

**Vale of White Horse District Council
Local Plan 2031 Part 1: Strategic sites and policies
(Publication Version)**

Consultation response made on behalf of Mr W M Wasbrough



December 2014

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1.0 Introduction

- 1.1.1 This consultation response is submitted by Smiths Gore on behalf of Mr W M Wasbrough. It is prepared following an invitation from Vale of White Horse District Council to comment on the publication version of the emerging Local Plan 2031 Part 1: Strategic Sites and Policies.
- 1.1.2 The purpose of this response is to reiterate the availability and deliverability of the land south of Downsview Road, to the west of Wantage, and land off Windmill Place, East Challow as sites for future residential development. It presents a strong planning case which demonstrates that these sites present sustainable locations for future development and that they can deliver significant benefits to the local and wider community.
- 1.1.3 This response makes detailed comments on particular sections of the document, clearly explaining whether policies are considered to be 'sound' or 'unsound'. Where policies are deemed to be unsound recommendations are provided on how they could be amended in order to make them sound.

2.0 Local Plan Preparation – Tests of Soundness

2.1.1 Local Plans at the 'publication' stage should accord with certain tests which are outlined in the National Planning Policy Framework (the Framework). These tests are in place to allow a Planning Inspector to assess whether a plan is sound. A sound plan is described at paragraph 182 of the Framework as being:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.2 This consultation response has been prepared with these tests in mind and considers the policies contained within the Local Plan Publication Draft against each of them. It also tests them against other relevant policies within the Framework in order to ensure it is consistent with national policy.

3.0 Core Policy 1 – Presumption in Favour of Sustainable Development

SOUND – The policy complies with national planning policy

- 3.1.1 Mr W M Wasbrough is supportive of the inclusion of Core Policy 1 and considers the wording of the policy to accurately reflect the 'Presumption in Favour of Sustainable Development' as set out in paragraph 14 of the Framework.

4.0 Core Policy 2: Cooperation on unmet housing need in Oxfordshire

UNSOUND – The policy is not positively prepared as it fails to address the unmet housing requirements from neighbouring authorities in the Oxfordshire Housing Market Area.

- 4.1.1 The policy acknowledges that Oxford City Council is unable to meet its own objectively assessed housing needs and that this has been robustly tested and agreed.
- 4.1.2 Paragraph 182 of the Framework states that, in order to be sound, Local Plans must be positively prepared. To achieve this the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 4.1.3 In order for the Local Plan to satisfy this test of soundness it should take account of housing need within the Vale of White Horse district and also the known level of unmet housing need within Oxford City and other districts within the Housing Market Area. This is the objectively assessed housing need that the Local Plan should be seeking to address. Using this evidence the Vale of White Horse District Council should have undertaken a strategic assessment to determine what proportion of this unmet need it can accommodate in the district over the coming plan period, in addition to meeting its own needs.
- 4.1.4 Core Policy 2 openly states that this is not the approach that has been taken in preparing this Local Plan. At this stage, the Local Plan only aims to address the objectively assessed housing needs of the Vale of White Horse, but does not seek to accommodate identified unmet housing needs of Oxford City. It is therefore considered that the Local Plan has not been positively prepared.
- 4.1.5 In order to be consistent with national planning policy it is considered that an assessment needs to be carried out to determine what level of unmet housing need from Oxford City can be accommodated in the Vale of White Horse District. This information must then be built in to the Local Plan's housing targets in order for it to be 'positively prepared'.

5.0 Core Policy 4: Meeting Our Housing Needs

UNSOUND – The policy is not positively prepared or justified as it does not seek to address unmet housing requirements from neighbouring authorities and is not sufficiently flexible to meet the housing target identified.

