

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)	Welbeck Strategic Land
Address Line 1	
Address Line 2	
Address Line 3	
Postal Town	
Post Code	
Telephone Number	
Email Address	

2. Agent's Details (if applicable)

Mr
N
McLoughlin
Managing Director
McLoughlin Planning
North Warehouse
Gloucester Docks
Gloucester
GL1 2FB

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Welbeck Strategic Land

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

(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

(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:

To examine the issue of the Plan's failure to recognise the ability of housing sites in the Western Vale sub-area to deliver additional units.

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.**

Please see attached document

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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MP Ref: NM/0355
Email: nathan.mcloughlin@mplanning.co.uk

21 November 2017

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

Dear Sir/Madam

**Vale of White Horse Local Plan Part 2
Representations on behalf of Welbeck Strategic Land**

McLoughlin Planning is instructed by Welbeck Strategic Land (WSL) to make submissions on the Vale of White Horse Local Plan Part 2 in respect of its land and development interests at Faringdon. A site location plan is appended to this letter (Appendix A), which identifies the land in question and the latter part of this representation sets out the planning situation with the land, part of which has planning permission, part of which is allocated for development as well as a remainder which is not allocated for development, but available nonetheless.

At this stage, WSL considers that there is greater need for clarity in the Plan as to its relationship with 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.

In these earlier stages, Part 2 was anticipated to be a small site allocations DPD, dealing with non-strategic (i.e. sub-200 dwellings) development sites in village locations. However, it is clear from the EiP and subsequent Inspector's Report that this original aspiration has been modified 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. Welbeck considers the approach and allocations made are contrary to the original purpose of Part 2.

WSL wishes to make a joint representation on both Core Policy 4a and Core Policy 8a. It considers that there are elements within which that are unsound and these are explored below.

Core Policy 4a

WSL's position on Core Policy 4a is as follows:

WSL objects to the reference in the Policy that the Plan will not make additional allocations in the Western Vale. Such an approach is considered unsound in that it is not based on an appropriate evidence base.



Part 1 of the Plan sets out the 'spatial strategy', which has three main strands. These are:

- Focus sustainable growth within the Science Vale area
- Reinforce the service centre roles of the main settlements across the district
- Promote thriving villages and rural communities whilst safeguarding the countryside and village character.

With this strategy in mind, 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. Part 2 does not allocate any housing at all within the Western Vale Sub-Area. The Sustainability Appraisal fails equally to consider other opportunities in the Western Vale Sub-Area. Despite the fact that housing supply in the sub-area is not ring fenced.

Whilst it is acknowledged that Oxford's unmet need is to be met in the Abingdon-on-Thames and Oxford Fringe Sub-Area and the South East Vale Sub-Area only, this requirement only amounts to 2,200 dwellings. It is WSL's position that the balance of dwellings to be delivered in Part 2 of the Plan, to meet the needs of the district (1,840 dwellings as set in in Core Policy 4 of Part 1), should be distributed across all three Sub-Areas. Given that Faringdon is the largest settlement within the Western Vale Sub-Area and functions as the main service centre of the surrounding rural catchment, additional housing directed at Faringdon will ensure that this role is maintained. This will also fulfil one of the main strands of the Plan's spatial strategy (i.e. 'reinforce the service centre roles of the main settlements across the district').

Core Policy 8a

In terms of the deliverability of the Dalton Barracks, serious questions have to be raised in respect of its deliverability within the Plan period 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 it is 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 are a 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.*

As a result of the above, the evidence in Part 2 is insufficient to support its position that it will deliver 1,200 units during the remainder of the Plan period, and that there is a need for alternative locations to be found elsewhere within the District.

Overall Conclusions and Change Sought

Part 2's considerable reliance on strategic level allocations could affect the Council's ability to demonstrate a five-year supply of deliverable housing if these strategic allocations are delayed for any reason. It is of note that the Inspector's Report for Part 1 of the Local Plan concluded that there was a benefit in the housing supply comprising a mix of site sizes. The skewing of the Plan in favour of fewer strategic sites could therefore affect the projected delivery.

To help with this, it is also of note that whilst land at west of Coxwell Road is already shown as being allocated for 200 dwellings in Part 1 of the Local Plan (allocation 16), a recent outline planning application for up to 200 dwellings together with Green Infrastructure, surface water attenuation and a new access from Coxwell Road was permitted in May 2016 (application Ref: P15/V1934/O). This application only utilised approximately half of the allocation shown (please see illustrative masterplan attached as Appendix B). Consequently, there is now a good opportunity to increase the number of dwellings at this allocation whilst negating the need to allocate any further land at Faringdon.

Furthermore, it can be seen from the subsequent Bellway implementation of the Reserve Matters consent at this site that sites of circa 200 units are attractive to the market and are not hindered by the timing of major pieces of infrastructure. In order to maintain a supply of housing and assist the Council in meeting its housing needs, it is considered that Core Policy 4A should be adjusted to reflect the fact that existing allocations will be carried forward in the Western Vale and where possible, delivery from them will be maximised.

In terms of precedent for this, as acknowledged in Table 2.1 of the Plan identifying an over-delivery of 150 dwellings on the North Abingdon LPP1 allocation. It is considered that a similar principle is acceptable here. The necessary alterations should be put into Core Policy 4a to recognise the contribution of additional housing at the existing Steeds allocation.

In light of the above soundness concerns, WSL wish to have the opportunity to put further evidence on this issue to the Inspector at the EIP.

Yours faithfully

Nathan McLoughlin BSc (Hons) DipTP MRTPI
Director



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Site Boundary

6.81ha

Residential
[up to 150 dwellings]

4.28ha

Access

Potential Pumping Station

Existing and Approved Vegetation

Potential Planting

Bio-retention Area

Green Interface with the Great Coxwell
Green Buffer (NP Policy EDQ1)
[26m at narrowest point]

Swale

Footway/Cycleway
[connecting to The Steeds Development]

Diverted Drainage Channel

Water Attenuation delivered by others

Play Area

Play Area delivered by others

Category of Open Space	Requirement	Framework shows
Children's Play and Youth Provision	0.25ha per 1000 [0.09ha required]	0.09ha
Public Open Space	15% residential area [0.64ha required]	2.53ha
Sub Areas within the Public Open Space		
Bio-retention Areas	-	0.65ha
Woodland / Structural Planting	-	0.20ha

Standards taken from Vale of White Horse District Council Local Plan 2031 Part 2 (Consultation Draft March 2017) Appendix F: Open Space Standards and Leisure and Sports Facilities Standards. Calculations based on 150 dwellings and 360 population (@ 2.39 persons per dwelling)

N