;
- Oxfordshire County Council have stated development would be expected to contribute towards potential delivery of south facing slips on A34 at Lodge Hill, concern of capacity of local roads (Oxford Road and Wootton Road roundabouts, Dunmore Road), contributions should be secured towards future strategic infrastructure improvement for the relief of Abingdon, bus stop infrastructure is required however concerns over impact of south facing slips on bus service;
- Oxfordshire County Council have stated a new 1.5FE school required to accommodate growth at Abingdon which should allow for future expansion if needed and expansion of secondary school and SEN required. Support the provision in the IDP; and
- Thames Water do not envisage infrastructure concerns regarding water supply capability in relation to this site however they do have concerns regarding waste water and has suggested what will be required to overcome this.

North West of Abingdon-on-Thames Site

Main Issues raised through previous Consultations

18.10 This site was introduced through the Housing Delivery Update consultation for up to 200 dwellings along with contributions to appropriate infrastructure. Around 17 comments were received with a number of common themes. Specific comments raised the following issues:

- concern over the impact of development on the highway network;
- concern raised over the importance of providing infrastructure;
- proximity to the A34 and concern over the need for noise mitigation;
- concern also raised over the risk of surface water flooding;
- support was received for the development from the 'Friends of Abingdon' providing appropriate supporting infrastructure is delivered; and
- the loss of Green Belt land was a common concern.

How did consultation comments inform the Local Plan?

18.11 The settlement of Abingdon-on-Thames is a highly sustainable location for development. The local Green Belt Review and Landscape Capacity Study

both conclude that the site is suitable for development. The site has been investigated in the council's Strategic Flood Risk Assessment and Sequential Test and does not have evidence to justify precluding the proposed allocation.

- 18.12 The council acknowledges the importance of providing appropriate supporting infrastructure alongside development. The Development Site Template sets out the policy requirements for the site and makes clear where contributions to infrastructure are necessary or where on-site constraints need investigating and mitigating.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.13 The council have proposed the same amount of housing on this site as to the previous consultation, for 200 homes.

- 18.14 A few comments were received specifically regarding this site with the following issues raised;

- objections relating to the traffic impact this development will have on Dunmore Rd & Twelve Acre Drive, limited ability to improve the centre due to heritage assets, green belt will be eroded, no natural barrier between Abingdon and Radley and no additional infrastructure has been planned in regard to employment, health and transport;
- Thames Water do not envisage infrastructure concerns regarding water supply capability in relation to this site however they do have concerns regarding waste water and have suggested what will be required to overcome this;
- Oxfordshire County Council has stated a new 1.5FE school required to accommodate growth at Abingdon which should allow for future expansion if needed and expansion of secondary school required. Support the provision in the IDP; and
- Oxfordshire County Council have stated development would be expected to contribute towards potential delivery of south facing slips on A34 at Lodge Hill, concern of capacity of local roads (Oxford Road and Wootton Road roundabouts, Dunmore Road) and contributions should be secured towards future strategic infrastructure improvement for the relief of Abingdon. Currently no bus service on this section of Wootton Road and thus the developer would contribute to the cost of an additional hourly bus service between Abingdon and Cumnor routed along the Wootton Road.

South of East Hanney

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.15 This site has been proposed within the Publication Version as an alternative to the East of East Hanney allocation which has been removed as is deemed more suitable. The site is allocated for 200 homes.

18.16 Around 250 comments were made in regards to this site. The majority of comments raised objections or concerns, with the following issues being raised:

- East Hanney was determined to be a larger village, this is not correct as it does not have the facilities;
- will completely alter the character of the Hanneys;
- A338 is set to become even busier with the planned developments at Wantage and Grove thus additional direct access is needed to the A338 to reduce traffic congestion;
- St. James' primary school is already at full capacity;
- the site will set a precedent for uncontrolled expansion of the village;
- the plan moves development from east of the village to south without any explanation as to why this has happened and without either communication or consultation;
- water drainage is major concern for the village;
- the villagers were completely unaware of the shift in sites;
- local services are already closing and need of improvement;
- the land is also of archaeological interest;
- the land to the South of East Hanney (EHAN05B) is shown as being undeliverable;
- the proposal does nothing to enhance Conservation Area;
- far better site would be between the school and West Hanney north and south side of the road;
- does not take into account the full extent of flood risks (NPPF);
- host to a wealth of flora, fauna and ancient orchard, whilst the eye line from the southern boundary of the village provides an unspoilt view of the Downs by day;
- No significant business situated in the village;
- the development should be reverted back to the east to protect the village's character, environment, tranquillity, and historic nature;
- Oxfordshire County Council state site access can be taken from Summertown, improvements to nearby junctions will be required and site is well located to a bus route although new bus infrastructure will be required and contributions to enhancement of x30 and 31 routes. In regards to education, expansion of St James Primary School and acquisition of land required and expansion of secondary school and SEN required but will be closer to the planned new secondary school at Grove Airfield; and
- Thames Water do not envisage infrastructure concerns regarding Water Supply capability in relation to this site however they do have concerns regarding waste water and have suggested what will be required to overcome this.

Kingston Bagpuize with Southmoor

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.17 This site has been proposed within the Publication Version, Kingston Bagpuize with Southmoor is considered highly sustainable and the site is relatively unconstrained. The site is allocated for 280 homes.
- 18.18 Generally the majority of comments received on this site were either supports or comments from statutory consultees seeking clarity.
- 18.19 Comments of support stated the site was ready for immediate development and early development will help the council meet its housing targets, and the site is suitable and deliverable. Local businesses have raised support stating the council have undertaken a robust and thorough exercise in determining the future housing needs, works well with the village layout, will have almost no environmental impact and the site will help sustain employment and facilities in the village. It has been suggested the site can accommodate 500 dwellings. Stagecoach have raised an opportunity to enhance service 66 due to the additional development.
- 18.20 English Heritage have raised that Aelfrith Ditch may still be of national significance and thus would welcome an additional principle in the development template.
- 18.21 Natural English have raised concerns over whether a detailed landscape study has been undertaken and thus it is unclear how much development can be provided and therefore the allocation is unjustified.
- 18.22 Oxfordshire County Council has raised comments regarding school provision. The existing capacity at John Blandy Primary School would not meet demand and would require an extension to a 1.5 FE requiring acquisition of land and expansion of SEN and Faringdon Community College which is already planned. In regards to transport issues, the capacity and performance of the A420 route corridor was raised as an issue and that contributions should be sought towards infrastructure improvement on this route.
- 18.23 Thames Water has highlighted that existing sewage treatment capacity in this area is unlikely to be able to support this development and raised concerns over water supply. They have suggested what will be required to overcome these issues.

