



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

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

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.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Stuart	
Last Name	Gibson	
Job Title (where relevant)		
Organisation representing (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Post Code		
Telephone Number		
Email Address		

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

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

Paragraph

Policy

4a

Policies Map

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

4. (1) Legally compliant

Yes

X

No

4. (2) Sound

Yes

No

X

4. (3) Compiles with the Duty to Cooperate

Yes

No

X

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.

Please refer to the accompanying representations document which sets out why we consider the Local Plan is unsound

(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.

Please refer to the accompanying representations document which sets out in detail what modifications we consider necessary to make the Local Plan sound and why.
Core Policy 4a should be amended to include land at The Croft, Milton Heights in the additional site allocations for the South East Vale Sub-Area to provide up to 80 dwellings.

(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:

We wish to raise our concerns

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.**

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Part B – Please use a separate sheet for each representation

Name or organisation:

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

Paragraph

Policy

15a

Policies Map

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Yes

No

4. (2) Sound

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Core Policy 15a should be amended to include land at The Croft, Milton Heights in the additional site allocations for the South East Vale Sub-Area to provide up to 80 dwellings.

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Signature:

Date:

22/11/2017

Sharing your personal details

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**Land at The Crofts (MIHE01), Milton Heights
Representations to the Vale of White Horse Local
Plan 2031 (Part 2: Detailed Policies and Additional
Sites)**

November 2017

1.0

Introduction

1.1

These representations have been prepared on behalf of the landowners in relation to land at The Crofts (MIHE01), Milton Heights. The representations respond to the Vale of White Horse (VoWH) Publication Version of The Local Plan 2031 Part 2: Detailed Policies and Additional Sites.

1.2

The site was considered by VoWH (as part of a larger site) in their preparation of the Preferred Options Version of the "Part 2 Local Plan" (March 2017). VoWH recognised that development in this location would be a logical infill, however, the site was not recommended for allocation in the Local Plan. In essence the reason that VoWH did not allocate the wider site, for up to 1,500 dwellings, was traffic issues.

1.3

In summary, these representations highlight a number of concerns with the emerging Local Plan strategy, which bring the prospect of the plan being found "sound" into doubt. The concerns are shown below and expanded upon within these representations:

- 1 The housing supply proposed in the Part 2 Local Plan is considered to be over reliant on strategic development sites, with doubts about their sustainability and potential delivery constraints. This highlights the importance of the plan providing smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period.
- 2 There is no agreed comprehensive county-wide strategy to meet unmet housing need of Oxford City as the South Oxfordshire District Council (SODC) did not agree to sign the Memorandum of Co-operation; therefore there is a shortfall of 1,200 dwellings which may be required to be accommodated within VOWH in addition to the 2,200 additional dwellings currently planned for.

1.4

These representations go on to summaries the suitability of the site at land at the Crofts for further residential development.

2.0 Housing Need and Strategy

- 2.1 The VoWH Local Plan 2031: Part 1 (December 2016) covers a plan period from 2011 to 2031 and proposes the delivery of 20,560 homes over this time, which equates to 1,028 dwellings per annum (dpa). This addresses the housing need originating within the VoWH.
- 2.2 The Part 2 Local Plan seeks to address unmet need originating in Oxford City. This part of the plan increases the overall housing requirement to 22,760 dwellings during the same plan period. This results in an increase in the number of dwellings required per annum to 1,138dpa.
- 2.3 The process for the surrounding authorities to assist in meeting this unmet need is currently being resolved through the Oxfordshire Growth Board (OGB). The OGB and surrounding districts have agreed a working assumption that to meet Oxford's unmet housing need, 15,000 homes will need to be accommodated outside Oxford in the period to 2031. A report was taken to the OGB meeting of the 26th September 2016 which set out a recommended apportionment of the unmet housing need of Oxford which included the need for the VoWH to accommodate 2,200 dwellings.
- 2.4 At the meeting all of the Local Authorities agreed to the level of unmet need apportionment, and agreed to sign the Memorandum of Cooperation except for South Oxfordshire District Council (SODC). As a result South Oxfordshire Local Plan 2033: Final Publication Version (October 2017) only proposes to provide 3,750 dwellings of Oxford's unmet need – a shortfall of 1,200 dwellings compared to the expected 4,950 dwellings as part of the OGB process. This shortfall is not being addressed by any of the other Oxfordshire Authorities.
- 2.5 As a result, Oxford City's unmet need is not met in full and VoWH and other authorities surrounding Oxfordshire may therefore need to make a higher level of housing provision to meet this need as the Duty to Cooperate has not been complied with in full.

