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**Via email and post**

Dear Sir/Madam

**LAND AT MILTON HEIGHTS TO THE EAST OF STEVENTON HOUSE HOTEL AND THE A4130**

On behalf of the landowners of the above land, this representation has been prepared in response to the publication version of 'Vale of White Horse Local Plan Part One: Strategic Sites and Policies published in November 2014. We wrote to you previously in October 2014, to include the subject site (our client's land) for residential development within the emerging Strategic Housing Land Availability Assessment (SHLAA). I attach again at Appendix 1 a red line location plan showing our client's land. The land is approximately 5.8 hectares in size and has the potential to deliver circa 200 dwellings.

***Background***

The land subject of this representation is currently used as orchard/fruit growing and an agricultural field. The land to the north and east of the subject land was suggested as a preferred site allocation within the Consultation Draft Vale of White Horse Local Plan 2031 (February 2014). A strip of land along northern boundary of the subject land was also included within the preferred site allocation. The entire land was known as "Milton Parish west of the A34, Milton Heights" and cumulatively expected to deliver up to 1,400 homes in the period up to 2031, with potential for an additional 250 homes beyond 2031. However, in the emerging publication version of Local Plan 2031, the entire land to the north of the subject of this representation land was omitted, and the allocation size has been significantly reduced to 15.81 hectares. The suggested strategic allocation is now expected to deliver approximately 400 homes.

We support the principle of the extension of the settlement boundary for Milton Heights to the west and south, as previously proposed in February 2014. We also request that this settlement boundary as previously proposed is further extended to include the land subject of this representation for mainly two reasons:

- 1) Protection of land to be allocated within the Green Belt and AONB; and
- 2) To meet an immediate housing need within the district



1) **Protection of land to be allocated within the Green Belt and Area of Natural Beauty (AONB)**

At present, twenty-one strategic development sites are proposed for delivering housing land in Appendix 1 of the emerging Local Plan Part One: Strategic Sites and Policies. These sites represent approximately 702.30 hectares of land to be developed over the plan period. Among these twenty-one sites, 6 sites (see below) are proposed within the Green Belt and North Wessex Downs AONB, which are accorded as highest protections within the National Planning Policy Framework (NPPF, March 2012). This equates approximately 23.71% of all strategic land areas, which we consider substantially high in comparison with the overall allocations. For more details, please see the table below.

Nos.	Strategic Sites within the Green Belt and AONB	Key Designations	Area (ha)	No. Dwellings Expected to be Delivered
1	North West of Abingdon-on-Thames	Green Belt	8.13	200
2	North of Abingdon-on-Thames	Green Belt	53.82	800
3	South of Kennington (Radley Parish)	Green Belt + Mineral Consultation Area	11.79	270
4	North West of Radley	Green Belt	12.15	240
12	East of Harwell Campus	The North Wessex Downs AONB	61.74	850
13	North of Harwell Campus	The North Wessex Downs AONB	18.93	550
		<b>Total Area:</b> 166.56 ha (23.71% of 702.30 ha)		2,910

The NPPF retains the strength of Green Belt and AONB designations. Paragraph 79 of the NPPF states that the Government attaches **great importance** (*our emphasis*) to Green Belt. In March 2014, the Government published new web-based Planning Practice Guidance (PPG) to accompany and give further detail about the policies in the NPPF. This guidance makes clear that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify Green Belt development:



*"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."*

On 4<sup>th</sup> October 2014, the Government updated its online Planning Practice Guidance. The aim of this was to reaffirm local authorities' abilities to "safeguard their local area against urban sprawl, and protect the green lungs around towns and cities". The Government stated that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development.

In response to question 'Do housing and economic needs override constraints on the use of land, such as green belt?' the updated PPG states that,

*"The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan."*

*The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as **green belt** (our emphasis), local green space, an **area of outstanding natural beauty** (our emphasis), heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.*

*The Framework makes clear that, once established, green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."*

With regard to sites with AONB, Paragraph 115 of the NPPF states that "**great weight** (our emphasis) should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."

