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Your ref:  
Our ref: IMG/csw/1068207

19<sup>th</sup> December 2014

Dear Sirs

## **VALE OF WHITE HORSE LOCAL PLAN (Part 1) REPRESENTATION ON BEHALF OF MR AND MRS C F LAY AND MR AND MRS N G LAY**

### **1. INTRODUCTION**

- 1.1 This representation is prepared and submitted by Carter Jonas on behalf of Mr and Mrs C F Lay and Mr and Mrs N G Lay in respect of the allocation of the site known as East of Harwell Campus [hereafter referred to as East Harwell] for residential development of around 850 dwellings in the Publication Version of the Vale of White Horse Local Plan Part 1.
- 1.2 Mr and Mrs C F Lay and Mr and Mrs N G Lay own the significant majority of the land the subject of the allocation.
- 1.3 The focus of this representation is on the deliverability of East Harwell and the contribution it can make towards meeting the housing and other needs of the Vale. The landowners will shortly be in a position to confirm their preferred development partner, and are committed to working with the District Council, County Council and other stakeholders to ensure the timely delivery of a comprehensive and high quality scheme on the East Harwell land.

### **2. LOCAL PLAN (PART 1) STRATEGIC COMMENTS**

#### **2.1 Housing Need**

- 2.1.1 Objectively Assessed Needs: Para 47 of the NPPF requires Local Plans to meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area. The presumption in favour of sustainable development within the NPPF (para 15) sets out that plans should be based on meeting the need identified in full, where it is sustainable to do so.
- 2.1.2 The District Council's OAN are considered in the Oxfordshire Strategic Housing Market Assessment Final Report dated April 2014 (SHMA). This identifies a need for 20,560 homes in Vale of White Horse District in the period up to 2031 to support committed economic growth, deliver the affordable housing needed in the District and support the expected growth in population and households.

- 2.1.3 The Local Plan housing target set out in draft Core Policy 4 (at least 20,560 dwellings in the period 2011-31) commits the Council to meeting in full the OAN for the Vale of White Horse.
- 2.1.4 **We welcome and fully support the Council’s proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore (as set out in more detail below) we support the District Council’s pragmatic approach to addressing any unmet needs arising elsewhere in the Oxfordshire Housing Market Area.**
- 2.1.5 **We also support the need to create a balance between employment and homes and for the proposed housing requirement to be predicated upon the significant number of jobs likely to be created in the District. This level of housing provision is necessary to support committed economic growth and the delivery of a full range of housing types.**
- 2.1.6 Affordable Housing: The NPPF requires Local Plans to meet the full OAN for market and affordable housing (para 47). The Oxfordshire wide SHMA indicates a need for 273 new affordable dwellings per annum in the Vale of White Horse.
- 2.1.7 Draft Core Policy 24 (Affordable Housing) proposes 35% affordable housing provision on all sites capable of a net gain of three or more dwellings (sites of at least 0.1 hectare), and a 75:25 split for rented and intermediate housing respectively. The draft Policy also makes provision for a different tenure mix or percentage of affordable housing – where viability issues are evidenced.
- 2.1.8 We concur with the Council’s view that lowering the percentage of affordable housing on qualifying sites to 35% will increase the cushion between the viability threshold and residual value, whilst still ensuring that the OAN for affordable housing can be met in full. Indeed, there is sufficient headroom in the Council’s approach to allow for some sites to come forward with a lower percentage of affordable housing (i.e. less than 35%) and still meet the overall OAN for affordable housing.
- 2.1.9 **We support draft Core Policy 24 (Affordable Housing), which seeks 35% affordable housing on eligible sites and makes provision for a different mix or percentage of affordable housing where supported by viability evidence. The flexibility set out in the Plan will help to ensure that irrespective of changing circumstances or additional issues, the strategic sites will be deliverable.**
- 2.1.10 **We have commented separately (see below) on the site infrastructure requirements under S106 (as set out in the Infrastructure Delivery Plan).**
- 2.1.11 Duty to Cooperate: Where a Council is unable to meet all of its own identified housing need, it is required by legislation (the 2011 Localism Act) and Policy (NPPF paragraphs 178-182) to work with adjoining local authorities to consider where any shortfall can be met.
- 2.1.12 Draft Core Policy 2 (Cooperation on Unmet Housing Need for Oxfordshire) sets out how the Council intends to continue to fulfill its statutory duty to co-operate. The draft Policy recognises that Oxford City may not be able to accommodate its own objectively assessed housing needs for the period 2011-2031 within its administrative boundary. Further work is needed to consider the extent to which Oxford City can meet its own needs and whether any unmet need should be accommodated within Vale of White Horse. This will involve the testing of spatial options and a full strategic review of the whole of the Oxford Green Belt.