Boosting the Supply of Housing

- 2.1 The NPPF (para 47) requires Councils *“to boost significantly the supply of housing”* and *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for housing.”* These representations set out concerns in relation to the housing need that the Part 2 Local Plan seeks to address.
- 2.2 The NPPF goes on to require local planning authorities to :
- 1 use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; and
 - 2 identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land (increasing to 20 % where there has been a record of persistent under delivery of housing
- 2.3 The NPPF (footnote 11) clarifies that *“to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.”*

Recent Housing Delivery

- 2.4 The most recent analysis of housing delivery within the VoWH is within their publication - Five Year Housing Land Supply Statement 2017/18-2021/22 (April 2017). This identifies:
-

- 1 Housing delivery in the Ring Fence area in the period 2011/12 to 2016/17, at 1497 (i.e. 299 dwellings per annum) represented under deliver of 2,061 dwellings over this six year period (table 2);
 - 2 Housing delivery in the District in the period 2011/12 to 2016/17, at 4,680 (i.e. 780 dwellings per annum) represented under deliver of 1,488 dwellings over this six year period (table 2);
 - 3 The analysis to date does not include “*unmet need*” from Oxford City (para 3.3);
 - 4 The Council acknowledge their has previously been under delivery of housing and thus a 20% buffer has been applied to future 5 year land supply analyses (para 3.12); and
 - 5 Forecast housing delivery is such that VoWH contend that they are able to demonstrate a 5.7 year housing land supply in the Science Vale Ring Fence area and a 6.7 year housing land supply throughout the whole District (table 5).
- 2.5 The resultant delivery rate in recent years of 299 and 480 dwellings per year, in the ring fenced area and district as a whole respectively, is far lower than both the Part 1 and Part 2 Local Plan requirements for future years and emphasises the necessity of the emerging Local Plan to establish a realistic and robust housing delivery strategy.
- 2.6 This is reiterated in the recent appeal decision, Appeal Ref: APP/V3120/W/16/3145234 Mather House & Greensands, East Hendred, which the Inspector concluded that the housing supply in the Science Vale Ring Fenced Area was between four and five years and allowed the appeal (May 2017).

Strategic Allocations

- 2.7 Notwithstanding the above it is clear that Parts 1 and 2 of the Local Plan are heavily dependent on a few large scale strategic sites. These include the following four sites within Part 2 of the Local Plan which accounts for 3,200 dwellings:
- Dalton Barracks (1,200 dwellings)
 - Harwell Campus (1,000)
 - East of Kingston Bagpuize with Southmoor (600 dwellings)
 - North West of Grove (400 dwellings)

Forecast Housing Delivery

- 2.8 As noted above, recent housing delivery in VoWH, prior to the need to address unmet need from Oxford City is characterised by acknowledged “*under delivery.*” This increases the importance of a realistic supply of deliverable sites within the forthcoming five year period.
- 2.9 There are some concerns that some of the Part 1 Local Plan strategic allocations are already delayed and will not meet the expected delivery rate stated within the most recent five year land supply position.
- 2.10 Beyond the Part 1 allocations, having reviewed the Part 2 Local Plan proposals for housing delivery, there are also concerns that the new strategic allocations identified above, rely too heavily on the delivery of a few large scale sites. Large scale sites are not always easy to kick start due to their scale, complexity and (in some cases) up front infrastructure costs. Further to this, once up and running, there is a need to be realistic about how quickly they can deliver new homes.
- 2.11 The average lead in time for large sites prior to the submission of the first planning application is 3.9 years¹ and the greater the number of homes, the longer the planning approval period becomes. Further

¹ Lichfields Start to Finish (November 2016) (Survey of 70 Large Housing Sites and 83 Small Housing Sites)

to this, large sites are typically not quick to deliver. The average annual delivery on strategic sites of 1,000 to 1,499 units barely exceeds 100 units per annum² once construction has commenced.

- 2.12 In addition, our preliminary analysis has identified concerns regarding one of the main allocations within the Part 2 Local Plan.

