

Paul Butt Planning for Redcliffe Homes – Matter 3 Overall Housing Provision

(iFor the Inspector's consideration in considering Matter 3: 'Overall housing provision in the plan and its distribution between sub-areas' on Thursday July 5th, in addition to my Reg 19 response to consultation objecting to the soundness of the Local Plan Part 2 (LPP2) in relation to the omission of land adjoining and to the east of Uffington, a Larger Village in the Western Vale Sub-Area as a housing allocation, I would draw attention to the emerging Uffington and Baulking Neighbourhood Development Plan 2011-2031 Pre-consultation Draft (V32) 7 May 2018 (the emerging Neighbourhood Plan). The emerging Neighbourhood Plan identifies a clear local need for an additional at least 19 new dwellings in Uffington that has been identified in a Housing Needs Assessment (although a minimum of 19 is considered to be an underestimate), and the emerging Neighbourhood Plan accepts that some extension into adjacent areas would be necessary to accommodate even the minimum 19 dwellings. On behalf of Redcliffe Homes Ltd I would ask the Inspector to consider the emerging Neighbourhood Plan, and the attached response I have made to the pre-consultation draft, in examining the spatial strategy in LPP2 and the case for Uffington to include an allocated housing site, even if only exceptionally.

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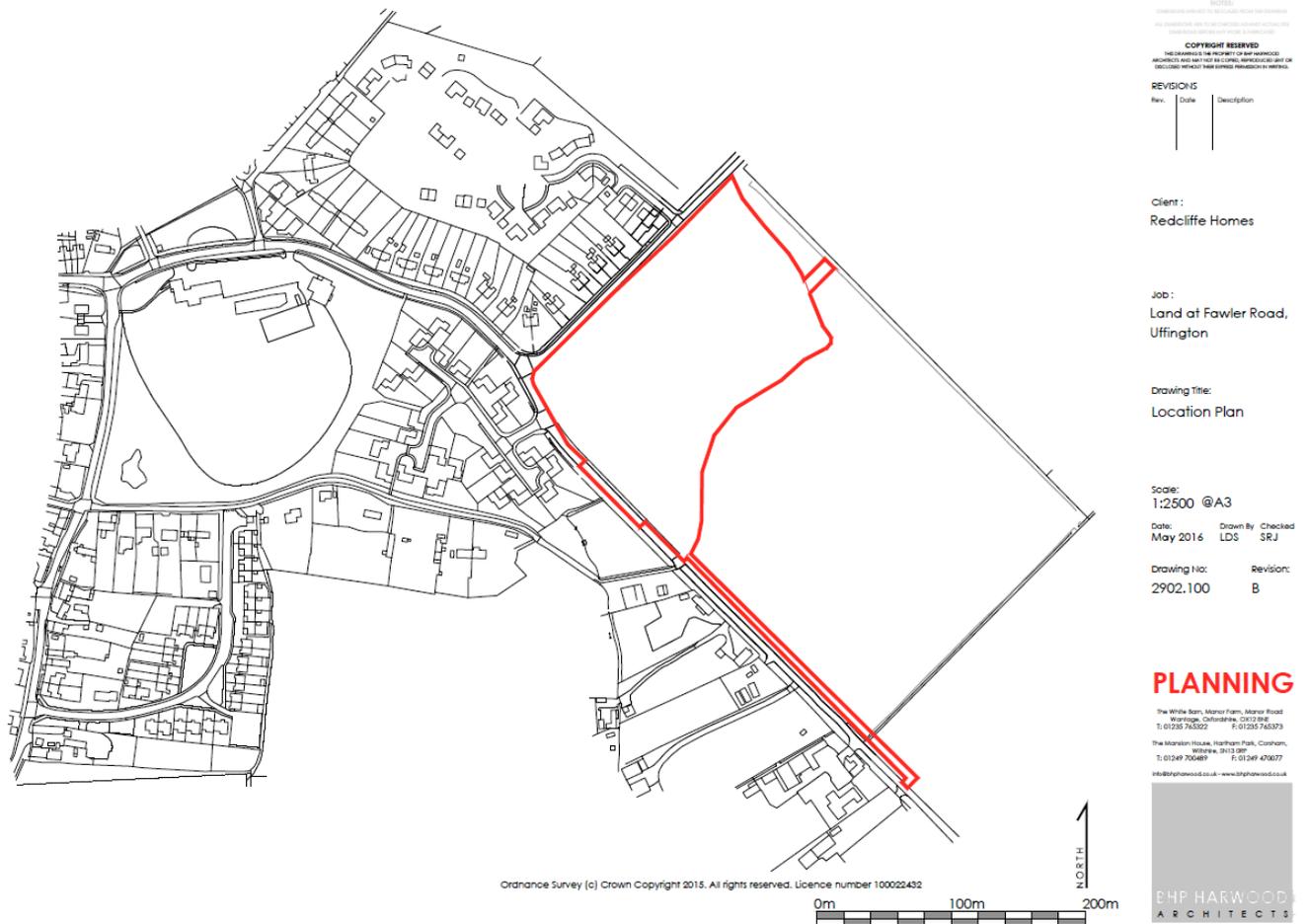
Uffington Parish Clerk (Mrs Julia Evans),
 Neighbourhood Plan,
 Uffington Parish Council NP,
 Moorcroft,
 West Hendred,
 The Greenway,
 Wantage,
 OX12 8RG.