- 2.1.13 We support this on-going joint working with the other Oxfordshire local authorities, and importantly, the Vale of White Horse District Council's commitment to the process.
- 2.1.14 However, it is important to be realistic about the timeframe for reaching agreement on –
- The extent of the unmet need to be accommodated beyond the administrative boundary of Oxford City;
  - The methodology for the strategic review of the Green Belt; and
  - The implications of the above and the extent of the unmet Oxford City housing need to be accommodated in each of the adjoining local planning authority areas.
- 2.1.15 In the context of the above and the pressing need for the Vale of White Horse District Council to meet its own housing needs as quickly as possible, we believe that it is essential that the Local Plan (Part 1) is progressed without delay. There would be no merit in the Vale of White Horse District Council awaiting completion of the process outlined at paragraph 2.1.14 above - as this would risk significantly delaying progress in meeting the OAN for the Vale of White Horse.
- 2.1.16 We endorse the commitment in draft Core Policy 2 to undertake a full or partial review of the Local Plan 2031, or to allocate sites through a subsequent DPD, should there be a requirement to meet any Oxford City unmet housing need within the District.
- 2.1.17 **We strongly support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs, whilst simultaneously working with the other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area.**

## 2.2 The Spatial Strategy and Sub Area Strategies

- 2.2.1 The NPPF sets out a presumption in favour of sustainable development. It states that the Government expects the planning system to do *'everything it can to support sustainable economic growth'* (Paragraph 19). It also outlines the advantages of ensuring that assessment of, and strategies for, housing, employment and other uses are integrated and that they take full account of relevant market and economic signals (paragraph 158).
- 2.2.2 The Government's National Planning Policy Guidance (NPPG) advises that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.
- 2.2.3 The draft Local Plan seeks to deliver sustainable growth in accordance with its Spatial Strategy. One of the strategy's three key strands is to focus sustainable growth within the Science Vale area. This includes allocating appropriate land for strategic housing growth to help improve the self-containment of the area.
- 2.2.4 Draft Core Policy 4 (Meeting Our Housing Needs) proposes the delivery of over 10,000 dwellings within the South East Vale Sub-Area. This Sub-Area is the focus of the Council's proposals for new housing and will accommodate around 60% of the total planned and permitted new housing in the District. East Harwell is allocated for about 850 dwellings.

- 2.2.5 Draft Core Policy 5 (Housing Supply Ring-Fence) proposes to ring-fence housing delivery in key locations in Science Vale to concentrate housing growth and infrastructure investment in this location and to reinforce the Council's commitment to the Spatial Strategy. This will also improve the Council's ability to seek external funding to support infrastructure delivery.
- 2.2.6 Draft Core Policy 15 (Spatial Strategy for South East Vale Sub-Area) emphasises the Council's commitment to aligning housing and employment growth with the infrastructure needed to deliver sustainable development.
- 2.2.7 The Harwell Campus is a key strategic site identified under draft Core Policy 6 (Meeting Business and Employment Needs). It will make a significant contribution to the Council's future employment requirements over the Plan period. Indeed, taken together, land at Harwell and Milton Park provide the majority of the land identified for employment growth in the District.
- 2.2.8 The position in Vale of White Horse District (and adjoining Districts) is relatively unique – in that there is a strong commitment to economic growth, and a key driver for the amount of new housing in the District is to support sustained economic growth. In delivering sustainable communities we believe that it is imperative that housing is located as close as possible to the centres of economic development. At present, the centres of innovation within Science Vale are relatively isolated from areas of housing – with the Harwell Campus served by just 300 homes.
- 2.2.9 Providing new homes adjacent to an established centre of excellence for research and innovation (which provides an increasingly large range of employment opportunities) creates an unrivalled opportunity to deliver sustainable economic growth, to reduce car journeys, to provide a full mix of housing types and to embody the best principles of place making. Working in partnership with the local authority and business communities there are also opportunities to deliver planned infrastructure improvements and to enhance public transport links.
- 2.2.10 Developing adjacent to Harwell Oxford provides the opportunity to relieve the pressure for development adjacent to smaller and/or less sustainable settlements elsewhere within the District.
- 2.2.11 **We strongly support the proposed Spatial Strategy and Sub-Area Strategy, which seek to align the scale and distribution of new employment and housing growth. We believe the Local Plan strategy accords with the Government's drive for delivering sustainable development.**
- 2.2.12 **We support the Council's approach of accommodating a large proportion of the area's future employment and housing in the South East Vale Sub-Area. This is considered to be a sustainable development option that can deliver integrated housing growth and economic development - given that the focus of the District's future economic growth is heavily centred in this area and having regard to its international significance.**
- 2.2.13 **The allocation of East Harwell for around 850 dwellings is fully supported and accords with national policy and the Council's Spatial Strategy and Sub-Area Strategy.**
- 2.2.14 Draft Core Policy 3 (Settlement Hierarchy) categorises settlements across the District into four tiers (Market Towns, Local Service Centres, Larger Villages and Smaller Villages), each of which has a different strategic role. Harwell Campus is proposed to be classified as a Larger Village. Larger Villages are described as settlements with a more limited range of employment, services and facilities.

