



Boyer
PLANNING

LAND NORTH OF FIELD CLOSE / THE PADDOCK, KINGSTON BAGPUIZE WITH SOUTHMOOR

**Response to the Draft Local Plan 2031 Part 1: Strategic Sites and
Policies consultation**

Prepared by Boyer Planning on behalf of David Wilson Homes Southern
December 2014

REPORT CONTROL

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Appendix

Appendix one – Site Location Plan

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer Planning Limited on behalf of David Wilson Homes Southern in respect of the Vale of White Horse District Council Local Plan Part 1 – Strategic Sites and Policies consultation. The document follows on from the previous consultations on the earlier versions of the plan in February 2013 and April 2014.
- 1.2 Our client has important land interests in the Local Plan area, including at Southmoor (see Site Location Plan at Appendix One). A full detailed planning application has been submitted for the residential development of the site for 73 dwellings with associated access, parking, landscaping and open space and has been allocated the reference P14/V2820/FUL (see Proposed Layout at Appendix Two).
- 1.3 As such this response focuses on the overall strategy for the Vale with a particular focus on those elements relevant to our client's landholding at Southmoor.
- 1.4 Each of our responses relates to a particular paragraph or policy contained within the consultation document and this statement is structured accordingly.

2. RESPONSE TO CONSULTATION

General comments on Content / Structure of Plan

- 2.1 Chapter One of the consultation draft sets out the introduction to the plan and outlines the Council's intentions to produce its Local Plan in two parts:

- Part 1: Strategic Sites and Policies
- Part 2: Detailed Policies and Local Sites

- 2.2 We question whether this approach is the most appropriate for the Vale in the context of the latest government guidance on this matter, contained within the NPPG. Paragraph 13 of the Local Plans section (Reference ID: 12-013-20140306) states:

“Should all the Local Plan policies be contained in one document?”

The National Planning Policy Framework makes clear that the Government’s preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.”

- 2.3 There is no justification evident in the consultation draft for why a single Local Plan document is not being proposed, as indeed it was originally by the Council. We consider that the Local Plan being spread over two separate sections as well as the Science Vale Area Action Plan and any likely Neighbourhood Plans that may come forward would be unnecessarily unwieldy and contrary to the Government's advice to local authorities. A single plan would also enable a more cohesive strategy to be formulated from the outset with appropriate distribution of housing and development across the District, which would provide a greater degree of certainty in respect of future growth.
- 2.4 This matter is exacerbated by the potential requirement for a full or focused partial review of the Local Plan 2031 as identified under draft Core Policy 2 in response to the potential unmet housing need from Oxford City. The Council's Local Development Scheme (September 2014) currently envisages the adoption of the Local Plan Part 1 in October 2015, with adoption of the Science Vale Action Plan in June 2015 and the Local Plan Part 2 following in November 2017. Clearly if a full or focused partial review of the Local Plan Part 1 is required, this is likely to have significant implications for the timescales for the preparation of the Science Vale Action Plan and the Local Plan Part 2. Given the above, it is considered that this lends further weight to the argument for a single Local Plan to be prepared for the District.
- 2.5 Finally, the focus of this document on sites larger than 200 units is somewhat unhelpful given the Council's persistent under delivery of housing, and the ongoing absence of a five year housing land supply. It is apparent that it is those sites which are smaller in nature that are being brought forward in the District, and those larger 'strategic sites' have failed to deliver. It is well recorded that the failure of strategic sites is the reason why the Council do not have an up to date supply. Given the nature of the District, being largely rural, it is likely to be appropriate to spread development needs across settlements in order to meet the housing numbers. This is not, and will not, be achieved in this current document resulting in likely ongoing housing land supply issues,

Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire

- 2.6 The Policy defines how the Council will work with all Oxfordshire local authorities in accordance with the Oxfordshire Statement of Cooperation. The Policy recognises that Oxford City may be unable to meet its objectively assessed housing need within its administrative boundary. The Policy proposes that:

“Whilst the extent to which Oxford City can meet its own needs is robustly tested and agreed, the Council will first seek to meet its own housing needs in full, to help ensure that the needs of both the district and the housing market area as a whole are met as quickly as possible.”

