

VALE OF WHITE HORSE
LOCAL PLAN 2031 - PART 1
PRE-SUBMISSION CONSULTATION DECEMBER 2014

Representations
on behalf of
Mr and Mrs Comley

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SUMMARY

- i. These representations are submitted in response to the Vale of White Horse Local Plan 2031 Part 1 – Pre-submission Consultation, December 2014 (LPP1). They are made on behalf of Mr and Mrs Comley.
- ii. Mr and Mrs Comley have land under their control off Canal Way, East Challow. The land extends to 3.97ha and is identified on the plan attached as **Appendix 1** to these representations. The land is available and suitable for residential development. It has been considered in the Council's Strategic Housing Land Availability Assessment (SHLAA) as site reference EACH08. Part of the site is considered suitable in the SHLAA to deliver around 30 dwellings. Mr and Mrs Comley confirm that the site is available for development.
- iii. East Challow is a Larger Village and a sustainable location for further development. There are no overriding constraints to the development of Land off Canal Way and it is a deliverable housing site.
- iv. Given the extent of the land available off Canal Way it is acknowledged that the site is not strategic in scale and so will be allocated through a Neighbourhood Plan or the Local Plan Part 2 (LPP2). These plans will, however, need to be in conformity with LPP1 which is, therefore, of significant interest to Mr and Mrs Comley.
- v. The following sections of this report set out representations and objections on behalf of Mr and Mrs Comley which may be summarised as:
 - The plan fails to address Oxford's unmet housing needs the extent of which is significant. Core Policies 2 and 4 are not considered sound. Consideration of Oxford's unmet housing needs is required prior to the adoption of LPP1.
 - The plan erroneously identifies East Challow within the Western Vale Sub Area, separating the village from its service centre Wantage and the Science Vale area. This is unjustified and Core Policies 3, 15 and 20 require amendment to include East Challow in the South East Vale Sub Area and Science Vale.
 - The proposed housing supply ring fence (Core Policy 5) is too tightly drawn and risks under delivery against the housing and economic growth targets. The ring fence would more appropriately be applied to the South East Vale Sub Area, including East Challow.

1.0 CORE POLICY 2 CO-OPERATION ON UNMET HOUSING NEED FOR OXFORDSHIRE

- 1.1 Mr and Mrs Comley support the intentions of Core Policy 2 to co-operate with adjoining authorities to address Oxford's unmet housing needs but object on the basis this co-operation has not been undertaken to inform the Local Plan Part 1 (LPP1). As a consequence Mr and Mrs Comley consider that Core Policy 2 and LPP1 are unsound as they are not positively prepared, not justified, not effective and inconsistent with national planning policy.
- 1.2 As is highlighted at paragraph 1.18 of LPP1, co-operative working is being managed through the Oxfordshire Growth Board. Mr and Mrs Comley support the intentions of the board and agreement to engage constructively including with regard the preparation of development plan documents.
- 1.3 Paragraph 1.21 indicates that this process has started and is expected to take at least 12-18 months. This reflects the Strategic Work Programme presented to the Oxfordshire Growth Board on 20th November 2014 and where the board resolved to endorse the principles of the strategic work programme.
- 1.4 These principles include:
- A recognition that joint work on future spatial options, transport infrastructure and green belt will be required to feed into Local Plans;
 - Recognition that the City cannot fully meet its housing needs and there is a need to agree on the level of unmet need; and
 - Work on determining spatial options in Local Plans can commence alongside this;
- 1.5 The endorsed timetable includes a 12-18 month process which identifies the following relevant milestones:
- Further identification and refinement of Oxford's unmet housing need by March 2015;
 - The outcome of a Green Belt Review by June 2015;
 - Distribution of unmet need amongst Districts by August 2015.
- 1.6 Having regard to the Vale's Local Development Scheme, this indicates that the distribution of unmet needs is expected to have been completed before the end of the LPP1 examination and the adoption of LPP1 in October 2015. On this basis, LPP1 would clearly be out of date on adoption as it does not take account

of Oxford's unmet needs. This clearly cannot be considered a sound approach having regard to the NPPF (notably paragraphs 47, 157 and 179).