6 June 2018

Dear Julia,

Comments on the Uffington and Baulking Neighbourhood Development Plan 2011-2031 Pre-consultation Draft (V32) 7 May 2018 (the Plan).

Further to Simon Jenkin's email of the 15 May 2018, on behalf of Redcliffe Homes Ltd I would make the following comments on the Plan. I hope these comments will enable you to include land to the north of Fowler Road and to the east of Station Road, Uffington, SN7 7SL (the Site) as a housing allocation to meet identified local housing needs for market and affordable housing. For information the Site is outlined in red on the plan below.



The Housing Needs Assessment Uffington & Baulking Final Report 22nd May 2017 (the HNA) and Policy H1 of the Plan identify a need for at least a further 19 new dwellings in the Neighbourhood Plan area over

the Plan period, and it is also proposed that these additional dwellings are built within the parish of Uffington.

I note that the pre-submission draft is a 'non-allocating' Plan, but I hope that these comments persuade you that **there is a clear need for Uffington village to identify an allocated housing site** so that the identified needs **for market, and for affordable housing** are achieved in the Plan period, and are **of the right dwelling mix** as is also identified in the HNA and in the Plan. To my mind there is a significant risk in progressing the Plan that it will not be found to comply with the Basic Conditions without an allocated housing site being identified, given the clear need.

I also hope to persuade you that **the Site is the right location to provide for the clearly identified local housing needs and in the identified mix**, and that without it there is a significant risk that the local needs for market and affordable housing, and of the mix sought as supported by the HNA, will not be achieved.

Background:

By way of background the Site was put forward as a suggested potential development site in the Parish Council's 'Call for Sites', and following a number of meetings with the Parish Council was subsequently the subject of a planning application to the Vale of White Horse District Council (the District Council) for **up to 44** new dwellings, including **up to 15 (35%)** affordable units, under planning application ref. P16/V3185/O. At the meetings with the Parish Council it was acknowledged by the Parish Council that should a site come forward in Uffington for housing, this location was considered the best. Indeed the Parish Council were very keen to promote the site as a larger housing site at one time, with a potential new primary school. Whilst the application was refused by the District Council because they considered that it would extend *"into the open countryside in a manner which does not accord with the District's strategy for growth as set out in the Development Plan"* this matter, amongst others, is disputed and is being progressed through representations that have been made to the District Council for consideration in the forthcoming examination of the Local Plan 2031 Part 2 (LPP2). A Landscape and Visual Impact Assessment accompanying the application summarised that for the **up to 44** new dwellings: *"There would be no important adverse effects on the wider landscape character, including that of the North Wessex Downs AONB."* To my mind, and with the benefit of the meetings with the Parish Council, the Site is a good site for an allocating Plan, and has a number of additional beneficial merits for the village over and above providing for the clear local need. For example, providing connectivity to complete a circular walk around the village and to the sports ground, and in terms of local traffic calming along Fawler Road and Station Road.

