

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Brian"/>	<input type="text"/>
Last Name	<input type="text" value="Morris"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
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Email Address	<input type="text"/>	<input type="text"/>

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

No

☒

4. (2) Sound

Yes

No

☒

4. (3) Complies 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.

See details in accompanying submission

(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.

Revise the Policy so that a smaller allocation meets solely and specifically the on-site housing requirements of Campus employers for their staff/visitors. As open market and housing association-managed tenure models cannot attain this objective, such provision should be made under the continuing control of the Campus.

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Brian Morris

Date:

18 Nov.2017

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Q5- see text below

Representation on Core Policy 4a

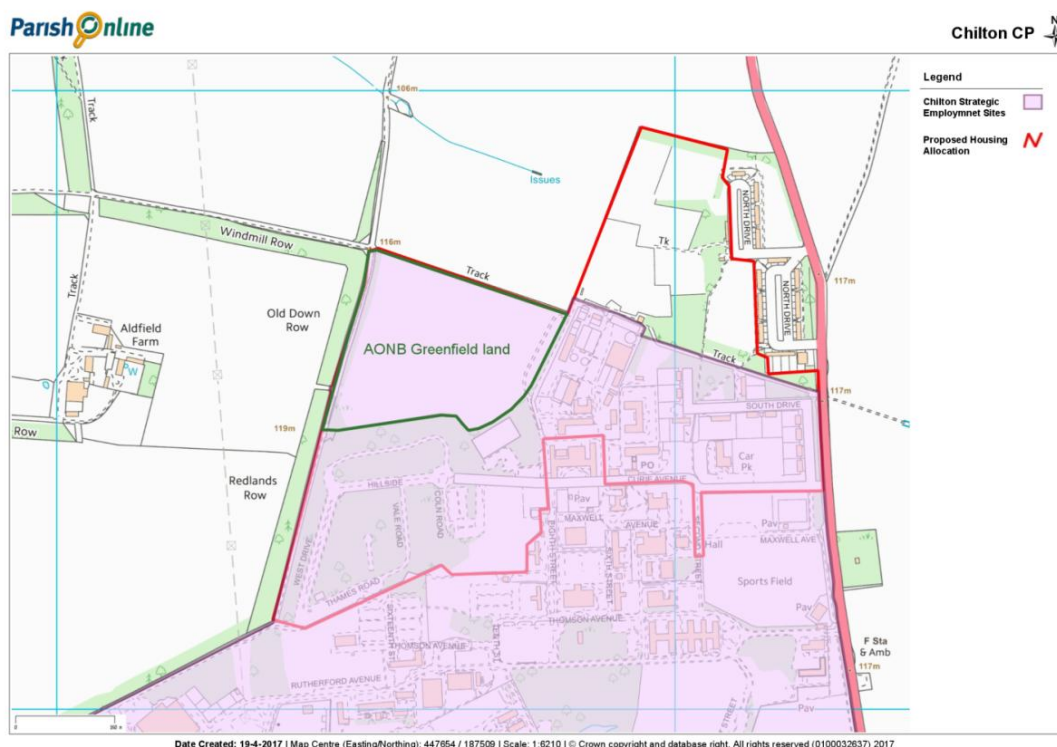
My principal concern in the Local Plan Part 2 centres on the proposed 1000-dwelling Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and, as a new large urbanisation located entirely within an existing AONB, precedent-setting significance nationally.

I object to Core Policy 4a for the following reasons:

1. Building at the Harwell Campus beyond campus employee needs is harmful to the North Wessex Downs Area of Outstanding Natural Beauty. It is unjustified and not consistent with national policy.

- (i) The question of large housing developments within the North Wessex Downs AONB was comprehensively assessed as Issue 5 during the Examination in Public (EiP) of the Local Plan Part 1 in 2016. The Part 2 Exceptional Circumstances report has provided written evidence to quantify, in terms of job creation, the economic importance of the Harwell Campus and has made a case for on-site housing development comprising a work-live-play community. However, away from aspirational projections, I cannot see the factual basis for such a large allocation of 1000 dwellings.
- (ii) Proposed extra provision to provide housing for Science Vale employment elsewhere than the Campus is inadmissible as it does not provide the required exceptional circumstance for the siting of major housing within the AONB i.e. on-Campus to support Campus employers.
- (iii) This inappropriate extra provision has pushed up the allocation so that greenfield AONB within the campus perimeter now, unnecessarily, forms part of the proposed allocated land. The latter should be fulfilled outside the AONB although it is noted that new Government-proposed calculations for Objective Assessed Need (OAN), (recently the subject of national consultation) suggest such off-campus demand may in any case be overstated (see below)

Fig. 1 Part 2 Campus housing allocation showing unnecessary AONB greenfield inclusion



- (iv) As such, the Plan is neither sustainable nor positively prepared and is unsound.