- 1.7 NPPF paragraph 47 requires authorities to ensure Local Plans meet the full objectively assessed needs in the housing market area, paragraph 157 requires plans to take account of longer term requirements and be kept up to date and paragraph 179 that strategic priorities (including the homes needed in the area) are properly co-ordinated and reflected in individual Local Plans.
- 1.8 If LPP1 proceeds to adoption in advance of addressing Oxford's unmet housing needs it clearly cannot address the above requirements of the NPPF.
- 1.9 It must be noted that the Oxford City Council have now published the Oxford Housing Land Availability and Unmet Need Assessment (URS, December 2014). This study has identified a maximum potential for 10,212 dwelling within Oxford City to 2031.
- 1.10 Table 11 of this assessment then quantifies the extent of unmet housing need against the objectively assessed housing needs for Oxford as presented in the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014. It concludes that there will be an unmet need of between 13,788 and 21,788 homes with a mid-point of 17,788 homes. This is a significant quantum of unmet housing need.
- 1.11 Given this recent evidence, the extent to which Oxford's unmet housing needs will need to be met in the Vale of White Horse District should inform the Vale's LPP1. It is noted that this may include a Green Belt review to identify sites close to and on the edge of Oxford. This will include land within the Vale of White Horse District.
- 1.12 Given the scale of unmet need, however, further housing may need to be delivered elsewhere in the Vale of White Horse District. Given the strong economic base of the South East Vale Sub Area and Science Vale in particular, further opportunities to meet Oxford's unmet housing needs in this area may also be required and should be explored.
- 1.13 In failing to address Oxford's housing needs, it is clear that LPP1 will be left behind and will be out of date, even before it is adopted. This is not a sound approach as it is not positively prepared, not justified, not effective and not

consistent with national policy. The development strategy and housing targets of LPP1 should address the unmet housing needs of Oxford.

2.0 CORE POLICY 3: SETTLEMENT HIERARCHY

- 2.1 Mr and Mrs Comley support the approach to the Settlement Hierarchy in so far as it identifies East Challow as a Local Service Centre and a sustainable location for new development. It is not clear, however, if this is an error as Figure 4.2 identifies East Challow as a Larger Village. Indeed East Challow is presented as a Larger Village in the evidence including the Town and Village Facilities Study Update 2014. In any event, East Challow is a sustainable location for new development.
- 2.2 Mr and Mrs Comley, however, object to the identification of East Challow within the Western Vale Sub-area. The village should be included within the South East Vale Sub Area and Science Vale area as it has been in previous iterations of the Local Plan Part 1.
- 2.3 East Challow is located approximately 1km west of Wantage – the market town in this area. Wantage is one of the main shopping and commercial centres in the District and together with Grove provides higher order facilities and employment in close proximity to residents at East Challow.
- 2.4 As highlighted at paragraph 5.109 of LPP1, Faringdon is the main service centre in the Western Vale Sub Area. It is 13km from East Challow in comparison to the 1km between East Challow and Wantage.
- 2.5 Given the proximity of East Challow and Wantage there is clearly a functional relationship between these settlements. Core Policy 3 (and subsequent Sub Area Strategy Policies 15 and 20) do not reflect this functional relationship and separate East Challow and Wantage into different sub-areas. There is no logic to this approach and it is unjustified.
- 2.6 The relationship between East Challow and Wantage was accurately reflected in previous iterations of the Local Plan. The settlement has consistently being included in the South East Vale Sub Area and associated with Wantage and the Science Vale area.
- 2.7 Prior to the revocation of the South East Plan, East Challow was located within the Central Oxfordshire Sub-regional Strategy along with Wantage. This was

reflected in the Core Strategy Preferred Options 2009 Consultation document. East Challow was then included in the South East Vale Sub Area in the Local Plan Part 1 February 2013 Consultation.

- 2.8 The association of East Challow and Wantage is most clearly highlighted in the Local Plan Part 1 Housing Consultation Update February 2014. Paragraph 4.43 of the February 2014 consultation document stated that:

'...we have identified a suitable site for development to the north-west of East Challow, as this is one of our more sustainable villages. It is within the Science Vale Oxford area and is in close proximity to the market town of Wantage and the higher order services and facilities it offers.'

- 2.9 Correspondingly, Figure 4.21 of the February 2014 consultation document clearly identifies East Challow within the Science Vale Area. It is also noted that in assessing options for the housing supply ring fence of the current LPP1 Core Policy 5, Figure 14.1 of the Sustainability Appraisal Report (URS, October 2014) clearly identifies East Challow in the Science Vale area.
- 2.10 In further illustration of the links between East Challow, Wantage and South East Vale Sub Area, Core Policies 17 and 18 of LPP1 safeguard and require contributions to a West Wantage Link Road between Grove Technology Park, Grove Airfield and East Challow. This road will provide further links between East Challow, Grove and Wantage and the Science Vale area. Paragraph 5.106 of LPP1 also makes reference to the settlement gap between East Challow, Wantage and Grove (and subject to Saved Local Plan Policy NE10).
- 2.11 In contrast, there is only a passing reference to East Challow in the Western Vale Sub Area Strategy and no reference to the above link road or settlement gap policies. No reasoned justification is offered as to the shift in strategy to separate East Challow from its market town Wantage and the Science Vale Area. This is unsound and unjustified.
- 2.12 Mr and Mrs Comley consider that East Challow should be reinstated as a settlement within the South East Vale Sub Area and within the Science Vale area in accordance with the previous iterations of the LPP1.

