

Local Plan 2031 Part 2

Publication Version
Representation Form

Ref:

(For official use
only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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 representing (where relevant)	Webbpaton
Address Line 1	
Address Line 2	
Address Line 3	
Postal Town	
Post Code	
Telephone Number	
Email Address	

2. Agent's Details (if applicable)

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Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: McLoughlin Planning (on behalf of Webbpaton)

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

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☐

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Please see attached documents.

(Continue on page 4 /expand box if necessary)

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

Please see attached documents.

(Continue on page 4 /expand box if necessary)

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

☒

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:

Please see attached documents.

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

Signature:

Date:

22/11/2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒

I would like to be added to the database to receive general planning updates

☒

Please do not contact me again

☐

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

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REPRESENTATIONS STATEMENT

In respect of:
Vale of White Horse Local Plan Part 2 – Publication Version
At:
Land at Longworth and Shellingford
On behalf of:
Webbpaton





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1.0 Introduction

- 1.1. McLoughlin Planning is instructed by Webbpaton to make submissions of the Vale of White Horse Local Plan Part 2 (Publication Version) in respect of its land and development interests at Longworth and Shellingford. Red line site location plans are attached as **Appendix A**. Webbpaton's aim is to have this sites allocated for housing development
- 1.2. This Document is structured as follows:
 - Section 2 – Representations on the Local Plan Part 2
 - Sections 3 – Site Allocation Statements



2.0 Representation on the Local Plan Part 2 Policies

Chapter 1 Introduction

- 2.1. At this stage, Webbpaton considers that there is greater need for clarity in the Plan as to its relationship between Part 2 and the Adopted Part 1. In the earlier stages of the Part 1 process, it was clear that the Council's approach was to have Part 2 as a supporting DPD to Part 1. Therefore, in terms of a chain of conformity, there was a need for Part 2 to comply with the provisions of Part 1.
- 2.2. In these earlier stages, Part 2 was anticipated to be a small site allocations DPD, dealing with non-strategic (i.e. sub 200 dwelling) development sites in village locations. However, it is clear from the EiP and subsequent Inspector's Report that this original aspiration has been distorted by the need for Part 2 to now address the issue of Oxford's unmet need and the duty on Vale to co-operate with Oxford in meeting this need. Webbpaton considers the approach and allocations made contrary to the original purpose of Part 2.

Chapter 2 Additional Sites and Sub-Area Strategies

- 2.3. Webbpaton has concerns about the approach of the Plan. There is a requirement for the Plan to be prepared in accordance with the Local Development Scheme; with PAS guidance on the matter identifying a need that the Plan's listing and description in the LDS matches the document concerned (PAS self assessment checklist – stage 5 submission).
- 2.4. In terms of the LDS for Part 2, the most recent version of the document is the September 2016 version, available on the Council's website. It should be noted that at the time of the consultation exercise on Part 2, there is no more up-to-date version of the LDS available. Page 4 of the LDS sets out the role and subject of Part 2. Aside from setting out how the Council proposes to meet Oxford's Unmet Need, it goes onto state that:

"This document will also contain policies for the part of Didcot Garden Town that lies within the Vale of White Horse District and detailed development management policies to complement the Local Plan Part 1, replacing the saved policies of the Local Plan 2011, and allocating smaller development sites for housing and other uses"
- 2.5. Reference is clearly made in the document to "smaller development sites".



- 2.6. Against this backdrop, it is necessary to consider the relationship between Part 1 and Part 2. Paragraph 2.3 of Part 2 sets out the three main strands to the spatial strategy set out in Part 1. In the respondents case, its land at Steventon should be seen in the context of the third strand:

"Promoting thriving villages and rural communities whilst safeguarding the countryside and village character"

- 2.7. Whilst not referenced in Part 2, Figure 4.1 of Part 1 expands on this key strand by stating that the above objective will be met by, inter alia:

"Identifying appropriate housing requirements for the rural areas to inform neighbourhood plans or the Local Plan 2031 Part 2"

- 2.8. This sets out a clear commitment for the Part 2 process to review the housing requirements for the rural area. There then follows a pledge to focus development at larger villages to help maintain their vitality and sustainability. Webbpaton's position is that Part 2 simply does not perform this task and as a result is not consistent with the Part 1 document. The need for consistency between Part 1 and Part 2 is critical to the Plan's soundness in that Part 1 sets the overall development strategy and a portfolio of strategic development sites to meet the Vale's Objectively Assessed Needs and Part 2 has a limited brief in providing sites for Oxford's Unmet need (as set out in Part 1) and providing sites for the balance of the Vale's housing requirement not allocated in Part 1. In this respect, Part 2 is a daughter document to Part 1. The respondents position is that Part 2 only seeks to make a handful of allocations at a handful of locations and at a level which is more reflective with the strategic approach adopted in Part 1. It is the respondent's position that the Plan is unsound in its approach in that it is not consistent with Part 1 and fails the test of being consistent with the Local Development Scheme (September 2016).