- 2.2.15 Local Service Centres are the next tier up in the Council's proposed settlement hierarchy. These are described as Larger Villages with a level of facilities, services and local employment to provide the next best opportunities for sustainable development outside the Market Towns.
- 2.2.16 **We would agree, that as a minimum, the range of services, facilities and employment opportunities at the Harwell Campus suggest it should be classified as a Larger Village. However, the existing employment opportunities at Harwell Campus cannot be described as 'more limited in range', and indeed, further employment provision at the Harwell Campus is proposed by draft Core Policy 6 (Meeting Business and Employment Needs). The proposed housing allocations at Harwell Campus will also provide new primary education facilities, public open space and recreational facilities. Linkages to the employment site for pedestrians, cyclists and public transport users will also be provided (as required by the Development Site Templates at Appendix A to the draft Local Plan). As such we consider that there is strong justification for the Harwell Campus to be classified as a Local Service Centre.**
- 2.2.17 The need for strategic highway improvements to deliver the growth proposed in the South East Vale Sub-Area is recognised. The landowners and their development partner will work with the Council and other Stakeholders to ensure that the infrastructure required and included within draft Core Policies 7 (Providing Supporting Infrastructure and Services) and 17 (Delivery of Strategic Highway Improvements within the South East Vale Sub-Area) is delivered.
- 2.2.18 **We support the proposed preparation of the Science Vale Area Action Plan as a means of promoting the international significance of Science Vale as a location for research and innovation and of ensuring that growth in the area is delivered effectively and sustainably. Adopting a joint approach with South Oxfordshire District Council and Oxfordshire County Council in the preparation of the Action Plan is welcomed as a means of coordinating the delivery of housing, jobs and infrastructure across Oxfordshire.**
- 2.3 Landscape Impact
- 2.3.1 The proposed site allocation falls within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), a nationally designated area. Paragraph 115 of the NPPF states that: '*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.*'
- 2.3.2 Paragraph 116 further states that: '*Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*
- *the need for the development, including in terms of any national considerations,- the impact of permitting it, or refusing it, upon the local economy;*
  - *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
  - *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*
- 2.3.3 The Council's Statutory Duty is set out in Section 85 of the Countryside and Rights of Way

Act 2000, which requires that: *'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall **have regard** to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'* [our emphasis]

- 2.3.4 The Vale of White Horse Harwell Campus Landscape Study: July 2014, is a landscape and visual appraisal of the land surrounding Harwell Campus and assesses the relative capacity of parcels of land surrounding the Harwell Campus to accommodate future residential development in landscape terms.
- 2.3.5 The Study considers that developing parts of the land surrounding the Harwell Campus may have less significant impacts than others and notes the role that landscape mitigation can play. The land allocated at East Harwell in the publication version of the Local Plan (Part 1) is one of the least sensitive areas and the identified mitigation measures can be delivered on land under the control of Mr and Mrs C F Lay and Mr and Mrs N G Lay.
- 2.3.6 During the course of any future planning application a landscape and visual impact assessment will be undertaken, which may include further mitigation refinements.
- 2.3.7 **We support the Council's proposal to allocate land at East Harwell for about 850 dwellings – based upon the Landscape Study evidence. Proposed development could be accommodated on the least sensitive parts of the land around the Harwell Campus (with scope to deliver appropriate landscape mitigation). Land can also be made available for informal open space and on-site school provision to serve the development, in accordance with the Council's Infrastructure Delivery Plan.**
- 2.3.8 We are committed to delivering a high quality development which has regard to its position in the AONB, and to providing appropriate mitigation to minimise landscape impact.
- 2.3.9 **We recognise the importance of landscape masterplanning and urban design in this location and support the Council's aspirations to deliver exemplary modern design with a unique design response. We are committed to ensuing development positively contributes to the wider objectives of Science Vale and look forward to working with the Council and other stakeholders to deliver an exceptional scheme.**
- 2.3.10 We consider there to be a strong economic case, in the national interest, for delivering planned major development in the AONB. This is particularly the case given the opportunities that exist for landscape mitigation.
- 2.3.11 The proposed allocation is considered to be entirely necessary and justified in sustaining and supporting the continued growth of a renowned economic centre of excellence. To create a sustainable community and to support economic growth, as well as to provide important infrastructure and supporting facilities, further development is required.
- 2.3.12 The delivery of a new sustainable, residential-led community to serve Harwell and support its future growth is undoubtedly in the national interest. As acknowledged by both the Government and the local authority, Harwell Oxford Campus is of regional, national and international significance – as a centre for innovative research and development in the science-based industries. Its importance is backed by Government initiatives and funding.
- 2.3.13 We further note that paragraph 13.3.6 of the Council's Sustainability Appraisal reaches a similar conclusion to the assessment outlined above - noting that the Council believes that the international significance of the Harwell Campus provides a uniquely exceptional circumstance to justify supporting further development in this AONB location.

2.3.14 **We consider that there are exceptional circumstances justifying major development in the AONB around the Harwell Campus. In particular, the development will help sustain and enhance a centre of international significance for research and development in the science-based industries.**

#### 2.4 Infrastructure Requirements and Viability

2.4.1 The Council's Infrastructure Delivery Plan (IDP) (October 2014) identifies the infrastructure necessary to support the delivery of the Local Plan 2031 Part 1. It supports draft Core Policy 7 which requires new development to provide for the necessary infrastructure requirements of a proposal

2.4.2 The IDP is a high level summary of the essential infrastructure needed. The requirements are not exhaustive.

2.4.3 The Local Plan Viability Study considers the viability of the Local Plan and the strategic allocations, taking account of the IDP. The provision of essential infrastructure has been considered in viability terms (though preparation of the Local Plan and related evidence base), and therefore in our view, clause iii of draft Core Policy 7 is unnecessary.

2.4.4 Furthermore, in those circumstances where viability constraints are identified, the Council should make it clear how draft Core Policies 7 and 24 (Affordable Housing) will 'interact'. The Council makes provision for changes to the levels and tenure of affordable housing and for concessions to be made in relation to infrastructure provision (in terms of Place Shaping Infrastructure) – but there is no guidance on whether matters will be dealt with on a case by case basis, or whether the Council intends to operate some form of 'cascade' approach.

