

Examination in Public Statement Stage 1 - Matters and Questions

In respect of:
Matter 3 - Spatial Strategy and Housing Supply Ring Fence
On behalf of:
The Gow Family



1.0 Introduction

- 1.1. McLoughlin Planning is instructed by The Gow Family (hereafter referred to as the respondents) to make written representations to the Vale of White Horse (VoWH) Local Plan Examination in respect of its land and development interests in the village of Appleton.
- 1.2. This document sets out the respondents' position in respect of the Stage 1 questions posed by the Inspector for Matter 3, Questions 3.1 and 3.4 only

Question 3.1 (a) Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based?

Positively Prepared

- 1.3. The respondents' concerns regarding the test of being positively prepared relate to the fact that the Plan is silent about the level of development to be secured in village locations. Whilst it clearly supports development in such villages, it does not assign a level of development to be achieved. This lack of detail is further undermined by the fact that Policy CP 4 accepts that the Part 2 housing figure of 1,000 dwelling could be further adjusted as and when sites come forward as planning application on unidentified/unallocated sites through the development management process. Therefore, in respect of green field green belt village sites, such as at Appleton, the Plan is not positively prepared.

Justified

- 1.4. The evidence base has assessed the suitability of the strategy and the distribution of housing. A number of scenarios were put forward as part of the Issues and Options stage, with the preferred being set out in the Preferred Options Consultation in 2009 (Core Document TOP02 section 3). These were followed by internal reviews within the Council due to the revised evidence base and the increased need for housing. This revised housing need and distribution has been subject to a number of public consultations since 2013 that have justified the need and locations of allocations.
- 1.5. Furthermore, development in the villages in the green belt is supported by the Green Belt Review, which accompanies the Plan. This document makes recommendations as to where and when releases should be made from the green belt to allow for village development sites.
- 1.6. Therefore, whilst Policy CP4 has much in the way of evidence to support the proposed distribution of housing across the district, the approach to allocating non-strategic sites through Part 2 means that Part 1 is not fully justified.



Effective

- 1.7. In order for the distribution strategy to be sound, it has to be effective and this means that allocations have to be deliverable. The respondents' concerns this respect is that the suggested green belt development sites put forward in the Green Belt Review are not deliverable at this point in time, given the reliance on the Part 2 Local Plan to allocate non-strategic development sites. Given that Policy CP4 sets a 1,000 unit target, which will decrease as and when unallocated sites are consented through the development management process, it remains to be seen as to how the Policy can be considered to be fully effective when green belt development sites may or may not be able to come forward.

Consistent with National Policy

- 1.8. In terms of the respondents' specific situation, Policy CP4 cannot be considered to be soundly based in its treatment of non-strategic allocations in green belt locations.

In particular: (a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3)...

- 1.9. The respondents' position is that the proposed distribution of housing set out in Policy CP4 does not reflect the settlement hierarchy in that it does not provide the necessary detail for the level of development to be directed to Local Plan Part 2 allocations in the three-sub areas.
- 1.10. As drafted, Policy CP4 clearly anticipates a 1,000 dwellings coming forward from Part 2 allocations. However, when read in accordance with footnote b, there is no disaggregation of the 1,000 dwelling housing figure amongst the three sub-areas or settlement types within those sub areas. A further issue is that the level of Part 2 allocations will be directly influenced by unallocated sites coming forward through the development management process during the interim period of the plan being examined, found sound, adopted and the Council establishing a credible 5-year housing land supply. These difficulties could mean that:
- Part 2 housing requirement is consumed by speculative sites with planning permission.
 - Part 2 housing requirement is met through speculative applications/consents on sites in market towns and larger villages in one sub-area.
- 1.11. Therefore, there is no mechanism in the Plan to support the delivery of housing in villages, especially with green belt sites. In addressing the respondents' concerns, experience elsewhere has shown that Local Plans can adopt an approach where all the sites are allocated for development (e.g. South Worcestershire Development



Plan) which is the respondents' preferred approach, or a Part 2 housing target is disaggregated to sub-areas within a plan (e.g. Wiltshire Core Strategy). As a minimum, it is recommended that the latter approach is adopted in the Plan.

