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L 141215 JSI Local Plan Part One Representation



Planning Policy
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Dear Sir/Madam

Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies

Savills is instructed by Gallagher Estates Ltd and Gleeson Strategic Land (referred to as Gallagher-Gleeson) in relation to land north of Grove. The following correspondence provides a response to the current consultation on the above document. This response should be read in addition to representations made to previous stages of the Local Plan, namely those made on the Draft Local Plan 2029 Part One (May 2013) and the Local Plan 2031 Strategic Sites and Policies Consultation Draft (February 2014).

Planning History

Applications have been submitted for two areas of the site identified within the emerging Local Plan as "Land to the North of Grove" as follows:

P12/V1545/O (Permission granted 12 th February 2014).	Outline application for residential development of up to 133 dwellings with associated access.
P14/V0576/O (Resolved to be granted 10 th September 2014).	Residential development comprising the erection of up to 72 dwellings including access.

These applications secure 201 new dwellings within this strategic allocation together with the formation of a formal vehicular access to the A338 which enables delivery of these two first phases. The access also facilitates vehicular access to the wider strategic allocation.

Response

The National Planning Policy Framework (NPPF) states, at Paragraph 47, the need for local planning authorities to *"boost significantly the supply of housing"*. In order to achieve this aim, paragraph 47 of the NPPF goes on to state that local planning authorities should *"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the market area"*.

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This position is re-iterated in the National Planning Practice Guidance (NPPG) published in March 2014 which states that *“the local plan should aim to meet the objectively assessed development needs of the area, including the unmet needs of neighbouring areas...”* (Reference 12-002-20140306).

At various Local Plan examinations, Inspectors have confirmed that in order to meet the aim of boosting significantly the supply of housing in an area that Councils should adopt the higher level of housing whenever a range is set out. Within Oxfordshire this position has been supported by the Inspector at the recent Cherwell Local Plan examination which was suspended in June 2014 to enable the Council to *“put forward proposed modifications to the plan involving increased new housing delivery over the plan period to meet the full, up to date, objectively assessed needs of the District as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA).”*

The Oxfordshire Strategic Housing Market Assessment (SHMA) published in March 2014 identifies a need for up to 20,560 new homes within the District over the period 2011 – 2031 (1,028 dwellings per annum). The emerging Local Plan takes full account of this requirement and we welcome the positive approach taken by the District Council. These dwellings are to be delivered through the implementation of a series of Sub-Area Strategies. Additional housing demand also arises from the housing need unable to be met within Oxford City Council.

We understand that work is currently ongoing to confirm how this housing need can be accommodated in the administrative areas surrounding Oxford, but is not currently included in the Local Plan. It is likely, therefore, that a review of the Local Plan will require an increase in housing numbers, and the Council should therefore consider any uplift in housing numbers within identified sites in a positive manner.

The emerging Local Plan promotes a strategy which directs the majority of growth towards the South East Vale Sub-Area. This is consistent with the approach that the Science Vale is allocated to grow a number of significant employment centres (paragraph 5.49). Core Policy 15: Spatial Strategy for South-East Vale Sub-Area seeks to secure 12,450 new dwellings to be delivered through the Plan period, of which 10,320 are secured through strategic allocations in the South East Vale Sub Area.

Core Policy 4: Meeting our Housing Needs identifies the scale and location of housing to be delivered through strategic sites (more than 200 dwellings) through the plan period. We welcome the continued support of land to the north of Grove. The consented schemes representing early phases of the north Grove allocation (listed above) have already secured access that enables further phases to come forward. The junction has been designed in such a way that it can be upgraded to serve the wider north Grove allocation and the Grove airfield site, and the first part of the Grove North Link Road (GNLR) has been designed to the standards required by the Highways Authority for the completed strategic road.

The strategic allocation was previously required to provide for a new primary school (2.2Ha for a 2 form entry school) . The development template included within Appendix A of this consultation document now requires contributions to be made towards expanding Grove Church of England Primary School. Land is also available for such expansion adjacent to the existing school site and discussions have taken place with Oxfordshire County Council who confirm that this approach would be suitable. Accordingly, a primary school will no longer be required within the main development area, and additional land is therefore available within the allocation for a further 75 houses approximately. We therefore request that the Council considers increasing the housing numbers in the allocation to 825 new dwellings.

