

JPPC ref: hv/5802

Planning Policy
Vale of White Horse District Council
The Abbey House
ABINGDON
OX14 3JN

11 December 2014

Via email to:
planning.policy@whitehorsedc.gov.uk

Dear Sirs

**Local Plan 2031 Part 1: Strategic Sites and Policies
Consultation Publication Version November 2014
Comments regarding land in Milton Parish west of the A34,
Milton Heights-**

- 1 In relation to the above proposed allocation I write on behalf of landowners Mr C, Mrs A, Mr S & Mrs G Hartwright. They have full control over the land they own between them. In this submission we refer to them as the Hartwrights. They may be considered a unified party for these purposes. They own the great majority of the land that is subject of the proposed allocation known as land in Milton Parish west of the A34, Milton Heights.
- 2 This submission has two elements to it. Firstly general support and secondly an objection based upon a failure to consider wider housing needs. A suggested solution to this is included to make the plan sound.

General Support for proposal

- 3 We agree with the Council that there is a need to identify a number of larger development sites in order to ensure that sufficient housing is built to meet the housing needs of the District as identified in the latest available evidence which is the SHMA (February 2014). This would appear to meet the requirement in the NPPF (para 14) for Local Plans to meet objectively assessed needs.
- 4 Any allocation will need to be located in a sustainable location and have good sustainable development credentials.

continued....

- 5 Given the very large number of homes required before 2031, the Council has assessed the ability for development to be provided within existing settlements/brownfield sites and it is clear that the number of homes identified will need Greenfield sites to come forward. Also given the very large number of homes large but separated strategic allocations are required to come forward to ensure flexibility in the plan to ultimately ensure delivery, which is the real aim of future planning.
- 6 The Spatial vision for the District (page 29 of the Consultation paper) is supported as the areas identified are the most sustainable parts of the district where development of the scale envisaged can be assimilated and realistically provided. In particular the ring fencing to Science Vale is supported as this is already sustainable but could still be improved. Development here will improve the area. This vision meets the NPPF paragraph 154 need to be aspirational but realistic.
- 7 The Spatial Strategy sets out how the Vision will be shaped. It is supported.
- 8 The overall objective of the plan is to provide new jobs and new homes and we do not seek to challenge the numbers set out for the Vale. Logically and for sound sustainability reasons- including the need to reduce travel by car- jobs and homes ought to happen near to each other. The overall objective therefore is to focus development in what is becoming known as Science Vale. Milton Heights is close to the geographic centre of this area and therefore in our view is suitable for further expansion, and expansion of the scale envisaged. In particular the area is not one of those which is identified in the NPPF as being one where development should be either limited or restrained, such as Green Belt or AONB. Indeed Milton Heights does not have any landscape or other special nationally recognised landscape designation. There are no particular heritage features such as listed buildings or Conservation Areas which might be affected by large scale development.
- 9 Any allocation will clearly need to fit in with the overall Plan, but in this case we seek only to comment on the suitability of the proposed allocation of land in Core Policy 15, for Site Name 'Milton Heights (Smaller Village)-400 dwellings'. We support the policy but these comments should not be taken as undermining another suggestion (see further down this letter) that there should be 1,400 homes on this site.
- 10 We consider that the Milton Heights site does fit in with the overall objective of focussed development in Science Vale; an area with many established jobs and where new jobs could quickly be grown to complement what exists at present to drive a sustainable local community.
- 11 In our view the site would deliver sustainable development; as required by the NPPF. A balancing exercise has to be carried out, but the benefits of developing this particular site would clearly outweigh any possible disadvantages, given the pressing need for additional housing to meet assessed needs.
- 12 We consider that development as envisaged for Milton Heights here would meet the 11 of the 12 core planning objectives of the NPPF because

