

**GLADMAN DEVELOPMENTS LIMITED**

**REPRESENTATIONS ON VALE OF WHITE HORSE DISTRICT COUNCIL  
LOCAL PLAN 2031 PART 1 STRATEGIC SITES AND POLICIES  
PUBLICATION VERSION NOVEMBER 2014**



## 1. INTRODUCTION

- 1.1 These representations are made by Gladman Developments Limited (GDL). GDL specialises in the promotion of strategic land for residential development with associated community infrastructure and has numerous land interests in the District. GDL has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.
- 1.2 GDL has considerable experience in contributing to the Development Plan formation process, having made representations on numerous local planning documents throughout the UK and having participated in many local plan public examinations. It is on the basis of that experience that its comments are made in this representation.
- 1.3 The Framework and PPG now provide the policy planning background against which local planning documents are tested, representing a fundamental shift in policy and process against which the adopted Core Strategy was previously examined. Before plans can be considered for adoption they must pass the four tests of soundness as set out by §182 of the Framework. These are that the plan is;
- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
  - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategies priorities; and
  - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.4 In order to determine whether the Vale of White Horse Local Plan Publication Version complies with these requirements, this representation is structured to mirror that of the Local Plan, and set out as follows;
- Core Policy 2: Considering the approach to the unmet housing need for Oxford City in relation to the Duty to Cooperate.
  - Core Policy 4: Considering the effectiveness of the strategy for delivering the housing target.
  - Core Policy 5: Considering the justification for the Science Vale Ring Fence Economic Growth.
- 1.5 The submission also includes a number of available and deliverable sites which should be allocated for residential development in the Local Plan.

## **2. CORE POLICY 2 COOPERATION ON UNMET HOUSING NEED FOR OXFORDSHIRE**

- 2.1 Core Policy 2 recognises that the City of Oxford is unlikely to be able to accommodate all of its housing need within its boundaries and that therefore some of that unmet need may need to be accommodated within the Vale of White Horse District. In that event the Policy proposes that, dependent upon the scale of the unmet need to be accommodated, VOWH Council will either undertake a review of the Local Plan or prepare a new Development Plan Document in accordance with the Spatial Strategy set out in the Local Plan.
- 2.2 GDL contends that this suggested approach is unsound as it would result in a Plan that is not positively prepared and is not in compliance with the National Planning Policy Framework (NPPF) or Planning Practice Guidance (PPG).
- 2.3 Paragraph 182 of NPPF states that local plans *“should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;”*
- 2.4 Through the Oxfordshire Growth Board, all Oxfordshire Districts, including Vale of White Horse Council, have agreed in principal to meeting Oxford City’s unmet housing needs. The 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) found that there is a need for between 24,000<sup>1</sup> and 32,000<sup>2</sup> new homes in Oxford between 2011 and 2031. A Strategic Housing Land Availability Assessment (SHLAA), commissioned by Oxford City Council but overseen by the Growth Board, was published in December 2014. The SHLAA concludes that there is capacity within the City for 10,212 dwellings for the period 2011 to 2031. This, therefore, represents a shortfall in supply of between 13,788 dwellings and 21,788 dwellings when compared to the SHMA findings.
- 2.5 Whilst the apportionment of this unmet need between the four other Oxfordshire Districts has yet to be agreed, it would be a reasonable assumption to make at this stage that each Council, including Vale of White Horse, might each be expected to accommodate 25% of the unmet need. Taking the lowest shortfall figure of 13,788 dwellings, this would equate to an additional 3,467 dwellings for each of the four Councils for the period 2011 to 2031. Added to Vale of White Horse’s own housing needs (20,560), this would give a minimum revised housing requirement of approximately 24,000 new dwellings for the period 2011 to 2031.
- 2.6 GDL contends that VOWH’s current intention to defer addressing Oxford’s unmet housing needs to a future review of the Local Plan or to the preparation of a new Development Plan Document is not an acceptable way of dealing with this issue. The need to address the substantial unmet housing need in Oxford is urgent and should be dealt with now. The Local Plan is therefore not effective, is inconsistent with NPPF, is not positively prepared and cannot therefore be considered to be sound.

