

**Hearing Statement
Examination of the Vale of
White Horse Local Plan 2031
(Part 2: Detailed Policies and
Additional Sites)**

Matter 3

Thursday 5 July 2018

Earl of Plymouth Estates Ltd

Representor ID: 1145048

Land West of Steventon Road, Drayton

12 June 2018

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Contents

1.0	Introduction	1
	Context	1
	Overview	1
2.0	Responses to Matter 3	2
	Issue 3	2
3.0	Oxford City Council’s Unmet Housing Need	4
4.0	Dalton Barracks	5
5.0	Changes sought to Local Plan	6

Appendices

Appendix 1: Land West of Steventon Road, Drayton

Appendix 2: Site Location Plan

1.0 Introduction

1.1 This Hearing Statement has been prepared by Lichfields, on behalf of the Earl of Plymouth Estates Ltd (EPEL) (our clients) in relation to Matter 3 identified by the Inspector.

Context

1.2 Lichfields submitted representations on behalf of its client to the Publication Version of the Vale of White Horse (VoWH) Local Plan 2031: Detailed Policies and Additional Sites (Part 2 Local Plan) in November 2017 (2017 representations). The Part 2 Local Plan sets out policies and locations for housing for the VoWH's proportion of Oxford's housing need up to 2031, which cannot be met within the City boundaries and also contains policies on Didcot Garden Town, detailed development management policies to complement the Local Plan 2031 Part 1 (which replace the saved policies of the Local Plan 2011) and also allocates additional development sites for housing.

1.3 This Statement focuses on housing need and supply, including Oxford City's unmet housing need and EPEL's concerns about VoWH's reliance on strategic development sites which bring the prospects of the plan being found "sound" into doubt.

1.4 Their specific interest relates to land west of Steventon Road (see Appendices 1 & 2) within Drayton which is an appropriate location for a modest level of residential development. The site is within the Abingdon-on-Thames and Oxford Fringe Sub-Area which VoWH acknowledge in the Part 2 Local Plan as being the closest Sub-Area and which has the most frequent and reliable public transport linkages to Oxford. VoWH goes on to acknowledge that their agreed quantum of unmet need for Oxford is allocated to this area (para. 2.14 of Part 2 Local Plan).

1.5 Our comments relate to the emerging policy context which may fetter such development coming forward. The technical analysis and design work undertaken to date confirm the site is appropriate for residential development of up to 80 dwellings.

1.6 This Hearing Statement amplifies the earlier representations from our clients. Specifically, it relates to concerns about the VoWH housing strategy, including unmet need from Oxford and the deliverability and timing of strategic development sites, particularly Dalton Barracks.

Overview

1.7 Our clients' concerns are that the emerging VWHLPP is not sound, when assessed against the relevant legislative and NPPF tests. In essence their concerns are:

- There is no agreed comprehensive county-wide strategy to meet unmet housing need originating within Oxford City due to South Oxfordshire District Council (SODC) not agreeing to or signing the Memorandum of Co-operation (signed by other Oxfordshire Councils and other relevant parties). Therefore, there is a shortfall of 1,200 dwellings – some or all of these may be required to be accommodated within VoWH in addition to the 2,200 additional dwellings currently planned for.
- The housing supply proposed in the Part 2 Local Plan is considered to be over reliant on strategic development sites, with doubts about their accessibility/sustainability and potential delivery constraints. This highlights the importance of the plan facilitating smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period.

1.8 We expand upon these concerns in the following sections using the Inspectors numbering.

2.0 Responses to Matter 3

Issue 3

2.1 Our 2017 representations highlighted our concerns regarding the housing strategy, including transparency, housing trajectory and deliverability and sustainability of sites.

Transparency

2.2 The housing allocation figures in draft Core Policy 4a and 8a of the Part 2 Local Plan lack transparency. There is no single table identifying the provision additional 2,200 dwellings arising from the housing need (summarised in Section 2.0 of the representations) which necessitates the Part 2 Local Plan process.

