

**VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2
PROPOSED MAIN MODIFICATIONS**



March 2019

1. INTRODUCTION

- 1.1 This representation has been prepared by Gladman in response to the current consultation on proposed Main Modifications to the Vale of White Horse Local Plan 2031 Part 2 (the Local Plan). Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure and has numerous land interests in the District.
- 1.2 Gladman welcomes the opportunity to submit comments in response to proposed main modifications to the Local Plan. The comments made in this representation build on those already made through our submitted Hearing Statements and comments made during the hearings themselves. The comments provided relate only to the proposed changes to the wording of policies and supporting text as set out within the Schedule of Modifications published by the Council and are aimed to assist the Inspector in reaching his conclusions on the soundness of the Local Plan.
- 1.3 To clarify, Gladman wish to make comments in relation to the following proposed Main Modifications:
- MM2 – Core Policy 4a: Meeting our Housing Needs;
 - MM7 – Core Policy 14a: Strategic Water Storage Reservoirs

2. PROPOSED MAIN MODIFICATIONS

2.1 MM2 Policy 4a: Meeting our Housing Needs

2.1.1 Gladman notes that the proposed allocation at Dalton Barracks is restricted to the area that can be developed by 2031, however Gladman remains of the view that the site is unlikely to deliver the expected 1,200 dwellings by 2031. The development of the site is subject to considerable infrastructure requirements including education provision, local centre and new transport connections. Also the site is not programmed to be fully vacated by the Ministry of Defence until 2029.

2.1.2 The Council's Housing Trajectory Paper Update (February 2018) Table 2, forecasts that 50 dwellings will be delivered on the site in 2024/25, 100 in 2025/2026 and 1050 over the last five years of the plan period. Gladman has significant concerns that the delivery of 1200 dwellings on this site is not feasible in the plan period. These concerns relate firstly to the lead in time for large strategic sites generally and secondly to the specific circumstances pertaining to this site.

2.1.3 Gladman understands the need for large scale urban extensions and the role that they can play in delivering the long term supply of housing. However it is imperative that the local planning authority is realistic in relation to the delivery and timescales associated with these types of developments. Delays in sites coming forward are due principally to lead in times, gaining outline consent, negotiations on Section 106 agreements, reserved matters applications, discharge of conditions, the need for major infrastructure investments, site clearance and difficulties caused by sites in multiple ownerships. Quite clearly the development of the Dalton Barracks site will be extremely complicated and there are numerous fundamental issues which remain to be resolved. Consequently Gladman consider that there is no prospect of:

- a) the first houses being delivered on site in 2024/25 and
- b) 1200 homes being delivered on site before the end of the plan period in 2031.

2.1.4 There is a high and real risk, therefore, that the delivery of housing on the site during the plan period will be considerably less than anticipated. If that is the case, the Plan does not provide for any contingency. This can be addressed by the inclusion of additional housing allocations in the Plan and by the inclusion of a new policy wording in the plan which would be operational in the event that the requisite supply of housing land could not be demonstrated.

2.1.5 Gladman submits that the following wording should be included in Policy 4a of the Local Plan:

"At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the three/five year land requirement as appropriate, sustainable housing sites that would both make a positive contribution to the three/five year

supply of housing land and be well related to the development limits of settlements of at least the Larger Village classification as defined in Core Policy 3 of the Part 1 Local Plan will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the Local Plan.”

- 2.1.6 An appropriate alternative would be for the Plan to identify a number of smaller and readily deliverable reserve sites that would be able to be brought forward in the event of a 3/5 year land supply not being able to be demonstrated.

