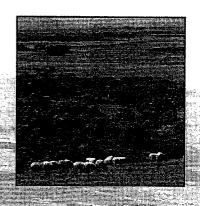




# HOGAL PLAN









lispector's Report February 2006



#### **RECOMMENDATION - CHANGE**

See 8.17 below

#### 8.17 H5 - HOUSING DEVELOPMENT IN GROVE (OMISSION SITES)

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#### **Objections**

499/15	Gallagher Estates Ltd & Gleeson Homes Ltd
501/82	Martin Grant Homes Ltd
334/4	Crown Cork and Seal
397/28	Persimmon

#### **Issues at First Deposit**

- a. Land north of Grove should be allocated for mixed development, including 1,000 houses (52.5ha).
- b. Land north of Grove at Monk's Farm should be identified for housing.
- c. The Crown Cork and Seal site (6.7ha) should be allocated for housing.
- d. The airfield site allocation should be extended north to Denchworth Road.

#### **Issues at Second Deposit - as above.**

#### **Inspector's Reasoning and Conclusions**

- 8.17.1 Land north of Grove (issue a) Objectors seeking the allocation of 52.5 ha. Of land for mixed use development between the A338 and Cow Lane, as an alternative or precursor to the H5 site, have been conditionally withdrawn. This is on the basis of the "agreement" referred to in para 8.16.1 above and that the contents of part xiv a) of the policy and para 8.29a of the plan would revert to that set out in the revised deposit. As I have essentially endorsed the proposition that the new northern link road (NLR) to the north of Grove should be provided during the second phase of development, i.e. 2011 2016, it is no longer necessary to consider these objections in detail.
- 8.17.2 However, it is necessary, in my view, to record that had they not been conditionally withdrawn, I would not have recommended that this land be allocated for new housing development, either separately, or in connection with, or as an alternative to the H5 site in this plan period. This is largely because it contains mostly land of BMV agricultural quality, as well as the floodplain of the Letcombe Brook, a number of LBs and a more attractive farmland landscape of hedges and fields, compared to the allocated site, without being any better located in relation to the existing settlement and its relatively limited existing services and facilities. Nor do I accept the argument that because it would need to be crossed by the new road it should be developed first, if only because the new road is not actually required to serve the initial phase of development on the former airfield site.
- 8.17.3 Land north of Grove (Monk's Farm) (issue b) These objections propose that around 36 ha. Of land on the northern edge of the settlement should be developed before any new housing on the former airfield to the west and that this site could provide all of the new dwellings needed in Grove in the plan period. It could also deliver the first part of a NLR running west from the A338 as part of a mixed use development. I have acknowledged elsewhere in this report that the

Mato or allande letouéte repoet Plais montre : magazisto é a Repoete areas in the district is essentially descriptive and does not alter their status in planning terms, nor that of other sites in the Didcot area not specifically mentioned. It is therefore not necessary to add to this paragraph to refer to any other sites (issue d).

11.1.3 In relation to the more general matters raised in issues e – h inclusive, the plan's employment strategy has to follow that of the OSP in seeking to restrain the overall level of growth, whilst maintaining a balance with new housing development. It also seeks to encourage a strong and sustainable economy by permitting some new development in appropriate locations. By seeking to largely retain existing key employment sites in business uses, with limited additional allocations on sustainably located sites where a local need has been identified, such as at Faringdon, I believe that the plan is generally well formulated to achieve that aim. In attempting to concentrate growth in the main settlements, increases in car use for commuting to work should be minimised, whilst the encouragement of alternative travel modes at established rural sites should help to reduce peak hour road congestion to a degree. Given the location of existing employment areas across the district and the results of the most recent surveys, I am also satisfied that a variety of size and type of sites for new employment exists at present.

## **RECOMMENDATION - NO CHANGE**

# 11.2 E1 - SITES FOR BUSINESS DEVELOPMENT IN ABINGDON

#### **Objections**

458/1 Gazeley Properties Ltd	388/13 464/3 170/SD/12	Kimberley Developments Plc/Barratts Maidenneau Abipadon Town Council
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### **Issues at First Deposit**

- a. Site south of Marcham Road should not be allocated for business purposes.
- b. A site north of Abingdon between Dunmore Road and the A34 should be identified as an employment site.
- c. The employment land allocation strategy is misconceived.
- d. Land south of Tesco should be allocated for retail or employment.
- e. Allocate Thames View Industrial Estate for mix of housing and employment.
- f. Policies should not refer to "The Council".

## **Issue at Second Deposit**

sa. Land at Thames View should be retained for employment.

# **Inspector's Reasoning and Conclusions**

	Local Churches In Grove	367/6
	Mrs Sue Lockley	6/10
	Mr & Mrs Chris & Sarah Gray	381/2
	Martin Grant Homes Ltd	501/95
ADDENDIVA	Persimmon Strategic Land (Western)	397/45
APPENDIX 2	Martin Grant Homes Ltd	501/94
	Martin Grant Homes Ltd	501/93

Visigaroj i kina a tioninga kujost filozo silākā tipagojardinis Radolija

#### **Issues at First Deposit**

- a. A link between Mably Way and the A417 at Challow should be in place before significant development commences.
- b. An additional land should be allocated to the north of the Park to allow for need generated by proposed 2,500 houses.
- c. Limit of 2.4 hectares will prevent Crown Cork & Seal relocating to the Park from their unsuitable site.
- d. Provide further employment locally to avoid pressure on overloaded transport system, encourage cycling and protect the environment.
- e. Transport links to existing employment areas should be improved to avoid the need for further employment allocations.
- f. Grove Technology Park is a poor site for development and the reference to B8 uses should be deleted.
- g. Land should be allocated for employment; to the north of Grove either side of the A338, on the former airfield to give a mix of uses, at Station Road, Grove, at Manor Farm, Manor Road, Wantage.

#### **Inspector's Reasoning and Conclusions**

- 11.5.1 Para 11.40 refers to contributions being sought by the Council for road improvements in the Wantage/Grove area. This could include the possible western extension of Mably Way to the A417 at Challow in the longer term (issue a). However, the allocation of the vacant land north of the GTP for employment in this plan merely follows that made in the former LP. Consequently, it would be inappropriate, and in my view unreasonable, to now expect that development should only take place there if the link to the A417 were built first. In particular, the amount of new floorspace arising from this scheme alone would be unlikely to generate levels of new traffic justifying the need for such a road in highway terms.
- 11.5.2 Approximately 5 ha. of allocated land remains to be developed at present to the north of GTP (issues b and d). The limited level of recent take up on the site and the presently somewhat isolated situation west of the former airfield runways, suggests that this area will be sufficient to meet locally generated needs for new employment provision over the plan period up to 2011, despite the new housing proposed nearby, if only because much of it will not be completed before that date. Consequently, I endorse the Council's view that, in the current circumstances at least, the case for additional greenfield land to be set aside for additional employment growth here is not proven. Although I share some of the concerns expressed regarding the future balance between new housing and jobs in the Grove area in relation to policy H5, I do not consider that this alone provides a justification for further expansion at GTP now as the matter can and should be reconsidered when this plan is reviewed and the results of a comprehensive

districtwide study of existing employment provision are available.

- 11.5.3 Whilst noting that some small B1 units might be provided as part of the proposed new district centre under policy H5, the Council's promise to review the position regarding employment land provision and availability in the Grove area in their next plan for the period after 2011 seems to me to be more important in this context. In the event that the present allocation has been developed by that time a case might be made for expansion of GTP, either on land to the east within the H5 allocation, if available, or failing that to the north. At present, however, no such need justifying the release of additional greenfield land for new employment development at GTP exists.
- 11.5.4 Objectors oppose the policy restriction on a single user taking more than half of the allocated site at GTP. The Council acknowledges that in respect of any serious proposal by CCS to relocate to this site from their present one, which is too large for their current operations, the fact that they are a long-established local firm would be taken into account. That being so and subject to policy E10 continuing to protect the existing CCS location as an employment site, rather than for any alternative uses such as housing, as I recommend, I doubt the real need for this policy to preclude a single user occupying more than about half of the site.
- 11.5.5 Apart from removing a somewhat arbitrary restriction on the marketing of the site, it is possible that relocation to GTP would not only allow CCS to remain as an important local employer but also to release their existing site and buildings for conversion and/or redevelopment for a mixed business scheme that would provide a significant overall increase in local employment opportunities and accommodation for smaller firms. Moreover, in my experience, development by a single user rather than for a number of smaller operations is more likely to assist in the achievement of the objectives for the site set out in para 11.42. In my opinion, the location and nature of the site is such that the "risk" of the whole being occupied by a multi-national company seeking a new UK headquarters is in any event small. However, bearing in mind the number of new houses planned to be built alongside and the spin off economic benefits likely to arise locally, if it occurred I see no reason why it should be opposed in principle here.
- 11.5.6 In relation to issues e and f, the plan acknowledges that many Wantage and Grove residents currently travel elsewhere to jobs in para 11.38 and that current road and public transport links require improvement. This explains the limitation on new B8 uses at GTP, which I endorse, and the references to contributions, including for public transport, from new developments, notably the H5 housing allocation. Nevertheless, it would be overly restrictive to seek to preclude all new B8 uses on GTP, particularly in the light of the site's allocation in the former LP and the current legal agreement in force on the site, both in general terms and in relation to likely traffic generation, including HGVs. I therefore see no need to change the policy or its supporting text as a result of these objections.
- 11.5.7 Objections relating to the allocation of land to the north of Grove as an alternative or in addition to that proposed principally for new housing under policy H5 are dealt with in chapter 8 and not repeated here. Additional small sites put forward as potential employment land allocations in and around Grove are, however, considered below.
- 11.5.8 The existing small employment site of about 0.2 ha. at Station Yard, Grove, to the east of the A338 and south of the main rail lines, is put forward as suitable for additional employment development on around 2.3 ha. (issue g). This would be in connection with the construction of a new road from the Williams F1

roundabout serving the proposed reopened station. At the inquiry, it was confirmed that the new road proposal is being pursued by OCC as highway authority by way of a planning application, as part of their support for the overall project. However, it is common ground that implementation must await the availability of further resources and the resolution of technical and operational constraints to permit the reintroduction of the necessary rail services. In such

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circumstances, there is no suggestion that allocating additional employment land here would directly assist in bringing forward the scheme to reopen Grove station.