South of Kennington (Radley Parish)

Main Issues raised through previous Consultations

- 18.24 This site was introduced through the Housing Delivery Update consultation for up to 270 dwellings along with contributions to appropriate infrastructure.
- 18.25 Around 91 comments were received largely objecting for a series of reasons, in particular, it is noted that whilst the site lies to the south of

Kennington and adjoins the village of Kennington, it is located within the parish of Radley. Specific comments raised the following issues:

- concern of the cumulative impact on Radley;
- concern raised on the impact of the Green Belt and landscape setting;
- impact on the local highway network;
- importance of ensuring development is supported by appropriate infrastructure;
- concern over the local primary schools ability to expand; and
- Thames Water stated that an upgrade to the waste water network would be needed if the development were to proceed.

How did consultation comments inform the Local Plan?

- 18.26 The council considers that the larger villages of Kennington and Radley are sustainable locations for development. However, the council also acknowledges comments raised particularly concerns over cumulative impact on Radley. Given the number of homes to be identified through strategic allocations has been reduced, it was identified that some proposed strategic allocations, were no longer required. On this basis, it is proposed that the North Radley site is no longer proposed for so the overall impact on Radley is significantly reduced.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.27 The council have proposed the same amount of housing on this site as to the previous consultation, i.e. 270 homes.
- 18.28 A number of objections were raised by members of the public whilst a few representations of support were raised too. Objections related to the use of green belt land, loss of rural views, the allocation being too high, local services and infrastructure not being adequate and there is little evidence from agencies and services that the necessary changes will be in place in a timely manner.
- 18.29 The few supports received stated the site is in a highly sustainable location, the site is deliverable, strong links with Oxford; however it is suggested the trajectory be modified to incorporate a more positive delivery trajectory for this site.
- 18.30 Oxfordshire County Council has provided comments regarding school provision, with a solution underway in regards to primary school capacity and a feasibility study underway to assess school capacity at Matthew Arnold School. In terms of transport they state that development will be expected to contribute towards potential delivery of south facing slips on A34 at Lodge Hill; principle access should be obtained from Kennington Road; the paths to the nearby bus stop are needed, and, a contribution to enhancing the Abingdon-Kennington-Oxford bus route is required.

- 18.31 Thames Water does not envisage infrastructure concerns regarding water supply capability in relation to this site however they do have concerns regarding waste water and has suggested what will be required to overcome this.

North West of Radley Site

Main Issues raised through previous Consultations

- 18.32 The site was introduced through the Housing Delivery Update consultation for up to 240 dwellings with contributions to appropriate infrastructure.
- 18.33 Around 45 comments were received with the majority of comments objecting. Specific comments raised the following issues:
- concern of the cumulative impact on Radley;
 - concern raised on the impact on the Green Belt and landscape setting;
 - another common theme was the impact on the local highway network;
 - ensuring development is supported by appropriate infrastructure;
 - concern over the local primary schools ability to expand;
 - concern was raised over the capacity of Sandford Lane and anecdotal evidence was presented about the vulnerability of this road to flooding;
 - opportunities were also raised for improving car parking and use of the railway station at Radley; and
 - Thames Water stated that an upgrade to the waste water network would be needed if the development were to proceed.

How did consultation comments inform the Local Plan?

- 18.34 The council considers that the larger village of Radley is a sustainable location for development. However, the council also acknowledges comments raised and particularly concerns over cumulative impact on Radley. Given the number of homes to be identified through strategic allocations has been reduced by commitment and completions, and the identification through consultation of potentially preferable alternatives, it was identified that some proposed strategic allocations were no longer required. On this basis, the North Radley site is no longer proposed for strategic development, so the overall impact on Radley is significantly reduced

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.35 The council have proposed the same amount of housing on this site as to the previous consultation, for 240 homes.
- 18.36 A range of comments were received regarding the site at North West Radley. A number of objections were received raising the following issues:
- site is green belt land, which is unacceptable;

- residents will be forced to drive to their place of employment;
- inadequate infrastructure to support development;
- detrimental to local protected wildlife;
- there would be a loss of quality agricultural land;
- the original 500 objections to the first draft have been counted as one;
- No extension was offered for public response;
- remodelling the junction on A34 at Lodge Hill will lead to increased traffic through Radley and so some account of this must be taken; and
- Thames Water do not envisage infrastructure concerns regarding water supply capability in relation to this site however they do have concerns regarding waste water and have suggested what will be required to overcome this.

18.37 Support for certain principles was given by English Heritage and support received from the freeholder on the council's overall approach to meeting objectively assessed housing needs. It has been suggested there is scope to extend the allocation comprising an amalgamation of both the North and North West Radley sites.

18.38 Oxfordshire County Council has given comments regarding school provision: the Radley Primary School would need expanding as it is below the minimum size for a 1FE and thus acquisition of additional site area is needed (potential viability concerns); and expansion of SEN and secondary school at Abingdon is required. Their comment also related to transport issues, in particular: expected contributions towards the potential delivery of slips at Lodge Hill on the A34; principle access to site would be from White's Lane which has poor alignment and would need highway improvements; bus infrastructure improvements; and, enhancement to the Abingdon-Kennington-Oxford bus route. In relation to the primary school, the Governors of Radley Primary School have expressed they would favour an expansion to 1 FE.

Removed Sites

18.39 South Cumnor, East of East Hanney, East Wooton, North Radley, South Drayton and South Marcham were all identified within the Housing Delivery Update Consultation as potential sites. Subsequent to that consultation, the consultation responses have been considered, and suggested and potentially preferable alternatives assessed, further evidence base studies have been undertaken, and the need for homes to be identified through strategic allocation has been reduced due to an increase from other housing sources has all led to these sites being removed. The main reason are as follows:

- South Cumnor and East of Wooton; objections were received regarding impact on wildlife and landscape and the Landscape Capacity Study concluded that the sites were only suitable for the development of 60 and 50 dwellings respectively;

- East of East Hanney; the site is segregated from the facilities offered in the village by the A338 with an alternative site is considered to be more successful in achieving such integration;
- North Radley; comments raised concerns over the cumulative impact on Radley from a number of site allocations and the Landscape Capacity Study and local Green Belt Review did not recommend development at this site;
- South Drayton; a number of comments raised that a Neighbourhood Development Plan is being prepared for Drayton, where the community has identified a preference to allocate housing on three sites within the village, rather than allocate a single large site; and
- South Marcham; objection received from a statutory consultee highlighting concern over the quantum of development and the need to recognise the importance of protecting the historic environment and the importance of ensuring that development is supported by appropriate infrastructure.

18.40 The above sites are still considered sustainable sites, suitable for development however due to the concerns raised above they are not considered appropriate for Local Plan 2031 Part 1 but may be considered for allocation within Local Part 2031 Part 2.

Core Policy 8

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.41 General comments raised regarding Core Policy 8 reflected those already mentioned regarding individual sites, mainly the sites within the green belt and AONB should be removed as they will have a detrimental impact.
- 18.42 Also a number of general comments were received regarding the growth of Abingdon stating: development will severely affect Abingdon's historic settlement; Abingdon cannot cope with the extra traffic demand; the Diamond interchange at Lodge Hill is required before any development commences; decrease the viability of the town centre; and, no park and ride services are available to the town.