2. Unsound housing tenure and mix to meet development object of supporting Campus employment/employees

The comprehensive design framework pp 46-50 proposes a work-live-play community but makes no reference to how this is to be achieved through form of tenure or housing mix. Campus-type accommodation has specific needs:

- Flexibility; short-term occupation by workers and individuals will dominate; timescales in months rather than decades
- High proportion of single and twin occupancy units; apartments, graduate-flat type accommodation
- Serviced, hall of residence style accommodation with associated communal leisure areas (refectories, common rooms, sports areas, games rooms)
- Infrastructure geared to working age demographic

Yet for Part 2, the scheme would only need to meet the General Requirement for All Housing Site Allocations for all other VWHDC development (Appendix A pp 5-7). This requires 65% open market housing, 35% affordable housing split. The Harwell Exceptional Circumstances Report assumes/proposes just that split (Table 4-1). For this particular site such generalised arrangements are neither appropriate nor sustainable:

- Open market housing by its very nature offers no scope to constrain residence to employees; new buyers can buy and commute to work where they like, or not even be in the local labour market (e.g. retirees).
- Even homes bought initially by campus workforce would be similarly unconstrained on subsequent resale.
- Many employees of the several large public-sector organisations on site would be unable to afford the housing at local market rates.
- Buy-to-let properties lease to any suitable tenant, irrespective of their workplace location.
- The result would be that an unknown and diminishing-with-time proportion of the 65% market sector housing would be available for/occupied by Campus employees/workers. This proportion could be as small as 10-15%.
- The Parish Council tested the assumption that inclusion of dominantly open-market housing would provide the required housing for campus workforce by conducting a survey in December 2015 (reported in its Part 1 submission). Households living in the newly built Chilton Field estate (a development of 275 houses completed 2013 on the southern edge of Harwell Campus) were surveyed. It showed that only **10.4%** of householders surveyed were in employment on the Campus. This estate has a 75%/25% open market/affordable split
- Similar constraints apply to simply assigning a 35% affordable housing component because these have been typically operated in recent years by housing associations. This is because neither VWHDC Housing Allocation Policies nor VWHDC housing needs assessments include workplace criteria (proximity, national importance of research & innovation etc etc) when allocating housing.
- An additional factor is that housing association property is subject to right-to-buy legislation, which would in the long term transfer part of the affordable allocation across to open-market, further reducing availability to campus employers

I conclude that the housing tenure proposals in Part 2 are unsound, being too sketchily outlined to be able to assess their effectiveness.

A much closer link between employing organisations and the occupants of the proposed

housing is needed, so that employers have access to housing for their employees/associates and campus workers have total priority in occupancy of the units .

Note: A successful local historical example was Bracknell Development Corporation which offered tranches of LA controlled-rent properties to attract incoming new businesses.

3. It is unsound to plan for a surplus without an accompanying policy.

(i) The present housing target p18 is stated to be 22,760. The proposed supply totals 24748 i.e. an over-supply of almost 2000 dwellings;

Housing Completions	4672
Housing Commitments	3061
Local Plan 1 Allocations	12495
Local Plan 2 Allocations	3420
Windfalls	<u>1100</u>
Total Land Supply	24748 (a surplus of 1,988 dwellings).

It can be argued therefore that no pressing need to allocate land for 1,000 dwellings at Harwell Campus. A smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.

(ii) There are advocates of over-provision as a means of addressing shortfalls due to e.g. land banking by developers. However, there is no specific mention of this in Core Policy 4a even though it is an important policy decision. As such this policy with its explanatory table of proposed provision is misleading. It is not legally compliant and is also unsound

4. The SHMA itself is now unsound.

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is unsound because it conflates 'housing need' and 'housing demand' in planning policy i.e. numbers matter more than type and tenure of housing.

The Government has now accepted as much by publishing different proposals in a current national consultation prior to a White Paper early in 2018. An assessment in the consultation suggests much lower housing need figures for Oxfordshire. In the Vale's case these are reduced by 33%.

	dwellings/annum
Plan allocation	1028
Current central govt. assessment	689
% reduction	33%

Ref: *Planning for the right homes in the right places: consultation proposals HMG 2018. White Paper to follow 2018*

It can be argued again therefore that there is no pressing need to allocate land for 1,000 dwellings at Harwell Campus because there may be massive over-provision. Again, a smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.

