



Watlington Neighbourhood Development Plan

Response by Watlington Parish Council to Points for Clarification for the Examination - February 2018

Paragraph 2.6

1. The first paragraph mentions traffic surveys from 2015. Are there any more recent studies? I can see the strategic approach for the Plan in the fifth paragraph of this section of the Plan. Were other approaches considered? If so how was the preferred strategy chosen against the other options?

1.1 The Parish Council arranged for volume and speed surveys to be carried out by OCC at Christmas Common Road (October 2015), Brook Street and Howe Road (May 2016). These indicate a 5% increase in traffic but are not directly comparable with the survey carried out by Transport Planning Practice (TPP)¹ in September 2014 (2015 is given in the WNDP documents. This will be corrected). The data collected by TPP for the report was used by Mode Transport Planning for the Watlington Traffic Management Plan (WNDP 13) produced in October 2017. More recent evidence is contained in the Oxfordshire Infrastructure Strategy November 2017.²

1.2 There is other evidence which underpins the proposal to re-align the B4009 which has been used in ongoing discussions with SODC, OCC and developers:

- i) Data published in the Briefing Pack³ to support the Chalgrove Airfield Site 'Enquiry by Design' event in January 2017. This data was provided by AECOM and has been used at the meetings we have had with Homes England. Notes of these meetings are on our website.
- ii) The AADT figures⁴ produced annually by OCC have been used as base data.
- iii) Transport assessments produced for each of the 'live' planning applications submitted to SODC for Watlington NDP Site A⁵ and Pyrton sites PYR 1⁶ and PYR 2⁷
- iv) SODC Emerging Local Plan Transport Policies⁸

1.3 The strategic approach to traffic:

¹ Watlington Traffic Study. TPP Report.

² Oxfordshire Infrastructure Strategy November 2017

³ Chalgrove Airfield Briefing Pack January 2017

⁴ OCC AADT Figures for 2016

⁵ Archstone/Bloor Homes Planning Application Transport Assessment

⁶ Beechcroft Victoria Land Planning Application Transport Assessment

⁷ Providence Land Planning Application Transport Assessment

⁸ SODC Emerging Local Plan Transport Policies

- i) The WNDP has been guided by the strength of local opinion. The opportunity to plan locally for growth of the town brought with it the chance to improve traffic congestion and air quality in the town centre which are key issues identified by residents from Consultation 1⁹ through to the recent SODC Consultation.
- ii) Workshop events for local residents were held in October 2014.¹⁰ Outcomes demonstrated a clear preference for a new route for traffic round the west side of the town.
- iii) Alternative approaches were put forward for consultation in January 2015 (Consultation 2)¹¹. Three possible road development options were put forward: these were for the town to expand to the east, the south or the west, each option including a possible new route for traffic around the town. A fourth option was put forward for a strategy called 'Pepperpot' which spread housing development sites around the town without new road provision. At this stage the WNDP was based on the SODC Core Strategy which allocated 79 new homes to Watlington. 278 questionnaires were returned. Analysis showed a clear preference for expansion of the town to the west to include an alternative route for traffic.
- iv) In order to check if public opinion had changed, a series of Roadshows¹² were held in June 2016. By this time the number of new homes to be provided in Watlington had increased from 79 to 200 in the emerging Local Plan. In view of the substantial increase in the scale of development, a revised route for a new road to the north/west of the town was put forward. This no longer included the use of Willow Close but moved the indicative route further north in order to accommodate a greater level of housing development and to provide a new 'edge' to Watlington. This will enable new development to be well integrated into the existing settlement and provide good connectivity which will also benefit existing residents in Marlbrook.

The alternative approaches which were put forward on the feedback form¹³ were:

- A. Spread 200 new homes on sites around the town but no new route for traffic?
- B. Build new homes on the string of sites between Pyrton Lane and Britwell Road so that a new route through these sites can be provided for traffic around the town?

252 feedback forms were returned. Analysis showed that support for development to include a new route had increased since 2015. The most favoured sites for development were identified by number as 11 and 12 (WNDP Site A), 9 (WNDP Site C) and 10 (WNDP Site B).

