



Gladman Developments Ltd

Vale of White Horse Local Plan 2031 Part 2

Examination Stage 1: Hearing Sessions

Matter 4: Abingdon and Oxford Fringe Sub Area

- 1.1 Other than Dalton Barracks (Matter 5), are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements – both general and site specific – justified, consistent with national policy and would they be effective?**

North of East Hanney

- 1.1.1 Gladman has no comments to make on this proposed allocation.

North East of East Hanney

- 1.1.2 Gladman has no comments to make on this proposed allocation.

East of Kingston Bagpuize with Southmoor (in Fyfield and Tubney Parish)

- 1.1.3 Gladman has no comments to make on this proposed allocation.

South East of Marcham

- 1.1.4 The Council are currently proposing to allocate 90 dwellings within the LPP2 to the south east of Marcham. Gladman have a number of concerns over the Council's decision to allocate this site, and how the conclusion has been reached with regard to reasonable alternatives.

Air Quality

- 1.1.5 §124 of the NPPF is clear that:

“Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.”

1.1.6 The PPG (What is the role of Local Plans with regard to air quality?)¹ states:

“Local Plans can affect air quality in a number of ways, including through what development is proposed and where, and the encouragement given to sustainable transport. Therefore in plan making, it is important to take into account air quality management areas and other areas where there could be specific requirements or limitations on new development because of air quality.”

1.1.7 Local authorities have a central role in achieving improvements in air quality. They are best placed to decide and work with partners to implement appropriate solutions in regards to local transport, smoke control, planning and public health.

1.1.8 The Plan’s evidence base does not adequately address the impacts of the proposed allocation to the south east of Marcham on the Marcham AQMA.

1.1.9 The site to the south east of Marcham is more likely to impact upon the designated AQMA, than Gladman’s site to the north east of Marcham. Car trips from Gladman’s site to the north east are not likely to use the particularly narrow stretch of Packhorse Lane, instead travelling east on Howard Cornish Road to travel to the A34 and Abingdon, or west on North Street, and heading west towards Wantage.

1.1.10 Whilst the majority of trips from the proposed allocation will also travel east to Abingdon and the A34, new residents travelling to the west, to settlements such as Wantage, will be far more likely to travel through the AQMA and along Packhorse Lane.

1.1.11 Gladman do not consider that the impacts of this have been properly considered within the Sustainability Appraisal for the LPP2. §10.11.2 of the SA states:

“The March 2017 Interim SA report recommended that further work be undertaken to predict the increases in traffic congestion within the AQMA that would result from proposed housing growth. There remains a need for detailed work - e.g. in respect of junction arrangements at the South East Marcham site, and the risk of stationary traffic tailing back in the AQMA - however, it is noted that the quantum of growth proposed at Marcham has been reduced significantly. Specifically, whilst the Preferred Options consultation document (2017) proposed 520 homes at Marcham, the current proposal is for 90 homes.”

¹ Paragraph 02, Referenced ID: 32-002-20140306

- 1.1.12 Gladman do not consider that this is an appropriate assessment of the potential effects of the proposed allocation to the south east of Marcham on the Marcham AQMA. In this respect, the allocation is not justified or effective, as per the requirements of §182 of the NPPF. The Sustainability Appraisal has not adequately assessed the preferred option to the south east of Marcham in relation to other reasonable alternatives, including the site to the north east of Marcham. For example, the SA, with regard to the reasonable alternative to the north east of Marcham, states:

“North East Marcham – non-allocation should be a constant across the reasonable alternatives. This conclusion reflects consultation responses received from the County Council, who object to growth at this location ahead of a Marcham Bypass, given the designated Marcham Air Quality Management Area (AQMA), and also on the basis that Marcham is not on a strategic public transport corridor.”

- 1.1.13 As above, the likely impacts of the site to the north east of Marcham will be lesser on the identified AQMA than the site to the south east of Marcham. It would also appear that the County Council has objected to all reasonable alternatives within Marcham, which must logically also include the preferred option.