Core Policy 9

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.43 A few comments were received regarding CP9 'Harcourt Hill Campus'.
- 18.44 English Heritage welcomes the inclusion of key site issues specifically in regards to long distance views and Oxfordshire County Council supports additional student accommodation at Harcourt Hill. Oxford City Council noted their interest in the site and the Parish Council seek a transport solution to reduce traffic before any development plans.

- 18.45 Three comments raised objections to the policy, with two comments requesting the need for the policy to reference the need for a Transport Assessment and one comment on the importance of sports facilities. Oxford Brookes University stated that the policy is not as positively written as previous draft iterations.

Core Policy 10

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.46 Around 5 comments were received regarding CP10 'Abbey Shopping Centre and Charter, Abingdon-on-Thames' with no main issues being raised however there were a few requests to identify additional and/or potential sites in Abingdon-on-Thames to accommodate the remaining retail need.

Core Policy 11

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.47 Over 80 comments were received regarding CP11 'Botley Central Area' mainly objecting to the policy. The following issues were raised:
- what is the justification for Botley being regarded as a 'central area';
 - main purpose for upgrading Botley should be to support local needs;
 - Botley is not a town centre like Faringdon and therefore comparisons are irrelevant;
 - Elms parade is not in need of refurbishment, has full occupancy and is architecturally significant for Botley;
 - Oxford University state the development will enhance Botley's sustainability credentials as a local service centre;
 - English Heritage state Elms Parade is a local heritage asset and this should be represented in para 5.31. Also CP11 fails to address any adverse impacts of views to and from Oxford and criteria 4 needs to be more positive;
 - West Way Community raised a number of concerns, they state the policy has been written directly to support 'comprehensive redevelopment' of Botley Central Area and sets out the conditions whereby such a redevelopment would be supported; and
 - Oxford City Council state the designation of Botley is not clear as CP11 aims for self-containment, which is unnecessary due to the proximity of Oxford.

Core Policy 12

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.48 A number of comments regarding CP12 'Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area'. The main issues raised related to the following:

- Infrastructure Delivery; insufficient provision on the timescale and finances to upgrade local facilities.
- Upgrade of Lodge Hill; A34 is already congested and more traffic will bring more congestion and continual gridlock, and proposed funding through LEP, CIL and H/A is also flawed and unlikely. The Highways Agency state if improvements at Lodge Hill are required for proposed growth then south facing slips would be required early in the phasing and the IDP should be amended to reflect this;
- safeguarding of land for the South Abingdon Bypass; objection due to environmental and noise impact and congestion, and no funding has been secured for the project; and
- traffic congestion; fails to address traffic congestion in specific locations, concerns over specific roundabout/lane improvements, and noise and air pollution problems will be difficult to mitigate.

18.49 In addition to the above, comments were made from English Heritage, Oxfordshire County Council, Oxford City Council and South Oxfordshire District Council. English Heritage raised concerns over the impact of the bypass on Sutton Wick settlement site Scheduled Monument, the County raised the potential of environmental impacts of improvements and highlighted the emerging transport strategy in relation to the park and ride site, and Oxford City Council noted their interest in highways improvements. Also, in general Stagecoach supports the policy.

Core Policy 14

Publication Version of Local Plan 2031 Part 1 Main Issues

- 18.50 A range of comments were received regarding CP14 'Upper Thames Reservoir'. Adjoining authorities Oxford City Council and Swindon Borough Council support the policy to ensure water infrastructure provision for the wider area.
- 18.51 English Heritage suggest the policy should include an additional criterion requiring any proposal for a reservoir to minimise the effect on the archaeological significance of the site in line with NPPF.
- 18.52 Around 7 objections were received stating land should only be safeguarded until 2019, potential for significant environmental impacts, and a smaller reservoir could be accommodated.
- 18.53 Thames Water support the safeguarding however state this option has not been confirmed as the preferred option and thus uncertainties still remain until further work is undertaken. Also they consider it is essential the safeguarded area includes the ancillary works including the areas of land required for the diversion of the Hanney to Steventon Road and the Wilts and Berks Canal. Oxfordshire County Council have also raised the question as to why the alternative option on land at Longworth¹ has not been safeguarded.

19. South East Sub Area Strategy Main Issues

19.1 The South East Sub Area Strategy includes Core Policy 15 that identifies the following sites;

- Crab Hill (North East of Wantage and South East Grove)
- Grove Airfield
- Monks Farm (North Grove)
- Valley Park
- North-West of Valley Park
- East of Harwell Campus
- North-West of Harwell Campus
- West of Harwell
- Milton Heights
- East of Sutton Courtenay

19.2 Comments and main issues raised for each of these sites are detailed below. Those sites that have been removed are briefly explained below. For detailed comments on all sites, please see the Consultation Statement that accompanied the Publication Version of the Local Plan 2031 Part 1 and the Strategic Sites Selection Topic Paper 3 which sets out the site selection process throughout Plan preparation. Grove Airfield is a saved policy therefore no comments are provided below.

Crab Hill (North East of Wantage and South East Grove) Site

Main Issues raised through previous Consultations

19.3 This site has been proposed since the Preferred Options Consultation in 2009 and has been within the Draft Local Plan and the Housing Delivery Update Consultation. It was proposed to deliver up to 1500 new homes with associated services and facilities including a new primary school.

19.4 Over 80 comments were made regarding the site within the Draft Local Plan. Some objected particularly to the loss of high quality agricultural land and perceived impact on wildlife and the surrounding landscape. The most common objection however related to concerns about the anticipated increase in traffic with many having doubt that plans to upgrade the road infrastructure would provide sufficient relief. Respondents also felt that the new development would impact on the historic character of the market town of Wantage. Specific comments raised the following issues:

- advice from the Environment Agency to create a drainage strategy for the site and ensure that upgrades to the sewage network are planned;
- caution from Natural England as site is adjacent to the North Wessex Downs AONB and could cause adverse impact;
- request from English Heritage for the council to produce a heritage statement considering how the proposed development will mitigate impact on the Wantage Charlton Conservation Area.

How did consultation comments inform the Local Plan?

- 19.5 This site is considered to represent the most sustainable location for providing additional housing in the town of Wantage. Consultation comments relating to specific constraints have been addressed and have informed the masterplan that has been developed for the site. Since the consultation an outline planning application has been received by the council and was a 'resolution to grant planning permission subject to legal agreement' in February 2014.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 19.6 The council has proposed the same amount of housing on this site as in the previous consultation (1500 homes) which also reflects the outline planning application.
- 19.7 Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development, raised concerns regarding water supply and has suggested what will be required to overcome this.
- 19.8 Oxfordshire County Council state the site must provide a spine road through the development for bus operation and contribute to infrastructure and provide direct bus links. Support for education provision as set out in the IDP.
- 19.9 Only a few comments were received regarding the site at Crab Hill with two main issues being raised; there should be significant employment provision to reflect such large scale housing and although the delivery of the allocation has been stalled, it will still be delivered within the Plan period.