- allocation would ensure that the development would be genuinely plan-led, empowering local people to shape their surroundings, with a positive vision for the future of the area.
 - the proposal would clearly involve a creative exercise in finding ways to enhance and improve the places in which people live their lives;
 - housing led development with a new 'garden village' would help to provide choice in the housing market and therefore could help attract people from a wide area which would help to proactively drive and support sustainable economic
 - a masterplan led layout and design would secure high quality design and a good standard of amenity for all future occupants;
 - it would help to protect the Green Belt by offering a suitable location for new housing
 - wholesale new development would help to support the transition to a low carbon future in a changing climate, by being able to be wholly laid out to be adaptable and take full account of flood risk, and encourage the use of renewable resources (for example, by the development of on-site renewable energy);
 - contribute to conserving and enhancing the natural environment and reducing pollution. This allocation would be of that is of lesser environmental value, due to the absence of designation as SSSI, SPA, Conservation Area, Conservation Target Area or wildlife area and thus would be consistent with policies in the NPPF;
 - mixed use development would be promoted with services and facilities included within the schemes, and potential, recognition that some open land around the edges of the site could perform many functions (such as for wildlife, recreation, flood risk, mitigation, carbon storage, or food production);
 - providing development here well away from any heritage assets would reduce pressure on other sites that are historically sensitive
 - the site is well placed to make the full use of existing and future public transport, walking and cycling, and would be located where it is sustainable and can be made even more so; and
 - health, social and cultural wellbeing for all local needs can be delivered,
- 13 The only core principle that this allocation could not deliver on would be any encouragement to reusing land that has been previously developed (brownfield land), but it is clear in an area like VOWHDC that there is not sufficient brownfield land to provide for the level of development required to meet housing and business needs, such that Greenfield land will be required.

Site specific benefits

- 14 The following benefits are likely to arise from this specific proposed allocation and the residential led development proposed (other infrastructure and services would clearly be necessary too).

Access

- 15 The Site Template for Milton Heights identifies that local junctions may need major upgrade, but we do not consider this likely. Should we be wrong about that the Hartwrights as land owner are willing to make the land available for development and because they own adjoining land adjacent to the junction between Milton Hill and the A4130, it is highly likely that any necessary upgrading to the main road network can be facilitated and/or carried out, land they own near to junctions is shown **attached**.

- 16 Glanville¹ (an experienced local firm of Highway Consultants) has been instructed to review the vehicular access into the proposed site along the connection indicated in the Plan and it is clear from their work which is attached (Glanville Appendix C) that the proposed access would be safe and have appropriate visibility. Any works are considered by them to be straightforward.
 - 17 This would mean that good access to the main road system could be achieved ensuring that any development would not have an unduly harmful impact on the existing traffic network and allow free flow of traffic. Also the site would be well connected with the important centres of employment at Milton Park and Harwell Campus Oxford, and more locally the Esso research area on Milton Hill.
 - 18 It would appear from the Glanville report (Sections 2 and 6 in particular) that appropriate and safe access (with suitable visibility and geometry) can be provided to/from Milton Hill and/or the A4130 without needing the major upgrade previously assumed. Only a minor sight line is required to be provided and fortuitously this is over land owned by the Hartwrights. In this case the large scale ownership of a single owner avoids the need for significant land assembly and will ensure deliverability.
 - 19 The ability for the local road network to assimilate the development has been established by Glanville's report which is **attached** to this submission confirms that access is achievable. This will ensure that early delivery of the development is possible and that it can occur within the life of the plan thus ensuring its deliverability, insofar as it relates to this site.
 - 20 There is no existing network of footpaths actually on the site but the development area would be such that interesting new routes and also connections between Harwell and Milton Heights (existing settlement and as proposed to be extended) could be created. An indication is given **attached**. This would enhance the local environment for existing residents.
 - 21 Only pedestrian or cycle access would be needed between the new development and the existing homes at Milton Heights, which would protect amenity for existing residents there. This is achievable.
 - 22 Public open space and recreational facilities can be provided on site or in close proximity to it on suitable land nearby within the existing land owner's control.
- Landscape
- 23 Although a detailed landscape and visual study will be required in due course, this site has the potential to occupy a relatively well screened area which is not close to or unduly visible from the North Wessex Downs AONB. The existing built up area of Milton Heights can be integrated into a new development as the land available directly borders that area.
 - 24 There is suitable scope for use of existing features and the planting of appropriate new woodland and/or landscape features edges to all boundaries and to retain the existing field pattern within the development.

¹ See separate report attached to this letter from Glanville

- 25 The Landscape Analysis carried out by Terrafirma Consultancy Ltd is considered appropriate in this instance. We agree with its conclusions² that the site has a high landscape capacity for development given the medium/low landscape sensitivity and low landscape value.

Heritage

- 26 Although a large scale proposal it is evident that there are no nearby listed building or Conservation Area heritage assets which might limit development potential (see **attached** map extract).

