

Gregory Gray Associates

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Planning Policy
Vale of White Horse District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

25th March 2014

Our Ref:

Dear Sir/Madam,

VALE OF THE WHITE HORSE LOCAL PLAN 2031 STRATEGIC SITES AND POLICIES HOUSING DELIVERY UPDATE CONSULTATION AND SHLAA 2014 UPDATE CONSULTATION

Gregory Gray Associates is instructed to submit the following representations on behalf of our client, The Garden Centre Group, owners of Chilton Garden Centre, Newbury Road, Chilton in response to the above consultations.

These comments should be read within the context of our earlier correspondence dated 4th March 2013 in which the Council was requested to consider our client's site as suitable for housing purposes within the SHLAA and the emerging Local Plan (copy attached).

2014 SHLAA Update Consultation

Following the submission of Chilton Garden Centre for consideration as part of the Authority's Strategic Housing Land Availability Assessment (Site VO69) the Council has deemed the site to be '*unsuitable*' for future housing development '*due to loss of existing employment use*'. The site's location within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) is also noted and it was considered that '*care is required with respect to this*'.

Our client is concerned that the assessment of the site's suitability for housing purposes is not consistent with national policy advice or emerging development plan policy. There appears to be a further inconsistency in respect of their decision on the suitability of our client's site relative to others within the immediate vicinity.

The principles of sustainable development set out in the NPPF seek a prudent use of natural resources through the effective use of land by encouraging the re-use of previously developed sites (para. 17). It is a fundamental tenet of Government policy that, subject to consideration

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of any environmental constraints, the use of 'brownfield' sites should be prioritised over Greenfield ones.

As set out in our earlier correspondence, Chilton Garden Centre is a highly developed, 'brownfield' site, currently occupied by large retail glasshouses, canopies, a plant display area and car parking. There is the potential to redevelop the site for alternative purposes, without having any additional impact upon the character of the surrounding area either in terms of the built form or the level of activity and traffic generation associated with the new use.

It is recognised that the site lies within the AONB, and the '*exceptional circumstances*' relating to the need for new development in this area have been set out in our earlier correspondence and also within the Council's current Consultation Document.

However, in assessing the suitability of two sites, both located within the AONB, Government guidance would clearly dictate that priority should be given to re-developing the brownfield site over its undeveloped, greenfield alternative.

The Council have failed to do this in the 2014 SHLAA update, identifying four sites (HASCC 03, 04, 05 and 06) which are located immediately to the north of Chilton Garden Centre as '*suitable*' for housing development. These sites, which together form the East Harwell Oxford Campus Strategic Allocation are all currently undeveloped, agricultural land, also located within the AONB.

The Council's 2014 SHLAA Update indicates that one of the policy constraints relating to our client's site is '*Loss of employment??*'. The use of the two question marks is suggestive of the fact that no investigation has been undertaken as to the nature or extent of any employment that might be affected and yet this is used as the sole reason for deeming the site '*unsuitable*'.

Our client's site is currently in retail use. Whilst obviously this does involve an element of employment, no protection is given to the retention of this type of commercial use within the Policies of the emerging Local Plan and specifically Core Policy 25.

Accordingly, it is considered to be entirely contrary to the Council's own policy approach, to reject the housing potential of our client's site on the basis of a loss of employment when emerging local policies provide no protection for the existing use.

Whilst the AONB status of the site is recognised, this is obviously not considered to be an overriding constraint to suitability by the Council, as evidenced by their approach to Sites HASC 03 – 06.

The Council are therefore requested to revise the 2014 SHLAA update to recognise the '*suitability*' of our client's site to provide future housing development. Since the site could be made '*available*' within the short-term and there are no known constraints to '*achievability*', it should be considered as '*deliverable*' for the purposes of the 2014 SHLAA Update.

Housing Delivery Update Consultation

The Housing Delivery Update seeks to allocate land to accommodate an additional 7,430 homes over the Plan period, in order to meet updated housing targets. It is intended that this new development be focused within the Science Vale Oxford area with an allocation of 1400 homes (potentially increasing to 2000 after 2031) located to the east of the Harwell Oxford Campus which is located immediately to the north of Chilton Garden Centre, divided from it only by the highway network.

The Council seeks to provide a concentration of new homes in this area since it adjoins a significant employment site where the largest number of new jobs will be created over the Plan period. Despite the site's location within the North Wessex Downs AONB, this site is identified as being a highly sustainable location for development, not least because of Harwell Campus' internationally significant status for innovation and technology. This is deemed to constitute '*unique and exceptional circumstances to support further development within the AONB*' and any new development is intended to improve the sustainability of the site, increasing opportunities for people to live and work closely together, and to provide a better range of services, facilities and public transport options.

As identified above, our client's site provides a suitable site for new development due to its previously developed nature and its location immediately to the south-east of the East Harwell Oxford Campus which means that it benefits from all of the advantages of sustainability identified by the Council in relation to the Strategic Site.

The emerging Local Plan 2031 seeks to make both housing and employment allocations within the immediate vicinity of the site and given the previously developed character of our client's site it should have been one of the initial choices for allocation, prior to the consideration of neighbouring undeveloped land.

The stated aim of Core Policy 3 is "*to identify the scale and location of housing to ensure growth in the Vale of White Horse District is delivered in the most sustainable manner*". Our client fundamental challenges the veracity of this statement if, as currently seems to be the case, Greenfield sites are allocated in preference to brownfield ones.

The proposed housing target is for at least 20,560 homes to be delivered in the Plan period between 2011 and 2031 of which 11,830 dwellings will be delivered through strategic allocations. It is requested that the Council include Chilton Garden Centre as part of the East Harwell Oxford Campus Allocation with the intention that it could provide approximately 83 additional dwellings. Alternatively, the site could provide an additional employment allocation, complementing that proposed to the west of the Harwell Oxford Campus.

The allocation of Chilton Garden Centre for housing or alternative commercial purposes represents a sustainable option for accommodating new development within this environmentally sensitive part of the District over the Plan period. Accordingly, the Council are requested to review the 2014 SHLAA Update and identify the site as a '*deliverable*' housing site and to revise the Local Plan Strategic Sites and Policies Housing Delivery Update to include Chilton Garden Centre as part of the strategic allocation to the East of the Harwell Oxford Campus or as a complementary commercial allocation.

Should you have any queries please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J Male' with a period at the end. The signature is written in a cursive, flowing style.

Joanna Male
cc Client