

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing  
(where relevant)

Lonsdale Estate

Address Line 1

The Old Village Hall

Address Line 2

Kingston Lisle Business Centre

Address Line 3

Kingston Lisle

Postal Town

Post Code

OX12 9QX

Telephone Number

Email Address

### 2. Agent's Details (if applicable)





JPPC

Bagley Croft

Hinksey Hill

Oxford

OX1 5BD

01865 326823

planning@jppc.co.uk

**Sharing your details:** please see page 3

## Part B – Please use a separate sheet for each representation

Name or organisation: Lonsdale Estate

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Development  
policy 7

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The adopted Local Plan part 1 sets out the development strategy for the District, the Part 2 plan has an important role to play in setting the detailed policies to realise the vision. While we note the Plan makes additional housing allocations, and therefore is not reliant on windfall development to provide a district-wide supply the vision for rural settlements does rely on a supply of new homes to maintain their prosperity.

Continues page 4

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expansion of Development Policy 7 to allow beneficial redevelopment in rural settlements as set out in attached submission.

(Continue on page 4 /expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

### Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

### Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Question 5 continued

The supply of homes in these areas will be solely from windfall development. The policies for new homes in rural areas broadly follow those of the previous Local Plan; there should be a reasonable expectation that those sites suitable for development will already have been developed, those which have not progressed will not have for some fundamental reason.

If the necessary supply of windfall sites is to be maintained additional development opportunities should be created if the Part 2 Plan is to soundly deliver the vision set out in the strategic Local Plan Part 1.

In addition to maintaining rural communities Part 1 of the Plan also seeks to enhance the built environment, including heritage assets, and improve the District landscape. We consider the restrictive development policies for rural settlements forfeit an opportunity to achieve these aims.

We attach our previously submitted comments which outline a beneficial policy through minor amendment to Development Policy 7; while these have previously been submitted they do not appear to have benefited from proper consideration. The consultation summary notes policies exist for replacement dwellings in the countryside, or homes for rural workers, however no consideration is offered as to the benefits from redevelopment of unused sites or whether the policies cited will deliver sufficient rural homes to fulfil the Local Plan vision for prosperous and vibrant rural communities.

We believe such a change to be needed if Part 2 of the Plan is to soundly deliver the strategic vision of the adopted Local Plan, particularly that for rural communities. The suggested policy also offers opportunity for enhancement of the landscape and heritage assets in rural areas, a benefit which should not be lightly forfeited.

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

JPPC ref: 6735

Planning Policy  
Vale of White Horse District Council

28<sup>th</sup> April 2017

Via email to:  
planning.policy@whitehorsedc.gov.uk

Dear Sirs

**Local Plan 2031 Part 2 Detailed Policies and Additional Sites:  
Preferred Options March 2017  
Comments on behalf of Lonsdale Estate Kingston Lisle**

We write on behalf of the Lonsdale Estate who own land in the Western Vale sub-area of the Vale of White Horse District. We welcome the opportunity to comment on your emerging Local Plan Part 2 and would be happy to elaborate on any of the issues raised in this submission.

*Introduction*

We are pleased the Council are proactively developing their Local Plan Part 2 following the adoption of Part 1 in December. The adopted Local Plan has been accepted as a sound development strategy for the District by the Examination Inspector, it is therefore important Part 2 provides an effective mechanism to deliver it.

Local Plan Part 1 had a particular focus on the delivery of strategic sites. Although the spatial strategy identified the important role of rural settlements and the need to support their communities no detailed policies were provided to secure this. It is imperative the detailed policies of Local Plan Part 2 effectively provide for the support and enhancement of rural areas including the provision of new homes.

The Local Plan has a delicate balancing act in delivering new homes and supporting the District economy while preserving and enhancing its special character. We believe a positive development strategy for the redevelopment of rural buildings, including farm yards, can make a positive contribution to the realisation of the Local Plan objectives. In particular our suggested approach can contribute to Strategic Objectives 1, to deliver a range of new homes, and 11, to conserve and enhance the Vale's natural, historic, landscape and cultural assets.