## **3. CORE POLICY 4: MEETING OUR HOUSING NEEDS**

- 3.1 Core Policy 4 proposes to deliver at least 20,560 homes between 2011 and 2031. Of this figure, 5,200 dwellings are either completions since 2011 or commitments. The strategic

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<sup>1</sup> Low

<sup>2</sup> High

sites allocated in the Local Plan are expected to account for 13,960 dwellings during the plan period. The Local Plan Part 2 and future Neighbourhood Plans are anticipated to deliver up to a further 1000 dwellings and a windfall contribution of 900 dwellings is also expected.

- 3.2 22 Strategic Site Allocations are identified in the Plan. A minimum capacity of 200 dwellings is necessary for a site to be termed 'strategic' although there is no explanation in the Plan of why this particular capacity threshold has been decided upon nor does the Housing Topic Paper provide any explanation of why smaller allocations of, say, 100 dwellings are not appropriate as strategic allocations. Of the 22 strategic sites, 8 may be considered to be large scale, having an estimated capacity of over 500 dwellings and three of these (Crab Hill Wantage, Grove Airfield and Valley Park east of Didcot) each have a capacity of over 1,500 dwellings.
- 3.3 The Council's Housing Delivery Trajectory set out in Table 3.4 of the Local Plan Topic Paper 4 'Housing' sheds further light on the expected delivery of these sites. It is noted that in the Trajectory three of the strategic sites, namely Crab Hill (capacity 1,500 dwellings), Land East of Coxwell Road (200 dwellings) and Grove Airfield (2,500 dwellings), are all subject to resolutions to grant outline planning permission subject to the completion of a Section 106 agreement. Nevertheless all three sites are expected to begin delivering housing completions in 2015/16.
- 3.4 The 18 remaining strategic sites are all expected to begin delivering houses in 2017/18 with the exception of Monks Farm, Grove (capacity 617 dwellings), which is expected to commence delivery in 2018/19. All 22 sites are expected to be fully completed during the Plan period.
- 3.5 Whilst GDL generally agrees with the concept of large scale urban extensions as this generally conforms to the objectives and key themes set out in NPPF, it is imperative that the local planning authority is realistic in relation to the delivery and timescales associated with these types of developments.
- 3.6 Research carried out by Hourigan Connelly on behalf of GDL concerning the development of strategic sites (i.e. sites of over 500 dwellings) in the UK has shown that, on average, there is a lead in time of approximately 8 years from the grant of outline planning permission to the commencement of development. (See Appendix 1). The research found that delays in sites coming forward are due principally to negotiations on Section 106 agreements, the need for major infrastructure investments and difficulties caused by sites in multiple ownerships.
- 3.7 Indeed one of the case studies included in the Hourigan Connelly study was Grove Airfield, one of the strategic sites allocated in the Local Plan Publication Version. This site was first allocated in the Vale of White Horse Local Plan in July 2006. Supplementary Planning Guidance to guide the development of the site was published at the same time. An outline planning application for the site was submitted to the Council in February 2012 and the Council's Planning Committee resolved to grant permission subject to the completion of a Section 106 agreement on 4<sup>th</sup> December 2013. The legal agreement requires, inter alia, the provision of a southern access road and, before the delivery of the 150<sup>th</sup> unit, the construction of a northern link road.

