

 <p>Vale of White Horse District Council</p>	<h2>Vale of White Horse Local Plan 2031 Part 2: Preferred Options</h2> <h3>Comment Form</h3>	Ref: (For official use only)
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Please return to the Planning Policy Team, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton OX14 4SB, or email planning.policy@whitehorsedc.gov.uk no later than 5pm on Thursday 4 May 2017.

This form has two parts –

- Part A – Your Personal Details
- Part B – Your Comments

Local Plan 2031 Part 2 Comment Form

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. The aim of Part 2 is to set out:

- policies and locations for the Vale's proportion of Oxford's housing need up to 2031
- policies for the part of Didcot Garden Town that lies within the Vale of White Horse district
- detailed development management policies to complement Part 1 and replace the saved policies of the Local Plan 2011
- additional site allocations for housing.

This consultation is running for 8 weeks from **Thursday 9 March 2017 to 5pm on Thursday 4 May 2017**. All comments will be taken into consideration if submitted within the consultation time frame.

Submitting Comments

Please fill in this form and return by:

- email to: planning.policy@whitehorsedc.gov.uk

OR

- post to: Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Comments must be received by **5pm on Thursday 4 May 2017 precisely**.

Please complete a separate form (Parts A & B) for each Local Plan 2031 Part 2 Planning Policy, supporting text and/or Strategic Site you are commenting on.

Please clearly identify which Planning Policy your comments refer to using the reference (i.e. DP1 and/or Page or Chapter number) in the Local Plan 2031 Part 2.

Please do not repeat your previous comments. The council will review any comments you have previously submitted.

Part A: Your Details

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs. L."/>	<input type="text"/>
Last Name	<input type="text" value="Martin"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Clerk"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Marcham Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="90 Howard Cornish Road"/>	<input type="text"/>
Line 2	<input type="text" value="Marcham"/>	<input type="text"/>
Line 3	<input type="text" value="Abingdon"/>	<input type="text"/>
Line 4	<input type="text" value="Oxon"/>	<input type="text"/>
Post Code	<input type="text" value="OX13 6PU"/>	<input type="text"/>
Telephone Number	<input type="text" value="01865 391833"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="Clerk@marchamparishcouncil.gov.uk"/>	<input type="text"/>

If you do not wish to be informed of future updates to the Local Plan or other planning policy consultations in your area, please tick this box

PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.

Part B – Please use a separate sheet for each representation

Name or Organisation :

Marcham Parish Council

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. We would like to hear your opinions on:

- the policies contained within this Plan
- the additional site allocations
- any recommendations you may have for alternative sites
- any improvements to the Local Plan Part 2 supporting text or policies that you believe will help to improve/strengthen the Local Plan.

If you are commenting on more than one policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

8A

HELAA REFERENCE: MRCM_B

South Marcham

4. Please make your comments on this Planning Policy or Site in the box below:

Marcham Parish Council is objecting to the proposal to include the two sites in the Local Plan Part 2:

**South site for 120 houses (referred to as South Marcham)
HELAA Reference: MRCM_B**

**North East site for 400 houses (referred to as North-East Marcham)
HELAA Reference: MRCM_A**

Please see attached sheets below regarding MRCM_B. A separate submission will be made for the North East Marcham site.

(continue on a separate sheet/expand box if necessary)

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

RESPONSE TO LOCAL PLAN 2031 PUBLISHED MARCH 2017
FROM MARCHAM PARISH COUNCIL
South site for 400 houses (referred to as South Marcham)
HELAA Reference: MRCM_B

Background History

What has happened

Over the last few years 260 houses have been built or authorised to be built within Marcham.

During this period, no infrastructure or facilities have yet been provided. The school is due to be extended (at the cost of lost recreation facilities and community tennis courts) and a community hall is to be provided (at the cost of some open recreational space).

The effect on the village has been:

1. Loss of facilities (or space)
2. Increased pollution in the village – particularly in the Air Quality Management Area (AQMA) in Packhorse Lane on the A415
3. Damage to village infrastructure (particularly roads) but including trees and other ‘green’ matters
4. Increased pressure on sewerage (and similar) facilities in which no significant investment has yet been made.

