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**Susan Halliwell
 Director for Planning & Place**

20 March 2018

By Email Only

Dear Holly

Proposed Development of Chalgrove Airfield

Thank you for your letter dated 27th February 2018 and apologies for the delay in responding. I thought it important to have had the follow-up meetings with Homes England to see if indeed any of the improvement challenges we collectively gave Homes England would be met. We have been encouraged by the “joined up” approach we have taken with the South Oxfordshire District Council on this site, and indeed the whole Local Plan; this will need to continue as to date the response from Homes England has been disappointing.

The County Council response to the Local Plan consultation is concerned with infrastructure strategy in spatial terms and has at all stages sought to secure supporting evidence to all proposals presented through the emerging Plan – a consistent narrative to justify and provide the basis for the infrastructure we are seeking. In terms of the Chalgrove Airfield proposed allocation, the County Council indicated its opposition in our initial response in August 2016. At Second Preferred Options stage and on the basis that new infrastructure as promoted by the developer might be agreed with Homes England to facilitate east-west connectivity, we were able in May 2017 to adopt a more positive position. It is the case however that, at Publication Stage (Regulation 19), sound highway infrastructure evidence to support this allocation remains incomplete. Officers continue to work with District colleagues and the applicant providing pre-application advice for this proposed allocation site.

I am not able to provide you with a definitive list of matters that require resolution such that we might be able to withdraw our objection to the proposed Chalgrove Airfield allocation. There are a myriad of contributing factors to take into account when considering how a strategic proposal fits within an existing and proposed infrastructure framework in spatial terms; it is not simply a case of putting together a list of infrastructure schemes that may help un-lock one individual proposed allocation. You will of course have considered the spatial fit of this allocation and will understand that it presents some considerable challenges in all aspects of infrastructure provision. I can confirm though that there are three major areas of concern that to date, simply have not been addressed:

As stated above, there is no convincing narrative as to how this site fits into the Plan's spatial strategy. We have stressed that this site, without major supporting infrastructure will be quite remote from the main local growth and activity centres it could potentially serve, and will lead to unsustainable impacts – most notably in highway and public transport terms;

The lack of clarity about the need to properly link this site into the Science Vale, has led to a less than satisfactory list of mitigation measures – made worse by a lack of ability or commitment to deliver those elements where third-party land or funding is required;

On the deliverability aspect, as highway authority in particular, this raises major concerns with us about a deficient package of mitigation and potentially no timely provision of even that level of infrastructure; leaving the existing and new populations under-served for the near and long-term future.

There are of course many technical aspects of these major issues which need to be addressed; but I am trying to summarise to make clear that in principle, not just detail, we are unable at present to withdraw our objections. Officers will continue to work closely with District colleagues in relation to both Evaluation of Transport Impacts (ETI) and cumulative impact assessment (CIA) for whatever options it decides to take forward. You state your belief that all testing has been carried out in relation to the direct mitigation proposals presented in relation to the Chalgrove Airfield allocation. It is correct that developer proposed solutions have been included within the ETI. However, as noted in our Regulation 19 response, questions still exist around the suitability/functionality and viability of these proposals; indeed, subsequent to ETI, additional proposals/amendments to transport infrastructure have been tabled by the HE. Further work on these options and consideration of the impact on the wider network/east west corridor is essential. Understanding the ETI work including checking and challenging its assumptions is an important function of the evidence base. Without further scrutiny the County Council cannot give assurances, nor can the developer, over the delivery of the strategic site.

The above backs into your question about the level of detail required to allay our concerns about the impact of Chalgrove allocation in transport terms. The transport mitigation currently proposed in relation to the Chalgrove Airfield development is somewhat more significant than 'traffic management measures'. Currently proposed, are potentially 5 bypasses and multiple interventions elsewhere on our highway network; all of which will have a fundamental impact on the network function and therefore must be tested accordingly. We, as partnering authorities, would prefer not to find ourselves in a position where, later down the line, we are at appeal due to highway related objections to an allocated site. Failing to be confident of the highway mitigation interventions required to facilitate delivery of an allocated site cannot be a sound approach or basis for future development management of subsequent planning applications. Therefore, we consider it quite reasonable and proportionate to seek clarity and confidence now as part of the Plan-making stage.

I'm afraid that I cannot agree that it is usual for the County Council to deliver direct mitigation required to support a strategic site allocation. Strategic infrastructure included within Vale of White Horse LP is required to support housing growth, economic development and to broadly improve the function of both the local and strategic highway network; these significant highway schemes are not required for, or solely tied to any one development site. Oxfordshire County Council as the highway authority plan spatially through the Local Transport Plan. The development of our highway network is founded on sound strategic forward planning and not only upon the needs of individual development sites. To this end, the County Council does not consider it likely that we

will be bringing forward the direct mitigation schemes currently proposed by the development at Chalgrove Airfield and we have no plans for acquiring land required in this respect. The work undertaken for OXIS identifies the existing infrastructure deficit and we are not looking to support new allocations which add to that.

It remains the case that the County Council seeks that Homes England brings forward the offsite direct highway mitigation schemes, both in terms of funding and securing of the land required. This is quite aside from our questions on suitability of mitigation proposed. Homes England's most recent letter of 18th March 2018 lists again highway infrastructure mitigation proposals. This list is little changed from previous iterations and there remains a lack of confidence in Homes England ability to assure delivery of any mitigation. It is also the case that detailed transport modelling has not to date been provided. A key example being modelling of Watlington. Homes England's recent letter notes completion of 400 homes by 2023 and completion of Watlington edge road by this same date. Oxfordshire County Council has not been provided with any evidence, despite persistent requests, to prove how many homes can be occupied at Chalgrove ahead of Watlington Edge Road completion.

We do not wish to be in a position where we need to rely on a planning application and seeking contributions through S106. We note that there are likely to be concerns regarding compliance with CIL regulations.

The County Council has made it clear that it does not believe that there is sufficient development planned around Chalgrove to adequately contribute to the infrastructure requirements of the Airfield development and it is unlikely that it can be reasonably proven that small scale development will be required to contribute proportionally to major highway mitigation schemes remote from their development sites.

Given the above, you will appreciate that our confidence in the ability of Chalgrove Airfield and Homes England to provide suitable highway infrastructure mitigation remains low and to date, we have seen little that improves this situation. Indeed, following our meeting our confidence has quite considerably reduced. May I suggest that absolute clarity is required in relation to what infrastructure Homes England intends to fund, by when and through what legal mechanism. This is information that Homes England must provide and is essential in understanding whether an allocation is viable and deliverable within the plan period. Again, Homes England's most recent letter does not provide said clarity and simply reiterates its previous assertions.

Whilst I don't think that this letter is the correct forum to set out our education requirements, I can confirm that the recommended 10.55ha is required for the 1500 place secondary school. There are on-going discussions with the developer and our education team in this respect and Homes England, together with their design team seem to be including these requirements within their emerging masterplan.

Homes England has not yet provided any further information or data in relation to their wider development aspirations or impact, as requested in the meeting. Neither have they provided, as promised, their viability report.

In conclusion, the County Council will continue to work collaboratively with South Oxfordshire District Council in relation to development of your Local Plan, but remains less than confident that the Chalgrove Airfield development represents a spatially sound, viable and deliverable solution as a strategic allocation. We have consistently reflected that this proposed allocation must demonstrate that it fits within the wider development strategy and that it must provide suitable infrastructure to mitigate its impact. To date, adequate supporting evidence has not yet been provided. We are acutely aware of time constraints surrounding your plan development and will take all reasonable measures to ensure that we provide suitable resource accordingly.

Yours sincerely



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