- v) In view of the strong public support for the provision of an alternative route for the B4009, and for the choice of development sites, these proposals were taken forward in drafting the WNDP.
- vi) The Development Strategy Topic Paper (WNDP 12) details the review of options in paragraph 2.2.

⁹ WNDP Consultation 1

¹⁰ WNDP Workshops October 2014

¹¹ WNDP Consultation 2

¹² WNDP Roadshows June 2016

¹³ WNDP Roadshows Feedback Form

- vii) The Sustainability Appraisal (W NDP 4) details the sustainability of W NDP core objectives which include resolving traffic issues at 5.2. Section 6 gives information about the site selection process and how alternative approaches were assessed.
- viii) The pre-submission consultation (Consultation 3)¹⁴ in 2017 confirmed that there is increasing support for the re-alignment of the B4009 and development of the town on Sites A, B and C with 86% of 527 responses in agreement with the Plan.

Paragraph 2.7

2. Please can I see a copy of the SODC Air Quality Annual Status Report 2016.

2.1 The 2016 and 2017 reports will be sent as requested. The SODC Low Emissions Strategy, which underpins proposals in the reports will also be sent.

Policy P1

3. I can see that the policy is intended to have general effect. Nevertheless:

- **does it need to be clear that it should be read in the context of other Plan policies?**

3.1 Yes. Although compliance with other policies is not stated, it is the intention that all relevant policies in the Plan would apply to applications for development.

- **does it refer only to Watlington (as the settlement in c) rather than the other settlements in the Plan area?**

3.2 Although the town of Watlington is the main focus of the policy and criteria it is intended that some of the criteria – a, the first part of b, e and f should apply to all the settlements within the W NDP area. We would welcome a modification to clarify this intention.

4. Do you want me to address W NDP11: Watlington Design Guide as part of the examination? Given the prominence of Watlington Hill and the view that it affords over the wider landscape in general, and the town in particular, is criterion d) realistic? Should its approach be more general?

4.1 We want the Watlington Design Guide (W NDP11) to contribute a local layer of guidance on design approaches to development in the W NDP area in addition to the SODC Design Guide.¹⁵ Please address it in your examination. We have noted your comments and the SODC comments and will make amendments to the Guide as suggested.

4.2 Policy 1 (d) relates specifically to the town rather than the wider area. Policy 3 (a) is the more general landscape policy. The intention is to ensure that the setting of the town at the foot of the escarpment is a key consideration in determining planning applications, especially as the main development sites cluster around it. We agree that it would not be realistic to intend that the views remain unchanged. The purpose of the criterion is to ensure that the impact on views of the town is minimised as far as possible – for example by mitigation through design, landscaping and tree planting on the development sites.

¹⁴ W NDP Consultation 3

¹⁵ SODC Design Guide

Policy P2

5. Criteria b – should this be expressed in a positive rather than a negative format by identifying what will be supported?

5.1 Policy P2 (b): this policy was suggested in the Health Check.¹⁶We agree that it could be re-phrased to in order to express it more positively. For example, could it be changed to the following or similar? ‘Proposals for development which are likely to have severe adverse impacts on the transport network through significant increases in the volume and type of traffic will be required to demonstrate how improvements within the network can be undertaken to avoid or minimise those impacts.’

6. Criteria d – is this a non-land use policy that should be relocated to a separate part of the Plan or given the lack of any clarity on the range of strategies should it be relocated into the supporting text?

6.1 Policy P2 (d): We would like to retain a criterion to reference the TMP. Would it be possible to modify this criterion? Our intention is to ensure that proposals for development which may contribute to the enhancement of the town centre will be guided by the Watlington Traffic Management Plan (WNDP 13).

Policy P3

7. As with Policy P1 I can see that this policy is intended to have general effect. Nevertheless:

• does it need to be clear that it should be read in the context of other Plan policies?

7.1 Yes. It is intended that all relevant policies in the Plan would apply to applications for development.

• does it apply throughout the Plan area?

7.2 Yes. This policy is intended to apply to the whole area. Although specific public viewpoints are included, Policy 3 (a) is intended to include views **of** the AONB from within the WNDP area as well as the identified views **from** the escarpment.

