



# Examination into the Vale of White Horse Local Plan 2031 (Part 1 Strategic Sites and Policies)


## Hearing Statement

Representations on behalf of

**Mr Robin Herd**

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Signature  
  
Signature

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This statement is submitted to the Examination into the Vale of White Horse Local Plan 2031 (Part 1 Strategic Sites and Policies) on behalf of Mr Robin Herd and other landowners. We request that the original representation letter, dated 19th December 2014, should be read in conjunction with this statement. Please find attached location plan showing our client's land. The land is approximately 5.8 hectares in size and has the potential to deliver circa 200 dwellings. This statement refers to the following Matters, identified by the Inspector in his State 1 – Matters and Questions:

### Matter 3: Spatial Strategy and Housing Supply Ring Fence

Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based? In particular:

- (a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3 and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?
- (b) Does the distribution appropriately reflect the role of Oxford in providing for employment and services for the residents of Vale of White Horse?

Is it feasible that a significantly different distribution of housing development from that proposed could be delivered?

Is the "housing supply ring fence" approach of policy CP5 to the delivery of housing in the Science Vale area (a) adequately explained in terms of its practical operation, (b) justified, (c) likely to be effective and (d) in accordance with national policy?

We support the principle of the extension of the settlement boundary for Milton Heights to the west and south, as previously proposed in February 2014. We also request that this settlement boundary as previously proposed is further extended to include the land subject of this representation for mainly two reasons:

- 1) Protection of land to be allocated within the Green Belt and AONB; and
- 2) To meet an immediate housing need within the district

The NPPF retains the strength of Green Belt and AONB designations. Paragraph 79 of the NPPF states that the Government attaches *great Importance (our emphasis)* to Green Belt.

As explained in detail in our representation letter, dated 19<sup>th</sup> December 2014, the Government emphasises that land within Green Belts and AONBs should be given highest status of protection. In NPPG, the Government also made it clear that unmet housing need is unlikely to outweigh the harm to the Green Belt or AONB. There are no transitional arrangements to the Government updated PPG. The advice in PPG is therefore relevant to the examination of the Vale of White Horse Local Plan 2031 Part One.

Paragraph 12.3.12 of Sustainability Assessment of the Vale of White Horse Local Plan 2031 Part 1 states that in identifying the preferred sites, the Council first considered those sites which were not located within the North Wessex Downs AONB or the Oxford Green Belt. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt. We do not agree with this assessment, as sites in sustainable locations are available, suitable and appropriate for development.

The land subject of representation, including the land to the north and east of the subject land, as previously suggested, is located outside the sensitive areas i.e. AONB and Green Belt. The land has no designations within the adopted Local Plan and is available, suitable and appropriate for

housing development. Furthermore, this land is located within the 'Science Vale Area' where around 15,850 or almost 70% of the 23,000 new jobs forecast for the district to 2031 are likely to be located, and supports the Council's ring-fence approach in emerging Core Policy 5. In comparison between our client's land and all four allocations with the Green Belt, it should be noted that our client's land is located in highly sustainable location as all four allocations within Green Belt are located outside the 'Science Vale Area'.

In summary, the strategic allocations within the Green Belt and AONB (as set out in original representation letter) must be protected. We question the Council's approach of proposing Green Belt Boundary amendments (which once established, should only be altered in exceptional circumstances; Paragraph 83 of the NPPF) and strategic site allocations on highly sensitive land, which is Green Belt and AONB to achieve housing requirements. In line with the NPPF and PPG, we do not consider that unmet housing need in the Vale of White Horse District in this instance outweighs the harm to the Green Belt and AONB and as such does not constitute 'Very Special Circumstances' for removing land from the Green Belt and AONB and allocating it for development given that these are sustainable alternative sites outside of the Green Belt and AONB. We consider that the Council's approach is inconsistent with advice in the NPPF and PPG.

Instead of proposing such Green Belt and AONB Boundary alterations, we consider that the Council should review the land subject of this representation and surrounding land as previously considered. We also acknowledge that there is a desire, and demand, for existing residents to remain in Milton Heights and new residents are attracted to the area where the Council expected growth (the Science Vale area). Therefore, there is an immediate need for housing to provide deliverable housing sites within the Science Vale area where there is known demand. The land subject to this representation is an ideal candidate in this respect.

