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L 141217 DB Local Plan reps



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Dear Sir/ Madam

RE: Pre-submission Draft Local Plan 2031 consultation

Savills is instructed by O&H Properties Ltd (hereafter referred to as 'Our client') to act on their behalf in relation to a site north of Appleford Road in Sutton Courtenay which was reported positively in the recent Strategic Housing Land Availability Assessment (SHLAA). The site has previously been submitted to and considered by the District Council as part of the SHLAA (SUTC17). This letter is submitted in response to the recently released Draft Local Plan 2031 Part 1 – Strategic Sites and Policies.

The Draft Local Plan 2031 – Part 1

The Draft Local Plan 2031 was published in November 2014 for a period of consultation. The plan sets out the strategic sites and policies for the District, split into chapters including Spatial Vision, Spatial Strategy, Sub-Area Strategies and District Wide Policies.

Considering the key chapters of the Local Plan it is noted that the plan acknowledges the SHMA identified housing needs of the District. This approach is supported by our client along with CP2 of the draft Local Plan which relates to co-operation with the unmet housing needs of the wider Housing Market Area. The settlement hierarchy set out in CP3 of the plan is clear and we support the allocation of Sutton Courtenay as a Larger Settlement. CP4 of the plan is sound in that it provides for the full objectively assessed need as identified in the Oxfordshire SHMA.

It is however noted that there are discrepancies in the plan and its categorisation of Sutton Courtenay. On page 39 of the Plan (CP4) Sutton Courtenay is shown in the South East Vale Sub-Area and this is replicated in the plan on page 50 of the document. Whilst this is the case Sutton Courtenay is included in the spatial strategy for the Abingdon on Thames and Oxford Fringe Sub Area detailed on page 52 and as a larger village of this area on page 37 of the plan. The village does seem to sit more closely with Abingdon on Thames and Oxford fringe sub region given its position north of the railway line.

The general policy in relation to the provision of housing in the larger settlements does allow for development on the edges of settlements (CP4) where it comprises sustainable development and is well related to the existing settlement. Given that the larger settlements are some of the most sustainable settlements in the District this approach is supported and sound in relation to the guidance of the NPPF.

There remains concern however, regarding the potential impact of the additional allocations proposed within the Area of Outstanding Natural Beauty and the potentially harmful impact this could have over a designated landscape. The allocations at Harwell are all within the AONB and constitute, in some cases, significant expansions to the existing settlement. These significant additions within the AONB would seem to move



against the grain of the NPPF which states that *'great weight should be given to conserving landscape and scenic beauty within....Areas of Outstanding Natural Beauty'*.

It is noted that there are a number of policies set out in the District Wide Policies section of the plan. The policies in this section would relate to any form of development and are generally supported and appropriate for this more 'strategic' level of the plan.

In general terms our client is of the opinion that the approach and strategy of the Local Plan are supported. The emphasis of directing most development to the most sustainable settlements is in agreement with the NPPF. It remains our opinion that the Strategic allocations of some 1400 dwellings in the AONB (on the edge of Harwell) would have a harmful impact upon the scenic qualities of the AONB and it is suggested that the provision of a number of alternative sites in less sensitive locations could help to achieve housing requirements but with significantly less impact. In addition there are, some discrepancies which need to be resolved in relation to the categorisation of some settlements.

Land north of Appleford Road, Sutton Courtenay

Our client's site, located to the North of Appleford Road, Sutton Courtenay, is considered to be one such suitable alternative site. The SHLAA conducted by the District Council in 2014 highlighted the suitability of the site for housing development also noting that the site is available, achievable and deliverable.

The site is not within any protected area of landscape however part of the site does fall within Flood Zones 2 and 3. Given the nature of the site, subject to a suitable design and form the provision of dwellings on the site would not give rise to harm to any protected landscape. The relevant areas of floodplain would remain undeveloped as part of any scheme and would form green infrastructure associated with the development.

In itself, the provision of dwellings on this site would also provide for a sustainable form of development. The site is well related to the village, in particular more recent housing developments at Amey Close and the outline consent granted on the Amey site opposite. The village is served by a range of facilities which, according to the Village Facilities Study (also undertaken in 2014) include a primary school, local shops, church, public house, sports hall, village hall and post office. In addition, the study identifies that the village is within close proximity of existing employment sites and is well related to the main settlements of Abingdon and Didcot.

Bus routes run between the centre of Sutton Courtenay and Abingdon on an hourly basis Monday to Friday. Furthermore, two services run between Culham and Abingdon and Culham and Oxford on an hourly basis. An additional service also operates between Culham, Wallingford and Abingdon twice daily Monday – Saturday. The bus stops in Culham are located approximately 15 minutes walk from the site owned by our clients. In addition to the bus stops the train stations of Culham and Appleford are also within close proximity. Culham train station is a 40 minute walk or 15 minute cycle journey away with Appleford only a 20 minute walk or 5 minute cycle away.

The allocation of this site would provide an opportunity to reduce the number of dwellings required in sensitive locations whilst providing for the required levels of housing and supporting the vitality and viability of existing services within the settlement.

It is acknowledged at this stage that this site would not comprise a 'strategic site' of 200 houses or more, but it is considered to be appropriate for development and would be an ideal site for allocation through the Part 2 plan.

Summary and Conclusions

As noted above we continue to express concern regarding major developments in the AONB and our client's site offers the opportunity to provide for additional housing numbers in a location which is less sensitive in landscape terms. It also provides for a sustainable form of development in an appropriate and well connected

location. As such, we would strongly encourage the District Council to allocate our client's site in Part 2 of the Local Plan 2031 as it comes forward.

I would be grateful if you could keep us informed in relation to the progress of the Local Plan in due course.

Yours sincerely



Dawn Brodie MRTPI
Associate

cc. Pippa Cheetham - O&H Properties