



**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](mailto: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

Mr

First Name

David

Last Name

Molland

Job Title (where relevant)

Group Estates & Property  
Manager

Organisation representing  
(where relevant)

FCC Environment

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

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

Mr

Martin

Pollard

Associate Director

Axis

Camellia House

76 Water Lane

Wilmslow

SK9 5BB

01244 555001

[martinpollard@axisped.co.uk](mailto:martinpollard@axisped.co.uk)

## 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

4a & 15a

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) Complies 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.

The Council's approach to selecting the two residential site allocations in the South-East Vale Sub Area is unsound as it was not based on proportionate, accurate and up-to-date evidence. We do not believe the Council has fully considered all reasonable and realistic alternative sites, thus the Plan is not justified.

As part of their site selection the Council considered a large site within FCC's landholding which is undeliverable due to historic landfill use. Having regard to reasonable alternatives and based on proportionate evidence, an alternative site within FCC's landholding to the east of Sutton Courtenay and identified on the enclosed masterplan should have been considered as a prospective residential allocation. If it had been then we firmly believe it would have been found to be suitable and should have been allocated in the Plan, in doing so providing the necessary flexibility to ensure that future development needs can be met.

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.

A large site on the north eastern part of FCC's landholding was considered at the Preferred Options Stage as a potential housing allocation. The Site reference is APPF\_A. The site was

discounted at the Preferred Options Stage for mainly transport and environmental related reasons. The evidence base Topic Paper explains that no comments were received at the Preferred Options Stage in respect of the Site and therefore the Council's recommendations to discount the Site remained, hence it is not allocated in the Publication Stage Plan. FCC was not aware that a site within their landholding was being considered as a potential site allocation, if they had been then they would have made it known that the site under consideration was not deliverable for geotechnical reasons. A more sustainable, demonstrably suitable and deliverable site is available within FCC's landholding. FCC is in discussions with the Didcot Garden Town Development Team, promoting a development masterplan for the site which includes the prospective residential allocation.

### The Masterplan

FCC owns a large area of land directly to the north of Didcot as identified on the attached plan. This is known as Sutton Courtenay Integrated Waste Management Facility. The site has planning permission for a range of operations directly related to historical non-hazardous landfilling. This includes mineral extraction, green waste composting, gas management, aggregate processing and materials recycling. It is, in effect, a complex of bespoke inter-related resource management facilities. The site covers 263 hectares.

The village of Sutton Courtenay lies within 250 metres west of the site; whilst the village of Appleford is less than 200 metres to the east of the site boundary. Directly to the south is the former Didcot Power Station complex, to the east of which is the Didcot Park warehouse and distribution centre. North of the site is predominantly agricultural land, part of which has consent for further mineral extraction. A new housing development with outline consent for circa 140 properties borders the northern boundary on Appleford Road, known as Heritage Park. Heritage Park is set adjacent to a Taylor Wimpey housing development granted in 2011 and forms a natural eastern expansion of Sutton Courtenay.

Developing in areas subject to historical and ongoing waste disposal presents a number of technical issues. The illustrative masterplan identifies development opportunities that could realistically come forward taking these technical constraints into account. It is for these reasons that the masterplan does not promote permanent built development on the part of the site referred to as Site APPF\_A within earlier versions of the Plan. That particular site does not form a viable development opportunity for housing and should never have been considered by the Council as a potential option. However, as stated above and illustrated on the enclosed masterplan, other deliverable options do exist.

The Masterplan identifies approximately, 13 hectares of new housing being proposed to the east of Sutton Courtenay and south of the B1406. This could accommodate c440-500 residential units at a density of 35-40 dwellings per hectare. Historically, this area has consent for landfilling with non-hazardous wastes; however, the environmental permit has recently been amended (2015) to provide for the import of soils to create a development platform, which will be delivered within the current plan period. Accordingly, it could be brought forward as a potential residential site with relative ease. This area of possible future development land relates well to the existing housing development on the edge of Sutton Courtenay and existing open space at Millennium Common. Open space provision could also be provided to the east or west of the future housing land, as shown on the masterplan. The residential development could also help bring forward proposed cycleway/ bridleway links between Sutton Courtenay and Appleford.

The FCC site should be identified as an additional allocation under Policy 4a and 15a of the Plan.

**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:

To ensure the full merits of FCCs site can be presented / discussed.