In their report presented to the Vale of White Horse Planning Committee on 10th September 2014, Planning Officers regard the site as “...suitable and deliverable. The site is therefore considered to be potentially a highly sustainable location for development in economic and social terms, consistent with both the adopted Vale local plan 2011, the emerging Vale Local Plan 2031 part 1 and the NPPF.”

The Council's approach to Affordable Housing set out in Core Policy 24 is also supported.

Strategic Sites and Policies

Appendix A of the consultation document proposes a series of development templates for strategic sites identified within the emerging Local Plan, including for Land to the North of Grove (Appendix A page 43). We have previously made representations relating to the detail of some items within this development template. These comments in large part do not seem to have been taken into account and we urge reconsideration of these issues, as set out below.

Urban design principles

Many of these principles are either unnecessary, or replicate advice that is given in detail in the Residential Design Guide SPD, currently under consultation. It would be clearer for one reference to be made within the Local Plan to the need for proposals to consider this guidance, rather than replicating parts of the guidance in relation to individual sites.

For instance, the provision of 'perimeter blocks' included on p43 of Appendix A replicates p59 of the design guidance, which also lists why perimeter blocks should be used.

There is no evidence presented within the consultation documentation to suggest that the provision of buildings with heights in excess of 2.5 storeys in certain areas of the site would cause a detrimental impact to any of the surrounding areas. This detail should be determined through the planning application process in consultation with Officers.

The District Council's adopted Supplementary Planning Document (SPD): 'Open Space, Sport and Recreation Future Provision' provides for areas that are at risk of flooding to contribute towards the provision of recreational space. This is the case under planning application reference P14/V0576/O. It is too simplistic to remove 'odour buffers' and areas subject to noise from the provision of recreational space without first defining precisely what these impacts are. Work undertaken with Thames Water in 2013 to model odour from the Wantage Sewage Treatment Works (STW) confirms that playing fields and POS are acceptable within certain odour contours. There is no definition of a 'noise buffer' in the site development template, nor any reference to technical guidance or policy on noise. The detail in the development template is therefore not justified by a robust evidence base and the provision of open space should be dealt with at the planning application stage with the relevant statutory bodies.

Utilities

A requirement to 'upgrade the sewer network' is unreasonable, and is not supported by any evidence. Capacity modelling of the sewage system has already been undertaken to support planning permission P12/V1545/O and application P14/V0576/O. These assessments, undertaken in consultation with Thames Water, did not find evidence that the sewage system needed upgrading. Indeed, initial consultations have

confirmed that there is no capacity issue with foul sewers. This requirement in the development brief is therefore unnecessary. Full consultation is currently being undertaken with all statutory undertakers in preparation of a planning application.

Access and highways

Access from the A338 is already secured through planning permission P12/V1545/O, relevant legal agreements and approval of conditions. In any event access matters such as capacity and flows will be assessed during pre-application discussions. The requirement to "*investigate access arrangements*" is therefore unnecessary

It is recognised that the site will contribute towards wider infrastructure within the Science Vale, including provision of part of the Grove Northern Link Road (GNLR) itself. References to specific contributions are unnecessary as the provision of infrastructure is already referenced in the third bullet point under the heading 'Strategic Objectives'.

There is a typographic error in the third bullet point relating to the delivery of the GNLR. This bullet could also be re-written for additional clarity regarding the function of the GNLR. The following change is therefore suggested:

- Deliver part of the GNLR within the site boundary in an alignment and specification that is suitable for wider connection to the Grove Airfield allocation.

Contributions through Section 106 agreements are anticipated towards the wider footpath and cycle ways, and the delivery of a network of cycleways and footpaths within the site. The delivery of any improvements or additions to the wider cycle and pedestrian network (for instance to Grove village centre or the wider Science Vale area) is not under the control of the developer.

Environmental Health

As described above assessments have been undertaken with Thames Water that provide evidence which recommends recreation areas and POS are acceptable within certain areas with limited / intermittent odour levels from the sewage treatment works. The policy should be re-written to indicate a need for investigation of odour issues with the relevant statutory authorities.

Biodiversity and Green Infrastructure

The Letcombe Brook Project has requested a maximum of 3 crossings over the brook, but this needs to be assessed further in light of urban design requirements for permeability / accessibility. This bullet point should be modified to require testing of the number of crossings, to achieve a suitable balance between ecological impacts and permeability. The provision of a road bridge through Letcombe Brook will give rise to some impacts to the ecological corridor.