### *Delivery of new homes*

The most obvious challenge of the Local Plan is the delivery of a substantial number of new homes. Although the majority of units are to be delivered through site allocations a significant number remain to be delivered through windfall sites.

A minimum of 840 homes are required from windfalls across the District with at least 240 to be provided in the Western Vale sub-area. The Council's land supply is dependent on the provision of these units, consequently the housing policies in the Plan must allow sufficient opportunities for development to meet the housing need.

Present Local Plan policies for unallocated residential development limit opportunities to sites within the built limits of designated towns and villages. These restrictions only provide limited opportunities for new residential development. Furthermore this is a longstanding policy position; the supply of sites fitting the strict parameters is finite, those suitable sites in settlements are likely to have been developed, any remaining sites that have not progressed are likely to suffer some fundamental barrier to development. If the Council are to maintain a supply of homes from windfall sites more permissive residential development policies need to be introduced.

The need for homes and permissive policies is particularly pronounced in rural areas where development opportunities are most limited. It is relevant to note there are a significant number of established settlements in the District below the category of 'Smaller Village'.

They are established conurbations and communities, however the Local Plan classes them as 'open countryside', as a result despite a need for new homes, and opportunities for such development to enhance the area there is no support for positive schemes under the Local Plan.

There is a clear need for homes in such settlements and support in the NPPF and Local Plan Part 1 (discussed below) for their development; furthermore in certain circumstances such developments could enhance their setting. In view of the need for permissive policies to meet the identified housing need we feel housing policies of the plan should be expanded.

### *Supporting a prosperous rural economy*

The NPPF is quite clear in its desire to see rural areas thrive through the maintaining of vibrant communities and businesses. Paragraph 28 of the Framework notes the need to promote the retention and development of local services and community facilities in villages. The same paragraph also sets out support for rural businesses and identifies the opportunities for development through both building conversions and well-designed new buildings.

The Local Plan Part 1 seeks to deliver the NPPF vision for a prosperous rural economy, particularly in the Western Vale area, the most rural part of the District. The Council's vision for the sub-area is for it to "*continue to be an attractive and prosperous rural area*" (page 102).

The Spatial Vision for the District (3.1) contains similar support for development in rural settlements stating: "*The Vale's villages will continue to provide thriving rural communities where appropriate growth has supported local services*". The Plan also

identifies the promotion of thriving rural communities while safeguarding their character as a key strand for sustainable growth (Figure 4.1).

We believe the delivery of new homes in rural areas is fundamental to the maintenance and enhancement of a prosperous rural areas. Present housing policies hinder realisation of the Plan's aspirations, the detailed policies of Part 2 should therefore create opportunities for sustainable development.

*Enhancement of the natural, historic and landscape environment*

The Vale of White Horse District, in particular the Western Vale sub-area is a rural landscape shaped by agriculture. It features a proliferation of small farming settlements, few of which are categorised as 'Villages' within the Local Plan. Several established conurbations are classed as 'open countryside', the same designation in policy terms as if they were entirely undeveloped.

Most rural settlements have developed around farmsteads and farm yards, once the focal point of the village. Commonly these yards feature substantial utilitarian buildings somewhat dominating their built environment.

Changes in farming, particularly the narrowing of profit margins, have seen fewer larger farms. More rigorous food safety, animal welfare and environmental standards now require working farms to have high specification storage facilities for grain and machinery and the rearing of livestock. The net result of this is farms now operate from fewer, larger yards equipped with purpose designed new buildings.

Despite the common terminology referring to large utilitarian structures as 'modern farm buildings' these buildings are often several decades old and no longer meet required standards. With no profitable use such structures commonly fall into disrepair and worsening appearance.

