



Vale of White Horse Local Plan Part One:  
Strategic Sites and Policies  
Publication Stage Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

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.*

Title	C/O Agent
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address (where relevant)	

### 2. Agent's Details (if applicable)

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Charlotte
Goodrum
Planner
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London
EC4A 2DW
02030773412
<a href="mailto:cgoodrum@danielwatney.co.uk">cgoodrum@danielwatney.co.uk</a>

## Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph  Policy  Proposals Map

### 4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(continue on a separate sheet/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 test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

These representations to the November 2014 draft of the Vale of White Horse (VoWH) 2031 Local Plan, Part 1 have been prepared on behalf of Bernard Green and Giles and Dominic Turnbull who own the land known as Pond Cottages, OX11, edged red on the accompanying site location plan.

## **Introduction**

It is the intention of the landowners to bring forward land at Pond Cottages to deliver up to 10 new homes for VoWH. It is recognised that the site is not of a size which could deliver over 200 new homes and it is not therefore the intention of these representations to put the site forward as a strategic housing allocation to be included in Part 1 of the new VoWH Local Plan.

Instead, these representations highlight the concerns the landowners have in respect of the application of Core Policy 5 of the new Local Plan regarding the Housing Supply Ring-Fence, and the lack of clarification regarding the definition of Harwell Campus within Core Policy 3 Settlement Hierarchy. We believe that without clarification, the policies could prevent a small residential development site being brought forward for new housing in a sustainable and coherent part of the VoWH which has recently accommodated significant new development and has inherently created a Larger Settlement.

## **Housing Supply Ring-Fence**

Core Policy 5 outlines the Council's proposed 'ring-fence' approach to housing supply to help ensure that jobs, homes and infrastructure are provided together. The central planning justification for the ring-fence is that it supports the delivery of the Local Plan Spatial Strategy focus on development in Science Vale, which includes Harwell Campus. The ringfence seeks to concentrate housing growth and infrastructure investment in this location and aims to reinforce the commitment to the Spatial Strategy.

We consider that Core Policy 5 is a positive new addition to the Local Plan and directs growth to the most sustainable locations for development, alongside jobs and infrastructure improvement. At present we do not however consider the Plan to be sound as it is not effective. It would benefit from greater clarification as to how this housing delivery sits alongside the housing delivery and strategic allocations within Core Policy 4. For example, Harwell Campus which falls within the ring-fence is described as a Larger Village, within which Core Policy 3 only allows for unallocated development limited to providing for local needs and to support employment, services and facilities within local communities. Conversely, the ring fence policies encourages housing development to support jobs and infrastructure growth; it is not clear how the objectives of the two policies work together to deliver housing and other new development. The inclusion of allocations within the ring fenced areas would provide a more accurate assessment of likely housing delivery and trajectory over the plan period, and ensure development to the most sustainable locations is secured.

It should also be made clear that housing delivery within the ring-fence areas benefits from that same level of support as that afforded to housing development within the settlement boundaries; the ring-fence policy could arguably form part of Core Policy 4 as the delivery of 11,850 homes comprises a significant part of the Vale's overall housing supply.

## **Settlement Boundaries**

Notwithstanding our recommendation above, we note that several of the areas, mostly notably Harwell Campus, still do not benefit from a settlement boundary, although are now covered by the ring-fence policy. The area surrounding Harwell Campus contains two strategic site allocations which will deliver a total of 1,400 dwellings over the plan period; 850 on the site to the east of Harwell Campus, and 550 on the site to the North West of Harwell Campus (Figure 1 below refers). This will result in the delivery of 1,400 dwellings by 2031, with a further 2000 proposed beyond this date, on sites that are not situated within a designated settlement boundary.

We are concerned that without the clarification that the ring-fence areas benefit from the same level of policy support as the market towns, local services centres and larger villages, in the absence of a defined settlement boundary this could give rise to ambiguities as to whether development is supportable, particularly to the edge of developed areas. This would make the Plan unsound as it is not effective.