Paragraph 116 of the NPPF advises that "planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest."

From the above, it is clear that the Government emphasises that land within Green Belts and AONBs should be given highest status of protection. More recently, in October 2014, the Government also made it clear that unmet housing need is unlikely to outweigh the harm to the Green Belt or AONB. There are no transitional arrangements to the Government updated PPG. The advice in PPG is therefore relevant to the examination of the Vale of White Horse Local Plan 2031 Part One.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and consequently the most important attribute of Green Belts is their openness and their permanence. The Vale includes part of the Oxford Green Belt within the north of the district.

In December 2014, the 'Oxford Land Availability and Unmet Need Assessment' (known as the Oxford 'SHLAA') was published. The study concluded that there was only enough land in Oxford to accommodate between 32 and 43 per cent of the city's housing need. Oxford City Council leader Bob Price argued that a strategic review of the Oxford Green Belt is urgently needed to allow for a sustainable urban extension. Please see the attached news published on the Oxford City Council's website. It is clear that there is a substantial pressure from both Local Authorities (the Oxford City Council and the Vale of White Horse DC) to review the Oxford Green Belt boundaries to accommodate unmet needs.



Paragraph 80 of the NPPF defines five purposes of the Green Belt. Turning to the five purposes of including land in the Green Belt we comment as follows:

*i) To check the unrestricted sprawl of large built up areas*

As mentioned above, the original designation of the Oxford Green Belt was to prevent the city from extending further into the countryside. The role of the Green Belt within the surrounding districts was to preserve the rural setting of the city. All the suggested strategic sites within the Green Belt are located on the edge of the settlements in the open countryside. Given the scale and size of the Oxford Green Belt, it is likely that the pressure from both local authorities to review the Green Belt boundaries to meet the housing needs would weaken the purpose of the Green Belt in restricting the sprawl of these settlements, in particular Abingdon, Kennington and Radley.

*ii) To prevent neighbouring towns from merging into one another*

The land within the Green Belt should remain open in character. The development of strategic sites would not weaken the role of the Green Belt in checking the separation distance between Oxford, Killington, Radley and Abingdon. There is a high risk that these settlements will absorb into Oxford in the absence of the Green Belt.

*iii) To assist in safeguarding the countryside from encroachment*

As set out below, all the above sites are located within the open countryside and majority of land are currently used for agricultural purposes. The development of these strategic sites on the end of the existing settlements would adversely affect the open countryside both visually and physically. It would also appear encroachments into the wider countryside and therefore does conflict with this objective. The development of these large strategic sites would also reduce the built gap between the settlements and contribute to the vulnerability of the Green Belt to further erosion.

*iv) To protect the setting and special character of historic towns*

The strategic sites are located within the designated landscape character areas (Rolling Farmland; Wooded Estate lands; and Terrace Farmlands) in the 'North Vale Corallian Ridge'. These landscape characters play a key part of the historic setting of Oxford. The strategic sites on the edge of the settlements (Abingdon, Kennington and Radley) would have an adverse cumulative impact on the North Vale Corallian Ridge, rural landscape character of these areas and setting of the surrounding towns, namely Abingdon, Kennington, and Radley.

*v) To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

The pressure for housing developments from both local authorities (Oxford City Council and Vale of White Horse District Council) mean that the protection of this valued part of the Green Belt plays an important role in encouraging the use of previously developed land and land of a lesser environmental quality in the villages and neighbouring Oxford.

From the above, it is clear that the proposed strategic sites within the Local Plan Part One Strategic Sites and Policies would weaken the purpose of the Green Belt, and conflict with Paragraph 80 of the NPPF.

Paragraph 12.3.12 of Sustainability Assessment of the Vale of White Horse Local Plan 2031 Part 1 states that in identifying the preferred sites, the Council first considered those sites which were not located within the North Wessex Downs AONB or the Oxford Green Belt. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt. We do not agree with this assessment, as sites in sustainable locations are available for development.

