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**Susan Halliwell  
Director for Planning and Place**

**10 February 2017**

Radley Parish Council  
By email only: [clerk@radleyvillage.org.uk](mailto:clerk@radleyvillage.org.uk).

Dear Radley Parish Clerk

**Radley Neighbourhood Plan – Consultation Draft**

Attached are some comments on your consultation draft Neighbourhood Plan from colleagues at Oxfordshire County Council. Our comments are not comprehensive, but highlight some matters related to County responsibilities.

Much of the area is Green Belt. There are two new allocations for development in Local Plan Part 1 on land which has been taken out of the Green Belt (North West Radley and South Kennington). Land to the north of Abingdon has also been allocated for development (subject to a current application P17/V0050/O) and this land is within Radley Parish adjoining the Neighbourhood Plan area. The comments in this letter should not be taken in any way as restricting the future comments of the County Council on applications relating to these development sites, nor any other developments in the area.

Given the scale of development already planned, the draft Neighbourhood Plan proposes no additional allocations and envisages that additional development will be limited to infill within the existing built-up area.

The attached comments highlight some areas where further discussion is likely to be needed. I also note the list of Community Actions, summarised on page 43 of the Plan, not all of which have been considered in the comments attached and may need further discussion.

Yours sincerely

*Lynette Hughes*

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## **Comments on Radley Neighbourhood Plan – Pre-Submission Consultation Draft**

### **Education**

Radley Primary School is referred to in 4.5.1 as “not large enough to provide a place every year for every Radley child seeking a place there.” Most years, all on-time, in-catchment applicants can be admitted, but there have been occasional instances of the school being over-subscribed from within catchment. The school is certainly very full, and almost entirely with in-catchment children. We agree that additional primary school capacity will be needed to meet the needs of housing growth. Based on the proposal for 240 new homes, and allowing for some spare capacity, our recommendation is that the school expands to 1 form entry. Additional site area will be required, and we hope to work with Radley College to achieve this. We note that Policy CA.7 states that “RPC will press for and support the expansion of Radley’s primary school on or near its present site to be achieved in such a way that there is a high quality replacement building or extension, with resulting capacity sufficient to serve all in the parish except for those closer to neighbouring schools.”

St Swithun’s Primary School in Kennington is referred to in 4.5.1 as having “sufficient capacity to provide for children living in Kennington and in the north end of Radley parish when the proposed 270 new homes on the North Kennington site have been developed. It currently has a few vacancies in the main school.” To elaborate, the school only has a few spare places, but this is because it currently accommodates significant numbers of children from outside its catchment, in particular living in Oxford or Abingdon. The expectation is that, as additional places are provided in Abingdon and Oxford, this will release space in St Swithun’s for more local children. We do not expect to further expand St Swithun’s Primary School.

For Kennington, it is stated in 4.5.1 that “nursery provision is at present insufficient and will be further challenged by the proposed new development”. 4.5.2 then states the need “to ensure that the shortfall in nursery places is addressed and funding from the Community Infrastructure Levy applied” and policy CA8 states that “RPC will press for and support the expansion of nursery facilities at St Swithun’s primary school.” There are a number of different providers of early education and childcare within the village. County Council sufficiency data indicates that the available early years provision in the Kennington and South Hinksey ward currently just meets the need of the local population, but additional capacity would be required to meet additional demand for places created by housing developments. Information on the availability of early years and childcare provision is available at [Childcare and Early Education | Family Information Directory](#)

### **Minerals and Waste**

We support the recognition that minerals are a County Matter and hence outside the scope of neighbourhood plans. Our officers have attended meetings in respect of a number of issues and would welcome further discussion.

## **Environmental Strategy**

We support the attention that is given to landscape, biodiversity and greenspace issues and welcome the support that is given to the need to actively seek biodiversity gain associated with new development.

Please note that Local Wildlife Sites are designated by Thames Valley Environmental Records Centre, not the County Council.

## **Countryside Access Team**

The OCC Countryside Access Team (Public Rights of Way) would support the aspirations of the Radley Cycling and Walking Strategy within Chapter 4 of the Neighbourhood Plan as it meets the aims of the adopted Rights of Way Management Plan 2015-2025. If landowner permission for potential improvements to public rights of way and appropriate funding are obtained then the team would be happy to work with the community to plan and achieve improvements on the ground.

We have not considered proposals for any changes to public rights of way and would encourage further discussion on any such proposals.

## **Transport Strategy**

Our officers attended a meeting on 19<sup>th</sup> October 2016 and provided some advice at that stage. We have not been able to review your Roads Strategy or the related Policy 13 within the timeframe for comments, but welcome further discussion with yourselves and District officers.

## **Cycling**

In general the plan appears positive for walking and cycling and the County Council supports the inclusion of cycling aspirations in neighbourhood plans.

Caution should be exercised with proposals for new cycle / pedestrian routes across fields – these are normally only possible with a co-operative landowner, who either needs to dedicate rights or sell required land.

Routes towards Oxford:

- We agree with the suggestion that Sustrans NCN route 5 should go through the South Kennington development site (map 8, B).
- While the route parallel to the railway has benefit (map 8, A), particularly for Radley village itself, there are likely other priorities for the County Council given the existing roadside route.

Routes towards Abingdon:

- The unsatisfactory situation on Thrupp Lane created by HGVs is noted and the County Council would like to see a satisfactory resolution to the problem.