11.5.9 It would however result in the unnecessary loss of over 2 ha. of productive farm land and the significant and potentially visually intrusive extension of built development into the open countryside to the east of A338. The site is not particularly well related in walking or cycling terms to either the existing built up area of Grove, or the proposed western expansion area at present. In the absence of any overriding need for new employment provision in this location, I agree with the Council that there is no justification for such an allocation in this plan period.

- 11.5.10 Given its size and semi rural location, as well as its function in providing small "starter" units for local businesses at reasonable cost, nor do I consider that there is any need for the existing employment site to be formally identified by an allocation in the plan. Any proposals for redevelopment here may reasonably be considered in accordance with criterion iii) of policy E9, as the Council suggests.
- 11.5.11 Essentially, the same conclusions apply to the site at Manor Farm on the A338 almost a mile south of Wantage in an entirely rural location in the open countryside forming part of the AONB and therefore also subject to policy NE6 of the plan. Accordingly, I do not support any changes to the plan's policies or text arising from these objections.

#### **RECOMMENDATION - CHANGE**

Delete the last sentence of the policy and para 11.41.

#### 11.6 E5 - NEW BUSINESS DEVELOPMENT AT MILTON PARK

#### **Objections**

220/3	Milton Parish Council
321/4	MEPC Milton Park Ltd
479/15	Highways Agency
458/5	Gazeley Properties Ltd
466/2	Sustrans
298/58	Oxfordshire County Council
476/2	Railtrack Plc
321/SD/2	MEPC Milton Park Ltd
458/14	Gazeley Properties Ltd
297/31	Innogy Plc
297/32	Innogy Plc
299/2	Government Office For The South East

#### **Issues at First Deposit**

# Highway Authority Comments Oxfordshire County Council

#### Planning Application No GRO/20495

Outline application for mixed-use Class B1 development, open space and playing fields with associated changing and car parking facilities.

The Applicant submitted a Transport assessment with the application. This reviewed the public transport links to the site. The bus services X30, N30, 31, 32 and 36 run past the site. The 31 provides 30 minute peak hour service and hourly off peak to Abingdon-Oxford-Wantage. The other services provide a basic service to Didcot, and Abingdon. The 38 service runs an hourly week day service from Grove to Wantage. A bus stop and shelter is to be provided outside the site.

The assessment acknowledged the limited pedestrian and cycle facilities in the area and proposes a footway link to Oxford Lane leading to the residential area of Grove.

The access proposal is for a priority junction on the A338 allowing all movements into the site but only left turn out.

The assessment recognises the possible northern link road and phasing of Grove airfield residential area.

The 2007 background traffic was collected from survey data and then using growth factors produced the 2013. Committed development traffic flows and the proposed development traffic was added to produce the 2013 background traffic/ committed development (900 residential units at grove airfield) /proposed development network flows.

Proposed development traffic was estimated by using 4 sites from TRICS database which had a travel plan and the resultant trip rate applied to an assumed 17,330 sqm of B1 development..

The trips were distributed on the network based on the journey to work origin and destination datasets from the 2001 census. The 2013 scenarios were tested with and without the Grove airfield northern link road using traffic model information being supplied by Oxfordshire County Council.

Junctions in the area were then analysed using standard highway computer programs.

The broad results are as follows

Junction	2013 results
A338/A415 signal controlled	2 arms above practical capacity
junction	in am pk
A338/Grove Park drive	Near capacity in am pk
A338/Oxford lane	Near capacity
A338/Main street signals	Within capacity
A338/Mably way r/bout	Near capacity in am pk
A338/Harcourt Road	Near capacity on 2 arms
A338/Limborough Lane	Within capacity
A338/Humber Close	Well within capacity
A338/Little Lane	Well within capacity
A338/A417 R/bout	Within capacity
Site access	Well within capacity

#### Comments on the application.

The trip generation figures used are considered low and there does not seem to be any great logic to selecting the sites on the basis they have travel plans. Two of the sites selected from TRICS are council offices. These are likely to be able restrict car travel by issue of parking permits or car park size. They are single user sites whereas the proposal is for multi occupancy site. There would be no control on people driving to work at the proposed site as there are no on street parking restrictions currently or proposed.

The fact a travel plan is being offered is unlikely to have any great influence on actual modal splits for trips to the site. From experience Travel plans are very difficult in practice to apply to multi occupier sites.

The concerns regarding the impact of the traffic generation are heightened by the fact that by 2016 some 1500 dwellings will be completed on Grove airfield as opposed to 900 assumed in the 2013 design year.

Whilst the applicant proposes to construct a footway along the A338 from Oxford Lane it is not considered that the office park integrates well with the residential area and the likelihood of residents of Grove working at the site is small and even if they did they would be tempted to drive.

The access arrangement of left out and all movements in would in theory be attractive but in reality it would be difficult to enforce. It is not considered to be acceptable as currently proposed.

The Highway authority therefore object to the proposal on the basis of likely impact on the highway network contrary to policy T8 of the Structure plan and the transport sustainability of the site contrary to policy G1,G2 and T1.

# Oxfordshire County Council As Structure Plan Authority

Outline application for mixed-use Class B1 development, open space and playing fields with associated changing and car parking facilities.

Location: Land North of Bellinger's Garage, Station Road, Grove		Division	Grove & Wantage		
		Local Member	Cllr Jenny Hannaby and Cllr Zoe Patrick		
Application	GRO/20495	District Planning	Vale of White Horse District		
No.	08/00527/OUT	Authority	Council		
Applicant	Rey Construction Ltd				
Response	30 May 2008				
Deadline					

#### **Proposed Development:**

1. Outline application for mixed-use Class B1 development, open space and playing fields with associated changing and car parking facilities. Proposed creation of 17,580 square metres total gross internal floorspace. Of this 280 square metres are proposed for changing facilities and 17,300 for B1 (b) use (research and development).

#### Relevant Background:

- 2. 4.3 ha of a 9.2 ha site would be used for built development. The site is in agricultural use (described as formerly agricultural use by the applicant, but still used for grazing) within an area of Lowland Vale. Much of the site would be used for a sports field, which would be outside the built up area of Grove. The units are described as high quality B1 units, but the development is speculative and there is no specific user identified.
- 3. This site was not designated in the Vale of White Horse Local Plan 2011. The site to the north was allocated as a Key site protected for Business Use in the Vale of White Horse Local Plan 2011. There is a route for a new or improved cycleway to the east of the site.
- 4. The applicants estimate that there would be 538 645 new jobs created directly as a result of the B1 uses which they say would provide more job opportunities in Grove and reduce the need for people in Grove to commute elsewhere for jobs.
- 5. The site was not allocated in the current Local Plan. It was considered as an "omission" site representation, but the Local Plan Inspector favoured allocation of the airfield site, rather than this site. The Inspector commented that the site might be better suited to employment development in the long term, than housing, due to noise issues. He referred to the main road frontage to the A338 between Williams F1 and Bellingers Garage as included in this.
- 6. Supporting documents submitted with the application include:
- Planning Statement
- Design & Access Statement
- Waste Minimisation Strategy
- Environmental Statement
- Statement of Community Involvement
- Transport Assessment

#### **Relevant Structure Plan Policies:**

Structure Plan policies: G1, G2, G5, G6, T1, T2, T3, T6, T8, EN1, EN2, EN3, EN6, E1, E6 & R2.

#### **COMMENTS**

#### Main Policy issues:

#### Locational

7. The application site is greenfield and therefore the proposal is contrary to Structure Plan policy G1 and Planning Policy Statement 1: Delivering Sustainable Development. The site is not coterminous with the existing built area of Grove. Structure Plan policy G5 (development outside settlements) discourages harmful development outside settlements but gives special consideration to uses like agriculture, forestry, outdoor recreation and other uses appropriate to a rural area.

#### **Economic Issues**

- 8. The County Council has no objection in principle to the provision of extra employment land in the Wantage / Grove area if it is necessary to keep pace with housing growth and reduce the need for commuting elsewhere, in line with Policy E6 of the Structure Plan 2016. However, there is currently 5ha of employment land at Grove Airfield which has not been taken up, so there is no justification for developing a greenfield location outside the developed area of Grove at this time. If the District Council considers that the expansion of Grove will lead to a demand for additional employment in the area this is should be dealt with through the Local Development Framework, so that it could be properly linked to housing and infrastructure.
- 9. In terms of mitigating Climate Change, development that reduces the need to travel would be beneficial.

#### **Transport**

- 10. The Council as Highways Authority objects to the proposal on the basis of likely impact on the highway network contrary to policy T8 of the Structure Plan and the transport sustainability of the site contrary to policy G1, G2 and T1. The site is remote from Grove and not best placed to encourage travel from Wantage and Grove by means other than the car.
- 11. The Highways Authority has reservations about the trip generation rates for the site being quoted in the Transport Assessment accompanying the proposal. There are concerns that the trip generation for cars set out in the Transport Assessment is too low. Only four sites have been chosen to compare with and the Highways Authority is not satisfied that the sites chosen are similar to the proposed use. There are no parking controls around the proposed site and the proposal is for the maximum permissible parking provision within standard.
- 12. There may need to be some clarification about traffic counts and the modeling used in the Transport Assessment.
- 13. Whilst the applicant proposes to construct a footway along the A338 from Oxford Lane, it is not considered that the B1 office park integrates well with the residential area of Grove and that even local employees may be tempted to drive.
- 14. The site is close to the Grove Station Policy Area and care should be taken that the proposal does not prejudice the re-opening of the Wantage Road, train station in Grove, as set out in policy TR7 of the Local Plan. Contributions towards the station would be required.

