

JPPC ref: hv/5624HE

Planning Policy Team
Vale of White Horse District Council
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15 December 2014

Via email to:
planning.policy@whitehorsedc.gov.uk

Dear Sirs

**Local Plan 2031 Part 1: Strategic Sites and Policies
Consultation Publication Version November 2014
Comments regarding East Hendred**

In relation to the above proposed allocation I write on behalf of landowner Hendred Estate, in respect of issues in East Hendred. I have also sent another letter on the Estate's behalf in relation to other land- this has a different JPPC reference.

General Support for Local Plan

We agree with the Council that there is a need to identify a number of larger development sites in order to ensure that sufficient housing is built to meet the housing needs of the District as identified in the latest available evidence which is the SHMA (February 2014). This would appear to meet the requirement in the NPPF (para 14) for Local Plans to meet objectively assessed needs.

Any allocation will need to be located in a sustainable location and have good sustainable development credentials.

The Council is proposing larger scale development in the Science Vale area and to ring fence this.

continued

Objection to policy-

Reference: Core Policy 15 Local Plan Part 1 Strategic Sites and Policies: Spatial Strategy for South East Vale Sub-Area

This is an objection on soundness

East Hendred is located within this Science Vale area, it has not however been allocated any development in this proposed plan part 1, notwithstanding its established function as a larger village and its likely ability to assimilate growth. It has however been named as being suitable for some of the allocation of 56 dwellings to be allocated as part of the Part 2 allocations.

These 56 dwellings are potentially to be spread across 11 large and smaller villages in South East Vale Area and Wantage/Grove. If spread evenly this would be relatively few dwellings per settlement.

We are of the view that East Hendred may present an opportunity for significant development, which would have the potential to 'take' all of the Part 2 allocation of 56 dwellings. Other villages may also have suitable sites for significant new development not at the strategic level.

Allocating a proportion of housing to the 11 listed 'larger and smaller villages and 2 towns' goes some way to spreading development in the area. However the large number of settlements means the benefits of the scale of allocation envisaged by Part 2 development will be very thinly spread and thus not result in wider enhancements to those settlements in the South East area.

Such a fixed low number of dwellings to be allocated also limits choice (especially in the settlements where strategic size development is not proposed to take place) and the NPPF is clear that although decisions need to be made using the principles of sustainable development this limited approach does not reflect local demand for housing in such locations. There is understood to be demand for housing more widely across the district including in existing sustainable locations like East Hendred.

This option for Local Plan Part 2 may be better considered if the range of settlements were to be reconsidered to exclude Grove, Wantage and Harwell Campus and Milton Heights where strategic allocations are taking place.

But more importantly it is numbers of units that should be reconsidered and raised significantly.

A higher number has been apportioned to future windfall supply, however due to the policy of constraint over the past two plans which has allowed only infilling there are now only very restricted opportunities for infilling within villages. Past trends for infilling will not continue as it ignores the limited nature of land availability within existing built confines.

Raising the number of homes to be allocated in Part 2 would spread development pressure across the district and reduce risk of market saturation in any one area. The district has a good history of housing delivery through smaller developments therefore a more permissive approach is likely to enhance delivery.

Also should any of the larger allocations be slowed or become undevelopable a steady stream of housing would continue to be made as smaller developments are available to more developers and are easier to progress. Relying only on very large allocations for the South East Vale could be said to be putting all one's eggs in one basket. Because failure to deliver the homes allocated could risk deliverability of the plan we consider that the plan is unsound due to not being effective, and suggest a correction to the plan at the end of this letter to make it sound.

Allocating in Part 1 for more housing to be provided in Part 2 for the larger and smaller villages will allow communities to avoid stagnation. If new dwellings are not created decreasing household sizes means reducing populations in areas where no 'growth' is proposed. Managed expansion of larger and smaller villages also gives greater opportunities for provision of new services and infrastructure allowing such settlements to be more sustainable in their own right (NPPF, para 17). This is particularly relevant with communities entitled to a meaningful proportion of the CIL from a development in their area.

Previously dispersed development has been undesirable as it has been unable to deliver infrastructure as effectively as a single large site. The introduction of CIL gives greater flexibility for the pooling and spending of contributions secured from developments meaning dispersed development could support large infrastructure projects; thus contributing to sustainable development across the district.

Allocating only say 5 dwellings¹ for East Hendred will not account for growth at all given the 20 year period of the plan and likely diminished household sizes over that time.

Well planned development will allow growth across the district, and allow services and facilities to thrive. Sustainable villages such as East Hendred are well placed to contribute to meeting housing need for the area, and would be enhanced through development. However the tightly planned form of East Hendred and the other villages means there are limited opportunities for infill development (as currently defined). Allocation of a reasonably sized site in the village is likely to be the most effective means to secure new housing (including affordable).

