



**Radley Neighbourhood Plan**

**Second Consultation Draft September 2017**

**Response by Arnold White Estates Ltd**

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## 1.0 INTRODUCTION

- 1.1 This Report, which has been prepared by Gardner Planning Ltd (**GPL**) on behalf of Arnold White Estates Ltd (**AWEL**), is the response to the Radley Neighbourhood Plan Second Consultation Draft September 2017 (**Draft 2 NP**). Responses must be made by 18.10.17. The response to the First Consultation Draft (**D1 Report**) was submitted on 30.1.17. This second Report will only comment on proposed changes to the Draft and will not repeat the substance of comments already submitted. It therefore requires that when material is forwarded to The Vale of White Horse District Council (**VWHDC**) and the Neighbourhood Plan Inspector, both Reports are submitted.
- 1.2 AWEL is promoting a development known as Radley South on behalf of the site owners. GPL participated in the Vale of White Horse Local Plan (**VWHLP**) Examination Part 1. Part 2 of the VWHLP reached the 'preferred options' in March 2017 and a 'Publication' version was published on 11.10.17 for comment by 22.11.17. AWEL will be submitting representations including support for the Radley South site.

## 2.0 POLICY AND GUIDANCE

### National

- 2.1 Reference was made to the National Planning Policy Framework (**NPPF**) in the D1 Report.
- 2.2 The Department for Communities and Local Government (**DCLG**) published '*Fixing our broken housing market*' (the Housing White Paper **HWP**) in February 2017, followed by '*Planning for the right homes in the right places: consultation proposals*' (September 2017) (**CP**).

- 2.3 These documents represent the Government's policy emphasis to significantly increase housing supply. The Prime Minister's Foreword in the HWP included (emphasis in bold):

*I want to fix this broken market so that housing is more affordable and people have the security they need to plan for the future.*

*The starting point is to build more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down.*

*We need to build many more houses, of the type people want to live in, in the places they want to live. **To do so requires a comprehensive approach that tackles failure at every point in the system.***

- 2.4 'Every point in the system' includes Neighbourhood Plans.
- 2.5 The CP focuses on a simplified methodology for calculating housing need and signals that the NPPF will be revised in early 2018.
- 2.6 Further Government announcements about increasing housing supply have been trailed for the Autumn Budget on 22.11.17.
- 2.7 The **Oxford-Milton Keynes-Cambridge Growth Corridor** was announced in March 2017 which seeks significant new housing (at levels well above those currently being planned) to support the economic potential of this vibrant sub-region. Radley cannot ignore that it is part of this growth corridor.

#### **Local: The Development Plan**

- 2.8 Many of the policies of the Vale of White Horse District Council (VWHDC) Local Plan 2011 (adopted 2006) are now superseded by the Adopted Local Plan 2031 Part 1 (**LP Part 1**). The remaining policies of the 2011 Plan will be superseded on adoption of the Part 2, 2031 Local Plan (**LP Part 2**).

- 2.9 VWHDC is preparing a Local Plan in two Parts. Part 1: Strategic Sites and Policies was adopted on 14.12.16. Part 2 will identify additional sites for development is planned to be 'submitted' in February 2018 and adopted by December 2018 <sup>1</sup>.
- 2.10 The publication of the Draft NP in December 2016 overlapped with the LP Part 2 Preferred Approach (**LP2PA**) in February 2017. The publication of the Draft 2 NP overlaps with the Publication Pt 2 LP. There is no up-to-date published program for future stages of the NP.

### Housing numbers and distribution

- 2.11 The LP Part 1 Core Policy 4 makes provision for the District of 20,560 homes over the 20-year period to March 2031. The Policy divides the District into three Sub-Areas, and Radley is within the Abingdon-on-Thames and Oxford Fringe Sub-Area, which has allocated sites totalling 1,790 homes, including 240 for the site 'North-West Radley' (others may be in Radley Parish but are extensions of Abingdon and Kennington).
- 2.12 Core Policy 8 also deals with housing in the Abingdon-on-Thames and Oxford Fringe Sub-Area. In addition to the 1,790 homes on strategic sites a further **"962 dwellings remain to be identified and will be allocated through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management process"**(emphasis added).
- 2.13 In addition to these allocations (which are all to satisfy the District housing needs), there is a commitment to contribute to Oxford's unmet housing needs in Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire, as follows (emphasis added):