- 5.1.1 In section 4 of this consultation response an objection has already been raised in relation Core Policy 2, which does not seek to accommodate the unmet housing needs of Oxford City. See section 4 for a detailed commentary on this matter.
- 5.1.2 The housing target set out in Core Policy 4 has been derived on the basis of the methodology set out in Core Policy 2. Therefore this policy has also not been positively prepared and so is unsound.
- 5.1.3 Notwithstanding the above objection, Core Policy 4 is also considered to be unjustified as it is insufficiently flexible to achieve the housing target provided. This is discussed further below.
- 5.1.4 The housing target set for the Vale of White Horse District is for "*at least 20,560 homes*" to be delivered between 2011-2031. Of these, 13,960 dwellings will be delivered through strategic allocations, of which 10,320 will be provided within the South East Vale Sub-Area.
- 5.1.5 Mr W M Wasbrough supports the Council's decision to direct the majority of new homes within the South East Vale Sub-Area, which comprises a number of larger settlements with a wide range of facilities. This sub area is also home to many of the District's largest employment sites, both existing and proposed.
- 5.1.6 Within the South East Sub Area 10 sites have been identified which are to accommodate strategic levels of housing development and Core Policy 4 provides indicative figures for how many dwellings each site will deliver. When the indicative figures for each of these sites is added together the total number of dwellings equals 10,320 exactly. With 10,320 also being the minimum housing target for the sub area, it is considered that the Council should be aiming to exceed this number rather than planning to the margin in this way. This concern was raised in our consultation response to the previous iteration of the draft Local Plan and it is disappointing to see that the Council has not amended its proposed approach in this respect.
- 5.1.7 Although high level assessments have been undertaken for sites across the District, it is apparent that in most cases no detailed masterplanning process has taken place. As such the housing targets for each site, both in terms of numbers and rates of delivery

are only very approximate estimations at this time. It is entirely possible that some, or all of these sites will be unable to deliver the number of homes anticipated and some may not come forward for development at all.

- 5.1.8 There are significant uncertainties surrounding the ability of the selected strategic allocations to deliver the number of homes required. If even one of these sites fails to deliver in the manner anticipated then there is potential for the entire Local Plan strategy to be undermined because there is no built in flexibility to deal with this eventuality. For this reason it is considered that Core Policy 4 is not positively prepared as it is not sufficiently flexible to ensure that housing needs are met over the plan period.
- 5.1.9 To ensure that the objectively assessed housing needs can be met in full over the plan period it is strongly recommended that additional sites are allocated for development. In this way the Local Plan strategy would not be undermined in the event that one or more sites are unable to deliver sufficient homes within the required timeframe. Applying this type of contingency approach is supported by the National Planning Policy Framework which requires Local Plans to be both positively prepared and deliverable.
- 5.1.10 In light of the comments made above the Council is strongly urged to allocate additional sites for future housing development in the Local Plan. In this regard the following two sites, which are in the ownership of Mr W M Wasbrough, are available for development. They also offer an opportunity to deliver sustainable forms of development which benefit the local and wider community.

Land off Windmill Place, East Challow

- 5.1.11 A planning application has been submitted to Vale of White Horse District Council for the development of 50 dwellings on land off Windmill Place, East Challow. This development offers an excellent opportunity to meet local needs for open market and affordable housing.
- 5.1.12 East Challow is located approximately 0.5km west of Wantage. It is a village comprising a good range of facilities including a primary school, a local pub, a village hall, a Royal British Legion Club, a cricket club, children's play facilities and allotments. The local secondary school is also located just outside of the village. Wantage is also accessible from the village by foot or by bicycle, or alternatively there is a regular bus service that runs between the two settlements. Due to the size of the village and the level of services and facilities available, East Challow is proposed to be designated as a large village in the Local Plan.

5.1.17 The site area identified in Fig. 3 provides a developable area of 21.5ha. Assuming a high density of development of 30dph the site could deliver around 645 dwellings. Access to the site could be achieved from Downsview Road.

5.1.18 The land south of Downsview Road presents a sustainable location for future development as follows.

Environmentally sustainable

- The site does not fall within the Area of Outstanding Natural Beauty (AONB) or Green Belt.
- The site does not lie within an area designated as being of any particular ecological value.
- Mr W M Wasbrough's land ownership extends along a significant length of the Wilts and Berks Canal between East Challow and Wantage, a stretch in critical need of restoration. New development on the land south of Downsview Road could help to fund this restoration project, with significant ecological, landscape and social benefits.
- Development of this land will ensure that the physical separation of East Challow and Wantage is maintained.
- The land is well related to existing areas of employment. This is also closely related to the Grove Airfield site and the two Stockham Farm sites which have been granted planning permission for development.
- Wantage is a town with a wide range of services and facilities and so future residents will be able to meet their daily needs without being reliant upon private vehicles.
- The South East Vale sub area includes a number of significant centres of employment. These can be reached from the site via a range of sustainable modes of transport.

Socially sustainable

- This site could potentially deliver up to 645 new homes. The allocation of this land for housing development will help to ensure that the District’s housing needs are met over the coming plan period.
- The land is well related to Wantage which provides a range of services and facilities. These are easily accessible from the site.
- Enhancing this section of the Berks and Wilts Canal will provide important benefits in terms of leisure and recreation.