We believe that establishing Harwell Campus with a settlement boundary would result in a more clearly defined settlement, and would ensure that growth within the area is sustainable. The settlement would sensibly and coherently include both strategic site allocations and the Pond Cottages site, as outlined in the attachment.

### **Chilton – Small Village**

Chilton is allocated through the new Local Plan as a 'smaller village' where development is considered to be less suitable. However, whilst we consider land at Pond Cottages is more likely to be included in a new settlement boundary for Harwell Oxford Campus, a new settlement boundary for Chilton should also be drawn to inform the new Local Plan 2031.

### **Harwell Oxford Campus – Larger Village**

The Local Plan 2031 protects and enhances the services and facilities provided by Market Towns, Local Service Centres and Larger Villages, ensuring that any new facilities, homes and jobs are focused on these settlements.

As previously mentioned, Core Policy 3 of the Local Plan designates Harwell Campus as a 'Larger Village' within the Settlement Hierarchy. However, this designation is caveated, which states that Harwell Campus has the facilities and services equivalent to a Larger Village.

This caveat may be solely explanatory; however we consider it to introduce an unnecessary level of ambiguity. It could be inferred that Harwell Campus, whilst having the facilities and services equivalent to a Larger Village, is not considered appropriate for the scale of development supportable at other Larger Villages.

Removing the caveat would result in a policy which is clear and practical, ensuring that growth is promoted in all suitable settlements including Harwell Campus.

**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?

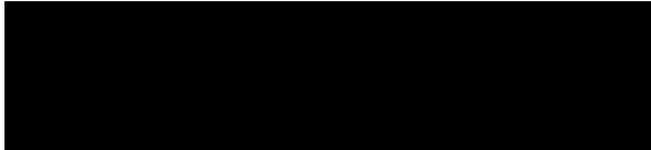
No, I do not wish to participate at the oral examination

Yes, I 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:

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

Signature:



Date:

19/12/14

## Part B – Please use a separate sheet for each representation

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Name or Organisation :

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

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<b>4. Do you consider the Local Plan is :</b>				
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## Reliance on Larger Sites

As stated by Core Policy 4 of the Local Plan, the housing target for the Vale of White Horse District is for at least 20,560 homes to be delivered in the plan period between 2011 and 2031. The housing supply from April 2015 to March 2031 will comprise the following:

- 3,169 known commitments
- 13,960 dwellings delivered through Local Plan Part 1 Allocations
- Up to 1000 Local Plan Part 2 Allocations
- 900 windfalls.

Whilst up to 1,900 homes are identified as contributing to the VoWH housing target through the allocation of smaller development sites comprising less than 200 homes, none of these currently contribute to the 5 year Housing Supply as they are to be identified in Part 2 of the Local Plan which is not expected to be published in draft form until 2015/16. This means that, with the exception of very limited sites located within established settlement boundaries, all new homes to be delivered over the next 5 years are to comprise larger sites of over 200 units.

Whilst we appreciate that most of the new housing in the VoWH delivered over the Plan period will be on larger sites, we consider that to ensure the deliverability of the Plan as per NPPF para. 182, these should be supplemented with smaller sized sites which can address any shortfall. This would ensure the Plan is effective and therefore sound.

Whilst limited sites are envisaged to deliver some housing in conjunction with Part 2 of the Local Plan, these will not come forward until post 2016 and thus we strongly recommend that a selection of smaller sites that accord with the NPPF presumption in favour of sustainable development are included in Part 1 of the Local Plan to assist with meeting the new homes required to be delivered over the next 5 years. Pond Cottages would be one such suitable site.