Monks Farm (North Grove) Site

Main Issues raised through previous Consultations

- 19.10 This site was within the Draft Local Plan and was taken forward within the Housing Delivery Update Consultation. It was proposed to deliver up to 750 homes and 6 hectares of employment land. It was intended that the development would be supported by a new primary school and link road from the A338 to the proposed Grove Airfield development.
- 19.11 Respondents on the Draft Local Plan drew attention to the impact that the proposed development would have on the character of Grove, landscape and wildlife. Particular concerns were raised about the potential risk of flooding which may be exacerbated by the building of new homes if drainage is not improved.
- 19.12 Specific comments included:

- concerns about the ability to integrate the proposed development with the existing settlement and over development of Grove;
- support from the Wilts & Berks Canal Trust on proposals for the restoration of the historic canal route;
- there are particular restrictions to the site which may need to be overcome (noise from railway, odour from the sewage plant and ecological value of Letcombe Brook);
- requirement from the Environment Agency for upgrades to the sewer network to enable connection to sewage treatment works; and
- advice from English Heritage that there are Grade II listed buildings on the site.

How did consultation comments inform the Local Plan?

- 19.13 Overall, the site is deemed to be a highly sustainable location being adjacent to one of the Vale's largest settlements. The council notes the consultation comments and has ensured any site specific constraints or issues are being adequately addressed. The Development Template for the site includes policy requirements to ensure flooding, the protection of the Letcombe Brook and other identified issues are adequately addressed.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 19.14 The council have proposed the same amount of housing on this site as at the previous consultation: 750 homes.
- 19.15 Thames Water does not envisage infrastructure concerns regarding water supply capability in relation to this site however they do have concerns regarding waste water and have suggested what will be required to overcome this.
- 19.16 Oxfordshire County Council has raised concerns over the current spatial arrangement as less than ideal for bus routing and state that the site must contribute to cost of improved bus links and provide good walking routes to bus stops. The County support education provision as set out in the IDP.
- 19.17 Only 5 comments were received regarding the site at Monks Farm which all supported the allocation in principle. Comments did suggest increasing the numbers at the site to 825, providing 6ha of employment land in recognition that non-Class B Uses would be capable of delivering new job and economic growth opportunities. Discussions with OCC have taken place to ensure there is sufficient land for the primary school to extend,

Valley Park Site

Main Issues raised through previous Consultations

- 19.18 This site was within the Draft Local Plan and was taken forward within the Housing Delivery Update Consultation. It was proposed to deliver 2150

homes with provision for 2 new primary schools, a neighbourhood centre, link road between the A4130 and the A417 and learning centre.

19.19 Some respondents objected to the scale of development proposed as many felt that it would erode the distinctive rural character of Harwell village by reducing green space separating the village from Didcot. Other specific comments reflected the following:

- support for the development as providing a sustainable location;
- objection to development due to its proximity to the A34;
- concern that the proposed link road is unlikely to be delivered;
- the site should be joined to the regional cycle route;
- the delivery of housing should not be constrained by the ability to secure the new link road; and
- notification from Scottish and Southern Energy that the site is crossed by three electricity pylons.

19.20 The Housing Delivery Update expanded the site boundary to the north west and also to the south so that it connected up with the A417 and thus the site could accommodate up to 2,550 dwellings and provide for the same level of services as identified previously. The extension of the site boundary to the south will help to facilitate the provision of the new Harwell Link Road as far as the A417.

19.21 Comments on this consultation raised very similar issues as to the previous consultation as summarised above. This related to the encroachment of the proposed site on Harwell Village; the impact upon the local transport network and its already congested nature. The site was supported by site promoters stating that more dwellings can be provided on this site within the plan period but they raised concerns with respect to the north west extension to the site, asking for this area to be considered separately.

How did consultation comments inform the Local Plan?

19.22 This site remains one of the most sustainable locations for new housing in the district up to 2031. Specific amendments and additions to the Publication Version include:

- splitting the site into two, that of “Valley Park” with an allocation of at least 2,550 homes, and “North West Valley Park” with an allocation of at least 800 homes;
- Requiring the masterplanning of the two sites in tandem;
- the boundary between the development areas and Harwell village to be carefully treated;
- the extension of the site to the south to allow for the provision of the Harwell Link Road;
- Valley Park to allow for the provision of the Science Bridge to the north;

- Valley Park to contribute towards strategic green infrastructure requirements of Didcot; and
- masterplanning of both Valley Park and North West Valley Park to be in accordance with the Science Vale Action Plan.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 19.23 The council have proposed the same amount of housing on both Valley Park and North West Valley Park as in the previous consultation, i.e. 2,550 and 800 homes respectively.
- 19.24 A number of comments were received in regard to the Valley Park site. These raised the following main issues:
- Oxfordshire County Council has stated these sites will require new high-quality bus services to Didcot station/town centre and to the major employment sites at Milton Park and Harwell. A connecting spine road should be provided to the North West of Valley Park development site to facilitate bus operation;
 - Oxfordshire County Council support the provision of education set out in the IDP, however have concerns about provision if higher numbers were to be delivered;
 - Oxfordshire County Council have suggested amendments to Appendix A to update reference to A4130 capacity enhancements and refer to the fact that OCC have secured the money for, and are delivering, the Harwell Link Road which should be made clearer in the text;
 - coalescence with nearby villages from the proposal and safeguarding of land for the Southern Didcot Perimeter;
 - the scale of growth as set out in the plan is challenged, suggesting the site can deliver more than 2,550 dwellings; and
 - Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support development of both sites and raises concerns over water supply capability and has suggested what will be required to overcome this.
- 19.25 There were additional comments that raised concern over the need to maintain the separate identity for Harwell village which is being encroached by Valley Park.
- 19.26 A number of comments were received in regards to the North West Valley Park Site. These raised the following main issues:
- The owner of the site identifies the opportunity for the development to be highly sustainable and be well linked with excellent public transport connections;
 - Oxfordshire County Council stated: the site will require a high-quality public bus service, probably routing a service through Milton Park, through Valley Park, and through Didcot town centre; there should be

- adequate access to the site; and raise their concerns over cumulative impacts on the wider transport network; and
- Oxfordshire County Council have raised the same issues for education as stated for the Valley Park site above.