Policy P4

8. In part a) should the Plan set out the amount of green space required?

8.1 Policy P4 (a): We have not been able to find guidance about the amount of green space which can be indicated for development sites. Our intention is to encourage high quality spaces which are integral to the design of the development and not just ‘left over’ areas. We would like the provision to be as generous as possible in relation to the viability of each site. The recent Landscape and Visual Review¹⁷ carried out for SODC on the LVIA for WNDP Site A indicates that 39% of open space is generous but in line with other development schemes on edge of settlement sites. Could this be used as a guideline?

¹⁶ WNDP Healthcheck

¹⁷ Site A (Archstone/Bloor) LVIA Review Report

8.2 We note that the emerging Local Plan has no guidance on this and includes no targets for the provision of open space. We have referred to NPPF 58 which says that policies for development should aim to ‘create and sustain an appropriate mix of uses (including incorporation of green and other public spaces.....)’ and 73 which says that planning policies should be based on up-to-date assessments of the needs for open space, sport and recreation facilities and opportunities for new provision. Neither of these paragraphs contain advice about the amount of green space to be provided. We have not detailed specific provision in the WNDP because this has not been prioritised yet. However, SODC notes (consultation response 52)¹⁸ that there is an identified need for additional facilities for tennis and football and improved multi use games areas.

8.3 Guidance in the South Oxfordshire Design Guide is also not specific about the amount of green space which should be provided. Part 2 Section 9 includes the statement that new development should ‘have a range of open spaces with a clear purpose that are accessible and can be used by all’. In the absence of any other guidance we would agree to use this text in criterion (a) if a modification would clarify our intention.

9. In part b) WNDP 10 is very comprehensive. Nevertheless, the policy is not a policy as it does not identify the implications of LGS designation. Unless you comment otherwise I propose to recommend a modification to ensure that the policy complies with paragraph 78 of the NPPF.

9.1 The aim of this policy is to protect the spaces which are listed from harmful development. We want to be able to include (b) in the policy for green spaces and have assessed the sites in accordance with NPPF 77. We would welcome a modification which will allow this to comply with NPPF 78.

Policy P5

10. Is it intended that criteria c) to g) apply to the range of sites identified in both categories a) and b)?

10.1 Criteria (c) to (g): these criteria are intended to apply to all proposals for development with the exception of (e).

10.2 Criteria (e) for affordable housing is important. Could it be moved to become criteria (c) before the criteria which are ‘in addition’? The following criteria would then need to be re-numbered.

11. If so c)/d) may be impractical to apply to the smaller schemes. By definition e) cannot apply to the smaller schemes.

11.1 Our aim in identifying the criteria (c) and (d) is to try to ensure that all development, including smaller sites, makes a contribution to a good overall mix of housing types and contributes to the range of housing needs identified in the Watlington NDP area. Even small sites can contribute to a diversity of types of housing and meet diverse needs. We would welcome a modification which makes this clear.

¹⁸ SODC – WNDP Consultation Response 5

Policy P6

12. In general terms the policy reads well. However, for clarity should there be an 'or' at the end of each criterion? Plainly few, if any, schemes would satisfy all the criteria listed.

12.1 Could it be 'and/or'? If not, 'or' is agreed. We would prefer to include 'and' in order to avoid compliance with one of the criteria removing the need to address any of the others.

Policy P7

13. Would any development need to comply with just one or all the criteria?

13.1 All development proposals which increase opportunities for employment should comply with (a).

13.2 Compliance with criteria (b) and (c) is not expected for all development. These criteria are intended to be indicative of the type of businesses we would particularly support. We note that the SODC Business and Innovation Strategy¹⁹ (March 2017) states that there is a lack of suitable business start-up and grow-on space which limits business growth and that there is a strong demand for small-scale, affordable workspace. The intention of these criteria is to encourage developments which would benefit the local economy and provide more jobs for a growing population.

Policy P8

As Policy P6 – **12.1**

Policy P9

14. Criterion a) suggests that the priorities have not yet been determined. However, the supporting text lists the priorities. Was it your intention that there should be a connection between the two?

14.1 The text of (a) is correct. No priorities have been agreed yet regarding the order in which CIL funded projects may be brought forward. It is our intention that (a) and the list are connected.