#### **Ecological constraints**

15. There are no designated wildlife sites or UK Biodiversity Action Plan priority habitats which would be affected by the proposed development.

- 16. There is no objection to the proposed development as long as any protected species issues are addressed and agreed, if necessary, with Natural England. There may also be the issue of breeding birds using the site and this may place limitations on the timing of the proposed development.
- 17. If permitted, the intention is to create 'ecology habitat' to the north of the main area of development. We would require more design detail on this area and how it will be maintained in future before commenting further. From an ecological point of view there is probably greater merit in creating a suitably designed buffer area adjacent to the Letcombe Brook. The County Ecologist has sent a detailed response to the District Council.

#### Rights of Way

18. There are no existing rights of way on the development site and the proposed built area would therefore appear to have limited direct impact. However, there are connecting rights of way in the locality, and such a facility is likely to be well used by residents of Wantage and Grove for work and leisure. This will impact upon this network by increasing pressure and demand for year round access. We would be expect to see that the development is accessible by walkers and cyclists on predominantly traffic free routes and that these routes include access to the Williams factory, as well as to the surrounding settlements and connecting countryside. We would anticipate these onsite works being set out and provided as part of any full planning application. The off site measures including improvements to existing public rights of way, new road crossing, and linking routes, should be provided for with an appropriate developer financial contribution under agreement.

#### Archaeology

- 19. The site of proposed development lies directly to the west of the Roman road that linked Alchester to Mildenhall. It is possible that part of the road system lies within the application area and the presence of roadside settlement or activity from that period should not be discounted. To the south, archaeological evaluation has identified the presence of later Bronze Age and Iron Age ditches with a hut circle and an undated inhumation. The full extent of this activity is not clear.
- 20. In accordance with PPG16, we would therefore recommend that, prior to the determination of this application the applicant should be responsible for the implementation of an archaeological field evaluation. This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight, which should be attached to their preservation.
- 21. The County Archaeologist has sent full comments to the District Council.

#### **General Comments**

22. If the district is minded to grant planning permission for the proposal – the county council recommends that it should be subject to: a) appropriate contributions to transport infrastructure b) ensuring that the design of the building and development as a whole achieves a low carbon footprint and incorporates design features such as sustainable drainage, use of porous hard surfaces

#### Local members views

23. None expressed

#### Conclusion

- 24. The proposed development is contrary to policy G1 of the Structure Plan. The site is greenfield and there is a lack of justification for needing this site for employment use. It is not allocated for employment in the adopted Local Plan.
- 25. The above report sets out work that the applicant should carry out in advance of the determination of the planning application.
- 26. The site is remote from Grove and not best placed to encourage travel from Wantage and Grove by

means other than the car. The Highways Authority is objecting to the proposal on the basis of likely impact on the highway network contrary to policy T8 of the Structure Plan and the transport sustainability of the site contrary to policy G1, G2 and T1.

27. If the District Council is minded to grant permission, this should be subject to appropriate contributions to transport infrastructure (including towards the Grove station) and Rights of Way improvements. It should also ensure that the design of the building and development as a whole achieves a low carbon footprint and incorporates design features such as sustainable drainage, use of porous hard surfaces.

The detailed comments of the Council as Highway Authority will be dealt with separately in the normal way.

#### **RECOMMENDATIONS:**

I recommend that the County Council as Structure Plan authority informs the Vale of the White Horse District Council in relation to application 08/00527/OUT that:

- a. It objects to the development proposed, as it is contrary to policy G1 of the Structure Plan. The location is a greenfield site and justification for needing this site for employment use is lacking. It is not a use that is set out in the adopted Local Plan.
- b. It requests that the required ecology work and archaeological field evaluation should be carried out prior to the determination of the application.
- c. As Highway Authority it objects to the proposal on the basis of likely impact on the highway network contrary to policy T8 of the Structure Plan and the transport sustainability of the site contrary to policy G1, G2 and T1.
- d. If the district is minded to grant planning permission for the proposal the county council recommends that it should be subject to:
  - i. appropriate contributions to transport infrastructure (including towards the Grove station) and Rights of Way improvements; and
  - ii. ensuring that the design of the building and development as a whole achieves a low carbon footprint and incorporates design features such as sustainable drainage, use of porous hard surfaces.

Planning	Tamsin Atley	Date	29.05.08	File	8.4/4090/8
Officer				No	

# COUNCIL'S DEUTOPMENT POLICY RESPONSE

#### Laura Hudson

From:

Peter Williams

<sup>1</sup>Sent:

29 April 2008 15:38

To:

Laura Hudson

Subject: Land North of Bellinger's Garage, Grove

#### Laura

I have the following comments to make on the application for employment development on the land North of Bellinger's Garage, Grove.

The area which is shown on the applicant's red line plan shows an area which is wholly outside the development boundary of Grove as defined in the adopted Local Plan's Proposals Map. Further the land is not subject to any allocation in the adopted Local Plan. The only designation that affects the land is that it is part of the Lowland Vale landscape area as referred to in policy NE9 in the adopted Local Plan.

Policy GS2 of the adopted Local Plan states that outside the development boundaries of the main settlements and specified villages "new building will not be permitted unless it is on land which has been identified for development in the Local Plan or is in accordance with other policies". As the land is not allocated for the proposed uses the application is directly contradictory to the Local Plan's strategy as set out in policies GS1 and GS2.

The most relevant Local Plan policy specifically in relation to employment is policy E9. This states that development for business purposes on sites not identified under specific proposals of the Local Plan will be permitted if the site is within the built up area of the five main settlements, within H11 villages for less than 500 sq m gross or outside the specified towns or villages where it is for the expansion of an existing business. This proposed development does not fall within any of the permissible categories and is therefore directly contradictory to policy E9 of the adopted Local Plan.

In relation to the need to protect best and most versatile agricultural land from development policy DC11 of the adopted Local Plan states that the development of such land will not be permitted unless there are no opportunities for accommodating the development on previously developed sites or land within urban areas or where this is not possible that development cannot take place on land of poorer quality due to sustainability considerations. The western part of the site outside the floodplain is Grade 2 and the remainder of the site is Grade 3a. As there is 5 ha of land remaining to be developed at Grove Technology Park there are alternative locations for this development. There is therefore no justification for the development on BMV agricultural land. As a result this application is contradictory to policy DC11 in the adopted Local Plan.

The site access is also almost 400m away from the nearest part of Grove and is therefore a substantial distance from the majority of housing in Grove. It is considered that this would be more likely to generate travel by car that the allocated site at Grove Technology Park which is directly adjacent to an area allocated for housing development. Policy GS10 in the adopted Local Plan states that new development will only be permitted where the need to travel, particularly by car, can be minimised. Given the distance between the proposed site and the nearest significant area of housing it is considered that it would be likely to encourage travel by car when compared to the allocated employment site at Grove Technology Park. The proposed development therefore does not accord with policy GS10 of the adopted Local Plan.

In relation to the above mentioned policy NE9 for the Lowland Vale landscape area the text of the policy states that development will not be permitted if it would have an adverse impact on the landscape. The proposed development would occur on an area currently used for agriculture and bounded by hedgerows. This situation is common to the majority of the landscape in the Lowland Vale landscape area. The replacement of this area of agriculture with industrial development and recreation facilities would introduce an alien form of development into the landscape which would alter the local landscape significantly. It is considered that this would be harmful to the landscape and the proposed development is therefore out of accord with policy NE9 of the adopted Local Plan.

It is noted that the planning policy context set out in the Environmental Statement set out by the applicant in support of the application fails to make reference to the policies set out above apart from policy GS10. Further, it is considered that the reference to policy GS10 which is mentioned is a deliberate misinterpretation of the policy. Policy GS10 aims to direct development to locations where car usage can be minimised whereas the location of this proposal away from Grove would be likely to have greater car usage than site in

or directly adjacent to Grove. It is also noted that the supporting planning statement fails to refer to any of the policies referred to above. As such it is a misleading distortion of the policy context provided by the adopted development plan.

On the provision of recreation facilities the Local Plan is silent apart from the protection of existing facilities or their provision in relation to new housing development in policy H23. As such there is therefore no justification for the provision of sports pitches as an isolated facility unrelated to housing. The provision of pitches in this location would place them at some distance from existing housing unlike the provision in relation to the housing on Grove airfield where the recreation provision will be directly adjacent to the new housing. This places the proposed recreation facilities in contradiction of policy GS10 of the adopted Local Plan.

In relation to the adopted Structure Plan, which also forms part of the development plan, policy G5 states that "the countryside will be protected from harmful development". The supporting text states "Where development is allowed on sites adjoining settlements it should respect existing settlement patterns, the gaps between them and the character of the countryside. While most development needs should be met within and adjacent to existing settlements, exceptional consideration will be given to proposals in other locations". The proposed development runs entirely contrary to the policy and supporting text in that the development is proposed on an area of open countryside beyond the development boundary of Grove and there are no exceptional circumstances to justify such a development.

Policy EN1 in the adopted Structure Plan states that development will be permitted only if it does not unacceptably damage the local landscape. It is considered that development of this agricultural land in an area of open countryside would unacceptably alter part of the rural landscape which surrounds Grove and would therefore damage it to such an extent that development should not be permitted.

Policy EN3 in the adopted Structure Plan refers to development on BMV agricultural land taking into account the quality and productiveness of such land. As stated above a major part of the site beyond the floodplain is grade 2 agricultural land. The developer has not advanced evidence to show that there are sustainability considerations which justify this development over other potential locations.

Policy E3 of the adopted Structure Plan states that a limited amount of employment land will be made available in Wantage and Grove. The site is not within Wantage. It is within open countryside beyond the development boundary. However this policy is essentially aimed at guiding provision in lower level development plans rather than controlling development directly.