Paragraphs 2.12 to 2.32

- 2.9. Webbpaton wishes to make the following observations about the unmet need for Oxford.
- 2.10. To start, Part 2 is a plan, which has been prepared to clearly meet the unmet needs of Oxford. This places an additional requirement on the Council to make allocations for 2,200 dwellings specifically for this requirement. In terms of the location of those dwellings Webbpaton is supportive of the efforts made in Part 2 to locate housing as close to Oxford as possible in the Abingdon on Thames sub area. Webbpaton considers that further explanation of the matter with reference to Part 1 allocations is unhelpful and clouds the issue. This is especially the case with Table 2.1 with "allocations that are close to and accessible to Oxford". For ease of reference it is



recommended that the table is removed and simply replaced with a schedule of sites in Part 2, which are specifically to address the unmet need for Oxford.

2.11. To address Webbpaton's concern about soundness and the LDS, a new paragraph should be inserted into the document (suggested at 2.8) to read:

- *"This Part 2 plan will support the above objective by making a range of housing allocations to meet Oxford's Unmet need as well as the requirements for "smaller development sites" arising from Part 1. This includes housing at green belt village locations."*

Core Policy 4A

2.12. In general terms Webbpaton supports the need for Part 2 to make additional housing allocations to meet Oxford's unmet need. However it objects to the approach of the Plan in amalgamating the 1,000 dwellings reserved in Part 1 for Part 2 allocations into the Oxford unmet need figure. The concern here is that this draws no distinction between what is required to address the Council's remaining requirement (as per Part 1) and what is required to specifically address the unmet need of Oxford (the 2,200).

2.13. Whilst Webbpaton supports the need for Part 2 to make additional housing allocations, it is a criticism of Part 2 of the Local Plan that it effectively focuses new development on only a handful of locations within the Abingdon-on-Thames and Oxford Fringe Sub-Area and the South East Vale Sub-Area. This is clearly contrary to the "key strand" set out in Figure 4.1 of Part 1 in providing housing in rural areas and is compounded by the fact that Part 2 fails to allocate any further housing within the Western Vale Sub-Area. This undermines the ability of smaller settlements to accommodate modest levels of growth to support the vitality of settlements in accordance with paragraph 55 of the Framework. Furthermore, it should also be noted that paragraph 55 of the Framework recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby.

2.14. With regards to the Council's need to maintain a 5-year housing land supply, it is noted from the Council's annual 5-year housing land supply statement (paragraph 4.5) that all allocations from Part 2 are discounted because they are yet to demonstrate that they are deliverable. By the same token, it is noted that there are a number of Part 2 allocations assumed to commence delivery within 5 years. Webbpaton questions the apparent conflict between the two approaches.



Changes Sought

2.15. In order to address the soundness issue, it is suggested that the following is inserted into the Policy.

- *"This policy looks to provide housing to meet Oxford's unmet needs as well as the residual requirement identified in Part 1 to be allocated in Part 2. This will be secured by a series of allocations at a strategic and non-strategic level in green belt and non-green belt locations."*

Housing Target

2.16. Webbpaton wishes to raise the following concerns about the soundness of the housing table on page 26 of Part 2.

2.17. To start, Core Policy 4 of Part 1 sets out a housing target for the District for at least 20,560 homes to be delivered in the plan period between 2011 and 2031. This figure is made up of:

- 12,495 dwellings will be delivered through strategic allocations.
- 1,000 dwellings remain to be identified through the Local Plan 2031 Part 2 or Neighbourhood Development Plans.
- 840 windfalls.

2.18. The table in Policy 4a identifies a target of 22,760. This equates to the 12,495 + 2,200 (Oxford's unmet need). Whilst a supply of housing over and above the housing target for the District is welcomed, Webbpaton is concerned about how the 1,000 dwellings in Part 1 Core Policy 4 will be accommodated in Part 2. In conjunction with other representations, there is a need to set out how the 1,000 dwellings from Part 1 are being accommodated and how these are providing for the original objective of meeting the requirement set out in Figure 4.1 of Part 1.

Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area

2.19. Webbpaton objects to policy 8a given that the approach taken to allocations in Part 2 is unsound and is not consistent with national policy. This is because there are concerns about the Sustainability Appraisal and Topic Paper, which underpins the decisions made about housing allocations made in this Sub-Area. It therefore fails the tests of being "justified" and "consistent with national policy".



Is the Plan “Justified”?

- 2.20. Paragraph 182 of the Framework states:

“The plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.”

- 2.21. Webbbpaton objects to the policy on the basis that the assessment of reasonable alternatives, as set out in the Sustainability Appraisal Site Section Topic Paper, was flawed.

Reasonable Alternatives

- 2.22. The Sections 6.3 and 6.4 of the Sustainability Appraisal deal with larger and smaller site options and 6.4 makes it clear that the threshold for small sites. In terms of 50 dwellings being chosen as the threshold, there is no evidence in the Sustainability Appraisal to support the limit, but reference is made the Council’s Site Selection Topic Paper where sub-50 dwellings is considered to be a neighbourhood planning level. No evidence supports this position.
- 2.23. Paragraph 6.5.4 sets out the pre-conditions to assessing small sites, in so doing; Dalton Barracks was seen as a constant across “all reasonable alternatives”. Given concerns expressed elsewhere in these representations, the Sustainability Appraisal should have considered the implications of not having Dalton Barracks in the Plan.
- 2.24. The Sustainability Appraisal also fails in its approach to assessing locations for smaller sites in that East of Kingston Bagpuize and Southmoor were seen as the first “port of call” (paragraph 6.5.6) for allocations, which were treated as a constant. These allocations, combined with the Dalton Barracks allocation start to seriously limit the level of development available to be allocated elsewhere. This use of “constants” across the Sustainability Appraisal underlines the process as it fails to justify why these should be maintained in the first instance.
- 2.25. A further concern is the decision making process by which the Sustainability Appraisal determines whether the Plan allocates larger sites (Option 1), three small sites (Option 2) or six smaller sites (Option 3), set out in Section 7 of the SA. The approach was flawed in that Option 3 was handicapped by the relative weaknesses of individual sites, which made up the option against the assessment criteria.

Housing Allocations Strategy

- 2.26. The approach adopted in Part 2 looks to provide an additional 2,020 dwellings in the Abingdon-on-Thames sub-area. This approach is limited to providing housing at a total of six sites, spread across four separate villages; namely East Hanney, Kingston Bagpuize with Southmoor, Marcham and Shippon. Webbbpaton considers the approach as focusing new development on a handful of locations in this part of the



District and is clearly contrary to the “key strand” set out in Figure 4.1 of Part 1 in providing housing in rural areas.

- 2.27. This undermines the ability of Larger Villages not identified for additional housing within the Plan to accommodate modest levels of growth to support the vitality of settlements in accordance with paragraph 55 of the Framework. As such Webbpaton considers the approach unsound.

The Contribution from Dalton Barracks

- 2.28. Since the summer 2017 consultation, further information has been provided to support the Council’s position that Dalton Barracks is a deliverable site within the Plan Period. This goes some way to address previous comments. However, it is not clear from the document as to when the site will be formally released and the timing of any planning application. Whilst the Council’s Topic Paper on Housing Trajectory makes it clear that there is a start on site in 2023/24 (five years from now) it is not known what form of commitment the MOD has given that the actual site will be vacated in time and whether the delivery programme works with the MOD drawdown from the site. Any delay in this happening could result in housing land supply difficulties for the Council.

Changes sought

- 2.29. Webbpaton’s land at Longworth and Shellingford is allocated for development.
- 2.30. Consequential amendments are made to Figure 2.2, showing Webbpaton’s land allocated for development.

Core Policy 8b Dalton Barracks

- 2.31. Webbpaton considers the allocation of the site to be unsound as it fails to be effective in that it will not deliver housing to the levels anticipated by the Plan, during the Plan period.
- 2.32. In terms of the deliverability of the site, whilst further information has been provided about the delivery rates from the site, of the site assuming that it is successfully allocated, questions have to be raised in respect of its deliverability within the Plan period and therefore the soundness of the Plan in that:
- It makes no account of the timetable to adopt the Local Plan or subsequent SPD.
 - It does not take into account the time to prepare and submit a planning application, along with the time required to determine the application and any subsequent judicial review period.