Economically sustainable

- The site falls within the ‘South East Vale’ sub area and ‘Science Vale’ area where significant employment growth is planned for the coming plan period. The provision of additional new homes within the area will help to support this planned economic growth.

Potential for a new West Wantage Link Road

5.1.19 Core Policy 18 of the Local Plan proposes to ‘safeguard’ a stretch of land across the land south of Downsview Road for a West Wantage Link Road.

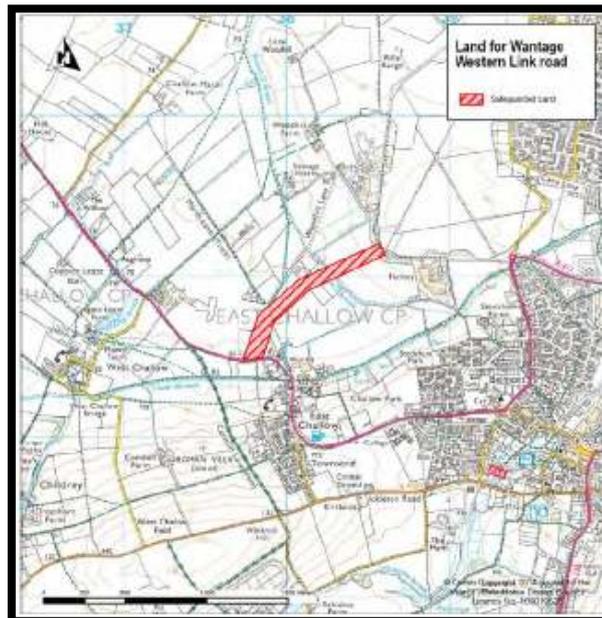


Fig 2: Land proposed to be safeguarded for West Wantage Link Road

- 5.1.20 The proposed route for the link road does not take account of important issues such as land ownership or topography and so in its current state is unlikely to be deliverable. With land ownership extending between Wantage and East Challow Mr W M Wasbrough is uniquely positioned to assist with the delivery of the Western Link. It is considered that a Western Link could follow the route indicated in fig. 1 (see above).
- 5.1.21 It is considered that the delivery of the Western Link during this plan period would provide significant benefits in terms of easing pressure on the existing highway network leading west out of Wantage, particularly when you consider the developments which have been approved at Grove Airfield and Stockham Farm. Currently the only travel options for leaving Wantage are the A417 or the B4507 which involve travelling through the busiest parts of Wantage. A Western Link would provide a much needed alternative route out of the town.
- 5.1.22 Mr W M Wasbrough would be able to provide the land required to deliver the Western Link (see fig.1) and there is an excellent opportunity to deliver the new road, which can be part funded by development on this land and by contributions pooled through the Community Infrastructure Levy.

6.0 Core Policy 15 – Spatial Strategy for South East Vale Sub-Area

UNSOUND – The policy is not positively prepared or justified as it does not seek to address unmet housing requirements from neighbouring authorities and is not sufficiently flexible to meet the housing target identified.

- 6.1.1 In section 4 of this consultation response an objection has already been raised in relation Core Policy 2, which does not seek to accommodate the unmet housing needs of Oxford City. See section 4 for a detailed commentary on this matter.
- 6.1.2 The housing target for the South East Vale Sub-Area in Core Policy 15 has been derived on the basis of the methodology set out in Core Policy 2. Therefore this policy has also not been positively prepared and so is unsound.
- 6.1.3 Notwithstanding the above objection, Core Policy 15 is also considered to be unjustified as it is insufficiently flexible to achieve the housing target provided. This is discussed further below.
- 6.1.4 Within the South East Vale Sub Area 10 sites have been identified which are to accommodate strategic levels of housing development and Core Policy 15 provides indicative figures for how many dwellings each site will deliver. When the indicative figures for each of these sites is added together the total number of dwellings equals 10,320 exactly. With 10,320 also being the minimum housing target for the sub area, it is considered that the Council should be aiming to exceed this number rather than planning to the margin in this way. This concern was raised in our consultation response to the previous iteration of the Local Plan and it is disappointing to see that the Council has not amended its proposed approach in this respect.
- 6.1.5 Although high level assessments have been undertaken for sites across the District, it is apparent that in most cases no detailed masterplanning process has taken place. As such the housing targets for each site, both in terms of numbers and rates of delivery are only very approximate estimations at this time. It is entirely possible that some, or all of these sites will be unable to deliver the number of homes anticipated and some may not come forward for development at all.
- 6.1.6 There are significant uncertainties surrounding the ability of the selected strategic allocations to deliver the number of homes required. If even one of these sites fails to deliver in the manner anticipated then there is potential for the entire Local Plan strategy to be undermined because there is no built in flexibility to deal with this

eventuality. For this reason it is considered that Core Policy 15 is not positively prepared as it is not sufficiently flexible to ensure that housing needs are met over the plan period.

