
Representations to the Vale of White Horse District Council in the matters relating to the Local Plan 2031 Part 1: Strategic Sites and Policies Publication Version November 2014

Prepared on behalf of Williams Grand Prix Engineering Limited

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1. INTRODUCTION

- 1.1 Strutt and Parker LLP act on behalf of Williams Grand Prix Engineering Limited (“**Williams**”). We hereby make representations to the Vale of White Horse District Council Local Plan 2031 Part 1: Strategic Sites and Policies Publication Version November 2014 (“**LP 2031**”).
- 1.2 Williams is a leading Formula One (“**F1**”) team with a global brand. They are also one of the District Council’s major employers. The founder of Williams, Sir Frank Williams, describes the company as *“a world class engineering company who happen to go racing”*.
- 1.3 Williams own and control the land edged red on the plan attached at **APPENDIX A**. The majority of this land falls within the identified mixed use allocation known as Monks Farm (North Grove) which, to date, has been promoted jointly by Gallagher Estates and Gleeson Strategic Land with Williams’ informal agreement.
- 1.4 The purpose of this submission is principally to acknowledge Williams’ support for the identification of their landholding as part of the Monks Farm (North Grove) strategic allocation.

2. THE ROLE OF THE LOCAL PLAN

2.1 At the heart of the National Planning Policy Framework (“**the Framework**”) there is a presumption in favour of sustainable development. This presumption should be seen as a golden thread running through both plan-making and decision-taking. Paragraph 14 states that for plan-making this means the LPA should positively seek opportunities to meet development needs with sufficient flexibility to adopt to rapid change, unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- Specific policies in the Framework indicate development should be restricted.

2.2 Paragraph 15 of the Framework sets out that the policies within Local Plans should follow the approach of the presumption in favour of sustainable development so that development which is sustainable can be approved without delay. Paragraph 15 states:

“All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.”

2.3 The core land-use planning principles require the planning system to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

Paragraph 17 states:

“Every effort should be made objectively to identify and then meet the housing, business and other development need of an area and respond positively to wider opportunities for growth.”

2.4 Furthermore the planning system should: [amongst other things]

- (i) Be genuinely plan-led;
- (ii) Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;

- (iii) Promote mixed use developments, and encourage multiple benefits from the use of land; and
- (iv) actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

2.5 Paragraph 150 to 185 of the Framework cover the Government's planning policies for plan-making. Paragraph 150 states:

"Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities."

2.6 Paragraph 151 states:

"Local Plan must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development."

2.7 LPAs are advised to seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three.

2.8 Paragraph 154 states:

"Local Plans should be aspirational but realistic" (emphasis added). They should address the spatial applications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."

2.9 Paragraphs 156 and 157 state:

[156] "Local planning authorities should set out the strategic properties for the area in the Local Plan. This should include strategic policies to deliver: [amongst other things]

- *The homes and jobs needed in the area;"*

[157] “Crucially, Local Plans should:

- Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- Be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date;
- Be based on co-operation with neighbouring authorities, public, voluntary and private sector opportunities;
- Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- Identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- Contain a clear strategy for enhancing the natural, built and historic environment.”

2.10 In terms of the Plan’s evidence base paragraph 158 states:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authority should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”

2.11 In respect of housing, paragraph 159 places a requirement on all LPAs to have a clear understanding of housing in their area having undertaken a Strategic Housing Market Assessment to assess their full housing needs. In particular paragraph 159 states that LPAs should work with neighbouring authorities where housing market areas cross administrative boundaries.

2.12 The Framework also requires LPAs to prepare Strategic Housing Land Availability Assessments within which realistic assumptions about the availability, sustainability

and the likely economic viability of land to meet the identified need for housing over the defined plan period.

2.13 Paragraph 173 states:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making. Plans should be deliverable...”

2.14 Paragraphs 178 to 179 introduces a duty to cooperate with neighbouring authorities to ensure the strategic priorities across local boundaries are properly coordinated and reflected in individual Local Plans.