Community

- 27 Milton Heights may be considered too small and to have insufficient services to have a particularly strong existing community core. The level of development envisaged will bring a number of other services such as shops, community centres and a primary school, that would strengthen community facility provision at Milton Heights and benefit existing residents.

- 28 Although we identify that connections can be provided to Harwell it will be important for Milton Heights not to overwhelm Harwell and its historic identity. Wide open areas which would be maintained between this suggested development site and the historic village of Harwell areas meaning Harwell would remain an identifiably separate village if this site were to be allocated (either as proposed or as shown in our alternative- see below).

Flooding

- 29 It would appear that local topography would protect the site from overland storm type flooding and it is clear that the site is at a very low level of flood risk- it lies some distance from areas of high flood risk (see map **attached** at end). The site has no known drainage problems and new development would not be likely to cause drainage problems on site or to nearby sites. There is sufficient land ownership to provide any necessary sustainable urban drainage systems. The site has a natural valley to which water runs at present. This drainage corridor can be protected and enhanced for drainage and ecological interests.

Ecology

- 30 There is no known feature of ecological or other such important environmental importance that would preclude development of the site. A phase 1 ecological survey has been commissioned³ (see **attached**) and carried out in this regard which reveals that there is no biodiversity interest on the site which would preclude the development from taking place. Potential ecology enhancements can be included given the poor existing biodiversity interest.

Sustainability and location

- 31 The site is very well located to take advantage of the Local Plan's vision of sustainable economic development that is identified by Science Vale and significant employment potential of Harwell Campus and Milton Park- in addition to Didcot and the Technology centre at Milton Hill . It is at the heart of this area. People living here would not need to own a car to access all vital day to day services, including employment, schools and shops. The site already is well positioned to existing jobs and must be considered very well positioned to be considered sustainable in transport terms in relation to the overall strategy.

² where it treated the site as Site 40B – page 309 onwards

³ See attached report by Ecoconsult

- 32 If development cannot take place in the scale envisaged at other locations, such as in the Green Belt for instance, then this site will be even more important to meeting housing needs. The site could come forward within the first five years of a new plan.

Other advantages

- 33 Planning for substantial development here means that when the Plan is reviewed and assessment is given to Oxford's housing needs in particular this site would be suitable for further expansion into a larger new settlement.
- 34 We have confirmed via a utilities search that there is nothing on the site (or underground) that would preclude this development from being able to take place. It has no show-stoppers.

Summary of support

- 35 In nearly every respect the site would comply with the NPPF advice that development be provided in areas that are not subject to specific NPPF policies indicating that development should be restricted.
- 36 Thus in terms of the three prongs of sustainable development, allocation of this site would be appropriate in economic, environmental and social terms.
- 37 However this support should also be read in the context of the objection identified below- which suggests that 1,400 homes could be accommodated here.

Notes- suggestions for change

- 38 The proposed allocation sets a hard and obvious linear edge that may not provide for an attractive development that might beneficially have more sinuous edges. It also proposes the site area to go close to the A34 whereas Core Policies 17, 18 and 34 'A34 Strategy' notes that this route needs to be safeguarded. We would suggest that the development area be not as rigid as proposed or made wider so to ensure a high quality development rather than one fitted to an arbitrary site area. At present the site is shown as 15.8ha, which if 15% is required to be open space would leave 13.4ha developable. At a density of 30dph this would create 402 dwellings. However this does not include provision for community infrastructure, school expansion or roads which are not included in dph calculations and reduce the developable area. We consider that the allocated site should be given a softer or more flexible edge to ensure compliance with all policies and that a truly high quality scheme can result.
- 39 We have suggested a better site outline **attached** (7).

Could do better

- 40 In addition to that we also suggest that this plan should go further with respect to Milton Heights. In the previous consultation version of the emerging Local Plan VOWHDC identified a proposed allocation of 1,400 homes for Milton Heights with the aim being to enable creation of a new garden village in this area. This proposed allocation would we understand have proceeded but for a single objection from Oxfordshire County Council Highways who suggested a

rather arbitrary limit of 400 dwellings due to possible concerns over capacity through the existing Milton interchange with the A34.

