

Called-in Planning Application
at Land between A34 Milton Interchange
to B4017 north of Clifton Hampden.

CASE REF: APP/U3100/V/23/3326625.

REBUTTAL OF APPLICATION'S EVIDENCE
On Strategic Need, Planning Policy & Transport Planning.

1. REBUTTAL OF OCC EVIDENCE OF BERNARD GREEP ON PLANNING.

1.1 I shall refer to the following documents:

- i) Evidence of Bernard Grep, instructed in Oct 2023
- ii) EHPC Statement of Case & Proof of Evidence.
- iii) Adopted Vale Local Plan (VoWHLP) 2016 & SODC Local Plan (SOLP) 2020.
- iv) OCC Cabinet Agenda Oct 2019, listing 12 sites to be “unlocked” by HIF1.
- v) Local Plan Review Dec. 2021
- vi) 2014 Strategic Housing Market Assessment (SHMA)
- vii) Releasing Development Strategy June 2021
- viii) Abandonment of Oxfordshire 2050 dated 2022
- ix) Valley Park Planning Permission, submitted 2014, approved 2022
- x) Vale 5-year Housing Supply Statement Dec 2023
- xi) Vale Annual Monitoring Report 2021/2
- xii) S. Oxfordshire Monitoring Report 2021/2, Mar. 2023.
- xiii) Joint Local Plan 2041 Preferred Options Consultation Jan-Feb 2024
(with Policy map & Policies for strategic & non-strategic sites).
- xiv) Dec 2023 NPPF paragraph 226.

THE NEED FOR INTERVENTION

1.2 He identifies the Context & Need for Intervention in paragraph 2.3.3 & 2.3.4 as:

- i) Lack of river crossing options, constrained rail crossing capacity, & links to A34 that may make the vast majority of allocated sites less attractive, leading to increased congestion, disrupting growth in Didcot, where sustainable travel is encouraged, (para 2.3.3).
- ii) The complexity, scale & cost of the HIF1 scheme has prevented developers from delivering homes on third party land, (para 2.3.4).
- iii) He considers that the adopted plans comply with the NPPF & are up-to-date (para 3.2.7), & that NPPF 11c) applied, allowing permission without delay.
- iv) In response to the EHPC objection, he states that even if the VoWHLP is out of date & NPPF para 11d) part i) applied, the SOLP is up to date & the Green Belt issue only applies in the SOLP, or if NPPF para 11d part ii) applied, the benefits significantly outweigh the adverse impacts, (his para 7.1.5).

THE LACK OF MONITORING

1.3 The planning system relies on Planning, Monitoring & Managing development.

Mr Greeb has not fully monitored Local Plan policies, or the 12 housing sites identified in the Oct 2019 OCC Cabinet report as justifying the HIF1 grant.

1.4 My rebuttal says that weight for decision-making purposes should be given to the Joint Local Plan 2041 Reg. 18 stage consultation on the Preferred Options Plan, which reviews the Didcot transport policies (SP3), the housing (HOU1) & employment (JT1) policies, based on advice in NPPF paragraph 226.

1.5 The Dec 2021 Vale Local Plan Parts 1 & 2 Review concluded that Policies 4, 5 & 4a on the District & Science Vale housing requirements required updating through the Oxfordshire 2050 Plan (abandoned in 2022) & under NPPF para 74, the minimum housing requirement would be 636 dpa using the Standard Method (plus 183dpa for Oxford). The Joint Local Plan will review Policies 1, 2, 3, 6, 7, 8, 12, 13, 14, 15, 16, 17, 18. The change in the plan period, & the change to a Joint Plan, requires a Replacement Plan.

1.6 The Jan 2024 Joint Local Plan Preferred Options Reg. 18 Part 2 stage.

i) It reviews the Settlement Strategy for Didcot, Policy SP3, which:
“will reduce reliance on motorised vehicles & promote a step-change towards active travel & public transport.”

ii) It reviews the housing requirement, using the Standard Method, & under Policy HOU1 proposes:

SODC: 17,050 homes 2021-41, 605 homes per year (reduced by -22%, from 775) plus 4,950 homes to meet Oxford’s needs.

VoWHDC: 14,390 homes 2021-41, 628 homes per year (reduced by 38%, from 1,028) plus 2,200 homes for Oxford’s needs.