Harwell Campus (North Harwell Campus and East of Harwell Campus Sites)

Main Issues raised through previous Consultations

- 19.27 The North of Harwell Campus site was within the Draft Local Plan and was taken forward within the Housing Delivery Update Consultation. In the Draft Local Plan it was proposed to deliver 400 homes to create a self-sufficient and sustainable development. The development would include the refurbishment of about 120 existing homes and include 40% affordable housing.
- 19.28 The council received a mixture of representations on the development proposed for this site. Specific comments raised the following issues
- a desire for new development to make use of renewable energy;
 - concern that development at this site will not yield developer contributions for amenities within existing neighbouring communities;
 - concern that the development will cause traffic congestion;
 - support from the Harwell Campus Partnership;
 - objection from North Wessex Downs AONB as the site is within a protected landscape and does not meet requirements of the NPPF; and
 - advice from the Environment Agency that the development lends itself to drainage using Sustainable Urban Drainage Systems
- 19.29 The Housing Delivery Update Consultation did not include Land to the North of Harwell Campus as it was advised the site was not available for development. As a part replacement a proposed allocation of 1,400 dwellings (potential for up to 3,400 dwellings in total beyond the plan period) on land east of Harwell Campus was added.
- 19.30 Around 103 responses were received relating to this site with specific comments raising the following issues:
- impact on the AONB and the rural character of the area (including a detailed objection received by the North Wessex Downs AONB management board);
 - capacity of the existing wastewater facilities in the area;
 - cumulative impact of development in Harwell parish;
 - future residents of this site would not actually be employed on the campus;
 - increase in traffic in the area; and
 - the site should be sensitively planned to minimise the impact on the local and wider landscape.

19.31 An alternative site to the south was submitted for consideration.

How did consultation comments inform the Local Plan?

19.32 Additional landscape work (Harwell Campus Landscape and Visual Impact Assessment) was commissioned by the council to determine to what extent the land east of Harwell Campus could accommodate land for housing development, and what would be required to adequately mitigate the visual impact of this development on the AONB. This work concluded that part of the land to the east of the campus could accommodate some development without harming the scenic quality of the AONB. The following amendments were made to the Publication Version of the Local Plan:

- a smaller area to the east of the campus for development proposed for allocation;
- the north western site has been expanded from an allocation of 400 to 550 to maximise this part-brownfield land;
- an advance planting strategy is required to ensure that any adverse impacts on the setting of the AONB are mitigated against;
- a high quality bus service to Didcot will be required in addition to a network of footpaths and cycle ways;
- a new primary school is required; and
- a detailed water supply strategy will be required for the site, in addition to an upgrade to the sewer network.

Publication Version of Local Plan 2031 Part 1 Main Issues

19.33 Since the February 2014 consultation, the north of Harwell Campus site has been confirmed as being available for housing development and thus has been included in the Publication Version for 550 homes which will maximise the brownfield site. The council have reduced the amount of housing on the East of Harwell Campus to 850 homes, as explained above.

19.34 A significant number of comments were received regarding both these sites. Around 470 objections raised the following issues:

- heritage considerations; development would harm the landscape and historic environment in relation to important views, natural features, tranquillity, noise and light pollution;
- landscape, AONB & Green Belt considerations; development will undermine the rural character of the Vale, there are viable alternatives, sites should be removed, the proposals fail to protect this sensitive landscape, lack of justification for an unprecedented level of housing within the AONB, and would irreversibly destroy a protected irreplaceable landscape;
- impact on Chilton; 425 of 850 houses proposed for East Harwell Campus would be in Chilton parish and there has been no assessment

of cumulative impacts of the proposed developments, coalescence with Chilton and lack of infrastructure;

- road network concerns; impact on A34 and local road network, congestion and improvements will be required;
- Harwell Campus; needs supporting physical infrastructure, is an employment site, not an existing community, are few shops, services or associated facilities and number of projected new jobs at Harwell Campus is over-estimated; and
- Other considerations; the proposal does not include associated infrastructure of schools, shops, doctors etc, increased levels of pollution, LVIA has several errors, and acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites.

19.35 Other comments were received, which raised the following main issues:

- English Heritage welcome certain principles;
- around 14 respondents supported development of the Harwell sites;
- Natural England's principal concerns are the likely impact on the landscape character, special qualities and natural/scenic beauty of the North Wessex Downs (NWD) Area of Outstanding Natural Beauty (AONB) and people using The Ridgeway National Trail (NT) and surrounding public rights of way network. They state policies relating to these sites are unsound in that they are not justified as being the most suitable locations for development when considered against reasonable alternatives.
- Oxfordshire County Council states satisfactory access could be achieved for East of Harwell Campus however raises concerns over access for North of Harwell. Contributions would be expected towards the Science Vale strategic transport infrastructure package. Also both sites would need to contribute to the cost of some form of bus way and contribute to the funding of any additional vehicles required to serve the residential areas.
- Oxfordshire County Council support the education provision set out in the IDP (raised query over cost) and state the location of primary schools should maximise accessibility; and
- Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raised concerns over water supply and has suggested what will be required to overcome these.

West of Harwell Site

Main Issues raised through previous Consultations

19.36 The site was introduced through the Housing Delivery Update consultation for up to 200 homes with contributions to appropriate infrastructure.

19.37 Around 25 comments were received and specific comments raised the following issues:

- impact of cumulative development in the area;
- impact on the transport network;
- impact on local services and utilities;
- impact on the landscape as a result of this development; and
- support from landowners with respect to the proposed site, highlighting the sustainable location and minimal impact on the AONB.

How did consultation comments inform the Local Plan?

- 19.38 The council considers that Harwell village is a sustainable location. Other specific points raised through the consultation are addressed through the Development Site Templates. This sets out how the site should be planned to ensure site specific constraints are adequately addressed.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 19.39 The council have proposed the same amount of housing at West of Harwell as in the previous consultation, i.e. for 200 homes.
- 19.40 A number of comments were received regarding the site to the West of Harwell mainly reflecting the scale of development compared with existing services, however the following main issues were raised:
- the loss of village identity, coalescence and impact on village structure;
 - traffic congestion;
 - support for the site stating it is a sustainable location, is suitable and available for development;
 - Oxfordshire County Council has stated satisfactory site access can be achieved, with road improvements, but raised concerns over substantial pressure on wider highways, stating the developer would be required to provide a safe walking route to the bus stops and improve frequency and hours of service on the strategic bus route between Wantage, Harwell and Didcot;
 - Oxfordshire County Council has stated further work is required on determining school place planning and school growth potential; and
 - Thames Water does not envisage infrastructure concerns regarding water supply capability in relation to this site however it does have concerns regarding waste water and has suggested what will be required to overcome this.

Milton Heights Site

Main Issues raised through previous Consultations

- 19.41 The site was introduced through the Housing Delivery Update consultation for 1,400 dwellings which led to a total of 20 responses. Specific comments raised the following issues:

- objections from Oxfordshire County Council and others on the quantum of the proposed development and impact on transport network;
- impact on the existing settlement;
- impact on noise and air quality due to the proposed site's proximity to the A34;
- cumulative impact of development in the area; and
- dependence on the use of the private motor car to access nearby towns.

How did consultation comments inform the Local Plan?