The representations that have been made to the District Council for consideration in the forthcoming examination of the LPP2 demonstrate that the LPP2 is unsound having regard to the four tests set out in para. 182 of the National Planning Policy Framework (the Framework). This is due to the LPP2 not being justified (not being *"the most appropriate strategy, when considered against reasonable alternatives"*) nor consistent with national policy (not enabling *"the delivery of sustainable development in accordance with the policies in the Framework"*). The main reasons the LPP2 is considered to be unsound are:

(i) The proposed housing strategy in the LPP2 Policy 4a is not the most appropriate housing strategy when considered against reasonable alternatives. The housing strategy in LPP2 derives from the Sustainability Assessment (SA) and which is not robust. For example, in justifying the most appropriate strategy LPP2 Policy 4a allocates housing sites in the Green Belt and AONB when considered against reasonable alternatives that are not in the Green Belt or AONB such as the Site. In this case specific policies in the Framework (footnote 9 on page 4) do not indicate development should be restricted on the Site.

Furthermore the Site of itself has not been considered as a reasonable alternative in the SA. Rather the Site has been considered in the Topic Paper 2 Site Selection Appendix A October 2017 without properly considering the representation made in relation to the Site itself in the Local Plan 2031 Part 2 Preferred Options consultation, and in relation to the SA that accompanies the Preferred Options. In particular the SA at para. 10.2.4 on page 38 the third bullet point states:

"No LPP2 allocations are proposed within the Western Vale; however, this is not necessarily an issue, recognising that most settlements here have high, or at least sufficient, committed development (N.B. Uffington is something of an exception to the rule, in that it is a 'larger village' in the Western Vale with just one committed site for 36 homes). The sub area as a whole has completions/commitments in place to

provide for 23% above the target.”

The ‘committed site’ for 36 homes (including 14 affordable homes) has now been completed by Redcliffe Homes Ltd, opposite the Site to the northwest, and is known as Jacks Lea. The HNA establishes that in addition to the Jacks Lea development a further 19 dwellings are needed. In para. 1.5 of the HNA *“It is recommended that these 19 additional dwellings should comprise of 1-2 bed and 3-4 bed semi-detached and bungalow homes for young couples, families and elderly”*.

Redcliffe Homes’ intention is to provide for the 19 additional dwellings in the mix recommended by the HNA, thereby providing certainty that the Plan’s housing objectives will be achieved. The HNA identifies a need for affordable housing and again the intention is to provide the required 35% affordable homes under Core Policy 24 of LPP1, split 75:25 as sought district wide by Core Policy 24 for rented (either social or affordable) and intermediate housing respectively, or an alternative mix to reflect identified affordable housing needs locally (in the case of 19 dwellings this would amount to at least a policy-compliant 6 affordable homes, comprising 4 rented and 2 intermediate affordable homes). Despite Uffington being acknowledged in the SA as an exception to the rule, no LPP2 allocations are proposed in the Western Vale Sub-Area, including at Uffington; and

(ii) The housing allocations in Policy 4a are **not in accordance with either the spatial strategy or the settlement hierarchy set out in the LPP1**. No sufficient justification has been given in LPP2 for departing from the LPP1 spatial strategy and settlement hierarchy by omitting Uffington because it lies in the Western Vale Sub-Area, thereby adopting a strategy that denies the identified market and affordable housing local needs of this Larger Village from being provided for in LPP2, even as an exception to the rule. There are reasonably alternative, much more sustainable, sites such as the Site adjacent to the Larger Village of Uffington, that are not in the Green Belt nor the AONB, unlike a number of the allocations in Policy 4a, and which are able to accommodate new homes in a way that does not depart from the LPP1 spatial strategy or settlement hierarchy, and in so doing accommodates identified local needs, even if needs be as an exception to the rule, in what appears from the SA to be a unique case at Uffington. Development of the Site adjoining the Larger Village of Uffington for housing, where specific policies in the Framework (footnote 9 on page 4) do not indicate development should be restricted, and where there would be no important adverse effects on the wider landscape character, including that of the North Wessex Downs AONB, is a reasonable alternative and the most appropriate strategy, allowing for exceptions in unique cases such as at Uffington, that will enable the delivery of sustainable development in Uffington in accordance with the policies in the Framework.

