

Date
17 December 2014

Vale of White Horse District Council
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By Email

Dear Sir / Madam

Vale of White Horse Local Plan Consultation – Publication Version, November 2014 Pond Cottages and Associated Land, OX11 0PG

These representations to the November 2014 draft of the Vale of White Horse (VoWH) 2031 Local Plan, Part 1 have been prepared on behalf of Bernard Green and Giles and Dominic Turnbull who own the land known as Pond Cottages, OX11, edged red on the accompanying site location plan.

Introduction

It is the intention of the landowners to bring forward land at Pond Cottages to deliver up to 10 new homes for VoWH. It is recognised that the site is not of a size which could deliver over 200 new homes and it is not therefore the intention of these representations to put the site forward as a strategic housing allocation to be included in Part 1 of the new VoWH Local Plan.

Instead, these representations highlight the concerns the landowners have in respect of the application of Core Policy 5 of the new Local Plan regarding the Housing Supply Ring-Fence, and the lack of clarification regarding the definition of Harwell Campus within Core Policy 3 Settlement Hierarchy. We believe that without clarification, the policies could prevent a small residential development site being brought forward for new housing in a sustainable and coherent part of the VoWH which has recently accommodated significant new development and has inherently created a Larger Settlement.

Housing Supply Ring-Fence

Core Policy 5 outlines the Council's proposed 'ring-fence' approach to housing supply to help ensure that jobs, homes and infrastructure are provided together. The central planning justification for the ring-fence is that it supports the delivery of the Local Plan Spatial Strategy focus on development in Science Vale, which includes Harwell Campus. The ringfence seeks to concentrate housing growth and infrastructure investment in this location and aims to reinforce the commitment to the Spatial Strategy.

We consider that Core Policy 5 is a positive new addition to the Local Plan and directs growth to the most sustainable locations for development, alongside jobs and infrastructure improvement. The Plan would benefit however from greater clarification as to how this housing delivery sits alongside the housing delivery and strategic allocations within Core Policy 4. For example, Harwell Campus which falls within the ring-fence is described as a Larger Village, within which Core Policy 3 only allows for unallocated development limited to providing for local needs and to support employment, services and facilities within local communities. Conversely, the ring fence policies encourages housing development to support jobs and infrastructure

growth; it is not clear how the objectives of the two policies work together to deliver housing and other new development. The inclusion of allocations within the ring fenced areas would provide a more accurate assessment of likely housing delivery and trajectory over the plan period, and ensure development to the most sustainable locations is secured.

It should also be made clear that housing delivery within the ring-fence areas benefits from that same level of support as that afforded to housing development within the settlement boundaries; the ring-fence policy could arguably form part of Core Policy 4 as the delivery of 11,850 homes comprises a significant part of the Vale's overall housing supply.

Settlement Boundaries

Notwithstanding our recommendation above, we note that several of the areas, mostly notably Harwell Campus, still do not benefit from a settlement boundary, although are now covered by the ring-fence policy. The area surrounding Harwell Campus contains two strategic site allocations which will deliver a total of 1,400 dwellings over the plan period; 850 on the site to the east of Harwell Campus, and 550 on the site to the North West of Harwell Campus (Figure 1 below refers). This will result in the delivery of 1,400 dwellings by 2031, with a further 2000 proposed beyond this date, on sites that are not situated within a designated settlement boundary.

We are concerned that without the clarification that the ring-fence areas benefit from the same level of policy support as the market towns, local services centres and larger villages, in the absence of a defined settlement boundary this could give rise to ambiguities as to whether development is supportable, particularly to the edge of developed areas.

We believe that establishing Harwell Campus with a settlement boundary would result in a more clearly defined settlement, and would ensure that growth within the area is sustainable. The settlement would sensibly and coherently include both strategic site allocations and the Pond Cottages site, as outlined below.