14.2 The list is made up of projects/works which have been identified during the course of developing the WNDP by the various working groups and is not in an order of priority. We agree that this could be clarified in the supporting text. The first line of the text could be modified to read: 'The following infrastructure projects have been identified during the preparation of the WNDP and will be prioritised as CIL funding become available'. The existing text : 'Outcomes of assessment will prioritise the following' could be deleted if that would make our intention clearer.

15. Criteria b/c – I see these statements as supporting text rather than policy. Any comments to the contrary are invited.

15.1 We agree that criteria (b) and (c) should be deleted from the policy and included in the supporting text.

¹⁹ SODC Business and Innovation Strategy March 2017

Section 6

Site A

16. What is meant by 'sufficient space' for informal recreation areas and sports areas?

16.1 The aim is to ensure that the site includes generous, well designed spaces for informal recreation and sports areas commensurate with the developable area of the site. We are aware that there are standard requirements for LEAPs and LAPs. We have not been able to specify what level of green space provision would be considered 'sufficient' in terms of a percentage of the site. Please see our detailed response to Policy P4.

17. The policy seeks to safeguard a route for a re-aligned B4009 within the site rather than require its delivery as part of the site's development. Could the development of the site be satisfactorily incorporated into the fabric of the town without the associated road being constructed and open to traffic?

17.1

- (i) In the process of drafting the Plan, SODC advised that it would be acceptable for a NDP policy to require land to be safeguarded for infrastructure without requiring its delivery as part of a site's development. This policy was adopted in line with the Emerging South Oxfordshire Local Plan Policy Trans 3. In the light of ongoing movement towards the delivery of the proposed re-aligned B4009 we agree that this policy could be modified.
- (ii) The construction of the re-aligned B4009 is fundamental to the successful growth of the town. We have been discussing the delivery of the new road with SODC, OCC, Homes England and the prospective developers and have moved towards reaching agreement on delivery. Design parameters for the road were agreed on 19.01.18²⁰.
- (iii) With regard to site A: it would be reasonable to require the delivery of the road on the developable part of the site. Archstone/Bloor Homes have agreed to include this in an amended planning application. However, the site includes approximately 4 hectares of land in flood zones 2 and 3 which are not developable. Archstone/Bloor are willing to safeguard a route on this land but say that it would not be commercially viable to construct the road on this part of the site.
- (iv) The site is part of an integrated plan for the growth of Watlington. Current guidance from OCC and SODC indicates that delivery of the re-aligned B4009 will be required in order for all three sites allocated in the WNDP to go forward. (See OCC highways objections to planning applications P16/S2576/O (PYR2) and P17/S3231/O (Site A).
- (v) It may not be possible for the development at Site A to be incorporated into the fabric of the town in a way that is satisfactory without the proposed re-alignment of the B4009 being fully constructed. Traffic associated with the development could contribute to congestion in the town centre leading to an adverse impact on air pollution and the health and wellbeing of residents.

²⁰ AECOM Notes on Design Parameters for the Edge Road. 19.01.18

- (vi) A recent High Court judgement (06/11/17)²¹ provides case law to show that adverse impact on an Air Quality Management Area justifies the refusal of planning permission.

18. How has the proposed allocation of the site taken account of the adjacent Watlington Industrial Estate? Can the two different uses comfortably co-exist in this part of the town?

18.1 Site A is suitable for development and no problems about the location of site A adjacent to the Industrial estate were identified during the site selection process. We consider that the two uses on adjacent sites can co-exist without adverse impacts on each other.

- (i) Concerns that noise issues could be a problem for LCP Properties and their tenant businesses arose late in the WNDP process.
- (ii) LCP Properties responded to the SODC consultation on the WNDP but did not respond to earlier consultations. Contact was made with the company in February 2016 to confirm their future plans for the site. Communications with the tenant businesses have been ongoing via the distribution of information leaflets and links to the website. There have also been numerous items about the progress of the WNDP in the local press.
- (iii) It is expected that technical issues regarding any required mitigation regarding noise will be dealt with by SODC as part of the planning application process
- (iv) The construction of the re-aligned B4009 to enable planned growth of Watlington will benefit businesses on the Industrial Estate. HGVs and other vehicles having business on the estate will be able to use the new section of the route without having to travel through the centre of Watlington.