2.3 Core Policy 8a refers to *“the quantum of unmet housing need for Oxford City to be addressed within the Vale of White Horse of 2,200 homes”* before going on to state *“2,020 dwellings will be delivered through additional allocations.”*

2.4 The Abingdon-on-Thames and Oxford Fringe Sub-Area Housing Supply table in both draft Core Policy 4a and draft Policy 8a identify Local Plan allocations comprising 2,020 dwellings and it is not clear how the remaining quantum of unmet housing need for Oxford (180 dwellings) is proposed to be met.

2.5 The Part 2 Local Plan needs to be clear and transparent about the sources and quantum of housing supply that it is relying on to meet housing need. This is also a concern of Oxford City Council and West Oxfordshire District Council within their November 2017 representations.

2.6 Parts 1 and 2 of the Local plan are heavily dependent on a few large strategic sites. These include the following four sites which account for 2,300 dwellings.

- East of Kingston Bagpuize with Southmoor (600 dwellings)
- Dalton Barracks (1,200 dwellings)
- North West of Grove (400 dwellings); and
- Harwell Campus (1,000)

Deliverability

2.7 Recent housing delivery within VoWH is characterised by acknowledged *“under delivery”* which emphasises the necessity in the emerging Local Plan to establish a realistic and robust housing delivery strategy and increases the importance of a realistic supply of deliverable sites within the forthcoming five-year period.

2.8 Having reviewed the Part 2 Local Plan proposals for housing delivery, we are concerned that the new strategic allocations identified above, rely too heavily on the delivery of a few large-scale sites. Large scale sites are not always easy to kick start due to their scale, complexity and (in some cases) up front infrastructure costs.

2.9 This concern is shared by others for example, Oxfordshire County Council (paras. 1-7 of their representations to the Part 2 Local Plan) highlight their concerns about whether necessary infrastructure will be able to be funded and delivered and state that further work is required on infrastructure evidence supporting the Local Plan. Further to this, Thames Water also raise concerns in their November 2017 representations regarding the water supply capability and wastewater network capacity of a number of the strategic sites. Once up and running, there is also a need to be realistic about how quickly the sites can deliver new homes.

Trajectory

- 2.10 The average lead in time for large sites prior to the submission of the first planning application is 3.9 years¹ and the greater the number of homes, the longer the planning approval period becomes. Further to this, large sites are typically not quick to deliver. The average annual delivery on strategic sites of up to 1,499 units barely exceeds 100 units per annum² once construction has commenced.
- 2.11 In their representations to the Part 2 Local Plan, Oxfordshire County Council (para. 11) states that *“the housing trajectory is optimistic with early delivery expected on some sites and good rates of build out on the larger sites”*.

Sustainability

- 2.12 In addition, our preliminary analysis has identified concerns regarding the accessibility, and therefore sustainability, of two of the main allocations within the Part 2 Local Plan (Dalton Barracks and Kingston Bagpuize with Southmoor). The Dalton Barracks site is assessed in more detail in Section 4.0 of this report. Both sites require significant works to the local highway network which is likely to take time and brings into doubt whether the sites will come forward in the plan period, particularly in the short to medium term. Our concerns regarding the timing of delivery of Dalton Barracks are shared by others including Oxford City Council who state in their November 2017 representations state: *“The City Council wish to see some amendments to the Plan to confirm details about the timely delivery of this site and wish to be assured that an infrastructure and housing delivery plan can be provided to offer some reassurance on delivery”*.
- 2.13 We therefore do not consider that the overall housing provision identified in the Part 2 Local Plan is supported by proportionate evidence, that it is deliverable, timely or sustainable. The recent and potential future housing delivery concerns are likely to be exacerbated by the fact that the housing supply identified within the Part 2 Local Plan is considered to be over reliant on strategic development sites including those in inaccessible locations and/or requiring significant infrastructure improvements. This is consistent with Oxfordshire County Council representations (para 20) which state *“In the absence of funded and programmed transport infrastructure it is possible the County Council will object to planning applications for development on allocated sites in its capacity as Highway Authority.”*
- 2.14 This highlights the importance of the Part 2 Local Plan providing a policy framework with a range of smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period. Appendix 1 shows that our clients site is deliverable in the short term.

