

**LOCAL PLAN 2031 PART 2  
PUBLICATION CONSULTATION**

**Representations  
on behalf of  
Lagan Homes Limited**

**Land East of the A338**



November 2017

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### **Appendix 1 Land East of A338, Site Location Plan**

## INTRODUCTION AND SUMMARY

- i. These representations are submitted By Edgars Limited (Edgars) in response to the Vale of White Horse Local Plan 2031 Part 2 – Detailed Policies and Additional Sites Publication Consultation November 2017 (LPP2).
- ii. They are made by Edgars Limited on behalf of Lagan Homes Limited who have land under their control East of the A338, East Hanney.
- iii. Edgars supports the strategy to address Oxford’s unmet housing needs in locations with good access to Oxford and to deliver additional housing at East Hanney where this will promote a thriving village and community whilst safeguarding the countryside and village character. This accords with the spatial strategy established in the Local Plan 2031 Part 1.
- iv. **Edgars objects to Core Policy 4a** as it is **not justified** and has not appropriately considered reasonable alternatives. Edgars’ objections relate to the Site Selection process and the proposed increase to the windfall allowance.
- v. Edgars consider that the HELAA, Site Selection process and Sustainability Appraisal should be revisited to include Land East of the A338 as a reasonable alternative. Land East of the A338, East Hanney should be allocated for around 90 dwellings.
- vi. **Edgars objections to Core Policy 4a also apply to Core Policy 8a** which is similarly not justified and has not appropriately considered reasonable alternatives.
- vii. **Edgars objects to Core Policy 14a** and the proposed extension of the safeguarding area for the Upper Thames Strategic Storage Reservoir. Core policy 14a is **not justified** by appropriate evidence.

## **1.0 LAND EAST OF THE A338, EAST HANNEY**

1.1 Lagan Homes Limited has land under its control East of the A338 at East Hanney. A site location plan is attached as **Appendix 1**.

### **The site and surrounding area**

1.2 The site comprises approximately 3.8 hectares of relatively flat arable agricultural land which adjoins north eastern edge of the village of East Hanney.

1.3 The west boundary of the site adjoins a relatively straight section the A338 and is relatively open. The northern boundary is also largely open although there are remnants of a hedgerow beyond which is further arable land. The eastern boundary is partly marked by a hedgerow beyond which is arable land.

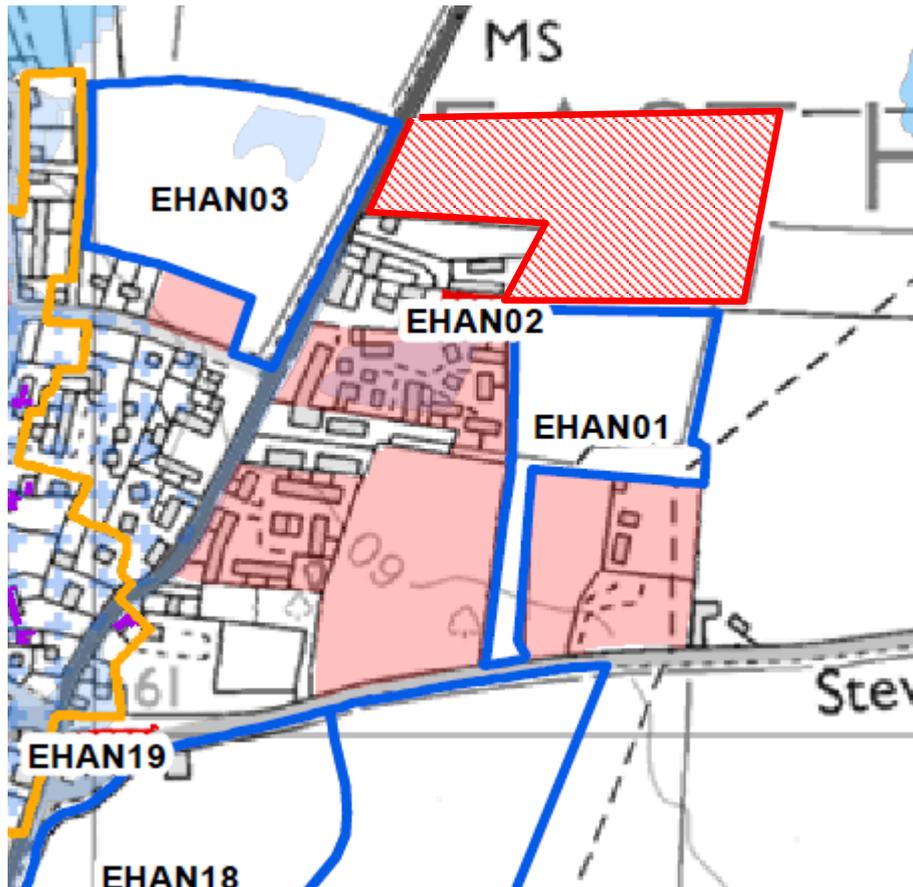
1.4 To the south west the land adjoins a residential dwelling known as Long Acre within a large plot with a number of significant trees within its garden.

