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Re: Representations on behalf of Linden Homes (Thames Valley) to the Vale of White Horse Local Plan Part 1 – Submission Draft

INTRODUCTION

Linden Homes (Thames Valley) (“Linden”) has an interest in the land at Shrivenham Park Golf Course and welcome the opportunity to make representations on the final submission draft of the Vale of White Horse Local Plan Part 1, which represents the strategic direction and policies for the district to 2031.

Linden understand that there are elements of the proposed plan which other parties will be arguing are unsound, principally for the following reasons:

- The plan is not effective because it does not seek to positively address the unmet housing need for Oxfordshire;
- The proposed housing allocations within the Green Belt and AONB are not justified; and
- The proposed ring fencing (Core Policy 5) is not consistent with National Planning Policy

In the event that as a result of the above criticisms it is found that additional or alternative housing sites need to be identified in order to make the plan sound, Linden promotes the allocation of land at Shrivenham Park Golf Course as a sustainable and suitable strategic allocation for 200 homes including a significant country park. The merits of the proposals for Shrivenham Park Golf Course are set out below.

Shrivenham Park Golf Course

The proposals for Shrivenham Park Golf Course include the redevelopment of the Golf Course for 200 houses and a significant Country Park. These representations are accompanied by several plans which show the proposals in more details. This site has been carefully examined in relation to its ecology, trees, surface and foul water drainage and highway capacity/access and it has been found to be physically unconstrained and deliverable. The merits and benefits of the allocation of this site are set out below.

Sustainable location – Linden fully supports the neighbouring Shrivenham allocation for 500 houses and Core Policy 3 which classifies Shrivenham as a Local Service Centre within the Western Vale sub area. The Golf Course site directly abuts the allocated site for 500 dwellings identified in the plan. The golf course proposal is intrinsically sustainable in terms of its location next to a local service centre. In a similar way to the allocation, the site benefits from proximity to existing social, commercial and retail facilities and an existing community. This contrasts with the essential unsustainability of several allocations elsewhere in the district, in protected landscapes of the AONB, in greenbelt locations and those detached from established existing communities. Linden believes that this comparative analysis is necessary and that it points to the desirability and benefits of adding the golf course site to the proposed allocation of 500 houses.

Environmental and social benefits – Paragraph 69 of the NPPF emphasises the importance of facilitating social interaction and the creation of healthy and inclusive communities. Paragraph 70 indicates the need to deliver social and recreational spaces for the benefit of all. In this case Linden proposes the creation of a publicly accessible country park in place of a Private Members golf course. The proposed housing area is the smaller proportion of the land available which stretches between the new boundary of Shrivenham (to be created by the 500 dwellings allocation) and the existing edge of the nearby village of Watchfield. This expansive country park would therefore preserve in perpetuity public access to a green buffer which separates the two settlements. The proposed housing is directly linked to the centre of Shrivenham and to the adjacent allocation by roads and public footpaths. As such this additional 200 dwellings is well integrated with the proposed allocation but would deliver significantly greater benefits for the new occupiers and members of the existing community.

Due to the available land, the scheme also has the ability to provide a significant additional green buffer along the frontage with Faringdon Road to retain the visual separation between Shrivenham and Watchfield.

Community Infrastructure – Linden has proposed that part of the site could be made available for a new doctor's surgery or other community facility. This is an unusual situation in that the entire area of the golf course (less the space 200 dwellings) is available for community benefit. This is in a location where there is already a proposal for a significant additional number of dwellings. These discussions are ongoing and concrete proposals have yet to be agreed. Nevertheless allocation would provide this potential. The process of allocating site within the local plan is a comparative one and where certain locations are more sustainable and offer greater social community and environmental benefits they should take precedence over less desirable alternatives. Bearing in mind that the delivery of sufficient houses within part one of the plan depends upon the allocation of sites which should only come forward in exceptional circumstances (AONB and Green Belt allocations), it is clear to Linden that this proposal is manifestly more desirable in planning terms.

Foul Drainage – It is a practical local matter but one that weights in the balance in favour of the allocation of this site. The foul drainage system within the village suffers from connectivity problems that add potential delays and financial costs to the delivery of the 500 unit allocation. As the golf course lies between the proposed 500 unit allocation and the sewerage works this difficulty can be overcome through the allocation of this site. This would assist in deliverability of a sustainable scheme.

Education provision – One of the requirements of the 500 dwelling allocation is the provision of a new school. However this presents an undesirable compromise in relation to the educational facilities

available. The existing nearby single form entry primary school is incapable of being expanded to sufficient size to deal with the increased demand resulting from 500 dwellings. But 500 dwellings is not sufficient to pay for a new two form entry school. In the absence of education authority investment the result will be two single form entry elements of the same school split between two sites. This two site solution is not considered desirable by any stakeholders. In contrast the addition of 200 dwellings to this allocation would enable the creation of a new two form entry school which it is understood is the desired solution for the area. It is anticipated that Oxfordshire County Council will be making representations to this effect.

Ecology and biodiversity – The site in question is currently a private members golf course which will close in June 2015. It is currently an intensively managed area that offers little environmental or ecological benefit. To the north of the site is the SSSI Tuckmill Meadows Nature Reserve. The design, layout, landscaping and management of the Country Park, (including the residential area as proposed), could be used to enhance and improve the broader ecological and wildlife potential of the SSSI. The proposed public footpaths between Shrivenham and Watchfield across the Country Park would also assist in diverting pedestrians away from the current route through the SSSI which would be of benefit to the ecological interests.

Suggested Main Modification

In view of the above, Linden believes that the allocation of the land at Shrivenham Park Golf Course for 200 dwellings (plus country park, contributions to new school and potential site for health care facilities) is a 'sound' alternative to unjustified release of Green Belt and AONB land.

Summary of Benefits

The allocation of this site would serve to enhance the benefits derived from the allocated 500 dwelling site immediately adjacent. This proposal would facilitate the provision of a two form entry primary school, provide a publicly accessible Country Park, provide a site for improved healthcare facilities and offer the enhancement of the ecological benefits and biodiversity of the nearby SSSI.

CONCLUSIONS

- **Strategic Allocations:** The delivery of houses in the plan currently relies upon the allocation of sites in protected landscapes, which is contrary to national policy because these allocations are unjustified in the context of more sustainable alternatives. A specific alternative is the Golf Course site adjacent to the 500 unit allocation at Shrivenham which could be secured through a modification.
- **Distribution of Housing:** We request that the Inspector modifies the plan to delete the 'ring fence'. This is proposed as a means of protecting the rest of the District from possible future failures of housing delivery. Rather than protecting against the possible failure of major allocations more deliverable alternatives should be identified. The deliverable site of Shrivenham Golf Course is an obvious solution to ensure delivery.
- **Duty to Cooperate:** the additional houses that will inevitably arise from Oxford City's inability to meet its requirements under the Oxfordshire SHMA should be taken into account now and more

houses allocated in the first five years of the plan period. Shrivenham Golf Course is a deliverable site and its allocation would assist in securing adequate housing.

Ken Dijkman MRTPI