Development Requirements

- 1.1.14 The Local Plan does not set out any information regarding development requirements for the site allocations. Core Policy 8a, sets out the indicative yields of the proposed allocations, but there is no reference to the infrastructure provisions that need to be provided on site. The PPG (Reference ID: 12-011-20140306) is clear that:

“Where sites are proposed for allocation, sufficient detail should be given to provide clarity for developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).”

- 1.1.15 The decision making process behind these sites has not been transparent and Gladman strongly object to the allocation of these sites. The Sustainability Appraisal does not show a logical, transparent and considered approach to allocating these sites, and the Council do not appear to have given enough consideration to other sites with the potential to help deliver their full, objectively assessed, market and affordable housing needs.
- 1.1.16 It is prerequisite that these sites could only come forward with the necessary mitigation in order for them to be acceptable. There needs to be a Policy in the plan which includes these items, which should be known by the Council.
- 1.1.17 It is Gladman’s understanding that the Council has never properly consulted with the local community and interested stakeholders on the requirements for their site allocations.

North East Marcham

- 1.1.18 Gladman seeks the allocation of land south of Cow Lane, Marcham. The site lies to the north east of Marcham.
- 1.1.19 Marcham is a sustainable settlement with a good range of services and facilities which are within easy walking distance of the site. These include: Primary School, village shop, pub, post office, village hall and sports club and playing fields.
- 1.1.20 Measures can be taken which will ensure that a net biodiversity gain can be made in accordance with requirements of Paragraphs 9 and 119 of the NPPF.
- 1.1.21 The local highway network has the capacity to accommodate the additional traffic associated with the development without adverse impact.
- 1.1.22 The site has the capacity to accommodate approximately 120 dwellings of which 35% would be affordable. In accordance with the NPPF, this is a deliverable site, available now, with a realistic prospect of development within 5 years.

1.2 Are the proposals to safeguard land for the Marcham by-pass justified? Would there be any adverse impacts?

- 1.2.1 Gladman has no comments to make on this question.

1.3 Are the proposals to extend the area of safeguarded land for the Upper Thames Strategic Storage Reservoir justified? Would there be any adverse impacts?