1.5 To the south east, the land directly adjoins an area of agricultural land proposed for allocation for 50 dwellings at North- East of East Hanney (SHLAA Reference EHAN01)

1.6 Further to the south of the site are several areas of land which have recently been granted planning permission for housing development adjoining the A338 and Steventon Road. This includes:

- 11/02103/FUL and P13/V2608/FUL – Planning permission for 31 new dwellings south of Alfred’s Place;
- P13/V2619/NM – Planning permission for 25 dwellings on land east of the A338 at Crown Meadow;
- P16/V3226/FUL - Planning permission for up to 40 dwellings at Steventon Nurseries;
- P17/V0532/NM – Planning permission for 39 dwellings on land of the Steventon Road (adjacent to the nurseries).

1.7 These planning permissions are indicated on the East Hanney SHLAA map as the red shaded areas – see extract copied below with the Land East of the A338 also edged red.



**Extract of East Hanney HELAA map  
(East of A338 site shown edged red)**

1.8 The land East of the A338 lies within an area of new residential development to the east of the village. The HELAA map further confirms that the land is not subject to any known environmental constraints as:

- The site is not subject to any Landscape Designations;
- The site is located away from the village Conservation Area and listed buildings and is not subject to any known heritage constraints;
- The site is not subject to any ecological designations – as arable land it is expected to be of low ecological value;
- The site is within Flood Zone 1;
- The site is not crossed by any public rights of way.

1.9 The site lies within the East Hanney to Abingdon lower vale farmland landscape character area. The site is considered to be of limited landscape value as it comprises relatively large scale open fields with a weak landscape structure, variable boundary vegetation and on the edge of an existing settlement and the A338.

- 1.10 Edgars consider that there is potential to enhance the landscape through provision of a new landscape edge to the village on the site's northern and eastern boundaries.
- 1.11 The site lies adjacent to the A338 from which vehicular access will be available. Frequent Oxford-Wantage bus services also run along the A338 with bus stops adjacent to Ashfield Lane within 200m of the site.
- 1.12 The village primary school, hall and community shop are approximately 1.5km – 1.7km in the western part of the village which is within reasonable cycling distance.
- 1.13 The site is not subject to any other known designations although is now understood to fall within the proposed Safeguarding Area for the Upper Thames Reservoir (LPP2 Policy 14a).
- 1.14 Edgars understand that the Upper Thames Reservoir, its scale, exact location and site boundaries are yet to be confirmed. It is understood that Thames Water will be submitting further details to the Government in January 2018 which will be subject to consultation and potentially a public inquiry.
- 1.15 There is no certainty that the land East of the A338 is required as part of the detailed reservoir proposals. The site is insignificant in the context of the scale of the reservoir such that Edgars do not consider the development of the site to represent a significant constraint to the development of the reservoir. It is expected further information on this issue will become available during the course of the LPP2 examination.

#### **Housing and Economic Availability Assessment (HELAA)**

- 1.16 The Land East of the A338 has not previously been submitted to the Council and as such is yet to be included in the HELAA assessment.
- 1.17 Edgars accordingly request that the site is included with any future review of the HELAA.

#### **Site Assessment**

- 1.18 The following table replicates the Council's Stage 4 Site Assessment template which should be applied to the site.

1.19 The site is suitable, available and deliverable. The site comprises 3.8ha. Together with the provision on a new landscape edge, Edgars consider the site has capacity for approximately 90 dwellings.

