



**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	Norman
Last Name	Matthews
Job Title (where relevant)	
Organisation representing (where relevant)	RH Systems
Address Line 1	
Address Line 2	
Address Line 3	
Postal Town	
Post Code	
Telephone Number	
Email Address	

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

Mrs
Sarah
Kasparian
Principal Planner
Bell Cornwell LLP
The Print Rooms
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Southwark
London
SE1 0LH
0203 176 2792
skasparian@bell-cornwell.co.uk

**Sharing your details:** please see page 3

## Part B – Please use a separate sheet for each representation

Name or organisation: Bell Cornwell LLP on behalf of RH Systems

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) 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.

PLEASE SEE ATTACHED LETTER

(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 LETTER

(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 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:

### 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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**bell cornwell**

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Planning Policy Team  
Vale of White Horse District Council  
135 Eastern Avenue  
Milton Park  
Milton OX14 4SB

Our ref: 8380/SK

**By email to [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)**

**22 November 2017**

Dear Sirs

**Representations to the Local Plan Part 2 on behalf of RH Systems**

We write on behalf of RH Systems. This letter supplements the enclosed representation form with regard to the Regulation 19 consultation on the Local Plan Part 2 (Detailed Policies and Additional Sites).

The following text relates to representations on various paragraphs and policies of the Local Plan Part 2 pre-submission version, and responds to questions 3, 4, 5 and 6 of the representation form.

**Core Policy 20a: Housing Supply for Western Vale Sub-Area**

We do not consider the Local Plan Part 2 (Oct. 2017) to be sound as it is not effective or consistent with national policy; and is not in compliance with the Duty to Cooperate.

*Duty to Cooperate:*

Core Policy 20a is not sound as it does not take into account the very close relationship of this sub-area with Swindon and the wider Swindon Borough. It is acknowledged in the Plan that the sub-area is less detached from Oxford and the eastern side of the plan area. However, there is a very close spatial relationship of larger villages, particularly Shrivenham to Swindon as the largest and closest city. Swindon provides considerable employment to residents in the Western Vale sub-area which has not been acknowledged in this policy or the proceeding text.



Given anticipated employment growth for Swindon and Abingdon there should be logic for proposing a higher level of housing growth in the Western Vale sub-area. It is acknowledged that employment growth would not be sustainable in the Western Vale due to it being more rural in character than the surrounding area, but that housing here can support significant employment growth in adjacent areas (Swindon and South Oxfordshire).

It is acknowledged that there is an agreed approach in Oxfordshire to address the unmet need arising from Oxford City. We note that para.4.3 of pre-submission version of the South Oxfordshire Local Plan to 2033 says the same phrase as it did in the preferred options stage of their plan: *'...a joint work programme with the other Oxfordshire authorities is still progressing on the scale of Oxford City's unmet needs and how they can be met'*. If South Oxfordshire's emerging Local plan is uncertain or non-committable about the extent of its contributions towards meeting unmet need, we do not consider that the Vale's Local Plan can be found sound where there are unresolved issues regarding housing requirements and housing supply.

NPPF para.182 states that for a Local Plan to be found sound various tests need to be met, one of which is that they must be *'positively prepared'*. To meet this test, plans need to 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'*.

This is critical issue for the soundness of the Plan. It is fundamental that the authorities know what housing number they must plan for or they cannot make sufficient allocations to make this requirement. Without resolving this issue, it is debateable about whether any of the Oxfordshire Plans can succeed as they cannot be said to have been prepared in accordance with the Duty to Cooperate with such a substantive issue unresolved.

It is unclear how the South Oxfordshire Local Plan will progress, given that the pre-submission version still proposes to release large areas of Green Belt for development – a move that seems out of step with the direction of Government policy as set out in the recent (February 2017) Housing White Paper which seeks to protect the Green Belt. It may be that as the plan



progresses, South Oxfordshire will seek to allocate some development outside of its own boundaries, in more suitable areas not in the Green Belt.