- 1.12. Should either such approach be adopted, the respondents consider that there is sufficient material in the evidence base to support a housing target for Appleton as a "smaller village" or "larger village" to protect an element of housing supply. Appleton's position in the hierarchy has been based on the evidence base developed by the Council to support the Local Plan (Core Documents TOP02 and COM04). The purpose of the hierarchy is to consider all settlements within the District and identify the most sustainable locations for development. The assessment of the settlements, as part of a series of topics, has assisted the Council in defining a hierarchy of the most suitable locations for new development. The settlements have been classified on their facilities, characteristics and functional relationship with the surrounding area.
- 1.13. The respondents support the Plan's approach in that it looks to provide a settlement hierarchy for managing development. However, the respondents make the following comments.
- 1.14. In terms of the Abingdon on Thames sub area, the classification of Appleton as a Smaller Village is not justified, when assessed against the evidence base. The respondent's position is that the village should be seen as a large village in that it has more in common with a 'small' larger village. A good example of this is comparing Appleton with Uffington (in the Western Vale Area). This village scores 14 in the Councils Village Facilities Study and this makes it the lowest scoring Larger Village in the District.
- 1.15. When evaluating the two settlements, the key differences is that
 - Uffington has local employment
 - Uffington has better open space provision.
- 1.16. Critically, Uffington is not a larger settlement. An analysis of the 2011 Census data shows that Appleton is a larger Parish, with a population of 915, when compared against 783 for Uffington. In addition, the village has a Doctor's Surgery whereas Uffington does not. This shows that Appleton performs an important service centre function beyond its immediate environs. New development in the village will be controlled by the green belt.

...and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling,



1.17. In conjunction with other representations, the respondents are of the view that there are clear issues with Policy CP4 in respect of the delivery of non-strategic greenfield green belt housing sites. Namely these concerns manifest themselves the form of the Plan proposing a strategy which may not require such sites to be released for development, because of purely external events through the development management process.

1.18. This weakness means that the Plan may not be able to make the fullest possible use of a proposed development site at Appleton in accordance with paragraph 17 of the Framework. If the Inspector were to propose modifications to make the plan sound which would see the allocation of non-strategic development sites. The respondents site at Appleton has the benefits of being within walking distance of:

- Primary School
- Doctors Surgery
- Village Hall
- Play area
- Pub
- Village Shop with Post Office service

1.19. Also with the already presence of superfast broadband any development in this village will mean that residents will not have to automatically travel outside of the village for access to basic services and facilities and therefore necessarily rely on the private car. The village also benefits from being on the Stagecoach 66 bus service route, it serves the village at limited times of day, it is a well-used and popular service running between Swindon and Oxford.

...and focus significant development in locations which are or can be made sustainable?

1.20. It is not considered by the respondents that the level of development being proposed at the Appleton site is "significant". However, up to 60 to 70 units will have benefits for the village in supporting existing services and facilities, which is in accordance with other Framework policy objectives (notably paragraph 55). Analysis of the demographic structure of the village shows that there is an ageing population and there is a lack of available housing to buy or rent in the affordable sectors, a point underlined by the SHMA's findings for Vale in general. With more than 50% of the primary school children from outside the village, development will also bring the



benefit of additional children to the village, supporting the school and reducing the reliance on children from outside of the catchment to maintain it, as well as reducing the parking and traffic congestion which occurs around the start and end of the school day. As set out above, the village already has a basic range of services and facilities, qualifying it as a location to support new development, endorsed in Town and Village Facilities Study, February 2014 update (Core Document COM4).

Question 3.4

- 1.21. The respondents support the concept of ring fencing of housing supply in the District in certain circumstances. Whilst they are neutral on the levels of development proposed for the Science Vale area, the presence of a ring fence does show how the Plan can meet the tests in both the Framework and PPG in terms of how, where, what and when for when new development will be provided.
- 1.22. Given the expressed concerns with Policy CP4, it is considered that such a ring fence is equally valid for green belt village sites because, there is no framework currently to prevent all the supply from being accounted for by other locations outside of the green belt. This will be to the detriment of villages in the green belt, such as at Appleton.
- 1.23. Ministerial forward of NPPF states "Our lives, and the places in which we live them, can be better, but they will certainly be worse if things stagnate."
- 1.24. Stagnation or the failure in the past to plan positively to allow development beyond the house extension or only a small number of high end properties in small rural villages both within (such as Appleton) and outside the Green Belt means that;
 - the vitality of rural communities promoted in Para 28, 55 and 70 are threatened,
 - people living in rural communities are not given a real choice about how they travel as promoted in Para 29,
 - young and old people have been forced to move away because of the lack of provision of affordable housing as stated in Para 54
- 1.25. and as such will probably mean the decline of the very services that have made these communities sustainable in the past as they will not be able to remain financially viable and self supporting.

Adequately explained in terms of its practical operation?

- 1.26. The Green Belt review identifies a series of proposed releases from the green belt. Policy CP4 would be modified to include a strategic target for green belt non-strategic sites to come forward through Local Plan Part 2 process (if no modifications are proposed).



Justified?

- 1.27. The Green Belt Review, SHLAA, Settlement Hierarchy Topic Paper and the SHMA support housing across the District and identify a series of development sites. It is considered that the evidence base is robust enough to justify the approach adopted.

Effective

- 1.28. If the Inspector support a two part Local Plan, the ring-fencing of housing numbers in Part 1 for Part 2 sites in the green belt is effective and deliverable as such sites can only be released through the development plan process.

In accordance with national policy?

- 1.29. Yes – it accords with the PPG guidance on Local Plans as set out above.



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