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**Director for Planning and Place
– Susan Halliwell**

2 June 2017

Watlington Neighbourhood Plan Committee
By email: wndp@watlingtonnp.org.uk

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Attn: Rachel Gill

Dear Watlington Neighbourhood Plan Committee

Watlington – Pre-Submission Draft Neighbourhood Plan

Thank you for the opportunity to comment on your draft Neighbourhood Plan at this stage before you finalise your Plan for Submission. As I did not hear back from you on my request for an extension of time, I am sending these comments.

Watlington is one of the larger villages in South Oxfordshire. The South Oxfordshire Local Plan Second Preferred Options, consulted on to May 2017, calculates that there is a need to allocate land for approximately 238 houses in Watlington on the basis of achieving a target of 15% growth between 2011 and 2033. Your draft Plan proposes to allocate land for a similar number of houses as follows:

1. A – Land between Britwell Road and Cuxham Road – 140 dwellings
2. B – Land off Cuxham Road and Willow Close – 38-60 dwellings
3. C – Land off Pyrton Lane – 60 dwellings

In respect of the above, no planning applications have been lodged. However, there has been a planning application in respect of land to the east in Pyrton Parish P16/S2576/O, for 100 residential dwellings, to which the County Council lodged an objection in October 2016.

The Local Plan Second Preferred Options also contains a proposal to safeguard land for an 'edge road' or 'bypass' which is similar to that contained in your Draft Neighbourhood Plan. We note that your draft policies to allocate land are demonstrably tied to the Neighbourhood Plan's vision to achieve that road.

Attached are some comments from the County Council and the Local Enterprise Partnership. These are officer comments made in good faith but do not restrict our ability to raise matters at the formal Submission stage of your Neighbourhood Plan.

Yours sincerely

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Senior Planning Officer

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**ATTACHMENT – COMMENTS FROM OXFORDSHIRE COUNTY COUNCIL
WATLINGTON DRAFT NEIGHBOURHOOD PLAN – JUNE 2017****Key Issues**

1. Is the proposal for an edge road justified with regard to traffic impact?
2. Can the proposed edge road be fully funded from development?
3. It should be made clear that Oxfordshire County Council does not have funding for an edge road in this location and is not seeking funding, given other priorities.
4. What are the Neighbourhood Plan's priorities for the spending of the Parish's proportion of CIL?
5. Does land need to be identified for expansion of the existing primary and secondary schools?
6. Should the Neighbourhood Plan address the possibility of Ickneild College relocating?
7. Additional nursery and early childcare places will be required in the area.

Transport Strategy Comments – The Edge Road

Page 35 contains a map showing the indicative route of a suggested 'edge road' that is proposed to by-pass the town centre and link the southern and northern sections of the B4009. The alignment as shown on the map is not the same as that shown as proposed for safeguarding in South Oxfordshire District Council's Local Plan 2033 'Second Preferred Options' consultation document. We would be interested to see Watlington Parish Council's comments on the Second Preferred Options if this would help clarify why the Parish Council is seeking a different alignment.



It is our view that safeguarding for a future road is appropriately achieved through a Local Plan, although it may be that the Neighbourhood Plan can identify the aspiration for a road. This may be a matter that an independent Examiner will take a view on once the Neighbourhood Plan is submitted. Certainly, the Neighbourhood Plan can allocate land for development having regard to the future alignment of a road.

The draft Neighbourhood Plan states on page 35, 'it is proposed that no planning permission shall be granted on any of the allocated development sites until and unless an agreed strategy (including funding), detailed plans and timetable for the re-aligned B4009 route is in place as approved by OCC, SODC and Watlington Parish Council; and that no infrastructure or housing construction shall be started on any such site unless the construction of the alternative route has been commenced to the agreed timetable'. This calls into question whether the Neighbourhood Plan allocations are deliverable as there is no project or timetable to agree such a strategy, and it is not yet known whether such a road is necessary or able to be funded.

We recognise that the Neighbourhood Plan group is working on evidence to justify the need for this proposed edge road. Evidence should include:

- Transport evidence/modelling to demonstrate the need for an alternative route.
- Evidence about whether air quality issues are a justification for the new road.
- Funding proposals recognising that contributions sought from developers must meet the relevant regulatory tests.