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Paragraph

Policy

15a

Policies Map

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Yes

No

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Yes

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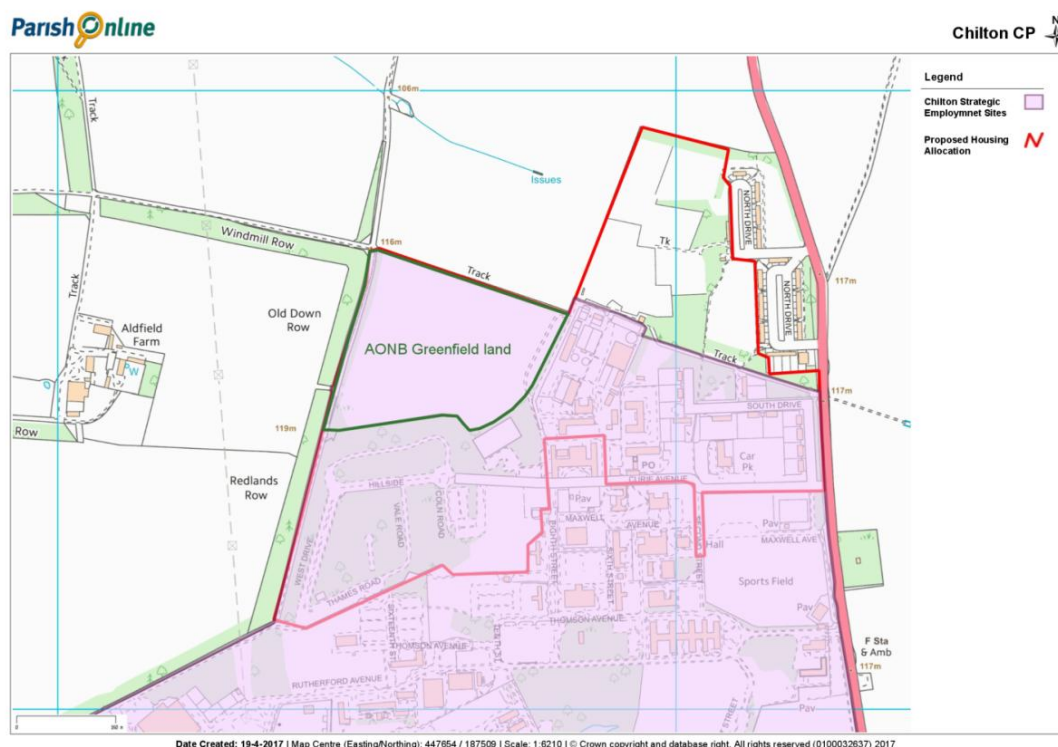
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I object to Core Policy 15a for the following reasons:

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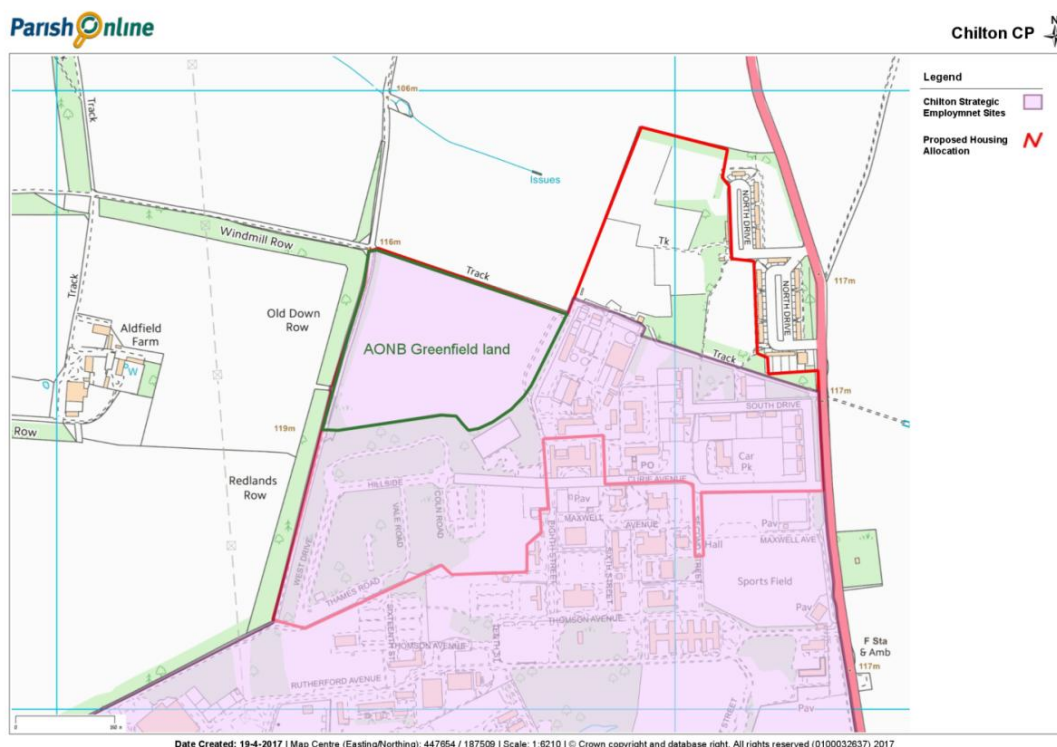
My principal concern in the Local Plan Part 2 centres on the proposed 1000-dwelling Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and, as a new large urbanisation located entirely within an existing AONB, precedent-setting significance nationally.