2.15 Paragraph 182 states:

“....a plan for examination which it considers is sound – namely that it is:

- **Positively prepared** – *the plan should 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 and consistent with achieving sustainable development;*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”*

3. THE SPATIAL VISION AND STRATEGIC OBJECTIVES

3.1 We support in principle the Spatial Vision of the LP 2031, in particular the focus for new residential and economic growth within the Science Vale area. As a local service centre, Grove has a significant role to play in helping to deliver this Spatial Vision. It is a well established planning principle that the supply of new housing is best achieved through planning for large scale development to existing larger villages and towns; especially seeing as though such settlements contain a level of facilities and services and local employment to provide the best opportunities for sustainable development. Accordingly, Williams agrees entirely with Strategic Objective SO3 which states, *inter alia*, that growth is to be directed to the most sustainable location within the District.

3.2 Furthermore, we wish it is to be acknowledged that Williams supports the other Strategic Objectives, especially: [in summary form]

SO1: Provide for a range of homes across the district to deliver choice to meet the identified need, including for affordable housing.

SO2: Cater for existing and future residents' needs including the needs of different groups in the community and provision for a growing older population.

SO5: Support a strong and sustainable economy within the district including the visitor economy.

SO6: Seek to ensure new development is accompanied by appropriate and timely infrastructure delivery.

SO10: Maintain and improve the natural environment.

SO11: Ensure all new development achieves high quality design standards.

3.3 We consider that the proposed Strategic Objectives are positively prepared, justified, effective and consistent with national planning policy.

4. THE SPATIAL STRATEGY

- 4.1 One of the fundamental purposes of the planning system is that society's basic needs are met. It is critical therefore that the Spatial Strategy set out boosts significantly the supply of housing so that the full, objectively assessed needs ("**FOAN**") for market and affordable housing in the housing market area ("**HMA**") can be delivered, as well as securing sustainable economic growth and infrastructure provision.
- 4.2 The notion of five core policies is supported in principle. The five core policies allow the Spatial Strategy to be succinct demonstrating that the LP 2031 has been positively prepared.
- 4.3 We welcome the LPA's proposal to split the district into individual Sub-Areas. This is a recurring theme and practice for many LPAs across the country and appears to be working successfully. It is suggested however that rather than refer to the policies as 'core' policies also, the LPA may – to avoid confusion – prefer to refer to them as 'sub-area' policies.
- 4.4 Under Core Policy 3 (Settlement Hierarchy) we agree with the definition of 'Local Service Centres' and support the identification of Grove as one within the defined South East Vale Sub-Area.
- 4.5 At Core Policy 4 (Meeting Our Housing Needs) it is acknowledged that the LP 2031 makes provision for at least 20,560 homes to be delivered in the Plan period between 2011 and 2031. This is consistent with the evidence base contained within the Oxfordshire Strategic Housing Market Assessment ("**SHMA**"). As such, we are satisfied that Core Policy 4 makes adequate provision to meet the FOAN of the district.
- 4.6 The inclusion of the preceding words "at least" is also welcomed. It is hoped that the LPA will not see 20,560 new homes as a maximum and that they will actively seek to exceed this level of housing delivery – providing development can be accommodated without significant and demonstrable adverse impact. We strongly encourage the Council though to strive to achieve a greater level of housing delivery given the difficulties facing Oxford City in terms of them being able to meet their own identified FOAN.

Land at Monks Farm (North Grove)