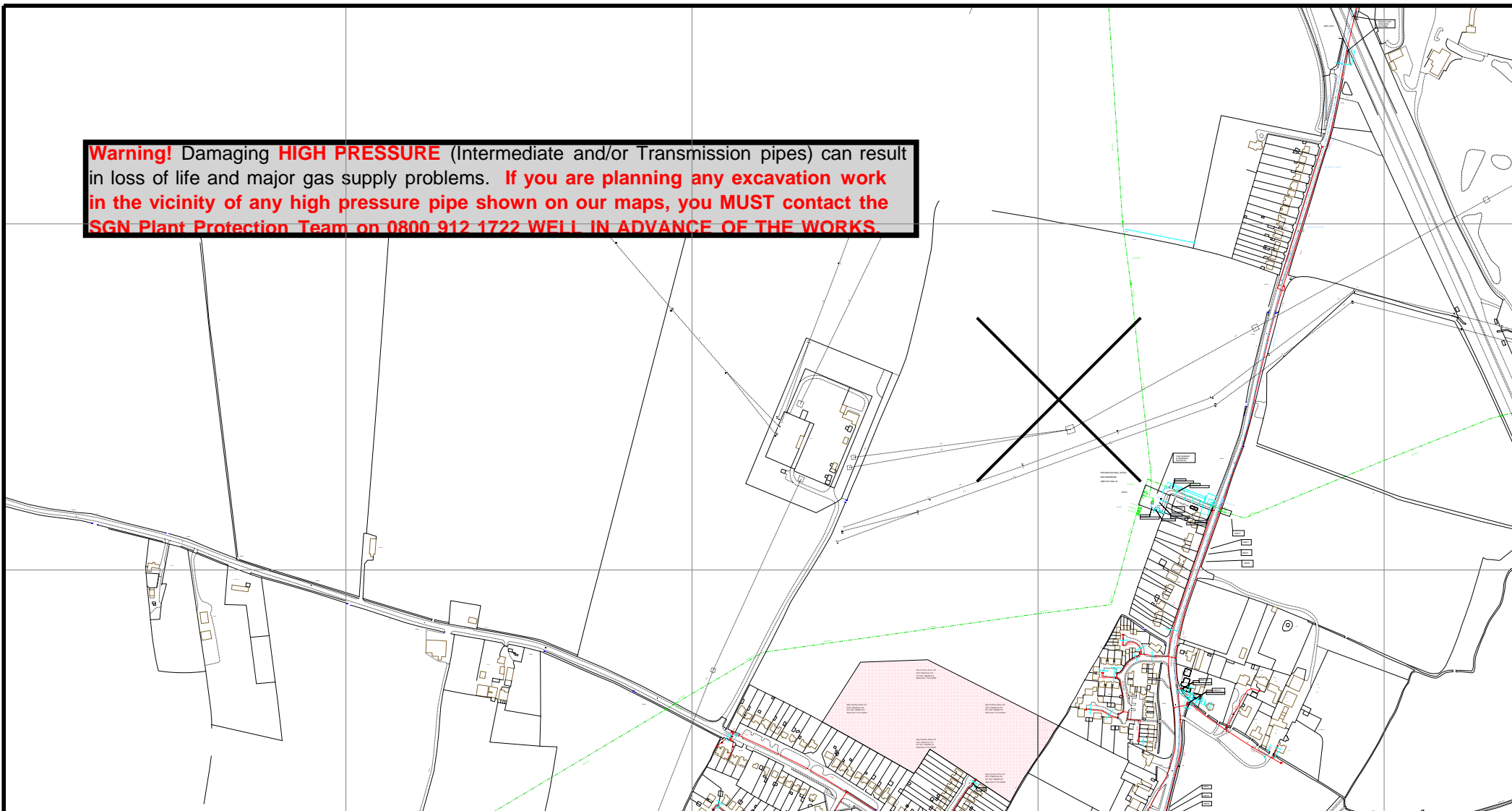
- 1.3.1 The Part 1 Local Plan as submitted for examination, safeguarded land to the west of Abingdon for a reservoir under Policy CP14. In response to the submitted Plan, Thames Water sought the expansion of the safeguarded area which was then proposed as a modification to the Plan. Gladman objected to the proposed modification to the Plan, and following discussion at the examination hearing, the Inspector found that *“there is not currently the evidence to determine whether or not the extended safeguarded area for the reservoir between East Hanney, Marcham and Steventon is soundly based.”* The Inspector concluded that it was not appropriate to extend the safeguarded area at that stage and that the possible revisions to the safeguarded area should be considered through the Part 2 Local Plan.
- 1.3.2 Accordingly, Core Policy 14a of the Part 2 Local Plan proposes an extended area of land to be safeguarded for a reservoir and ancillary works between the settlements of Drayton, East Hanney and Steventon. Whilst Gladman recognises that the Council has amended the boundary of the proposed safeguarded area in Core Policy 14a, but the reservoir still abuts residential properties, which Gladman does not consider to be acceptable. The revised boundary also includes land that has planning permission for open space and the boundary should be amended to reflect this.
- 1.3.3 Gladman maintains its objections to the safeguarded area which impinges on land at Hanney Road, Steventon which already has the benefit of full planning permission for residential development. In

Gladman's opinion, land that has the benefit of full planning permission for residential development should not then be safeguarded for an alternative use. It is not the purpose of the Local Plan to effectively sterilise large areas of land without sufficient justification or certainty. Once Thames Water has finalised its plans, only then should it progress with a scheme that ordinarily involves approaching landowners and compulsory purchase (if required) in the normal way. Gladman has concerns that by safeguarding, the reasonable rights of affected landowners may be prejudiced and that process should take place outside of a Local Plan; that is why Thames Water has been granted the powers that it has.