I object to Core Policy 15b for the following reasons:

1. Building at the Harwell Campus beyond campus employee needs is harmful to the North Wessex Downs Area of Outstanding Natural Beauty. It is unjustified and not consistent with national policy.

- (i) The question of large housing developments within the North Wessex Downs AONB was comprehensively assessed as Issue 5 during the Examination in Public (EiP) of the Local Plan Part 1 in 2016. The Part 2 Exceptional Circumstances report has provided written evidence to quantify, in terms of job creation, the economic importance of the Harwell Campus and has made a case for on-site housing development comprising a work-live-play community. However, away from aspirational projections, I cannot see the factual basis for such a large allocation of 1000 dwellings.
- (ii) Proposed extra provision to provide housing for Science Vale employment elsewhere than the Campus is inadmissible as it does not provide the required exceptional circumstance for the siting of major housing within the AONB i.e. on-Campus to support Campus employers.
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Fig. 1 Part 2 Campus housing allocation showing unnecessary AONB greenfield inclusion



- (iv) As such, the Plan is neither sustainable nor positively prepared and is unsound.

2. Unsound housing tenure and mix to meet development object of supporting Campus employment/employees

The comprehensive design framework pp 46-50 proposes a work-live-play community but makes no reference to how this is to be achieved through form of tenure or housing mix. Campus-type accommodation has specific needs:

- Flexibility; short-term occupation by workers and individuals will dominate; timescales in months rather than decades
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Yet for Part 2, the scheme would only need to meet the General Requirement for All Housing Site Allocations for all other VWHDC development (Appendix A pp 5-7). This requires 65% open market housing, 35% affordable housing split. The Harwell Exceptional Circumstances Report assumes/proposes just that split (Table 4-1). For this particular site such generalised arrangements are neither appropriate nor sustainable:

- Open market housing by its very nature offers no scope to constrain residence to employees; new buyers can buy and commute to work where they like, or not even be in the local labour market (e.g. retirees).
- Even homes bought initially by campus workforce would be similarly unconstrained on subsequent resale.
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- Buy-to-let properties lease to any suitable tenant, irrespective of their workplace location.
- The result would be that an unknown and diminishing-with-time proportion of the 65% market sector housing would be available for/occupied by Campus employees/workers. This proportion could be as small as 10-15%.
- The Parish Council tested the assumption that inclusion of dominantly open-market housing would provide the required housing for campus workforce by conducting a survey in December 2015 (reported in its Part 1 submission). Households living in the newly built Chilton Field estate (a development of 275 houses completed 2013 on the southern edge of Harwell Campus) were surveyed. It showed that only **10.4%** of householders surveyed were in employment on the Campus. This estate has a 75%/25% open market/affordable split
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- An additional factor is that housing association property is subject to right-to-buy legislation, which would in the long term transfer part of the affordable allocation across to open-market, further reducing availability to campus employers

I conclude that the housing tenure proposals in Part 2 are unsound, being too sketchily outlined to be able to assess their effectiveness.

A much closer link between employing organisations and the occupants of the proposed

housing is needed, so that employers have access to housing for their employees/associates and campus workers have total priority in occupancy of the units .

Note: A successful local historical example was Bracknell Development Corporation which offered tranches of LA controlled-rent properties to attract incoming new businesses.

3. It is unsound to plan for a surplus without an accompanying policy.

(i) The present housing target p18 is stated to be 22,760. The proposed supply totals 24748 i.e. an over-supply of almost 2000 dwellings;

Housing Completions	4672
Housing Commitments	3061
Local Plan 1 Allocations	12495
Local Plan 2 Allocations	3420
Windfalls	<u>1100</u>
Total Land Supply	24748 (a surplus of 1,988 dwellings).

It can be argued therefore that no pressing need to allocate land for 1,000 dwellings at Harwell Campus. A smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.

(ii) There are advocates of over-provision as a means of addressing shortfalls due to e.g. land banking by developers. However, there is no specific mention of this in Core Policy 4a even though it is an important policy decision. As such this policy with its explanatory table of proposed provision is misleading. It is not legally compliant and is also unsound

4. The SHMA itself is now unsound.

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is unsound because it conflates 'housing need' and 'housing demand' in planning policy i.e. numbers matter more than type and tenure of housing.

