

**EXAMINATION HEARING STATEMENT
ON BEHALF OF
BARWOOD DEVELOPMENT SECURITIES LTD**

MATTER EIGHT:

**Strategy for Abingdon-on-Thames and Oxford Fringe Sub-
Area (CP8 – CP11 and CP14)**

January 2016

Hearing Statement on Matter Eight

Matter 8 – Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area (CP8 – CP11 and CP14)

- 8.1 *Other than in connection with Green Belt issues (considered in Matter 5) are the Strategic Housing Allocations listed in policy CP8 soundly based and deliverable?*
- (a) *North of Abingdon-on-Thames (site 2)*
 - (b) *North-West of Abingdon-on-Thames (site 1)*
 - (c) *North-West of Radley (site 4)*
 - (d) *South of Kennington (site 3)*
 - (e) *South of East Hanney (site 6)***
 - (f) *East of Kingston Bagpuize with Southmoor (site 7)*
- 8.2 *Are there other sites which would more appropriately meet the identified need for new housing?*
1. The inclusion of housing delivery in larger villages within the proposed strategy is sound, and deliverable in principle. The polycentric nature of the District makes this a sound and sustainable approach, and as intended by the Council it would build on the strengths and opportunities offered by existing settlements and communities. This approach will help to meet housing needs in a way which sustains and supports services and facilities, as well as the housing market, in existing communities (as discussed in Stage 1 of the Examination Hearings).
 2. The Council has set out its rationale for development across the settlement hierarchy, including the 'larger villages' like East Hanney. The Housing Delivery Update 2014 (document PLP01.1) – para 4.44 states:

“East Hanney [and Harwell are]..... considered to be sustainable locations for development being well located in the heart of the Science Vale Oxford area and close to a large range of employment opportunities. Further development at these villages will help to support enhanced services and facilities. We have ensured the scale of growth allocated within these villages is modest to maintain their village character.”
 3. In the context of East Hanney, the Council's position on which site is the most suitable and sustainable site to accommodate the 200 dwellings allocated to the village changed relatively late in the plan preparation process. In the 'Consultation Draft Part 1 Local Plan' of February 2014 the Council proposed the (Barwood promoted) site to the east of the village located adjacent to the A338 road and south of Steventon Road. However, by the time of the Council's revised Sustainability Report (SA) of October 2014 the proposal was to allocate the site to the south of the village (Site 6) instead. Notwithstanding the change to remove the site to the east of the village, the Council's Topic Paper 3 'Strategic Sites Selection', November 2014, suggest that as a minimum the western part of the site next to the A338 "is considered

suitable for development", and "could be considered through the Local Plan 2031: Part 2 process" (TP03, Appendix B, page 48).

4. The reasons given for the change of site were never fully elaborated upon but are indicated in the SA report of October 2014 as being:
 - A judgement that the site to the south would be better integrated with the existing village;
 - A response to the public reaction to the February 2014 consultation document, with a perception that the site to the south was preferred locally.
5. The change to the southern site, and the reasons given in brief to explain it are unclear, and remain unjustified, for a number of reasons explored below. As set out below, it is clear that the site to the east of East Hanney remains the most appropriate site for allocation:

Technical Evidence – comparison of the two sites

6. Development on the site to the east of the village was recently comprehensively assessed by Officers following the submission of an outline planning application for up to 200 homes. The application focused on the western part of a larger site initially promoted, and was consistent with the Council's earlier proposed allocation site.
7. The Officer's clear conclusion having assessed the technical evidence submitted, and in light of the consultation responses provided by consultees, was that the proposals represent 'sustainable development' as defined by the NPPF and should be approved. This recommendation was made in the context of the Council's lack of a 5 year supply of deliverable housing land against the emerging Core Strategy requirement of 20,560 dwellings to 2031 (1028 homes per year).
8. An application for development on the Council's preferred, proposed allocation site to the south of the village was also recently considered by the Council – also recommended for approval. While both considered sustainable and suitable by the Council's planning officers, there are differences between the two sites, and it seems clear that on balance the least constrained and most beneficial of the two sites is that to the east of East Hanney, and Barwood remain keen to bring the site to the east forward to meet housing needs. As assessed in the recent Planning Committee report, the site would deliver a range of social, economic and environmental benefits which would outweigh any harm caused, including loss of countryside. The officer's report was clear that the site would deliver a scale and density of development appropriate to the edge of village location. The benefits of the application included:
 - local highways and accessibility improvements, including a realignment of the A338 which would enhance pedestrian and cycle access to the existing village, not only integrating the site with the village but also enabling more community cohesion and improved movement between other existing and approved residential development east of the A338 and the shops and services in the north west of the village;

- Enhanced public transport accessibility, including links to Oxford and Wantage in the Science Vale area;
- Provision of a range of new high-quality community open spaces on-site;
- The potential to deliver improvements to local education capacity and other local facilities.

The site east of East Hanney therefore provides unique opportunities for important public benefits which cannot be delivered on the site to the south of the village, and which should be afforded significant weight in favour of the strategic allocation of this site.