The Plan also fails to satisfactorily address cooperation with Swindon Borough Council particularly in relation to the housing and employment market areas for the Western Vale. We understand that Swindon are in an earlier stage of the plan making process compared to the Vale, however demonstration needs to be made that Councils have worked together to deliver a more suitable level of growth.

*Sustainability Appraisal:*

Part of the previous sustainability justification for the Western Vale housing target was on the basis that it would be in easy access and close proximity of employment opportunities. There is a sustainable development argument to be made in terms of providing additional housing alongside this employment growth. The preparation of Part 2 should have been an opportunity to proactively review the numbers for settlements in Western vale. We therefore do not consider that the housing growth level is sufficient in Western Vale based on the target set out in the Local Plan Part 1, and the alternative of such has not been sufficiently assessed through the Sustainability Appraisal.

*Housing requirements and distribution:*

Housing growth in the Western Vale should be higher and distributed across the market town of Faringdon and five large villages. There is more capacity within and adjacent to these settlements to accommodate development across a range of sites that could be delivered over the plan period rather than in on fewer and larger individual sites. This scenario has also not been assessed through the sustainability appraisal, and would be a positive approach that would assist in adding the necessary flexibility into the housing numbers in a sustainable location.

More flexibility needs to be incorporated into the housing numbers in order for the Council to deliver what it is required to. Local Plan Part 2 version is overly optimistic about the number of homes that can be accommodated in large strategic sites and more emphasis should be



placed on smaller development sites. The Statement of Consultation relies on the fact that less than a 10% buffer has been added to the housing target. A 10% buffer or more should be added, due to normal lapse rates, and local housing market fluctuations. Additional flexibility is recommended on housing numbers in order to maintain a robust 5-year housing land supply position across the plan period in order to defend against speculative applications.

A number of the allocations lie within close proximity to one another which is an issue in terms of the ability of the market to deliver this number of dwellings. For example, Farringdon, which lies within the Western Vale, has strategic allocations totalling nearly 1,000 dwellings. Given the scale of Farringdon, this approach is likely to flood the market and prove a challenge for developers to deliver in a timely manner.

The County of Oxfordshire is constrained overall and there are large areas of the District which lie within the Green Belt and Area of Outstanding Natural Beauty (Chilterns, Cotswold and North Wessex Downs). Our client's site in Shrivenham is a large village and does not have these constraints, and we consider that the Council's approach to the development of the Western sub-area is therefore an unsound one. Given the area's lack of constraints it has the capacity to accommodate more development. It is unclear why the Western Vale sub-area has only been allocated strategic sites, when more modest levels of development in a variety of sustainable locations would be easier to assimilate and to deliver.

*Land adjacent to Townsend Road, Shrivenham:*

Our client's site lies to the south of Shrivenham, which is located within the Western Vale sub-area of the District. Within the Part 1 Local Plan, Shrivenham is identified as a larger village within the second tier of settlements in the Western Vale in terms of sustainability and a strategic housing site for about 500 dwellings (Highworth Road, Shrivenham) is included within the Local Plan Part 1. It is described elsewhere in the Part 1 Local Plan as a focus for growth within the Western Vale. Shrivenham has good accessibility to other parts of Oxfordshire and Wiltshire due to its proximity to the main A420, which is a primary route running between Bristol and Oxford.



The site is included within the Council's Housing and Employment Land Availability Assessment (HELAA), with the site forming the main part of site reference SHRV15 (Land to the south of Townsend Road). The site scored well in this assessment, and was considered to be suitable and achievable. At that point it was not considered available as it was not being promoted for development.

The site would be accessed off Townsend Road, which is the main road into Shrivenham. The site lies outside of, but adjacent to, the currently defined built up area of Shrivenham and has good access to the facilities and services of the village. It is currently used for grazing land for several horses, with small stables in the North-West corner of the plot. The site is bound with hedgerows on all sides, and landscaping would be considerably enhanced as part of any detailed proposal for the site.

