

**VALE OF WHITE HORSE DISTRICT COUNCIL
LOCAL PLAN 2031: PART 1**

EXAMINATION IN PUBLIC STAGE 2

MATTER 10

**REPRESENTATIONS ON BEHALF
OF
MRS A JONES**



January 2016

1.0 INTRODUCTION

- 1.1 This statement is made in response to the Vale of White Horse District Council's Local Plan 2031 ("The Plan") Stage 2 Examination in Public ("EiP") on behalf of the owner of the northern part of "Land West of Stanford in the Vale".
- 1.2 In his Matters and Questions for the Stage 2 hearings, under matter 10 the Inspector asks:
- "10.1 Are the Strategic Housing Allocations listed in policy CP20 soundly based and deliverable?"*
- (a) South of Park Road, Faringdon (site 17)*
(b) South-West of Faringdon (site 20)
(c) East of Coxwell Road, Faringdon (site 18)
(d) South of Faringdon (site 19)
(e) North of Shrivenham (site 21)
(f) West of Stanford-in-the-Vale (site 16)"
- 1.3 This Statement sets out how the allocation of West of Stanford-in-the-Vale (site 16) in the Plan is indeed soundly based and deliverable.
- 1.4 The representation supports the Council's decision to allocate land West of Stanford in the Vale in its Local Plan 2031. However, our client questions the reduced allocation on the site which makes the policy neither **justified** or **effective**; nor **consistent with national policy**.
- 1.5 Our client owns the northern part of the site and, following extensive liaison with the other landowners, we are working to ensure that the whole site is deliverable as one cohesive development.

2.0 VALE OF WHITE HORSE LOCAL PLAN 2031: PART 1 - STRATEGIC SITES AND POLICIES

- 2.1 Preparation of the Council's new Local Plan first started in November 2007 and has been through a number of iterations since. The Council published its Local Plan 2031: Part 1 – Strategic Sites and Policies in February 2013 with housing targets based on those in the South East Plan (13,294 new homes over the plan period). However, the South East Plan was revoked in March 2013 meaning that it no longer has any statutory weight in planning terms.
- 2.2 Since then, an Oxfordshire Strategic Housing Market Assessment (SHMA) has been produced jointly between all the Oxfordshire local planning authorities. This assessed housing need in all of the Oxfordshire housing market areas. The results showed a higher housing need for the Vale of White Horse than that being provided for in the February 2013 plan. As a result, housing targets for the Council were increased. This was reflected in a further Strategic Sites and Policies 'Housing Delivery Update' version of the plan published for consultation in February 2014. This version had a higher target of 20,560 new homes, which matched the requirement for the Vale in the SHMA. Land West of Stanford in the Vale was allocated in the plan for 290 dwellings.

2.3 Following the February 2014 Housing Delivery Update consultation, a number of amendments have been made to the plan. These are now being consulted on prior to its submission to the Secretary of State. The site is still allocated for development but for a lower number of 200 dwellings.

3.0 Suitability of Land West of Stanford in the Vale for Allocation.

3.1 Page 36 of the plan sets out the 'Settlement Hierarchy' for the district and designates Stanford in the Vale as a larger village with employment, services and facilities. Page 33 of the plan explains the sustainable strategy for the Vale. Part of the strategy is to allocate strategic housing growth at the larger villages to help maintain their vibrant communities. The allocation of Land West of Stanford in the Vale is consistent with this strategy.

3.2 A number of assessments have been carried out on the site by the Council and our client. They all show the suitability and achievability of the site for development. The key points from the assessments are summarised below:

- **Landscape Capacity Study** – The Phase 1 Landscape Study of the site carried out by the Council. The study recommends the site for allocation in landscape terms and concludes that *'The site relates well to the existing settlement pattern and can be contained with a limited impact on the wider landscape through appropriate landscape treatment.'*
- **Access and Traffic** – The site can be accessed from an existing gated access off Faringdon Road to my client's land as shown in the highways report.
- **Ecology** – Our client commissioned an Ecological Assessment of their site. The assessment found no overriding ecological issues which could prevent development on the site. Indeed it states there are ecological opportunities through habitat creation and enhancements for fauna on the site.
- **Flood Risk** – The whole site is Flood Zone 1 meaning it has the lowest risk of flooding.
- **Pollution** – A geo-environmental appraisal has also been carried out on the northern site for our client. It concludes that there should be no significant geo-environmental issues on the site that would prevent it from being developed.

3.3 The Council's Strategic Housing Land Availability Assessment (SHLAA) assessed the site under reference STAN08. In conclusion it stated that:

'The site is suitable in principle. The site is not isolated from the existing settlement as it is adjacent to a recently permitted development and an employment site as well as close to a petrol station and public house (currently being rebuilt after a fire).'

It also concluded that the site is '*Achievable*' and '*Developable*'.