The alignment of the proposed future road is not entirely within Watlington Parish. Significantly, it extends to Pyrton Parish and there is no provision for the road within that draft Neighbourhood Plan currently being consulted on (in fact there are proposals which oppose the route).

The part of the road within Watlington Parish is also not likely to be entirely within the allocated sites boundaries. A roundabout at the western end for example, is likely to involve the use of third party land.

Logically this new edge road, if built, would become the new B4009 instead of the current route. As such, it will need to be built to a standard to accommodate current and future traffic. The County Council would recommend that it be built to a high standard with footway/cycle provision on each side. Some amendments to the text in the draft Neighbourhood Plan may be required to recognise this.

The County Council has not prepared a cost estimate but expects that the total cost of such a road could be in the region of £20m. Funding of the road is a key issue. The County Council does not have any funding that it is able to put towards this scheme and is not currently seeking funding for it. It is understood that the Neighbourhood Plan group are hoping that the road could be funded by a combination of funding/direct provision from developers and contributions from the Chalgrove Airfield developer on the basis that this road will provide direct mitigation of effects from that development.

It may be very difficult to get developers to provide an edge road to the appropriate standard. The County Council can only require contributions which meet regulatory tests in respect of being necessary, directly related to the development, and fairly and reasonably related in scale and kind to the development. It is also not clear how the road can be delivered if depending on different landowners on differing timescales.

At this point it is also not clear whether the County Council can require contributions from the Chalgrove Airfield developer towards this road, as the evidence of effects and need for such mitigation currently do not exist.

Policy 2a states that development sites 'will be required to safeguard a route for a realigned B4009'. This policy will need to be reworded as the term 'safeguard' appears to in respect of the formal safeguarding. The policy could perhaps require the setting aside of land which is safeguarded.

On Page 37 the policy for 'Site A' proposes traffic calming on Britwell Road and Cuxham Road. Further information on the scope of these measures and their nature must be provided so that the proposals can be assessed before this part of the policy can be supported. It is also recommend that the wording of the penultimate paragraph be amended to say that 'the design of the development should incorporate the safeguarding of land as part of the realigned B4009 as per South Oxfordshire District Council's Local Plan'. This comment applies to all three of the allocated sites.

The County Council has commented on the suggested safeguarding in Watlington, Benson and Stadhampton in the South Oxfordshire Local Plan Second Preferred Options consultation. The comments are reproduced below as they are also relevant to the Neighbourhood Plan:

(Oxfordshire County Council) understands that these new road proposals at Benson, Stadhampton and Watlington have arisen in various ways. The pre-submission neighbourhood plans for Benson and Watlington envisage these types of roads, and propose to provide land allocations in the vicinity of them. The Stadhampton proposal has arisen largely as a result of discussions about the effects on the road network of strategic development at Chalgrove Airfield. Further work on the Evaluation of Transport Impacts is required to fully assess these pieces of possible transport infrastructure. Alternatively, it may be that in the course of preparing an application for development at Chalgrove Airfield, that the developers will identify a need for such bypasses as part of their Transport Assessment. We understand that the District has chosen to propose these safeguarded routes at this point of time in order to test the proposals and receive consultation responses. The County Council seeks to be involved in the process going forward as to whether such roads should be safeguarded. If there is evidence to support safeguarding in the Submission Plan, then the County Council considers that the safeguarding needs to be wide enough to enable the new routes to effectively provide for future traffic by diverting the relevant A or B road.

(Oxfordshire County Council) queries whether these three bypasses are of sufficient importance to gain funding sufficient to secure their construction. There are many villages in the County which would benefit from a bypass, but the criteria for seeking funding from government are strict. The proposals at Benson and Watlington are for relatively limited amounts of Neighbourhood Plan housing which is not anticipated to fully fund a road of the scale required. Whether any requirement can be imposed on the Chalgrove Airfield developers to fund these will depend on whether such a requirement can be evidenced as meeting CIL regulations.

Other Transport Comments

Traffic Speed and Flow

On page 14, section 4.2 states an aspiration to reduce traffic speeds throughout the Parish. More information is required on the roads where speeding is a problem, and how the speed reductions will be enforced. Any measures will need to be self-enforcing, i.e. some form of traffic calming is likely to be needed depending on the road / location. Clarification is required on how any such measures will be funded.

Page 23 references data on traffic flows from 2015, though the source of this data is unclear. Has it resulted from surveys arranged locally?