Harwell Campus

- 2.13 Harwell Campus is seeking to deliver 1,000 dwellings by 2031, a substantial proportion of the new housing allocations in the Part 2 Local Plan.
- 2.14 The Part 2 Local Plan (draft Core Policy 15b) states that all new development at Harwell Campus will be guided by a comprehensive development framework (published as a Supplementary Planning Document) to ensure it meets the transport and landscape requirements and becomes an exemplar Innovation Village. The preparation and adoption of the Framework for the site will take time and therefore housing on the site is unlikely to come forward in the short to medium term and may not even come forward fully during this plan period (up to 2031).
- 2.15 In addition, this site was removed from the Part 1 plan due to being located within the North Wessex Downs Area of Outstanding Natural Beauty. It is considered that there are plenty of other sustainable options which *“help to achieve and maintain a sustainable balance of housing and employment within the Science Vale area....which are located close to the provision of new jobs and are accessible by sustainable modes of travel”*. The proposed site at The Crofts, Milton Heights (MIHE01) would be one of those sites that is not constrained by the AONB and would help accelerate the housing delivery within the Oxfordshire Knowledge Spine growth corridor.

Conclusion

- 2.16 VoWH has recently experienced under-delivery of housing supply even prior to the increased housing target that the Part 2 Local Plan seeks to progress.
- 2.17 These recent and potential future delivery concerns are likely to continue, as the housing supply identified within the Part 2 Local Plan is over reliant on strategic development sites which require a lot of upfront work, even before development starts on site.
- 2.18 This highlights the importance of the Local Plan Part 2 providing a range of smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period.
- 2.19 One such site, within a sustainable location, is land at The Crofts (MIHE01) which is assessed in more detail below.

² Ibid

3.0 The Site

- 3.1 The site is located in the village of Milton Heights which is considered to be a smaller village but with facilities of a larger village (as confirmed in Local Plan Part 1). Milton Heights is considered to be a sustainable location for development, as demonstrated by the Local Plan Part 1 housing allocation which neighbours the proposed site.
- 3.2 The site is currently a mix of residential and greenfield land, and is enclosed by hedgerows. There are no Sites of Special Scientific Interest, Special Areas of Conservation, National Nature Reserves or Conservation Target Areas within close proximity.
- 3.3 The site is located in an accessible location with a number of key local facilities catering for daily needs within an acceptable walking distance. For instance Milton Heights contains a range of services including a pub, a convenience store, a community primary school, a nursery, a Church and a number of employment opportunities within walking distance.
- 3.4 There are also a number of walking and cycling links available in the area and it is within close proximity to local bus stops on the Abingdon Road which are served by a frequent bus service connecting the site to major employment areas such as Milton Park in addition to Oxford, Abingdon and Didcot Parkway station.
- 3.5 Vehicle access to the site can be located off the Abingdon Road (A413) or Potash Lane which is also serving the recently approved strategic allocation. Either of these will connect the site directly to the local highway and onwards to the strategic road network. The site is therefore an accessible and sustainable location.

Potential for Residential Development

- 3.6 The site was identified within the recent Housing and Economic Land Availability Assessment (HELAA) as MIHE01. At 3.25ha, the proforma identifies the site as being suitable for further consideration, available and achievable. The indicative trajectory suggests 81 dwellings could be delivered on the site in the 0-5 year period.
- 3.7 The accompanying proforma to the HELAA highlights that the site is relatively unconstrained as it is not in the Green Belt or an AONB; not in a Flood Zone; not affecting any local, national or international ecological designations; not in the vicinity of any heritage assets and there is an existing access to the site.
- 3.8 The site was then reviewed in more detail as part of a wider site (Stage 4) at Milton Heights for up to 1,500 dwellings (MIHE_A); see Appendix B of the Site Selection Topic Paper.
- 3.9 Stage 4 involved detailed evidence testing, informal consultation and sustainability appraisals. The wider site was discounted at this stage and was not proposed for allocation. The conclusion in the Local Plan Part 2 Preferred Options Publication (March 2017):
- “There are landscape sensitivities which restrict development for the majority of the eastern parcel of land. Further development at Milton Heights would likely result in a significant adverse impact on the immediate local and strategic road network. Both Highways England and the Highways Authority object to any increased development at this site unless significant additional mitigation could be provided.”*
- 3.10 The conclusion in the Local Plan Part 2 Publication Version was as follows:
- “The site was promoted for different scales of development through the Preferred Options consultation. While there is capacity for some development on site, the existing transport network in the immediate vicinity of the site is significantly constrained and is unlikely to cope with any scale of development in this location”*
-

