

Planning Services
Vale of White Horse District Council
Benson Lane
Crowmarsh Gifford
Wallingford
OX10 8ED

Sent by email to: planning.policy@whitehorsedc.gov.uk

Re: Vale of the White Horse District Council Local Plan 2031

Dear Planning Policy Officers,

The Vale of the White Horse District Council Local Plan 2031 was considered by the Council at a meeting held on 1<sup>st</sup> December 2014.

The Council objects to the proposed large scale residential developments near Didcot detailed below.

1. Development to the West of the A34 near Didcot would provide for:

	Homes
Milton Heights	400
West of Harwell Village	200
North of Harwell Campus	550
East of Harwell Campus	850

West TOTAL 2000

### 2. East of the A34 near Didcot:

	Homes
"Valley Park"	2550
North West "Valley Park"	800
And East of Sutton Courtenay	220

East TOTAL 3570

TOTAL 5570

These proposed housing numbers near Didcot in addition to SODC's Core Strategy 9,000 homes at Didcot total about 15,000.

The proposals are piecemeal and produce a "bolted on" system rather than a co-ordinated and organic plan for Didcot's development.



## 1. Market Saturation and its Impact on Delivery

SODC's Core Policy currently provides for about 9,000 additional homes in Didcot. This number has been slow to be built out, one site has still not been developed after 30 years.

The current build rate is about 200 homes per year which appears to meet housing demand at Didcot.

Didcot does not have a 5 year deliverable land supply.

It appears unlikely that increasing planned numbers near Didcot would increase housing supply by 2031. This conflicts with NPPF 47 on deliverable sites and paragraph 154 that requires plans to be aspirational but realistic.

Core Policy 47: Delivery and Contingency has failure inbuilt.

#### 2. Poor Infrastructure Plans

The infrastructure plans do not meet NPPF paragraph 156 and cannot be provided in the timeline. Large scale funding, as yet mostly unidentified, would be needed for:

Strategic Highways

The local network across the town for public transport, vehicles, cycles and pedestrians has not been prioritised because of the emphasis on travel between Didcot and employment centres at Milton Park and Harwell campus. Residents also use the town for many purposes.

The sewerage network is currently inadequate. Systems have been shown to be inadequate in the medium to long term. Sewage treatment improvements are identified and will take some years to create so no additional housing should be connected to the existing sewage system until these improvements have been completed.

Water provision – the 5 year capital investment plan of Thames Water will not easily meet the Plan's timeline.

Electricity network improvements are identified.

Educational needs e.g. extending the GWP Secondary School before it is built reduces the green space available for the currently planned school. Education is an essential need that is not properly planned for West of Didcot.

Health needs – no response from the responsible health bodies and evidence of poor access to existing health centres and reduced convalescent bed numbers at Didcot Hospital. No minor injuries unit locally. No after hours provision locally. Emergency Services – no response. Travel congestion on major roads, especially on the A34 is leading to concerns over access to Oxford hospitals, especially A&E.

Additionally, the proposed use of shared surfaces as described in the draft Design Guide, Principle DG35: Shared surface streets, of the draft Design Guide is flawed as experience at GWP shows that this does not work even on secondary and tertiary roads and it is causing conflict between residents and traffic.

#### 3. Increased Densities

The Core Policy 23 stipulates a net minimum of 30 dwellings per hectare but is vague about maximum densities and where they might apply.

The early draft of the Local Plan included increased densities at "Valley Park" and "North-West Valley Park". These areas are up to 2 miles from Didcot, not in a town centre. Higher density would be inappropriate.

Parts of the "Valley Parks" need to be restricted for residential development because of noise from road and rail as well as flooding.

It is not clear if the outline densities and dwelling numbers are realistic. This is less likely to achieve high quality design with cramped layout, reduced educational and other facilities and less green spaces.

### 4. Coalescence

These proposals will cause coalescence between Didcot and Harwell Village, and Milton Heights and Didcot. The Proposed safeguarding of land off the Harwell Link Road for the Southern Didcot Perimeter Road (Appendix E) would lead to coalescence between Didcot and both East and West Hagbourne.

This future coalescence leads to a loss of social identity which would follow a rapid urban extension to an urban extension to Didcot Town. The Valley Parks are neither Harwell, nor Didcot, but isolated and lacking focus.

#### 5. Green Infrastructure

Core Policy 45: Green Infrastructure lacks evidence, rigour and urgency. SODC's Chris Blandford Report (2008) proposes a "green necklace" circumscribing Didcot, including Great Western Park. This work has not been carried out and the study has not been updated.

The Valley Parks proposals build over open countryside, existentially limiting access to accessible natural greenspace (para 6.116 of Vale Plan 2031). They do not provide for Natural England's ANGst model, which is nationally recognised and the work has not informed these proposed strategic sites.

# 6. Promoting Public Transport, Cycling and Walking

Core Policy 35: Promoting Public Transport, Cycling and Walking is not realistic. The "Valley Parks" are up to 2 miles from the Town Centre and Didcot Parkway Station. The Parking Provision on Great Western Park is inadequate and leading to Parking Wars. Designs that delete front gardens, narrow roads and artificially design out car use are simply not working. Core Policy 35 and therefore density proposals, need reviewing.

#### 7. Hotel Provision

Core Policy 31 provides hotels for Milton Park and Harwell Campus as well as on main transport corridors. This would be damaging to the prospects of Didcot acquiring even one town centre hotel accessible to non-car users. This shows a failure of District co-ordination of policies and needs reviewing.

## 8. Affordable Housing

Core Policy 24: Affordable Housing and para 6.10 and 6.13 appears to focus on using strategic sites, such as Didcot. The long-promised "Science Vale Area Action Plan" has not been published or consulted on. We are concerned that there should be a balance in tenure and size of dwellings that ensures community cohesion. This does not meet NPPF 50.

### In Conclusion:

Didcot Town Council objects to the Vale's Local Plan for the above reasons. The Vale is seeking to solve its needs for strategic sites by a poor and cynical strategy that ignores deliverability. These dwellings cannot be built out by 2031 under this plan.

In addition, the Council calls on the Vale to work with SODC to produce a joint plan for Didcot that recognises that residents from one district use services in the other.

Yours Sincerely,

Karen Dodd Deputy Town Clerk 5<sup>th</sup> December 2014