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	dwellings/annum
Plan allocation	1028
Current central govt. assessment	689
% reduction	33%

Ref: *Planning for the right homes in the right places: consultation proposals HMG 2018. White Paper to follow 2018*

It can be argued again therefore that there is no pressing need to allocate land for 1,000 dwellings at Harwell Campus because there may be massive over-provision. Again, a smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.

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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Brian"/>	<input type="text"/>
Last Name	<input type="text" value="Morris"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

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

Appendix A

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) Complies 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.

See details in accompanying submission

(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.

Revise the Policy so that a smaller allocation meets solely and specifically the on-site housing requirements of Campus employers for their staff/visitors. As open market and housing association-managed tenure models cannot attain this objective, such provision should be made under the continuing control of the Campus.

(Continue on page 4 /expand box if necessary)

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

☐

No

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:

N/A

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:

Brian Morris

Date:

18 Nov.2017

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

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Please do not contact me again

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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.**

Q5- see text below

Representation on Appendix A

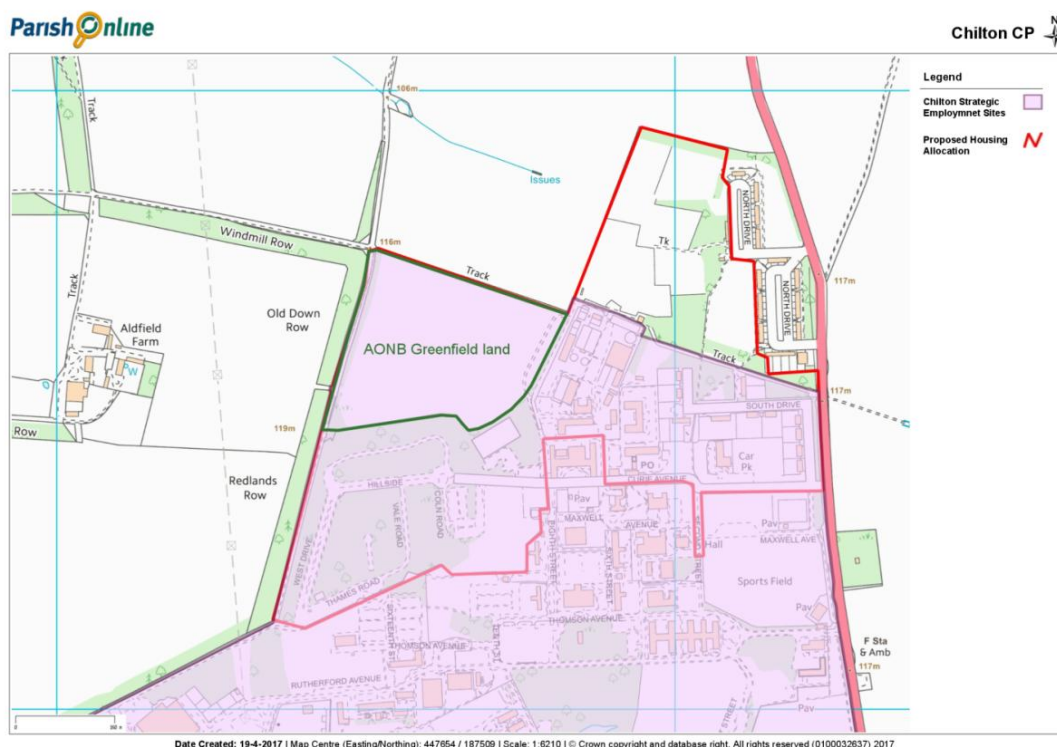
My principal concern in the Local Plan Part 2 centres on the proposed 1000-dwelling Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and, as a new large urbanisation located entirely within an existing AONB, precedent-setting significance nationally.

I object to Appendix A for the following reasons:

1. Building at the Harwell Campus beyond campus employee needs is harmful to the North Wessex Downs Area of Outstanding Natural Beauty. It is unjustified and not consistent with national policy.

- (i) The question of large housing developments within the North Wessex Downs AONB was comprehensively assessed as Issue 5 during the Examination in Public (EiP) of the Local Plan Part 1 in 2016. The Part 2 Exceptional Circumstances report has provided written evidence to quantify, in terms of job creation, the economic importance of the Harwell Campus and has made a case for on-site housing development comprising a work-live-play community. However, away from aspirational projections, I cannot see the factual basis for such a large allocation of 1000 dwellings.
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Fig. 1 Part 2 Campus housing allocation showing unnecessary AONB greenfield inclusion



- (iv) As such, the Plan is neither sustainable nor positively prepared and is unsound.