- 19.42 Reflecting the consultation responses, the objection from OCC on highways grounds and recent housing delivery in the Vale reducing the need for homes to be identified through strategic allocations, the council deemed it appropriate that this strategic site allocation should be reduced.
- 19.43 Other specific points raised through the consultation have been addressed through the Development Site Template. This sets out how the site should be planned to ensure site specific constraints are adequately addressed.

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- 19.44 The council have reduced the amount of housing at Milton Heights to 400 homes, as explained above.
- 19.45 A number of comments were received regarding the site at Milton Heights, these focussed mainly on the scale of developments. Specific issues raised the following issues:
- The site is suitable for further expansion;
 - The site does not have any landscape, other special nationally recognised landscape designation or particular heritage features;
 - cumulative impacts of traffic from this proposed development and others like it;
 - Oxfordshire County Council previously objected, and although an allocation of 400 was deemed acceptable in principle as it will allow the primary school to expand to 1 Form of Entry the County Council is yet to be convinced that the transport impacts of 400 dwellings can be mitigated. Also developer required to contribute to the development of bus routes as currently not served by any service; and
 - Thames Water does not envisage infrastructure concerns regarding Water Supply capability in relation to this site however it does have concerns regarding waste water and has suggested what will be required to overcome this.

East of Sutton Courtenay Site

Main Issues raised through previous Consultations

19.46 The site was introduced through the Housing Delivery Update consultation for up to 220 dwellings with contributions to appropriate infrastructure.

19.47 Around 24 comments were received and specific issues were raised:

- concern over the susceptibility of the site to surface water flooding;
- comments, including from Oxfordshire County Council, raised concern over how adequate access would be achieved for the site;
- concern over the wider impact of development in Sutton Courtenay on the local highway network;
- other concerns related to the impact of development on the provision of local infrastructure;
- the proximity of the site to a landfill site was raised; and
- a concern over the cumulative impact of development

How did consultation comments inform the Local Plan?

19.48 The council is aware of the potential constraints to developing the site and has noted the comments raised. Specific actions include:

- the Development Template includes site requirements and explains the need for appropriate investigation and identification of mitigation to address the main issues raised;
- the site has been investigated in the council's Strategic Flood Risk Assessment and Sequential Test and does not have evidence to justify precluding the proposed allocation;
- a detailed investigation, undertaken in partnership with Oxfordshire County Council, identifies that the school site is sufficient to accommodate the necessary expansion; and
- the Evaluation of Transport Impacts Study identifies that whilst development in Sutton Courtenay is likely to have a negative impact, the small scale of the proposed development ensures that any impact is considered acceptable.

Publication Version of Local Plan 2031 Part 1 Main Issues

19.49 The council have proposed the same amount of housing at East of Sutton Courtenay as in the previous consultation, i.e. 220 homes.

19.50 Thames Water does not envisage infrastructure concerns regarding water supply capability in relation to this site however it does have concerns regarding waste water and has suggested what will be required to overcome this.

19.51 Oxfordshire County Council raises concerns about a satisfactory access and contributions should be secured towards future strategic infrastructure improvements for Abingdon. The developer will need to fund relocation of bus stops along with improved infrastructure and contribute to enhanced frequency. Also the Sutton Courtenay Primary School will need to expand

which will require acquisition of land. Expansion of SEN and secondary school required.

- 19.52 Five comments were received regarding the site at Sutton Courtenay with the majority outlining support for the allocation as it is deliverable and English Heritage welcomes some of the site principles. One objection raises a number of issues related to the negative impact that the traffic, drainage and character loss of the village, inadequate site access, questioned the affordability of new housing and stated the council should exhaust all brown field and redevelopment opportunities first.

Core Policy 15

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- 19.53 A number of general comments have raised issues regarding growth at Wantage and Grove. Comments include too many housing projects for the Wantage area; high housing densities are not conducive to appropriate communal living; the Plan proposes 5,500 houses in Wantage/Grove with no local transport infrastructure to support employment in Science area, which is not compliant with the NPPF; and, if it was expanded its appeal and its historical character would be compromised.
- 19.54 The Wantage and Grove Campaign Group represents the view of approximately 1,000 individuals in the Wantage and Grove area and they state developments should be proportionate and sustainable and the infrastructure should enhance and improve quality of life for its residents.
- 19.55 English Heritage welcomes the statement in the vision for the South East Vale Sub-Area that the town centre in Wantage will have been protected and enhanced, although however they would prefer terminology that is more consistent with the NPPF.

Core Policies 16 to 19

Publication Version of Local Plan 2031 Part 1 Main Issues

- 19.56 Around 9 comments were received regarding CP16 'Didcot A Power Station' with around 4 comments stating the policy should allow for a more flexible approach to development.
- 19.57 Around 29 comments were received regarding CP17 'Delivery of Strategic Highway Improvements within the South East Vale Sub Area' which focuses on three main topics; the delivery of highway infrastructure and implications of this; public transport and cycling and the increase in provision; and traffic congestion and existing issues that need resolving.
- 19.58 In regards to CP18 'Safeguarding of Land for Transport Schemes in the South East Vale Sub Area' a range of comments were received with one main issue being raised relating to the Western Wantage Link Road, with

issues around deliverability however the link would provide a much needed alternative. Other comments have suggested other road improvements.

19.59 No main issues were raised regarding CP19 'Reopening of Grove Railway Station'. Only 4 comments were received with both support and objections

20. Western Vale Sub Area Strategy Main Issues

20.1 The Western Area Sub Area Strategy includes Core Policy 20 which identifies the following sites;

- Land South of Park Road, Faringdon
- South West of Faringdon
- East of Coxwell Road, Faringdon
- South of Faringdon
- North of Shrivenham
- West of Stanford in the Vale

20.2 Comments and main issues raised for each of these sites are detailed below. Those sites that have been removed are briefly explained below. For detailed comments on all sites, please see the Consultation Statement (October 2014) that accompanied the Publication Version of the Local Plan 2031 Part 1 and the Strategic Sites Selection Topic Paper 3 which sets out the site selection process throughout Plan preparation.

Land South of Park Road, Faringdon Site

Main Issues raised through previous Consultations

20.3 This site has been proposed since the Preferred Options Consultation in 2009 and has been within the Draft Local Plan and the Housing Delivery Update Consultation. It was proposed to deliver 350 homes, 3 ha of business land, and provide for a new primary school on site.

20.4 Around 15 responses were received in response to this proposed strategic development allocation, mostly from statutory bodies. Specific comments included:

- objection from developers on the basis of insufficient evidence to justify its selection as the only strategic site in the Western Area;
- the site is unlikely to reinforce the service centre role of Faringdon as some residents will be more than a 20 minute walk from the centre;
- a call for a larger allocation of employment land; and
- a recommendation from the Environment Agency that a flood risk and drainage strategy should be developed for the site

How did consultation comments inform the Local Plan?