In effect the Vale of White Horse District Council consider anything to the west of Wantage is on the ‘wrong’ side of the line (in the Western Vale Sub-Area) for the SA to consider as a ‘reasonable alternative’ to the housing allocations in Policy 4a which comprise sites in the Green Belt and AONB, and regardless of any exception to this rule. The Landscape Capacity Study March 2017 accompanying LPP2 does not consider the Site, nor does the October 2017 Addendum, and it is not referred to in the SA. The Topic Paper 2 Site Selection Appendix A October 2017 rules out HELAA site ref. UFFI02 at Stage 2 (initial site filters) because it is in the Western Vale Sub-Area and so no detailed assessment of constraints and opportunities was carried out under stage 3, nor any detailed evidence testing, informal consultation or sustainability appraisal under stage 4.

The District Council’s Local Development Scheme 2018 -2020, February 2018 gives an estimated date for adoption and final publication of LPP2 in December 2018. The Neighbourhood Plan Schedule as at 2 January 2018 does not anticipate that the Examiners Report on the Plan will be complete until the 20 December 2018. It is therefore likely that the Examiner’s Report into the LPP2 will be available before the Examiner’s Report into the Plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. The Site may well be allocated for general housing needs in the Western Vale Sub-Area of LPP2, although even if it is not then in the exceptional case of Uffington there is a clear need to identify a housing site so that the identified local needs for market, and for affordable, housing are realised in the Plan period, and are of the right dwelling mix.

Examination of the Housing Needs Assessment Uffington & Baulking Final Report 22nd May 2017 (the HNA) and the Plan:

The Plan relies on the HNA in proposing, in Policy H1, a further “*at least 19 new dwellings*” to 2031, although no specific sites are identified in the HNA, whether on infill or brownfield sites. Rather, the Plan relies on a past increase of 9% (30 dwellings) over the decade 2001 – 2011 (from 326 dwellings in the Plan area to 356 dwellings) to predict a similar rate of growth of 9.5% (or 34 dwellings rounding up) per decade over the Plan period itself, 2011 – 2031 (68 dwellings in all over the Plan period rather than the 67 referred to in the Plan). There are a number of reasons why a predicted rate of growth of 9.5% per decade is likely to be an over-prediction, and the proposal for 19 dwellings to 2031 is likely to be an underestimate.

Firstly, since December 2016 Baulking has been considered by the Vale of White Horse District Council in LPP1 to be ‘Open Countryside’ and therefore it is unlikely that any new dwellings will be permitted in Baulking under the strategic policies in the LPP1. In any event just one dwelling was permitted in Baulking in the decade between 2001 – 2011, involving the change of use of an existing building. This is perhaps why the HNA proposed that the additional dwellings should be built mainly within the parish of Uffington, and which to my mind does appear sensible given the concentration of services and facilities in the ‘Larger Village’ of Uffington.

Secondly, the Plan assumes a higher rate of growth (9.5% per decade) over the Plan period, slightly more than has been achieved in that relied upon in the Plan of 9% between 2001 – 2011, and without any apparent justification for a continuing rate of growth being able to be achieved. In para. 5.8.4 the Plan refers to ‘Infill’ development and states:

“Based on map assessments and discussions with residents it appears unlikely that all 19 dwellings proposed in the HNA could be accommodated within the existing built area and that some extension into adjacent areas would be necessary for this quantum.”

No ‘infill’ sites are identified in the Plan, and ‘infill’ building plots do tend to ‘dry-up’ over time. In any event the Plan accepts that in any event some extension into adjacent areas will be necessary to accommodate even 19 dwellings.

Para. 5.8.4 goes on:

“It is estimated that there are likely to continue to be at least one or two infill dwellings built per year in the remainder of the Plan period, thereby meeting the proposed minimum number in Policy H1.”

This contradicts the previous statement that an extension outside the existing built area into adjacent areas will be necessary to accommodate even 19 dwellings. The Plan appears to be based on the ‘hope’ that infill plots will come forward for the quantum of at least 19, accepting that this is unlikely, rather than ‘planning’ for it by identifying an extension of the built area.