The current Local Plan was adopted in July 2006. In the Inspector's Report on the Local Plan inquiry it is stated at 11.1.3 that the Local Plan was generally well formulated to achieve the aims of the Structure Plan in relation to employment development and the Inspector was satisfied that a variety of size and type of employment sites existed at that time. In relation to the further allocation of greenfield sites for employment in the Grove area the Inspector concluded in para 11.5.3 of his report that there was then no such need for such an allocation at Grove Technology Park. The same conclusion was then reached in relation to other greenfield sites related to Grove. However the Inspector noted as important that the Council would be reviewing the need for further allocations in the review of the Local Plan based on an Employment Land Review.

With the preparation of the Core Strategy the Council has commenced the review referred to by the Inspector at the Local Plan Inquiry and an Employment Land Review is underway. It would be premature to give consent for a significant area of employment development such as that proposed in the context of a Local Plan that was adopted less than 2 years ago when the replacement for the Local Plan is under preparation and where an Employment Land Review still has to be completed. The appropriate process is to examine the suitability of all potential sites as part of the preparation of the Local Development Framework and allocate the most suitable sites if necessary taking into account the outcome of the Employment Land Review. If the proposed site was to be granted consent this would prejudice the proper planning of the area.

The draft RSS does not yet form part of the development plan for the area. The policies within the RSS may be altered significantly by the Government's response to the Panel's Report. Development Control decisions should therefore not be based on its content. Instead its draft provisions will be taken into account in the provisions of the Local Development Framework as it is being prepared. In fact policy RE2 on employment and land provision refers to the preparation of Local Development Documents as the vehicle for implementing its provisions. Therefore even if the policy was to be adopted it would not be directly relevant to this application. It should also be noted that there is no specific reference to the need for employment land at Grove in policy CO5 on the Central Oxfordshire economy or in its supporting text.

The Panel's Report on the draft South East Plan makes specific reference to Wantage/Grove at 22.24 but only in terms of "stimulating growth at the **established research and business parks** between Didcot and Wantage/Grove". The specific recommendation made at 22.2 must be read in the context of this statement.

Would you like me to return the pile of documents?

Regards

Peter Williams

Principal Planning Officer

Development Policy

Planning and Community Strategy

Vale of White Horse District Council

Tel - 01235 520202 ext 502. Fax - 01235 547624

# APPLICANTS RESPONSE TO POLICY OFFICERS COMMENTS.



AP/CIR.M.0100

18<sup>th</sup> June 2008

Ms Laura Hudson
Planning Department
Vale of White Horse District Council
PO Box 127, Abbey House
Abbey Close
Abingdon
Oxfordshire
OX14 3JE

VALE OF WHITE HORSE DISTRICT COUNCIL RECD 1 9 JUN 2008 CORPORATE POSTAL SERVICES - 5

Dear Ms Hudson,

#### REY CONSTRUCTION LIMITED LAND NORTH OF BELLINGERS GARAGE, GROVE, OXON APPLICATION REF. NO. GRO/20495

At our recent meeting you provided me with a copy of the comments received from your policy colleague in respect of the above application. These comments outline various policy objections to the application proposal but pay little or no regard to more recent national policy advice which we refer to in the supporting statement. Effectively the comments are largely based around the fact that the Local Plan makes no direct provision for development outside the District's settlement development boundaries. As explained during the course of our meeting there are, in this case, numerous material planning considerations which you must weigh against the alleged policy conflicts in determining the application.

Firstly, as you are aware, the Vale of White Horse Local Plan was adopted almost two years ago following the Local Plan Inquiry (LPI) held between May and September 2005 and the Council's subsequent consideration of the recommendations set out within the LPI inspector's report received in February 2006. Since adoption of the Plan, emerging policy at both the national and regional levels has highlighted the importance of improving the self-containment of settlements by achieving a better balance between the number of jobs available and the economically active population. In particular, draft PPS4 refers to the importance of the planning system in delivering economic development in a way which is sensitive to the challenges of climate change. It also refers to the need to treat applicants for economic development favourably unless social and environmental costs outweigh benefits. Paragraph 14 of the companion guide to PPS1 (General Principles) confirms that such emerging policy, in the form of draft policy statements and guidance, can be regarded as material considerations. Their existence may indicate that a relevant policy is under review and the circumstances that led to that review may need to be taken into account in determining planning applications.

Despite the need to take account of wider circumstances, the policy response to the application proposal makes no reference to the fact that Grove has a very poor and deteriorating level of self-containment. This is evidenced by the travel to work data set out at length within the planning supporting statement and confirms

AP/CIR.M.0100

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**APPENDIX 3** 

Pegasus House
Querns Business Centre
Whitworth Road
Cirencester
Gloucestershire
GL7 1RT





Aiso at: Birmingham Bracknell Bristo! Cambridge Leeds Nottingham

Pegasus Planning Group LLP is a limited liability partnership registered in England and Wales partnership number OC305545

Registered Office: 6-20 Spitalgate Lane, Orrencester: Gloucestershire. GL7 2DE



that at least 70% of the economically active population at Grove and Wantage are employed at a workplace outside the town. In the meantime, the number of locally available jobs continues to decline.

Whilst the policy response helpfully confirms that "Policy GS10 [of the Local Plan] aims to direct development to locations where car usage can be minimised..." it also suggests that, as the application site is not within or directly adjacent to Grove, the proposal would be likely to result in greater car usage "...when compared to the allocated employment site at Grove Technology Park...". However, this clearly disregards the already high levels of out-commuting at Grove and Wantage as referred to above and the fact that the Grove Airfield development will generate at least a further 3,000 economically active residents in Grove (an approximately 80% increase) but with no material increase in the amount of employment land. This means that even if both the application site and Grove Technology Park were fully developed for Class B1 uses they could not accommodate the increase in labour supply arising just from the Grove Airfield development (let alone improve its existing poor level of self-containment). Consequently, it is therefore clear that, contrary to the response from your forward plan colleagues, the proposal is fully compliant with the aim of Policy GS10. It will help to minimise the need to travel by car for those who currently have no alternative.

Notwithstanding the above, the references to the availability of land at Grove Technology Park are misleading in that the allocation was carried forward from the previous Local Plan and has therefore already been available for a very long period of time. As referred to within the planning supporting statement, the allocated land does not have the benefit of direct access to the A338 nor any main road frontage. These factors continue to serve as a significant constraint to its development and, in the context of Policy DC11, justify development on the application site despite the fact that it is a mix of Grade 2/3a agricultural land. Furthermore, in view of the guidance within paragraph 24 of draft PPS4 that where "...there is no reasonable prospect of a site being used for economic development within the plan period the employment allocation should not be proposed or retained.." the future of the allocation at Grove Technology Park within the emerging LDF must be in question. Taken overall the lack of suitable employment land within the town warrants a re-assessment of the situation and the release of additional suitable land as is envisaged in paragraph 12 of draft PPS4. It is particularly disappointing that the advice contained in paragraph 29 is not even mentioned in the policy response.

As part of the evidence base in support of the emerging LDF it is acknowledged that the Council have commissioned an Employment Land Review which is still in preparation. This is implied to be reasonable grounds for refusing the application as premature and that the proposal should instead be advanced through the LDF process. However, Government guidance on prematurity is clearly set out within paragraphs 17 and 18 of the Companion Guide to PPS1. Specifically, it is stated within paragraph 18 that:-

"Where a DPD is at the consultation stage, with no early prospect of submission for examination, then refusal on prematurity grounds would seldom be justified because of the

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#### delay which this would impose in determining the future use of the land in question."

The District Council's Local Development Scheme (LDS) confirms that the consultation stages of the Site Allocations DPD are not expected to commence until early 2009 with the submission document not expected before mid-2010. Furthermore whilst the proposal is not of a strategic scale, the submission draft of the LDF Core Strategy (which will indicate the broad locations of future development), is not likely before the latter part of 2009. In this context it is clear that there are no reasonable grounds for refusing the application as premature.

We also note that the response relies on Policy GS2 which effectively states that all development outside the development boundary will be resisted unless it has been identified for development. We do not see this type of policy fitting within the approach now recommended in draft PPS4 and indeed it appears that the District Council do not even apply this policy strictly to the general area north of Grove. By this we mean that the District Council is now understood to be pressing the developers of the land West of Grove to include within the impending application for 2500 dwellings a new link road to the north of the settlement which will undoubtedly change the character of this area substantially. You may not be aware that we attended the last local plan inquiry arguing for the prior need for this road but were informed that the District Council did not see this as necessary until the second or even third phase of the development. Consequently the road is not shown in the Local Plan and its construction would clearly not comply with Policy GS2. The fact that the District Council are apparently prepared to side step this issue not only demonstrates a considerable degree of inconsistency but also ignores the fact that the road will alter this general area irrevocably (a fact which the District Council seemed at pains to avoid at the local plan inquiry). That it should now be coming forward sooner than was anticipated at the local plan inquiry is not even tacitly acknowledged by your colleague.

As regards the recreational element of the proposal, the policy response implies that demand for recreation arises entirely from residential development. This view contrasts with the guidance in PPG17 which confirms that provision should be made for local sports and recreational facilities where planning permission is granted for new developments. In view of the fact that there is a shortfall in sports pitch provision within the Grove area, it is likely that unmet local demand currently results in journeys to other facilities outside of the town. Therefore, contrary to the policy response, increasing local provision is consistent with the requirement in Policy GS10 to minimise car usage.

For the reasons set out above together with the evidence provided within the ES and supporting planning statement submitted with the planning application, the weight of 'other material considerations' relevant to the proposal are, in our view, sufficient to set aside the policy objections identified. Moreover, there is a fundamental need for the proposed development to come forward now. To delay the inevitable requirement for the provision of additional employment land in the Grove area by waiting for specific LDF allocations will only exacerbate the currently unsustainable travel to work patterns and harm the potential for

AP/CIR.M.0100



economic growth of the area contrary to national and regional planning and economic policy.

