

Our ref: P18-1179

Your ref: Representor ID - 776299

12th June 2018

Mr David Reed (Planning Inspector)
c/o Mr Ian Kemp (Programme Officer)
Vale of White Horse Local Plan Part 2
16 Cross Furlong
Wychbold
Droitwich Spa
Worcestershire
WR9 7TA

Dear Mr Reed

RE: RESPONSE TO INSPECTOR'S MATTERS AND QUESTIONS – MATTERS 3, 4 AND 5

This submission is made on behalf of Linden Homes in response to the Inspector's Matters and Questions to be discussed through the examination of the Vale of White Horse Local Plan Part 2 ('the Local Plan'). Linden Homes controls the site **Land South of Summertown, East Hanney**, to which this submission relates.

It addresses the following:

- Question 3.3 – Housing provision and distribution
- Question 4.1 – Proposed housing allocations in Abingdon and Oxford Fringe Sub Area
- Question 5.8 – Dalton Barracks Deliverability.

Questions 3.3 and 5.8 – Housing Strategy Delivery and Delivery of Dalton Barracks

Whilst the two questions asked are listed under separate matters, it is considered that the response outlined below is interrelated and therefore relevant to both questions. We do not offer consideration of the total overall housing provision proposed, its distribution between the sub areas, or the specific provision to the other sub areas, and instead focus

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on how this provision is to be delivered, specifically in relation to the Abingdon and Oxford Fringe Sub Area (AOFSA).

It is considered that the delivery of the additional housing proposed in the Local Plan is too heavily reliant on the delivery of Dalton Barracks. The Dalton Barracks site represents 35% of the total housing delivery proposed in the Local Plan, and 60% of the housing for the AOFSA. Whilst the proposed allocation did not form part of the housing strategy set out in the Local Plan Part 1 is not necessarily considered an issue for its allocation in the Part 2 Local Plan. There are strong concerns over the reliance on such a strategic scale site; it leaves the council very little 'room for manoeuvre' in delivering housing were any issues to arise with the site's delivery.

The Local Plan requires that some 3,420 dwellings are provided over the remaining 14-year period for the plan, equating to just over 244 dwellings per annum. However, the housing trajectory set in HOU03.1 shows that the proposed allocations are only anticipated to delivery housing for the last 12 years, meaning that there is already a two-year backlog. This increases the annual housing requirement for the remainder of the plan period to 285 dwellings, but the trajectory shows that delivery from the allocations is not anticipated to meet the 285 dwelling annual requirement until 2024/25, some 6 years later, when Dalton Barracks has reached its suggested peak delivery rates. This continued deficit will result in an annual requirement of 350 dwellings per annum for the remaining 7 years of the plan period. At peak delivery, Dalton Barracks is shown in the housing trajectory to be providing 200-225 dwellings per annum, representing over 60% of the total annualised requirement in the Local Plan.

When considering the AOFSA in isolation some 168 dwellings per annum are needed over the 12-year period shown in the housing trajectory. This figure is not reached until 2025/26, by which time there will be a backlog and an increased annual requirement of just under 217 dwellings per annum. From this point, all but a small amount of housing is anticipated to come from Dalton Barracks.

Therefore, we question whether such an approach is actually deliverable, in answer to question 3.3. Considerable pressure is placed on the delivery of Dalton Barracks, and we have strong concerns as to whether Dalton Barracks can deliver as the trajectory shows, for the following reasons:

- 200-225 dwellings per annum is considered to be a very high delivery rate even if multiple housebuilders are on site together. This level would more than likely flood the market in such a localised area, and therefore housebuilders are unlikely to build at such a rate.

- Housing completions by 2024/25 is considered unrealistic given that the Statement of Common Ground for Dalton Barracks (SCG17) states that development of the site can begin in 2024; there would be significant demolition, site preparation and infrastructure to provide before housing delivery was likely. That also assumes no delays with the decommissioning of the barracks with the MoD.
- The planning process will also not be straightforward and will inevitably take a considerable amount of time. The Local Plan draft allocation requires Supplementary Guidance to be produced - there is significant masterplanning to be undertaken which will have to provide for the full development of the site of approximately 4,000 dwellings, not just the 1,200 dwellings which are included in the plan period. The planning application process, together with the discharge of conditions, will also take a significant amount of time given the complexities of the site. There will, inevitably, also be a significant requirement for infrastructure provision.