Of the total requirement identified in the Plan of 67 additional dwellings over the Plan period, para. 5.7.1 of the Plan states “*48 dwellings have already been completed by March 2018, through a development of 36 homes at Jacks Meadow and 8 other dwellings in Uffington plus 4 single dwellings in Baulking, leaving a balance of 19.*” It should be remembered that the Jacks Meadow [Lea] development was only allowed by the Vale of White Horse District Council as a “*suitable extension to the village*” (para. 7.1 of the Planning Committee report) because of an absence of a five-year housing land supply in the District at the time, an application on which Uffington Parish Council had many concerns. The Planning Committee report also noted of the 44 local resident objections that this was an “*unusually large response of objections*” (para. 6.12). I am struggling to identify the 4 single dwellings completed by March 2018 in Baulking, and in any event the Plan proposes the at least 19 new dwellings be built in Uffington, rather than Baulking, where the services and facilities of this ‘Larger Village’ are concentrated.

Thirdly, para. 5.7.4 of the Plan advises “*the HNA surveys indicated that there is a demand for affordable housing*”. However, it is unlikely that any affordable housing will be secured from a ‘non-allocating’ plan. Para. 5.7.4 goes on to advise “*There are limited sites in the Plan area capable of triggering this affordable housing threshold*” but does not identify any sites capable of triggering the threshold of 11 or more dwellings. The Written Ministerial Statement also means that developments of 10 or fewer dwellings would likely not require affordable housing to be provided.

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Assessment of the need for affordable housing in Uffington and Baulking:

It is not clear from the Plan how many of the “at least 19 new dwellings” proposed in Policy H1 are required as affordable housing.

In the Executive Summary on page 6 the “Lack of affordable housing – in terms of numbers and affordability” is a main issue for the Plan, and which Policy H1 seeks to address, although no sites are identified that are capable of triggering an affordable housing requirement.

The HNA advises that affordable housing is favoured in Uffington, but to a lesser extent in Baulking (para. 2.33). The HNA cites comments received such as “Most children have to leave the village in past as houses not available and too expensive in general” (suggesting 1 and 2-bed starter homes as the main type of housing required and at quantity of 5 – 10 affordable homes) and advises that affordable housing should include some bungalows for older people in Uffington (suggested in the HNA as around 5 in number). On their own these make a **requirement of between 10 and 15 affordable houses over the remainder of the Plan period.**

Examination of the contribution of historic infill sites to market and affordable housing:

The Plan advises in para. 5.8.4 ‘Infill’ that “Typically, there have been 2-3 buildings in this category built each year.” I presume that this means 2-3 dwellings have been built each year. However, this is not wholly clear.

In the last calendar year to the 7 May 2018 consultation on the Plan, there has been just one application permitted (as distinguished from ‘built’) for residential development in Uffington:

- a Certificate of Lawfulness for The Barn at The Laurels that had been used in excess of 10 years as a separate dwelling despite an ancillary use condition (P17/V3022/LDE).

Only one dwelling, and that via a Certificate of Lawfulness for a building that had already been used for 10 years, was permitted in the last year to the 7 May 2018, and this did not contribute towards the identified need for affordable housing.

In the previous 7 years or so, from 1 January 2011 – 6 May 2017 there have been a total of 52 permitted dwellings in Uffington and Baulking:

	Uffington	Baulking
• in 2011;	5 (3 by CoL)	1 (Change of use of the former Engine House)
• in 2012;	0	0
• in 2013;	36 (Jacks Lea)	2 (Hyde Farm)
• in 2014;	1	0
• in 2015;	4	0
• in 2016; and	1	1 (Collier’s Farm agri. building Prior Notification)
• to the 6 May 2017;	0	1 (Oldfield Farm agri. building Prior Notification)

Therefore from the beginning of the Plan period to the 7 May 2018 consultation there have been 53 dwellings permitted, and taking out Jacks Lea 17 over the 7 or so years. A number of these 17 have been as a result of Certificates of Lawfulness, agricultural prior notifications, and changes of use rather than infilling for new dwellings. As a result there has been much less than the 2-3 buildings (dwellings) from ‘infill’ sites than the Plan suggests there has been. It is also noted that Uffington Parish Council and Baulking Parish Meeting objected to a number of the dwellings that were permitted by the District Council.

The only development contributing towards the identified affordable housing need is Jacks Lea, and which was permitted as an extension to the village in the absence of a sufficient supply of housing land in the District as a whole at the time. Of course achieving a five year housing land supply in the District as a whole is not fixed, it changes annually, and upon scrutiny a number of appeal Inspectors have considered that the District Council has not been able to achieve a five year supply post the adoption of LPP1 in

December 2016 (for example appeal ref APP/V3120/W/16/3145234 at Greensands in East hundred where that site was found to be outside the built area of the 'Larger Village'). Settlement boundaries for the 'Larger Villages' such as Uffington are not defined by the LPP1 policies map, nor are they in the LPP2 policies map.