Yours sincerely,

Andy Pywell Associate

Email: andy.pywell@ppg-llp.co.uk

cc: Andrew Wilson - Rey Construction Limited

Please Reply to:

Swindon

OBJECTION FROM GROVE TECHNOLOGY



Your Ref:

Our Ref:

Date:

13 May 2008

TAG/kc/C2418

Ms Laura Hudson Planning Department Vale of White Horse District Council PO Box 127, Abbey House Abbey Close **ABINGDON** Oxfordshire **OX14 3JE** 

Town Planning Development Environment Architecture Urban Design Landscape Design VALE OF WHITE HORSE Project Management



Dear Ms Hudson

#### Re: Proposed B1 space and playing fields North of Bellingers Garage, Grove (98/00527/OUT)

I am writing to raise objections to the above planning application on behalf of Grove 2000 Plc, the owner of Grove Technology Park. I should be grateful if you would confirm when this application is to be considered by the Planning Committee.

My client has seen a copy of the leaflet distributed by the applicant and we have examined the application and all the accompanying documentation. The obligations raised to the proposal, fall under the following headings.

- Development Plan Policy.
- Other Material Considerations including.
  - Impact on local economy.
  - Impact on local ecology.
  - Impact on transport matters.

#### 1. Development Plan Policy

The site which is the subject of the current planning application is agricultural land which lies outside the development boundary for Wantage / Grove. The proposal therefore is in conflict with the following policies:

POLICY GS1. Which states that development should be concentrated in the main settlements of Abingdon, Botley, Faringdon, Grove and Wantage, ...... which are defined by the development boundaries on the proposals map.

POLICY GS2. States that outside the built up areas of existing settlements, new development will not be permitted unless it is on land which is identified in the Local Plan or is in accordance with other policies. The site is not identified for any purpose other than agriculture.

#### Cont/d.... Swindon

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INVESTOR IN PEOPLE



TAG/kc/2418 13 May 2008



POLICY E9. States that development for business purposes on sites not identified in the Local Plan will be permitted provided:

- The site is within the development boundary of Wantage / Grove.
- Is for a small firm requiring no more than 500m² of gross floorspace in a village listed in Policy H11.
- Outside all settlements is for the expansion of an existing firm.

It is apparent that the proposal conflicts directly with these policies and must, therefore, as a matter of principle be objectionable.

In relation to such "in principle" objections, I would also add that it would usually be expected that a proposal of this scale would be advanced through the Local Plan process (now LDF).

No substantive evidence has been put forward demonstrating a lack of employment land or any other compelling material consideration why planning permission should be granted. A study on employment land has been undertaken by the applicant's agents, however it falls short of the process recommended in Government advice in "Employment Land Reviews: Guidance Note" and the conclusions flowing from a flawed methodology are open to doubt. Furthermore no sequential test has been submitted justifying the site location, which is outside of Grove, and away from the main centre of population and services in Wantage.

The applicant considered the Inspector's Report into the Local Plan 2011 however, paragraph 11.5.9 page 288 was not examined. This gives consideration a proposal for allocating 2ha of land on the east side of the A338. The Inspector concluded that:

"The site is not particularly well related in walking or cycling terms to either the existing built-up area of Grove, or the proposed western expansion area at present. In the absence of any overriding need for new employment provision in this location, I agree with the Council that there is no justification for such an allocation in this plan period".

"It would result in the unnecessary loss of over 2ha or productive farm land and the significant and potentially intrusive extension of built development into the open countryside to the east of the A338".

This current application seems to rely heavily on the allocation at Grove Airfield, there is considerable doubt now when development would commence. Importantly, the Local Plan Inspector considered proposals to allocate more employment land which was immediately adjacent to the housing site, but found that at present there was no need.

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#### 2. Other Material Considerations

#### Assessment of need for additional commercial floorspace

The study on Demand and Supply of Commercial Property does not appear to have been done in accordance with Government advice given in "Employment Land Reviews: Guidance Notes". It would seem that this study pre-empts the Vale of White Horse District Council Employment Land Study which is currently being undertaken and which will be more thorough and follow a recognised procedure and allow the Council to make a proper judgement.

Considerable emphasis is put by Savills on the lack of available freehold serviced plots direct to businesses. In particular it is noted that MEPC retain buildings as investments (para 4.3), however, these landowners are willing to build specialised buildings to meet tenants' needs. Unlike the residential market ownership of commercial buildings should be given little weight as long as supply is not being prevented due to constraints caused by issues of ownership. Given the range of occupiers on Milton Park it is evident that there is considerable flexibility and business needs are being met.

It is noted at 5.19 that the Steventon Storage may be closed if the reservoir scheme is allowed. However, given supporting text to Policy E15 (Steventon Storage Depot) of the Adopted Local Plan at 11.90 which states:

"This would involve aiming to identify an alternative, more sustainable replacement site (or sites) for business development in recognition of the Steventon Storage Facilities lawful status as a site for B8 uses".

It would seem likely that even if the Steventon Storage Facility is lost it would be replaced.

It is noted at 3.2 that "in many instances businesses have shut down or relocated from the area rather than acquiring new premises in the Grove / Wantage area". There are many reasons that a business may close or relocate, the lack of suitable property being one of many. This is not analysed in any depth and is purely anecdotal.

#### ii) Impact on the Local Economy

The applicant claims that this development would encourage new high-technology firms to locate at Grove because of proximity to the Williams F1 factory. However, this assertion is not backed up with any evidence of similar developments adjacent to the premises of other motor-racing teams. Indeed, teams such as McLaren, Bennetton, Renault have traditionally required sites which are prestigious and free-standing, and which do not form part of a larger "Business Park".

Williams F1 relocated from Didcot in order to achieve this result and seems highly unlikely that the team would welcome a new Business Park

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development in such close proximity. Indeed, there must be a risk, were the development to proceed, the Williams team would consider seriously the possibility of relocation.

If the Local Plan Inspector, and the District Council are correct in asserting that there is no need for more Business floor space, then that will be confirmed through the Employment Land Review, which is both a qualitative and quantitative assessment. This proposal is clearly premature in advance of the outcome of that Study.

#### iii) Impact on Local Ecology

At 6.4.45 of the Environmental Statement Letcombe Brook is recognised as being of high ecological value within the local context as it forms a distinct wildlife corridor of high quality habitat, including the watercourse and associated features, capable of supporting a range of species. It is noted at 6.4.46 that the potential exists for minor impacts to take place in the form of run-off entering the Brook during the construction and post constructional phase. However at 11.4.9 it is stated that:

"the potential contamination of surface and groundwater during site preparation and construction phases (including Earthworks) is classed as temporary and of moderate adverse impact"

and with reference to when the site becomes operational it is stated at 11.4.13

"surface water pollution is considered to be a temporary impact, but is considered to be of moderate significance due to the nature of pollutants which could enter the water course".

It would seem to follow that given it is noted at 6.3.16 that the water quality is relatively good there would be the potential for more than minor impacts caused by pollutants from run off during heavy rain.

#### iv) Impact on Transport Matters

The additional access on to the A338 would seem to cause issues of highway safety and also congestion as it is too close to both the Williams F1 access and the access and egress from the Bellingers site.

The Design and Access Statement states that the vision is for a prestigious office or R&D Development, this is not taken into account in the TRICS data. Appendix D of the Transport Assessment lists the 4 developments on which the data is based (two are Council Offices one is a DIY Company HQ). If the proposed use is to be relatively specialised, it is more likely workers will be located further from the site, travel further than average to work and therefore travel by private transport.

In calculating the TRICS data car ownership of 1.1 to 1.5 cars within 5 miles is assumed. However, within Grove ward according to the 2001 census there

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were 2,841 households and 4,259 cars giving 1.4991 cars per household. Given that this is near the top of the range there may be an under estimation of trips.

Planning Policy Guidance (PPG) 13 – Transport advises at paragraph 75 that walking is the important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2km. Given that the development is largely justified by the Grove Airfield allocation, it seems unsustainable that the proposed development is 2km or more away. A sequential assessment does not appear to have been submitted as part of the application.

From figure 5 (Pedestrian Isochrome Plan) it is apparent that it would take 15-20 minutes to walk to the shopping parade at Millbrook Square or over 30 minutes to the Grovelands shopping centre. It seems unlikely that many people would be prepared to take this time in a typical 1 hour lunch break to access these facilities. It is more likely that workers at the proposed development would use private transport to access Grove and this would contribute to parking problems.

For all of the reasons set out above, my client objects to this application and urges the District Council to refuse to grant planning permission

Yours sincerely

Tangente

Terry Gashe Consultant

**Development Planning & Design Services Ltd** 

tgashe@dpds.co.uk

# APPLICANTS RESPONSE TO GROVE TECHNOLOGY PARK OBJECTION

AP/ASK/M.100 \*

Your ref: GRO/20495

23rd May 2008

Ms Laura Hudson
Planning Department
Vale of White Horse District Council
PO Box 127, Abbey House
Abbey Close
Abingdon
Oxfordshire
OX14 3JE

Dear Ms Hudson,

REY CONSTRUCTION LIMITED LAND NORTH OF BELLINGERS GARAGE, GROVE, OXON APPLICATION REF. NO. GRO/20495

I refer to the letter submitted by DPDS Consulting on behalf of Grove 2000 plc in respect of the above application. It raises a number of objections to the application proposal on various grounds although, as explained below, the justification for these objections is invariably flawed.