Cycling and Walking

Paragraph 5.3 on page 19 defines Objective 4 of the Neighbourhood Plan, which among other things refers to the creation of a network of cycling paths and routes. It is suggested that this is amended to say 'cycling and walking paths and routes'. The County Council is fully supportive of such policies but this aspiration is likely to require significant funding which may not be able to be achieved through S106 contributions or use of CIL funds. Further detail would be helpful on specific links that are regarded as potentially beneficial to residents.

Page 26 suggests an aspiration to widen narrow pavements within the town where pedestrians often feel at risk from the close proximity of traffic, along with general improvements to enhance the town centre and subsequently promote tourism and economic activity. This suggestion needs to be balanced with the risk of narrower roads potentially forcing larger vehicles into closer proximity with the pavement, presenting a different type of risk to pedestrians. The overall impact and road safety implications of such a scheme on the highway as a whole would need to be assessed and a funding source identified. Further detail on locations of specific concern would be useful.

Public Transport

Objective 4 states that initiatives to improve public transport will be supported. It is not clear what form the suggested initiatives will take. Contributions towards 'pump-priming' bus service enhancements are likely to be sought by the County Council from development at allocated sites should they come forward, which are likely to benefit the wider populace as well as residents of new developments. Pump-priming is used to help bus services get to a point where they operate commercially and can therefore continue once the period of funding ceases.

Car parking

Objective 5b refers to improving car parking and signage. Funding for these improvements will be necessary. Further detail on the exact nature of what may be sought and where would be helpful.

Technical Comments

Policy 2b ('Improve and manage road traffic issues) states that 'development will only be permitted where it does not have a severe adverse impact on existing traffic pressures and air quality'. Consideration should be given to the substitution of the word 'permitted' for 'supported', as the decision on what development is permitted ultimately rests with the planning authority (in this case South Oxfordshire District Council). A similar change is also suggested to the wording of Policy 4 (New Housing Development).

Watlington Traffic Management Strategy

Reference is made on page 26 to the Watlington Traffic Management Strategy. It is recommended that the aims and suggested proposed measures within the strategy are included within the Neighbourhood Plan. These should also be discussed with and approved by Oxfordshire County Council as the highway authority. Policy 2b refers to 'traffic management strategies' and a requirement to contribute to costs through CIL or Section 106 funding, but it is not clear that such a requirement on developers would meet regulatory tests.

Page 32 refers to 'traffic management improvements' which Watlington Parish Council will use CIL money for. Some of the proposed improvements, such as a 20mph limit through the town, traffic calming measures, and a one-way traffic system, would need approval from the County

Council as Highway Authority and be subject to statutory processes. It is likely that some form of traffic calming in the centre of Watlington would help to encourage drivers to use a re-aligned B4009, but it would need to be carefully designed so as to avoid exacerbating congestion and/or air pollution.

Drainage

The Neighbourhood Plan should be promoting the use of SuDs on all developments and proposed new roads within Watlington which will not cause flooding and increase biodiversity. Drainage and the use of SuDS does not currently appear in the draft Plan.

Education

Summary

The 238 new homes proposed for Watlington in this Plan would be expected to generate in the region of 12 children qualifying for free nursery education (under current statutory entitlement), 60 primary pupils and 45 secondary pupils, assuming a housing mix in line with the existing SODC Core Strategy policies. In addition there is a statutory duty to ensure there is sufficient childcare to enable parents to take up or remain in work.

It is strongly recommended that the ability of Watlington Primary School to expand in future years is protected through this Plan, through consideration being given to how additional site area could be made available to the school should expansion become necessary.

It is also necessary that the Neighbourhood Plan protects the ability of Icknield Community College to expand either (in the absence of large-scale development at Chalgrove Airfield) on its current site, or (if Chalgrove Airfield is approved) through relocation of the school. To this end, the Plan may wish to consider policies relating to the potential redevelopment of the current Icknield Community College site.

In addition to primary and secondary school capacity, additional early education and childcare provision would be required to meet the extra demand created by the development proposed in this Plan. The Neighbourhood Plan may, therefore, wish to consider including policies supportive of the expansion and/or creation of early education and childcare facilities.

Detailed comments

Under Policy 6 (page 30) it is noted that “Local schools ... have the capacity to meet the needs of the current expected growth of Watlington.” This statement is not correct as detailed in the following comments.

