

VoWH Local Plan Part 2 Examination: Matters and Questions

Dandara Ltd Hearing Statement (Respondent ID: 758199)

Introduction

- 1.1 This Hearing Statement has been prepared by Dandara Ltd who are promoting land located to the West of Wantage for residential led, mixed-use development alongside the delivery of the West Wantage Link Road (WWLR), the route of which was safeguarded within the Local Plan Part 1 (LPP1). The site is not proposed for allocation within the Local Plan Part 2 (LPP2).
- 1.2 The Statement concisely addresses the relevant '*List of Matters and Questions*' (ID/3) and should be read alongside representations made by Dandara Ltd to the emerging LPP2 dated March 2017 and October 2017. As requested, a separate Hearing Statement has been prepared for each matter and question being addressed.

Matter 3 – Housing Provision and Distribution

Question 3.1 – Allocation of Homes in SE Vale Sub-Area

- 2.1 The objectives for the South East Vale Sub-Area are set out from para. 5.52 of the LPP1. This includes recognising that *"the area will continue to be a vital economic area for Oxfordshire, including employment of international importance ..."* alongside *"Wantage and Grove will be places where people are proud to live and work and recognised as a vital part of the Science Vale area. Growth in these settlements will have been balanced alongside the delivery of community facilities. This will have included new schools and significant highway improvements"*.
- 2.2 As we will demonstrate in more detail under Matter 7, the strategy to support economic growth within the LPP2 focuses primarily on the allocation of 1,000 new homes at Harwell campus and 400 new homes at north Grove. Putting aside in principle soundness concerns regarding AONB development, it is considered that this approach places too much emphasis on the unevidenced benefits of immediate geographical proximity to jobs and no wider consideration of the overarching spatial strategy for the South East Vale Sub Area set out in the LPP1.
- 2.3 The two allocations proposed are at the periphery of the sub-area and do little to contribute to the wider objectives of making the sub-area a sustainable community which builds upon and facilitates the outstanding employment opportunities available. As the main 'market town' any allocations within the LPP2 should be building upon and supporting the sustainability credentials of Wantage as the principal sequentially preferable location for growth under Core Policy 3 of the LPP1.
- 2.4 The unevidenced rejection of land West of Wantage has resulted in the exclusion of a site which is not located within the Green Belt or AONB; is sustainably located immediately adjacent to the settlement boundary of Wantage as a 'market town'; delivers a significant piece of safeguarded infrastructure in the WWLR that connects the Western Vale Sub-Area with employment opportunities to the east; and would otherwise contribute to enhancing the vitality and viability of Wantage as a major settlement within the Vale.

Question 3.2 – Western Vale

- 3.1 It is noted that the evidence base to the LPP2 – see Appendix A of the Site Selection Topic Paper for East Challow and SA Table A – accepts that because land West of Wantage is located immediately adjacent to the existing settlement boundary of Wantage as a ‘market town’, it has been assessed and considered for housing allocations being made within the South East Vale Sub-Area.