- It is understood that the MoD will vacate the site in 2029. However, there is no information about how the site is phased to ensure that development can commence notwithstanding a military presence in the intervening period.
- No data is provided about the deliverability of the site, in that is it owned by a developer or a land promoter who will need to sell the site to a developer. If it is the latter, what assumptions are made about the timetable for running such a sales exercise? Experience of the MoD Ashchurch Site in Tewkesbury Borough has highlighted the sometimes 'fickle' nature of the MoD where long-standing redevelopment proposals are rendered redundant because of the MoD's desire to maintain a site for operational purposes.
- Time taken to prepare and submit reserved matters application by the house builder concerned. Based on industry research, it is understood that a site of this size would not start delivering housing until 4 to 5 years after the point that outline planning permission is granted.
- The need for infrastructure and the timetable of that delivery. It is clear from the Appendix site template that there area number of significant highways, ecology and other environmental issues which need to be assessed in any application, along with setting out exactly the level of infrastructure required to support the site's development.
- The evidence supporting the allocation is weakened by the Policy's requirements for a series of technical studies to support any planning application. Part 2's supporting "Topic Papers" do not provide sufficient evidence that the true nature and extent of the level of infrastructure required to support the development has been yet properly considered. The County Council response on p 161 of the consultation statement is notable in that it considers "site delivery is overoptimistic". As a major partner in seeing the site come forward, the OCC response raises serious question marks about the timing of delivery.

2.33. As a result of the above, whilst the site may make an important contribution to housing numbers, given the above, it cannot be seen as making any meaningful contribution to housing land supply.

Changes Sought

2.34. Deletion of Dalton Barracks policy and consequential amendments to Figure 2.2 and other related planning policies.



3.0 Site Allocation Statement

3.1. Webbpaton's position is that the purpose of this statement is to set out the case for the development of its land at Longworth and Shellingford. The red line site location plans are attached, as **Appendix A**. Webbpaton's aim is to have the site allocated for housing development. In seeking the allocation of this site for housing, this part of the statement covers the following:

- The need for housing in Longworth and Shellingford.
- The technical merits of the sites.

3.2. Each is addressed in turn below.

Longworth

The need for housing in Longworth

3.3. Longworth is situated in the Abingdon-on-Thames and Oxford Fringe Sub-Area and is classified as a 'Smaller Village' in Part 1 of the Local Plan. As a smaller village, Longworth is deemed to have '*a low level of services and facilities*' and therefore development '*should be modest and proportionate in scale and primarily be to meet local needs.*' However, whilst Longworth is classed as a smaller village, it contains a good level of services and facilities, which include a primary school, a place of worship, a public house, a library, a village hall, access to a bus service, employment opportunities and outdoor recreational facilities.

3.4. In addition to the above, Longworth is located in close proximity to Kingston Bagpuize with Southmoor, which is designated as a 'Larger Village', and will be subject to a considerable level of new development. A modest allocation at Longworth could relieve some of the pressures on Kingston Bagpuize with Southmoor whilst also helping to maintain the vitality of Longworth. In addition, similar to Kingston Bagpuize with Southmoor, Longworth is conveniently located to the A420 and its excellent public transport connectivity to Swindon and Oxford.

Technical merits of the site

3.5. The site is well contained on all side and is not subject to any formal landscape designation. Furthermore, the site is not at an unacceptable risk of flooding. Access to the site could be gained from either Pine Woods Road to the wets or off the existing access to Frilford Farm off Hinton Road.



Shellingford

The need for housing in Shellingford

- 3.6. Shellingford is situated in the Western Vale Sub Area and is classified as a 'Smaller Village' in Part 1 of the Local Plan. Again, the failure of Part 2 to allocate any additional housing within the Western Vale Sub-Area further undermines the ability of Shellingford to accommodate modest levels of growth to support its vitality in accordance with paragraph 55 of the Framework.
- 3.7. Whilst Shellingford is classed as a smaller village, it also contains a surprisingly good level of services and facilities, including a primary school, a place of worship, a library, a village hall and employment opportunities. The village is also served by a bus service.

Technical merits of the site

- 3.8. The land in question is located to the north west of B4508 Fernham Road, close to the centre of the village. The land is not subject to any formal landscape designation and is not at an unacceptable risk of flooding. The site is also not located within the Shellingford Conservation Area.
- 3.9. Whilst the site lies adjacent to Ancient Woodland and a Local Wildlife Site, it is envisaged that any development would be very modest and take the form of simple frontage development facing Fernham Road. This would ensure that any development respected the existing linear pattern of development within Shellingford, whilst ensuring that there would be no impact on the Ancient Woodland and ecology. There would also be an opportunity to accommodate some community facilities to the rear, such as recreational space for example, thus providing further benefits to the wider residents.

Conclusions

- 3.10. The purpose of this Section has been to set out Webbpaton's position and in accordance with the evidence base; Webbpaton's site at Longworth and Shellingford should be allocated for housing.



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Promotional Land at Home Farm