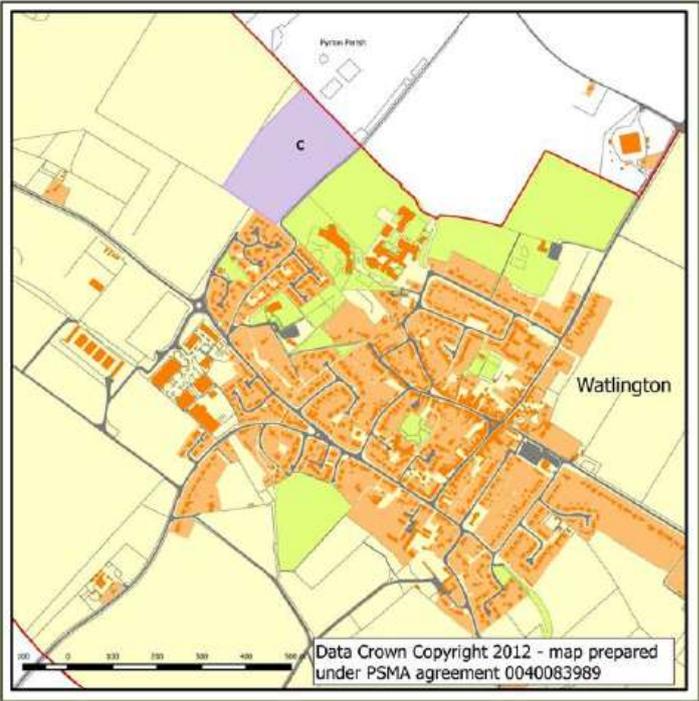
Primary education

Watlington Primary School is a 1.5 form entry school, admitting up to 45 children per year and with a total capacity of 315 places (excluding the nursery). As of January 2017 the school has 267 children on roll, with spaces in all year groups (although numbers fluctuate and some year groups have only few spare places) i.e. 48 spare places in total. At this moment, it therefore does not have sufficient capacity to meet the expected needs of the proposed scale of development. However, birth rates have slowed in recent years, resulting in lower primary school intakes. If this trend continues, the school would be able to accommodate the scale of housing growth indicated. Inevitably, there is uncertainty over future birth rates.

It is therefore strongly recommended that the ability of Watlington Primary School to expand in future years is protected through this Plan, but that such expansion cannot be assumed to be required in the immediate future.

Expansion of the school to 2 forms of entry (60 children per year, total capacity of 420 places) would offer benefits to school financial and organisational management. The school's current site area of approximately 1.8ha is below the county council's standards for a 2 form entry school, but the site adjoins that of Icknield Community College, and also the proposed development referred to in the Plan as site C (shown below). The comments regarding site C (page 40) note that "The site could provide land for the future expansion of Watlington Primary School or Icknield Community College." If additional site area could be transferred to Watlington Primary School, it would therefore be able to expand. However, to sustain pupil numbers, a 2 form entry level would require a higher scale of housing growth than that currently proposed for the village.

Site C - Land off Pyrton Lane



Secondary education

Icknield Community College is a 5 form entry 11-16 school, admitting up to 140 children per year and with a total capacity of 700 places. As of January 2017 the school has 611 children on roll, with spaces in most year groups (although numbers fluctuate and the school admitted over its admission number for 2016, and has allocated more places than its admission number for September 2017 arrivals, indicating growing demand for places at the school).

While it currently, therefore, has 89 spare places, more than the expected pupil generation from the proposed scale of housing growth within the Watlington Neighbourhood Plan, this number is expected to fall over the coming years. Moreover, the school serves a large designated (catchment) area, shown below, and will also be affected by the significant scale of development underway and proposed at neighbouring settlements such as Benson and Chinnor. The school does not have sufficient current capacity to meet the cumulative needs of development within its designated area.

It is therefore necessary to ensure the ability of Icknield Community College to expand in future years is protected through this Plan.

Location and Designated Area for Icknield Community College in Watlington



The future size of Icknield Community College needs to be considered in the context of the large-scale growth proposed in the recent SODC Local Plan consultation for Chalgrove Airfield, which lies within the school's designated area. Approximately 3,000 homes are being considered here.

The proposed Chalgrove Airfield development, in isolation, would not make a new secondary school sustainable without threatening the viability of Icknield Community College.