Site B

19. The policy seeks to safeguard a route for a re-aligned B4009 within the site rather than require its delivery as part of the site's development. Could the development of the site be satisfactorily incorporated into the fabric of the town without the associated road being constructed and open to traffic?

19.1

- (i) In the process of drafting the Plan, SODC advised that it would be acceptable for a NDP policy to require land to be safeguarded for infrastructure without requiring its delivery as part of a site's development. This policy was adopted in line with the Emerging South Oxfordshire Local Plan Policy Trans 3. In the light of ongoing movement towards the delivery of the proposed re-aligned B4009 we agree that this policy could be modified to require the delivery of the re-aligned B4009 as part of the site's development.
- (ii) The construction of the re-aligned B4009 is fundamental to the successful growth of the town. We have been discussing the delivery of the new road with SODC, OCC, Homes England and the developers and are moving towards reaching agreement on delivery. Design parameters for the road were agreed on 19.01.18.

²¹ High Court Judgement by Mr Justice Supperstone

- (iii) The site is part of an integrated development plan for the town. If the site was delivered without the re-aligned B4009 being fully constructed and open to through traffic this would prevent the growth proposed in the WNDP from being achieved. Current guidance from SODC and OCC indicates that delivery of the re-aligned B4009 will be required in order for all three sites allocated in the WNDP to go forward. (See OCC highways objections to planning applications P16/S2576/O (PYR 2) and P17/S3231/O (Site A)).
- (iv) It may not be possible for the development at Site B to be incorporated into the fabric of the town in a way that is satisfactory without the proposed re-alignment of the B4009 being fully constructed. Traffic associated with the development could contribute to congestion in the town centre leading to an adverse impact on air pollution and the health and wellbeing of residents.
- (v) A recent High Court judgement (06/11/17) provides case law to show that adverse impact on an Air Quality Management Area justifies the refusal of planning permission.

20. What is meant by ‘land’ for green spaces and ‘space’ for an informal recreation area? How would a developer or SODC have any clarity on the amounts of land required?

20.1 We accept that these terms are vague. The criteria are intended to ensure that well designed and generous spaces are provided on all the sites allocated in the WNDP. Please see the detailed response to Policy P4. We would welcome proposals to modify these criteria to make them clear.

Site C

21. The policy seeks to safeguard a route for a re-aligned B4009 within the site rather than require its delivery as part of the site’s development. Could the development of the site be satisfactorily incorporated into the fabric of the town without the associated road being constructed and open to traffic?

21.1

- (i) In the process of drafting the Plan, SODC advised that it would be acceptable for a NDP policy to require land to be safeguarded for infrastructure without requiring its delivery as part of a site’s development. This policy was adopted in line with the Emerging South Oxfordshire Local Plan Policy Trans 3. In the light of ongoing movement towards the delivery of the proposed re-aligned B4009 we agree that this policy could be modified to require the delivery of the re-aligned B4009 as part of the site’s development.
- (ii) The construction of the re-aligned B4009 is fundamental to the successful growth of the town. We have been discussing the delivery of the new road with SODC, OCC, Homes England and the developers and are moving towards reaching agreement on delivery. Design parameters for the road were agreed on 19.01.18
- (iii) The site is part of an integrated plan for the growth of Watlington. Current guidance from SODC and OCC indicates that the site is unlikely to be able to be developed without the re-aligned B4009 being fully constructed and open to through traffic. (See OCC highways objections to planning applications P16/S2576/O (PYR2) and P17/S3231/O – (Site A)).

- (iv) It may not be possible for the development at Site C to be incorporated into the fabric of the town in a way that is satisfactory without the proposed re-alignment of the B4009 being fully constructed. Traffic associated with the development could contribute to congestion in the town centre leading to an adverse impact on air pollution and the health and wellbeing of residents.
- (v) A recent High Court judgement (06/11/17) provides case law to show that adverse impact on an Air Quality Management Area justifies the refusal of planning permission.

22. As with Sites A and B several of the criteria are vague. Criteria 4-6 are clear examples. Is there any information on the community's expectations?

