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| **New%20Image1** | **Local Plan 2031 Part 2**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** |  |
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| **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](mailto: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\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |
| \*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 | | Mrs | | |  | |  | | |
|  | | | | | | |  | | |
| First Name | | Helen | | |  | |  | | |
|  | | | | | | |  | | |
| Last Name | | Marshall | | |  | |  | | |
|  | | | | | | |  | | |
| Job Title (where relevant) | | Director | | |  | |  | | |
|  | | | | | | |  | | |
| Organisation representing | | Campaign to Protect Rural England, Oxfordshire | | |  | |  | | |
| (where relevant) | | | | | | |  | | |
| Address Line 1 | | First Floor | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 2 | | 20 High Street | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 3 | |  | | |  | |  | | |
|  | | | | | | |  | | |
| Postal Town | | Watlington | | |  | |  | | |
|  | | | | | | |  | | |
| Post Code | | OX49 5PY | | |  | |  | | |
|  | | | | | | |  | | |
| Telephone Number | | 01491 612079 | | |  | |  | | |
|  | | | | | | |  | | |
| Email Address | | director@cpreoxon.org.uk | | |  | |  | | |
| **Sharing your details**: please see page 3 | | | | | | |  | | |

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

Name or organisation: CPRE Oxfordshire

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

Paragraph Policy Policies Map

15a

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant No

4. (2) Sound NO No

4. (3) Complies with the Duty to Cooperate 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.  If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments. |
| North-West of Grove  The Local Plan Part 1 (LPP1) focused on housing and economic growth within the South-East Vale Sub-Area and identified strategic housing at Wantage and Grove, amounting to some 4,885 dwellings on sites 14, 15 and H5.  In the Inspector’s report he notes that ‘*by any measure [this] would represent a significant expansion of these settlements*.’ (Para. 132), and that ‘*Inevitably the character of both Wantage and Grove will change to some degree, but this is not to say that it would be harmed*.’ (Para. 134).  Despite the Inspector’s acknowledgement that Wantage and Grove had borne the brunt of a large percentage of the total housing allocated in the South-East Vale Sub-Area, the Part 2 Plan includes an *additional* site allocation at ‘the local service centre of Grove’ for 400 dwellings (initially 300 at the Preferred Options stage, but revised upwards to 400 in the Publicity Version).  The removal from the Part 1 Plan of two sites proposed on land adjoining Harwell Campus within the North Wessex Downs Area of Outstanding Natural Beauty, reduced the planned housing supply in the Science Vale by 1,400 dwellings. The 400 houses allocated to North-West Grove in Part 2 of the Plan is intended as part replacement of these sites.  The Council justifies this replacement on the grounds that it will ‘provide additional housing supply’ (para.2.96). Yet the Inspector clearly acknowledges in his report that strategic housing at Wantage and Grove in Part 1 of the Plan has already been substantial, amounting as he says to a ‘significant expansion’ of Wantage and Grove. We are unclear therefore what evidence exists that suggests ‘additional housing supply’ is needed in Grove. If an additional 400 houses were needed in Grove, surely these should have been allocated in Part 1 of the Plan?  CPRE sees no reason for *any* additional housing to be added in the South-East Vale Sub-Area by the Part 2 Plan. The Part 1 Plan has provided enough land for the proposed government housing target for the whole Vale District (2014 SHMA), *plus* an updated allowance for overspill from Oxford. (See CPRE's response to CP 4a).  The rationale included in the Plan Part 2 suggests that the Council is also allocating additional housing at North-West Grove to support the Council’s objective to support the Science Vale area.  The Science Vale growth was adequately covered in the 2014 SHMA and the figures in the Local Plan Part 1 therefore include the growth of the Science Vale**.**  The addition of 400 homes at North-West Grove is therefore not in accordance with the ‘spatial strategy’ set out in the Part 1 Plan, which makes provision for growth of around 23,000 new jobs, 218 hectares of employment land, and at least 20,560 new homes, to be delivered during the plan period from 2011 to 2031.  The Council goes on to say that additional housing is required to: ‘*help to achieve and maintain a sustainable balance of housing and employment within the Science Vale area by ensuring that housing is located close to the provision of new jobs and is accessible by sustainable modes of travel*.’ (Para.2.96).  Yet Grove is *not* located close to the provision of new jobs – it is some 8.2 miles from Milton Park, 8.4 miles from Harwell Campus and 12.6 miles from Culham Science Centre - unless it is envisaged that the Grove Business Park will provide jobs for all the new residents of Grove. In his report, the Inspector acknowledges ‘It is the case that Wantage and Grove are some distance from the envisaged employment growth at Harwell Campus.’ (Para. 132).  Nor is Grove currently ‘accessible by sustainable modes of travel’. As the Inspector quite rightly notes ‘significant public transport improvements are *envisaged’* (para. 132) (our emphasis) – however,, they are not yet in place and as such, no additional homes should be allocated to the area until these improvements have materialised.  The Vale says ‘*It is important that the new development planned for Wantage and Grove delivers infrastructure (such as new services, facilities and roads) alongside the delivery of new housing*.’ (Para. 2.99). (Our emphasis).  Yet housing is being delivered in Wantage and Grove at a rate that is far outstripping the delivery of planned infrastructure. If the planned infrastructure for site allocations in Part 1 of the Plan are not being delivered on time, it begs the question how the infrastructure for the additional site allocation in Grove will be delivered on time.  Curiously, the Vale says ‘*To assist with infrastructure delivery in this area [Wantage and Grove], an additional development site is allocated in the Part 2 plan at North-West Grove on land between the Monks Farm and Grove Airfield sites*.’ (Para. 2.99).  It is unclear how a new housing development (ie 400 dwellings at North-West Grove) could ‘assist with infrastructure delivery in this area’. If the Council is failing to deliver the required infrastructure for the new housing already delivered in the area, surely the provision of *more* houses would put even greater infrastructure pressures on Wantage and Grove.  The Vale clarifies what it actually means in para. 2.100 ‘The allocation of the North-West of Grove Site will assist with delivering the North Grove Link Road (NGLR) that will form an important connection between Grove Airfield and the A338, along with contributing to a range of other services and facilities.’  However, it is unclear how the allocation of an additional 400 dwellings at Grove could ‘assist with delivering’ the NGLR. Surely the income generated for the Council from 400 dwellings would be a drop in the ocean – it is much more likely that the income generated for the Council from the 4,885 dwellings on sites 14, 15 and H5, as envisaged in Part 1 of the Plan, will ‘assist with delivering’ the Link Road.  The delivery of the Link Road is therefore not dependent on the allocation of an additional 400 homes at North-West Grove.  The Vale is also strangely silent on the ‘services and facilities’ the income generated from the additional 400 dwellings at North-West Grove would provide. What would these services and facilities consist of and where would they be located? If the provision of these ‘services and facilities’ is a justification of the additional site allocation at North-West Grove, then the Vale needs to establish the need for these services and facilities, so the evidence can be properly evaluated.  The Vale’s admission that the housing development on the North-West Grove site ‘*will not come forward until towards the end of the plan period and much closer to 2031*’ (para. 2.100) suggests to us that the 400 houses are not *needed* in Grove, are not *needed* in the Science Vale area,and moreover, are not *needed* within the Plan period.  (Continue on page 4 /expand box if necessary) |

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| 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. |
| For the reasons cited above, it is our understanding that the additional site allocation of 400 dwellings at North-West Grove is unsound and we recommend the deletion of Core Policy 15a from the Plan  (Continue on page 4 /expand box if necessary) |

**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

YES

|  |
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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and  would wish to contribute to any related discussion. |
| ***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:

**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

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

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form 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](mailto:planning.policy@whitehorsedc.gov.uk)