20.5 The site represents a sustainable location for providing additional housing in the town of Faringdon. Consultation comments relating to specific constraints have been addressed and have informed the masterplan that has been developed for the site. Since the consultation an outline planning application has been received by the council and there was a 'resolution to grant planning permission subject to legal agreement' in December 2013.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 20.6 The council has proposed the same amount of housing at Land South of Park Road as to the previous consultation, i.e. 350 homes.
- 20.7 English Heritage welcomed the principle of an archaeological investigation however would like this principle to go further and require the investigation to inform the scheme, with any significant remains being retained in situ wherever possible.
- 20.8 Oxfordshire County Council states highways improvements will be required to Park Road and new bus stops have been requested with contribution towards the bus service. They support education provision as set out in the IDP.
- 20.9 Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raises concerns over water supply and has suggested what will be required to overcome these.

South West of Faringdon Site

Main Issues raised through previous Consultations

- 20.10 The site was introduced through the Housing Delivery Update consultation for up to 200 dwellings with contributions to appropriate infrastructure.
- 20.11 Around 9 comments were received with specific comments raising the following issues:
- support for the allocation of the site;
 - Oxfordshire County Council supports education provision as set out in the IDP;
 - Thames Water stated that it has concerns regarding water supply and sewage treatment capacity; and
 - development of the site would encroach on the green buffer zone outlined in Great Coxwell Plan and join Faringdon and Great Coxwell.

How did consultation comments inform the Local Plan?

- 20.12 The issues regarding sewage treatment capacity and water supply capability are being explored and resolved through the planning applications that have been submitted for land around the town, including for this site. The Infrastructure Delivery Plan includes measures to address these issues. The specific wording requested has been included in the site templates. The more detailed issues regarding the development of the site will be incorporated into the masterplan for the site.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 20.13 The council have proposed the same amount of housing at South-West of Faringdon as in the previous consultation, i.e. 200 homes.
- 20.14 In regards to South West Faringdon, concerns were raised over site capacity due to landscape constraints and comments over specific requirements in the site template.
- 20.15 Oxfordshire County Council would expect contributions towards upgrading the A420 junction at Coxwell Road (been secured through other funding) and wider improvements to the A420 corridor and satisfactory access can be provided. Also fund relocation of bus stops and contribute to route 66 strategy for improved bus route.
- 20.16 Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raises concerns over water supply and has suggested what will be required to overcome these.

East of Coxwell Road (Great Coxwell Parish) Site

Publication Version of Local Plan 2031 Part 1 Main Issues

- 20.17 This site has been included in the Publication Version for 200 homes as a planning application has been submitted for this site, and it is considered prudent to allocate the site in the Plan until permission is granted.
- 20.18 The following issues were raised;
- concern of coalescence of Faringdon and Great Coxwell;
 - negative impact on the character of the village;
 - this site is not listed as being in the Parish of Great Coxwell;
 - Oxfordshire County Council request new bus stops and improvements to bus service. They support education provision as set out in the IDP;
 - comments on the specific requirements in the site template; and
 - Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raises concerns over water supply and has suggested what will be required to overcome these.

South of Faringdon (Great Coxwell Parish) Site

Main Issues raised through previous Consultations

- 20.19 The site was introduced through the Housing Delivery Update consultation for up 200 dwellings with contributions to appropriate infrastructure.
- 20.20 Around 6 comments were received with specific comments raising the following issues:
- Thames Water stated that it had concerns regarding water supply and sewage treatment capacity in relation to this site; and

- development of the site would encroach on the green buffer zone outlined in Great Coxwell Plan and joins Faringdon and Great Coxwell.

How did consultation comments inform the Local Plan?

20.21 The issues regarding sewage treatment capacity and water supply capability are being explored and resolved through the planning applications that have been submitted for land around the town, including for this site. The Infrastructure Delivery Plan includes measures to address these issues. The specific wording requested has been included in the site templates.

Publication Version of Local Plan 2031 Part 1 Main Issues

20.22 The council has proposed the same amount of housing at South of Faringdon as in previous consultation, i.e. 200 homes.

20.23 In regards to South of Faringdon, a few supports were received; however the following main issues were raised;

- concern of coalescence of Faringdon and Great Coxwell;
- negative impact on the character of the village;
- Oxfordshire County Council states a major upgrade of A420/Great Coxwell Road junction will be delivered and new bus stops required and financial contributions to bus service. Support education provision as set out in the IDP; and
- Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raises concerns over water supply and has suggested what will be required to overcome these.

North Shrivenham Site

Main Issues raised through previous Consultations

20.24 The site was introduced through the Housing Delivery Update consultation for up 400 dwellings with contributions to appropriate infrastructure.

20.25 Around 40 comments were received relating to this site. There were general concerns raised about the number of houses to be allocated to Shrivenham, particularly compared to other villages in the district. There was a feeling that the facilities in the village couldn't cope and that it would become a dormitory settlement to Swindon. Specific comments raised the following issues:

- Thames Water stated that they had concerns regarding water supply and sewage treatment capacity in relation to this site;
- it is not logical to develop Shrivenham to the north and the south;
- the density of proposed housing will prevent design appropriate to a village situation and conflict with the look of existing housing;

- dwellings should blend in with their surroundings;
- the impact on views from the Ridgeway will be a problem; and
- enlarge allocation to 32.6 ha by taking the northern boundary up to the A420. This would ensure the cricket pitch is retained, provide additional public open space and deliver development parcels at lower densities.

How did consultation comments inform the Local Plan?

20.26 In response to the high level of concern raised by the residents of Shrivenham, and their preference for development to be focused to the north of the village, the overall housing figure for Shrivenham has been reduced and only one site is proposed for allocation in the north of the village. The site boundary has been expanded to include the whole land parcel up to the A420 to accommodate around 500 homes. A planning application for the first phase of the site (the area shown in the February 2014 consultation) has been submitted for 200 homes and includes land for a primary school. The Infrastructure Delivery Plan includes measures to address issues relating to waste water treatment and water supply capacity. The specific wording requested has been included in the site templates. More detailed issues regarding density and design will be dealt with at planning application stage.

Publication Version of Local Plan 2031 Part 1 Main Issues

20.27 As stated above, the site to the South of Shrivenham has been removed with capacity at the site North of Shrivenham being increase to 500 homes.

20.28 A number of comments were received relating to the following:

- Shrivenham is too small for the additional houses;
- lack of employment provision and opportunities to reflect increase in housing;
- lack of capacity with existing infrastructure to handle growth in particular the A420;
- lack of consideration of Shrivenham as a village and its rural character;
- concerns regarding the impact on wildlife, disturbance of noise and light from leisure facilities;
- concerns regarding potential significant risk of hydrological and recreational impacts too the Tuckmill Meadows SSSI from development in this location; and
- the level of growth at Swindon and the impact this will have specifically on Shrivenham and the A420 and a lack of recognition of this in the Local Plan.