- 3.8 Clearly this site, which even now has not yet received planning approval, has taken many years to come forward. It is now over 8 years since the site was first allocated and almost three years since the outline planning application was submitted.
- 3.9 As a further illustration of the timescales involved in dealing with complex applications, the outline planning application for Crab Hill, Wantage was submitted in August 2013 and to date, despite a resolution to grant permission, has not yet received planning approval some 16 months later.
- 3.10 GDL submits that the Trajectory is completely unrealistic and fails to take into account the extremely long lead in periods for large strategic sites to come forward. Given that the three sites awaiting the completion of legal agreements are granted approval will still have to go through reserved matters applications and discharge of pre commencement planning conditions, the likelihood of any dwellings being completed on these sites during 2015/16 is remote and, whilst there potentially could be some contribution in 2016/17, this is likely to be considerably less than currently predicted.
- 3.11 Similarly in respect of the remaining 18 strategic sites which have as yet to get to the planning application stage, these are unlikely to commence delivering a significant level of housing completions until 2019/20 at the earliest and the development of the larger sites at Monks Farm, Valley Park, and North Abingdon are unlikely to be commenced until later and realistically will not be fully developed during the Plan Period.
- 3.12 A major adjustment to the Housing Delivery Trajectory is therefore required and this has significant implications for the soundness of the Plan. NPPF<sup>3</sup> requires local Planning authorities to be able to demonstrate a supply of deliverable sites sufficient to provide at least five years housing supply based on the Local Plan target. It also requires an additional 20% buffer to be applied brought forward from later in the Plan Period where there has been a persistent under delivery of housing in previous years as has been the case in VOWH.
- 3.13 PPG also requires that any previous housing under provision should be made up in the first five years of the plan wherever possible.
- 3.14 By its own admission, even the unrealistic housing delivery trajectory set out by VOWH, only delivers a five year supply of housing in the first five years of the plan if the 20% buffer is not applied and if the previous housing under provision is made up over the whole plan period rather than the first five years. Even in this scenario, a five year supply is not achieved until 2017/18<sup>4</sup>.
- 3.15 However if a realistic Housing Delivery Trajectory was applied as discussed above, it is unlikely that a five year supply would be achieved until 2019/20 at the earliest. Furthermore if the 'first five years' was taken from the date of adoption of the Plan rather than 2011, which arguably it should, the situation becomes much more serious in terms of providing a five year land supply.
- 3.16 As it stands the Local Plan falls well short of the Government's objective of significantly boosting housing supply as set out in NPPF and will not provide sufficient housing to meet

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<sup>3</sup> Para 47

<sup>4</sup> Table 3.3 Housing Topic Paper

the objectively assessed needs of the District. In this respect the Local Plan cannot be considered to be positively prepared, effective or consistent with national policy.

- 3.17 Notwithstanding the need to identify additional sites to meet VOWH share of Oxford City's unmet housing need, there is a fundamental need for the housing supply in the early years of the Local Plan to be significantly increased. This is particularly important given that the allocation of further non-strategic sites will take place in the Part 2 Local Plan which itself is not scheduled to be adopted until the end of 2017. If this timetable is adhered to development on sites allocated in the Local Plan Part 2 is not likely to commence until 2019 at the earliest. In order to ensure that the Local Plan Part 1 provides an effective mechanism to deliver sufficient housing to meet the full objectively assessed housing need and provides a rolling five year supply of deliverable housing sites, there is a need for the allocation of additional readily available and sustainable sites.
- 3.18 In addition to allocating additional strategic sites, the Local Plan Part 1 should seek to achieve an increase in housing supply in the early years of the Plan to ensure a continuous 5 year supply of housing land including a 20% buffer and meeting the previous years shortfall in the first five years of the Plan. This should be achieved by the inclusion of a new policy which allows for planning permission to be granted for smaller sustainable and immediately available unallocated sites on the periphery of the market towns, local service centres and larger villages. This would replace the proposed presumption against development outside the built up areas of Market Towns, Local Service Centres and Larger Villages which is contained in Core Policy 4 and which is contrary to NPPF which is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable and sustainable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by NPPF. Planning Practice Guidance<sup>5</sup> also advises that *"all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence"*.
- 3.19 GDL has interests in a number of sustainable and immediately available sites in Faringdon, Shrivenham, East Hanney, Steventon and Uffington all of which would assist in boosting housing supply in the early years of the Local Plan. Details of these sites are set out in Section 5 of this submission.