- 41 However that objection seems to have stemmed from a lack of appreciation of the opportunities offered from the extensive land owned by the Hartwrights, including the possibility of bridging the A34 at a naturally convenient point.
- 42 Indeed there is an existing footbridge and farm access bridge over the A34 see image below, which shows that the landform on the east and west sides of the A34 is suitable for running a bridge across (because the A34 sits in a cutting here) without needing extensive raised run-ups to the bridge. This is useful as it means that cost of infrastructure like a bridge can be relatively inexpensive and certainly affordable.



Image 1. of existing bridge over A34 close to Harwell/Milton Heights

- 43 Such a solution needs some careful thought but would add to the network of routes and improve choice for users. It could therefore remove some traffic from the Milton Interchange. Although more work needs to be done, and is to be done, there is clear scope to overcome the arbitrary limit of house numbers in the Plan as proposed.
- 44 Due to this we feel that we must object to the proposed allocation as not going far enough. There is developable land available which can be delivered and could be considered as an allocation or as a contingency.
- 45 The Hartwrights partner- BrightWell Solutions- has a unique business model which could deliver large numbers of houses in quick time, and which would allow for provision of nearly all necessary infrastructure prior to substantial numbers of houses- this is set out in their statement which is **attached**⁴. Their infrastructure delivery model only works with at least 700 homes being allocated. This model optimises at about 1,400 homes.

⁴ See statement from BrightWell Solutions December 2014 attached

- 46 In planning for only 400 homes there is a risk that Milton Heights is developed in a way that fails to optimise its potential for more homes. The landowner should be given a clear steer to plan for more homes given that Didcot is expanding in all directions and is reaching critical boundaries in relation to the A34 and other designations such as the River Thames flood area and AONB. Good planning now could allow provision of infrastructure to remove future barriers to development.

Objection to policy-

Reference: Core Policy 15 Local Plan Part 1 Strategic Sites and Policies: Spatial Strategy for South East Vale Sub-Area

Milton Heights Milton parish Land to west of A34

And

Reference: CP2 co-operation on unmet housing need Local Plan Part 1 Strategic Sites and Policies

- 47 The NPPF requires that the objectively assessed housing needs of the area should be met, with sufficient flexibility to adapt to change (NPPF para 14). Those needs should relate to Oxfordshire as a whole but CP2 seeks to delay consideration of Oxford City's to a later stage but it seems clear that Oxford (following its own SHLAA of November 2014) will not be able to accommodate its own unmet need. Whilst we agree that this will need testing, provision should be made for increasing supply in the Vale and providing for contingency given the strong likelihood of Oxford not being able to meet its own needs within its fixed boundary. This failure to plan effectively means that the plan may be considered unsound. This can be corrected however by the means we identify below under proposed solution.
- 48 Issues with other sites may also occur meaning it would be sensible to plan ahead and provide contingency. BrightWell can plan to provide nearly all infrastructure for a sustainable settlement as set out in their letter, given the security of allocation. At present their model is not able to be relocated to other large sites in VOWHDC given that 'traditional' developers have options on those. Milton Heights presents a realistic site for 1,400 homes and to be delivered quickly under their model.
- 49 This larger scale of development would be likely to provide a better and more wholesome comprehensive scheme which given the scales of economies present. In particular the affordable housing can come at an early stage.
- 50 It is the increased scale of development that would allow the scheme to become the exemplar development originally envisaged by VOWHDC (see February 2014 draft allocation as **attached** (9)). The passivhaus/CSH level 6 identified by BrightWell cannot be realistically achieved under smaller numbers. We do not believe that any other schemes would achieve such high levels of sustainability. Core Policy 40 does not seek to set a standard for building performance but instead to leave this to Building Regulations. The vision here would be to significantly exceed the Regulations and thus ensure provision of an exemplar scheme across the board.
- 51 The geographic area of the allocation would beneficially change to keep it all in one area but better allow for connections to roads, including the suggested

bridge over the A34 and to provide a single identifiable new settlement- albeit one still vitally connected into the existing settlement of Milton Heights.