- 2.7 If it is identified and agreed that any unmet housing need is required to be accommodated within the Vale of White Horse District, the Council will either:

- *“undertake a full or focused partial review of the Local Plan 2031, or*
- *allocate appropriate housing sites through a subsequent development plan document in conformity with the Spatial Strategy set out in the Local Plan 2031.”*

- 2.8 Paragraph 182 of the NPPF states that, to be considered “sound”, a Local Plan should be, inter alia:

“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.”

- 2.9 Core Policy 2 acknowledges there is likely to be unmet needs arising from neighbouring authorities and suggests that the Council will be willing to fulfil the duty to cooperate in due course. However, this statement by the Council alone is not sufficient to enable the duty to be discharged. As such, failure to fully consider the issue of unmet needs in the HMA in preparation of this plan brings into question its soundness.
- 2.10 The likely extent of the unmet need in Oxford City is considerable. The 2014 SHMA has established that Oxford City needs between 24,000 and 32,000 dwellings over the period 2011 to 2031. The most recent 2014 update to the SHLAA has assessed the opportunities that exist to develop new housing in Oxford. The latest update (2014) identifies the capacity for 10,212 homes in the period 2011-2031. Therefore, the city can only meet between a half and a third of its housing requirement.
- 2.11 If the Vale of White Horse District Council is not prepared to address the Oxford City problem in this version of its Local Plan, then the Plan will need to include a commitment to review the Plan by a specified date. The inspector examining the Cherwell Local Plan did recommend that a review date was agreed. This review date will need to be supported by all the other Oxfordshire authorities to ensure that either the preparation or the review of all the Oxfordshire local plans will be undertaken by a common commencement date. We consider that this preparation or review date should be concluded by 2016. This commitment to a review must include an agreement that the objectively assessed needs identified in the SHMA 2014 will be met by each Oxfordshire authority and that the unmet need for Oxford City will be apportioned among the hinterland authorities.

- 2.12 Our concerns with regards to the implications of the Council's current approach with regards to the timescales for the preparation of the Local Plan Part 2 have been discussed above and as such are not repeated here.

Core Policy 3: Settlement Hierarchy

- 2.13 Core Policy 3 establishes the settlement hierarchy for the District with four tiers of settlements proposed. Concern is raised regarding the current definition for local service centres which states:

"Local Service Centres are defined as Larger Villages or neighbourhoods to larger settlements with a level of facilities and services and local employment to provide the next best opportunities for sustainable development outside the Market Towns."

- 2.14 Whilst we raise no objection to the classification of local service centres, it is considered that the current definition is unclear in its reference to local service centres being defined as larger villages which are themselves a separate category of settlement. It is recognised that those settlements classified as local service centres benefit from additional facilities and services above those in the larger villages and as such the difference in the classification between these two orders of settlements should be expressed more clearly to prevent uncertainty.

- 2.15 With regards to Larger Villages, the definition states:

"Larger Villages are defined as settlements with a more limited range of employment, services and facilities. Unallocated development will be limited to providing for local needs and to support employment, services and facilities within local communities."

- 2.16 It is considered that this adds further justification for the preparation of a single Local Plan document. No trajectory of phasing provisions have been published of when the strategic sites are anticipated delivery of strategic sites, which as noted has led to the current shortfall in five year housing land supply. Greater consideration needs to be given to the delivery of units across the plan period. Smaller sites generally have shorter lead in times and therefore the allocation of such sites in key locations could help to bridge the gap in supply until such time as the larger strategic allocations start to deliver units whilst allowing the Council to forward plan the necessary infrastructure rather than reacting to speculative applications due to a shortfall in five year housing land supply. Given the concerns raised regarding the timescales for the Local Plan Part 2 and the restrictions under Core Policy 3 this adds further weight to the recommended approach of a single Local Plan.

Core Policy 4: Meeting Our Housing Needs

- 2.17 The Policy sets a housing target of at least 20,560 dwellings over the period 2011 to 2031. Subject to our comments set out above regarding the Oxford City housing requirement, we fully support the housing target for the Vale of White Horse District providing for the full objectively assessed needs of the Vale as set out in the SHMA.
- 2.18 The Local Plan Part 1 only allocates sites which can accommodate 200 dwellings or more. A total of 13,960 dwellings are proposed to be allocated through the Local Plan Part 1 with sites either at Market Towns, Local Service Centres or Larger Villages.
- 2.19 The consideration of larger villages within this version of the Local Plan is welcomed. However it is considered that the availability of smaller sites should also be the subject of more detailed

assessment. Up to 1000 dwellings are proposed to be identified through a future Local Plan Part 2 which will be an important contribution towards the Council's housing target.