**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:

17/11/17

### 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

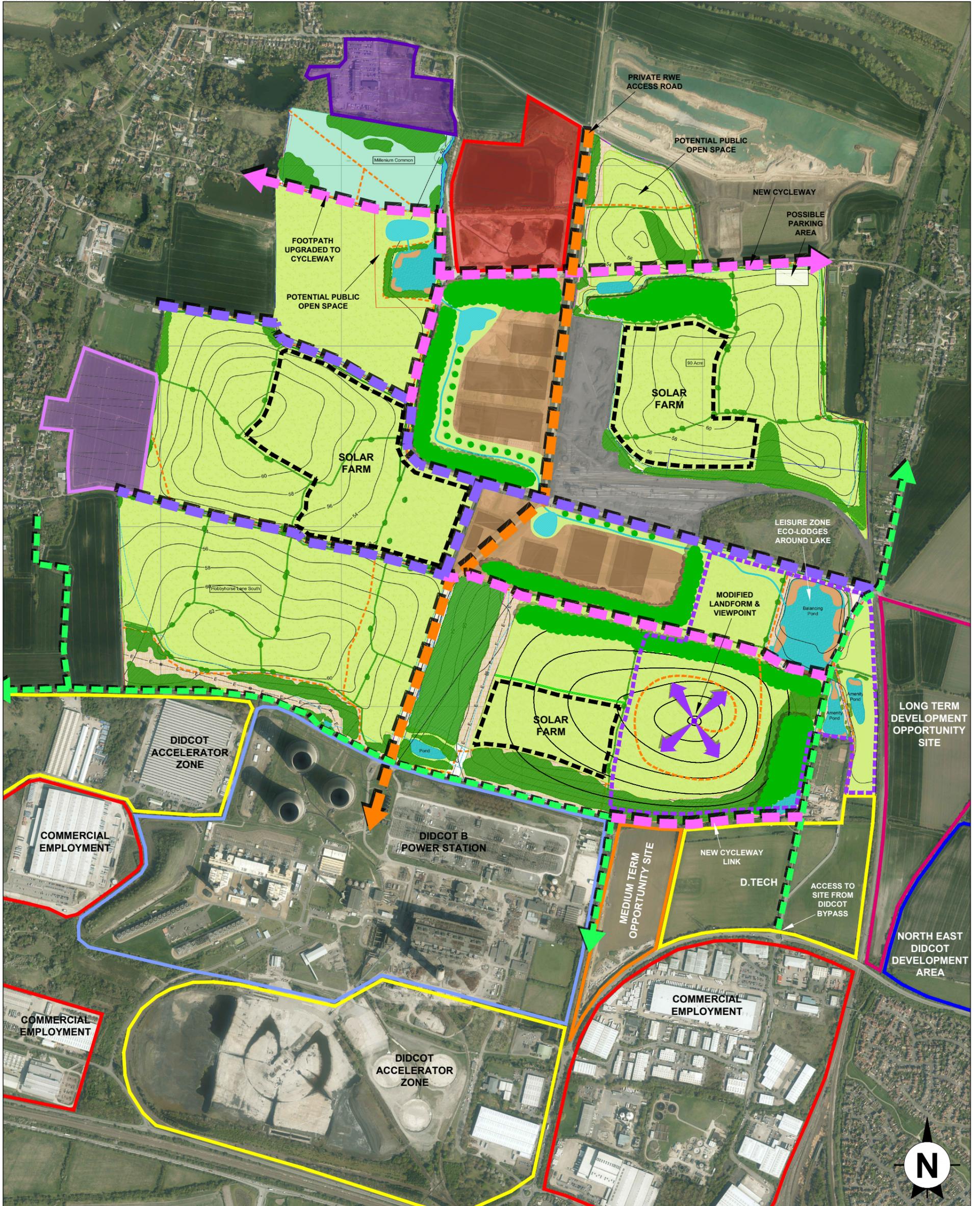
I would like to be added to the database to receive general planning updates

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](mailto:planning.policy@whitehorsedc.gov.uk)

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	Proposed Residential	Existing & Proposed Public Rights of Way	SUDS	DIDCOT GARDEN TOWN REPS	
	Energy Hub, Biomass, Storage	Existing B.O.A.T	Existing Housing Development	Figure 1	
Existing Industrial	Proposed Cycleway / Bridleway Link	Existing Bridleway	Strategic Housing Allocation	FCC Masterplan	
Solar Energy	Power Station retained road with rights across	Leisure Zone	Scale 1:1000@A3	Date August 2017	