- 52 There is no existing network of footpaths actually on the site (see map at end of letter), but the development area would be such that interesting new routes and also connections between Harwell and Milton Heights (existing settlement and as proposed to be extended could be created). An indication is given **attached** at 10. This would enhance the local environment for existing residents.
- 53 Only pedestrian or cycle access would be needed between the new development and the existing homes at Milton Heights, which would protect amenity for existing residents there.
- 54 In addition infrastructure provision in a new 'garden village' could also include cycle ways which would enhance access from homes to services without users needing to use main roads. Non-car access can be can be prioritised from the new homes to the new village centre, the countryside, and to existing and potential bus stops in addition to links to Harwell's existing services and employment sites.
- 55 Public open space and recreational facilities can be provided on site or in close proximity to it on suitable land nearby within the land owner's control.
- 56 Milton Heights may be considered too small to have an excellent level of sufficient services to have a strong community core. The level of development envisaged by increasing allocation to 1,400 will bring a number of other services such as shops, community centres and a primary school, that would very much strengthen community facility provision at Milton Heights and benefit all existing residents.
- 57 Although we identify that connections can be provided to Harwell it will be important for this potential new garden village not to overwhelm Harwell and its historic identity. The greenfield open areas which would be maintained between this suggested development site and the historic village of Harwell areas mean Harwell would remain an identifiably separate village if this site were to be allocated at 1,400 dwellings.

Other advantages

- 58 Planning a new settlement from the start means that there exists the opportunity for wholesale development fit for the 21st century with all new services being provided including current and future communications technology. Inbuilt adaptability can be provided to ensure ease of modernisation in decades to come. A site like this would not have to be fitted to out of date existing urban infrastructure which is thus a big advantage.

Proposed solution to overcome highlighted objection

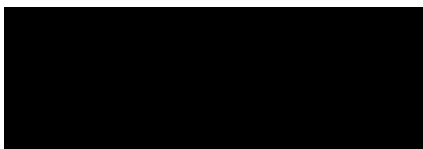
- 59 It is recommended that the proposed 400 allocation be increased to 1,400 as originally envisaged. We set out the changes to the Policy CP15 below for clarity

Settlement/ Parish	Settlement Type	Site Name	Number of Dwellings
Wantage	Market Town	Crab Hill (North East Wantage and South East Grove)	1,500
Grove	Local Service Centre	Grove Airfield Monks Farm (North Grove)	2,500 750
Harwell and Milton Parishes east of the A34 adjoining Didcot Town	Larger Village	Valley Park	2,550
		North-West of Valley Park	800
Harwell Campus		East of Harwell Campus	850
		North-West of Harwell Campus	550
Harwell		West of Harwell	200
Milton Parish west of the A34		Milton Heights (Smaller village)	400 1,400
Sutton Courtenay		East of Sutton Courtenay	220
			Sub total 10,320 11, 320

- 60 The site template at page 23 of the Appendix 1 would also need to be changed to reflect this change. The map to accompany it would be as included at **Attachment 11** to this letter.

If you have any questions about this submission please do not hesitate to contact me.

Yours faithfully



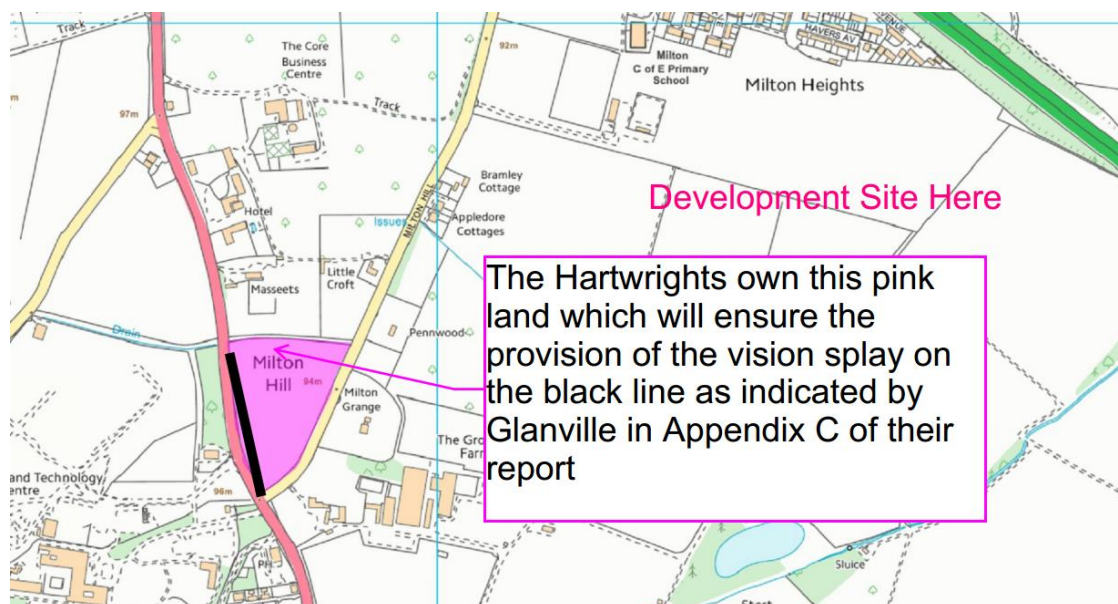
Henry Venners BSc(Hons) MA MRTPI
Associate
Email: henry.venners@jppc.co.uk