As mentioned above, the land subject of representation, including the land to the north and east of the subject land, as previously suggested, is located outside the sensitive areas i.e. AONB and Green Belt. The land has no designations within the adopted Local Plan and is available, suitable and appropriate for housing development. Furthermore, this land is located within the 'Science Vale Area' where around 15,850 or almost 70% of the 23,000 new jobs forecast for the district to 2031 are likely to be located, and supports the Council's ring-fence approach in emerging Core Policy 5. In comparison between our client's land and all four allocations with the Green Belt, it should be noted that our client's land is located in highly sustainable location as all four allocations within Green Belt are located outside the 'Science Vale Area'.

In our view, the strategic allocations within the Green Belt and AONB (as set out in table above) must be protected. Allocating the land subject of this representation and surrounding land at Milton Heights for housing, as previously suggested, can protect all strategic site allocations within the Green Belt.

2) To meet an immediate housing need within the district

For a number of reasons, the District has not achieved its housing target in the past. The ownership, availability, affordability, sustainability and financial viability were among the other key issues which prevented delivering housing sites on time in the past, particularly strategic sites. For instance, a strategic site, Grove Airfield (expected 2,250 houses), allocated in the saved Local Plan 2011 (adopted 2006), but has only secured planning permission subject to legal agreement in September 2014. However, in terms of the timescale, there is uncertainty that when these houses will be built and occupied.

The Council has also claimed that 3,169 houses (15.41% of the total 20,560 houses requirements between 2011 and 2031) are committed. In our view, it is unlikely that all committed developments will be built in the plan period. Furthermore, the Council relies on 1900 houses (9.24% of the total 20,560 houses) being achieved through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management process. In August 2013, the VWHDC published its annual report on housing delivery following the collation and analysis of housing completions. The report states that the Council achieved a supply of 3,470 homes deliverable within the next five years. However, in context of recent housing delivery across the district it represents 4.4 years of housing land supply inclusive of the 20% housing supply buffer. It clearly demonstrates that the VWHDC does not represent five years worth of housing supply against their housing requirement. Considering past housing delivery issues and the present housing backlog; we do not accept that around 10% of the overall land requirement can be met by Neighbourhood Development Plan or windfall sites.

Submitting this representation, we again notify that there is an immediate need for additional houses within the district. The land subject of this representation is readily available, suitable, appropriate and sustainable for residential development.



### ***Site Sustainability***

The land has no designations on the adopted or emerging Vale of White Horse Council Local Plan Proposals Map. At present, land is surrounded by sporadic residential properties to the east, west and south. The nearest settlements are Milton Heights, about 800 metres to the northeast; Steventon, approximately 1.5 kilometres to the north; Milton, some 2.5 kilometres to the northeast; Harwell, approximately 2.5 kilometres to the southeast; and East Hendred, approximately 2.6 kilometres to the southwest. Steventon, Milton, Harwell and East Hendred settlements have a good range of services, the majority of which are located along the respective High Streets. These services include post offices, varieties of shops and supermarkets, garages and fuel stations, public houses, churches, village halls, GP surgeries, primary and secondary schools, and recreation grounds. In wider context, Didcot is located approximately 6.0 kilometres to the east of the promotion land.

The land also benefits from public transport facilities, as there are two bus stops located along Abingdon Road (A4130). The bus stops to the north and south are located approximately 850 and 500 metres from the promotion land respectively. There are regular, frequent services to Oxford, Grove, Wantage, Didcot and various nearby settlements. Didcot Railway Station is located within the town centre, which is approximately 6.0 kilometres to the east of the promotion land. It provides services to London, Cardiff, Swindon, Bristol, Newport and Oxford and various other destinations in South East and Wales.

The site can provide a safe, easy and convenient access via Abingdon Road. In terms of road access, this is the most suitable site for development with an easy access to local settlements including Didcot without causing any material harm to the highway safety. This demonstrates that a range of shops and services can be accessed in a sustainable way using the existing road network and public transport facilities. Furthermore, the development of the strategic site, Valley Park and Milton Parishes east of the A34 adjoining Didcot Town (180.73 ha), would provide a range of shops and services on the doorstep. If the land is allocated, then there are also opportunities to create self-sustained community on the land west of the A34 by providing a range of shops, services and the inclusion of a play park, school and affordable housing, which also assist improving sustainability of the nearby settlements including Steventon, Milton, Harwell, East Hendred, and employment location Milton Park.