There has been no investment in village employment opportunities (even fast broadband is not yet available to encourage businesses from home).

Assessment against NPPF

Assessing these recent developments against the three dimensions to sustainability outlined in the NPPF:

1. In the economic role:
 - a. The planning process has only delivered housing.
 - b. There has been nothing to contribute to growth (for example by providing local employment opportunities or support for business).
 - c. There has been no provision of infrastructure to support the new housing.
2. In the social role (supporting strong, vibrant and healthy communities):
 - a. The supply of housing required to meet the needs of present and future generations has not been delivered. Marcham has asked for types of housing suitable for its residents (eg bungalows; downsizing opportunities) – none of been delivered.
 - b. In terms of accessible local services that reflect the community’s needs to support its health, social and cultural well-being – nothing has been delivered.
 - c. Individual developments have been built without an overall plan so that sites are not properly integrated (eg multiple access onto A415; inter-site pathing) reducing social cohesion (the Parish Council is working on getting some of these issues resolved)
3. In the environmental role (contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy), the only deliveries have been:
 - a. Reduction in Air Quality (particularly in the AQMA) as verified by the Air Quality Monitoring Officer
 - b. Building over open fields which have historic artefacts
 - c. Increasing pollution by providing housing well away from any potential employment
 - d. Damage to existing infrastructure (particularly roads) by the increased traffic from the new houses

The NPPF states that “*Sustainable* means ensuring that better lives for ourselves don’t mean worse lives for future generations”. These recent developments are such that in none of the three dimensions to sustainability outlined in the NPPF has sustainability actually been achieved.

It is against this background of failure to deliver in the past that Marcham Parish Council has reviewed the proposed developments.

For the sake of brevity, the Parish Council has not commented on drawbacks set out in the specific requirements (of Local Plan 2031 Part 2 Appendices) except where the drawbacks have been significantly understated.

Details of the Proposals

Housing Proposed

The site in South Marcham is:

1. Located on greenfield site immediately adjacent to flood plain (see the detailed map in the Local Plan 2031 Part 2 Appendices)
2. Vehicle access only on to the A415 East of village (making a third access from new estates onto the A415) and then along A415 East or West
3. Accessible for pedestrian via the same route as vehicles onto A415 or through estates already built or being built
4. Nearly 700m from centre of development to village (shop, pub and church) and about 400m to community facilities.

Infrastructure Proposed

Should these proposals go ahead, new infrastructure will be required. The proposal contains no commitment to infrastructure. In “Vale of White Horse District Council Local Plan 2031 Part 2 Appendices” there are comments about “assessing”, “contributing”, “considering” – but no commitment to actual delivery.

Assessment against Core Policy 1

In the analysis below, the proposed site has been assessed against Core Policy 1: Presumption in Favour of Sustainable Development.

If the proposed site is not sustainable, it does not conform to Core Policy 1. As the Plan Part 2 does not define what is meant by sustainability, assessment has been made against the definitions used in the NPPF (and the associated guidance in the NPPG).

AQMA

No action is proposed on the Air Quality Management Area (AQMA) on Packhorse Lane on the A415. (Typically, actions would include those proposed in the Draft NICE guidelines of December 2016). Unless firm action is taken, any housing development in Marcham, or nearby, will increase traffic (and hence pollution) in the AQMA.

Additional housing without AQMA action conflicts with the health aspect of the social role of the NPPF.

We note that in London there are formal challenges currently under way regarding actions on Air Quality. Should equivalent challenges be successfully made with regard to the Marcham AQMA, then development at this South Marcham site could be stopped – preventing the full quota of houses required in the Local Plan 2 being built.

Greenhouse Gas Emissions

We also note the comment in the Site Table of the Housing Delivery update from February 2014. This comment notes that “Likely significant negative effects against SA objective 10 (reduce greenhouse gas emissions)”.