2.4.5 Not all the infrastructure requirements are included in the IDP. Most notably, Oxfordshire County Council (non highway) Health, Emergency Services and Thames Valley Police requirements. Further consultation with all interested agencies should continue to ensure the IDP is as comprehensive as possible. It is assumed that these will be funded by CIL rather than S106 obligations.

2.4.6 **Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision - where a development is demonstrated to be unviable.**

### 3 LOCAL PLAN (PART 1) SITE SPECIFIC COMMENTS

#### 3.1 Land at East Harwell - Opportunities

3.1.1 The site is ideally located between the Harwell Campus to the west and the A34 to the east, with the A4185 running through the centre. The A4185 runs north south connecting to the A417 near Harwell village and the A34 to the south giving good connection to the North and with easy access to the wider trunk road network via the A34.

3.1.2 The north facing slip roads onto the A34 at Chilton are now committed and design/ construction will start in 2015 - relieving pressure on the rural road network and improving all access movement between the A34 and A4185.

- 3.1.3 There are good existing bus links to and from Didcot, Wantage, Oxford and Abingdon through Harwell village past the Harwell Oxford Campus.
- 3.1.4 The strategic cycle network runs east west through the centre of the site making this site ideally placed to promote sustainable forms of movement.
- 3.1.5 A public footpath runs along the northern site boundary and opportunities will be taken to provide a network of footpaths to the Campus, local facilities and the countryside.
- 3.1.6 There are opportunities to provide significant Green Infrastructure and structural landscaping in accordance with draft Core Policy 45 (Green Infrastructure) and to ensure that the site is well contained by permanent and defensible boundaries.
- 3.1.7 There are opportunities for biodiversity gains in accordance with draft Core Policy 46 (Conservation and Improvement of Biodiversity).
- 3.1.8 **The development of this site represents a unique opportunity to deliver sustainable growth and will comprise a well-planned, high quality, campus style development with good links to existing, and expanding, employment facilities by a range of means and will provide a clear, defensible edge to the settlement through appropriate masterplanning and landscaping.**

### 3.2 Land at East Harwell - Constraints

- 3.2.1 In respect of landscape impact the Council's evidence base indicates that development at East Harwell can be accommodated with appropriate mitigation ( as an exceptional circumstance). Mitigation measures will be addressed through the master planning of the site.
- 3.2.2 The Site is located in Flood Zone 1 and therefore is at low risk of flooding.
- 3.2.3 The land is not considered to pose any significant constraints in respect of hazardous risks, pollution or contamination.
- 3.2.4 There are no known ecological or biodiversity constraints to the development of the land and the development will bring about opportunities for significant enhancements to the natural environment.
- 3.2.5 The proposed allocation provides a substantial degree of separation from the A34, particularly by restricting development towards the west of the allocation. Applications will be supported by further detailed noise and air quality assessments which will inform any further mitigation measures that may be necessary.
- 3.2.6 In terms of infrastructure constraints the most notable is in respect of the water network/sewerage capacity as evidenced by the Water Cycle Study. We are committed to working with the Council, Thames Water and the Environment Agency to find an acceptable and timely way forward.
- 3.2.7 **In summary, we strongly believe that the East Harwell site is suitable for development and deliverable, with no insurmountable policy or technical constraints.**

### 3.3 Land at East Harwell - Development Principles

- 3.3.1 Taking into account the above opportunities and constraints it is clear that the site is capable of being developed in accordance with the Development Site Templates at **Appendix A**.
- 3.3.2 Appropriate landscaping and Green Infrastructure to comply with the Strategic Site Development Templates (**Appendix A**) and Landscape Study can be provided.
- 3.3.3 The site can be developed in accordance with draft Core Policy 37 (Design and Local Distinctiveness) and the Council's design aspirations. We are fully committed to working with the Council to deliver an exemplar development that responds positively to the site and its surroundings. We recognise the importance of the site's unique setting and that it demands the highest standards of landscape masterplanning and urban design.
- 3.3.4 An appropriate mix of housing types and sizes can be provided to meet the identified housing need and to accord with draft Core Policy 22 (Housing Mix).
- 3.3.5 An appropriate density can be provided across the site which will reflect local context and landscape character whilst also making optimum use of land and creating a high quality public realm in accordance with draft Core Policy 23 (Housing Density).
- 3.3.6 **In terms of development capacity we are confident that the site can accommodate at least 850 dwellings without conflicting with the Site Development Templates, the Infrastructure Delivery Plan, proposed draft Core Policy 38 (Design Strategies for Strategic and Major Development Sites) or the draft Housing Density Policy (Core Policy 23).**