Response to this analysis

- 3.11 The proposed site at MIHE01 (part of the wider (MIHE_A site) has since had interest from a number of housebuilders which is leading to additional assessments to be undertaken and scheme design formulated, in order to submit a planning application. A summary of responses to the analysis previously undertaken by VoWH are shown below:
- a The proposed site is not located within a landscape sensitive area compared to parts of the wider MIHE_A assessed site;
 - b The site is not constrained by flood risk, ecology or the historic environment;
 - c A primary school is located within walking distance of the site;
 - d The proposed site is well positioned to promote sustainable trips to and from the site, due to its proximity to a number of bus stops within 300 metres of the site, as well as a number of local facilities and well established walking and cycling routes within the vicinity;
 - e Existing residential developments are located on the site which is not currently affected by road noise;
 - f As stated above, there is capacity for some development within the MIHE_A area which would suggest that the proposed development site would be acceptable;
 - g The Chilton slip roads have recently been completed, alongside the works to the Milton Interchange. This has significantly reduced the traffic previous seen at the Milton Interchange junction on the A34. It is therefore considered that, subject to detailed assessments, the potential delivery of up to 80 dwellings should not have a severe impact on the local highway network; and,
 - h There is no reason in terms of transport and highways as to why this smaller site should not be promoted for a residential allocation at this stage. The site benefits from a choice of modes of transport, including high frequency express bus services to key settlements and employment areas, as well as safeguarded infrastructure improvements including a new cycle and pedestrian bridge around the Milton Interchange. The site is located in a key position to encourage sustainable modes of transport and a modal shift away from reliance on the private car.

Concluding Remarks

- 3.12 Land at The Crofts (MIHE01) forms a sustainable location and the site is well located within Milton Heights, a smaller village with facilities of a larger village. Earlier analysis by VoWH highlighted the suitability, availability and deliverability of the site, subject to addressing potential wider highway constraints (albeit more pertinent for the wider MIHE_A site of 1,500 dwellings).
- 3.13 The subsequent review considers that these matters are all capable of resolution and appropriate development of up to 80 dwellings is capable of being brought forward for development. Furthermore the site is capable of coming forward for residential development within the next 5 years.
- 3.14 The site is therefore in an ideal location to contribute to meeting the short to medium term housing need within the South East Vale Area of the Vale of White Horse, a priority area for housing (Core Policy 4) and a sustainable village, as stated in Part 1 of the plan as well as by Paragraph 2.94 of the draft Local Plan Part 2.
- 3.15 This site will help to achieve and maintain a sustainable balance of housing and employment within the Science Vale area by ensuring that housing is located in close proximity to the provision of new jobs and is accessible by sustainable modes of transport (Para 2.96 point 1). In addition, it will also help meet Oxford's unmet need. The site should therefore be allocated for residential development in the Part 2 Local Plan.
-

4.0 Conclusions

- 4.1 There are concerns over the emerging plan and the evidence and analysis underpinning it, which could lead to the Vale of White Horse Local Plan: Part 2 being considered unsound at examination.
- 4.2 These concerns focus on the fact that the emerging plan is over reliant on larger strategic allocations to provide sufficient housing land to meet Vale of White Horse District's need; especially in light of the under delivery over the last 6 years and the latest appeal decision on the housing land supply within the Science Vale Ring Fenced Area.
- 4.3 In addition, there is a shortfall of 1,200 dwellings within Oxfordshire which is not being met by any of the authorities. Therefore the housing need within VoWH may need to increase further if the full apportionment of unmet need of Oxford City Council is not met by South Oxfordshire District Council.
- 4.4 It is considered that the land located in Milton Heights should be allocated in the Part 2 Local Plan to seek to ensure the full housing requirement for the Vale of White Horse District is delivered within the Plan period.
- 4.5 The land at The Crofts, Milton Heights was only discounted at Stage 4 of the Council's site assessment and we consider that the additional information provided confirms that the concerns previously identified are capable of being overcome on this smaller development parcel.
- 4.6 It is evident from the Council's previous analysis and the additional review within this representation that the site presents an ideal location to contribute to housing growth given its proximity to existing services and good transport connections. The site should therefore be allocated as a new residential allocation in the Part 2 Local Plan.

Change Sought to the Local Plan Part 2

- 1 The site should be added to Core Policies 4a and 15a as an additional allocation of up to 80 dwellings.
-