*The Council will continue to work under the 'duty-to-cooperate' with all other Oxfordshire local authorities on an ongoing basis to address the objectively assessed need for housing across the Oxfordshire housing market area.*

*As a first step, Vale of White Horse District Council has sought to accommodate the housing need for Vale of White Horse District in full in the Vale of White Horse Local Plan 2031 Part 1. The Council recognises that Oxford City is unlikely to be able to*

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<sup>1</sup> VWH LDS Sept 16

*accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary.*

*To ensure Oxford's unmet need is addressed, the Council **will allocate sites to contribute towards Oxford's unmet housing need within the Local Plan 2031: Part 2**, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1. This will ensure that unmet need is considered and planned for in a timely manner and is tested through a robust plan-making process in accordance with national policy, national guidance, ...*

- 2.14 VWHDC accepted the recommendation of the Oxfordshire Growth Board which assessed Oxford's unmet need and agreed to accommodate an extra 2,200 homes<sup>2</sup>. However, this process now needs reconsideration because South Oxfordshire District, which published its Publication Local Plan in October 2017, has agreed not to accommodate 1,200 homes of its originally allocated unmet Oxford needs<sup>3</sup>. The shortfall of 1,200 homes will need to be made up., most likely in the area closest to Oxford - the VWH Abingdon and Oxford Fringe Sub-Area. This will have implications for the Radley NP.

### **3.0 COMMENT ON ANY CHANGES IN THE NP SECOND CONSULTATION DRAFT PROPOSALS**

- 3.1 There is much to support in the Draft NP, but without a realistic housing allocation which recognises the 'bigger picture' some proposals have a doubtful prospect of implementation. Some proposals are labelled 'PP' (Planning Policies) which is decisive, others are CA (Community Action) which can be seen as aspirational.
- 3.2 The D1 Report identified the following matters, and Comment is now given in this D2 Report on whether the submissions have been adequately addressed.

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<sup>2</sup> VWHDC Vale of White Horse Local Plan Update Bulletin 4 – October 2016

<sup>3</sup> 3,750 homes in LP Policy STRAT3, p33, not the 4,950 of the Growth Board Report of September 2016

## Housing

- 3.3 The D2 NP makes no changes to housing allocations: Radley is set to contribute just 25 additional homes to meet its share of District and Oxford needs, when it is a recognised key sustainable settlement in the important Abingdon and Oxford Fringe Sub-Area and part of the Oxford-Milton Keynes-Cambridge Growth Area.
- 3.4 There is still no supporting evidence that ‘reasonable alternatives’ have been investigated. There is no adequate explanation of the process which arrived at the identification of the two housing sites of the ‘old coal yard’ and the ‘central allotments’. The Sustainability Appraisal does not consider ‘reasonable alternatives’ to these sites as required, looking only at the ‘Radley Lakes’ environmental improvement proposals, and stating:

*5.1.3 More specifically still, this part of the report presents information regarding the consideration of reasonable alternative policy approaches to the Radley Lakes area, in the south of the plan area - see Figures 5.1. Planning for the Radley Lakes area is of central importance to the achievement of RNP objectives (iv) and (v), as discussed further below.*

*What about other plan issues?*

*5.1.4 Whilst the plan will set policy to address a range of other thematic issues through development management policy, these policy areas have not been a focus of alternatives appraisal, and hence are not discussed further here, within Part 1 of the report (but are a focus of Part 2).*

- 3.5 The ‘thematic issues’ are environmental, not land use or site-specific issues.
- 3.6 This lack of evidence and examination of reasonable alternatives seems contrary to Government Planning Practice Guidance:

*PPG 040 Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.*

*PPG 042 A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual*

*sites against clearly identified criteria. Guidance on assessing sites and on viability [is provided - see PPG].*

### **Community Facilities**

- 3.7 The relocation of the Village Hall and playing field is clearly contentious, and has been an on-going problem since 2008, as recorded on pp 19, 21 of the Draft1 NP. The existing site is owned by Radley College and leased to RPC. Playing fields to the south are on land owned by clients of AWEL.
- 3.8 After considering two proposals by owners of the land (Radley College and AWE on behalf of the owners of the playing field) to provide improved facilities, these are rejected in favour of 'retaining the facilities on the current site' (without further detail and without decisive comment on third party land ownership) and to support additional provision outside the village on the North Abingdon site<sup>4</sup>.