3.0 CORE POLICY 4: MEETING OUR HOUSING NEEDS

- 3.1 Having regard to the representations made by Mr and Mrs Comley in relation to Core Policy 2, the housing requirement of Core Policy 4 is also unsound for failing to address Oxford's unmet housing needs at the current time.
- 3.2 Furthermore, whilst some of Oxford's housing need may be met on the edge of Oxford and within the Vale, the scale of unmet need will require a range of options to be considered.
- 3.3 All areas of the Vale may need to help address Oxford's unmet housing needs. Given the employment base of Science Vale and the South Eastern Vale sub area further opportunities to meet needs in this area, in particular, should be explored and this should include settlements such as Wantage and Grove and villages such as East Challow which are located in close proximity to the areas of employment growth.

4.0 CORE POLICY 5: HOUSING LAND SUPPLY RING FENCE

- 4.1 Mr and Mrs Comley object to the proposed housing land supply ring fence on the basis that it will threaten the overall delivery of housing and economic growth. The ring fence should be drawn more widely to include the whole of the South East Vale Sub Area, including East Challow.
- 4.2 The premise of the ring fence is that the employment growth demands and potential of the Science Vale area require a significant proportion of the Vale's housing to be delivered in close proximity to these employment growth areas. In reflection of this, paragraph 4.18 of the LPP1 document notes that 75% of strategic housing growth is allocated within close proximity to the Science Vale business locations. Paragraph 4.17 of the LPP1 document describes these business locations and includes Wantage.
- 4.3 The central premise of the ring fence is, therefore, to minimise the need to travel. In addition, the proposed strategic housing allocations in the Science Vale area are linked to the provision of new infrastructure. It is suggested that this infrastructure cannot be delivered without the planned housing.
- 4.4 The housing supply ring fence area proposed by Policy CP5, is noted as a subset of the wider Science Vale geographical area and is primarily focussed on the proposed strategic housing allocation sites – the majority of which involve 1000+ homes either on their own or together with adjoining sites.

- 4.5 There is merit in the overall premise of the ring fence in so far as it seeks to focus new housing development in the Science Vale area to minimise the need to travel. In Mr and Mrs Comley's view, however, the ring fence has been drawn too tightly and risks the under delivery of housing in the Science Vale area.
- 4.6 Large strategic sites often have lengthy and complex planning processes, significant pre-commencement conditions, substantial infrastructure requirements and complex landownership issues. It is not untypical that housing delivery on strategic sites is delayed for a variety of reasons. Indeed, it appears this has occurred in the past at Didcot. Should the delivery of housing on strategic allocations be delayed, the delivery of housing to meet the labour demands and growth potential of Science Vale and the overall development strategy will be threatened.
- 4.7 This risk can be minimised through drawing a wider ring fence which includes the wider Science Vale area. Should delivery at the strategic growth locations be delayed, it is considered appropriate that other sustainable development locations provide housing to maintain the supply and to meet the labour demands of economic growth in Science Vale.
- 4.8 The release of smaller, sustainable and deliverable housing sites in settlements such as East Challow, which are closely related to the employment locations of the Science Vale area, would help maintain the housing land supply, whilst continuing to minimise the need to travel. Such sites could also make appropriate contributions towards infrastructure through the Community Infrastructure Levy.
- 4.9 If a housing land supply deficit arises during the plan period, the presumption in favour of sustainable development would apply. In applying the presumption, the Council can still give due regard to any impact on the deliverability of strategic allocations, infrastructure and the overall development strategy. Dues consideration can also be given to national designations such as the North Wessex Downs AONB which cover much of the southern part of the Science Vale area. Any risk to the deliverability of the strategy by applying a wider housing land supply ring fence can be appropriately managed through the development management process.

4.10 A number of options for the ring fence are considered in Section 14 of the Sustainability Appraisal ('SA'). Option 1 proposed a Science Vale ring fence and an area which broadly equates the South East Vale Sub Area. This area is shown in Figure 14.1 of the SA and it is noted that it includes East Challow. Options 2 and 3 present subsets of the Science Vale Area and Option 4 no ring fence.

4.11 The SA report (Paragraph 14.3.2) acknowledges that:

'The risk of not maintaining a five-year housing land supply (by allocated sites not coming forward) has the potential to undermine the spatial strategy – particularly in the south east of the Vale where sites are required to come forward in order to deliver planned infrastructure.'

