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18<sup>th</sup> December 2014

Dear Sir / Madam,

**Re: Vale of White Horse Publication Version Local Plan – November 2014**  
**Land at Stockham Farm, Wantage OX12**

These representations are submitted by Dandara Ltd to the November 2014 publication version Vale of White Horse (VoWH) Local Plan 2013, Part 1. They should be read in conjunction with representations dated 9<sup>th</sup> May 2013 and 28<sup>th</sup> March 2014 prepared on behalf of Dandara Ltd by Daniel Watney LLP. The representations specifically consider Dandara Ltd's interest in the residential development of land at Stockham Farm.

**Introduction**

The VoWH originally granted planning permission for 200 new homes on land at Stockham Farm on 28<sup>th</sup> March 2013 (ref. P12/V1240/FUL) followed by a further 90 new homes on land to the south of Downsvie Road on 1<sup>st</sup> August 2014 (ref. P13/V1826/FUL). Both of these planning applications were submitted by Dandara Ltd securing the delivery of 290 new homes in Wantage, one of the most sustainable Market Towns in VoWH as recognised in the Local Plan, at a time when the Council could not demonstrate a five year supply of deliverable housing land.

Dandara Ltd has now submitted a final planning application on land located to the west of Stockham Farmhouse for an additional 90 new homes which is pending determination (ref. P14/V1810/FUL). It is acknowledged that the planning application site is not of a size that could deliver 200 new homes and it is not therefore the intention of these representations to put forward land falling to the west of Stockham Farmhouse as a strategic housing allocation to be included in Part 1 of the VoWH Local Plan.

Instead, these representations reiterate the importance of the VoWH undertaking a comprehensive review of the Local Plan settlement boundaries which, having regard to the draft Local Plan policies maps, have not been updated since 2006 despite recent grants, and implementations, of planning permissions. This failure to review settlement boundaries results in an out-of-date picture of the Vale's settlements and prevents sites being brought forward for new housing under draft Core Policy 4 which are well related to the existing settlement pattern and represent a coherent and sustainable source of new housing development.

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## Objection – Settlement Boundaries

Representations submitted by Dandara Ltd to the earlier draft of the VoWH Local Plan dated 28<sup>th</sup> March made it clear that in order for the Local Plan to be considered up-to-date and therefore sound, it was imperative that the VoWH undertook a review of its settlement boundaries since they were originally drawn during the preparation of the previous VoWH Local Plan, adopted in 2006. This settlement boundary review is important in the context of draft Core Policy 4 which states that

*“There is a presumption in favour of sustainable development within the existing built area of Market Towns, Local Service Centres and Larger Villages ...”.*

The effectiveness of this Core Policy, which is crucial to the Local Plan achieving a number of National Planning Policy Framework (NPPF) objectives including “... *boosting significantly the supply of housing ...*” (para. 47) and “*housing applications being considered in the context of the presumption in favour of sustainable development*” (para. 49), rests on the Local Plan including an up-to-date picture of settlement boundaries. The concern at present is that the boundaries for each settlement have not been updated in light of planning permissions and implementations granted by the Council since the 2006 Local Plan, especially given the number of approvals issued during the past 24 months whilst the Council has failed to demonstrate a five year supply of deliverable housing sites.

The principal objective of draft Core Policy 4 is to support the development of sites that are well related to the existing settlement pattern and thus represent a sustainable supply of housing land that should be supported through the Local Plan. However, in order for this Policy to be positively prepared, justified, effective and consistent with national policy, as required in order for the Plan to be found ‘sound’ under paragraph 182 of the NPPF, it is imperative that each settlement boundary within the VoWH is reviewed and brought up-to-date.

Without an up-to-date picture of VoWH settlement boundaries, draft Core Policy 4 will be neither effective nor able to achieve its principal objective of supporting the delivery of housing in sustainable locations well related to the existing settlement pattern. The Local Plan is thus considered to be unsound on the following basis:

- (i) ***Positively Prepared*** – The Plan is not currently able to demonstrate that it is significantly boosting housing supply as there are a number of sites which are well related to existing settlement boundaries, following recent grants and implementations of planning permission, but are unable to be brought forward for sustainable housing development as they remain outside defined settlement boundaries which are out-of-date and not fit for the intended purpose of draft Core Policy 4;
- (ii) ***Justified*** – The Plan is not currently the most appropriate strategy from a housing delivery perspective as draft Core Policy 4 is not able to adequately consider the contribution that sites, such as land to the west of Stockham Farmhouse, could play in assisting with the delivery of the VoWH housing need figure of 20,560 units over the Plan period. Such sites, which currently fall outside settlement boundaries established for the earlier 2006 Local Plan should, following recent grants of planning permission and implementations, now be included as part of a comprehensive review of up-to-date settlement boundaries. There may then be an opportunity for the VoWH to reduce reliance on more environmentally sensitive sites, such as those falling within AONBs, delivering housing to meet the 20,560 figure. This would ensure the Plan is in accordance with the NPPF which seeks to ensure that *“allocations of land for development should prefer land*