These will be mitigated through the provision of ecological mitigation measures, which might include restoration of the channel and surrounding habitats, amongst other measures yet to be discussed in detail and determined through relevant consultation. The wording should reflect this, such as: '*The main road bridge over the Letcombe Brook will need to be designed in conjunction with and consideration to mitigation measures that will reduce the ecological impact of the bridge*'.

Flood Risk and Drainage

As stated above, the Council's SPD "Open Space, Sport and Recreation Future Provision" allows for MFGS within areas within the flood plain, as incorporated into the open space provision for application P14/V1545/O. We request that the Council reconsiders their position that no development can take place in these areas, and instead provides for certain recreation and open space land uses.

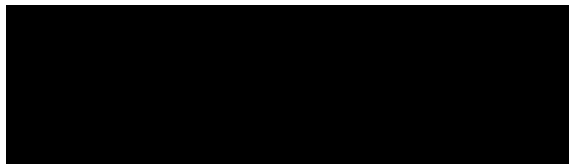
Conclusion

We are pleased that the District Council is now at such an advanced stage of production of the Local Plan Part 1. It accords with the principles of the NPPF in that it will boost significantly the supply of housing in the District. We feel that the overall aim of the development template should be supported. With the minor amendments set out above, the allocation could be increased to 825 units together with 6ha of employment.

We attach the latest illustrative masterplan for the site. We have previously shared the detailed surveys with the Council that have been carried out in relation to the site. We attach a summary of the technical work carried out to date, the conclusions, and the technical work currently underway that is informing the preparation of further masterplanning work. Gallagher-Gleeson intends to consult widely on the proposals in the first part of 2015, with the intention of submitting an outline planning application by the Summer of 2015.

We look forward to receiving confirmation that this representation has been received.

Yours faithfully

A large black rectangular redaction box covering the signature area.

James Stewart-Irvine MSc MRTPI
Associate Planner

cc. J. J. Gallagher Ltd
M. J. Gleeson

Technical Assessments update

Report	Consultant	Summary findings
Phase 1 Habitat Surveys	HDA	Phase 1 & 2 Surveys Complete. Bat surveys Complete – activity confined to Letcombe Brook corridor. Reptiles – Surveys completed September 2014 – low numbers of common lizard and grass snake. Remaining surveys to be completed in appropriate season, beginning early 2015.
Trees		Few good quality trees. Most are within category B and C. Best quality trees to be retained wherever possible.
Landscape and Visual Impact		The site is well-contained and does not give rise to any significant impacts from nearby receptors, e.g. A338.
Transport	SBA / Halcrow	New access to be created with A338 under planning permission P12/V1545/O. Applicant has entered into Section 278 legal agreement. Reserved matters application for the internal road layout is currently undergoing consultation (reference P14/V2499/RM). Full TA expected early-mid 2015, already assessed as part of sensitivity testing for initial phases. Alignment of GNLR and crossing of Letcombe Brook agreed in principle with EA and Highways Authority. Crossing of BOAT agreed in principle with County PROW officers. Consultation early 2015.
Contamination	Wardell-Armstrong	No evidence of land contamination at the site.
Noise		Assessments undertaken to support the first two phases suggests noise-sensitive areas within the site adjacent to the GNLR, railway and Bellinger's garage. Appropriate mitigation to be implemented. Final surveys to be completed early 2015.
Air Quality		Assessments indicate that traffic will have a negligible impact. Odour assessment indicates areas where recreation facilities are acceptable. Development areas agreed with Thames Water via Odournet.
Archaeology	CgMS	Further archaeological works to be undertaken by condition where necessary. Agreements with County Archaeologist to be completed in early 2015.
Heritage	Savills	Listed buildings at Monk's Farm key consideration and assessment of their setting is influencing the wider masterplan. Initial assessment carried out. Final impact assessment following masterplan due mid 2015.
Foul Water, Surface Water and Flood Risk Assessment	Halcrow	Development is located outside of the flood plain. Opportunities to reduce flood risk downstream. Attenuation techniques employed to control discharge into watercourses. Final strategy for drainage to be completed with masterplanning during early-mid 2015. Water quality monitoring ongoing.