I think it likely that the contribution from 'infill' sites towards market and affordable housing, which the Plan bases "on map assessments and discussions with residents" (evidence which has not apparently been published and so cannot be interrogated) has been overestimated at 2-3 dwellings built each year. Only one has been permitted in the last year and that was for a Certificate of Lawfulness that apparently had to wait 10 years to achieve the Certificate.

It is I think also reasonable to expect 'infill' sites to 'dry up' over time, although I do appreciate that there may be unexpected individual sites that come along from time to time and achieve a planning permission

for a new dwelling(s), although as I say the Parish Council and Meeting have historically objected to quite a number of them. Nevertheless, the indicators for 'infill' dwellings coming forward in the amount required to meet local needs over the remainder of the Plan period are not good, the outcome in terms of the mix is not controllable, and the likely provision of any affordable housing non-existent.

Assessment of Section 5 Housing against the Basic Conditions that the Plan must meet:

In summary the "basic conditions" the Plan must:

- having regard to **national policies and advice** contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the neighbourhood plan **contributes to the achievement of sustainable development**;
- the making of the neighbourhood plan is **in general conformity with the strategic policies contained in the development plan for the area** of the authority (or any part of that area);
- the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
- the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.
- An independent examiner must also consider whether a neighbourhood plan is compatible with the Convention rights.

The Plan does not have regard to national policies and advice because:

Paragraph 16 of the Framework is concerned with neighbourhood planning and states: "*The application of the presumption [in favour of sustainable development] will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:*

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; [and]*
- ***plan positively to support local development**, shaping and directing development in their area that is outside the strategic elements of the Local Plan;*"

It is not considered that the Plan positively supports the achievement of the identified local needs for market and affordable housing through Policy H1. The number of houses required is not a small number over the Plan period and the likelihood of any affordable housing being provided from infill development is non-existent (para. 5.8.4 of the Plan: "*Based on map assessments and discussions with residents it appears unlikely that all 19 dwellings proposed in the HNA could be accommodated within the existing built area and that some extension into adjacent areas would be necessary for this quantum*").

In addition the Plan must give sufficient clarity to enable a policy to do the development management job it is intended to do; or to have due regard to Guidance. For example, para 042 of the Guidance explains that:

*"A policy in a neighbourhood plan should be **clear and unambiguous**. It should be drafted with sufficient*

*clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be **distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.***"

Policy H1 is not clear and unambiguous in the dwelling mix it seeks to achieve. It does not relate specifically to the mix identified in the HNA and I am not clear how the identified local needs for affordable housing, young people/families, older people and smaller dwellings will have been achieved at the end of the Plan period from infilling, as opposed to a policy identifying an allocated site and reflecting the local housing needs unique to the neighbourhood area.

The Plan does not contribute to the achievement of sustainable development because it envisages very limited opportunities for housing against the clear identified need for at least 19 dwellings.

The Plan has been prepared with the LPP2 in mind and may not at the time of examination be in general conformity with the strategic policies of the development plan because in the SA supporting LPP2 the District Council accepts Uffington is an exception to the spatial strategy as a 'Larger Village' in the Western Vale Sub-Area but in which no housing allocation is proposed. The outcome of the examination into the LPP2 is unknown at this time.

In the Examiner's report into the unmade Wantage Neighbourhood Plan at para. 4.2 the examiner advised:

"The plan does not allocate any land for housing; indeed, it envisages very limited opportunities for housing. As such, coupled with its extensive protectionist policies and proposals, I have concluded that the plan fails to promote sustainable development, a Basic Condition."

The made Longworth Neighbourhood Plan is also a non-allocating plan, but Longworth is a 'smaller village' in LPP1 and there was "**no clear need for Longworth village to identify additional sites**" (para. 3.6). In addition "...it will be unlikely that any housing schemes in the parish will be required to deliver a proportion of affordable homes." (Para. 2.12).