<b>Table 1 Land East of the A338</b>	<b>Capacity around 90 dwellings.</b>
Landscape	The impacts mainly relate to the loss of an arable field with a weak existing landscape structure and which is not crossed by any rights of way. There is an opportunity to provide a new landscape edge to the village.
Flooding	Fluvial Flood Risk Zone 1 (Low Risk).
Ecology	Arable land of limited ecological value. A small watercourse runs along the eastern boundary with the wider network known to contain water vole.
Historic Environment	Site is distant from any listed buildings and the East Hanney Conservation Area.
Transport including public transport	Existing village facilities including the Primary school, Community shop, Post Office, Village Hall, Play Area and sports facilities lie approx. 1.5km to the west (within reasonable cycling distance)  East Hanney is located on a strategic transport corridor (A338) along which there are set to be enhancements to the bus services given the committed growth at Wantage and Grove. There is a bus stop adjacent Ashfields Road within 200m of the site.
Access	Vehicular access is available to the A338
Water and Waste Water	Drains to Wantage waste water treatment works. Reinforcement of the sewer network may be required.
Public services	The existing primary school (St James) is expanding from 0.5 entry to 1 form entry and a further allocation of this scale can be accommodated.
Other Utilities	Within the proposed safeguarding area for the Upper Thames Reservoir but need for and extent of reservoir is yet to be confirmed. The site is of an insignificant size in relation to the indicative reservoir proposal

	such not to present any significant constraint to its development if required.
Environmental Health	No identified constraints - adjoined by residential development. Potential for some road noise from the A338 which can be mitigated with appropriate noise buffers and detailed design.

## 2.0 CORE POLICY 4a MEETING OUR HOUSING NEEDS

2.1 Edgars supports the strategy to address Oxford’s unmet housing needs in locations with good access to Oxford and to deliver additional housing at East Hanney.

2.2 East Hanney is identified as a large village in the Local Plan 2031 Part 1 and as such is a sustainable location for development consistent with the established spatial strategy to promote thriving villages and rural communities whilst safeguarding the countryside and village character.

3.0 East Hanney is located in relative close proximity to Wantage and Grove and is located on a strategic transport corridor (A338) along which there are set to be enhancements to the bus services to Oxford given committed growth at Wantage and Grove.

3.1 Edgars **objects** to Core Policy 4a as it is **not justified** and has not appropriately considered reasonable alternatives. Edgars objections relate to the Site Selection process and the proposed increase to the windfall allowance.

3.2 As the Site Selection process has informed the Sustainability Appraisal, Edgars also consider that the Sustainability Appraisal is deficient for its failure to consider reasonable alternatives.

3.3 Edgars consider that the HELAA, Site Selection process and Sustainability Process should be revisited to include Land East of the A338 as a reasonable alternative.

### Comparative Assessment of Land East of the A338

3.4 Table 2 below presents a comparative appraisal of the Land East of the A338 against the proposed allocations at North of East Hanney and North-East of

East Hanney. It uses the same traffic light approach as shown in the Stage 4 Site Assessment.

- 3.5 Edgars disputes the assessment of the proposed allocation North of East Hanney and the traffic light assessment has been amended in Table 2 below accordingly (and as marked with \*).

<b>Table 2</b>	<b>North of East Hanney</b>	<b>North-East of East Hanney</b>	<b>Land East of the A338</b>
Landscape			
Flooding	*		
Ecology			
Historic Environment			
Transport including public transport	*		
Access			
Water and Waste Water			
Public services			
Other Utilities			
Environmental Health			

- 3.6 In relation to Flooding, North of East Hanney is identified in the Council’s assessment as having a small area of Flood Zone 2. In accordance with the sequential approach to flood risk, Edgars considers this site should be downgraded to an ‘amber’ rating in this category where there are sites available wholly in Flood Zone 1.

- 3.7 In relation to Transport, the North of East Hanney site has been downgraded to ‘amber’ as it is not within reasonable walking distance of key village facilities including the primary school or village shop. The site is 1.5km to the village shop and 1.7km to the primary school. Land East of the A338 is similarly located and is also given an ‘amber’ rating.

- 3.8 The North of East Hanney site is adjacent to the village Conservation Area which is at least acknowledged in the Council’s assessment of the site. No

comments on the impact of the proposed 80 dwellings on the setting of the Conservation Area are provided.

3.9 It is not apparent that the Council has undertaken any specific heritage appraisal to assess the impact on the setting of the Conservation Area in accordance with NPPF paragraph 129.

