



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	MS	
First Name	P	
Last Name	Dothie	
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

2.101-
2.118

Policy

15b

Policies Map

Fig 2.6

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.

I object to the VWHDC's proposals to build 1,000 dwellings in the legally protected landscape of the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB); an almost identical proposal to one that was deleted from the Local Plan Part 1 by Planning Inspector Malcolm Rivett.

Changes required to the Local Plan Part 2

In order to make the Local Plan Part 2 sound, the Vale will have to delete the 1,000 dwelling site in the AONB as per the recommendation by Planning Inspector Malcolm Rivett during the EiP of the Local Plan Part 1.

Objectively assessed housing needs already met in Local Plan Part 1

The Vale of White Horse confirms that it has already fully met its objectively assessed need for housing, and aims to meet Oxford's unmet need (highlighting added):

*"The Part 1 plan allocates 'strategic' development sites to **fully meet** the Vale's own housing requirement up to 2031 (20,560 homes).*

*This chapter sets out the 'additional' housing allocations needed to ensure the agreed quantum of **unmet housing for Oxford** to be addressed within the Vale is also **fully met**. This requirement, as agreed by the Oxfordshire Growth Board, is for 2,200 homes to be delivered within the same period*

up to 2031, subject to the plan making process.”

However, the Vale has decided to allocate a further 1,400 dwellings in the Science Vale area, despite the fact that sufficient dwellings have already been allocated over the plan period for ALL of the identified housing needs:

*“The Part 2 plan also allocates **some ‘additional’** sites to deliver 1,400 homes within the Science Vale area to provide continuing support for economic growth in accordance with the Oxfordshire Strategic Economic Plan, to support the delivery of strategic infrastructure and provide a bespoke mix of housing and tenures tailored towards the needs of key employers in this area.”*

SOURCE:

<http://www.whitehorsedc.gov.uk/sites/default/files/Draft%20Local%20Plan%202031%20Part%202%20-%20Detailed%20Policies%20and%20Additional%20Sites.pdf>

Clearly, the 1,400 houses that the Vale is proposing in the Science Vale area are **in addition** to the objectively assessed need and Oxford’s unmet met. Therefore, the actual need for these additional homes has not been consulted on, and has not previously been identified as being “needed” during the Local Plan Part 1 or as part of the SHMA as a whole. Furthermore, no true justification or details on why the Vale decided that the number of “1,400” homes should be added in addition to the objectively assessed need has been supplied. Given that 1,000 of these homes are proposed in an Area of Outstanding Natural Beauty, I find the basis of the figure unsound; scrutiny of these numbers is required.

With regards to deleting the sites from the AONB in the Local Plan Part 1, the Planning Inspector (in his interim findings) confirms that this would have no negative impact on the five year housing land supply, and that sufficient dwellings would be met across the district over the plan period:

*“9.12 I conclude that modification of the plan to delete sites 12 and 13 is thus necessary. As detailed in section 13, **even without these sites the plan would provide for a five year supply of deliverable housing land, and sufficient dwellings district-wide for the plan period as a whole.** However, it would reduce the potential supply of housing in the South East Vale and the Council may wish to consider the need to allocate replacement sites in this area through the Part 2 plan. However, there would be little reason to delay adoption of the Part 1 plan by seeking to allocate replacement sites at this stage.”*

Given that there are sufficient dwellings district-wide over the plan period, what justification does the Vale have for proposing a 1,000 dwelling site in the NWD AONB? The Planning Inspector only suggest that the Council **“may”** wish to consider the need to allocate replacement sites; he does not say that additional houses “must” be allocated in the South East Vale.

Housing allocation in AONB to meet wider Science Vale

The proposed 1000 dwelling allocation in the NWD AONB aims to meet three needs:

- Housing for Campus Employees
- Housing for the wider Science Vale
- Open Market Housing

The only aim that might realistically comply with the NPPF paragraphs 115/116 is for providing "housing for campus employees". Providing housing for the "wider science vale" and "open market housing" does not comply with the spirit of the NPPF paragraphs 115/116 in this regard, making the proposal unsound.