- While the Thrupp Lane route is designated as part of the National Cycle Network, connecting Radley to Abingdon and beyond, other routes to Abingdon should not be overlooked – particularly via White’s Lane, possibly Path 8 and then Audlett Drive or Radley Road. With Radley Road traffic calmed and Audlett Drive benefitting from off-carriageway cycle provision throughout, these routes are important options for journeys to Abingdon from both the existing village and development site. A journey to Abingdon from the White’s Lane / Church Road junction is in the region of 2km shorter via White’s Lane, Path 8 and Radley Road than the equivalent Sustrans route 5. The North West Radley development should fund improvements to the route along White’s Lane and Path 8 as part of North West Radley development, for example by better integrating Path 8 at the Radley end, either to the carriageway or by extending it further along White Road – perhaps integrating it with provision in the development site, and with provision of some form of lighting, to create a fully lit route to Abingdon.
- While the above in no way seeks to lessen the issue with Thrupp Lane, equally, the Thrupp Lane situation should not overshadow useful improvements on other routes.

## **Public Health**

Although several criteria with direct relevance to public health are included in Part 2, such as the desire to protect the “sense of community”, improve community facilities and ensure “all parts of the parish are readily accessible by foot and bicycle” neither the Vision nor the Objectives make overt reference to improving the health and wellbeing of residents. Key general points to consider including in this section and linking in with the Planning Policies that follow might include encouraging the development of an environment which:

- provides opportunities for people to be more active (although improving health and wellbeing is included within Part 4.8.2 the “Cycling and Walking Strategy for Radley” it could also be used to reinforce the case for active travel infrastructure to schools, pedestrian crossings and the provision of new playing fields/leisure and recreation facilities).
- provides opportunities to make healthier food choices (this could be linked to the aspiration to expand the community shop and the provision of additional allotments)
- fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness (this could be linked to the aspiration to bring community facilities together as set out in Part 4.4.1, the desire for any extension of Radley Primary School to be constructed with wider community uses in mind and the development of Radley Lakes for quiet recreation and leisure purposes).
- enables people to maintain their independence for longer (although it is recognised that the needs of an increasing proportion of older people must be met with specific housing types, this could also be used to make the case for new builds to meet ‘lifetime homes’ standards, locally accessible amenities and services, and public realm that considers the needs of older people, such as bus stops with suitable seating)

The above are supported by NPPF paragraphs 7, 35, 50, 69, 156 and the PPG ‘Health and Wellbeing’ chapter and would also help to make the case for CIL funding.

Although Part 4.5.2 cites “reducing the use of the car for the school run” it does not set out the health and wellbeing benefits of active travel to school. To help improve pupil wellbeing and academic attainment whilst also reducing inactivity, obesity, air pollution and congestion I strongly recommend that the health and wellbeing benefits of active travel to school are included within the criteria for this section. The above is supported by NPPF paragraphs 35 and 38.

In Part 4.7 ‘Roads’ cycling and walking are repeatedly labelled as ‘leisure’ activities whilst Part 4.8.2 the “Cycling and Walking Strategy for Radley” clearly highlights their importance as a healthy and efficient mode of transport to local amenities and facilities, schools, nearby settlements and the railway station. I strongly recommend that unless referring to quiet recreational areas, such as Radley Lakes, cycling and walking are always considered in both a utility and recreational capacity. The above is supported by NPPF paragraphs 35, 38 and 69.

To maximise the behavioural change potential of new active travel infrastructure, we strongly recommend that Part 4.8.2 the “Cycling and Walking Strategy for Radley” highlights the importance of appropriately phased development i.e. people moving into new developments are more likely to adopt healthier day-to-day lifestyle habits when health promoting infrastructure, such as walkways and cycle paths, is already in place. The above is supported by NPPF paragraph 177.

## **Radley Lakes Area**

The draft Neighbourhood Plan includes a lot of text about the Radley Lakes Area explaining the issues and proposing a new strategic approach and long term vision. Careful consideration will be required as to what should be included in the Submission Neighbourhood Plan. It may be that a separate document is required if proposals do not sit well within the Neighbourhood Plan format.

At this stage, comments are provided at officer level and no wider County view has been prepared in respect of the intentions apparent in the draft Neighbourhood Plan to masterplan the area. The principles set out are about working towards a goal of quiet recreation and nature conservation in the area in a way that is consistent with the existing planning permissions for minerals extraction and commercial uses, and improving road access.

The draft Plan discusses concerns regarding the condition of the existing road access via Thrupp Lane. We recognise these concerns, but it should not be intimated that there is a quick or easy solution. For example, given the Green Belt status, it is not clear that new roads or more development as are suggested are possible. Closure of a Byway Open to all Traffic (BOAT) would not be straightforward nor the outcome guaranteed. It may also not be the case that the County Council would adopt any new road and thereby accept responsibility for additional maintenance.

It is noted that Map 5 on page 28 refers to the possibility of housing on the Old Coal Yard. This is in the Green Belt and would not be infill of the existing village as explicitly stated elsewhere in the draft Neighbourhood Plan, so such a proposal appears inconsistent. The site also appears adjacent to a scheduled monument.

The Neighbourhood Plan should not include proposals for roads etc which are not likely to be able to be achieved given the powers of the planning authorities. Further consideration should be given to the text of policies 11 and 12 and the related Community Action 9, and we would welcome discussion with yourselves and District officers.