Question 3.3 – Overall Spatial Strategy

- 4.1 As we have demonstrated within our Matter 2 Hearing Statement, the spatial strategy and distribution of development within the LPP2 is fundamentally unsound due to the unevidenced and unjustified approach of locating the majority of development within close geographical proximity to both Oxford City (from an unmet need perspective) and Harwell (from an employment perspective).
- 4.2 Fundamentally, the LPP2 (paras. 2.18 and 2.31), LPP2 evidence base (paras. 4.7 and 4.8 of Oct ’17 Site Selection Topic Paper) and LPP1 Inspector’s Report (para. 25) accept that the LPP1 and LPP2 will jointly deliver 2,200 new homes to assist Oxford City under the DtC and that this need could be delivered anywhere across the Abingdon-on-Thames / Oxford Fringe and South East Vale Sub-Areas. As the LPP1 has already allocated 4,500 new homes which would be available to those who may be unable to buy in Oxford City, there is absolutely no justification for the LPP2 diverting from the spatial strategy established within Core Policy 3 of the LPP1.
- 4.3 However, rather than the LPP2 focusing additional development within the most sustainable ‘market towns’ identified within Core Policy 3 of the LPP1, the Council has contrived to locate new homes in closest geographical proximity to Oxford City due to a misguided presumption that this is justified to address the 2,200 unmet need figure. A similar approach has been taken for Harwell where the LPP2 is proposing to locate 1,000 new homes in the AONB with the misguided assumption that future employees are required to live immediately adjacent to potential jobs regardless of wider sustainability considerations.
- 4.4 This contrived and ultimately misguided approach to locating development has resulted in the LPP2 directly conflicting with the spatial strategy and vision for the distribution of development established within the adopted LPP1. This has manifested itself in the fact that, as recognised at para 10.3.2 of the SA “... *no LPP2 allocations are proposed at a market town (Abingdon, Wantage, Faringdon)*”. Furthermore, the LPP2 only allocates one site, at North-West Grove, which is located adjacent to a settlement characterised as a ‘local service centre’ which is placed second within the Core Policy 3 settlement hierarchy behind the three ‘market towns’. Instead, six of the seven allocations proposed within the LPP2 are located adjacent to settlements characterised as either ‘larger villages’ or ‘smaller villages’.
- 4.5 The LPP1 established a spatial strategy and settlement hierarchy for a reason, namely to ensure the achievement of sustainable development as defined by para. 7 of the NPPF by locating development at those settlements with the best range of shops, services, employment opportunities and access to public transport modes. The spatial strategy proposed within the LPP2, by virtue of diverting significantly from that evidenced and established within Core Policy 3 of the LPP1, leads to a range of soundness and environmental conflicts.

- 4.6 Section 9.0 of our representations to the publication version VoWH LPP2 considers a range of deficiencies associated with a number of the LPP2 proposed allocations which are a direct result of the contrived LPP2 spatial strategy which focuses more importance on unevidenced geographical proximity to Oxford City and the Harwell Campus than according with the adopted LPP1 spatial strategy and approach to distribution of development – an approach found sound and subsequently adopted. As our publication version representations are available to the Inspector we will not repeat the points here other than to summarise the main headings:

Settlement Sustainability – The spatial strategy resulting in no allocations being made at ‘market towns’ with six of the seven allocations proposed within the LPP2 being either ‘larger villages’ or ‘smaller villages’ with a general lack of services and reliance upon higher order centres thus increasing reliance on the private car;

Deliverability – The spatial strategy relying on sites including Dalton Barracks and North-West Grove whose deliverability has not been demonstrated either due to extant uses and uncertainty regarding disposal and remediation (Dalton Barracks) or reliance upon the completion of much-delayed LPP1 allocations (NW Grove).

Infrastructure – The identification of proposed allocations which would not directly deliver but would increase the need for strategic infrastructure improvements whose delivery is not required by the LPP2 (Kingston Bagpuize and A420 improvements and Marcham by-pass);

Development in the AONB – See Matter 7 Statement;

Loss of Enterprise Zone Land – See Matter 7 Statement;

Development on Green Belt Land – See Matter 2 and 5 Statements;

Air Quality – The spatial strategy proposing the delivery of additional housing in the village of Marcham which has known constraints regarding highway capacity and associated air quality, including the designation of an AQMA;

Heritage Impact – The spatial strategy proposing development at Kingston Bagpuize that would have a detrimental impact on the setting of a Grade II* listed building, Conservation Area, Old Oxford Road and the Aelfrith Ditch;

Local Infrastructure – The spatial strategy proposing significant new housing in village locations that do not benefit from the necessary infrastructure including increasing capacity of existing services to address demand.

- 4.7 Section 9.0 of our representations to the publication version VoWH LPP2 clearly demonstrates that the distribution of new housing proposed within the LPP2 is unevidenced, unjustified and based on a fundamentally unsound principle that prioritises geographical proximity to Oxford City and Harwell above a collective consideration of how sustainable development can be achieved following the spatial strategy and distribution of development found sound and adopted within the LPP1. This approach has focused significant housing numbers in unsustainable, isolated locations resulting in a range of social, environmental and economic consequences that cumulatively result in an unsound Plan.

Question 3.4 – Housing Supply Ringfence

- 5.1 If housing supply for the Science Vale continues to be ringfenced, it is requested that the LPP2 makes it clear that development surrounding the most sustainable settlements will be supported in the case of a shortfall even where the ringfence boundary is drawn tight against the settlement edge as is the case to the west of Wantage.