The site would be appropriate for allocating within the Part 2 Plan. It is very well located between existing areas of development to the east and west of the site. Core Policy 4, sets out that *'Development outside of the existing built up areas....will be permitted where it is allocated by the Local Plan 2031 Part 1 or has been allocated within an adopted Neighbourhood Development Plan or future parts of the Local plan 2031. The development must be adjacent to, or well related, to the existing built area of the settlement or meet exceptional circumstances set out in the other policies of the Development Plan and deliver necessary supporting infrastructure'*. In terms of this site, we consider that a case can be made for it being well related to the existing built up area of the settlement of Shrivenham – therefore there is nothing to prevent it being allocated for development in Local Plan Part 2.

The site is deliverable in terms of footnote 11 of the NPPF – i.e. the site is available now, offers a suitable location for development now, is achievable and viable and that our client is keen to deliver the site at the earliest possible opportunity. It would be able to make an immediate contribution to meeting the District's housing requirements, including the Oxford and Swindon overspill.



### *Potential modifications*

We suggest that due to significant changes anticipated to national planning policy in Spring 2018, if the Part 2 plan were to be adopted, work should commence on a review immediately on the update to housing numbers in the area, with particular focus on Western Vale. Both Part 1 and 2 versions of this Local Plan will soon be out of date, particularly in light of the 2014 dated Strategic Housing Market Assessment.

The Sustainability Appraisal does not assess the option of further housing development in Western Vale at all. The only scenario assessed is that which has already been allocated or committed. Due to the lack of cooperation and cross-boundary planning with Swindon, alternative scenarios and sites should be explored.

With regard to modifications, it is clear that further work is required together with Swindon on housing and employment growth. Amendments should subsequently be required on the distribution and level of growth for market and larger villages in Western Vale, with an appropriate sustainability assessment. Additional requirements should be added to the plan that requires the Council to undertake an immediate review of the housing market area, with a view to addressing the housing targets for sub-areas.

### **Development Policy 1 on self-build and custom build**

We consider the Local Plan Part 2 (Oct. 2017) to not be sound as it is not consistent with national policy and is ineffective.

The proposed wording of the policy does not provide sufficient clarity on what would be required by development proposals where such plots 'may' contribute towards affordable housing provision. This does not provide sufficient clarity of certainty or either the applicant or the decision maker. This policy is therefore not in accordance with the NPPF paragraph 17 or 182.

Modifications are required to review the specific wording of this policy to make it clear what is and what is not regarded as affordable housing.



## **Summary**

We have expressed concern at the Council's approach to meeting housing need which we consider to be unsound and not in accordance with the duty to cooperate. There is currently a lack of clarity about the housing numbers which the Vale (and South Oxfordshire) will need to allocate to meet the needs of Oxford City Council. Given the proximity of the Vale of the White Horse to Oxford and Swindon, and the lack of constraints compared to other areas, there is a logic in the West Vale sub-area accommodating a higher percentage of the housing than is currently planned.

Additionally, the Council needs to add more flexibility into its housing numbers and to be realistic about delivery to ensure that it can maintain a 5-year housing land supply position on an annual basis. We continue to be concerned that the Council has a high reliance on strategic sites which are generally very slow to deliver. Allocating additional small/medium sized deliverable sites will help to ensure a robust housing land supply moving forward that is well distributed across the district.

We are promoting our client's land which is outside the AONB and the Green Belt. The site is suitable and available for development. We have demonstrated that the site is deliverable in the short term without landownership constraints, therefore being capable of making an early contribution to meeting housing needs.

We trust that these representations are helpful and would ask that further consideration is given to our client's land adjacent to Townsend Road, Shrivenham.

Yours faithfully

**BELL CORNWELL LLP**

**Sarah Kasparian**  
Principal Planner