



Hearing Statement
Respondent Reference: 831779

**EXAMINATION INTO THE VALE OF WHITE
HORSE LOCAL PLAN 2031 PART 1:
STRATEGIC SITES AND POLICIES**

August 2015

Introduction

1. This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2011-2031: Part 1 on behalf of the below listed landowners.
2. This statement responds to each of the issues raised by the Inspector in his Matters and Issues in turn.
3. Represented landowners
 - Robert Graham Boyles
 - Geoffrey John Boyles
 - Jean Ellen Frances Boyles
 - Elizabeth Ann Boyles
 - Robert Gee
 - John-Michael Gee
 - Richard Venables
 - Tracie Palfreyman
 - Julie Van Onselen
 - Lisa Venables
 - John Rand
 - Denise Fletcher
 - Lucy Hick

Word count: 2,799 (excluding Appendix and Inspector's questions).

Matter 1 – Duty to Co-operate and other Legal Requirements

“1.1 Has the Council satisfactorily discharged its Duty to Co-operate to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, including particular minerals and waste and housing?”

4. The draft Plan makes reference to the duty to co-operate and to the issue of meeting Oxford's unmet housing needs. This is being addressed by the Oxfordshire Growth Board (OGB), the make up of which is explained in Topic Paper 4 and of which the Council forms a partner.
5. The Council has accepted that it should meet its own objectively assessed need for housing and its draft Plan seeks to do so. This is welcomed.
6. The draft Plan also indicates that the Council is proposing a review, dependent on the outcome of the OGB discussions, in 12 to 18 months in order to address issues which arise for the district from the OGB's conclusions, which include a study of the green belt. This is a two stage approach to strategic planning issues which introduces complications when dealing with green belts, in particular.
7. Paragraph 83 of the Framework makes clear that *“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”*.
8. The Framework also makes clear that LPAs should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. This presents a difficulty for this LPA which seeks to establish green belt boundaries in advance of the conclusions of the OGB in that its green belt boundaries may be regarded as being pre-determined and unable to assist in meeting the unmet City needs. There should be a clear statement in this plan that any review in order to accommodate the City's unmet needs would also consider areas which may be shown in this Plan to be

within the green belt to avoid pre-determination of the most appropriate strategic approach to meeting those needs.

9. The Council's LDS indicates that work on a review of this Part 1 Plan would lead to adoption by December 2017, beyond the period of 12 to 18 months suggested when the plan was prepared and beyond the timetable included in the Cherwell Local Plan (review by July 2017). Given the extent of housing need in Oxford, a co-ordinated approach to plan preparation and adoption in order to meet the unmet housing need is to be preferred. The Inspector involved in the examination of the Cherwell Local Plan accepted a two stage approach to plan-making with a commitment from the Council to co-operate with other Councils to meet the unmet City needs. If this approach is adopted the plan should include a clear timetable for action, co-ordinated with other Councils and the OGB.

“1.2 Are the likely environmental, social and economic effects of the plan adequately and accurately addressed in the Habitats Regulations Assessment and the Sustainability Appraisal (SA)? Does the SA test the plan against all reasonable alternatives in terms of the overall requirement for land for housing and employment...and its broad spatial distribution?”

10. The SA examines a number of “reasonable alternatives” and indicates that some issues are excluded from the alternatives, albeit that land, for example within the green belt, has subsequently been allocated for development. It does not examine the size of housing site chosen by the Council in respect of the definition of a “strategic site” (which is considered below). It does not deal with or examine issues arising from the City Council's unmet housing needs which is a reasonable alternative to the approach of simply meeting the District's own housing needs
11. In relation to land south of Cumnor, the SA indicates that the site was included in the first draft Local Plan but was subsequently deleted due to the comment that “it exceeds landscape capacity recommendations”. Appendix 12 of the SA notes, however, that it is one of the best performing sites in the Abingdon on Thames and Oxford Fringe.
12. Without wishing to stray into site specific issues to be dealt with in stage 2 of the Examination, the SA does not appear to follow a logical progression and

valid analysis which supports the manner in which the Council has sought to define strategic sites or to have examined a number of the sites identified as suitable for development.