- 4.7 Williams supports the identification and inclusion of that land at Monks Farm (North Grove) as a strategic allocation for at least 750 new homes. However, it is submitted that its capacity may well be greater once a detailed assessment has been undertaken. We would encourage the LPA not to resist any increase in delivery.
- 4.8 There are relatively few environmental and/or technical constraints on the delivery of Monks Farm (North Grove). It is submitted the land could be brought forward early in the identified Plan period. The site could reasonably be built out within 10 years from adoption of the LP 2031.
- 4.9 Williams supports the underlying aim and objective of Core Policy 5 (Housing Supply Ring-Fence) which is to safeguard housing delivery in certain areas in the event that the strategic allocations do not come forward as reasonably anticipated. However, what Core Policy 5 does not make clear is whether the assessments of housing land supply will be calculated individual for each respective area¹. This needs to be made clearer within the policy so as to ensure that it is justified.
- 4.10 In respect of Core Policy 6 (Meeting Business and Employment Needs) it is acknowledged that Monks Farm (North Grove) as a new mixed use strategic allocation is expected to provide some 6 hectares of land for employment use. It is not clear from the wording of the policy what is meant or specifically captured by the term “employment” for the purposes of the LP 2031. It is also not defined in the LP 2031 Glossary. It is considered necessary for the Plan to define the term to provide certainty for developers and investors and to prevent confusion at the development control stage. It is assumed from reading the Vale of White Horse Employment Land Review 2013 Update and Addendum 2014 that “employment” is limited to Class B uses. In the absence of a precise definition, the policy fails to accord with paragraph 154 of the Framework which requires Local Plans to only include policies that provide a clear indication of how a decision maker should react to a development proposal to be included in the Plan.
- 4.11 The LPA will be familiar that part of the Monks Farm (North Grove) allocation was, in 2008, the subject of an outline planning application (LPA reference P08/V0527/O) which was eventually dismissed on appeal (PINS reference APP/V3120/A/08/2081990). This development concerned a proposal for Class B1 use.

¹ The respective areas being Grove, Wantage, Chilton, Harwell and Didcot

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The appeal was dismissed by the Planning Inspectorate because of the importance of the major employment sites elsewhere within the district (e.g. Grove Technology Park, Milton Park and Harwell Campus) which were deemed fundamental to the LPA's employment land strategy. It is evident from the Vale of White Horse Employment Land Review 2013 Update and Addendum 2014 that these major sites still have a very significant role in delivering the employment land strategy to 2031 – particularly Milton Park and Harwell Campus given their Enterprise Zone status. Whilst it is acknowledged that employment growth forecasts are strong, especially within the Science Vale area over the Plan period, it is considered that Monks Farm (North Grove) will be a significant less attractive proposition when considering inward investment locally. This, it is submitted, is due fully to the incentives and proximity to the strategic highway networks that other location can offer. Paragraph 22 of the Framework makes clear that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. Instead national planning policy states that regard must be had to “*market signal*” and “*the relative need for different land uses*”. Accordingly, we advocate a more flexible approach to the delivery of employment land to meet market need and the sustainability of Monks Farm (North Grove).

- 4.12 This proposition would be entirely consistent with the Framework allowing proposals – which have had regard to the relevant market signals and the relative need for different land uses to support sustainable local communities – to come forward. Moreover, this would support the desire of the LPA to provide flexibility in employment across the District as well as reflecting paragraph 14 of the Framework that Plans should demonstrate “*sufficient flexibility*” to adapt to rapid change. As such, it is submitted that in addition to Class B uses that Classes C1, C2, D1 and D2 be also recognised as valuable employment generating uses at Monks Farm (North Grove).

5. THE SUB-AREA STRATEGIES: SOUTH EAST VALE

- 5.1 Williams supports in principle Core Policy 15 (Spatial Strategy for South East Vale Sub-Area) subject to there being recognition within the policy that non Class B uses would be capable of delivering new job and economic growth opportunities on the Monks Farm (North Grove) allocation.
- 5.2 The inclusion of Core Policy 19 (Re-opening of Grove Railway Station) within the LP 2031 is not adequately justified. Network Rail has no firm intentions to deliver a scheme to re-open the Grove Railway Station. We submit that Local Plans must remain realistic in their objectives. Thus, Core Policy 19 should be deleted.

6. DISTRICT WIDE POLICIES

- 6.1 Williams supports Core Policy 29. They are committed to growing their existing business operations. Accordingly, the support of the LPA is very much welcomed.
- 6.2 We support in principle Core Policy 31 (Development to Support the Visitor Economy) but recommend that the policy be amended to reflect potential links to the existing Conference Centre on the Williams site at Grove. We submit that there is a scope within the proposed mixed use allocation for new visitor and leisure facilities, such as enhanced Conference Centre, Historic Formula One Car Collection Visitor Centre and accommodation in the form of a hotel.

Appendix A – Site Location Plan