### 3.4 Site Specific Infrastructure

- 3.4.1 Significant funding has already been secured for a number of the improvements works set out in the Council's IDP. This is to be supplemented where necessary by developer contributions and/or CIL.
- 3.4.2 **We are committed to ensuring that the necessary infrastructure is in place to support development at East Harwell. No 'showstoppers' in respect of infrastructure requirements have been identified, and we will work with infrastructure providers and the Council to secure the timely delivery of necessary supporting infrastructure.**
- 3.4.3 **The East Harwell site is considered to be generally viable with the essential infrastructure identified in the current version of the IDP, the Strategic Site Development Templates, CIL as currently proposed and 35% on site affordable housing provision. However, this situation will need to be kept under review as the site progresses and cost estimates and values are refined – and we therefore welcome the flexibility afforded in draft Core Policies 7 and 24.**
- 3.4.4 **In our view the primary education contributions (via S106) need to be re-calculated. The East Harwell allocation is currently shown as paying the same financial contribution as North West of Harwell Campus and yet East Harwell is also burdened with providing the land for the new school. The 'gifting' of the land needs to be factored into the financial contribution sought from the East Harwell scheme (and the sums in the IDP re-calculated accordingly).**

3.4.5 Upon discussions with the Council, it is understood that Police services and emergency services will be funded through CIL and not S106. It is understood that these will constitute 'Other Social and Community Facilities' on the CIL Regulation 123 List. Explicit reference should be made to these in the List for the avoidance of doubt.

### 3.5 Deliverability

3.5.1 The East Harwell site is in the predominate ownership of the Lay family and is available for delivery within the current Plan period.

3.5.2 The landowners will shortly be in a position to confirm their preferred development partner, and are committed to working with the District Council, County Council and other stakeholders to ensure the timely delivery of a comprehensive and high quality scheme on the East Harwell land.

### 3.6 Strategic Site Development Templates (Appendix A) comments

3.6.1 There are some requirements (in sections 2 and 4) where the requirement is absolute rather than qualified by the addition of wording to the effect of 'where necessary/ required'. All contributions or infrastructure provision should be qualified by 'where required'.

3.6.2 Environmental Impact Assessments, Heritage Statements, Impact Assessments and Conservation Area Appraisals should only be undertaken where appropriate. These are not all required for all allocations.

3.6.3 The site specific requirements in section 4 refer to provision of a Police presence on site but this is not included in the Regulation 123 List, nor in the IDP. There does not appear to be evidence in support of this requirement and therefore it should not be included as a site specific requirement.

3.6.4 The site specific requirements in Section 4 (page 35) have as a key objective the need to contribute towards infrastructure as set out in the Oxfordshire Local Transport Plan. Section 2 of Appendix A (General Requirements For All Housing Site Allocations) states that, subject to viability testing, development will be required to contribute to the delivery of strategic transport infrastructure measures, where required.

3.6.5 The IDP proposes that all contributions towards the Science Vale Transport Package will be made via CIL. This should be made clear in Appendix A.

3.6.6 The site specific requirements in Section 4 (page 35) have as a key objective the need to provide or support additional high quality facilities to complement those already on the Campus. It is unclear what these facilities are. The infrastructure needed to support the development is set out in the IDP. Further clarity is needed.

3.6.7 The site specific requirements in Section 4 (page 36) state that only the western part of the site is suitable for built development but that the eastern part 'may' be suitable for a school and open space. Firstly, this is contradictory and should be re-phrased (i.e. a school would be built development). Secondly, it should be made clear that the eastern part of the site 'is' suitable for a school and open space to support the site capacity. Section 2 includes the need for applications to be supported by a Landscape and Visual Impact Assessment, which will address the siting and design of the school and associated landscape and visual impact.

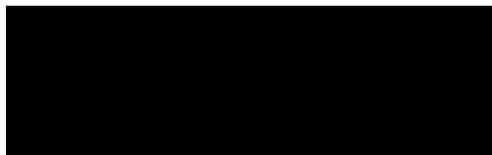
- 3.6.8 The site specific requirements in Section 4 (page 36) require the proportion of public open space to be higher than 'normal' requirements. Yet it also states that development should provide public open space and recreational facilities in accordance with the Vale's emerging playing pitch strategy and the emerging Science Vale Area Action Plan. This is contradictory and unclear. Further clarity is needed.

#### **4 SUMMARY AND CONCLUSIONS**

- 4.1 We have completed a separate representation form for each of our comments set out above (see **Appendix A**). In summary terms:
- 4.2 The allocation of East Harwell for around 850 dwellings is fully supported.
- 4.3 We welcome and fully support the Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore, we fully support the need to create a balance between employment and homes and for the proposed housing requirement to be predicated upon the significant number of jobs likely to be created in the District.
- 4.4 We strongly support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs, whilst simultaneously working with the other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area
- 4.5 We support the proposed Spatial Strategy and Sub-Area Strategy, which seek to align the scale and distribution of new employment and housing growth.
- 4.6 We support draft Core Policy 24 (Affordable Housing). The flexibility set out in the Plan will help to ensure that irrespective of changing circumstances or additional issues, the strategic sites will be deliverable.
- 4.7 We consider that there is strong justification for the Harwell Campus to be classified as a Local Service Centre.
- 4.8 We support the proposed preparation of the Science Vale Area Action Plan.
- 4.9 We recognise the importance of landscape masterplanning and urban design in this location and support the Council's aspirations to deliver exemplary modern design with a unique design response. We are committed to working with the District Council, County Council and other stakeholders to ensure the timely delivery of a high quality scheme on the East of Harwell Campus land.
- 4.10 We believe that there are exceptional circumstances justifying major development in the AONB around the Harwell Campus.
- 4.11 We are confident that the site can accommodate at least 850 dwellings.
- 4.12 We are committed to ensuring that the necessary infrastructure is in place to support development at East Harwell. No 'showstoppers' in respect of infrastructure requirements have been identified and we will work with the Council and infrastructure providers to secure the timely delivery of necessary supporting infrastructure.