#### 4 CORE POLICY 5 HOUSING SUPPLY RING FENCE

- 4.1 Core Policy 5 provides for a 'ring fence' approach to housing supply in the Science Vale growth area on the basis that it will help ensure that jobs, homes and infrastructure are provided together. The ring fence includes settlements in the Science Vale where strategic sites for housing and employment are allocated.
- 4.2 GDL has serious reservations regarding the principle of ring fencing as proposed in the Local Plan. The strategy for the Science Vale heavily reliant on the development of several large strategic allocations. This is confirmed in Para 4.13 of the Housing Topic Paper which notes

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<sup>5</sup> PPG Rural Housing Ref 50-001-20140306

that “..many of the sites within the Science Vale are large, rely on large infrastructure, and are expected to deliver over the plan period as a whole, rather than in the short term”. As set out in Section 3 of these submissions, GDL has serious concerns as to whether these allocations can realistically be delivered within the timescales envisaged by the Council. If these concerns are borne out, the application of the ring fence policy would not enable the Council to have flexibility to achieve a higher rate of housing development in the remaining part of the District to compensate.

- 4.3 GDL therefore submits that in order to achieve its objectives for housing supply across the District and to provide for contingency in the event that large sites in the Science Vale do not come forward in the timescale expected, it will be absolutely essential for the Council to direct further growth to sustainable locations in the rest of the District.
- 4.4 Whilst it is acknowledged that there should be a correlation between the number of dwellings provided and the number of jobs likely to be created across the District as a whole, it is unrealistic to expect that everyone employed in the Science Vale will also wish to live there.
- 4.5 Notwithstanding the above, if the principle of the Policy is ultimately found to be sound, GDL considers that its extent of the area to which it would apply should be widened. In Paragraph 5.10 of the Housing Topic Paper four alternative options are considered in terms of coverage. GDL considers that Option A in which the ring-fence would apply to the whole of the Science Vale within VOWH would be most appropriate. In the likely event that the delivery of large housing allocations in the Science Vale are delayed or do not happen at all, it offers the greatest scope for alternative smaller deliverable and sustainable sites to come forward.

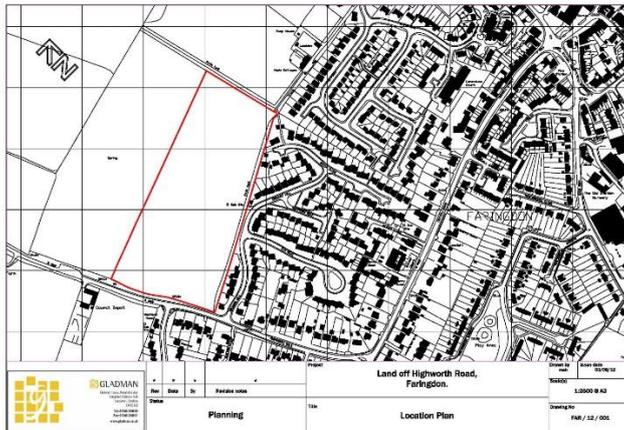
## **5. SUGGESTED SITES**

- 5.1 In context of the overriding need for a substantial increase in the number of housing allocations in the district to ensure that needs can be met in full, 5 sites for housing at Faringdon, Shrivenham, Steventon, East Hanney, Uffington are submitted as sustainable, deliverable allocations for inclusion in the Local Plan.