### **Radley Lakes**

- 3.9 Whilst this is a central proposal<sup>5</sup> there is still no explanation within the NP of 'delivery', 'funding', or 'viability'. Also, nor is there still no such explanation for the equally important new access road to Audlett Drive, Abingdon to relieve Thrupp Lane<sup>6</sup>. Clearly, this would be an expensive project and there would be many other calls on funds raised by way of S106 and CIL. However, with only modest housing proposals, that funding would be also modest. Funds derived from the other two strategic sites would surely be directed to Abingdon and Kennington. The important contribution which could be made by an additional housing site at Radley South is not mentioned.

### **Highways and Access**

- 3.10 This Report supports all the Draft NP's policies and proposals. The new roundabout junction for Whites Lane, Foxborough Road and Thrupp Lane<sup>7</sup> is especially supported

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<sup>4</sup> D2 NP para 4.4.2 p 27

<sup>5</sup> ditto para 4.6.3

<sup>6</sup> ditto para 4.7.3

<sup>7</sup> ditto Map 8 p38

but, again, there is no explanation about delivery/funding etc. Again, the important contribution which could be made by an additional housing site at Radley South is not mentioned.

#### **4.0 THE CASE FOR RADLEY SOUTH**

- 4.1 The sustainability of Radley as a settlement and its suitability for making a meaningful contribution to the housing shortfall, of the Abingdon and Oxford Fringe Sub-Area and the un-met needs of Oxford, has been demonstrated in Section 2 above.
- 4.2 Radley is a sustainable settlement with its own station and ready access to Oxford by rail. It is acknowledged in the Cabinet Report (7.8.15) that Radley is one of the “*most sustainable larger village*” having “*excellent public transport links to Oxford, with a railway station*”. This was endorsed by the LP Part 1 Inspector: Radley is “*a ‘larger’ village with local services, including a station with direct trains to Oxford, Didcot and London*”<sup>8</sup>
- 4.3 The merits of Radley South were set out in the D1 Report, and remain entirely valid. The sustainability of Radley, and its ability to contribute to the growth needs of the area, are matters not addressed by the Neighbourhood Plan. The merits of the Radley South site, and the contributions it would make are not recognised:
- housing needs, including affordable housing
  - the realisation of the Radley Lakes proposals
  - the provision of a village hall and recreational hub
  - improved access to Thrupp Lane

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<sup>8</sup> Inspector’s Final Report 30.11.16 para 83

## 5.0 CONCLUSION

- 5.1 This Report has been submitted on behalf of AWEL in response to the consultation on the Radley Neighbourhood Plan Second Consultation Draft September 2017.
- 5.2 There are no substantive changes in the Second Consultation which alter the substance of our original objections. To avoid repetition, this second response should be read together with the first which was submitted in January 2017.
- 5.3 Emerging Government policy places even more emphasis on increasing delivery of more housing. The RNP's proposal for an extra 25 homes is well below that expectation for a highly sustainable settlement within the newly recognised Oxford-Milton Keynes-Cambridge Growth Corridor.
- 5.4 There is still no obvious assessment of options before two (small) sites are proposed for development. The new SA does not examine 'reasonable alternatives' for housing sites.
- 5.5 The RNP still contains many worthy aspirations which need to be turned into firm delivery proposals. The Draft NP highlights the dissatisfaction with the existing Village Hall and playing fields. It also has a worthy, but ambitious, strategy for creating 'Radley Lakes' and a new access to Audlett Drive, Abingdon. The school and community shop also seek support. These initiatives may founder through lack of funding.
- 5.6 There continues to be a strong case for allocating Radley South, not least because of the extra funding it could offer to the community facilities. Radley South would provide a new site to its east providing space for a new Village Hall, football pitches, cricket pitch, children's play area and a carpark. This would be major benefit to the village and resolve the problems with the existing site. If that were to be developed too (owned by Radley College but leased by RPC) then it could fund the works and build the Hall. Radley South could also make contributions to road improvements and the realisation of Radley Lakes.



5.7 AWEL will continue to seek to work with the Parish Council and the community, but will pursue, in every way possible, the allocation of the site and the recognition of the benefits that could be realised for Radley.