20.29 Oxfordshire County Council consider that: contributions towards the wider improvements along the A420 corridor will be required, satisfactory access can be provided; new bus stops and connecting footpaths will be required including contributions to the route 66 strategy for an improved bus service. In regards to education, the local primary school is required to

expand to 1.5FE and acquisition of land required and options are being explored. Expansion of Faringdon Community College is also required but is already planned.

- 20.30 Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raises concerns over water supply and has suggested what will be required to overcome these.

West of Stanford in the Vale Site

Main Issues raised through previous Consultations

- 20.31 The site was introduced through the Housing Delivery Update consultation for up to 290 dwellings with contributions to appropriate infrastructure.
- 20.32 Around 21 comments were received relating to this site. There was general concern raised regarding the number of dwellings and the impact this would have on local infrastructure. Specific comments included:
- the Planning Inspector for an appeal on the adjacent site stated that it did not set a precedent for development on the western side
 - Thames Water stated that they had concerns regarding water supply and sewage treatment capacity in relation to this site. They requested specific wording relating to this to be included in the plan;
 - allocation should be reduced to 204 dwellings to permit the development of certain amenities;
 - “identikit” housing estate with no regard to local vernacular;
 - the strategic site is one of the “least worst” places for development around Stanford in the Vale;
 - Some of the housing should be accommodated on the recreation/football ground opposite;
 - the Parish Council request that the number be reduced to 200 dwellings, that the site boundary be reduced accordingly and that the remaining 90 dwellings be accommodated within other sites in the village identified through the Neighbourhood Plan; and
 - the landscape capacity study advises that the density is lower than that required for 290 dwellings.

How did consultation comments inform the Local Plan?

- 20.33 The council recognises that a Neighbourhood Development Plan is being prepared by the community, who wish to allocate additional land for development elsewhere in the village. On this basis, it is no longer considered necessary to propose strategic scale development for 290 dwellings, but to reduce the scale of development to 200 dwellings.
- 20.34 The Infrastructure Delivery Plan includes measures to address these issues relating to waste water treatment and water supply capacity. The specific wording requested has been included in the site templates. More

detailed issues regarding density and design will be dealt with at planning application stage.

Publication Version of Local Plan 2031 Part 1 Main Issues

20.35 As stated above, the capacity at this site has been reduced to 200 homes.

20.36 A number of comments were received regarding the West of Stanford in the Vale site, the main issues raised, relate to the following:

- inadequate local bus service;
- close to capacity at Stanford in the Vale Primary School;
- new Mains Sewer required; improvements to the Treatment Works;
- no flood mitigation in particular the provision of SUDS;
- healthcare has not been fully considered;
- more traffic calming measures;
- access points considered unsuitable;
- so many additional houses will alter the nature and character of the village;
- questions raised around the capacity of the site in particular why the capacity has been reduced as the site can accommodate more than 200 dwellings;
- Oxfordshire County Council state satisfactory access can be provided, contributions would be expected towards wider A420 corridor and additional bus stops will be required including cost for enhancing and maintaining the Faringdon-Wantage bus route. In regards to education provision, concerns are raised over the capacity of the local primary school to expand and options are being explored; and
- Thames Water has highlighted that sewage treatment capacity in this area is unlikely to be able to support this development and raised significant concerns over water supply and has suggested what will be required to overcome these.

Removed Sites

20.37 South Shrivenham and Land North West of East Challow were identified within the Housing Delivery Update Consultation as potential sites. Subsequent to that consultation, the consultation responses have been considered, further evidence base studies have been undertaken, and the need for homes to be identified through strategic allocations has been reduced due to an increase from other housing sources. These have all led to these sites being removed.

20.38 For the site South of Shrivenham, the high level of concern raised by the residents of Shrivenham and their preference for development to be focused to the north of the village has resulted in the overall housing figure for Shrivenham being reduced and only the site to the north of the village being proposed for allocation.

- 20.39 For the site North West of East Challow, the council is aware of site specific constraints, for example a buffer to protect Great Crested Newts, the proximity to historic assets and the potential of development to harm the landscape setting.
- 20.40 A few comments for both sites were received requesting to reinstate the sites. The South of Shrivenham Site should be reinstated and the dwelling requirement amended at both sites in Shrivenham to reflect the previous iteration of the Plan. The Land North West of Challow Site should be reinstated as it has been demonstrated 200 dwellings can be accommodated on the site.
- 20.41 The above sites are still considered sustainable sites, suitable for development however due to the concerns raised above they are not considered appropriate for Local Plan 2031 Part 1 but may be considered for allocation within Local Plan 2031 Part 2

General Comments on Core Policy 20

Publication Version of Local Plan 2031 Part 1 Main Issues

- 20.42 In regards to Core Policy 20, a number of comments have raised concerns regarding the impact of development on the A420 which is a major road, is already congested and has capacity problems. It is suggested that the Local Plan 2031 Part 1 does not make sufficient reference to the level of growth at Swindon or specific improvements to the A420 and the impact this will have on the Vale.
- 20.43 A few general comments regarding growth at Faringdon highlighted concerns that employment growth is not balanced with the amount of housing growth, and that generally there is too much housing at Faringdon compared with existing dwellings.
- 20.44 Oxfordshire County Council and Stagecoach consider bus service 66 to be providing a major inter-urban strategic public transport link and there is a need to deal with local public transport services between the two authorities strategically (with Swindon). Oxfordshire County Council have raised concerns over the local bus service and the need for improvements, junction improvements and local mitigation will be required and the need for development to contribute towards education provision.

Core Policy 21

- 20.45 Some comments were received regarding CP21 'Safeguarding of Land for Strategic Highways Improvements within the Western Vale Sub Area' mainly relating to concerns of capacity along the A420, that inadequate improvements are proposed, clarity is required in the policy as to what improvements will be necessary; and, how development will need to provide/contribute to improvements. Swindon Borough Council supports the safeguarding of land for junction improvements and would like to

continue joint working and Oxfordshire County Council state that development adjacent to this route can be accommodated by improving the frequency of the Route 66 core bus route and by providing improved junction arrangements, to avoid delays.

Alternative Sites

Main Issues raised through previous Consultations

- 20.46 A total of 81 alternative site options were put forward for housing development in the Vale through the Housing Delivery Update Consultation. Details of the sites put forwards for consideration are set out in the Sites Selection Topic Paper. See the Strategic Sites Selection Topic Paper and previous Consultations Statements for details on these sites.

Publication Version of Local Plan 2031 Part 1 Main Issues

- 20.47 See the relevant section above in regards to comments and main issues raised relating to sites that have been removed through the Publication Version of the Local Plan.

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Please contact Planning on 01235 540347

Planning Policy Team

Abbey House, Abbey Close,
Abingdon, OX14 3JE

Tel: 01235 540499 Fax: 01235 540397

Email: planning.policy@whitehorsedc.gov.uk

www.whitehorsedc.gov.uk