22.1 We accept that these terms are vague. The criteria are intended to ensure that well designed and generous spaces are provided on all the sites allocated in the WNDP. Please see the detailed response to Policy P4. We would welcome proposals to modify these criteria to make them clear.

23. Criterion 3 fails to provide any clarity for a developer on the educational requirements arising from the development of the site, the relationship between the development of the site and the expansion of the school and the process by which other sites are being explored. Is there any detail on this issue? Is it being addressed more widely by the prospective developers of the three sites and/or by public bodies?

23.1 OCC required the WNDP to safeguard land to meet the need for possible expansion of Icknield Community College and Watlington Primary School and proposed the text in criterion 3. This was confirmed in the OCC response to WNDP Consultation 3 and the response (63) to the SODC Consultation on the WNDP²².

23.2 OCC estimates that 4.4 hectares, in addition to the existing site, would be required to provide for a 1500 pupil secondary school. This requirement is included in the OCC response to the SODC consultation on the WNDP.

23.3 Site C is approximately 4.6ha so only just capable of providing the additional land required by the school. However, there would not be enough space for the school, the re-alignment of the B4009 and landscaping etc. In addition, the site would not be desirable for an extension of the school because it would be crossed by the re-aligned B4009.

23.4 There is no detail on this issue. The WNDP team has had meetings at OCC to seek clarification and have attended a meeting at Icknield Community College with OCC, governors, the Head and the College's Business Manager. However, any decision on the future requirements of the school will be delayed until a decision is reached on the development of Chalgrove Airfield.

23.5 If planning permission is granted for the development on the airfield proposed by Homes England, a secondary school would be built in the second phase of the development which could be 2026. Icknield Community College is expected to re-locate to the new 1500 pupil school at that time. In that event, the land safeguarded for the school's expansion would not be required.

23.6 The prospective developers of Site A and Site B have not been involved in discussions about the possible expansion of the school. The sites do not adjoin the existing site and OCC is likely to oppose a split site on logistical and cost grounds.

²² WNDP Consultation 3 & Response to SODC Consultation (63)

23.7 Land for the expansion of the school is available elsewhere. Providence Land is the prospective developer of the site PYR 2 which is adjacent to Icknield Community College. The site is within Pyrton parish so is outside the area covered by the Watlington NDP. Providence Land has indicated that land could be safeguarded on PYR 2 to meet the OCC requirements for expansion of Icknield Community College. An indicative plan for the site is available (paper copy only).

Section 6.6

24. I can see that the focus in this section is on windfall development. I can also see that the level of detail in relation to the potential opportunities is significantly less than that available for Sites A/B/C.

On what basis has this approach been adopted? I can see that the three specific sites are being 'encouraged' rather than allocated. No clarity is provided either to the site owners or to the District Council on the type of development which would be supported. On this basis should section 6.6 be addressed simply as supporting text and with the policy box removed?

24.1 The intention of this section is to encourage development proposals to come forward as detailed in the policy box. We agree that it is more appropriate to include this in the main text and to remove the box. The heading 'Additional Sites' could be retained.

Section 6.7

25 I can understand the thinking which underpins the first paragraph of this section. Nevertheless, as I read this section it directly conflicts with requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 which specifies that any plan must not relate to more than one neighbourhood area. In addition, some of the representations (not unreasonably) comment directly on sites PYR1 and PYR2 which are outside the neighbourhood area.

On this basis I intend to recommend that the whole of the section is deleted together with Figure 16 subject to any observations that the Parish Council may wish to make on this matter.

25.1 We agree that this section should be deleted.

Watlington Design Guide WNDP11

26. Please can I have your comments on the representations made by SODC to this part of the Plan?

In particular it would be helpful to have your thoughts on the first observation under the 'Other Comments' heading. As I read the document it covers an appropriate range of issues for the neighbourhood area. However, the distinction between general commentary, factual information and design guidelines is not immediately clear.

26.1 We accept your comments and the recommendations made by SODC for the improvement of the Design Guide. We are making the changes proposed. We confirm that we want to be able to include it as a tool for SODC and developers to use as a local guide in addition to the South Oxfordshire Design Guide produced by SODC.

All reference documents are available on the WNDP Website www.watlingtonnp.org.uk under 'Examination Reference Documents'

Watlington Parish Council

27/2/18