3.4 The Council's Sustainability Appraisal (SA) found minor positive effects against SA objectives, which sought to provide suitable homes (including affordable housing),

allocate development on sites that have good access to services and reduce the need to travel and promote sustainable travel. There were also neutral effects on SA objectives, which sought to improve health and well-being, support a strong and sustainable economy and protect cultural heritage, townscape and landscape.

- 3.5 Since this initial earlier work was carried out further detailed studies have been completed in summer 2015 to demonstrate that 100 dwellings could be delivered on the northern part of the allocated site.
- 3.6 The following studies have been carried out and below is a summary of each one. All four studies are appended to this statement;

Transport & Highways – The Transport Review has looked at the delivery of the 200 dwellings allocated in the draft plan. An access can be achieved for the allocation that meets the requirements set out in Manual for Streets without encroaching on third party land. Furthermore, the access can be achieved through the site of an existing gate on the northern portion of the allocation. An assessment has been carried out as to the impact on the capacity of the highway and it has been confirmed that there will not be a material impact on highway safety or highway capacity as a result of the development of the site.

Flood Risk – The whole of the allocated site lies in flood zone 1 and therefore at low risk of flooding and acceptable for residential development. Surface water drainage will be designed using SUDS techniques to ensure there is no increased risk of flooding elsewhere as a result of the development.

Ecology – A range of protected species surveys have been carried out on the northern site. No bat roosts have been identified on the site although foraging of bats has been noted. There are no signs of badger or dormouse activity. No reptiles or amphibians were discovered under the artificial refugia that were laid over a period in August to September 2015. There are no protected species on the site that prevent the development of the site.

Landscaping and Masterplanning – The landscaping assessment has assessed the surrounding area including the views in and out of the site. It advises that “Due to the screening effect of the land form, tree cover and hedgerows within the vicinity of the site, the visual influence of the site is limited. In general, only the localised area around the site is likely to be influenced by development of the site, specifically views from the village edge and a ROW to the north.” The assessment recommends that “existing trees and hedgerows are retained and associated open space buffers protected adjacent to them.”

The Masterplanning exercise that has been carried out has demonstrated that on a site of 4.85ha which is just under 50% of the total allocation, 60% would be developable with the remainder being circulation and open space, just over 100 dwellings could be delivered on the site. This is based on an assessment of the density of the surrounding development in the village and taking a net density of 35 dwellings per hectare.

The masterplan shows how the access can be achieved off Faringdon Road, how the blocks of development, open space and circulation could be laid out. It also shows how the site could be developed as part of the larger allocation with links through to the south.

4.0 Level of Housing Allocated on the Site.

4.1 In the Local Plan 2031 Housing Delivery Update February 2014, the site was allocated for 290 homes. Without explanation, in the submitted version of the Plan this has been reduced to 200 dwellings. Our client queries this reduction in the size of the allocation.

4.2 The Housing Topic Paper at paragraph 5.48 explains that a minimum development density of 30 dwellings per hectare (dph) is the Council's preferred density requirement unless specific local circumstances indicate a lower density is appropriate. This is justified by referring to advice in the Council's draft Design Guide which states that:

'it is normally in relatively exceptional circumstances that lower than 30 dph would be necessary'.

4.3 Our client agrees with this statement and are sympathetic to the view that as the site lies on the edge of Stanford in the Vale, a slightly lower density may be appropriate. The site is 11.62 ha and developing it for the 290 dwellings as originally intended, would be the equivalent of a very reasonable 25 dph.

4.4 If the allocation is reduced to 200 dwellings the development would be delivering a wholly incongruous density of 17 dph or nearly half of the proposed minimum development density required in the plan. This would result in the waste of valuable greenfield land and means the policy is neither **justified** nor **effective**.

4.5 Moreover, the policy would not be **consistent with national policy**. Paragraph 7 of The National Planning Policy Framework ("the Framework") states that there are three dimensions to sustainable development: economic, social and environmental. These give rise to the need for the planning system to perform a number of roles. Under 'environmental' it requires local authorities to '*use natural resources prudently*'. Allocating the site for such a low density is not consistent with this requirement.

5.0 Summary and Conclusion.

5.1 Our client fully supports the allocation of Land West of Stanford in the Vale in the Council's Publication Version of its Local Plan 2031 Part 1: Strategic Sites and Policies and believes that the Plan has been **positively prepared and is sound**.

5.2 The Council's own evidence base as well as studies commissioned by our client demonstrate the suitability of the northern site for development and that the site can accommodate 100 dwellings.

5.3 Our client can assure the Council that the northern site is available and deliverable and there are no factors that would prevent it being delivered such as flood risk, access, or protected species on site.

5.4 Our client **questions** however the Council's unexplained decision to reduce the proposed allocation from 290 to 200 homes. With the reduced density, the resultant density would be close to half of the minimum density required in the Plan (17 dph compared to 30 dph). The lower density is not **justified** and the waste of valuable greenfield land through a lower density would not be **effective**. The policy would also

not be **consistent with national policy**, which requires the prudent use of natural resources.