The combined impact of all the currently proposed scale of growth, in addition to the existing population, within Icknield's designated area would be expected to require a secondary school of around 1500 places. The county council's requirement, based on government guidelines, would be a site of 10.6ha for a 1500-place school.

Icknield Community College's current site area is approximately 6.2ha. Based on government guidelines, this is sufficient for 800-1000 pupils, i.e. 200-400 more than the current roll, and could therefore support some expansion of the school. This would not, however, be sufficient to meet the needs of the proposed Chalgrove Airfield as well as the permitted/planned/proposed growth within Icknield's designated area. (It would be expected to be sufficient excluding Chalgrove Airfield.)

If the proposed Chalgrove Airfield allocation is approved, a strategic solution will be necessary to provide secondary education across the area. This will require a larger site area being made available to Icknield Community College. To bring the current site area up to the standard requirement for a 1500 place school would require an additional 4.4ha being added to the current site.

The school's site is bounded by Watlington Primary School, the proposed development site referred to in the Plan as site C, and land in Pyrton parish. One option for expanding the school would therefore be for land within site C, or in Pyrton, to be transferred to the school. However, it may not be possible to provide sufficient additional land.

The County Council, in its response to the Local Plan Preferred Options has suggested that a possible solution would be for existing Icknield Community College to be relocated to Chalgrove Airfield, if that allocation is confirmed, to enable it to expand. This would bring benefits to the financial sustainability of the school, and enable it to widen its curriculum offer, most notably by extending its age range to include sixth form education, which is not viable at the school's current size. It would also enable complete replacement of the school's accommodation.

To fund the relocation and expansion of Icknield Community College, it would be necessary for the existing Icknield Community College site to be disposed of for development, and the resulting disposal receipt invested in the school's new accommodation. As noted above, some of the site could be transferred to Watlington Primary School, to protect its ability to expand if necessary.

Until the distribution of housing growth is confirmed through the SODC Local Plan process, it cannot be confirmed that the relocation of Icknield Community College would be either necessary or viable. At this stage, therefore, the Neighbourhood Plan needs to protect the ability of Icknield Community College to expand either (in the absence of large-scale development at Chalgrove Airfield) on its current site, or (if Chalgrove Airfield is approved) through relocation of the school. To this end, the Neighbourhood Plan may wish to consider policies relating to the potential redevelopment of the current Icknield Community College site.

Early education and childcare

In addition to primary and secondary school capacity, additional early education and childcare provision would be required to meet the extra demand created by the development proposed in this Plan. Current provision includes the nursery class at Watlington Primary School; the Rainbow Corner Day Nursery located within Icknield's accommodation; and Watlington Pre-School. However the Pre-school is expected to close in July 2017, which will reduce the availability of places locally and also the choices for parents. Any changes to the primary school or secondary school would also, therefore, need to include the retention, and potential expansion, of the relevant on-site early education and childcare provision. The Neighbourhood Plan may, therefore, wish to consider including policies supportive of the expansion and/or creation of early education and childcare facilities.

Public Health

We welcome the recognition that strategic planning has a role to play in improving the health and wellbeing of people living, working and visiting Watlington by taking account of traffic generated air pollution. However, as funding for a town bypass is uncertain, we recommend that a range of best practice measures are adopted to minimise exposure to and where possible reduce anthropogenic air pollution.

In line with the paragraph 124 of the National Planning Policy Framework (NPPF) and the draft NICE guidelines on 'Air pollution: outdoor air quality and health', we recommend that new development should be sited and laid out to minimise the need for motorised travel and that facilitates for more vulnerable groups, such as children and older people, are sited away from busy roads. To allow more local journeys to be made by non-polluting means and increase physical activity rates we support your aspirations for the development of a network of walking and cycling routes. Given the volume of locally generated traffic arising from school runs, specific reference could be made to the need for developing/upgrading walking and cycling infrastructure around schools and on routes from peripheral carparks to schools (and other amenities) that could be used for 'park and stride' initiatives.

To create a walking and cycling environment which is physically and emotionally accessible, particularly to more vulnerable groups, such as children and older people, we support your

aspirations for a combination of public realm improvements and traffic calming measures. However, in line with the draft NICE guidelines on 'Air pollution: outdoor air quality and health' we recommend that the focus of any traffic calming measures should be on speed reduction, such as 20mph zones, that still enable traffic to flow smoothly and avoid physical features, e.g. speed bumps and bumps, that encourage rapid deceleration and acceleration.