2. Unsound housing tenure and mix to meet development object of supporting Campus employment/employees

The comprehensive design framework pp 46-50 proposes a work-live-play community but makes no reference to how this is to be achieved through form of tenure or housing mix. Campus-type accommodation has specific needs:

- Flexibility; short-term occupation by workers and individuals will dominate; timescales in months rather than decades
- High proportion of single and twin occupancy units; apartments, graduate-flat type accommodation
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Yet for Part 2, the scheme would only need to meet the General Requirement for All Housing Site Allocations for all other VWHDC development (Appendix A pp 5-7). This requires 65% open market housing, 35% affordable housing split. The Harwell Exceptional Circumstances Report assumes/proposes just that split (Table 4-1). For this particular site such generalised arrangements are neither appropriate nor sustainable:

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- An additional factor is that housing association property is subject to right-to-buy legislation, which would in the long term transfer part of the affordable allocation across to open-market, further reducing availability to campus employers

I conclude that the housing tenure proposals in Part 2 are unsound, being too sketchily outlined to be able to assess their effectiveness.

A much closer link between employing organisations and the occupants of the proposed

housing is needed, so that employers have access to housing for their employees/associates and campus workers have total priority in occupancy of the units .

Note: A successful local historical example was Bracknell Development Corporation which offered tranches of LA controlled-rent properties to attract incoming new businesses.

3. It is unsound to plan for a surplus without an accompanying policy.

(i) The present housing target p18 is stated to be 22,760. The proposed supply totals 24748 i.e. an over-supply of almost 2000 dwellings;

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Plan allocation	1028
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Ref: *Planning for the right homes in the right places: consultation proposals HMG 2018. White Paper to follow 2018*

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2. Agent's Details (if applicable)

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Last Name	<input type="text" value="Morris"/>	<input type="text"/>
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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

Appendix C

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) Complies 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.

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☐

No

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

☐

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Brian Morris

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Representation on Appendix C

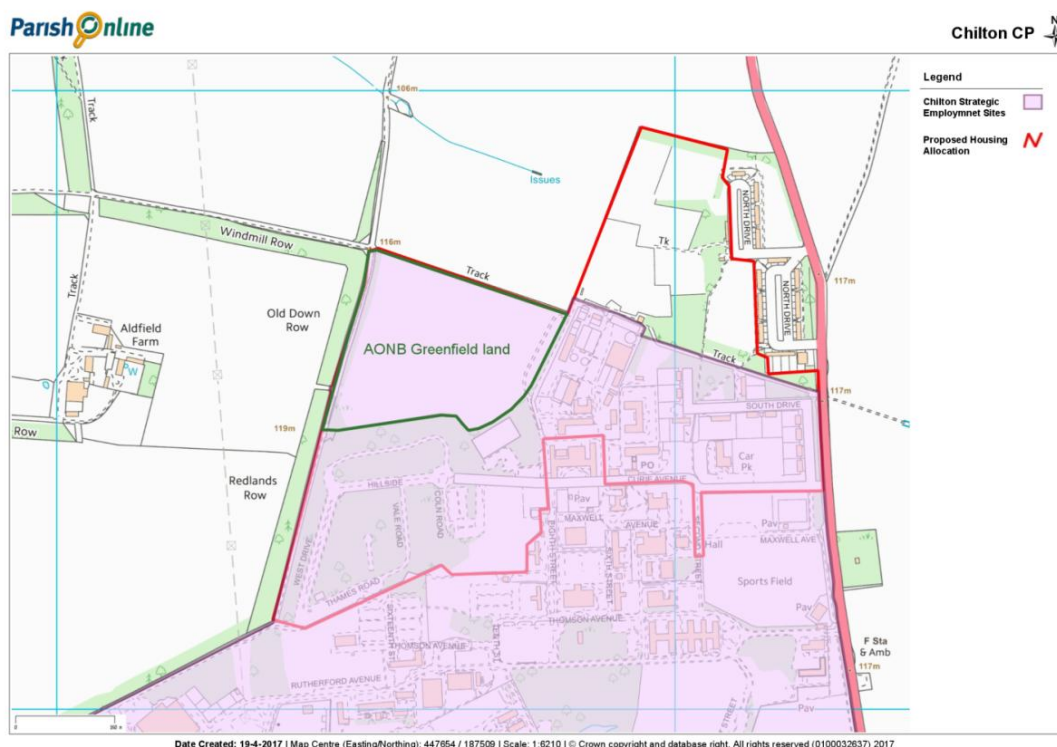
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I object to Appendix C for the following reasons:

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- (iv) As such, the Plan is neither sustainable nor positively prepared and is unsound.

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I conclude that the housing tenure proposals in Part 2 are unsound, being too sketchily outlined to be able to assess their effectiveness.