### **Highworth Road, Faringdon**

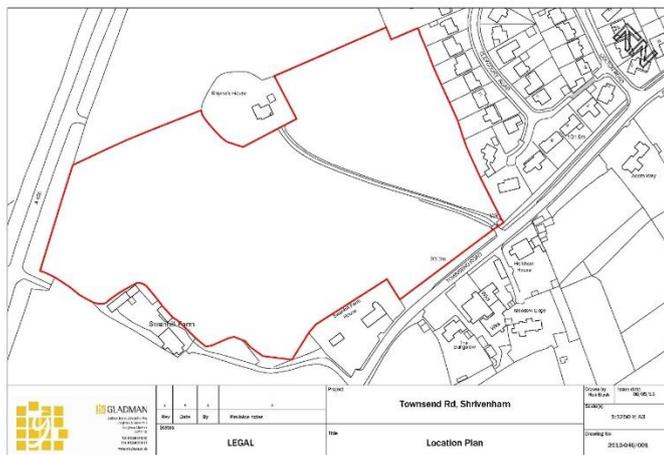
- 5.2 The site at Highworth Road, Faringdon is considered to be a sustainable location for residential development, being located adjacent the settlement boundary of Faringdon, which is identified in the settlement hierarchy as a Market Town. The site at Highworth Road is adjacent to an allocated site to the south and contains similar characteristics to this site. The site is 5.5 hectares and would be able to deliver approximately 100 dwellings.
- 5.3 The site is not subject to flooding, is in agricultural use and is under single ownership. It is deliverable within the first 5 years of the plan period.
- 5.4 Although the land is located within the North Vale Corallian Ridge landscape character area an appropriately designed housing scheme on this site will not have adverse effects on the landscape character of the area.
- 5.5 The site is referenced in the SHLAA as FARI01, however GDL strongly contests the assessment of this site as having heavy constraints which make the site unsuitable for development. We refer Council to the Inspectors report for the 2006 Local Plan where the site was assessed as having similar constraints to the site south of Highworth Road, which

is now being put forward as an allocated site. The site is a sustainable location for development and is both available and achievable.



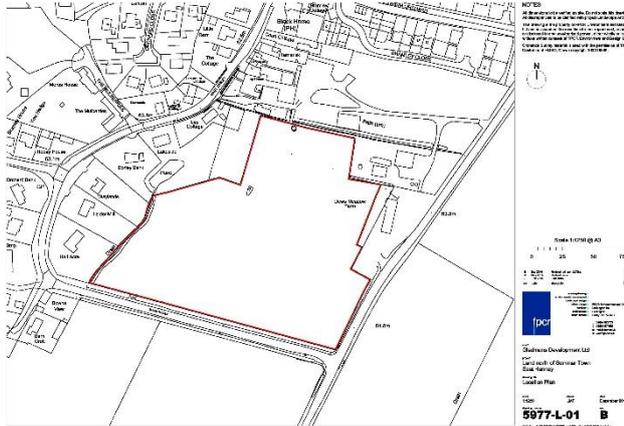
### Townsend Road, Shrivenham

- 5.6 The site at Townsend Road, Shrivenham is considered to be a sustainable location for residential development, being located adjacent the settlement boundary of Shrivenham, which is identified in the settlement hierarchy as a 'Larger Village.' The site is 4.8 hectares and would be able to deliver approximately 100 dwellings.
- 5.7 The site is not subject to flooding, is in agricultural use and is under single ownership. The site is not subject to any constraints and is deliverable within the first 5 years of the plan period.
- 5.8 Although the land is within the Lowland Vale landscape character area, an appropriately designed housing scheme would not have any adverse effects to the landscape character of the area.
- 5.9 The site forms the southern section of Site 03\_14 as identified in the 2014 SHLAA update and is considered to be suitable in principal for development. The development of the site would form an appropriate extension to the western edge of Shrivenham within close proximity to the village centre and local amenities. The development of the site would not result in the coalescence of neighbouring settlements and would reinforce the existing vegetation to the site boundaries to form an appropriate and well-designed development on the village edge.