We are aware agricultural buildings are often seen as characteristic of the countryside by Planners and therefore acceptable in the landscape. This view is principally carried forward from the infancy of the planning system and was likely true of obsolete vernacular brick and timber buildings, the same cannot however be said of utilitarian post-war structures. With regard to utilitarian 'modern' agricultural buildings it is more accurate to say their visual intrusion is justified by the broader benefits of an active agricultural use, including contribution to the rural economy and effective management of the landscape. Their presence is justified while in active use, however obsolete structures in poor repair can clearly be deleterious to local amenity. Where beneficial use has ceased and has no realistic prospect of reinstatement, it is in the interests of the environment to see sites restored to good visual condition.

Sensitive residential development of such sites can deliver clear benefits in terms of visual amenity, the setting of historic assets, and the appearance of the landscape. Furthermore such schemes can deliver badly needed new homes, particularly in rural areas, without need for building on greenfield sites

*Suggested development policy*

We note the Draft Local Plan support for re-use of rural buildings (Development Policy 6), this does not however extend to redevelopments. We consider there to be clear benefits to such developments which can play a vital role in realising the Local Plan objectives. We respectfully suggest inclusion of a policy to support the

redevelopment of redundant or disused farm buildings within settlements where the development would respect the existing pattern of development and lead to an enhancement to the immediate setting.

Such an approach would be entirely in line with the aspirations of the NPPF, including paragraph 55 which gives examples, but not an exhaustive list, of circumstances in which new homes can be supported in the countryside.

The policy could assist in delivering new homes, enhancing and maintaining rural communities, facilities and economies while also improving the visual environment. Other amenity policies of the Local Plan would provide suitable safeguards in terms of local amenity and highway safety therefore the Council would retain control against undesirable schemes; the suggested policy would however allow for genuinely beneficial developments which are presently precluded.

In addition to the provision of new homes a suitable policy which allowed the development of small employment sites could support a rural economy and enhance the area. Such developments could be particularly beneficial if delivered in partnership with residential developments providing jobs and homes for rural communities.

#### *Example development*

Westcot is an established settlement within the Western Vale sub-area. The village is presented with challenges common in rural communities including an aging population and an inaccessible housing market, particularly for families and young people. There is a need for new homes to maintain services in the village as well as the population which supports services in the nearby larger settlements.

Although a clearly defined settlement distinct from the surrounding countryside the village is not an identified 'Larger or Smaller Village' within the Local Plan, it therefore falls within the Council's broad definition of 'open countryside'. Present policies would prevent all forms of residential development except building conversions.

The village features a large disused farmyard close to its centre. Westcot farmyard is an example of a yard which while enhanced in the latter part of the twentieth century with substantial buildings it is no longer required for agriculture, nor could it play an active role without substantial new buildings.

The yard constitutes a substantial area of developed land in the village which features prominent and substantial utilitarian buildings. While the land does not fit within the strict NPPF definition of 'previously developed land' in practical terms there is an area which could be developed without the loss of green space or any harm to ecology.

Development of the site could remove large dilapidated structures to the benefit of visual amenity, provide new homes to maintain the vibrant community and potentially offer new facilities such as a recreation area for the village. The acceptability of any development would of course remain to be considered against the detailed policies of the plan, therefore development would only occur if it would not be detrimental.

### *Summary*

In terms of the three strands of sustainable development we believe it would be entirely correct for the Local Plan to include a policy which allowed the beneficial redevelopment of agricultural sites in rural settlements.

Our suggested policy would be beneficial in environmental terms by removing visually intrusive buildings and reducing pressure for development on green fields, in terms of social and economic sustainability it could also support prosperous rural communities and economies.

Creation of new sustainable development opportunities will clearly be beneficial in supporting the supply of windfall sites, something upon which the Council is reliant while the amenity policies of the Plan provide adequate protection for amenity. In view of the numerous benefits we believe the suggested policy should be included and welcome your consideration.

If you have any questions about this submission please do not hesitate to contact me.

Yours faithfully

David Burson LLB (Hons) MSc.  
Senior Planner  
Email: david.burson@jppc.co.uk