A much closer link between employing organisations and the occupants of the proposed

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Ref: *Planning for the right homes in the right places: consultation proposals HMG 2018. White Paper to follow 2018*

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(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	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Brian"/>	<input type="text"/>
Last Name	<input type="text" value="Morris"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

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

Policies Map

Figure 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) Complies 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.

See details in accompanying submission

(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.

Revise the Policy so that a smaller allocation meets solely and specifically the on-site housing requirements of Campus employers for their staff/visitors. As open market and housing association-managed tenure models cannot attain this objective, such provision should be made under the continuing control of the Campus.

(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

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:

N/A

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:

Brian Morris

Date:

18 Nov.2017

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

☐

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

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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.**

Q5- see text below

Representation on Figure 2.6

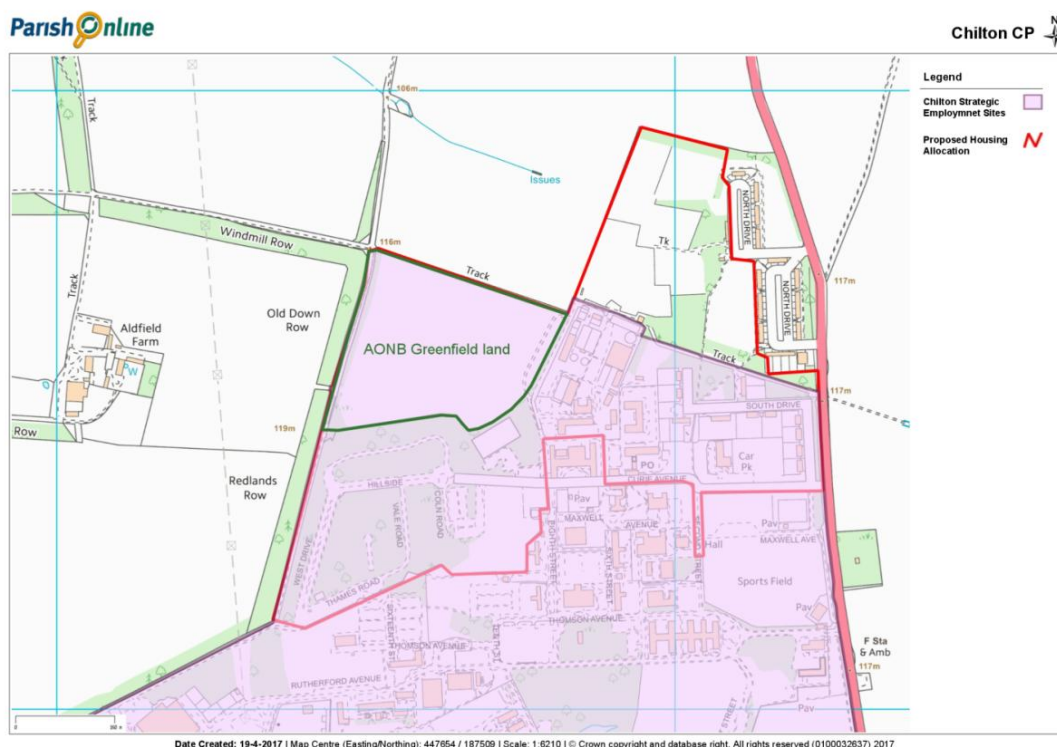
My principal concern in the Local Plan Part 2 centres on the proposed 1000-dwelling Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and, as a new large urbanisation located entirely within an existing AONB, precedent-setting significance nationally.

I object to Figure 2.6 for the following reasons:

1. Building at the Harwell Campus beyond campus employee needs is harmful to the North Wessex Downs Area of Outstanding Natural Beauty. It is unjustified and not consistent with national policy.

- (i) The question of large housing developments within the North Wessex Downs AONB was comprehensively assessed as Issue 5 during the Examination in Public (EiP) of the Local Plan Part 1 in 2016. The Part 2 Exceptional Circumstances report has provided written evidence to quantify, in terms of job creation, the economic importance of the Harwell Campus and has made a case for on-site housing development comprising a work-live-play community. However, away from aspirational projections, I cannot see the factual basis for such a large allocation of 1000 dwellings.
- (ii) Proposed extra provision to provide housing for Science Vale employment elsewhere than the Campus is inadmissible as it does not provide the required exceptional circumstance for the siting of major housing within the AONB i.e. on-Campus to support Campus employers.
- (iii) This inappropriate extra provision has pushed up the allocation so that greenfield AONB within the campus perimeter now, unnecessarily, forms part of the proposed allocated land. The latter should be fulfilled outside the AONB although it is noted that new Government-proposed calculations for Objective Assessed Need (OAN), (recently the subject of national consultation) suggest such off-campus demand may in any case be overstated (see below)

Fig. 1 Part 2 Campus housing allocation showing unnecessary AONB greenfield inclusion



- (iv) As such, the Plan is neither sustainable nor positively prepared and is unsound.