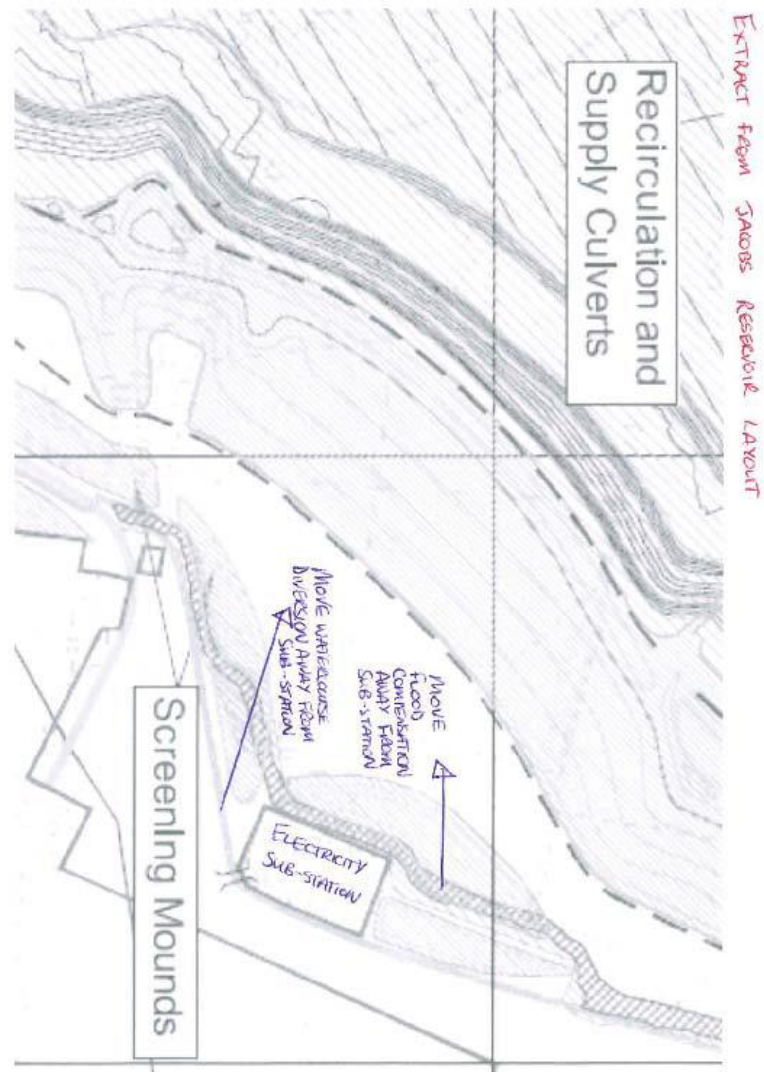
2.2 Main Modification 7: Core Policy 14a Strategic Water Storage Reservoirs

- 2.2.1 Gladman maintains its objection made at the Examination, to the proposed reservoir safeguarded area which impinges on land at Hanney Road, Steventon, which has planning permission for residential development and which is now being built out. (Plan 1 below).
- 2.2.2 At this stage the reservoir is Thames Water’s preferred location if a new large storage reservoir is decided as the means to address its future water resource management in the final 2019 Water Resources Management Plan.
- 2.2.3 In view of the continued uncertainty surrounding this project, Gladman considers that the safeguarding area should be amended to exclude the above mentioned land at Steventon.
- 2.2.4 In its previous submissions Gladman has made reference to the safeguarded area including a major electricity substation and that no buffer to this infrastructure has been proposed. It remains unclear as to whether these proposals have been communicated and/or agreed with the National Grid. Also of concern is the proposal to leave open land immediately adjoining the embankment and to locate the flood compensation lower shelf and a watercourse diversion immediately alongside the electricity substation. The juxtaposition of electricity substations and new watercourses should be avoided. (Plan 2 below)
- 2.2.5 Thames Water also appears to have overlooked an existing Intermediate Gas Main across part of the site (Plan 3 below). In order to address these oversights, Gladman maintains its view that the extent of the safeguarded land be amended to exclude the site being developed for housing and to avoid the above mentioned anomalies.
- 2.2.6 Accordingly, despite the passage of time, this project is yet to advance sufficiently or to properly consider the very real constraints of a gas main, the electricity sub-station and newly constructed residential properties, for it to be safeguarded within the plan at this stage. It is not apparent that consultation with these consultees has yet occurred in order to refine the proposals and we are also not aware of any direct contact with the landowners and undoubtedly there may be a number of landowners who are

Plan 1: Land being developed for residential development, Hanney Road, Steventon



Plan 2: Electricity Substation



Plan 3: Intermediate Gas Main