### ***Highway***

As mentioned above, the land west of the A34 was considered as a preferred strategic site within the Consultation Draft Vale of White Horse Local Plan 2031 (February 2014). From Oxfordshire County Council's letter, dated 17th April 2014, it appears that provision of houses in this location are reduced (from 1,400 to 400 houses) mainly due to the County Council's concerns about being able to provide satisfactory direct access to a development of this size and the wider impact on Milton Interchange. Significant funding has been put in place through the Oxfordshire and Oxford City Deal for improvements to the A34 Milton Interchange. It is not proven that sufficient evidence has been produced to demonstrate that this is a significant issue in highways terms that warrants a reduction in the allocation at Milton Heights.

### ***Conclusions***

With regard to identifying appropriate land to meet housing needs, the emerging Local Plan proposes removing highly sensitive land from the Green Belt and AONB to allocate it for residential development purposes to meet an unmet need for housing. We question the Council's approach of proposing Green Belt Boundary amendments (which once established, should only be altered in exceptional circumstances; Paragraph 83 of the NPPF) and strategic site allocations on highly sensitive land, which is Green Belt and AONB to achieve housing requirements. In line with the NPPF and PPG, we do not consider that unmet housing need in the Vale of White Horse District in this instance outweighs the harm to the Green Belt and AONB and as such does not constitute 'Very Special Circumstances' for removing land from the Green Belt and AONB and allocating it for development given that these are sustainable



alternative sites outside of the Green Belt and AONB. We consider that the Council's approach is inconsistent with advice in the NPPF and PPG.

Paragraph 180 of the NPPF advises that 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. We consider that the emerging Local Plan is not positively prepared as it does not sufficiently address the unmet need for housing arising from Oxford City Council and the cumulative impact of their intention to review the Green Belt boundaries. Given that suitable sites are available in less sensitive areas within sustainable locations and there are no 'Very Special Circumstances' that exist, allocating the sites within the Green Belt and AONB conflict with the NPPF and PPG. Furthermore, the Local Plan does not sufficiently justify with appropriate evidence a significant reduction of the preferred allocation site from 1,400 to 400 homes. For the reasons above, we consider that the emerging Local Plan is not 'sound'.

Instead of proposing such Green Belt and AONB Boundary alterations, we consider that the Council should review the land subject of this representation and surrounding land as previously considered. We also acknowledge that there is a desire, and demand, for existing residents to remain in Milton Heights and new residents are attracted to the area where the Council expected growth (the Science Vale area). Therefore, there is an immediate need for housing to provide deliverable housing sites within the Science Vale area where there is known demand. The land subject to this representation is an ideal candidate in this respect.

Our clients control the land subject of this representation, which is considered suitable, available, achievable and appropriate for housing development. The site would assist meeting an immediate need for providing local housing as well as meeting the district wide need. Allocating this land would assist releasing pressure on the Green Belt and AONB sites, which accorded highest designation. It provides for a sustainable approach to the planning of the settlement. Therefore, the land should be allocated for housing in the emerging Local Plan 2031.

Core Policy 4 (South East Vale Sub-Area) of the publication version of the Vale of White Horse Local Plan Part One: Strategic Sites and Policies (November 2014) is currently 'unsound' and should be amended to include the following allocation:

**Milton Parish west of the A34: Milton Heights: 1,600 (with potential for a further 250 after 2031)**

We trust that the above and attached will be given due consideration in the Local Plan Examination. If you have any queries or wish to clarify matters at this stage, please do not hesitate to contact me.



**BArch, MA, MSc, MRTPI**

cc: R Herd Esq.

Encls. Appendix 1      Location Plan – outline the client's land in red;

Appendix 2      News from Oxford City Council, posted on 5 December 2014