Enclosed: VOWHDC response form

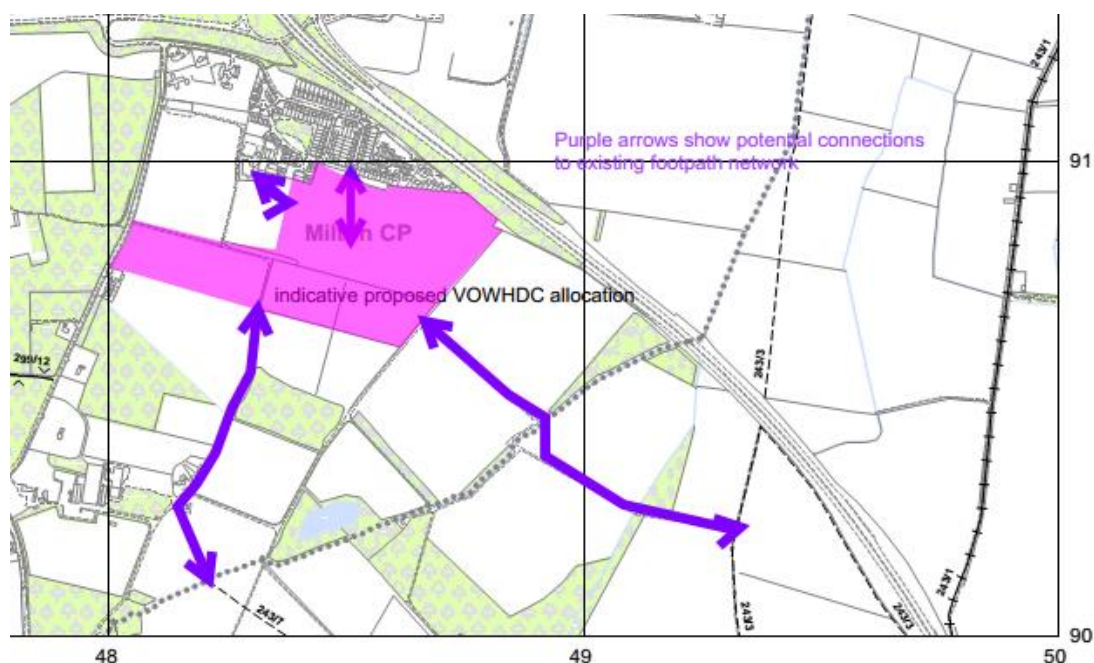
List of items referred to in the text above and appearing overleaf or attached

1. land adjoining Milton Hill potentially available for road improvements in the Hartwrights' ownership
2. Glanville Highways report (attached separately)
3. local footpaths and potential connections (not including new paths within the allocation area) for 400 homes
4. heritage map
5. local high risk flood areas
6. Ecoconsult Ecology report (attached separately) and TVERC report
7. An alternative site area layout for 400 homes
8. Statement from BrightWell Solutions (attached separately) with letter from Glanville
9. February 2014 VOWHLP2031 vision for Milton Heights. (attached separately)
10. local footpaths and potential connections (not including new paths within the potential allocation area) for 1,400 homes (attached separately)
11. An alternative site area for 1,400 homes (attached separately) (as 10 red line only)