9. The Council's Landscape Capacity Study (document ref. NAT04.5 of Feb 2014, and NAT04 of October 2014) concluded that the site to the east of the village had the potential to accommodate development in a more sympathetic way than the site to the south. The site to the south was assessed as having "*very limited potential for development*" and would "*result in harm to the wider landscape, the settlement pattern and its landscape setting*" (NAT04, Table 2). The recommendation was that the north-edge of the site only might be suitable for development adjacent to existing houses. Conversely, the assessment of a larger site of 50ha on the east of East Hanney was, while still considered to have some adverse landscape impacts, considered appropriate for development closest to the village. The Council's previous allocation proposal, and the recent application by Barwood, was for a much smaller site than was considered in the Capacity Study (15.6ha) along the A338, and south of existing development to the immediate north on Steventon Rd.
10. A further key difference between the two sites is with regard to their relationships with areas prone to flooding. Development proposed at Site 6 to the south adjoins areas within flood zones 2 and 3 associated with groundwater and fluvial flooding from the Letcombe Brook. This sets it apart from the alternative site to the east, where there is a small area prone to surface water flooding associated with the existing highway, but the proposed development does not contain any land outside of zone 1. Therefore, the proposed allocation site (Site 6) can be considered less suitable on the grounds of climate change and flood-risk than the site to the East, and indeed was scored as such in the Council's SA work.
11. The deliverability of the Council's emerging strategy to deliver new homes in East Hanney was recently undermined by the refusal of planning permission by the Council on the proposed allocation site at East Hanney (site 6). The reasons given for refusal include concerns about harm related to landscape and conservation assets, as well as concerns over the quality of the design of the proposals including in terms of the density proposed. This latter reason suggests that given the constraints on the site, including flooding and existing landscape features, and the relationship with the Conservation Area, the Council is now of the view that the site is not capable of accommodating the full 200 units allocated to the village. Therefore the District Council's current position with regards to the suitability and deliverability of the proposed allocation site to the south of East Hanney is now somewhat unclear.
12. The Council has identified the site to the east of the village as a candidate site to be brought forward through the Part 2 Local Plan process, clearly indicating its potential to make a sound and sustainable contribution to meeting housing needs. Therefore, the Council is clearly of the view that both strategic sites in East Hanney are suitable for development, and indeed are both likely to be required in the plan period in order to deliver the objectively assessed housing need. In considering the recent planning applications, the cumulative impacts of both

sites being brought forward were considered by key consultees, and by the District Council. There were no technical or infrastructure related barriers or challenges to the delivery of both sites, and having considered the cumulative effects, both sites were recommended for approval.

13. The Council's updated housing land supply and trajectory information is awaited with interest, but an approach where both sites are allocated is of direct potential relevance given the increase in the rate and quantum of housing required by the emerging Local Plan and given the historic under-delivery and comparatively low rate of development in the District. There are clearly problems with the rate of delivery on key strategic sites in the District, most notably the Grove Airfield site which represents a major source of housing supply but which is considerably behind the Council's published housing trajectory of November 2014. The site at Grove, expected to deliver 2500 dwellings in total, including 350 units by March 2016, still does not have the benefit of planning permission. The site will clearly not make the expected contribution to delivery early in the plan period, and given the apparent lack of progress is unlikely to see very much if any delivery for some considerable time, suggesting this under-delivery will continue well into 2016/17 and could easily be 500 units short by the end of that year.
14. Even without any consideration of the likely increase to the housing requirements as a result of Oxford's unmet need, many of the Council's assumptions regarding housing delivery on a number of large committed sites have proved to be unrealistic. The Council has been unable to demonstrate a five year supply of land throughout 2015 against the objectively assessed need, and in that context delaying the allocation of the site east of East Hanney to later in the plan-preparation process (Part 2 or Neighbourhood Plans) is inappropriate: it should be allocated now to help deliver the '*significant boost*' to housing required by the NPPF, and to help address the historic shortfall in supply. These issues are also referred to under Matter 11.

Public opinion/local preferences

15. With regard to local opinion and preferences, it is clear that the Parish Council and local community has concerns about the principle of an allocation of 200 units in the village. There has never been a formal expression of any preference for Site 6 to the south over the initially proposed eastern site from the local community. The Parish Council is due to participate in the Hearings, and will no doubt be able to articulate local views on this issue.
16. Moreover, in direct contradiction to the District Council's summary of local public opinion, there is evidence that the weight of local objection is more pronounced for Site 6 than for the originally proposed allocation site on the east:
 - A resolution approved by the Parish Council in December 2014 includes a clear statement that should an allocation be made of 200 units "***the majority would prefer it to be on the East of East Hanney site, rather than the South of East Hanney site***".
 - The Parish Council's response to the Consultation of December 2014 includes a comparative analysis of the two sites, and the grounds for objection to the site to the east are far fewer and less significant than those given for the site to the south.

Indeed, a 'view from local residents' prepared in response to the District Councils proposals in December 2014 is clearer in recommending that the Council revert to the original preferred site.