- 6.1.7 To ensure that the objectively assessed housing needs can be met in full over the plan period it is strongly recommended that additional sites are allocated for development. In this way the Local Plan strategy would not be undermined in the event that one or more sites are unable to deliver sufficient homes within the required timeframe. Applying this type of contingency approach is supported by the National Planning Policy Framework which requires Local Plans to be both positively prepared and deliverable.
- 6.1.8 In light of the comments made above the Council is strongly urged to allocate additional sites for future housing development in the Local Plan. In this regard the following two sites, which are in the ownership of Mr W M Wasbrough, are available for development. They also offer an opportunity to deliver sustainable forms of development which benefit the local and wider community.

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- 6.1.10 East Challow is located approximately 0.5km west of Wantage. It is a village comprising a good range of facilities including a primary school, a local pub, a village hall, a Royal British Legion Club, a cricket club, children's play facilities and allotments. The local secondary school is also located just outside of the village. Wantage is also accessible from the village by foot or by bicycle, or alternatively there is a regular bus service that runs between the two settlements. Due to the size of the village and the level of services and facilities available, East Challow is proposed to be designated as a large village in the Local Plan.
- 6.1.11 In light of the above factors it is considered that the land off Windmill Place should be allocated for the development of 50 homes in the Local Plan.

Land South of Downsview Road

- 6.1.12 In our consultation response to the previous iteration of the draft Local Plan, the land south of Downsview Road was promoted as being available, deliverable and sustainable for development. Fig 1 (see above) illustrates the extent of land in the ownership of Mr W M Wasbrough.

6.1.13 The land identified above was subjected to a high level assessment by Vale of White Horse District Council when considering which sites to allocate for development in the Local Plan. Following that assessment it was decided not to allocate the land because it would erode the open gap between Wantage and East Challow.

6.1.14 Although all of the land shaded on the above plan is available for development it is not anticipated that the entire site should come forward for development as it is important that a physical gap remains between East Challow and Wantage. The red line indicates what is considered to be an appropriate developable area for the site. The remainder of the land area can be secured as green infrastructure in perpetuity so as to retain an appropriate sense of separation between the two settlements and to prevent any possibility of future coalescence. The arrows indicate the flexibility of the developable area, which could potentially be extended to provide additional development if required.

6.1.15 The site area identified in Fig. 1 provides a developable area of 21.5ha. Assuming a high density of development of 30dph the site could deliver around 645 dwellings. Access to the site could be achieved from Downsview Road.

6.1.16 The land south of Downsview Road presents a sustainable location for future development as follows.

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- 6.1.18 The proposed route for the link road does not take account of important issues such as land ownership or topography and so in its current state is unlikely to be deliverable. With land ownership extending between Wantage and East Challow Mr W M Wasbrough is well positioned to assist with the delivery of a Western Link. It is considered that a Western Link could follow the route indicated in fig. 1 (see above).
- 6.1.19 It is considered that the delivery of the Western Link during this plan period would provide significant benefits in terms of easing pressure on the existing highway network leading west out of Wantage, particularly when you consider the developments which have been approved at Grove Airfield and Stockham Farm. Currently the only travel options for leaving Wantage are the A417 or the B4507 which involve travelling through the busiest parts of Wantage. A Western Link would provide a much needed alternative route out of the town.
- 6.1.20 Mr W M Wasbrough would be able to provide the land required to provide a Western Link (see fig.1) and there is an excellent opportunity to deliver the new road, which can be part funded by development on this land and by contributions pooled through the Community Infrastructure Levy.