4.12 The SA report (Paragraph 14.3.2) considers that Options A, B and C all seek to limit the leakage of housing development to less-sustainable locations and perform more favourable than Option D. No options were assessed to lead to significant negative effects.

4.13 The SA report appears to acknowledge the risk of allocated sites not coming forward, yet LPP1 and the SA report promote a strategy which would exacerbate this risk by restricting housing delivery to these sites and limit the ability of smaller non-strategic sites or other allocations in sustainable locations being brought forward to maintain a housing land supply.

4.14 It is not considered that the risk to housing delivery and to economic growth, and potential to address it through development in other sustainable locations in the Science Vale area (as in Option A), has been adequately reflected in the assessment of options in the SA. The assessment of Option A is unduly negative including with regard sustainability objectives which are more relevant at the specific site level – for example with regard impacts on heritage, biodiversity, and social exclusion.

4.15 Having regard to the above, Mr and Mrs Comley consider that the housing land supply ring fence would be more effectively applied to the South Eastern Vale Sub Area and including East Challow (which is closely related to Wantage and should be included within the South East Vale sub area) This would also enable a simpler and more practical approach to housing land supply in the remaining sub areas.

5.0 CORE POLICY 15: SPATIAL STRATEGY FOR THE SOUTH EAST VALE SUB AREA

- 5.1 Mr and Mrs Comley object to this policy on the basis that East Challow has been omitted from the South East Vale sub area. As a consequence Core Policy 15 is unjustified. Representations to this effect have been set out in more detail in relation to Core Policy 3.

6.0 CORE POLICY 20: SPATIAL STRATEGY FOR THE WESTERN VALE SUB AREA

- 6.1 Mr and Mrs Comley object to this policy on the basis that East Challow has been incorrectly included in the Western Vale sub area. As a consequence Core Policy 20 is unjustified. Representations to this effect have been set out in more detail in relation to Core Policy 3.

7.0 LAND OFF CANAL WAY, EAST CHALLOW –DEVELOPMENT POTENTIAL

- 7.1 The village of East Challow lies 1km west of Wantage on the undulating land just beyond the North Wessex Downs. The land off Canal Way comprises 3.97ha of agricultural land (pasture) on the western edge of the village. A plan of the site is attached as **Appendix 1**. It adjoins existing modern residential development on its western boundary. The land rises to the south with the site forming part of the lower slopes and one of the lower parts of the settlement.
- 7.2 Canal Way is approximately 6m wide with footways on either side and provides access to the site. The village amenities including the church, village hall, public house and primary school lie in close proximity and within walking distance of the site. An hourly bus service connects the village to Wantage with a bus stop adjacent to Canal Way and the A417. Bus services also connect East Challow to Faringdon.
- 7.3 The northern boundary is formed by a tree lined hedgerow beyond which is a remnant of the Berks-Wilts Canal, a footpath and existing residential development. A public footpath runs along part of southern boundary of the site behind a hedgerow. Where this hedgerow is strong it forms a good screen to the lower land forming the site beyond. The remaining part of the northern site boundary and eastern boundary are marked by post and rail fences.
- 7.4 Housing development forming the edge of Wantage can be seen from the site on higher ground 1km to the west. In views back towards the site the existing

housing at Canal Way presents a hard edge to the countryside and the site is seen in the context of the existing settlement. A former works is being redeveloped to provide new housing immediately to the south west of the site.

- 7.5 The site falls outside the North Wessex Downs AONB which lies approximately 1 km to the south. There are no heritage or nature designations within the site although a remnant of the Berks-Wilts Canal adjoins. Whilst the site forms part of the settlement gap between East Challow and Wantage (and subject to Saved Local Plan Policy NE10) this gap can be retained whilst accommodating development on the site. Furthermore, with appropriate landscaping, development can help to soften the existing hard urban edge to the village.
- 7.6 The site is considered in the Vale of White Horse Strategic Housing Land Availability Assessment (SHLAA) and the western field adjoining Canal Way (1.2ha) is considered suitable for the development of around 30 dwellings. Mr and Mrs Comley control the site and confirm that it is available for development.
- 7.7 The site represents a deliverable and sustainable development opportunity which may be summarised as:
- Potential for around 30 dwellings on the western field (1.2ha) adjoining Canal Way
 - Vehicular and pedestrian access via existing roads (Canal Way)
 - Within walking distance of village amenities and an hourly bus service to Wantage and Faringdon.
 - Site not subject to any national designations. Gap between Wantage and East Challow can be retained and setting of historic Berks-Wilts Canal respected.
 - Well integrated with the existing settlement and an opportunity to improve the existing urban edge
 - Considered suitable for development in the Vale of White Horse District Council SHLAA