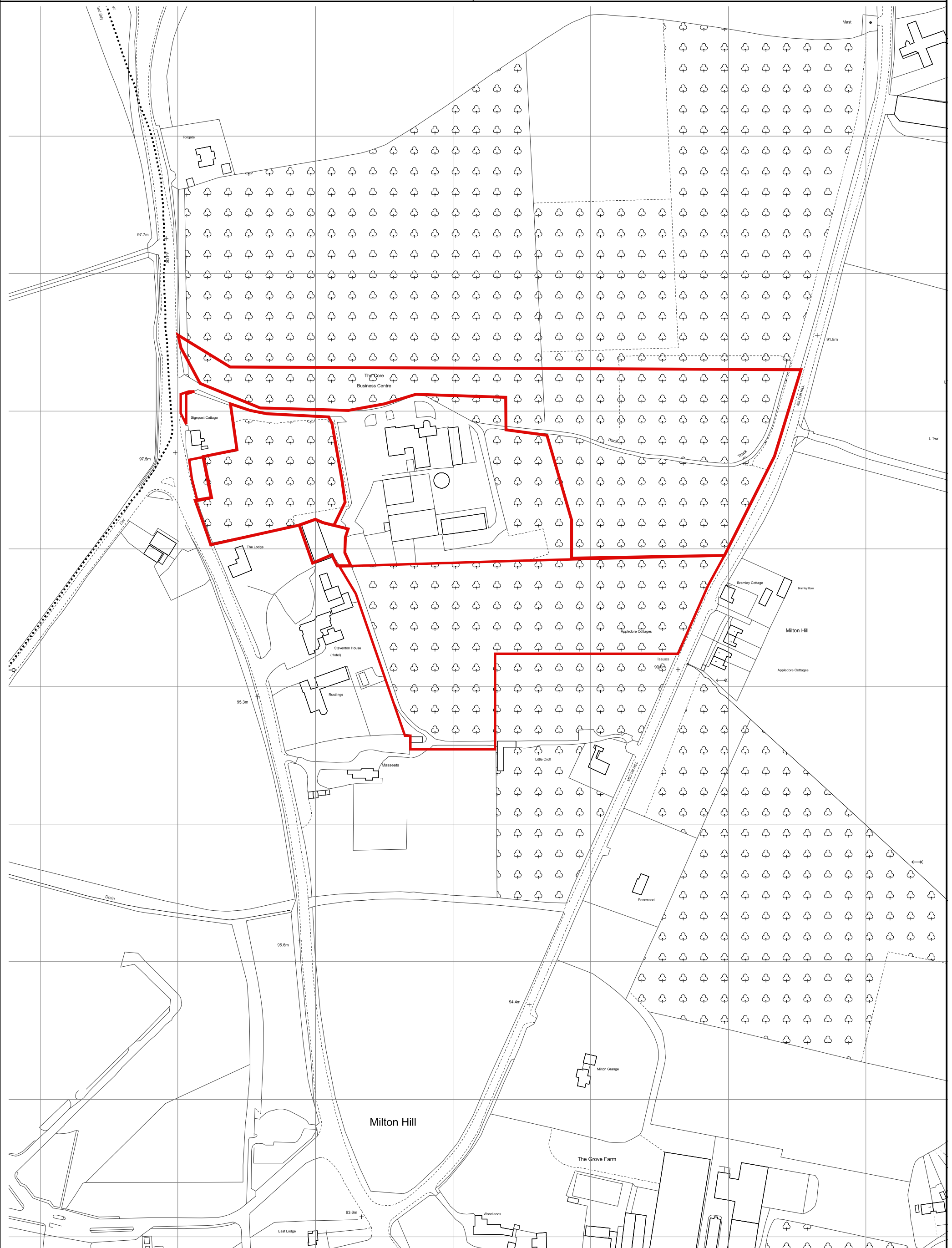
Our clients control the land subject of this representation, which is considered suitable, available, achievable and appropriate for housing development. The site would assist meeting an immediate need for providing local housing as well as meeting the district wide need. Allocating this land would assist releasing pressure on the Green Belt and AONB sites, which accorded highest designation. It provides for a sustainable approach to the planning of the settlement. Therefore, the land should be allocated for housing in the emerging Local Plan 2031.

Core Policy 4 (South East Vale Sub-Area) of the publication version of the Vale of White Horse Local Plan Part One: Strategic Sites and Policies (November 2014) is currently 'unsound' and should be amended to include the following allocation:

Milton Parish west of the A34: Milton Heights: 1,600 (with potential for a further 250 after 2031)

Do not scale from drawings unless for planning purposes only. Use figured dimensions at all other times. In case of doubt contact West Waddy:ADP  
Dimensions to be checked on site before work commences and any discrepancies reported to the Architect.

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Date		October 2014	
Scale		1:2500 @ A3	
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