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Yes, I wish to participate at the oral examination

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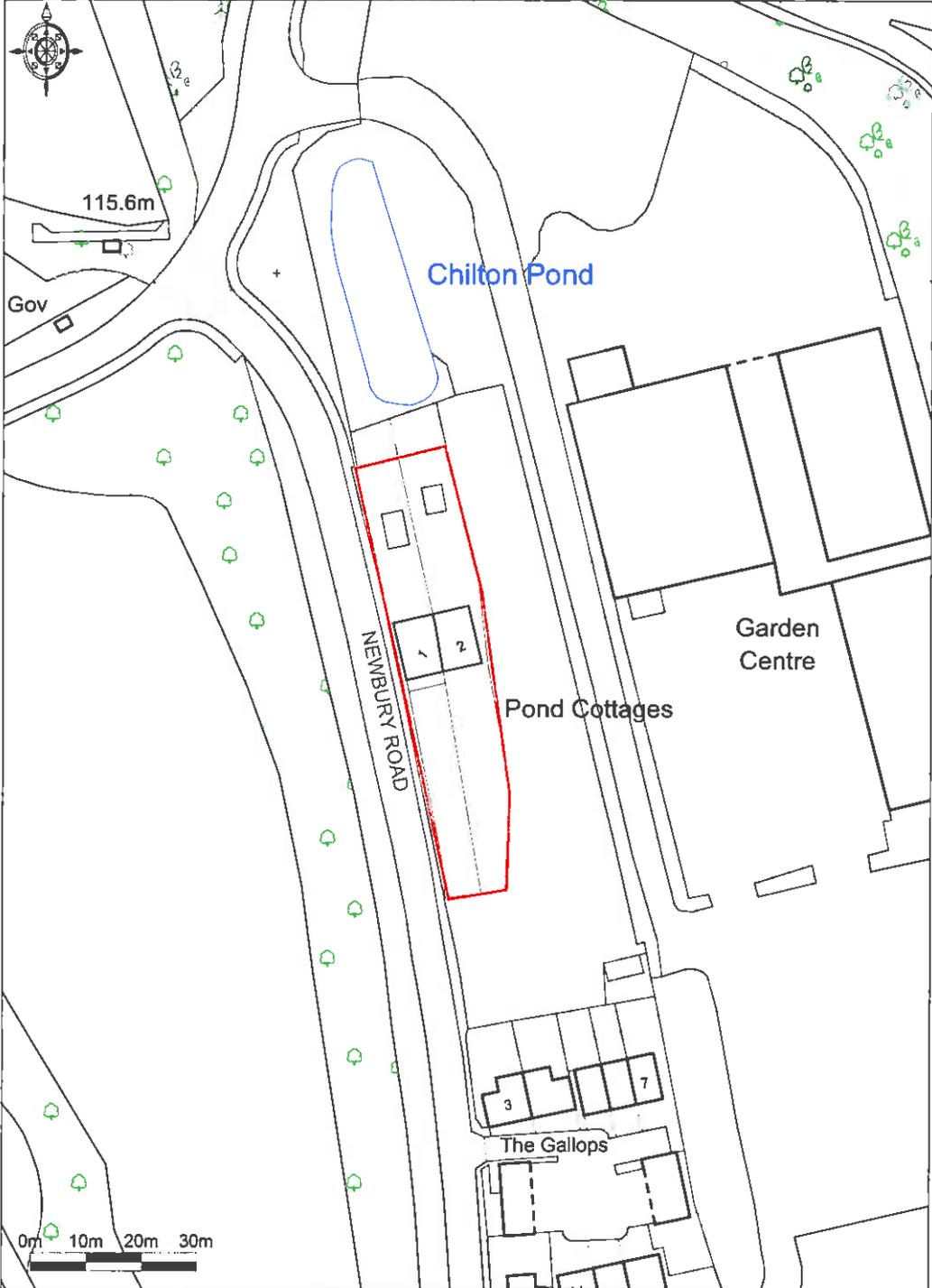
Signature:

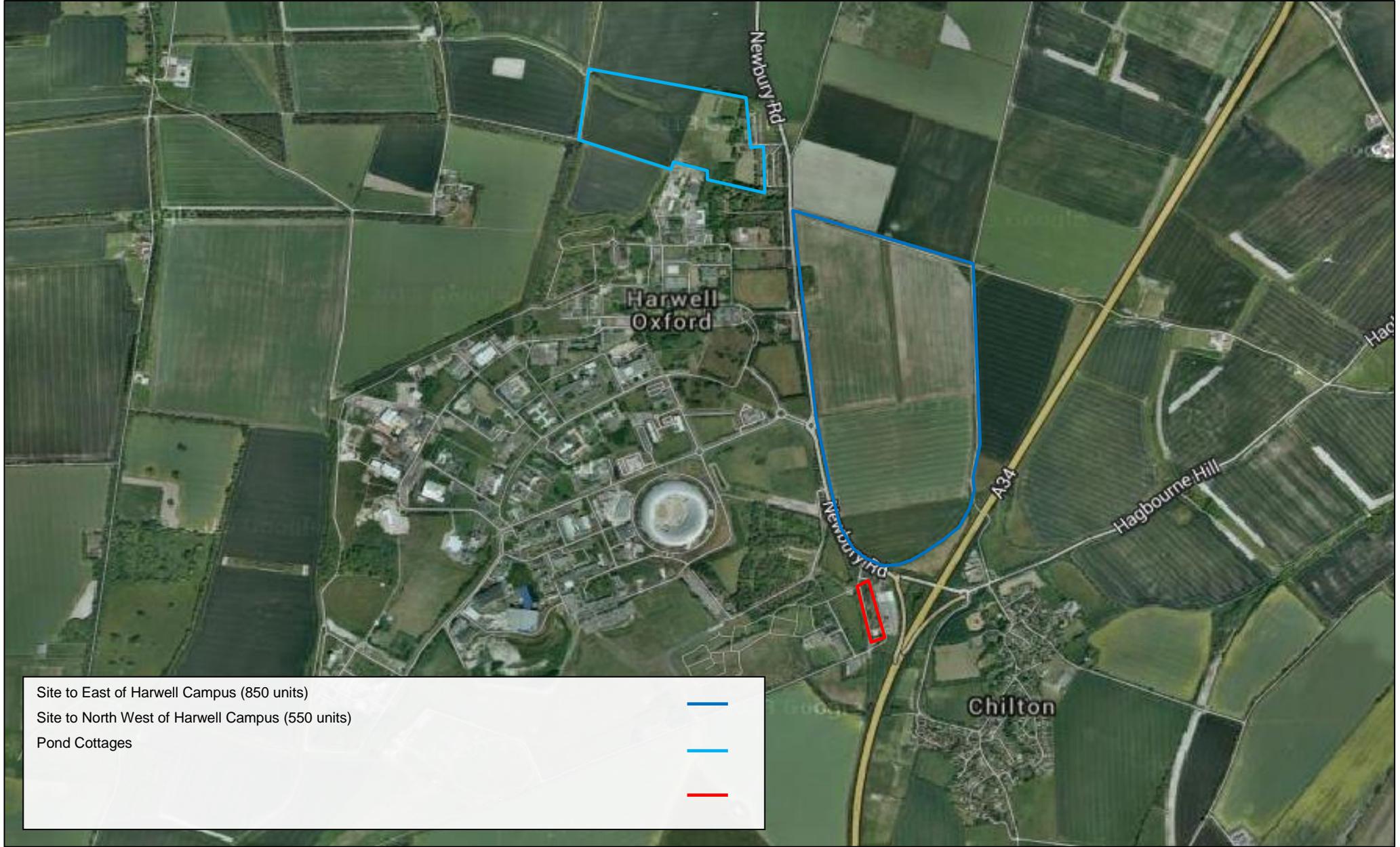
A large black rectangular redaction box covers the signature area.

Date:

19/12/14

Pond Cottages - 1:1250 Site Location Plan





Site to East of Harwell Campus (850 units)

Site to North West of Harwell Campus (550 units)

Pond Cottages