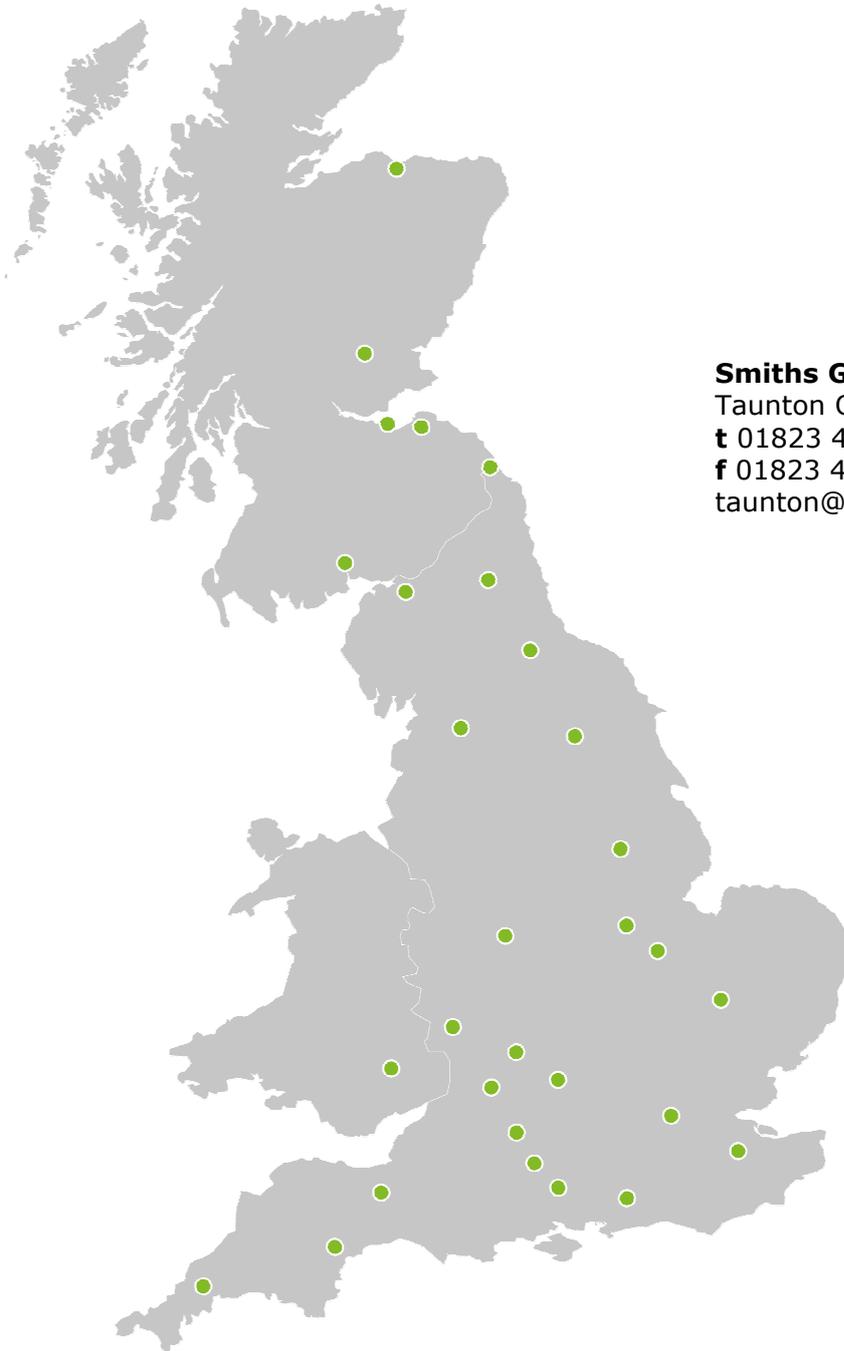
7.0 Core Policy 18 – Safeguarding of Land for Transport Schemes in the South East Vale Sub-Area

UNSOUND – The land proposed to be safeguarded for the West Wantage Link Road does not follow a route which is deliverable. The policy is therefore not effective.

- 7.1.1 Mr W M Wasbrough is generally supportive of the proposal to safeguard land for the delivery of a new West Wantage Link Road. However, it is considered that the route proposed for the new road is inappropriate and subsequently undeliverable.
- 7.1.2 The proposed route for the link road does not take account of important issues such as land ownership or topography and so in its current state is unlikely to be deliverable. With land ownership extending between Wantage and East Challow Mr W M Wasbrough is uniquely positioned to assist with the delivery of a Western Link. It is considered that a Western Link could follow the route indicated in fig. 1 (see above).
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8.0 Participation in the Examination in Public

8.1.1 It is considered necessary to participate in the forthcoming Examination into the Vale of White Horse Local Plan Part 1 so that the interests of my client are properly represented in this process.



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