

1 April 2019

Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Abingdon
OX14 4SB

Dear Sir/Madam

**VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2: DETAILED POLICIES AND ADDITIONAL SITES
PROPOSED DRAFT MAIN MODIFICATIONS FEBRUARY 2019
REPRESENTATIONS FROM BLOOR HOMES RE: LAND EAST OF HARWELL ROAD, SUTTON COURTENAY**

I write on behalf of our client, Bloor Homes.

We are grateful for the opportunity to comment on the Council's Proposed Draft Main Modifications of the emerging Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites (the 'Local Plan').

We understand that our responses at this stage must focus on matters relating to the Main Modifications ('MM').

We can confirm that Bloor Homes' interest relates to a parcel of largely undeveloped land to the rear of dwellings on Harwell Road and Frilsham Street in Sutton Courtenay. The land extends to, and adjoins Harwell Road on its western boundary, adjoins Hobbyhorse Lane on its northern boundary, extends up to the public right of way (No. 373/7) on its eastern boundary and extends up to the public bridleway (No. 373/24) on its southern boundary. Bloor Homes' interest in the land relates to them having secured an option in the summer of 2018 to purchase the site.

Bloor Homes are one of the UK's largest family-run housebuilders and are a company in very secure private ownership.

Bloor Homes are committed to the site in Sutton Courtenay for the long term and as a housebuilder they are committed to delivery of new homes. For 50 years Bloor Homes have put the same amount of love and care into looking after their customers as they do crafting their beautiful homes. It's this dedication and commitment that has seen Bloor Homes receive the highest customer satisfaction rating than any other housebuilder in the UK, achieving a 5-Star status in the House Builders Federation Awards in 2019.



These representations relate specifically to MM2: Core Policy 4a: Meeting our Housing Needs.

Our representations are set out overleaf.

MM2 – Core Policy 4a: Meeting our Housing Needs

We note that the Vale of White Horse LPA area has experienced substantial housing delivery rates over the last three years, as evidenced by the Housing Delivery Test, which confirms that the number of homes delivered between 2015 and 2018 is 4,357. This rate of delivery is 3,052 over the OAN target of 1,305, and represents a 334% delivery rate.

Housing Delivery Test: 2018 Measurement

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test 2018 measurement	Housing Delivery Test 2018 consequence
	2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
Vale of White Horse	398	396	511	1,305	1,133	1,621	1,604	4,357	334%	None

Whilst this is of course welcome news to the area and wider country, it does show that some areas of the country have the right market conditions to deliver substantially more new homes than restrictive planning policies allow.

In addition, and perhaps of more concern, it demonstrates that land supply in the area may be ‘used up’ much quicker than anticipated by the Local Plan.

In essence, when the supply of land is fully utilised before the end of the Local Plan Period, as expected to be the case in the Vale of White Horse; the housing need will begin to outstrip supply once more.

We consider that there is a genuine opportunity for the allocation of additional sites in Sutton Courtenay to assist both the wider housing market area and to assist the specific problems of housing delivery in Sutton Courtenay.

We note that Paragraph 68 of the NPPF (in both the July 2018 and February 2019 versions) states:

“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”* (underlining is our emphasis)

We note that Paragraph 70 of the NPPF (in both the July 2018 and February 2019 versions) states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

The allowance for housing supply from windfall sites included in Core Policy 4a as proposed to be amended by MM2 is shown reduced by 100 dwellings, down from 1,100 to 1,000 dwellings. Whilst this responds to the rate of 100 per annum, and is amended to reflect the likely adoption date of the Local Plan, we consider this is an unfortunate reduction. In our experience, a higher allowance for windfall sites is helpful in ensuring the supply of new homes throughout a plan period.

Particularly in the context of a Strategic Housing Market Area which is currently experiencing very high delivery rates, and could overheat in due course, or run out of housing land supply.

Redrow's Planning Application

Whilst we note that some areas of the Vale are experiencing rapid delivery of new homes, we note that in the case of Sutton Courtenay that planning application determination is not an easy or quick process.

We have monitored Redrow's planning application relating to land off Hobbyhorse Lane, Sutton Courtenay Abingdon, OX14 4BB, which seeks outline planning permission for up to 200 dwellings, including vehicular access, pedestrian and cycle links, public open space, car parking, landscaping, drainage and associated works.

The planning application was submitted to the LPA on 11th July 2017, and was duly registered on 18th July 2017 under reference P17/V1963/O-3. We note that the application has been amended as follows:

- amended Planning Statement (August 2018)
- amended Framework Plan (August 2018)
- amended FRA (August 2018)
- amended Drainage Strategy (August 2018)
- amended Design and Access Statement Addendum (August 2018)
- amended Framework Plan and supporting documentation received 31 January 2019.

We note the latest consultation period for the application expired on 25th February 2019, but to date, not all consultee responses have been returned to the LPA.

The target date for the determination of the application is 29th March 2019 (today), but we note the objections from consultees and as a result we do not expect the decision to be issued soon.

