

Vale of White Horse District Local Plan 2031

Representations by Welbeck Strategic Land

Core Policy 3

Welbeck Strategic Land LLP general support the spatial distribution and settlement hierarchy, specifically the identification of Faringdon as a Market Town within the Western Vale Sub Area.

Core Policy 4

Welbeck Strategic Land LLP support the principle of the land south of Faringdon, as identified in the Appendix to the Local Plan, being allocated for residential purposes (known in some documents as Site 19 or Land South of Faringdon within Great Coxwell Parish). The land is already the subject of an outline planning application for the erection of up to 200 dwellings.

Core Policy 6

Welbeck Strategic Land LLP support the principle of the provision of employment land south of Park Road, Faringdon and the retention of the existing employment allocations to the north of Park Road and adjacent to the A420.

Core Policy 7

Welbeck Strategic Land LLP general support the principle of a viability led approach and the prioritisation of essential infrastructure over place shaping infrastructure. However, Welbeck is somewhat concerned by the suggestion that there will be a Supplementary Planning Document for Section 106 and Section 278 legal agreements. The National Planning Practice Guidance is clear that:

Policies for seeking obligations should be set out in a development plan document to enable fair and open testing of the policy at examination. Supplementary planning documents should not be used to add unnecessarily to the financial burdens on development and should not be used to set rates or charges which

have not been established through development plan policy (Paragraph: 003
Reference ID: 23b-003-20140306)

There should be not additional planning policy document prepared which is indented to addresses Section 106 or Section 278 matters.

Welbeck has considered the content of the content of the *Local Plan Viability Study*, the *Infrastructure Delivery Plan* and the *CIL Viability Study* which form part of the evidence base of the emerging Local Plan. Welbeck does have queries and questions concerning some of the assumptions which underpin the costing and analysis contained in these documents but these matters can be discussed as part of the consideration of a planning application and the viability led approach included in this policy.

Core Policy 20

Welbeck Strategic Land LLP generally support the Western Vale Sub Area policies, including the settlement hierarchy and the identification of Faringdon as a Market Town.

Welbeck support the principle of the land south of Faringdon, as identified in Appendix A, being allocated for residential purposes (known in some documents as Site 19 or Land South of Faringdon within Great Coxwell Parish). The land is already the subject of an outline planning application for the erection of up to 200 dwellings.

Core Policy 21

Welbeck Strategic Land LLP notes this policy seeks to safeguarded land to support the delivery of the transport schemes, specifically junction enhancement on the A420 at Faringdon and Shrivenham. One of these areas of safeguarded land is adjacent to the junction of Coxwell Road and the A420.

Welbeck support the principle of such safeguarded land but this policy should go further by referring to such junction improvements forming an integral part of the wider transport strategy for the Western Vale Sub Area. The junction improvements are not necessarily required because of a single development within the Western Vale Sub Area. Instead, as noted in the supporting evidence base, in particular the *Evaluation of Transport Impact Study*, it is the cumulative effects of both natural traffic growth and traffic generated by

developments both within and adjacent to the Western Vale Sub Area which necessitate the requirement for the junction improvements at Faringdon.

Without the need to undertake detailed design works, an indication of the junction improvements proposed should also be included in this policy. For example, at the junction of Coxwell Road and A420 such a comment could refer to either the widening of the existing junction, the construction of a new roundabout or the erection of traffic lights.

Because of the likelihood of the Community Infrastructure Levy providing some or all of the funding towards junction improvements at Faringdon (or pooled funding from several sources via a Planning Obligations in advance of the Levy being adopted) and by reason of the wider transport benefits which will be secured along the A420, it would also be prudent in the policy to identify that the works would be promoted by the Highway Authority. In short, it should be the Highway Authority which benefits from being able to utilise the safeguarded land for the junction improvements.

Appendix A

Welbeck Strategic Land LLP supports the allocation of around 200 dwelling on land to the west of Coxwell Road located to the south of Faringdon. Welbeck confirm that, based upon the general content of the evidence base and provision of not more than 35% affordable housing, the 200 dwellings or so can be delivered. Clearly, more detailed viability assessment work is required as part of any planning application and the outcome would be the subject of the requirements of Core Policy 21.

However, some amendments to the general requirements identified in Appendix A are required for reasons of clarity.

- The first urban design principle refers to '*existing and planned facilities and services on site*'. However, there are no on-site facilities or services identified in the remainder of the Appendix A nor in the relevant policies except for open space. Accordingly, the on-site linkages can only be to open space and this should be specifically referred to in the policy.
- Reference to a major upgrade of A420/Great Coxwell Road junction is noted. However, for the reasons provided in the representation concerning Core Policy 21, these works should be the subject of a financial contribution to fund the improvements proposed which ought to be delivered by the Highway Authority. As

has been demonstrated in a *Cumulative Traffic Impact Assessment* for the current residential applications at Faringdon, a 'major upgrade' to this junction is not required solely as a consequence of either this proposed allocation or in combination with the development proposal east of Coxwell Road. Instead, based upon detailed traffic modelling, a widening of the existing junction is technically feasible and acceptable.

- The delivery of 'adequate pedestrian and cycle links from Fernham Road to Coxwell Road' involves land outside the proposed allocation. This land is situated to the east of Coxwell Road is the subject of a current planning application. The onus should be on that developer of this neighbouring site to provide these links between these 2 roads.
- It is unclear why, when the proposed allocation is such a distance away from the A420, there is any requirement to consider noise and air quality impacts from this road.
- The land is and has been in agricultural use and is devoid of any built development. Accordingly, it is unclear what contamination risk exists.
- A landscape buffer would not necessarily prevent the coalescence of Faringdon and Great Coxwell. Instead, it is the location of the about 200 dwellings which is of key importance to this requirement. A landscaping buffer is more appropriate for assimilating development into the area and enhancing the existing hedges and hedgerow trees.

As a matter of principle, any financial contributions or improvements associated with the proposed allocation would be required to meet the statutory tests identified in the *Community Infrastructure Levy Regulations 2010* and the guidance in the *National Planning Practice Guidance*. Such contributions would also be applicable to addressing the identified Green infrastructure deficit in the area surrounding Faringdon.

Version Final
18 December 2014