By-Pass

The line of the by-pass is being protected, but there is no commitment to build the by-pass. This means that there will be additional traffic on the A415, and other roads. The additional traffic will increase the already high levels of congestion and thereby prevent the full economic benefits of any new housing being delivered. This By-pass will also be required should any other proposed developments cause more traffic to use the A415.

This is in direct conflict with the economic role within the NPPF.

Other Major Roads

There is no commitment to any action on the A34 or other roads (or the Frilford lights). As with the lack of by-pass, additional traffic will increase the already high levels of congestion and thereby prevent the full economic benefits of any new housing being delivered.

We also note the comment in the Site Table of the Housing Delivery update from February 2014 with regard to South Marcham. This comment notes that “There are capacity issues on the wider transport network and development may lead to worsening conditions. However, the site is well connected to public transport with opportunities for increased usage”.

The facts that caused this comment to be made have not changed.

The statement on public transport is misleading in that the major available public transport is an hourly bus service to the centre of Oxford, Abingdon and Wantage, and that no direct service is available to:

1. The other major centres of employment at Harwell, Milton Park or around the Oxford Ring Road
2. The major education areas in Oxford (Oxford Brooks campuses and others)
3. The key health destination of the hospital complex in East Oxford

(There is an intermittent service to Witney also available).

This is in direct conflict with the economic role within the NPPF of providing the right infrastructure.

Flooding

The site drains into a flood area (see various maps – including that used in the presentation shown to councillors on 6th March 2017 and the more detailed map in the Local Plan 2031 Part 2 Appendices).

Any action that adversely affects water drainage will impact on the risk of flooding in Marcham (and could affect Abingdon downstream). In 2007 flooding in Marcham closed the A415. This flooding risk is real – not theoretical.

The overall plan must ensure that flooding is treated in an integrated manner and not done on a ‘single development’ basis. A full commitment should be made to prepare plans to ameliorate flood risk. These plans should be subject to the tests outlined in the NPPG. In view of the location of Marcham, the tests should be expected to cover areas ‘upstream’ and ‘downstream’ of Marcham as well as the particular sites where development is proposed.

Without such a commitment in the Plan Part 2, the plan does not conform to the requirements of the environmental role in sustainability. (see also Vale Policy regarding Flood Risk and the Strategic Flood Risk Assessment of March 2017).

Sewerage

Marcham already has problems with sewage/run-off disposal (see conditions applied to 'already approved' developments).

The current approach to building sewerage disposal facilities is on a 'per-development' basis. This could mean that at some stage in the development process a single developer could be faced with a very major upgrade of sewerage storage and pumping facilities and that the cost of this upgrade could effectively stop further housing development. The overall plan must ensure that sewage/run-off disposal capacity is available before it is required.

If no commitment is made to such planning and to delivery of the necessary facilities, the Plan Part 2 does not conform to the requirements of the environmental role in sustainability. Furthermore, without this commitment, the Vale can have no confidence that the houses will be built and the requirements for housing in Plan Part 2 met.

(The Strategic Flood Risk Assessment of March 2017 states that "Thames Water should be consulted at an early stage to ensure that there will be sufficient capacity in the wastewater system and any upgrades are carried out where necessary." In most of Marcham, the wastewater system carries away sewage as well.)

School

A specific concern is the position on the village primary school since lack of space prevents extension of the existing primary school.

Either

1. a second Marcham School will have to be built within Marcham. or,
2. children from parts of Marcham will have to be 'bussed' to other schools outside the village.

Either action will help ensure that new developments remain 'detached' rather than integrated with village. This approach conflicts with the social role within the NPPF.

It is noted that in the Sustainability Appraisal (para 10.3.3), the 2 sites in Marcham are examined together and with committed sites with regard to the school. The need to pool all these sites increases the risk that the school will not be constructed.

Health facilities

No health facilities (such as doctor's surgery) exist in Marcham and none are planned within the Local Plan 2.