- 4.13 The East Harwell site is considered to be generally viable with the essential infrastructure identified in the current version of the IDP, the Strategic Site Development Templates, CIL as currently proposed and 35% on site affordable housing provision. However, this situation will need to be kept under review and we therefore welcome the flexibility afforded in draft Core Policies 7 and 24.
- 4.14 Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision- where a development is demonstrated to be unviable.
- 4.15 We strongly believe that the East Harwell site is suitable for development and deliverable, with no insurmountable policy or technical constraints

Yours faithfully



**Ian Gillespie MRTPI**  
**Partner**

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## **APPENDICES**

**Appendix A – Representation Forms**

**Appendix A**

Representation Forms



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

Duty to Cooperate: Where a Council is unable to meet all of its own identified housing need, it is required by legislation (the 2011 Localism Act) and Policy (NPPF paragraphs 178-182) to work with adjoining local authorities to consider where any shortfall can be met.

Draft Core Policy 2 (Cooperation on Unmet Housing Need for Oxfordshire) sets out how the Council intends to continue to fulfill its statutory duty to co-operate. The draft Policy recognises that Oxford City may not be able to accommodate its own objectively assessed housing needs for the period 2011-2031 within its administrative boundary. Further work is needed to consider the extent to which Oxford City can meet its own needs and whether any unmet need should be accommodated within Vale of White Horse. This will involve the testing of spatial options and a full strategic review of the whole of the Oxford Green Belt.

We support this on-going joint working with the other Oxfordshire local authorities, and importantly, the Vale of White Horse District Council's commitment to the process.

However, it is important to be realistic about the timeframe for reaching agreement on –

- The extent of the unmet need to be accommodated beyond the administrative boundary of Oxford City;
- The methodology for the strategic review of the Green Belt; and
- The implications of the above and the extent of the unmet Oxford City housing need to be accommodated in each of the adjoining local planning authority areas.

In the context of the above and the pressing need for the Vale of White Horse District Council to meet its own housing needs as quickly as possible, we believe that it is essential that the Local Plan (Part 1) is progressed without delay. There would be no merit in the Vale of White Horse District Council awaiting completion of the process outlined above - as this would risk significantly delaying progress in meeting the OAN for the Vale of White Horse.

We endorse the commitment in draft Core Policy 2 to undertake a full or partial review of the Local Plan 2031, or to allocate sites through a subsequent DPD, should there be a requirement to meet any Oxford City unmet housing need within the District.

**We strongly support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs, whilst simultaneously working with the other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area.**

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

N/A

**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.

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**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:

We represent the landowners that control the significant majority of the proposed East Harwell allocation. We wish to participate at the oral part of the Examination to support the Council in demonstrating the soundness of the Local Plan and the deliverability of the East Harwell allocation.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

19/12/14



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

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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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## Part B – Please use a separate sheet for each representation

Name or Organisation : MR &MRS CF and NG LAY

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

Draft Core Policy 3 (Settlement Hierarchy) categorises settlements across the District into four tiers (Market Towns, Local Service Centres, Larger Villages and Smaller Villages), each of which has a different strategic role. Harwell Campus is proposed to be classified as a Larger Village. Larger Villages are described as settlements with a more limited range of employment, services and facilities.

Local Service Centres are the next tier up in the Council's proposed settlement hierarchy. These are described as Larger Villages with a level of facilities, services and local employment to provide the next best opportunities for sustainable development outside the Market Towns.

**We would agree, that as a minimum, the range of services, facilities and employment opportunities at the Harwell Campus suggest it should be classified as a Larger Village. However, the existing employment opportunities at Harwell Campus cannot be described as 'more limited in range', and indeed, further employment provision at the Harwell Campus is proposed by draft Core Policy 6 (Meeting Business and Employment Needs). The proposed housing allocations at Harwell Campus will also provide new primary education facilities, public open space and recreational facilities. Linkages to the employment site for pedestrians, cyclists and public transport users will also be provided (as required by the Development Site Templates at Appendix A to the draft Local Plan). As such we consider that there is strong justification for the Harwell Campus to be classified as a Local Service Centre.**

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

**We consider that there is strong justification for the Harwell Campus to be classified as a Local Service Centre.**

***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.***

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

Yes, I wish to participate at the oral examination

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Signature:

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date:

19/12/14

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## 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.*

Title	MR AND MRS
First Name	C F and N G
Last Name	LAY
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address (where relevant)	

### 2. Agent's Details (if applicable)

Mr
Ian
Gillespie
Partner
Carter Jonas LLP
Mayfield House
256 Banbury Road
Summertown
Oxford
OX2 7DE

## 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

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

Objectively Assessed Needs: Para 47 of the NPPF requires Local Plans to meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area. The presumption in favour of sustainable development within the NPPF (para 15) sets out that plans should be based on meeting the need identified in full, where it is sustainable to do so.

The District Council's OAN are considered in the Oxfordshire Strategic Housing Market Assessment Final Report dated April 2014 (SHMA). This identifies a need for 20,560 homes in Vale of White Horse District in the period up to 2031 to support committed economic growth, deliver the affordable housing needed in the District and support the expected growth in population and households.