There is no justifiable reason to allocate large numbers of houses in the AONB to support the "wider science vale" given (a) the AONB status of the site and (b) that the Harwell Campus is at the southernmost tip of the science vale and therefore is not well positioned for housing to support the "wider science vale".

(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.

Number of additional dwellings proposed for South East Vale in Local Plan Part 2 by Local Plan Part 1

During the Local Plan Part 1, the Vale published documents confirming that the housing allocation could be met in full even with the deletion of the proposed sites in the AONB. In fact, as recently as December 2016, the Vale published tables indicating that they only need to allocate a further **56 dwellings** in the South-East Vale during Part 2 of the Local Plan; the table presented in the "Local Plan Part 2" looks substantially different, with an additional, unjustified 1,400 dwellings added to the proposed allocations.

SOURCE:

http://www.whitehorsedc.gov.uk/sites/default/files/8.%202016_12_14-%20Chapter%205%20SEvale.pdf

"Housing Delivery At least 12,450 new homes will be delivered in the plan period between 2011 and 2031. 9,055 dwellings will be delivered through strategic allocations. 416 dwellings remain to be identified and will be allocated through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management Process. The contribution of all sources of housing for this Sub-Area are shown by the following table:

Category		Number of Dwellings
Housing requirement for the full plan period (Apr 2011 to Mar 2031)		12,450 ^a
Housing Completions (Apr 2011 to Mar 2016)		1,031
Housing Supply (Apr 2016 to Mar 2031)	Known Commitments	1,725
	Local Plan 2031 Part 1 allocations	9,055
	Local Plan 2031 Part 2 allocations	56 ^b
	Windfalls	360

*a This target addresses needs arising in the Vale of White Horse. If or when required, needs arising elsewhere in the Housing Market Area, will be addressed in accordance with Core Policy 2. b The Local Plan Part 2 allocation identified in the above table will be reduced where dwellings are allocated in Neighbourhood Development Plans or come forward through the Development Management Process. **Housing Supply Ring Fence 11,850 new homes are 'ring-fenced' for the purposes of the assessment of housing land supply within this Sub-Area in accordance with Core Policy 5.** Development will be supported at the strategic site allocations through a masterplanning process involving the community, local planning authority, developer and other stakeholders where development meets the requirements set out within the Site Development Templates shown by Appendix A and are in accordance with the Development Plan taken as a whole. Design, delivery and implementation detail will also be set out in the Local Plan 2031 Part 2. The following table shows how the level of housing required within this Sub-Area through the strategic development sites will be distributed:"*

Settlement/ Parish	Settlement Type	Site Name	Number of Dwellings
Wantage	Market Town	Crab Hill (North East Wantage and South East Grove)	1,500
Grove	Local Service Centre	Monks Farm (North Grove)	885
		Grove Airfield ^{c, d}	2,500
Harwell and Milton parishes, east of the A34 adjoining Didcot town	Adjoining Didcot Town	Valley Park ^e	2,550
		North West Valley Park	800
Milton parish west of the A34	Larger Village	Milton Heights (Smaller Village)	400
Harwell		West of Harwell	200
Sutton Courtenay		East of Sutton Courtenay	220
Total			9,055

The table above was published by the Vale to show how the housing supply in the South East Vale would be met. However, the Vale need to provide an updated table as it does not include, for example, the fact that planning permission has been granted for ~400 dwellings at the Didcot A site.