“1.3 Is it appropriate for the plan to include only Strategic Policies and Site Allocations and for detailed planning policies and non-site strategic allocations to be devoted to a Part 2 Local Plan document? Is there a clear justification for this and does it accord with national policy?”

13. We consider that the limiting of the plan to strategic sites, and in particular the plan’s restrictive definition of strategic sites that excludes sites of less than 200 dwellings does not accord with national policy, particularly paragraphs 47 and 159 of the NPPF. No evidence has been produced identifying why a threshold of 200 dwellings was identified for ‘strategic’ allocations.

14. The district has an acute housing delivery problem and major developments on sites of less than 200 units would make a substantial contribution to supply. The district does not presently benefit from a five-year supply of deliverable homes and has not done so for some time. It is sites with an average capacity of less than 200 dwellings which have been able to be brought forward and to make up for the lack of land being delivered for housing. The sites larger than 200 units that are under construction are allocations from the present Local Plan that was adopted in 2006 underlining the time taken to deliver such developments. The smaller sites have ensured a continuous supply of housing which has not been delivered by the larger sites. Attached to this statement as **Appendix 1** is a schedule of approved development sites in the Vale of White Horse District confirming the vital contribution made by developments of less than 200 units.

15. The plan indicates that the smaller sites would be the subject of the Part 2 Local Plan; this would however involve undue and unnecessary delay in the release of such land which would adversely affect housing delivery.

16. The identification of smaller site allocations at this stage would ensure housing delivery and provide choice.

*“1.4 Is the plan compliant with:
 (a) the Local Development Scheme?”*

(b) the Statement of Community Involvement?

(c) the 2004 Act and the 2012 Regulations?"

17. The Local Development Scheme identifies that a partial review of the Local Plan Part 1 will be completed in December 2017. This timeframe goes beyond the 12-18 months from the identified at the time the plan was consulted upon prior to submission for examination (November 2014). This adoption is also beyond the 'two years from adoption' timeframe identified for review of the Cherwell Local Plan that was adopted in July 2015.

APPENDIX 1

Dwellings permitted on sites more than 9 units in Vale of White Horse District as recorded in Vale of White Horse Local Plan 2031 Part 1, Topic Paper 4 Housing.

Sites more than 200 units shaded in pink, those less than 200 units shown green.

Type	Site	Homes	Ringfence Area	Parish area
Completed	St Marys School, Newbury St	56	SV	Wantage
	Former bus depot site, Grove St & Limborough Rd	30	SV	Wantage
	Champion House, 12 Wootton Rd	24	RoD	Abingdon
	Amey Plc, Appleford Rd	15	RoD	Sutton Courtenay
	Land opp Shepherds Hey & Southbourne, Bessels Way	14	RoD	Blewbury
	98-100 West Way, Botley	12	RoD	North Hinksey
	Ambulance Station, Ormond Rd	11	SV	Wantage
	Abbey House, Stirlings Rd	10	SV	Wantage
	St Johns Court, Oxford Ln	10	SV	Grove
	Land adj to police HQ, Colwell Drive	9	RoD	Abingdon
Manor Farm, Fernham	4	RoD	Fernham	

Under construction	Land at Didcot Road, Great Western Park	794	SV	Harwell
	Land to the South of Chilton Field	275	SV	Chilton
	Former Tree Nursery & Cricket Club & Jespers Hill, Park Rd	253	RoD	Great Faringdon
	Timbmet Ltd, Cumnor Hill	192	RoD	Cumnor
	Land off Lime Rd, Botley	136	RoD	North Hinksey
	Land south of Majors Rd, opp Shrivensham Hundred Business Park	120	RoD	Watchfield
	Land east of Chainhill Rd	85	SV	Wantage
	Nalder Estate & The Old Canal Building, Main St	71	RoD	East Challow
	The Old Gaol Leisure Centre	61	RoD	Abingdon
	Land South of Faringdon Rd, Southmoor	50	RoD	Kingston Bagpuize with Southmoor
	Land adj Coxwell House & Winslow House, Coxwell Rd	35	RoD	Great Faringdon
	Land between Station Rd & Townsend Rd	31	RoD	Shrivensham
	Land adj to Folly Park, Park Rd	28	RoD	Great Faringdon
	46 Newbury Street	23	SV	Wantage
Land adj 31 & 34 Simpsons Way	16	RoD	Kennington	