#### Planning Policy Considerations

It is common ground that the adopted Local Plan makes no direct provision for employment use of the application site. However, Section 38(6) of the 2004 Act states that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan <u>unless</u> material considerations indicate otherwise" [my emphasis]

The Vale of White Horse Local Plan was adopted almost two years ago following receipt of the inspector's report in February 2006. Since its adoption there have been material changes in circumstance and emerging policy guidance such that the weight of 'other material considerations' relevant to the proposal are sufficient to set aside any Local Plan policy objections. Paragraph 14 of the companion guide to PPS1 (General Principles) confirms that emerging policies, in the form of draft policy statements and guidance, can be regarded as material considerations and that their existence may indicate that a relevant policy is under review and the circumstances that led to that review may need to be taken into account. In this case, all relevant material considerations are explained at length within the supporting planning statement submitted with the application and include:-

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- The possible future loss of another major employer (Crown Packaging (UK) plc) from the area. The Local Plan acknowledged that the existing employment base of Wantage and Grove is vulnerable to such losses.
- The fact that allocated land at Grove Technology Park has still failed to attract any prospective purchasers due primarily to its poor location and access constraints. However, this does not reflect the absence of any need or demand, nor disguise the poor self-containment of the existing settlement. The planning supporting statement identifies that at least 70% of economically active residents of Grove and Wantage travel elsewhere to work.
- The fact that despite the WAGASTS study, there is still no evidence to suggest that improved public transport opportunities will materially reduce the high number of car-based journeys.
- Publication of draft PPS1 Climate Change Supplement (December 2006). This sets out how spatial planning should contribute to reducing emissions and deliver patterns of urban growth that help secure the fullest possible use of sustainable transport and overall reductions in the need to travel.
- Publication of draft PPS4 (December 2007) recognises that it is important for LPA's to maintain a flexible approach to the supply and use of land. LPA's should plan to encourage economic growth and maintain a good supply of land and buildings that offer a range of opportunities and shape travel demands. Moreover, LPA's should consider favourably proposals that do not have the specific support of plan policies unless there is good reason to believe that the economic, social and/or environmental costs of development are likely to outweigh the benefits.
- Publication of the Regional Economic Strategy (October 2006) which
  adopts the principle of 'Smart Growth' but identifies that the physical
  development of land is of key importance to smart growth since
  businesses need an adequate level of land supply. Furthermore, it
  specifically acknowledges that the location of industrial and
  commercial space in relation to housing is vital in order to improve the
  sustainability of communities, reduce congestion and stem the
  emergence of dormitory towns and villages.
- Publication of the RSS9 EiP Panel report (August 2007) which concluded that insufficient support is given to economic growth in the submitted RSS which should also be more explicit about the aim to improve the self-containment of country towns and the need for a better match between new jobs and new labour supply.

It is further implied within the objection letter that the application is premature and that the proposal should have been advanced through the LDF process.

However, Government guidance on prematurity is clearly set out within paragraphs 17 and 18 of the Companion Guide to PPS1. Specifically, it is stated within paragraph 18 that:-

"Where a DPD is at the consultation stage, with no early prospect of submission for examination, then refusal on prematurity grounds would seldom be justified because of the delay which this would impose in determining the future use of the land in question."

The District Council's Local Development Scheme (LDS) confirms that the consultation stages of the Site Allocations DPD are not expected to commence until early 2009 with the submission document not expected before mid-2010. Furthermore, whilst the proposal is not of a strategic scale, submission of the LDF Core Strategy is not likely before the latter part of 2009. In this context it is clear that there are no grounds for refusing the application as premature.

References within the supporting planning statement to the Inspector's consideration of the application site within the context of the last Local Plan inquiry are clearly of material relevance to the current proposal, particularly the Inspector's view that the land between Bellingers Garage and Williams F1 might be better suited to employment development in the longer term. Conversely, the Inspector's dismissal of representations promoting employment use of land to the east of the A338 is simply of no relevance to the application.

The implications of the Grove Airfield development on future labour supply and the degree of self-containment within the Grove and Wantage area is clearly a consideration of material relevance to the application. However, it is fundamentally wrong to claim that the proposed development is reliant upon it. As explained within the planning supporting statement current levels of self-containment are poor, contrary to the objectives of emerging policy – without the benefit of new employment floorspace provided by the proposal the Grove Airfield development will simply exacerbate this unsustainable pattern of development.

#### The Need for Additional Commercial Floorspace

The Savills report on the demand and supply of commercial property submitted with the application provides a wealth of evidence in support of the application proposals. It is criticised by DPDS for not adopting the process set out within the guidance note on employment land reviews published by Communities and Local Government. However, the objection disregards the fact that the guidance note is aimed specifically at local planning authorities and its purpose is to provide them with the tools to assess the demand for and supply of land for employment as an integral part of the preparation of Regional Spatial Strategies and Local Development Frameworks. The guidance is clearly not relevant to those preparing planning applications for employment development and therefore has no bearing on the Savills report or the District Council's consideration of the planning application. Furthermore, determination of the application proposal will clearly not prejudice the outcome of the District Council's Employment Land

Study as this has only recently commenced and is not due to be published until later in the Autumn.

Whilst it is acknowledged that MEPC at Milton Park are prepared to construct buildings to meet their occupiers specialist needs, it has to be recognised that the ongoing development land supply at the park is finite. New buildings are not constructed to cater for freehold owner occupier requirements and on that basis, supply is prevented to cater for requirements which are in particular freehold led. Furthermore, the range of occupiers at Milton Park is also changing with an increasing emphasis on the science and technology sector. Their web-site confirms that more recently there has been a significant expansion in the computer, R&D, and telecoms sectors, which include a large number of research and biotechnology firms, many of which have spun-off from the universities.

As regards the Steventon Storage Facility, this comprises approximately 500,000sq ft of B8 space on 75 acres which is offered into the market as short-term flexible storage from as little as £2.50 per sq ft. Consequently, it is able to provide valuable short-term additional storage space for local occupiers under pressure for space. Notwithstanding support within the Local Plan to identifying replacement(s) for this site, it is highly unlikely that it will be economically viable to do so and enable the same function to be fulfilled.

Finally, it is accepted that businesses shut down and do not re-locate for a variety of reasons. Crystalox for example quite clearly took the decision to relocate to Milton Park in preference to the only option that would have been open to them at the time and in the immediate vicinity of their Wantage premises – Grove Technology Park. The company continues to expand at its premises on Milton Park.

#### Impact on the Local Economy

Williams F1 is a recognised world brand and occupies what they describe as a 40 hectare "technology campus" to the north of the application site. It is a common fact that science and high technology businesses tend to cluster, as demonstrated clearly by the 'bio-cluster' map incorporated within the Savills report. The proximity of highly qualified staff in the vicinity, evidenced by the businesses already established in the area will be of benefit to some occupiers. Nevertheless, the Williams F1 site will be separated from the proposed employment development by a landscaped ecology buffer. This separation will ensure that the Williams F1 facility remains a distinct free-standing operation.

#### Impact on Local Ecology

The DPDS objection includes only highly selective references from the Environmental Statement. Accordingly, it presents an inaccurate consideration of the water quality impacts assessed within the ES document together with inappropriate speculation about the resultant impacts on water quality. The objection has completely failed to include appropriate reference to the proposed mitigation strategies that are integral to the assessment process. Indeed the entire chapters need to be reviewed in full in order to understand the full nature

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of both impacts and the mitigation proposals, where required, which are specifically incorporated to address them.

Section 6.4 of the ES ecology chapter is titled 'Ecological Impacts, Mitigation and Enhancement Opportunities' and, as noted in DPDS's letter, references the ecological value in a local context of Letcombe Brook and the potential for minor impacts. However, paragraph 6.4.48 takes this a stage further in the consideration of the mitigation measures which include the production of a Construction Environmental Management Plan to safeguard the brook. This concludes that given the reduction in agricultural chemical runoff and the retention of the area of flood plan as undeveloped land, over time a positive residual impact would occur in ecological terms.

Section 11.4 of the hydrology chapter is titled 'Main Impacts and Likely Significant Effects' and identifies the predicted impacts from the construction and operational phase of the development <u>prior</u> to additional mitigation proposals which are included within the following Section 11. Specifically, paragraphs 11.5.8 to 11.5.14 note that any potential for pollutant loading would be of minor significance given that SuDS measures are included in conjunction with conventional pollution control measures. Together, these will improve the water quality of the runoff discharges from the on-site drainage to Letcombe Brook.

There is no evidence to suggest that the water quality would be significantly altered from the existing situation and indeed it is assessed from an ecological perspective that ecological benefit would occur as a result of the proposals to this site subject to the inclusion of the appropriate, referenced mitigation strategies.

#### Impact on Transport Matters

Whilst transport matters will be addressed by the County Council in their consultation response, the DPDS objection generally exaggerates the significance of the various points highlighted. Consequently, it is worth reiterating the following points:

- The access on to the A338 has been designed to meet all relevant design standards and, whilst the County Council will comment on the suitability of the junction in due course, there is no reason to anticipate that there will be safety or congestion problems associated with the proposed junction arrangement.
- In terms of the type of development, the transport assessment assesses the trip generation of B1 development situated in an edge of town location. This land use covers a range of office, R+D and commercial uses and therefore includes those proposed on the application site. The end users for the development site are unknown at this time but the transport assessment provides a robust assessment of the trip rates that could be generated. The suggestion that specialist workers are more dependent on the car is non sequitur and cannot be substantiated without considering the site's occupier(s) and taking into account its accessibility by non-car modes of transport. However, it should also be noted that a

travel plan for the site will be implemented, which will reduce reliance on the car.

- The TRICS database identifies that the sites chosen all fall within a car ownership band of 1.1 – 1.5 cars per household. There are no sites within TRICS which have a higher level of car ownership. In any event, the reference in DPDS's letter confirms that car ownership at Grove falls within this range.
- The implication that 2km is an upper limit to walking distance is unreasonable and walking will remain a realistic means of transport from the Grove Airfield site, especially as there will be footway connections between the two sites. The distance between the two sites could in any case be reduced if a pedestrian connection from the western end of the site could be achieved. Furthermore, cycling will also be a perfectly reasonable form of transport between the two sites.
- It is anticipated that a range of staff facilities would be provided on site (such as canteens, cash withdrawal etc). These facilities could be provided as part of the development's travel plan measures. When staff did travel to town, they would be expected to car share, particularly if there are already parking restrictions in the town centre. Together, these measures would minimise the traffic impact on Grove town centre at lunch-times.