¹ Lichfields Start to Finish (November 2016) (Survey of 70 Large Housing Sites and 83 Small Housing Sites)

² Ibid

3.0 **Oxford City Council's Unmet Housing Need**

3.1 Our 2017 representations noted that the process for the surrounding authorities in meeting Oxford City Council's unmet housing need is currently being resolved through the Oxfordshire Growth Board (OGB).

3.2 The importance of the Oxfordshire authorities working together is reflected in the Oxfordshire Housing and Growth Deal which was signed in March 2018.

3.3 However, all of the Local Authorities agreed to the level of unmet need apportionment and to sign a Memorandum of Cooperation with the exception of South Oxfordshire DC (SODC). The absence of SODCs agreement to the OGB apportionment means that Oxford City Council's unmet need is not met in full. As a result, VoWH and the other authorities surrounding Oxfordshire may need to make a higher level of housing provision to meet this need as the Duty to Cooperate has not been complied with in full.

3.4 We understand this position has not changed and therefore the 2,200 working assumption for unmet housing need from Oxford within the VoWH Part 2 Local Plan is not fully supported by proportionate evidence and may need to increase if the unmet need is not met in full by other authorities within the OGB.

4.0 Dalton Barracks

- 4.1 Dalton Barracks is seeking to deliver 1,200 dwellings by 2031 (a substantial proportion of the new allocations in the Part 2 Local Plan) along with new infrastructure (such as new schools/local centre/open space).
- 4.2 The Part 2 Local Plan (draft Core Policy 8b) states that all new development at Dalton Barracks will be guided by a comprehensive development framework (published as a Supplementary Planning Document) to ensure its potential as a highly sustainable settlement. The preparation and adoption of the Framework for the site and resolution of the highway and transport issues will take time and therefore housing on the site is unlikely to come forward in the short to medium term and may not come forward during this plan period (up to 2031).
- 4.3 Significant works will also be required to the local highway network as the site is bordered by Wotton Road, Honeybottom Lane, Blackhorse Lane and Faringdon Road, all of which are single carriageway roads which are unlikely to be able to accommodate the uplift in traffic associated with the development proposals.
- 4.4 Access to the site from the east is also poor, with a footway of 1.3 metres only provided on one side of the carriageway on Long Tow which is not compliant with OCC design guidance which for the level of development and potential bus routes would require a minimum of 6.75 metres carriageway together with 2 metre footways. Further to this, pedestrian connectivity, cycle infrastructure and public transport will all need to be improved to accommodate the development.
- 4.5 In light of site constraints, infrastructure requirements and potential impacts we have concerns regarding the appropriateness of the housing allocation at Dalton Barracks. We understand the Barracks may not close until 2029 and the resolution of these issues is likely to take time and brings into doubt whether the site will come forward in the plan period, particularly in the short to medium term. In these circumstances, the reliance on this site to deliver 1,200 dwellings by 2031 is not a justified strategy and is unlikely to be effective and is therefore unsound in its present form.

5.0

Changes sought to Local Plan

5.1

In light of the issues outlined above, the following amendments are sought to the Emerging Plan:

- The emerging Local Plan should fully assess and plan to meet the District’s objectively assessed need and comply with the implications of the duty to co-operate.
- The emerging Local Plan is over reliant on larger strategic allocations to provide sufficient housing land to meet VoWH District’s need. The site should therefore be added to Core Policies 4a and 8a as an additional allocation of up to 80 dwellings.
- A Site Development Template for Land West of Steventon Road, Drayton should be added to Appendix A, Part 4 (Abingdon-on-Thames and Oxford Fringe Area).