3.10 The LPP2 Sustainability Appraisal comments on page 106:

*'North of East Hanney abuts the East Hanney Conservation Area; however, there are no listed buildings associated with this part of the conservation area, and there is some existing screening; furthermore, there are limited views into the conservation area that would be impacted by the development, with views into the conservation area from the A338 being somewhat distant (at least 200m) and partially screened.'*

3.11 The LPP2 Sustainability Appraisal comments on page 109:

*'This site abuts the conservation area, but it is not clear that it contributes significantly to setting.'*

3.12 Edgars agree that the existing dwellings within the Conservation Area can be seen across the site from the A338 albeit the views are filtered by vegetation. Indeed, there is also likely to be views across the site from existing properties in the Conservation Area.

3.13 Undoubtedly there will be some change and harm to the setting of the Conservation Area through the development of 80 dwellings on the Land North of East Hanney. The Council's amber grading of the site against heritage considerations implies some adverse impact. Even if not substantial, in the context of paragraph 132 of the NPPF this should be given 'great weight'.

3.14 It is clear that Land East of the A338 is a more sustainable location for development than the proposed allocation North of East Hanney.

3.15 Edgars consider that the HELAA, Site Selection process and Sustainability Appraisal should be revisited to include Land East of the A338 as a reasonable alternative. Land East of the A338, East Hanney should be allocated for around 90 dwellings.

**Windfall allowance**

3.16 The Site Selection Topic Paper considers a windfall allowance at paragraphs 4.20 to 4.23. This is informed by past rates of windfall delivery as set out in Table 4.3 which is copied below.

**Table 4.3: Completions on small housing sites**

2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total
104	88	99	90	186	448	1015

3.17 The Council is proposing to increase its windfall allowance from 70 dwellings a year to 100 dwellings a year. It is noted that 70 dwellings per year was considered justified following the Local Plan Part 1 examination. The Council appear to now claim the higher figure is justified based on high delivery rates in 2015/16 and 2016/17.

3.18 Edgars do not consider this is justified as during this period (post the publication of the Oxfordshire SHMA in 2014) the Council could not demonstrate a 5 year housing land supply and as such completions on small housing sites are likely to have been influenced by a more permissive approach under the presumption in favour of sustainable development.

3.19 Indeed there is a significant increase in small housing site completions in 2015/16 and 2016/17 which is atypical of previous years which are typically below 100 dwellings per year. This does not provide the compelling evidence required under paragraph 48 of the NPPF to justify an increase to the previously agreed windfall rate of 70 dwellings per year.

3.20 The previously agreed windfall rate of 70 dwellings per year should be maintained.

3.21 As no overall sub area housing trajectory is provided for the combined plan including Oxford’s unmet needs, it is unclear to what extent this reduction in windfall rate will require additional allocations to meet housing requirements.

3.22 If additional allocations are required, Land East of the A338 should be included in the site selection process as a reasonable alternative and allocated for around 90 dwellings.

### **Summary and Conclusion**

- 3.23 Edgars supports the strategy to address Oxford's unmet housing needs in locations with good access to Oxford and to deliver additional housing at East Hanney.
- 3.24 Edgars **objects** to Core Policy 4a as it is **not justified** and has not appropriately considered reasonable alternatives. Edgars objections relate to the Site Selection process and the proposed increase to the windfall allowance.
- 3.25 As the Site Selection process has informed the Sustainability Appraisal, Edgars also consider that the Sustainability Appraisal is deficient for its failure to consider reasonable alternatives.
- 3.26 Edgars consider that the HELAA, Site Selection process and Sustainability Process should be revisited to include Land East of the A338 as a reasonable alternative.
- 3.27 Having regard to the comparative assessment of sites within these representations, it is clear that Land East of the A338 is a more sustainable location for development than the proposed allocation North of East Hanney.
- 3.28 Edgars also consider that the increased windfall allowance is not justified although it is not clear to what extent this may require additional allocations.
- 3.29 Land East of the A338 should be included in the site selection process as a reasonable alternative and allocated for around 90 dwellings.

### **4.0 CORE POLICY 8a ADDITIONAL SITE ALLOCATIONS FOR ABINGDON ON THAMES AND OXFORD FRINGE SUB AREA**

- 4.1 Edgars comments and objections to Core Policy 4a also apply to Core Policy 8a.