It is clear from the above that the objections raised by DPDS on behalf of their clients are flawed and the fact remains that there is a fundamental need for the proposed development to come forward now. To delay the inevitable requirement for the provision of additional employment land in the Grove area by waiting for specific LDF allocations will only exacerbate the currently unsustainable travel to work patterns and harm the potential for economic growth of the area contrary to national and regional planning and economic policy.

Should you require any further information in respect of the matters referred to in this letter then please do not hesitate to contact me.

Yours sincerely

Andy Pywell Associate

Email: andy.pywell@ppg-llp.co.uk

Please Reply to:

Swindon

OBJECTION FROM BELLINGERS GARAGE

Our Ref:

TAG/vw/C22011

CONSULTING

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Town Planning Development

Environment Architecture

Urban Design

Landscape Design

Project Management

Development Planning &

Company Secretary: I. James, BSc (Econ), FCA.

Subsidiary Companies:

**DPDS Regional Ltd** 

**Development Planning &** Design Services Ltd

Directors:

L. M. Durrant, FRICS, Dip TP, MRTPI, MinstD.

M. Smith, BSC (Hons), MRTPI.

P.F. Thair, BSC (Hons) Dip TP, MRTPI, MI Env Sc.
Associate Directors:

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S. Whitfield, BA(Hons), MPIII, MRTPI.

Consultants:

T. A. Gashe, BA (Hons), MA, MRTPI.

P. M. Griffiths, BSC Hons, ML.

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**DPDS Architecture Ltd** 

R. Plackett, BA Dip Arch, RIBA FRSA. P. M. Griffiths, BSc Hons, ML Company Registration N° 2937191 Registered Office of All Companies:

Old Bank House, 5, Devizes Road, Old Town, Swindon, Wiltshire, SN1 4BJ. www.dpds.co.uk

Design Services Group Ltd

Group Managing Director: L. M. Durrant, FRICS, Dip TP, MRTPI, MinstD.

Your Ref:

9 June 2008

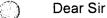
Date:

 Director of Planning and Community Strategy Vale of White Horse District Council

P O Box 127 Abbey House Abbey Close **ABINGDON** Oxfordshire **OX14 3JE** 



**FAO Miss Laura Hudson** 



#### Outline application for mixed use Class B1 development, open space and piaying fields with associated changing and car parking facilities Ref: GRO/20495-X

I have been instructed by my client M.M. Bellinger & Sons (Bellingers) to write to you in relation to the above planning application.

I have examined the application and all accompanying documentation including the Environmental Statement. My client wishes to object to the proposed development primarily in relation to the proposed means of access to the site.

My client considers that an access in the position shown on the illustrative master plan would create unacceptably dangerous conditions on this section of the A338.

The spacing of access points along this part of the A338 would have a serious impact on the free-flow of traffic along the road and would be unsafe. The adopted Local Plan contains references to a new access south of my clients' site which would be intended to serve the proposed residential development on Grove Airfield. If this were to be implemented it would create a situation where there are 4 separate access points, all capable of carrying significant traffic flows, within the space of about 200m. Furthermore, the Williams roundabout has been designed to accommodate a fourth arm which could provide access to a re-opened railway station at some future date.

Cont/d....

## **APPENDIX 4**

INVESTOR IN PEOPLE



Swindon

Old Bank House 5 Devizes Road Old Town Swindon Wiltshire SN1 4BJ Tel: 01793 - 610222 Fax: 01793 - 512436 dods.swindon@dods.co.uk Bristol

Redmayne House 4 Whiteladies Road Clifton Bristol BS8 1PD Tel: 01179 - 466882 Fax: 01179 - 467462 nail: dpds.bristol@dpds.co.uk Crawley

7 The Courtyard 7 The Courtyard East Park Crawley West Sussex RH10 6AG Tel: 01293 - 616112 Fax: 01293 - 616102 nail: dpds.southeast@dpds.co.uk Derby

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Tel: 01332 - 206222 Fax: 01332 - 206012 email: dpds.central@dpds.co.uk Page 2 9 June 2008 TAG/vw/C22011



Director of Planning and Community Strategy Vale of White Horse District Council

Bellingers are also concerned that a new access which would be less than 100m from the existing egress to their site would have an adverse impact on the operation of their business both as a car dealership and as a petrol-filling station.

The proposed development is not in accordance with the Development Plan and there are no material circumstances that indicate that a decision should be made other than in accordance with the Development Plan. For the reasons set out above my clients consider that the application should be refused.

Yours sincerely,

T Gashe Director

**Development Planning & Design Services Ltd** 

tgashe@dpds.co.uk

Our ref: GCC/PW/N/11500964/Hudson

APPLICANTS RESPONSE

TO BELLINGERS GARAGE

24 June 2008

Ms L Hudson
Director of Planning and Community Strategy
Vale of White Horse District Council
PO Box 127 Abbey House
Abbey Close
Abingdon
Oxfordshire
OX14 3JE

WSP Development and Transportation

C) 6.08

Unit 9 The Chase John Tate Road Foxholes Business Park Hertford SG13 7NN

Tel: +44 (0)1992 526 000 Fax: +44 (0)1992 526 001

www.wspgroup.com

Dear Ms Hudson

Outline Application for Mixed Use Class B1 Development
Open Space and Playing Fields with Associated Changing and Car Parking Facilities
Reference – GRO/20495 - X

I refer to the letter to you dated 9 June 2008 from Terry Gashe at Development Planning and Design Services Limited. In his letter, Mr Gashe makes the following highways related statements:

- 1. The proposed access would create unacceptably dangerous conditions on the A338;
- 2. The spacing of access points would have a serious impact on the free flowing of traffic and would be unsafe;
- 3. The proposed West Grove access junction, and the Williams roundabout fourth arm, together would create four separate access points all capable of carrying significant traffic flows; and
- 4. The proposed new access would have an adverse commercial impact on the Bellinger car dealership and petrol filling station.

I address each of these points in turn below but would comment initially that the objector's agents are not highway consultants nor do they cite any breach of highway standards..

1. The proposed access would create unacceptably dangerous conditions on the A338

The new access junction will be designed to conform to Highway Design Standards. It will be situated 100m north of the Bellinger petrol filling station's northernmost access, and this spacing is entirely appropriate for the speed of traffic on this section of the A338. Furthermore, there will be good inter-visibility between the new access and the PFS access to the south, and the Williams roundabout to the north. Traffic will be prevented from turning right from the new access onto the A338; this will prevent development related traffic from impeding traffic leaving the Williams roundabout. There are no reasons to suggest that this arrangement will present an unacceptably dangerous situation for road users.

Ms L Hudson Director of Planning and Community Strategy Vale of White Horse District Council 24 June 2008 Page 2



2. The spacing of access points would have a serious impact on the free flowing of traffic and would be unsafe

As stated above, the proposed access will be designed to conform to Highway Design Standards. Traffic will be prevented from turning right out of the new access in order to prevent it impeding the flow of traffic travelling south along the A338. The A338 at this location is within an urban environment. The proposed junction's configuration is appropriate for this type of situation and will neither have a serious impact on the free flow of traffic nor will it have an adverse effect with respect to road safety.

3. The proposed West Grove access junction, and the Williams roundabout fourth arm, together would create four separate access points all capable of carrying significant traffic flows

Mr Gashe mentions both the proposed West of Grove access junction and the possible fourth arm from the Williams roundabout. Both of these junctions were discussed with Oxfordshire County Council at our meeting with them in December 2007. I understand that proposals for the West of Grove access junction are at a very early stage. Clearly, the design of this access will have to reflect predicted traffic movements and local road conditions. As we state in the transport assessment, the proposed development access is entirely independent of access arrangements for the West of Grove site. I should also point out that the local plan does not stipulate that the West of Grove access should be situated to the south of his client's site, but merely refers to it being provided to the north of Grove.

With respect to the Williams roundabout, the County Council has indicated that there are no proposals to provide a fourth arm to the railway station and we understand that Williams Engineering for whom Mr Gashe also acts have declined to put in this link. As such a fourth arm is unlikely to be provided in the foreseeable future.

4. The proposed new access would have an adverse commercial impact on the Bellinger car dealership and petrol filling station

As stated above, the new access will be situated 100m to the north of the PFS access. It will not affect access or egress arrangements for the car dealership and petrol filling station. It is difficult to understand why Mr Gashe considers that the proposed access would have an adverse commercial impact on the Bellinger's site but in any event this is not a planning issue.

I note that this is the second occasion that Mr Gashe has written to you on behalf of his various clients, alleging that the proposed access arrangements compromise highway safety. You will be aware that on neither occasion has he provided any evidence to substantiate these views.

Ms L Hudson Director of Planning and Community Strategy Vale of White Horse District Council 24 June 2008 Page 3



I suggest that Mr Gashe's views on highways matters can be safely put to one side, and that you should refer to Oxfordshire County Council for guidance on highways related matters.

I trust that the above is useful to you.

Yours sincerely

Gerry Corrance
Technical Director

cc M Dobson - Pegasus Planning

STONELEIGH

ASJ/SH/JG18 24th June 2008

Ms. L. Hudson Department of Environment and Planning Vale of White Horse District Council Abbey House Abingdon Oxfordshire OX143JE

LANDOWNERS TO SOUTH OF THE SITE BECCO 3 8 JUN 2008 CORPOLATY FOSTAL

**APPENDIX 4** 

OBJECTION FROM

Dear Ms. Hudson,

#### **OUTLINE PLANNING APPLICATION REF 08/00527/OUT**

#### LAND NORTH OF BELLINGERS GARAGE, GROVE, OXFORDSHIRE

#### **REY CONSTRUCTION**

#### MIXED USE DEVELOPMENT: 17,300 M<sup>2</sup> OF B1 FLOORSPACE TOGETHER WITH OPEN SPACE, PLAYING FIELDS AND ASSOCIATED FACILITIES.