- 2.20 As discussed above, no trajectory or phasing provisions have been published of when the strategic sites are anticipated to start delivering units. Given the previous issues experienced in the Vale with the slower than anticipated delivery of strategic sites which has led to the current shortfall in five year housing land supply, greater consideration needs to be given to the delivery of units across the plan period. Smaller sites generally have shorter lead in times and therefore the allocation of such sites in key locations could help to bridge the gap in supply until such time as the larger strategic allocations start to deliver units whilst allowing the Council to forward plan the necessary infrastructure rather than reacting to speculative applications due to a shortfall in five year housing land supply. Given the concerns raised regarding the timescales for the Local Plan Part 2 and the restrictions under Core Policy 3 this adds further weight to the recommended approach of a single Local Plan.

- 2.21 Furthermore, it is noted that when the draft consultation version of the Local Plan Part 1 was considered by Cabinet, the officer's report highlighted that:

"The housing delivery trajectory from the site package together with planning commitments will provide a deliverable five year housing land supply backlog in full over the remainder of the plan period to 2031. The government would prefer backlog to be made up in the first five years from adoption ie 2015/16 – 2020/21. However, based on our housing land supply position and the delivery trajectories of the site options available it is not possible to identify a deliverable and sustainable package of sites that could make up all housing backlog in the shorter timeframe."

- 2.22 The Council are therefore proposing to address their five year housing land supply shortfall using the Liverpool method. It is considered that this approach is unsound, particularly in light of the fact that it is the Sedgefield method which on numerous occasions the Secretary of State and Inspectors have found is most closely aligned with the principles of the NPPF, NPPG and the PAS 'Ten Key Principles.'
- 2.23 It is considered that the Council's admission that they will be unable to make up their previous shortfall in the first five year period adds further weight to the need for a single Local Plan to be prepared, and the historic performance of the Council further reinforces the importance of the use of the Sedgefield method. This approach would allow the early identification of smaller scale sites for allocation which will have shorter lead in times to delivery and would help to restore the Council's five year housing land supply shortfall at an earlier stage than currently envisaged.

Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area

- 2.24 Core Policy 8 establishes the spatial strategy for the sub-area and the housing requirement for it. At least 5,438 new homes are to be delivered in the sub-area between 2011 and 2031 with 1,990 dwellings to be delivered through strategic allocations. Up to 722 dwellings are to be allocated through the Local Plan Part 2 with a further 563 dwellings to be delivered through windfalls. From the above it is clear that smaller sites will be a key factor in achieving the housing requirement for the sub-area.
- 2.25 We support the recognition of the sustainability of Kingston Bagpuize with Southmoor to accommodate additional residential development during the plan period through the proposed

allocation of land East of Kingston Bagpuize with Southmoor. The village is sustainable in that it has a number of local services and facilities such as a parade of shops, primary school, hotel, local business park with employment opportunities and pubs. It also has a goodbus service with twice hourly services between Oxford and Swindon six days a week with a reduced service on Sundays. As such it is considered that the village has the capacity to accommodate additional residential development in the form of smaller sites, in addition to the proposed allocation of land East of Kingston Bagpuize with Southmoor. Indeed, we consider our client's site is one such site which is deliverable and available now – as set out in the current planning application submission.

3. LAND AT KINGSTON BAGPUIZE WITH SOUTHMOOR

- 3.1 A full detailed planning application has been submitted for the residential development of the site for 73 dwellings with associated access, parking, landscaping and open space and has been allocated the reference P14/V2820/FUL. 40% of the dwellings are proposed as affordable housing (29 dwellings).
- 3.2 The proposed access to the residential development will be via Field Close, which is located on the south west corner of the site. Field Close is an existing residential road which is 5.5m wide and at the access point is currently a turning head area. In accordance with the current OCC guidance, the 5.5m width of The Paddock conforms to the standards for a "Type 3" Major Access Road. A Type 3 road can accommodate up to 200 dwellings on a cul-de-sac, which is significantly more than The Paddock currently serves. Field Close also has existing footways along both sides of the road and so is considered a safe access route for both vehicles and pedestrians.
- 3.3 A public exhibition has been held by the applicants to help inform the proposals prior to the submission of the planning application.