Full permission	Land at Stockham Farm, Denchworth Rd	200	SV	Grove
	Land East of Drayton Road	160	RoD	Abingdon
	Land adj NE & NW of Tilbury Ln, Botley	150	RoD	Cumnor; North Hinksey
	Cowan's Camp Depot, High St	100	RoD	Watchfield
	Land off Draycott Road	98	RoD	Kingston Bagpuize with Southmoor
	Land West of the A417	73	RoD	Stanford in the Vale
	Milton Road, Sutton Courtenay	65	RoD	Sutton Courtenay
	East of Highworth Rd	36	RoD	Shrivensham
	Land at Causeway Farm, The Causeway	31	RoD	Steventon
	Land East of A338, Crown Meadow, East Hanney	25	RoD	East Hanney

	Land West of Portway Villas, Reading Rd	21	RoD	East Hendred
	Broadwater, Manor Rd	18	SV	Wantage
	Land North of Priory Lane	18	RoD	Marcham
	Land off Walnut Trees Hill	18	RoD	Ashbury
	Land South of Alfreds Place	15	RoD	East Hanney
	Berkeley House, 20 Marcham Rd, Abingdon	14	RoD	Abingdon
	Challow Country Club, Woodhill Ln	14	RoD	East Challow
	Land off Rectory Farm Cl	13	RoD	West Hanney
	17 to 20 Millbrook Sq	11	SV	Grove
	66 Cumnor Hill, Oxford	11	RoD	Cumnor
	Faringdon Tennis Club, Southampton St	11	RoD	Great Faringdon
	33 West, St Helen	0	RoD	Abingdon

Resolution to grant full permission	Land South of Downsview Rd (Stockham Farm Phase 2)	90	SV	Grove; East Challow
	Land at Highworth Rd, Shrivenham	35	RoD	Shrivenham
	Land to rear of Station Rd, Uffington	31	RoD	Uffington
	Land to the rear of Saxon Gate, East Hanney	16	RoD	East Hanney

Outline permission	Land South of Park Rd	350	RoD	Great Faringdon
	Major Amey's Site	140	RoD	Sutton Courtenay
	Monks Farm, Phase 1, Land West of Old Station Rd	133	SV	Grove
	Land West of Witney Road and South of A420	108	RoD	Kingston Bagpuize with Southmoor
	Harwell Oxford Campus, Phase 1	107	SV	Harwell
	Land off Colton Rd, Shrivenham	68	RoD	Shrivenham
	Alder View, Land South of Grove Road, Harwell	65	SV	Harwell
	Land off Barnett Rd	50	RoD	Steventon
	King's Field, Sheepstead Rd, Marcham	43	RoD	Marcham
Chailey House, Bessels Way, Blewbury	30	RoD	Blewbury	

Resolution to grant outline permission	Land at Grove Air Field, Denchworth Rd	2500	SV	Grove
	Crab Hill, North East Wantage	1500	SV	Grove; Wantage; Lockinge
	Fernham Fields, Land East of Coxwell Rd	200	RoD	Great Coxwell
	Willow Farm, Packhorse Lane, Marcham	54	RoD	Marcham
	Land North of 92-112 Milton Rd	34	RoD	Sutton Courtenay
	Land West of Faringdon Rd, Cumnor	22	RoD	Cumnor
	Bow Farm Rd, Stanford in the Vale	20	RoD	Stanford in the Vale
	Land adj Drayton Rd, Milton	18	SV	Milton

	Sites over 200	Sites under 200	Total
Homes constructed	0	195	195
Homes under construction	1322	848	2170
Homes permitted	550	1646	2196
Homes resolved to permit	4200	320	4520
Total	6072	3009	