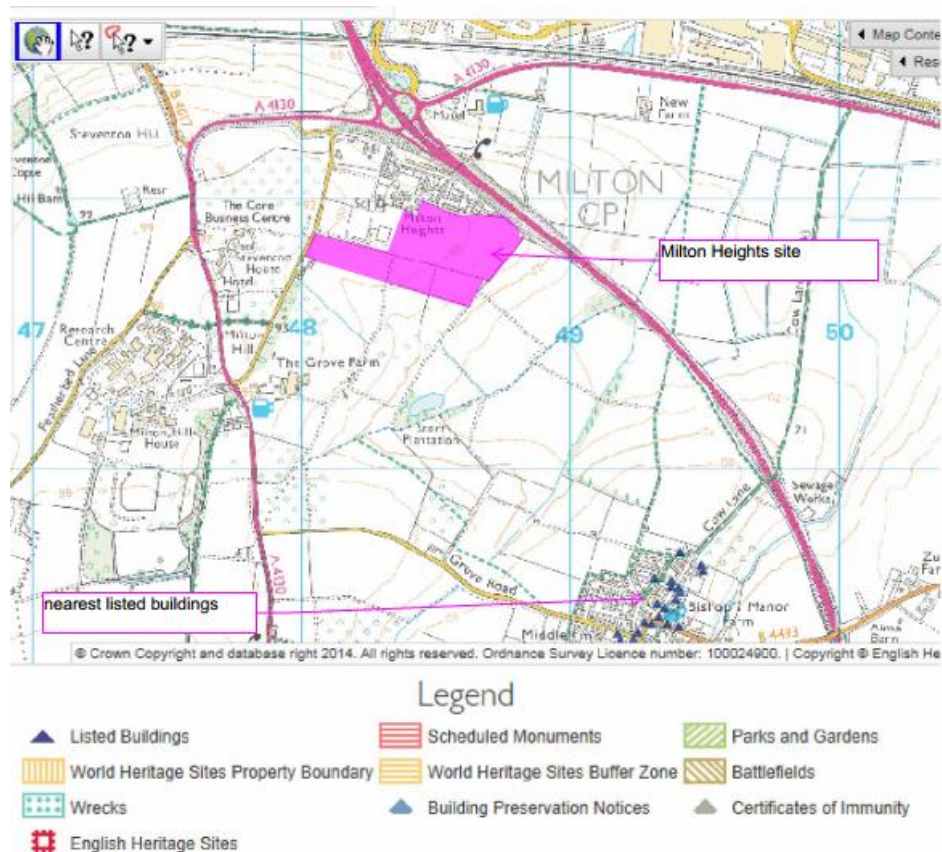
1. Highlighted area of land also in the landowner's control which may be available should road improvements be necessary at the junction of Grove Road with the A1430.



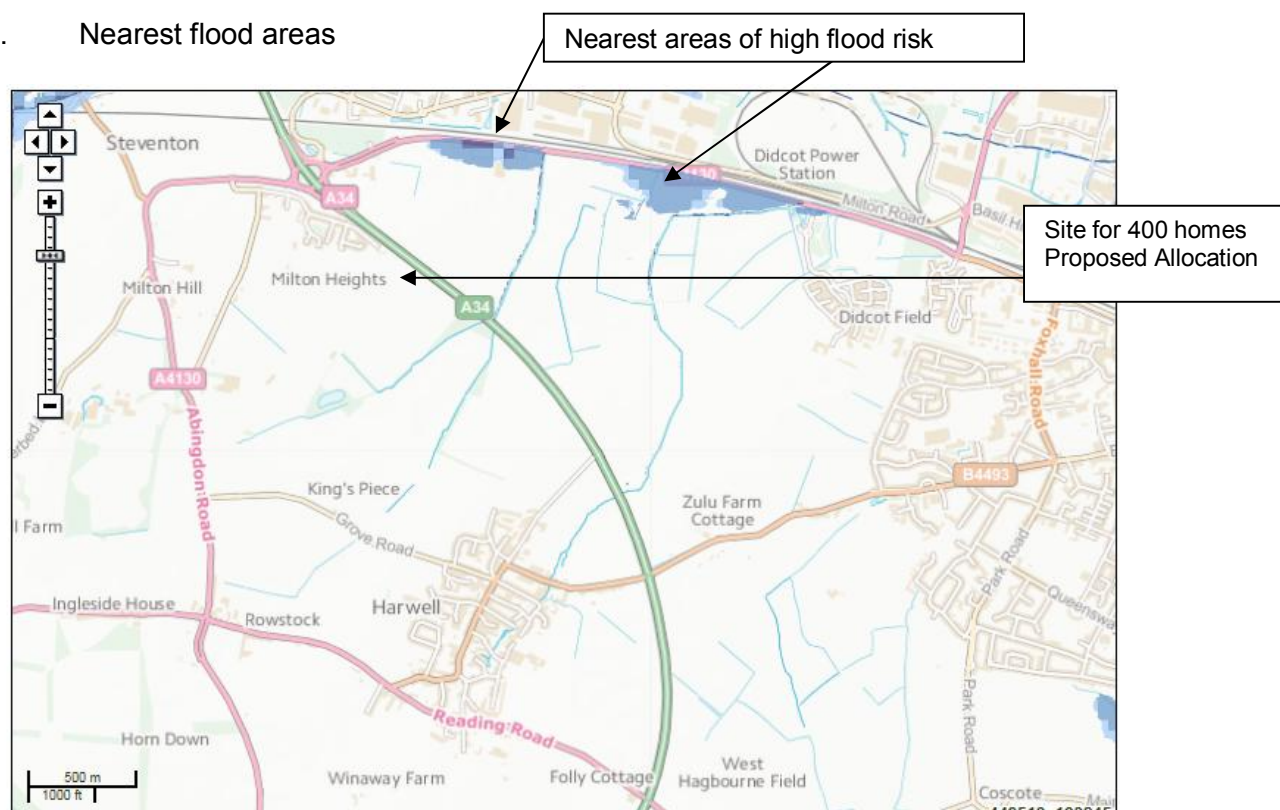
2. see separate report attached by Glanville
3. Map extract showing paths that can easily be connected into from development of this site 243/7 and 243/2.