Site and Surroundings

Location

- 3.4 The site is located immediately to the northwest of the existing settlement of Kingston Bagpuize with Southmoor and is surrounded by existing residential development to the south and west. To the east, on the other side of the public footpath, the site is bounded by a Taylor Wimpey development (currently under construction) beyond which is existing residential development. To the north, the site is bounded by the A420, and a mature landscaping bund, which contains the site from the surrounding countryside. Furthermore views into the site from this location are screened by the existing mature tree and hedgerow along this boundary.
- 3.5 To the south the site is almost entirely contained by the boundary fencing and properties associated with Soden Place, Field Close and The Paddock. To the west the site is again contained by the settlement associated with Beggars Lane that comprises a series of large detached properties backing onto the site with associated landscaped rear gardens. These boundaries are all well-defined, robust and enduring providing a significant level of containment to the fields within the site, limiting any relationship with the wider landscape setting of farmland to the north.
- 3.6 The site is located within walking distance of services and facilities within Southmoor, and is well served by bus services stopping within 100m. The existing bus routes are located along Faringdon Road to the south of the site, which run in an east/west direction through Kingston Bagpuize with Southmoor and Longworth respectively. Faringdon Road is also where the main community facilities for the area are located, including a post office, a parade of local shops and pubs/restaurants etc.

Existing Character

- 3.7 The site, which incorporates Southmoor Riding Centre, comprises 2.61 hectares (6.45 acres) of land. The site is under permanent pasture and is subdivided into paddocks for grazing horses by Southmoor Riding Centre.
- 3.8 There are no landscape designations applicable to the site. In landscape terms, the site is relatively flat and low lying at approximately 80m AOD set within an established and robust framework of settlement, highways and landscape infrastructure that limits any relationship with the wider landscape setting.
- 3.9 The site largely comprises semi-improved grassland, the nature conservation value of which is limited by its current use as intensively grazed horse pasture. The site is not designated for ecological purposes and no significant effects on ecological habitats or protected species are expected.
- 3.10 There are no watercourses within the site and the site does not fall within a Groundwater Source Protection Zone. Furthermore, the site is located within an area classified as having low probability of flooding (Flood Zone 1) by the Environment Agency.