The Oxfordshire SHMA forecasts are not considered a sound basis for assessing housing need because they were based on Interim 2011 Population projections only covering the period 2011-2021.

iii) It reviews the employment land requirements, in Policy JT1, reduces from 218 hectares to 113 hectares (-48%) in VoWHDC, & remains at c.26 hectares in SODC.

1.7 Under NPPF para 226, for decision-making purposes, a 4-year housing land supply will be required where there is an emerging Reg. 18 stage Local Plan with a Policy Map & proposed allocations towards meeting housing need. This gives weight to the emerging Local Plan because it can be relied on for decision-making purposes.

1.8 The Releasing Development Strategy June 2021 for both Districts states that there should be No Objection to the development of large housing sites on highway impact grounds, with highway contributions sought. This would prevent a further 3.5 years delay in the delivery of homes & jobs. This reversed a decision in 2018 to object to the development of large sites with off-site infrastructure requirements, which led to speculative development due to the lack of a 5-year land supply.

1.9 It is concluded that the emerging Joint Local Plan/LTCP defers & reduces the Strategic Need for HIF1, gives higher priority to reducing emissions/travel by car, & a step-change in favour of Active Travel/bus/rail/parking controls, than the adopted Plan. The OCC had contributed to the delay in the delivery of homes & jobs between 2016 & 2021, prior to the adoption of the Releasing Development Strategy.

2. The 12 Housing Sites to be unlocked by the HIF1 Scheme. (Source: Oct 2019 OCC Cabinet Agenda)

	SITE	HOMES by 2034	PLANNING STATUS
1	Berensfield	1,700	No application (Masterplan underway)
2	Adj. Culham.	2,100	No application (Masterplan underway)
4	Car park, Station Rd.		Not known
6	Ladygrove East	642	Resolution to permit subject to Sec. 106
7	Didcot A	120	Outline application, Other uses proposed.
10	S. of A4130	166	Completed
12	Vauxhall Barracks	300	MOD Not available until 2034
26	Valley Park	4,254	To be completed by 2034
27	NW of Valley Pk	800	Application refused on highway grounds.
39	E of Sutton C'ney	220	3 applications refused, no highway objection.
41	N of Appleford Rd.		Not known.
	Total	10,302	new homes.

2.1 The Table results do not demonstrate that c.10,000 homes would be unlocked by the HIF1 Scheme.

- i) 3,800 homes at Berensfield & Culham have yet to submit an application.
The main issue at Berensfield is the Golden Balls roundabout.
- ii) 762 homes at Ladygrove & Didcot A have planning permission.
- iii) 5,182 homes S of A4130 & Valley Park are under construction/completed.
The Council took 8 years to determine the application, 2014-2022!
- iv) 1,022 homes NW of Valley Park & E. of Sutton C'ney have been refused.

2.2 **The Transport Assessment for the Valley Park application** uses these trip rates, without measures for a step-change in favour of Active Travel/bus/rail:

AM Peak			PM Peak		
IN	OUT	TOTAL	IN	OUT	TOTAL
Private Housing					
0.141	0.409	0.550	0.373	0.226	0.599
Affordable Housing					
0.139	0.318	0.517	0.353	0.218	0.572

Est. Trip Generation

588	1598	2186	1492	922	2418
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Revised Trip Generation (Rev.6)

518	1173	1691	1280	871	2151
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Est. Trip Distribution

North B4493 3,807 homes

South B4493 643 homes

Mitigating Measures

Improvements to A34 Milton Interchange

Improvements to Rowstock roundabout A4130/A417 & A4130/Colletts.

2.3 Conclusions on the 12 Sites to be unlocked by HIF1.

It is concluded that the Valley Park application for 4,254 homes did not require the completion of the HIF1 scheme, & in the absence of planning applications for Berensfield & Land adjoining Culham Science Centre, it is unclear how these developments were delayed by the absence of the HIF1 scheme.

2.4 Clarity is sought on why the estimated costs of c. £234M have not changed between the OCC Oct. 2019 Cabinet agenda in line with inflation & increased construction costs, (see my Further Appendices) and the OCC Dec.2023 Cabinet agenda, & as to the proportion of section 106 funding would be available for HIF1, as it is largely spent on providing three new schools, and supporting bus services (see my Further Appendices).