2. Unsound housing tenure and mix to meet development object of supporting Campus employment/employees

The comprehensive design framework pp 46-50 proposes a work-live-play community but makes no reference to how this is to be achieved through form of tenure or housing mix. Campus-type accommodation has specific needs:

- Flexibility; short-term occupation by workers and individuals will dominate; timescales in months rather than decades
- High proportion of single and twin occupancy units; apartments, graduate-flat type accommodation
- Serviced, hall of residence style accommodation with associated communal leisure areas (refectories, common rooms, sports areas, games rooms)
- Infrastructure geared to working age demographic

Yet for Part 2, the scheme would only need to meet the General Requirement for All Housing Site Allocations for all other VWHDC development (Appendix A pp 5-7). This requires 65% open market housing, 35% affordable housing split. The Harwell Exceptional Circumstances Report assumes/proposes just that split (Table 4-1). For this particular site such generalised arrangements are neither appropriate nor sustainable:

- Open market housing by its very nature offers no scope to constrain residence to employees; new buyers can buy and commute to work where they like, or not even be in the local labour market (e.g. retirees).
- Even homes bought initially by campus workforce would be similarly unconstrained on subsequent resale.
- Many employees of the several large public-sector organisations on site would be unable to afford the housing at local market rates.
- Buy-to-let properties lease to any suitable tenant, irrespective of their workplace location.
- The result would be that an unknown and diminishing-with-time proportion of the 65% market sector housing would be available for/occupied by Campus employees/workers. This proportion could be as small as 10-15%.
- The Parish Council tested the assumption that inclusion of dominantly open-market housing would provide the required housing for campus workforce by conducting a survey in December 2015 (reported in its Part 1 submission). Households living in the newly built Chilton Field estate (a development of 275 houses completed 2013 on the southern edge of Harwell Campus) were surveyed. It showed that only **10.4%** of householders surveyed were in employment on the Campus. This estate has a 75%/25% open market/affordable split
- Similar constraints apply to simply assigning a 35% affordable housing component because these have been typically operated in recent years by housing associations. This is because neither VWHDC Housing Allocation Policies nor VWHDC housing needs assessments include workplace criteria (proximity, national importance of research & innovation etc etc) when allocating housing.
- An additional factor is that housing association property is subject to right-to-buy legislation, which would in the long term transfer part of the affordable allocation across to open-market, further reducing availability to campus employers

I conclude that the housing tenure proposals in Part 2 are unsound, being too sketchily outlined to be able to assess their effectiveness.

A much closer link between employing organisations and the occupants of the proposed

housing is needed, so that employers have access to housing for their employees/associates and campus workers have total priority in occupancy of the units .

Note: A successful local historical example was Bracknell Development Corporation which offered tranches of LA controlled-rent properties to attract incoming new businesses.

3. It is unsound to plan for a surplus without an accompanying policy.

(i) The present housing target p18 is stated to be 22,760. The proposed supply totals 24748 i.e. an over-supply of almost 2000 dwellings;

Housing Completions	4672
Housing Commitments	3061
Local Plan 1 Allocations	12495
Local Plan 2 Allocations	3420
Windfalls	<u>1100</u>
Total Land Supply	24748 (a surplus of 1,988 dwellings).

It can be argued therefore that no pressing need to allocate land for 1,000 dwellings at Harwell Campus. A smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.

(ii) There are advocates of over-provision as a means of addressing shortfalls due to e.g. land banking by developers. However, there is no specific mention of this in Core Policy 4a even though it is an important policy decision. As such this policy with its explanatory table of proposed provision is misleading. It is not legally compliant and is also unsound

4. The SHMA itself is now unsound.

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is unsound because it conflates 'housing need' and 'housing demand' in planning policy i.e. numbers matter more than type and tenure of housing.

The Government has now accepted as much by publishing different proposals in a current national consultation prior to a White Paper early in 2018. An assessment in the consultation suggests much lower housing need figures for Oxfordshire. In the Vale's case these are reduced by 33%.

	dwellings/annum
Plan allocation	1028
Current central govt. assessment	689
% reduction	33%

Ref: *Planning for the right homes in the right places: consultation proposals HMG 2018. White Paper to follow 2018*

It can be argued again therefore that there is no pressing need to allocate land for 1,000 dwellings at Harwell Campus because there may be massive over-provision. Again, a smaller allocation, to match actual on-site employer requirements, would still leave a surplus of >1000 dwellings to meet the target number.