The Local Plan housing target set out in draft Core Policy 4 (at least 20,560 dwellings in the period 2011-31) commits the Council to meeting in full the OAN for the Vale of White Horse.

**We welcome and fully support the Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore (as set out in more detail below) we support the District Council's pragmatic approach to addressing any unmet needs arising elsewhere in the Oxfordshire Housing Market Area.**

**We also support the need to create a balance between employment and homes and for the proposed housing requirement to be predicated upon the significant number of jobs likely to be created in the District. This level of housing provision is necessary to support committed economic growth and the delivery of a full range of housing types.**

The draft Local Plan seeks to deliver sustainable growth in accordance with its Spatial Strategy. One of the strategy's three key strands is to focus sustainable growth within the Science Vale area. This includes allocating appropriate land for strategic housing growth to help improve the self-containment of the area.

**We strongly support the proposed Spatial Strategy and Sub-Area Strategy, which seek to align the scale and distribution of new employment and housing growth. We believe the Local Plan strategy accords with the Government's drive for delivering sustainable development.**

**We support the Council's approach of accommodating a large proportion of the area's future employment and housing in the South East Vale Sub-Area. This is considered to be a sustainable development option that can deliver integrated housing growth and economic development - given that the focus of the District's future economic growth is heavily centred in this area and having regard to its international significance.**

**The allocation of East Harwell for around 850 dwellings is fully supported and accords with national policy and the Council's Spatial Strategy and Sub-Area Strategy.**

**We consider that there are exceptional circumstances justifying major development in the AONB around the Harwell Campus. In particular, the development will help sustain and enhance a centre of international significance for research and development in the science-based industries.**

The full merits of the proposed allocation at East Harwell Campus are addressed in the covering letter that accompanies this representation.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

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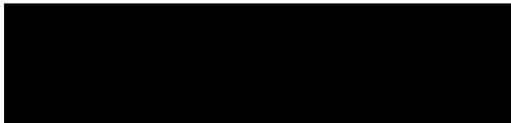
Yes, I wish to participate at the oral examination

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## Part A

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First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

The Council's Infrastructure Delivery Plan (IDP) (October 2014) identifies the infrastructure necessary to support the delivery of the Local Plan (Part 1). It supports draft Core Policy 7 (Providing Supporting Infrastructure and Services) which requires new development to provide for necessary supporting infrastructure.

The IDP is a high level summary of the essential infrastructure needed. The requirements are not exhaustive.

The Local Plan Viability Study considers the viability of the Local Plan and the strategic allocations, taking account of the IDP. The provision of essential infrastructure has been considered in viability terms (through preparation of the Local Plan and related evidence base), and therefore in our view, clause iii of draft Core Policy 7 is unnecessary.

Furthermore, in those circumstances where viability constraints are identified, the Council should make it clear how draft Core Policies 7 and 24 (Affordable Housing) will 'interact'. The Council makes provision for changes to the levels and tenure of affordable housing and for concessions to be made in relation to infrastructure provision (in terms of Place Shaping Infrastructure) – but there is no guidance on whether matters will be dealt with on a case by case basis, or whether the Council intends to operate some form of 'cascade' approach.

Not all the infrastructure requirements are included in the IDP. Most notably, Oxfordshire County Council (non highway) Health, Emergency Services and Thames Valley Police requirements. Further consultation with all interested agencies should continue to ensure the IDP is as comprehensive as possible. It is assumed that these will be funded by CIL rather than S106 obligations.

**We are committed to ensuring that the necessary infrastructure is in place to support development at East Harwell. No 'showstoppers' in respect of infrastructure requirements have been identified, and we will work with infrastructure providers and the Council to secure the timely delivery of necessary supporting infrastructure.**

**The East Harwell site is considered to be generally viable with the essential infrastructure identified in the current version of the IDP, the Strategic Site Development Templates, CIL as currently proposed and 35% on site affordable housing provision. However, this situation will need to be kept under review as the site progresses and cost estimates and values are refined – and we therefore welcome the flexibility afforded in draft Core Policies 7 and 24.**

**In our view the primary education contributions (via S106) need to be re-calculated. The East Harwell allocation is currently shown as paying the same financial contribution as North West of Harwell Campus and yet East Harwell is also burdened with providing the land for the new school. The 'gifting' of the land needs to be factored into the financial contribution sought from the East Harwell scheme (and the sums in the IDP re-calculated accordingly).**

Upon discussions with the Council, it is understood that Police services and emergency services will be funded through CIL and not S106. It is understood that these will constitute 'Other Social and Community Facilities' on the CIL Regulation 123 List. Explicit reference should be made to these in the List for the avoidance of doubt.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision - where a development is demonstrated to be unviable.

In our view, the primary education contributions (via S106) also need to be recalculated. The East of Harwell Campus allocation is currently shown as paying the same financial contribution as North West of Hartwell Campus, and yet East of Harwell Campus is also burdened with providing the land for the school. The 'gifting' of the land needs to be factored into the financial contribution sought from the East of Harwell Campus scheme (and the sums in the IDP re-calculated accordingly).

Finally, upon discussion with the Council, it is understood that Police services and emergency services will be funded through CIL and not S106. It is understood that these will constitute 'Other Social and Community Facilities' in the CIL Regulation 123 List. Explicit reference should be made to these in the List for the avoidance of any doubt.