More generally the plan only makes aspirations for improving the health and wellbeing of people living, working and visiting Watlington in relation to improved air quality and sports and recreation facilities. Objectives within the plan to protect and enhance green spaces, green infrastructure, local food growing sites, community facilities and footpaths all have the potential to improve health and wellbeing in other ways such as: increasing opportunities for social interaction/reducing social isolation and loneliness; providing opportunities to make healthier food choices; enabling people to maintain their independence for longer; and providing opportunities for people to be more active. We strongly recommend that the broader health and wellbeing implications of the plan are stated within the Vision and Objectives and highlighted in the policies that follow. This approach is supported by NPPF paragraphs 7, 35, 50, 69, 156 and the PPG 'Health and Wellbeing' chapter.

Environmental Strategy

We welcome the recognition given to protection of the high value landscape of the Chilterns AONB.

We welcome and support the objectives that seek to protect and enhance the natural environment and to enhance biodiversity by linking areas of existing habitat. We would encourage the requirement for a net gain in biodiversity to be a feature of all new development.

We draw attention to the Chilterns North Escarpment Conservation Target Area (CTA) and ask that attention could be drawn to this within the NP as a priority area for biodiversity conservation. CTAs are areas of land identified at a county-wide scale as being important areas for biodiversity and opportunity areas in which biodiversity enhancements are likely to deliver the greatest results. For further information <https://www.wildoxfordshire.org.uk/biodiversity/conservation-target-areas/>.

The Neighbourhood Plan team should note the progress that has been made on the revised SODC Green Infrastructure Strategy (in draft) as a source of further information on green infrastructure (GI) opportunities. There is now strong evidence on the benefits of green infrastructure for people and communities. We welcome the support given to protecting existing green space and strongly support efforts to provide new green infrastructure, of many different forms, within the neighbourhood plan area and new developments in particular. We welcome the proposals for a strong green infrastructure element associated with the proposed new perimeter road – and note the potential to use green infrastructure to enhance the separation between people and vehicles.

We encourage the inclusion of biodiversity enhancement within the options for CIL funding.

Oxfordshire Local Enterprise Partnership

The Government advice on planning policy set out in the National Planning Policy Framework states that 'significant weight should be placed on the need to support economic growth through the planning system'. Oxfordshire Local Enterprise Partnership (OxLEP) is working with Local Planning Authorities and other partners to utilise the potential within the planning system to support and drive sustainable local economic growth.

OxLEP is responsible for championing and developing the Oxfordshire economy. Through the strategic priorities of people, place, enterprise and connectivity, OxLEP guides and shapes the economic growth of the county.

OxLEP is supportive of Neighbourhood Plans and of policies which relate to the priorities identified in our strategies. There is an opportunity to consider how the aims of neighbourhoods are not only aligned with the strategies in the Local Plan, but with the wider strategies of the OxLEP area.

The [Strategic Economic Plan](#) (SEP) has recently been refreshed to ensure it focuses on realising the opportunities in Oxfordshire to achieve sustainable development and to conserve its natural resources and built heritage. This provides the 'economic route map' for the county as a whole, built on the four programmes of people, place, enterprise and connectivity.

We support the Watlington NP in the context of the vision and the key objective to "provide development which contributes positively to the environmental, social and economic sustainability of the WNDP area". This is aligned with the SEP's priorities for People, Place, Enterprise and Connectivity:

- **People** – delivering and attracting specialist and flexible skills at all levels, across all sectors, as required by our businesses, filling skills gaps, and seeking to ensure full, inclusive, employment and fulfilling jobs;
- **Place** – ensuring a strong link between jobs and housing growth, and providing a quality environment that supports and sustains growth; and offering the choice of business premises and homes (including more homes that are genuinely affordable) needed to support sustainable growth whilst capitalising on and valuing our exceptional quality of life, vibrant economy and urban and rural communities;
- **Enterprise** – emphasising innovation-led growth, underpinned by the strength of Oxfordshire's research, business collaboration and supply chain potential; recognising and reinforcing the significant contribution made by all sectors, in all parts of Oxfordshire and all types of business;
- **Connectivity** – enabling people, goods and services to move more freely, connect more easily; improving broadband and mobile coverage and capacity; and providing the services, environment and facilities needed by a dynamic, growing and dispersed economy.