Stoneleigh Planning act for JJ Gallagher and Gleeson Developments who control land at Monks Farm, to the north of Grove. The eastern part of this site lies directly to the south of the above noted application.

Our clients are presently promoting the residential development of the land at Monks Farm through the relevant Development Plan Documents that will comprise the LDF for the District. The proposals include the construction of a link road from the A338 to the former airfield west of Grove which is allocated for housing development in the adopted Local Plan. The plan requires that the link road should be in place before more than 1500 dwellings have been completed at the airfield.

We have examined the outline planning application for the development of the land to the north of Bellinger's Garage and considered the supporting documentation. We have also looked at the policies set out in the Development Plan for Grove which consist of the adopted Oxfordshire Structure Plan and the Vale of White Horse Local Plan in relation to the proposed development.

> Kingsley House, 63 Holly Walk, Leamington Spa. Warwickshire CV32 49G

On the basis of our findings JJ Gallagher and Gleeson Development have instructed us to lodge their objections to the proposals based on the reasons as set out below;

#### **Development Within and Adjacent to Settlements**

1. The site lies beyond the Development Boundary to Grove/Wantage as shown on the Local Plan proposals map (Grove and Wantage inset) and Policies GS1, GS2, H10, H19 and E9 of the plan apply. The site also falls within the Lowland Vale area to which Policy NE9 applies.

Policy GS1 is the General Locational Strategy of the plan, which states that development is to be concentrated in the five main settlements of the District including Grove. The settlements are defined by the Development Boundaries shown on the proposals map. Because it lies outside the boundary to Grove, the proposal therefore does not accord with the overall locational strategy of the plan.

- 2. Policy GS2 is also relevant to the consideration of the application. This states that new building will not be permitted in areas beyond the development boundaries unless it is on land which has been identified for development in the Local Plan, or is in accordance with other policies with particular reference to Policy GS6 (Redevelopment of Existing Buildings) and E9 (see below) and E16 21 (New Buildings for Agricultural Purposes). The application meets none of these policy exceptions.
- 3. Policies H10 and H19 do not apply to the proposals since these deal with residential development.
- 4. Policy E9 deals with sites for business purposes, on land not identified under the specific proposals of the Local Plan. Development would only be allowed if it were;
  - a. On a site within the Development Boundary of the Five Main Settlements as referred to above.
  - b. Is for small firms requiring no more than 500m<sup>2</sup> gross floorspace.
  - c. A form of development that would not generate a demand for housing that cannot be met by existing or planned provision.
  - d. A proposal for the expansion on site of an existing business whose linkages make the specific location necessary, unless the enterprise is known to be unneighbourly.
- 5. The application proposals meet none of the above noted defining criteria.
- 6. A number of County Structure Plan policies must also be taken into account in the consideration of this proposal.

- 7. Policy G1 sets out the General Strategy of the Plan which is, inter alia, to make the best use of previously development land and to reduce the need for greenfield sites. Most development will be concentrated within and adjoining the main urban areas, where housing and jobs will enjoy a close proximity to each other and to shops, services and other facilities. The proposed development is located on a greenfield site that is not adjacent to the urban area of Grove and which, therefore, does not provide for the close proximity of the new jobs to existing and proposed areas of new housing.
- 9. Policy G1 also requires that development should be located where the need to travel by private car can be reduced and walking, cycling and the use of public transport can be encouraged. Whilst there are footways either side of the road network within the site (which could be widened to incorporate cycleways), the only footpath link into the site is from the footway in the margin to the A338 from Grove. There is no existing cycleway route nor is one proposed. The development proposals include a car parking space for every 30 m² of floorspace.
- 10. Based on the above aspects of the development, it is considered that the proposals will not offer the prospect of reduced levels of private car use in favour of walking or cycling trips to work. The proposal is therefore contrary to this aspect of Policy G1 and also Policy G2 which seeks designs that encourage the use of walking, cycling and public transport, as alternatives to the car. The proposals therefore also fail to give emphasis to the needs of pedestrians, cyclists and public transport as required by Policy T1.

#### Open Space/Recreation Uses

- 11. Approximately 4.3ha of the total site area would be developed for employment uses, the remainder comprising the open area to the north, within which there will be a number of balancing ponds, and to the west, in the floodplain of the Letcombe Brook where it is proposed to provide sports pitches and associated changing facilities, together with road access and car parking. This land is not allocated in the Local Plan for Open Space or Recreational Uses.
- 12. Para 4.32 of the Planning Statement that accompanies the application states that there is a shortfall of sports pitches in Grove as measured against a standard of 1.6ha per 1,000 population. That standard is maintained in the more published Draft SPD Open Space Sport and Recreation Future Provision. However, the latter does state that most pitches should be within walking distance of most potential casual users and this is the primary accessibility standard.

- 13. Whilst the proposed pitches would be within 900m of the housing on the north side of Grove, it is no part of the proposals that the existing footpath along Letcombe Valley will provide direct access to the pitches (via the track to Grove Wick Farm). In the absence of such provision, then the proposed pitches could only be accessed for pedestrians, from Grove via the footway alongside the A338 and the estate roads to the employment area. This route would be over 900m.
- 14. Within the development of the airfield site, west of Grove, provision is to be made for 11.25ha of playing fields for outdoor community sport (para 6.20 SPD Former Airfield West of Grove). This will more than meet the requirements for the new development of 2500 dwellings and a resident population of some 6000 persons (6 x 1.6ha = 9.6ha). These proposed facilities will be within walking distance of most residents in Grove and the new households on the airfield site. They will also redress, in part, the presently recorded shortfall in playing pitches.
- 15. Accordingly, we consider that the proposed sports pitches are:
  - a. Inconveniently located beyond the 900m recommended walking distance for participants. (See Appendix A. page 36. Draft SPD Open Space, Sport and Recreation Future Provision)
  - b. Unlikely to attract users other that those making the journey by car, contrary to efforts to reduce dependence on the private car for local journeys.
  - c. Not required to meet the needs of the planned growth of Grove or to redress the shortfall in provision which will be overcome by the development of the former airfield.
- 16. In conclusion, therefore, my clients would submit that because the proposal conflicts with the relevant policies in the Statutory Development Plan, planning permission should be refused. The site is not allocated for employment development. Nor does it meet the qualifying criteria for development of this nature outside the defined built up area of Grove. The proposed sports pitches are inconveniently located in relation to the existing housing in Grove, whilst the development of the allocated site at the former airfield will provide new pitches that will be accessible to the new and existing housing and will redress most of the current shortfall in pitch provision in the town.

#### **Employment Land Provision**

17. The application is supported by a Planning Statement and an analysis of the supply and demand for Commercial Property. The immediate need for further employment land at Grove is cited by the applicants as an other material consideration that suggests the application should be granted permission. But there is 5ha of employment land at Grove Technology Park which has not yet been taken up and is available for development. There are other sites available at Faringdon, Harwell and Milton Park which are able to address requirements up to 2011 in accordance with Development Plan policy.

\* 18. The needs and demand for further employment land is currently under review by the Council, as part of the preparation of the evidence base for the LDF, which, in turn, will address the emerging policies for the economy in Central Oxfordshire as set out in the South East Plan. The identification and development of a site, such as that described in this application, should, therefore, be promoted via the review of the development plan as will be set out in the District LDF, particularly as the present Local Plan sets out policies and proposals to deal with development needs up to 2011.

#### **Highways**

- 19. As noted in the second paragraph to this letter, the development of the former Airfield site, beyond 1500 dwellings, requires the construction of a new link road to the A338. This would be routed through the land at Monks Farm to the south of Bellinger's Garage. A roundabout junction would be formed on to the A338. The exact position and geometry of this junction remains to be determined.
- 20. The applicants propose to introduce a further access on to the A338 in the form of a standard "T" junction to serve the proposed B1 development and the playing pitches. Together with the existing access and egress at Ballinger's Garage and the future roundabout junction on to the link road, our clients consider that this will give rise to traffic safety issues arising from the spacing between the various junctions.
- 21. In particular, the junction into the employment site is 130m south of the centre line of the roundabout arm that serves the Williams F1 site. This will not allow safe forward visibility for right turning traffic onto the A338 from the application site and off the A338 onto the application site.
- 22. We note the Parish Council's remark that the application site could incorporate part of the northern link road to serve the airfield development. The junction between the link road and the A338 must be in the form of a roundabout. Such a junction could not be established, in accordance with highway design standards along the frontage to the application site given proximity to the Williams F1 roundabout to the north.
- 23. In the long term, should the Council adopt a development plan policy that would provide for the development of the application site for employment uses, then the more appropriate form of access would be from the link road, as Greeson and Gallagher propose and which is show on the attached plan. This shows the more appropriate route and junction onto the A338 for the northern link road to serve the airfield development site and the future planned development to the north of the Grove.

#### **Conclusions**

Gleeson Developments Ltd and JJ Gallagher Ltd therefore object to the proposed development for employment uses and playing fields on land to the north of Bellinger's Garage. The proposed development would be contrary to current development plan policy for Grove as set out in the adopted County Structure and Local Plans. There are no other circumstances surrounding this application that suggest these policies should be set aside in the determination of this application, particularly those relating to the forward supply of employment land as suggested by the applicants. In addition, there are a number of highways/vehicular access issues that are not addressed by the proposals and which cannot be satisfactorily resolved before the route of the northern link is approved by the Council.

The application should therefore be refused.

We should be grateful if you would notify us of your Council's decision in due course.

Yours sincerely,

Mandow J. Jowed.

ALASDAIR JONES

**DIRECTOR** 