Local Plans are to be visionary and we consider that the changed to the strategy for development that we identify falls in that category whilst also meeting obvious needs.

Sustainability and location

East Hendred is well located to take advantage of the Local Plan's vision of sustainable economic development that is identified by Science Vale and significant employment potential of Harwell Campus and Milton Park. People living here would not need to own a car to access vital day to day services, including employment, schools and shops and others. The village already is a sustainable location and is very well positioned to be considered sustainable in future transport terms, given the promotion of Science Vale.

¹ As an eleventh of 56- for hypothetical purposes here

Community

The level of development envisaged by us across these larger/smaller villages would not overwhelm East Hendred and would allow the village to retain its existing character and social cohesiveness. Provision of this level of development would provide support for village services such as shops and pubs to enable them to remain viable and other facilities such as the school and community halls can be incrementally added to- via appropriate infrastructure contributions- ensuring that they could cope. It would ensure the promotion of healthy communities and integration with the existing village(s). Each settlement would remain identifiably a village even if this extra amount of housing were to be allocated.

Flexibility

Paragraph 157 of the NPPF advises that Local Plans should indicate broad locations for development and also allocate sites to promote development and flexible use of land. In order to provide the necessary flexibility any allocation for Part 2 should reflect an allocation of about 200 homes across the larger and smaller villages in our view in order that the Part 2 plan can be flexible and respond appropriately to local context and constraints and help to deliver the homes needed but without jeopardising the vision for larger strategic allocations. The two may co-exist. We note the much higher level of Part 2 allocations suggested for the Abingdon/Oxford Fringe Sub-Area which does not quite 'fit' with the proposal for the South East area.

Summary

Thus in terms of the three prongs of sustainable development, a larger allocation of this site would be appropriate in economic, environmental and social terms.

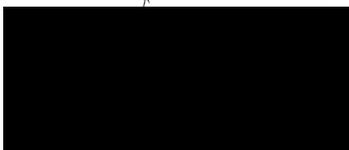
Suggested course of action to address this objection

To increase the number of dwellings allocated for the larger and smaller villages (excluding Harwell Campus and Milton Heights²) from 56 to 200. How this would read in the local plan policy text is highlighted overleaf.

Or the 56 should be treated and specified to be a minimum and not a target/maximum.

If you have any questions about this submission please do not hesitate to contact me.

Yours faithfully



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Associate
Email: [Redacted]

² Because both have strategic allocations

5 Sub-Area Strategies

South East Vale

Core Policy 15: Spatial Strategy for South East Vale Sub-Area

Our over-arching priority for this sub-area is to secure the aligned delivery of housing and employment growth together with the infrastructure required to achieve sustainable development.

Development in the South East Vale Area should be in accordance with the Settlement Hierarchy set out in **Core Policy 3**:

South East Vale Sub-Area:

Market Town: Wantage

Local Service Centre: Grove

Larger Villages: Blewbury, East Hendred, Harwell, Harwell Campus* and Milton

Smaller Villages: Ardington, Chilton, Milton Heights**, Rowstock, Upton and West Hendred

*Harwell Campus has facilities and services equivalent to a Larger Village

**Milton Heights has facilities and services within a short walk that are equivalent to those offered by a Larger Village

Housing Delivery

At least 12,450 new homes will be delivered in the plan period between 2011 and 2031. 10,320 dwellings will be delivered through strategic allocations. 220 dwellings remain to be identified and will be allocated through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management Process. The contribution of all sources of housing for this sub-area are shown by the following table:

Category	
Housing requirement for the full plan period (Apr 2011 to Mar 2031)	
Housing Completions (Apr 2011 to Mar 2015)	Known Completions (Apr 2011 to Mar 2014) Estimated Completions (Apr 2014 to Mar 2015)
Housing Supply (Apr 2015 to Mar 2031)	Known Commitments Local Plan 2031 Part 1 allocations Local Plan 2031 Part 2 allocations Windfalls

a This target addresses needs arising in the Vale of White Horse. If or when required, needs arising in the Housing Market Area, will be addressed by timely and effective cooperative working in accordance with Core Policy 2.

b The Local Plan Part 2 allocation will be reduced where dwellings are allocated in Neighbourhood Development Plans or come forward through the Development Management Process.

Housing Supply Ring-Fence

11,850 new homes are 'ring-fenced' for the purposes of the assessment of housing land supply within this sub-area in accordance with Core Policy 15. Development will be supported at strategic site allocations through the masterplanning process involving the community, local planning authorities, developers and other stakeholders where they meet the requirements set out within the Development Site Templates shown by Appendix A and in accordance with the Development Plan taken as a whole. Design, implementation and detail will also be set out in the Science Vale Local Plan. The following table shows how the level of housing required for the sub-area through the strategic development sites will be distributed:

Delete '56' replace with '200'

Or (less preferably)

Delete 'up to' and replace with 'at least'