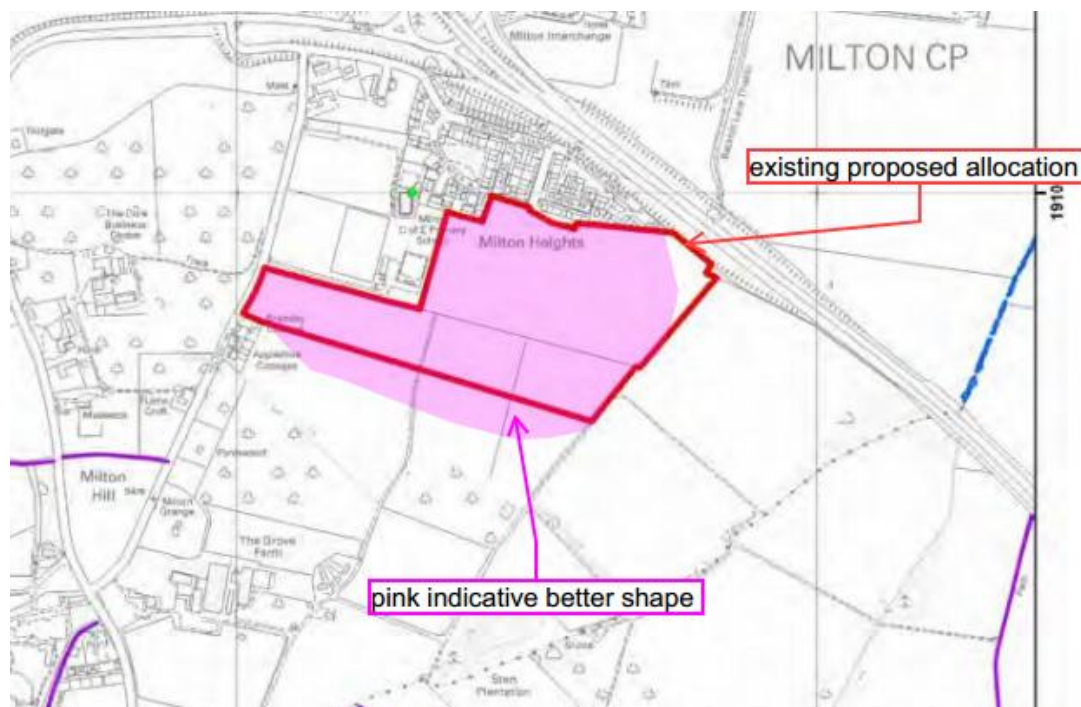
4. Local Places/sites of heritage interest (source English Heritage)



5. Nearest flood areas



6. Ecology by Ecoconsult see separate report attached
7. suggested better site allocation site outline for 400 homes



8. Statement from BrightWell Solutions with letter from Glanville (attached)
9. February 2014 VOWHLP2031 vision for Milton Heights. (attached)
10. local footpaths and potential connections (not including new paths within the allocation area) for 1,400 homes (attached)
11. An alternative site area for 1,400 homes (attached) (as 10 red line only)