No exceptional circumstances to build additional, unjustified 1,000 dwelling site in NWD AONB

The Inspector addressed the question of the evolution of the campus itself into a work-live-play community, noting **that no convincing evidence had been presented to indicate that any existing or new employers at Harwell would in the future not be equally successful in attracting people to work there.** This would be as long as there is sufficient, suitable housing within the Science Vale area generally. Submissions to the EiP did suggest that there may be a need for campus-based university-style accommodation such as that described in the Oxfordshire Strategic Economic Plan (SEP). The latter refers to the development of a Research Village at the campus to create the "...feeling of a campus-based university with 5 accommodation blocks (each with up to 40 bedrooms with shared kitchen facilities on each floor and 5 self-contained apartments for those visiting for longer periods)....". This is very different from the **c.1,000 dwellings** proposed in the Part 2 plan and no evidence is presented to overcome the Inspector's statement.

Again, the arguments presented in Para 2.98 repeat the arguments that were made in Part 1 (which were rejected by the inspector), and concludes:

"The Campus is compiling a suite of further evidence to demonstrate the need for and 'exceptional circumstances' for delivering residential development at Harwell Campus. This will be published at the next stage of preparing the Local Plan."

It is not acceptable to provide evidence to demonstrate the need for and “exceptional circumstances” retrospectively.

As part of the second consultation on the Local Plan Part 2, an “Exceptional Circumstances” report was finally published: (http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=789122268&CODE=8E40D144A7918000E5703300DCA091F8).

Unfortunately, whilst stating throughout the document that there are “exceptional circumstances”, there is little evidence or detail on what these circumstances are.

The report confirms that:

- *“Some of these surveys, notably those of employers, are relatively small-scale”,* meaning that any extrapolation of their result should be treated with utmost caution (especially if one knows anything about statistics).
- *“recruitment is difficult”;* that is not unique to the Harwell Campus; it is exactly the same for any employer across Oxfordshire who face exactly the same challenges regarding high house prices when looking to recruit.
- The case studies reported also confirm that *“The Campus suffers from a lack of facilities such as shops and cafés – “you can’t just nip out and buy something at lunchtime”. The Campus was livelier 20 years ago, and it lost its only bank branch last year.”* Meaning that the Campus would have to be developed into a fully functional village in order to bring people the lifestyles that they are looking for from a home. This is not compatible with an employment site, and would result in the “back-door” creation of an extended settlement in the AONB.
- Despite more affordable accommodation in Wantage and Didcot, many students (as is my own personal experience too) actually choose to live in Oxford *“Public transport links to Oxford, where many of the students live, are not especially good. The recent introduction of a privately-run shuttle bus to Oxford University has proved a great success”.*
- Peoples’ choice on where they live, rather than work, includes many factors such as access to leisure pursuits (e.g. history, arts, museums, parks, schools, shopping, cinema, bowling,...etc). It is not accurate to simply assume one would ever choose to live adjacent to work without taking other lifestyle factors into consideration.

For me, there is no sufficient evidence to support 1,000 houses to support workers across the Science Vale.

Housing Density on the Harwell Campus Site

The VWHDC argued strongly during the Local Plan Part 1 that housing density at the Harwell Campus should be “low density” so that any development could be sufficiently screened and with least harm to the AONB setting.

Now, during Part 2 of the Plan, they are taking a completely different approach, and are now stating that extremely high density housing (which is essentially too ugly and too out of keeping with the housing design of neighbouring villages) is acceptable next to an industrial site and within an AONB.

These statements are clearly contradictory, and indicates that there is no clear consensus on development at the Harwell Campus.

Saved policies from the Local Plan to 2011

The current proposals for developing a 1,000 dwelling site in the NWD AONB directly contradicts saved policy E13 from the Local Plan to 2011:

*"11.63 A range of ancillary services and facilities has been provided to meet the needs of employees on and visitors to the campus, including day-care facilities for young children, a squash club and other health facilities, shops, banking facilities and a caf . Policy E13 allows ancillary facilities on key employment sites, including the Harwell Science and Innovation Campus, provided the proposals are small-scale and designed to provide for employees on the site and **not to attract users from a wider area.**"*

SOURCE:

<http://www.whitehorsedc.gov.uk/sites/default/files/Ch%2011%20Economy.pdf>

(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.**



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

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