*of lesser environmental value ...*" (para. 17). As currently drafted, the Local Plan promotes the residential development of AONB land ahead of land, such as at Stockham Farm, which is environmentally less sensitive and sustainably located within the settlement structure of Wantage as one of the Vale's main Market Towns;

- (iii) **Effective** – The Plan is not able to effectively deliver housing in the most sustainable locations in order to meet the VoWH's full, objectively assessed housing need due to out-of-date settlement boundaries;
- (iv) **Consistent with National Policy** – The Plan is not in accordance with the NPPF as the reliance on out-of-date settlement boundaries does not allow the most sustainable, spatially coherent development sites to be brought forward and results in over-reliance on environmentally sensitive, strategic allocation sites.

In summary, the VoWH benefits from a supply of small to medium sized sites which are not large enough to benefit from a strategic allocation for housing. A number of these sites, such as land at Stockham Farm, are well related to existing settlements and, following recent grants and implementations of planning permissions, form a coherent extension to settlement boundaries originally drawn back in 2006. Whilst the Local Plan includes draft Core Policy 4 which adopts a positive approach towards supporting developments brought forward within existing settlements, because these settlements are based on out-of-date settlement boundaries, the effectiveness of the policy is being undermined and sites that should otherwise be allowed to be brought forward for housing because they are well related to existing settlements and ultimately sustainable, are not being allowed to deliver much needed new homes resulting in an over-reliance on environmentally more sensitive strategic sites. The VoWH should undertake an immediate review of their established settlement boundaries to ensure that the Plan is sound and emerging Core Policy 4 effective.

#### **Objection – Reliance on Larger Sites**

Over the past 24 months, the VoWH has been consistently unable to demonstrate a 5 year housing land supply as previously allocated sites have not been brought forward as quickly as expected. This has resulted in significantly less homes being delivered in VoWH than required to meet housing need principally because the VoWH was reliant upon a small number of large residential development sites being delivered by the market.

Dandara Ltd is concerned that the VoWH is potentially repeating the mistakes of the past by being overly reliant on larger sites to deliver housing. Whilst it is appreciated that the majority of future new housing in the District will come forward on larger sites, the VoWH should also consider designating smaller / medium sized sites which could make-up any housing shortfall should commonly experienced delays occur to housing delivery on larger sites due to viability or associated infrastructure delivery.

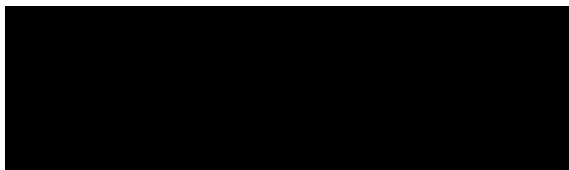
The Local Plan is overly reliant on either housing being delivered within existing settlements, defined by out-of-dated boundaries as explained above, or via large, strategic allocation sites. There is a real concern that the Plan is overlooking small and medium scale deliverable housing land, such as at Stockham Farm, which is not of a scale to be a strategic allocation and is currently located outside out-of-date settlement boundaries. These sites potentially represent an important supply of sustainable housing land, less environmentally sensitive than other sites currently proposed for allocation, that are currently not envisaged to contribute towards housing delivery. This further increases reliance on strategic housing sites, on environmentally more sensitive land, which have historically not come forward when expected within the VoWH leading to significant undersupply of housing.

### Support – Important Open Land

Dandara Ltd supports the reconsideration of the Council of the Important Open Land designation to the north and west of Wantage following the grant of planning permission for 290 new homes on land at Stockham Farm (refs. P12/V1240/FUL and P13/V1826/FUL). The revision to the Important Open Land designation on the draft Local Plan Policies Maps recognises the implications to the designation of introducing 290 new homes into its setting. It recognises that, due to the presence of a mature hedgerow and strong western settlement boundary comprising Stockham Park and the Crown Packaging Industrial Estate, land to the west of Stockham Farm is not required to be included within the Important Open Land designation to ensure its effectiveness in avoiding the coalescence of Wantage and East Challow. This is supported and it is recommended that settlement boundaries are revised likewise to ensure a consistent, up-to-date picture of the settlement edges of existing towns and villages are included in the Plan to direct appropriate new development to land that is sustainably related to the existing urban form.

We trust these representations are of interest and we look forward to continuing to work with VoWH to ensure a Local Plan that is able to meet full, objectively assessed housing need through the identification of a variety of sustainable sites of varying sizes throughout the District, which should include land at Stockham Farm.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

John Richards

Senior Planning Manager MRPTI