## **5.0 CORE POLICY 14A UPPER THAMES STRATEGIC STORAGE RESERVOIR**

- 5.1 Core Policy 14a proposes an expansion of the Upper Thames Strategic Storage Reservoir Safeguarding Area. The proposed area includes land on the north eastern edge of East Hanney being promoted for development including Land East of the A338.
- 5.2 Edgars object to the expanded safeguarding area for the Upper Thames Reservoir as it is not justified.
- 5.3 The supporting text to the policy 14a implies that the safeguarding area has been updated to reflect updated plans prepared by Thames Water and submitted to the Council at the Publication Stage of the Local Plan 2031: Part 1 (LPP1).
- 5.4 It is noted that the Council sought to extend the safeguarding area through LPP1. This was however rejected by the Inspector who commented in his report at paragraph 109 as follows:
- "there is not currently the evidence to determine whether or not the extended safeguarded area for the reservoir between East Hanney, Marcham and Steventon is soundly-based. I have therefore concluded that it is not appropriate to extend the safeguarded area at this stage although, for the plan's effectiveness..."*
- 5.5 The Council has not referred to any new evidence since the adoption of LPP1 which justifies the extended area for the reservoir. Edgars accordingly object to the extended safeguarded area as being unjustified.
- 5.6 Edgars understands that Thames Water will be submitting further details of its Water Resource Management Plan to the Government in January 2018 which will be subject to consultation and potentially a public inquiry. This information may also inform the LPP2 with regard this matter and Edgars reserves the right to comment on any new information in relating to the Upper Thames Safeguarding Area.

## **APPENDIX 1**



# SITE LOCATION PLAN - LAND EAST OF A338, EAST HANNEY



## Comment

<b>Agent</b>	Mr Paul Slater (872479)
<b>Email Address</b>	paul@edgarslimited.co.uk
<b>Company / Organisation</b>	Edgars Limited
<b>Address</b>	The Old Bank 39 Market Square Witney OX28 6AD
<b>Consultee</b>	(1143289)
<b>Company / Organisation</b>	Lagan Homes Limited
<b>Address</b>	c/o Agent c/o Agent c/o Agent
<b>Event Name</b>	LPP2 Publicity Period Oct - Nov 2017
<b>Comment by</b>	Lagan Homes Limited ( )
<b>Comment ID</b>	407
<b>Response Date</b>	22/11/17 14:40
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.** CORE POLICY 8A

**Q2 Do you consider the Local Plan is Legally Compliant?** No

**Q3 Do you consider the Local Plan is Sound?** No

**Q4 Do you consider the Local Plan complies with the Duty to Cooperate?** Yes

**Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Edgars representations submitted in respect of Core Policy 4a also apply Core Policy 8a

**Q6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

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**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** Yes - I wish to participate at the oral examination

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

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Edgars Limited represents Lagan Homes Limited who have a land interest at East Hanney

**Would you like to hear from us in the future?**

- . I would like to be kept informed about the progress of the Local Plan
- . I would like to be added to the database to receive general planning updates

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<b>Address</b>	c/o Agent c/o Agent c/o Agent
<b>Event Name</b>	LPP2 Publicity Period Oct - Nov 2017
<b>Comment by</b>	Lagan Homes Limited ( )
<b>Comment ID</b>	410
<b>Response Date</b>	22/11/17 14:49
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.** CORE POLICY 14A

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1.2 Edgars object to the expanded safeguarding area for the Upper Thames Reservoir as it is not justified.

1.3 The supporting text to the policy 14a implies that the safeguarding area has been updated to reflect updated plans prepared by Thames Water and submitted to the Council at the Publication Stage of the Local Plan 2031: Part 1 (LPP1).

1.4 It is noted that the Council sought to extend the safeguarding area through LPP1. This was however rejected by the Inspector who commented in his report at paragraph 109 as follows:

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<b>Address</b>	c/o Agent c/o Agent c/o Agent
<b>Event Name</b>	LPP2 Publicity Period Oct - Nov 2017
<b>Comment by</b>	Lagan Homes Limited ( )
<b>Comment ID</b>	405
<b>Response Date</b>	22/11/17 14:38
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Lagan Vale LPP2 Representations - East of the A338 East Hanney
<b>Q1 To which part of the Local Plan does this representation relate? Please state the paragraph or policy or policies map.</b>	CORE POLICY 4A
<b>Q2 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q3 Do you consider the Local Plan is Sound?</b>	No
<b>Q4 Do you consider the Local Plan complies with the Duty to Cooperate?</b>	Yes

**Q5 Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Please see attached representations

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**Please upload any supporting information**

Lagan Vale LPP2 Representations - East of the A338 East Hanney  
Lagan Vale LPP2 Representations - East of the A338 East Hanney