- The overall response to the pre-application public consultation held by Barwood in the village in the summer of 2015 provided clear and explicit, albeit informal expressions of clear local preference for the site to the east over that proposed by the Council to the south. This is therefore consistent with the Parish Council's resolution of December 2014.
- The planning application on the site to the south of the village generated more neighbour objections than the site to the east of the village.

17. Appended to this Statement is the full resolution approved by the Parish Council in December 2014 following the change in proposed allocation site.
18. The stated preference of the Parish Council for there to be no further development in East Hanney is unsurprising and the norm in many communities. However, if faced with an unaltered strategy to allocate a site to deliver against the objectively assessed strategic housing need, local opinion is clear; the alternative site to the east – previously favoured by the Council – remains the most suitable and preferred site for allocation.
19. As a further observation, the east of East Hanney site is very similar in terms of its relationship with the village to that of the site proposed for allocation to the east of Kingston Bagpuize with Southmoor (site 7). That site is located to the east of the A415, where the majority of the village is located on the west of the road, and is proposed for allocation for 280 dwellings.

Conclusion

20. Barwood remain of the view that the site to the east of East Hanney would be a more appropriate allocation site than Site 6 – we believe the Council 'got it right first time', and should revert to their original proposed allocation. This is supported by the input provided by local people to Barwood's pre-application public consultation, and also by the input made by the local community to the Local Plan preparation process to date. The Parish Council has previously been clear in expressing its preference of this site over Site 6 to the south (see Appendix).
21. It is clear from the technical assessments undertaken by Barwood, and the responses provided by consultees, that there are no environmental or infrastructural constraints or barriers to delivery of the site to the east of East Hanney. The Council's officers consider the site a sustainable site, where any harm would be significantly outweighed by the benefits of development. Given local public opinion, if there is to be a single site allocation to East Hanney we believe the evidence suggests it should be the site to the east instead of Site 6.
22. The site is seen by the District Council as a candidate site for allocation through the Part 2 Local Plan, or through Neighbourhood Plans, as part of the unallocated residual housing requirement over the plan period. In the context of the challenging housing requirement facing the District, the site should be allocated now to help support housing delivery early in the plan period.

23. However, both the Barwood site and Site 6 were recently considered at the same Planning Committee, and were both recommended for approval. It seems clear that the District Council considers both sites to be suitable, deliverable, and sustainable, individually and in combination. Therefore, in the context of the overall housing numbers and delivery rate required, and the ongoing under-delivery on other key strategic sites - including the Grove Airfield site which features heavily in the new Local Plan - we believe the site east of East Hanney site should be allocated now, regardless of whether Site 6 is excluded or retained.

Appendix – East Hanney Parish Council resolution of December 2014 regarding proposed strategic site allocations

From: Guy Langton <gl-ehpc@outlook.com>
Sent: 12 December 2014 13:00
To: Rebecca Mitchell
Subject: RE: Land East of East Hanney #[prop]=02315

Dear Rebecca

we appreciate you coming to meet with us yesterday.

i can confirm that the words in bold below are accurate.

Best Wishes

Guy Langton
Clerk to East Hanney Parish Council
12 Brookside, East Hanney. OX12 0JL.
gl-ehpc@outlook.com
.....

From: Rebecca.Mitchell@barwood.co.uk
To: gl-ehpc@outlook.com
Subject: Land East of East Hanney #[prop]=02315
Date: Fri, 12 Dec 2014 08:08:53 +0000

Dear Guy

Thank you to you and your fellow parish councillors for meeting me at such short notice yesterday evening.

This was extremely helpful for informing our next steps and our detailed technical assessment and survey work (e.g. in respect of highways and sewerage infrastructure). We commit to looking at this in detail, including to look seriously at the technical feasibility and effectiveness of having a road running around the back of the development as an option. We will also commit to engage with the Parish Council regarding the design of any scheme and I would be happy if that was included in the wording of any policy if the site was allocated, which would provide certainty that the Parish Council would meaningfully influence that design code.

I am on leave today and am therefore cannot access the information I agreed to send over but will do so as soon as possible on Monday. Before then, I just wanted to confirm that I have written down the parish council's resolution made correctly with you:

- "1. The Parish Council, and the majority of residents, are firmly against a single 200 home development;**
- 2. If they had to have some development, they would prefer smaller sites that can be easily integrated into the village;**
- 3. If they are forced by the Planning Inspector to have a single allocation, the majority would prefer it to be on the East of East Hanney site, rather than the South of East Hanney site.**
- 4. The issues they have concerns about the E. of East Hanney site relate to:**

- **Sewerage infrastructure**
 - **Risk of flooding**
 - **How the site will integrate with the village given its location on the other side of the A338 (particularly given the planned developments in Grove and Wantage which would exacerbate congestion and traffic using the A338)**
- 5. Any development should reflect the character of the village, its density and design."**

I fully appreciate the Parish Council's position and please be assured that if we refer to our discussion with the Parish Council, we will do so by referring to this resolution in full, as agreed.

Kind regards

Rebecca

Rebecca Mitchell

Planning Executive

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