- 1.3.4 In Appendix F of the Publication version of the Part I Local Plan, the safeguarded area was shown as a generally elliptical shape with its eastern edge abutting the western edge of the village of Steventon. In the Part 2 Plan (Appendix D), the safeguarded area is now larger and more defined with its eastern edge extending nearer to the village of Steventon to the extent that it now includes part of an area of land for which Gladman has obtained full planning permission for the erection of 65 residential dwellings including access, landscaping and associated works. (Ref: P14/V1952/FUL). The decision notice is dated 9th October 2015. The site area is indicated on Plan 1 below. This forms the second phase of residential development, the first phase having been granted planning permission in April 2013.
- 1.3.5 The reservoir proposal itself is not included in the current Thames Water Resources Management Plan 2014 and at this stage is only the preferred location if a new large storage reservoir solution is decided as the means to address its future water resource management in the 2019 Water Resources Management Plan.
- 1.3.6 In view of the high degree of uncertainty surrounding this project, Gladman considers that the inclusion of the safeguarding area in the Local Plan Part 2 is inappropriate and premature at the present time. If, however, the proposal is retained in the Local Plan Part 2, Gladman strongly contends that the safeguarding area should be amended to exclude the above mentioned land at Steventon.
- 1.3.7 Furthermore it is apparent that a major electricity substation is included within the safeguarded area although no apparent buffer to this infrastructure has been allowed for. It is unclear at this stage whether these proposals have been communicated and/or agreed with the National Grid. However, and perhaps more concerning, is Thames Water's proposal to leave open land immediately adjoin the embankment and then to locate the flood compensation lower shelf and a watercourse diversion immediately alongside the electricity substation. Recent history is testament to the need to avoid the juxtaposition of electricity substations and new watercourses and floodwater where these can be avoided.
- 1.3.8 Thame Water also appears to have overlooked an existing Intermediate Gas Main across part of the site (see Plan 2 below). In order to reconcile this oversight, Gladman requests that the site benefitting from planning permission be excluded from the safeguarded land forthwith and the plan be amended to avoid the above mentioned anomalies (see Plan 3 below).

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- 1.3.9 Put simply, Gladman contends that the Council cannot safeguard land for a reservoir on land which benefits from an extant planning permission and that Core Policy 14a is unsound as there is no justification or need for the land to be safeguarded in the Local Plan Part 2 at all.
- 1.3.10 Given the above, Gladman consider that Core Policy 14a is not justified, or effective, as per §182 of the Framework.

Warning! Damaging **HIGH PRESSURE** (Intermediate and/or Transmission pipes) can result in loss of life and major gas supply problems. **If you are planning any excavation work in the vicinity of any high pressure pipe shown on our maps, you MUST contact the SGN Plant Protection Team on 0800 912 1722 WELL IN ADVANCE OF THE WORKS.**



USER ID: I.simmons

DATE: 02 Jun 2016

EXTRACT DATE: 04 Apr 2016

MAP REF: SU4692NE

CENTRE: 446603, 192731

SCALE: 1:7,896

LP Mains

MP Mains

IP Mains

LHP Mains

NHP Mains



This plan shows those pipes owned by Scotia Gas Networks plc in their role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc. are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Scotia Gas Networks plc or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

Product: UtilityMaps

Version: 1.6.8.1

Template: 'Scotia Gas Networks (A4 Landscape)'