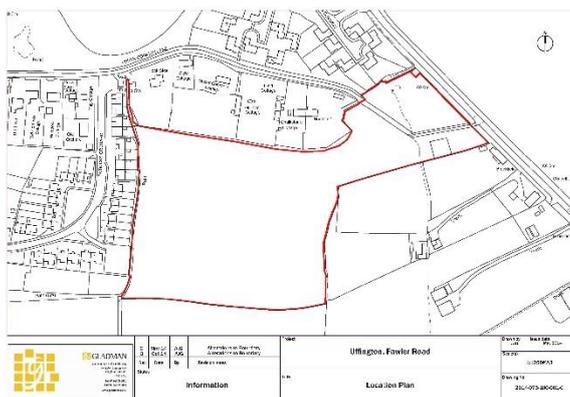


- 5.16 The site is currently in agricultural use and is in single ownership. It is available for development and deliverable within the first five years of the Plan period. The site is identified as EHAN07 in the 2014 SHLAA update in which it is assessed as developable in principle.



### Fawler Road, Uffington

- 5.17 The site is located on the southern fringe of the village of Uffington and would form a logical extension to the built up area. The site situated within easy walking distance of the facilities and amenities in the village.
- 5.18 The site is approximately 3.5 hectares, in agricultural use and could accommodate in the region of 45 dwellings. It is in single ownership, is available for development and would be deliverable in the first five years of the Plan period. The site forms the northern part of site UFF105 in the 2014 SHLAA update in which the site is assessed as developable in principle.



## 6. SUMMARY

- 6.1 Through these representations GDL has highlighted fundamental concerns with the Vale of White Horse Local Plan Part 1 Publication Version. These concerns relate to issues that are **fundamental to the strategy that underpins the Plan**. Therefore in its current form the document cannot be considered sound.

6.2 To be considered sound at Examination the Local Plan needs to meet all four of the soundness tests set out in paragraph 182 of the Framework:

*“A local planning authority should submit a Plan for Examination which they consider is ‘sound’ – namely that it is:*

- **Positively prepared** – *the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with policies in the Framework.”*

6.3 With regard to Core Policy 2, GDL contends that the proposed approach of deferring meeting Oxford’s unmet housing need to a future review of the Local Plan or to a new Development Plan Document means that the Local Plan is **not effective, is inconsistent with NPPF and is not positively prepared**. The Local Plan should make a reasonable assumption of the degree of Oxford’s unmet need that it should meet which would be at least 3,467 additional dwellings for the period 2011 to 2031.

6.4 The housing delivery strategy set out in Core Policy 4 is unduly reliant on large strategic sites. Because of the complex nature of large sites which often are subject to significant infrastructure requirements, in most cases there is a significant time period between allocation and the actual delivery of housing on site. Research carried out on behalf of GDL indicates that this can often be 8 years. As a consequence the Council’s Housing Trajectory is completely unrealistic in its assumptions regarding housing completions in the early years of the Plan. The Local Plan will fail to meet the NPPF objective of significantly boosting housing supply and will not provide sufficient housing to meet the objectively assessed needs of the District. **It is therefore not positively prepared, effective or consistent with national policy.**

6.5 The proposed ‘ring fence’ approach to housing supply set out in Core Policy 5 is flawed in that it is probable that the delivery of the large housing allocations in the Science Vale will be delayed or will not take place at all. As a consequence the ring fence policy will not provide the flexibility for a higher rate of housing development to occur in the rest of the District to compensate. The Local Plan will therefore not be **effective** because of the resulting failure to deliver the expected amount of housing.

6.6 In order to meet the objectively assessed need for housing in the Plan Period and to ensure that there is a boost to housing supply in the early years of the Plan it is essential that the Local Plan allocates additional smaller deliverable and sustainable sites for housing and provides a policy mechanism for the release of smaller sustainable and immediately available sites on the periphery of Market Towns, Local Service Centres and Larger Villages.