5.2

Without the amendments sought above our clients do not consider that the Submission Local Plan can be considered sound particularly with regards to being “*positively prepared*” or “*justified*”.

Appendix 1: Land West of Steventon Road, Drayton

Our clients concerns regarding the reliance on strategic development sites highlights the importance of smaller scale sites which are capable of delivery in the short to medium term of the plan period including our clients site at land west of Steventon Road in Drayton which has the following characteristics:

- The site is located immediately to the west of the established residential development on this side of the village of Drayton.
- The site can be accessed directly off Kiln Lane, a single lane track which runs from the B4017 (Steventon Road). Non-vehicular access from the south is attainable via an existing Bridleway which runs adjacent to Drayton Hall from Lockway, a residential street.
- The site is currently greenfield land and is enclosed by hedgerows to the north and south. A mixed wooded verge runs alongside the western boundary of the site with the A34, whilst the Bridleway to the south runs alongside this boundary. A range of vegetation softens those rear gardens which back onto the site to the east of Lockway.
- The site is in an accessible location with a number of key facilities catering for 'daily needs' within an acceptable walking distance. There are also a number of walking and cycling links available in the area and it is within close proximity to local bus stops off the B4017 which are served by a frequent bus service connecting the site to major employment areas such as Milton Park in addition to Oxford, Abingdon and Didcot Parkway station.
- Vehicle access to the site is off Kiln Lane which connects the site directly to the local highway and onwards to the strategic road network. The site is in an accessible and sustainable location.

The site has been identified as having potential for housing development in various evidence base documents in recent years including the Strategic Housing Land Availability Assessment (2014) and the Part 2 Local Plan Topic Paper 2.

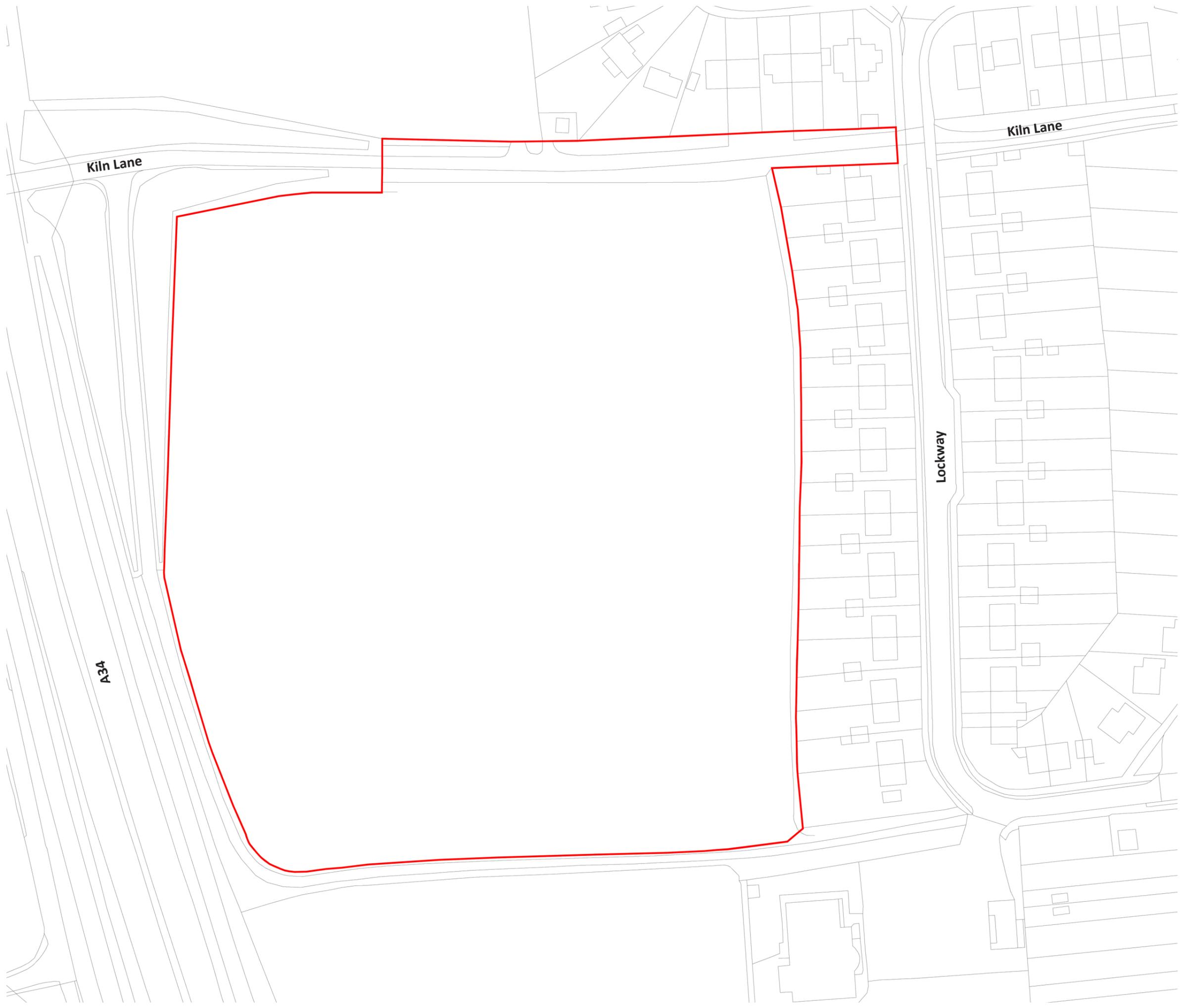
A detailed design assessment of the scope for residential development on the site and potential transport issues has been undertaken and concludes:

- a The indicative masterplan results in a development of up to 80 new homes with a mix of housing across a range of tenures. Informed by the sites constraints and opportunities, the masterplan proposes a central development area framed and visually contained by woodland and open space.
- b The site is well positioned to promote sustainable trips to and from the site owing to its proximity to a number of bus stops within 400 metres of the site and is also within walking distance to a number of local facilities.
- c The potential to deliver up to 80 dwellings should not have a severe impact on the local highway network and would be similar in terms of the quantum of development to other committed developments promoted through Drayton Neighbourhood Plan.
- d Existing local highway constraints surround the site have been recognised by the VoWH and mitigation schemes and the safeguarding of land for the delivery of the Abingdon Bypass and improvements to Steventon lights have been devised.
- e In terms of noise, the provision of buffer planting and additional open space will reduce the total developable area to the east of the A34, however, it will also provide further visual and audible sheltering from the A34 for existing and potential future residents to the west of Drayton.

Overall, Drayton forms a sustainable location and the site is well located in the village. Earlier analysis by VoWH highlighted the suitability, availability and deliverability of the site subject to addressing potential noise, air quality and wider highway constraints. The subsequent analysis

and design work confirms that these matters are capable of resolution and appropriate development of up to 80 dwellings is capable of being brought forward for development within the next 5 years. The site is there in an idea location to contribute to meeting the short to medium term housing need of VoWH including Oxford's unmet need given its location in the Abingdon on Thames and Oxford Fringe Sub Area and proximity to Oxford City. The site should therefore be allocated for residential development in the Part 2 Local Plan.

Appendix 2: Site Location Plan



Key
Site boundary (area 3.52ha)



Project Land West of Steventon Road, Drayton

Title **Site Location Plan**

Client Earl of Plymouth Estates Limited

Date 21.11.2017

Scale 1:1000 @ A3

Drawn by LH

Drg. No PS15864-03-002



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