The made Drayton Neighbourhood Plan was based on a Housing Needs Report May 2012 and included allocated housing sites. The report also revealed the local need for affordable housing and was specific about the type and tenure of such housing.

The following changes to the Plan are suggested:

1. As there is a clear need for housing that the 'non-allocating' Plan is reconsidered and the Site is allocated for housing under Section 5 to provide for the identified local needs for market and affordable housing and in the identified mix.

2. On page 58 of the Plan it states:

"This Plan does not propose any policies to address...concerns about public transport or traffic problems outside the villages as these are the responsibility of the County Council. In a recent application (2016) for 44 houses in Uffington, the County Council objected as it saw the location as highly unsustainable for housing development, largely because of the lack of public transport in the immediate vicinity.⁴⁷ It considered that the development was likely to be extremely car-orientated due to the limited options available to residents who need to commute elsewhere for their employment or education, contrary to Core Policy 35. The application was rejected.

47 Planning Application P16/V3185/O (2016)."

I think it is an **error** and misleading of the Plan to suggest the application was refused because of a lack of public transport, and that the development was likely to be extremely car-orientated. This is because the planning application was not refused on these grounds and indeed included a range of transport considerations from an analysis of the existing public transport that is available in the village, to the provision of electric car charging points for each of the new dwellings. How would the 19 dwellings

proposed in the 'non-allocating' Plan not equally lack public transport and be extremely car-orientated? If the County Council objected to a residential development in the Plan area would that mean the Parish Council accept that the identified local housing requirement were not provided for? I would suggest that this misleading, and potentially restricting, statement is omitted from "In a recent application..." onwards.

In conclusion I consider that:

- The Plan has been prepared with the LPP2 in mind but the LPP2 has **not yet been examined**, including in relation to the appropriateness of its spatial strategy of no housing allocations in the Western Vale Sub-Area, in which Uffington is considered by the District Council to be an exception to this rule, and in relation to housing supply in the District as a whole.
- In any event a non-allocating Plan is not the most appropriate strategy as there is a **clear local need** for at least an additional at least 19 new dwellings in the 'Larger Village' of Uffington that has been identified in the Housing Needs Assessment (although a minimum of 19 is considered to be an underestimate). Indeed the Plan accepts that some extension into adjacent areas would be necessary to accommodate even the minimum 19 dwellings.
- In the absence of an allocated housing site being identified it will be **unlikely that any housing schemes in the Plan area will be required to deliver a proportion of affordable homes** under Policy H1 of the Plan, and **even more unlikely that the mix sought in the Housing Needs Assessment (including 1 and 2-bed starter homes and bungalows for the elderly) would be achievable.**
- **Reliance on 'infill' sites coming forward** at a rate of 9.5% per decade as predicted in the Plan **are unlikely to be achieved over the Plan period**, and the Plan in any event accepts **that some extension into adjacent areas will be necessary to achieve the minimum of 19 dwellings needed.**
- The modification of the Plan is necessary to ensure that the Plan meets the Basic Conditions by including an allocated housing site for at least 19 new dwellings on the Site to the north of Fawler Road and to the east of Station Road, Uffington, and for at least 13 market and 6 affordable dwellings in the mix identified in the HNA, thereby **ensuring the local needs defined in the HNA are achieved over the Plan period.**
- The error on page 58 is corrected.

I hope these comments help. The Plan does appear to be based on the 'hope' that infilling will provide for the quantum of at least 19 dwellings, accepting that this is unlikely in any event and that an extension into adjacent area will be necessary, rather than 'planning' for it by identifying an extension of the built area for the right dwellings, including for affordable housing, and in the right mix that reflect the clearly identified local housing needs. I hope you will agree that allocating the Site for housing is the most appropriate reasonable alternative to a 'non-allocating' Plan, and that such an allocation is more likely to achieve the specific local housing needs that have been identified. As was originally envisaged, the allocation of the Site could provide other community facilities (as well as housing) and Redcliffe Homes Ltd would welcome further discussion to that end. I do appreciate that the Parish Council might anticipate an unusual number of local objections (as was the case at Jacks Lea) to an 'allocating' Plan, but after all at the end of the day we are talking about helping real people to occupy the right homes at the end of the Plan period...those homes that have been identified by the HNA and in the Plan.

Yours sincerely,

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RTPI

mediation of space · making of place

Chartered Town Planner

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