Land to the East of Harwell Road

Sutton Courtenay is defined as a large village in the Vale of White Horse Local Plan 2031 Part One. The village provides a range of services including shops, community facilities, a primary school, some employment opportunities and access to public transport serving larger towns and other employment areas such as Milton Park.

- the site measures approximately 15.8 hectares and is located to the southern edge of Sutton Courtenay
- the site primarily consists of agricultural fields but also includes 2 dwellings, a market garden together with its shop and the site of a demolished church
- houses fronting Harwell road adjoin the site's western boundary while to the north are houses fronting Frilsham Street and Hobbyhorse Lane
- land to the north of Hobbyhorse Lane is allocated for housing in the emerging Local Plan and is the subject of the current application for up to 200 dwellings outlined above as 'Redrow Application' and the failed application (P15/V2353/O)
- to the south is an employment area that has planning permission for a substantial B8 warehouse (P14/V1906/O and P16/V1766/RM)

- public rights of way define the site's eastern and southern boundaries while Hobbyhorse Lane to the north of the site is a byway open to all traffic (BOAT)
- a public footpath runs through the centre of the site, connecting hobbyhorse Lane to the public footpath along the southern boundary
- the national cycle network 5 is located close to the site's eastern boundary and provides cycle access to Didcot and Abingdon and locations to the east
- between numbers 29 and 31 Harwell Road there is a National Grid pylon, the power lines continue eastward across the site to another pylon (located in the southern part of the site)
- the application site is not located within a designated landscape area – the Lowland Vale local landscape designation applies to the site
- the site is not located within a conservation area (boundary is 290 metres to the north) and contains no listed buildings, and is located in Flood Zone 1.

Bloor Homes did not submit Representations on the emerging Local Plan. They were however granted the opportunity to take on the representations submitted by others.

Representations were submitted on behalf of the landowner by London Regeneration Limited, but neither I nor Bloor Homes had any involvement with the content of those representations. London Regeneration have also submitted two planning applications and associated screening opinions affecting the site, as follows.

Application 1 - P16/V0646/O

The application sought the demolition of existing buildings, residential development of up to 354 residential units, a medical centre of up to 650 m² and a community hub/shop/business and retail facility of up to 325 m² together with green infrastructure and two accesses of Harwell Road (all other matters reserved apart from access), and works associated with the development including landscaping, informal and formal open space, creation of a pond, selective tree removal, pedestrian, cyclist and public transport infrastructure, utilities and sustainable drainage infrastructure, car and cycle parking.

The application was submitted on 10th March 2016, but was refused outline planning permission on 10th February 2017. An appeal was lodged, but subsequently withdrawn on 18 January 2018.

Application 2 - P18/V0340/O

The application sought the demolition of existing buildings, residential development of up to 310 residential units, a medical centre of up to 650 m² and a community hub/shop/business and retail facility of up to 325 m² together with green infrastructure and two accesses of Harwell Road (all other matters reserved apart from access), and works associated with the development including landscaping, informal and formal open space, creation of a pond, selective tree removal, pedestrian, cyclist and public transport infrastructure, utilities and sustainable drainage infrastructure, car and cycle parking.

The application was submitted on 8th February 2018, but was refused outline planning permission on 11th June 2018. No appeal was lodged.

Bloor Homes had no involvement in these planning applications. Bloor are embarking on a new approach to explore the development potential of the site.

Bloor homes will continue to promote their site as a genuine credible additional site for much needed new homes and it is our view that the reasons for refusal cited by the LPA are intended to 'make weight'.

We agree with the LPA's view that the planning applications lacked sufficient information, and Bloor would have done things differently. In our view, the site does not have any insurmountable contamination, access or flood risk issues, but we accept that the LPA could not have drawn this conclusion from the submissions made to them.

I believe, as do Bloor Homes, that there is an opportunity now to make a 'fresh start', to draw a line under the site promotion carried out by the previous site promoters, and to think again.

Bloor wish to engage with the local community, the local authority and stakeholders to develop a proposal of the highest quality, to deliver much needed new homes in the locality.

Above all, Bloor Homes wish to assist the LPA by promoting the site, which, in our view, is very well related to the settlement, is situated in a sustainable location for growth, and can deliver significant benefits, including:

- circa 300 high quality new homes
- new homes tailored to reflect the needs of the community and market
- including affordable homes of course
- a new medical centre
- a community hub
- open space
- space for biodiversity
- sustainable transport infrastructure.

Furthermore, we concur with the Council's own assessments in the LP2031 SHLAA Update, which although only assessed half of the site; it concluded that it was suitable in principle for development, subject to access, which of course has been addressed through land assembly.

It is right that such a sustainably located site should be allocated for a high quality housing development and associated community facilities in the future, or could come forward as a windfall site.

We trust that the representations are of assistance, and we look forward to confirmation of receipt in due course.

Yours faithfully



Daniel Wiseman
Director