Council's Assessment through the SHLAA & IHSPD

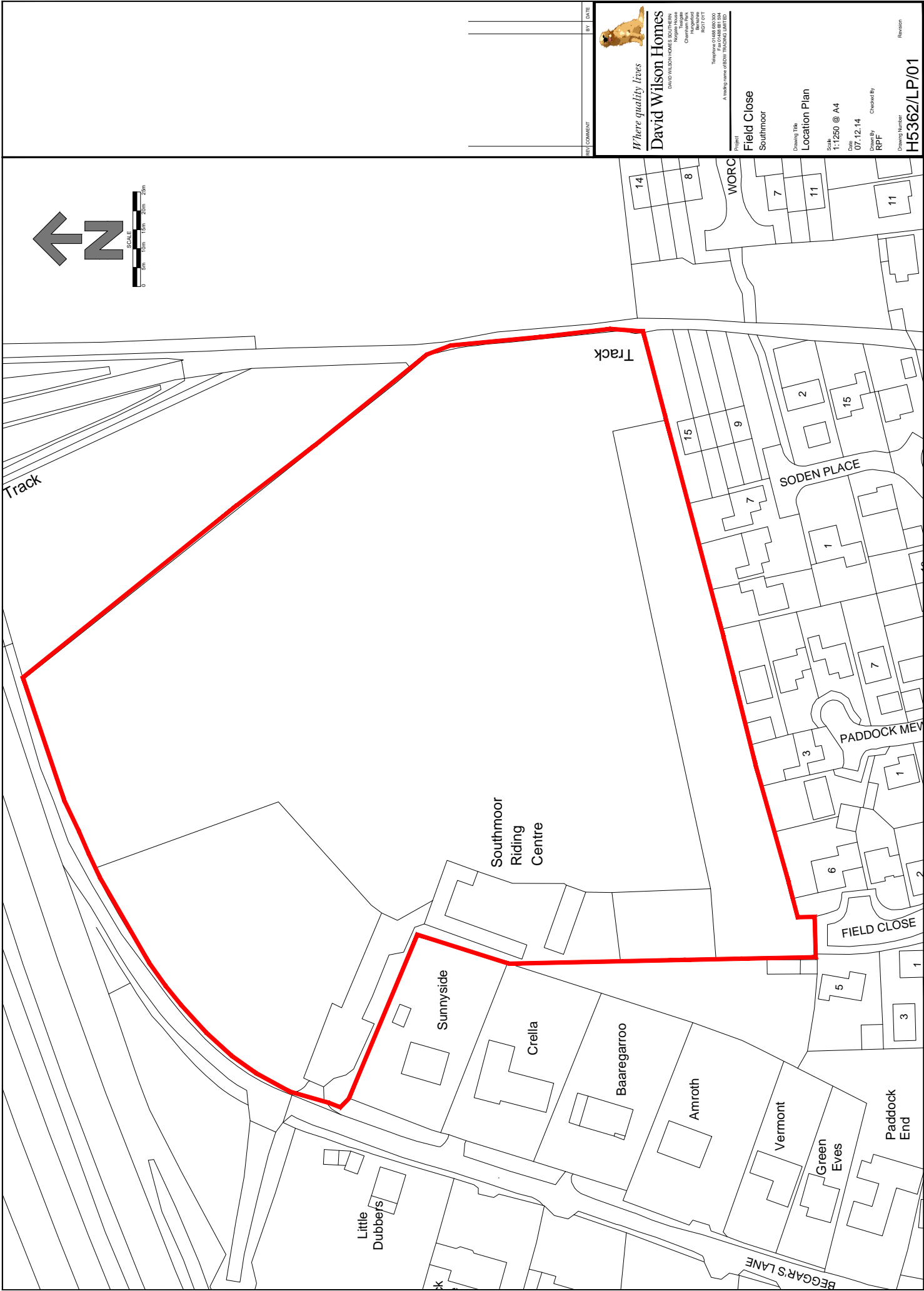
- 3.11 The site has been considered within the SHLAA update February 2014 under KBAG03. Within the assessment, the site is considered suitable in respect of both phase 1 and phase 2 considerations, and capable of accommodating approximately 63 dwellings, although the actual capacity will be established through a masterplan assessment.
- 3.12 Previously, the land west of Draycott Road, which included land north of Field Close/The Paddock, was submitted for consideration through the Interim Housing Supply Policy which the Council had sought to introduce to address their five year housing land supply shortfall before the NPPF was confirmed. The site was considered as two separate elements: west of Draycott Road and west of Waggon Place, off Field Close (herein referred to as land north of Field Close/The Paddock). Both sites were assessed as not being subject to any high level constraints and the majority of the conclusions were applicable to both sites. The Council highlighted the following positive elements of the sites:
- Relate well to the existing built form
 - Surrounded by residential development on two sides
 - Would extend the village boundary in line with development to the east of Draycott Road
 - Near to a good public transport route with buses half hourly to Swindon and Oxford
 - Restricted views of the site
 - Within walking distance of village amenities
- 3.13 The only matter which was identified as requiring addressing was the potential noise / air pollution from the A420. This matter could be dealt with as part of the detailed design proposals for the site and is not therefore an in principle constraint to development of the site. An extended and planted noise bund will be proposed to ensure that there are no issues regarding noise or air pollution.
- 3.14 In relation to land north of Field Close / The Paddock, the Council highlighted that the site is slightly further away from the village centre. The site is however bounded by existing residential

development to the west which is located further from the village centre and the contained nature of the site would form a logical extension to the settlement. We note that it represents a more intrinsic position within the village than the proposed site to the east of the village.