Major facilities for Marcham residents are outside Marcham (as would be expected for a village of this size). The main source of health facilities is on the East side of Oxford (around the John Radcliffe Hospital). The travel plans appear to make no arrangements to get Marcham residents to those facilities. This omission will have a significant impact on people in Marcham.

This poor provision of health facilities conflicts with the social role within the NPPF.

Integration with existing village

The poor access to existing local services (eg shop, pub and church) conflicts with the social role within the NPPF.

Risk from Partial Construction

The Parish Council has a major concern regarding the delivery of infrastructure if only some of the housing is built. If the cost of infrastructure (eg the primary school) can only be provided by a levy on all of the houses, and only some of the houses are built, then the infrastructure will not be provided as funds will not be adequate. This represents a major risk to infrastructure provision.

Similar arguments would apply:

1. During the build process if the funds only became available towards the end of the build period
2. If there was major cost inflation during the build period which meant that inadequate funds were provided from early-built housing

Should the risk of partial construction become an actuality, then sustainability would not be achieved.

(NPPF states that “*Sustainable* means ensuring that better lives for ourselves don’t mean worse lives for future generations.”)

Overall Conclusion of Assessment against Core Policy 1

As the plan stands, there is sufficient conflict with regards to sustainability which means that this site does not comply with Core Policy 1.

Assessment against Core Policy 34 etc regarding the A34

This Core Policy only covers working with other groups, not actually providing the Facilities. The Plan Part 2 contains no commitment to:

1. upgrading the A34
2. providing an East-West Trunk road
3. providing ‘small’ upgrades to other roads around Marcham (such as at the Frilford lights; or the Abingdon Road leading to the A338)

With the location of employment centres set out in Plan Part 2, and the poor public transport (noted in the comments on Core Policy 1), inevitably the majority of work will be reached from Marcham by private vehicle. Without upgrades there will be a significant increase in congestion which will impact economic growth, health issues (see AQMA above) and the environment (eg cutting carbon emissions).

Plan Part 2 cannot work without a commitment to upgrade these major roads in time for the increased traffic. Effectively Core Policy 34 does not go far enough to meet the requirements set out in the NPPF, though we recognise that much of the work is outside the Vale’s remit.

Assessment against Core Policy 26: Accommodating Current and Future Needs of the Ageing Population

When members of the Parish Council met with the Vale’s team, the matter of affordable housing and caring for an ageing population was raised. The people in Marcham want housing suitable for ‘downsizing’, preferably into bungalows. Providing such facilities would, of course, release other types of housing.

The discussion with the Vale team and (as far as we can determine the Local Plan 2) makes no provision for ensuring such facilities are provided. The Plan Part 2 does not, therefore, comply with the Vale policy of Housing for an ageing population.

5. Please set out what change(s) you consider necessary.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The best action for this site is to remove it from the Local Plan Part 2 as it does not comply with a number of the Vale's core policies.

Should removal not be possible, the Vale should amend Plan Part 2 so that:

1. there is a commitment to prepare a complete plan for the site into which all developments will have to fit and a commitment (preferably legally enforceable) to deliver to this plan
2. a commitment to deliver the infrastructure required to allow the site to comply with the NPPF – including a commitment (preferably legally enforceable) which ensures that the infrastructure is in place before housing is occupied.

(see earlier comments for reasons why)

(continue on a separate sheet/expand box if necessary)

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

See comments above.

We note with concern that the Sustainability Appraisal does not discuss the comments in the draft Green Infrastructure Strategy (part 3) which notes that: "Marcham is partially served by accessible natural greenspace sites between 2ha and 20ha, although these lie mostly to the west and south, resulting in a deficit in the eastern and northern parts of the village. Marcham lacks sites from 20-100ha and over 100ha within 2km and 5km respectively." This site is attached to the areas of existing deficit without any plans to remedy the admitted deficit.

(continue on a separate sheet/expand box if necessary)

PLEASE RETURN THIS FORM BY 5PM ON THURSDAY 4 MAY 2017

Please note your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change.

PLEASE NOTE THAT BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.