Valve



Depth of Cover



Syphon



Diameter Change

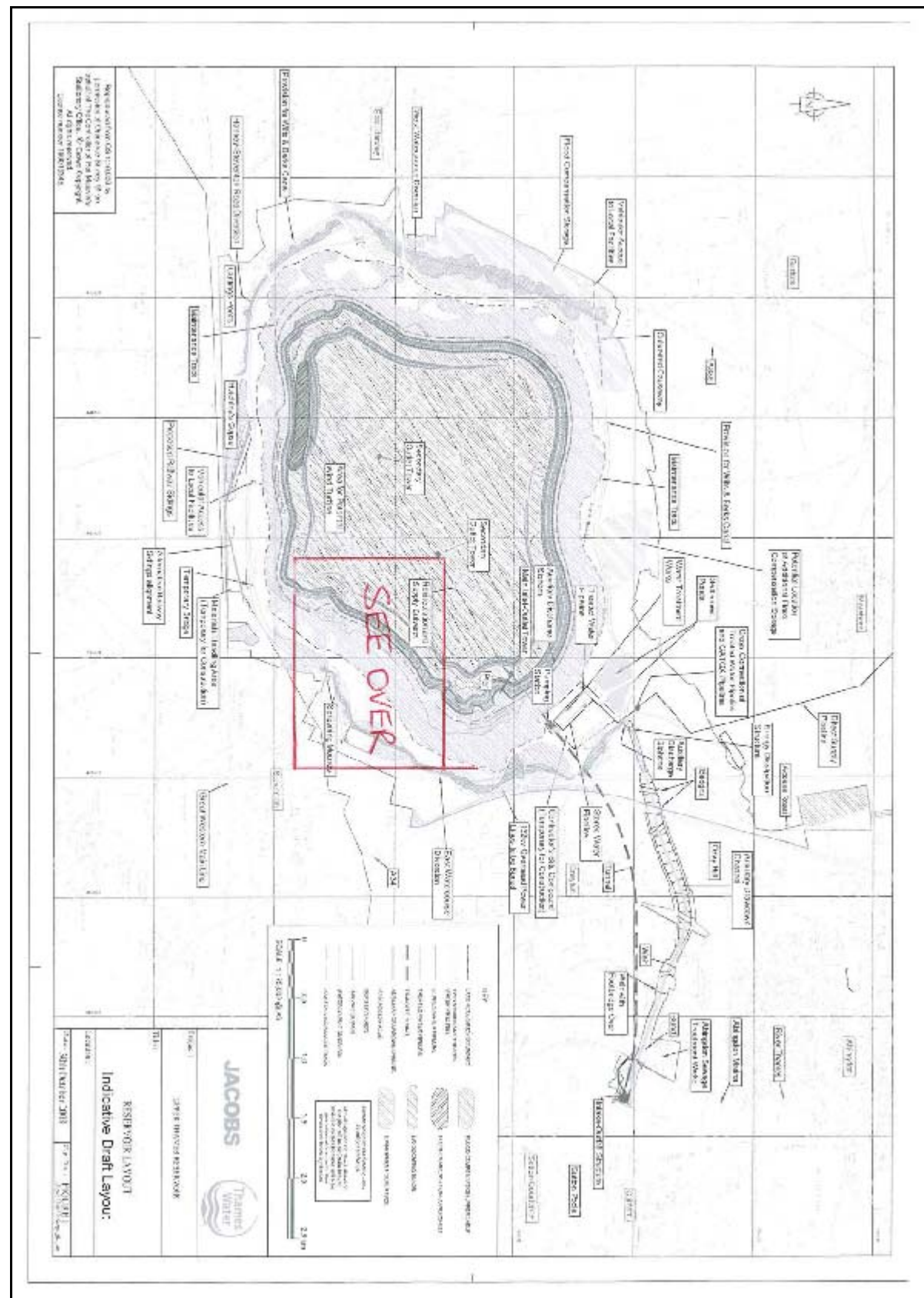


Material Change



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Plan 3 Proposed Amendment to Safeguarded Area



EXTRACT from JACOBS RESERVOIR LAYOUT