**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.

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Yes, I wish to participate at the oral examination

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Date:

19/12/14



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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

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Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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

15

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

Draft Core Policy 15 (Spatial Strategy for South East Vale Sub-Area) emphasises the Council's commitment to aligning housing and employment growth with the infrastructure needed to deliver sustainable development.

**We strongly support the proposed Spatial Strategy and Sub-Area Strategy (Draft Core Policy 15), which seek to align the scale and distribution of new employment and housing growth. We believe the Local Plan strategy accords with the Government's drive for delivering sustainable development.**

**Please refer to the Representation made in respect of Draft Core Policy 15.**

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant

or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

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Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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

24

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

Affordable Housing: The NPPF requires Local Plans to meet the full OAN for market and affordable housing (para 47). The Oxfordshire wide SHMA indicates a need for 273 new affordable dwellings per annum in the Vale of White Horse.

Draft Core Policy 24 (Affordable Housing) proposes 35% affordable housing provision on all sites capable of a net gain of three or more dwellings (sites of at least 0.1 hectare), and a 75:25 split for rented and intermediate housing respectively. The draft Policy also makes provision for a different tenure mix or percentage of affordable housing – where viability issues are evidenced.

We concur with the Council's view that lowering the percentage of affordable housing on qualifying sites to 35% will increase the cushion between the viability threshold and residual value, whilst still ensuring that the OAN for affordable housing can be met in full. Indeed, there is sufficient headroom in the Council's approach to allow for some sites to come forward with a lower percentage of affordable housing (i.e. less than 35%) and still meet the overall OAN for affordable housing.

**We support draft Core Policy 24 (Affordable Housing), which seeks 35% affordable housing on eligible sites and makes provision for a different mix or percentage of affordable housing where supported by viability evidence. The flexibility set out in the Plan will help to ensure that irrespective of changing circumstances or additional issues, the strategic sites will be deliverable.**

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

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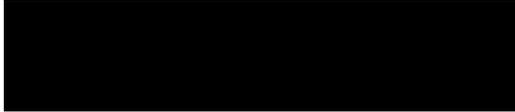
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**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date:

19/12/14



**Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies**  
Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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

4.4

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

**We support the proposed preparation of the Science Vale Area Action Plan as a means of promoting the international significance of Science Vale as a location for research and innovation and of ensuring that growth in the area is delivered effectively and sustainably. Adopting a joint approach with South Oxfordshire District Council and Oxfordshire County Council in the preparation of the Action Plan is welcomed as a means of coordinating the delivery of housing, jobs and infrastructure across Oxfordshire.**

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

N/A

**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**, I do not wish to participate at the oral examination

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## Part A

### 1. Personal Details\*

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Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address  
(where relevant)

### 2. Agent's Details (if applicable)

## 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	Strategic Site Development Templates – Appendix A	Policy		Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes		No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	√	No	
4 (3) Complies with the Duty to co- operate	Yes		No	

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Please refer to our full letter of representation (dated 19<sup>th</sup> December 2014) on behalf of Mr & Mrs CF and NG Lay.

There are some requirements (in sections 2 and 4) where the requirement is absolute rather than qualified by the addition of wording to the effect of 'where necessary/ required'. All contributions or infrastructure provision should be qualified by 'where required'.

Environmental Impact Assessments, Heritage Statements, Impact Assessments and Conservation Area Appraisals should only be undertaken where appropriate. These are not all required for all allocations.

The site specific requirements in section 4 refer to provision of a Police presence on site but this is not included in the Regulation 123 List, nor in the IDP. There does not appear to be evidence in support of this requirement and therefore it should not be included as a site specific requirement.

The site specific requirements in Section 4 (page 35) have as a key objective the need to contribute towards infrastructure as set out in the Oxfordshire Local Transport Plan. Section 2 of Appendix A (General Requirements For All Housing Site Allocations) states that, subject to viability testing, development will be required to contribute to the delivery of strategic transport infrastructure measures, where required. The IDP proposes that all contributions towards the Science Vale Transport Package will be made via CIL. This should be made clear in Appendix A.

The site specific requirements in Section 4 (page 35) have as a key objective the need to provide or support additional high quality facilities to complement those already on the Campus. It is unclear what these facilities are. The infrastructure needed to support the development is set out in the IDP. Further clarity is needed.

The site specific requirements in Section 4 (page 36) state that only the western part of the site is suitable for built development but that the eastern part 'may' be suitable for a school and open space. Firstly, this is contradictory and should be re-phrased (i.e. a school would be built development). Secondly, it should be made clear that the eastern part of the site 'is' suitable for a school and open space to support the site capacity. Section 2 includes the need for applications to be supported by a Landscape and Visual Impact Assessment, which will address the siting and design of the school and associated landscape and visual impact.

The site specific requirements in Section 4 (page 36) require the proportion of public open space to be higher than 'normal' requirements. Yet it also states that development should provide public open space and recreational facilities in accordance with the Vale's emerging playing pitch strategy and the emerging Science Vale Area Action Plan. This is contradictory and unclear. Further clarity is needed.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

We have suggested some amendments to the Site Templates (as set out above).

**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.

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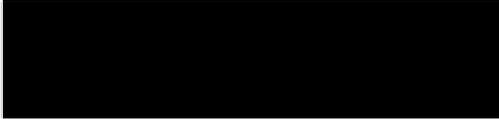
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