

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Messrs	Mr
First Name		Jon
Last Name	Cumber & Duffield	Alsop
Job Title (where relevant)		Director
Organisation representing (where relevant)		Savills
Address Line 1		Wytham Court
Address Line 2		11 West Way
Address Line 3		Botley
Postal Town		Oxford
Post Code		OX2 0QL
Telephone Number		01865 269056
Email Address		jon.alsop@savills.com

Part B – Please use a separate sheet for each representation

Name or organisation:

Savills – on behalf of W Cumber & Son (Theale) Ltd. & Mr John Duffield

3. To which part of the Local Plan does this representation relate?

Core Policy 4A & Appendix A pages 21 to 23 - Marcham

4. Do you consider the Local Plan is:

4. (1) Legally compliant	Yes	No
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4. (2) Sound	Yes	No
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4. (3) Compiles with the Duty to Cooperate	Yes	No
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5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

Savills is instructed by W Cumber & Son (Theale) Limited and Mr John Duffield, who own the land to the north east of Marcham, previously identified as Site 25 in Appendix A of the Second Preferred Options Local Plan 2031 Part 2. The site was also assessed in the March 2017 draft HELAA.

In our response to the current consultation, we would comment that the Part 2 Plan is not fully justified, in that there is a lack of robust and credible proportionate evidence to support the omission of the previously proposed allocation of land to the north east of Marcham.

We submitted representations, in May this year, in response to the preferred options consultation on the Local Plan Part 2, specifically in support of the Plan's allocation of land to the north east of Marcham for 400 dwellings. The site is available, and VoWH officers have been very supportive of its development in principle.

Since that time we have progressed dialogue with VoWH and County Council officers, in particular to seek to understand and address the objections raised in May by the County Council as local highway authority, in regard to traffic generation and consequent potential adverse air quality impacts upon Marcham and its Air Quality Management Area (AQMA).

In order to consider and seek to address those concerns, and with the support of specialist consultants, we have been advancing our own appraisals of traffic generation and air quality impacts, in liaison with officers, and indeed of options for education provision. This work is, however, yet to be completed.

We were extremely disappointed by the removal of the north east Marcham site from Part 2 of the Plan, and the statement at paragraph 34 of the Scrutiny Committee report, in September 2017, that this was '*due to the proximity to an Air Quality Management Area*'.

At this stage the District Council and County Council lack detailed evidence to support this, and

indeed Stage 2 of OCC's own 'strategic study' remains outstanding.

The Stage 1 'Evaluation of Transport Impacts', that forms part of the evidence base for the Part 2 Plan, suggests that the highway authority originally modelled 1,000 units at Marcham and the initial results don't appear to show a material impact upon the A415 corridor. Page 50 of Stage 1 ETI relates to Cluster 3, of which Marcham is part, and if anything appears to show a positive impact upon the critical AQMA corridor. Clearly there is further work to do, but from our understanding, the County's own findings do not immediately point to additional development at Marcham being ruled out, and their own objections in May referred to the 'potential' impact on air quality.

We would also question how other sites in the vicinity being retained in the plan, such as Dalton Barracks, can be deemed not to contribute to the air quality management issue. The relationship with the impacts of HGV traffic passing through the village, and their effects on air quality, also needs to be weighed.

The site is in a sustainable location, has no planning designations or environmental constraints which would preclude development and the two landowners are working together to bring the site forward for development. The site is under a kilometre away from the centre of the village where there are a range of services, including a shop, post office, community facilities, a primary school and access to public transport.

Land directly adjacent to the south west has planning permission for 61 dwellings which was granted in April 2016, and King's Field to the south west is under construction for 43 units. Planning permission was also granted in August 2017 for the erection of 47 dwellings, to the north of King's Field, and west of the site. Existing residential areas, including Anson Close and Hydes Copse, also lie to the west of the site.

Access can be provided via Cow Lane, off Sheepstead Road as well as directly off Marcham Road.

The site therefore relates well to the existing and future built up edge of Marcham and it will be possible to develop a masterplan for residential development that integrates well with the village.

We would therefore request that the site to the north east of Marcham is retained in the Part 2 plan, at least until robust evidence can be offered that would support or dispel the highway authority's assertion that development will have an unacceptable impact on the AQMA – and which would assist in helping an Inspector to find the Plan as sound.

Marcham is a sustainable location to assist in delivering housing, and the land to the north east should not, presently, be omitted in the absence of sufficient evidence to suggest that its allocation is unsound. Whilst the allocation of a full 400 units may not be appropriate, the opportunity to deliver some housing at the site should not be discounted in our view.

In light of this, and the need to complete our appraisals, we would wish to reserve the opportunity to participate in the oral part of the examination and explore these issues with an Inspector.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As set out in our response to Q5, Marcham is a sustainable location to assist in delivering housing, and the land to the north east should not, presently, be omitted in the absence of sufficient evidence to suggest that its allocation is unsound.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

~~**No**~~, I do not wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As set out in our response to Q5, in the light of the lack of robust and credible proportionate evidence to support the omission of the previously proposed allocation of land to the north east of Marcham, and the need to complete our appraisals, we would wish to reserve the opportunity to participate in the oral part of the examination and to explore these issues further with an Inspector.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: **21st November 2017**

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan **X**

I would like to be added to the database to receive general planning updates **X**

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