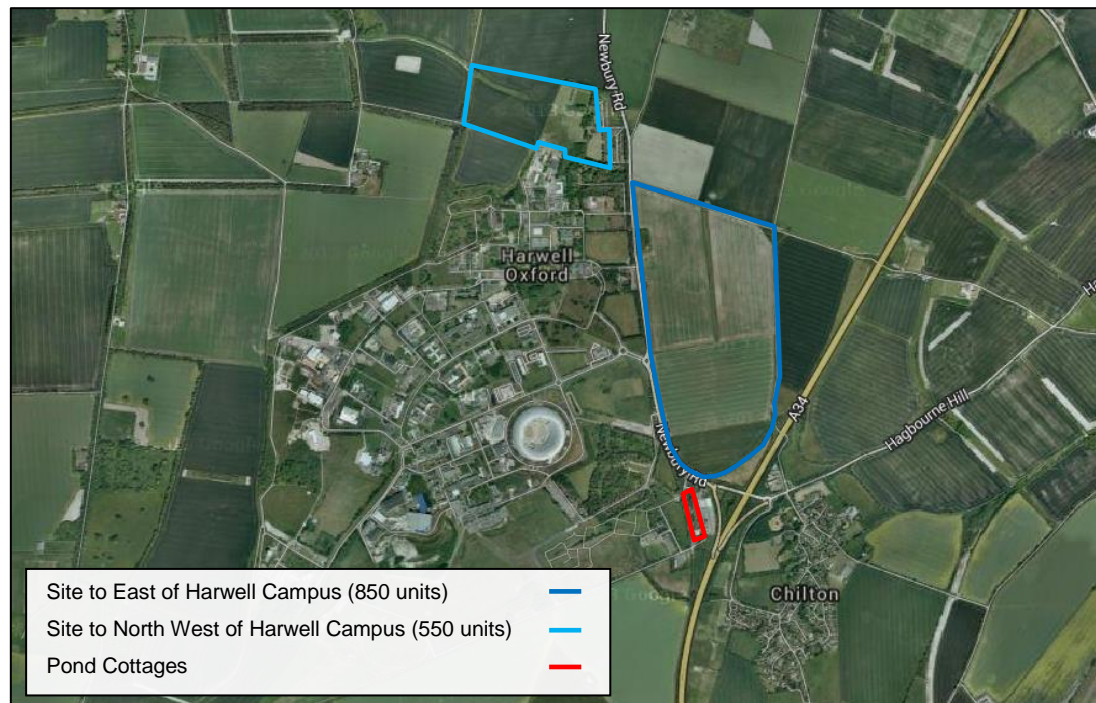


Figure 1: Site Context

Chilton – Small Village

Chilton is allocated through the new Local Plan as a 'smaller village' where development is considered to be less suitable. However, whilst we consider land at Pond Cottages is more

likely to be included in a new settlement boundary for Harwell Oxford Campus, a new settlement boundary for Chilton should also be drawn to inform the new Local Plan 2031.

Harwell Oxford Campus – Larger Village

The Local Plan 2031 protects and enhances the services and facilities provided by Market Towns, Local Service Centres and Larger Villages, ensuring that any new facilities, homes and jobs are focused on these settlements.

As previously mentioned, Core Policy 3 of the Local Plan designates Harwell Campus as a 'Larger Village' within the Settlement Hierarchy. However, this designation is caveated, which states that Harwell Campus has the facilities and services equivalent to a Larger Village.

This caveat may be solely explanatory; however we consider it to introduce an unnecessary level of ambiguity. It could be inferred that Harwell Campus, whilst having the facilities and services equivalent to a Larger Village, is not considered appropriate for the scale of development supportable at other Larger Villages.

Removing the caveat would result in a policy which is clear and practical, ensuring that growth is promoted in all suitable settlements including Harwell Campus.

Reliance on Larger Sites

As stated by Core Policy 4 of the Local Plan, the housing target for the Vale of White Horse District is for at least 20,560 homes to be delivered in the plan period between 2011 and 2031. The housing supply from April 2015 to March 2031 will comprise the following:

- 3,169 known commitments
- 13,960 dwellings delivered through Local Plan Part 1 Allocations
- Up to 1000 Local Plan Part 2 Allocations
- 900 windfalls.

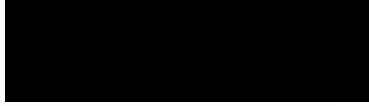
Whilst up to 1,900 homes are identified as contributing to the VoWH housing target through the allocation of smaller development sites comprising less than 200 homes, none of these currently contribute to the 5 year Housing Supply as they are to be identified in Part 2 of the Local Plan which is not expected to be published in draft form until 2015/16. This means that, with the exception of very limited sites located within established settlement boundaries, all new homes to be delivered over the next 5 years are to comprise larger sites of over 200 units.

Whilst we appreciate that most of the new housing in the VoWH delivered over the Plan period will be on larger sites, we consider that to ensure the deliverability of the Plan as per NPPF para. 182, these should be supplemented with smaller sized sites which can address any shortfall.

Whilst limited sites are envisaged to deliver some housing in conjunction with Part 2 of the Local Plan, these will not come forward until post 2016 and thus we strongly recommend that a selection of smaller sites that accord with the NPPF presumption in favour of sustainable development are included in Part 1 of the Local Plan to assist with meeting the new homes required to be delivered over the next 5 years. Pond Cottages would be one such suitable site.

We trust these representations are of interest and we look forward to continuing to work with VoWH to ensure a Local Plan that is able to meet full, objectively assessed housing need through the identification of a variety of sustainable sites, including those smaller sites throughout the district, which should include Pond Cottages.

Yours sincerely



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