Conclusion

- 3.15 The scheme has been designed to be an attractive, distinctive and legible development arranged around a hierarchy of roads, key spaces and built and natural features, and is considered to be of a suitable scale so as to integrate within its setting.
- 3.16 In terms of sustainability, the design team have followed best practice by providing a design that reduces the energy use, an enhanced building envelope, enhanced building air tightness, equipment to reduce energy use and equipment to enable efficient operation.
- 3.17 Full consultation has been undertaken with the local community in respect of the planning application, and adjustments made to the scheme in light of the comments that have been received.
- 3.18 The Council have an acknowledged shortfall in its five year housing land supply and the site will make an important contribution towards restoring this supply. In addition, the Government's policy for economic growth supports the grant of planning permission for the proposed residential development of the site, with its potential to assist in meeting market and affordable housing requirements as well as the growth of jobs and therefore the overall economy.
- 3.19 As is clear from the Draft Local Plan Part 1, the Council itself clearly recognises the suitability of Kingston Bagpuize with Southmoor as a suitable location to accommodate additional development. Although at this stage the application site is not proposed to be allocated in the Local Plan Part 1, this is because it does not meet the 200 dwelling threshold rather than because of any technical constraint, as shown by the Council's SHLAA assessment of the site as 'suitable in principle' for development. As such it is considered that the site is a suitable location for residential development, in a sustainable settlement which would provide an important contribution in helping to restore the Council's five year housing land supply in a shorter time frame than currently being planned for by the Council which would accord with the advice contained in the NPPF and NPPG.

APPENDIX ONE – SITE LOCATION PLAN





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APPENDIX TWO – PROPOSED LAYOUT

SCHEDULE OF ACCOMODATION

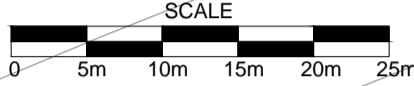
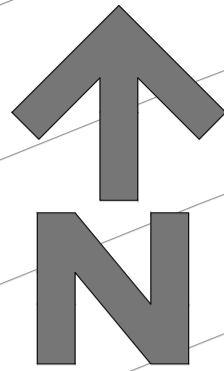
Affordable

Type		
SF11	1 BED	8
SH27	2 BED	19
SH39	3 BED	2
Sub-Total		29

Private

Type		
H525	5 BED	2
H577	5 BED	2
H536	5 BED	2
H436	4 BED	5
H433	4 BED	5
H469	4 BED	4
H497	4 BED	8
T323	3 BED	2
P315	3 BED	4
P341	3 BED	3
P286	2 BED	7
Sub-Total		44

Total 73



- KEY**
- TREES TO BE REMOVED
 - INDICATIVE LANDSCAPING
 - EXISTING TREES TO BE RETAINED ON SITE
 - EXISTING TREES TO BE RETAINED OFF SITE
 - 1.8m HIGH STONE SCREEN WALL (WITH ANGLED STONE COPING)
 - 1.8m HIGH TIMBER CLOSE BOARD FENCE (Rear boundaries topped with 300mm trellis)
 - ACOUSTIC FENCING (See Seperate details)
 - 1.8m HIGH TIMBER GATE
 - PERSONAL DOOR TO GARAGE
 - 1.8m HIGH LOCKABLE TIMBER GATE (Relevant residents to hold keys only)
 - BRACKEN COLOUR BLOCK PAVING - HERRINGBONE BOND
 - MARSHALLS 'PRIORA' OR SIMILAR
 - BRINDLE COLOUR BLOCK PAVING - HERRINGBONE BOND
 - MARSHALLS 'PRIORA' OR SIMILAR
 - AFFORDABLE DWELLING
 - BIN COLLECTION POINT
 - PROPOSED STREET LIGHTING COLUMN
 - 1.2m HIGH BLACK VERTICAL RAILINGS
 - 1.2m HIGH TIMBER POST & RAIL FENCE

191 RESIDENTIAL PARKING SPACES
9 RESIDENTIAL VISITOR PARKING SPACES
2.61 RESIDENTIAL PARKING SPACES PER DWELLING
GROSS SITE AREA = 2.61 HECTARES
NET SITE AREA = 2.24 HECTARES
DENSITY 32.58 DWELLINGS PER HECTARES
PUBLIC OPEN SPACE = 0.38 HECTARES

REV COMMENT BY DATE

Where quality lives

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Project
Field Close
Southmoor

Drawing Title
Planning Layout

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Date
24.11.14

Drawn By
RPF

Checked By

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