If delivery of Dalton Barracks slips by even a year, which is considered entirely plausible given the scale of the site, this will have significant impacts on the Council's ability to meet the sub area housing requirements.

In addition, we also have concerns with regards to the delivery of Kingston Bagpuize, which we outline in detail below in the response to Question 4.1, and the proposed allocation at Harwell Campus – these were set out in detail in the Linden Homes Representations as part of the Regulation 18 consultation.

It is therefore considered that there are significant concerns as to whether the proposed housing delivery set in the Local Plan can be achieved. We would argue that there is an overreliance on large scale strategic sites and we remain to be convinced by the documentation provided that they can be delivered as proposed, particularly in respect to the rates housing completions and the speed that development can commence on site.

Recommendation

As such, we consider that an alternative approach to meeting housing needs should be provided which includes allocations for additional smaller sites to provide housing in the short and medium terms of the plan period. There is too heavy a reliance on the strategic scale sites which will not deliver until later in the plan period, meaning a deficit in housing provision will result in the earlier part of the plan period.

This approach is being proposed by the Government through the Draft NPPF, which includes, at paragraphs 69 to 70, guidance to increase the usage of small sites in delivering

housing. This has been carried forward from the Housing White Paper. The Government's intent is to reduce the reliance on large scale strategic sites which are complex and slow to deliver.

In this regard, it is considered that Land to the south of Summertown, East Hanney should be included as a proposed allocation for approximately 100 dwellings. Further detail of this site is provided below in response to Question 4.1, and in previous Linden Homes representations at the Regulation 18 stage.

Question 4.1 – Housing Allocations

In reference to the question asked regarding whether the proposed housing allocations are the most appropriate when considered against alternatives, we would make the following points:

North East of East Hanney

With regards to the proposed allocation at North East of East Hanney for approximately 50 dwellings, we fully support the inclusion of the site. Linden Homes has been working closely with the Council to develop the proposals and have produced a Statement of Common Ground for its delivery. A separate response has been submitted addressing this site allocation.

East of Kingston Bagpuize with Southmoor

Whilst we do not necessarily question the suitability of the site for allocation, we do have concerns as to the deliverability of the site in the timeframe put forward by the council in the Housing Trajectory Paper Update (HOU03.1). The trajectory suggests that housing completions will be delivered from 2020/21, with 100 dwellings per annum being delivered from 2021/22 for five consecutive years.

Representations submitted in support of the site (ID: 1097637) indicate that the site is optioned to a single developer/housebuilder, so we would question whether they could build at a rate of 100 dwellings per year, or would want to deliver at that rate – it is a significant number of homes to be introduced on to the market in one area.

This is particularly the case given that there is currently as scheme under construction at East of Kingston Bagpuize (application ref: P17/V0662/RM) providing a total of 280 units. It is only anticipated that this current scheme will deliver 50 units per year. This will continue into the year 2023/24 based on the council's latest Housing Supply Statement (April 2018).

In addition, based on the housing trajectories, this current scheme will overlap with the additional development of the proposed allocation, meaning that 150 units per year are anticipated to come from this small area. Even with more than one housebuilder on site, this rate of delivery is considered unrealistic. It is therefore anticipated that delivery of the proposed allocation would actually slip, rather than the localised housing market being flooded with such a high level of new housing.

It is also suggested that the delivery of the first housing completions on the site will slip due to the relatively short period given in the housing trajectory. Completions are expected to be delivered in the period 2020/2021 and, irrespective of the current development on site in this location, this is considered a short period of time to get such a strategic scale development on site. The same timeframe is given for both proposed allocations in East Hanney which are much smaller and arguably much more straightforward schemes to deliver. The proposed allocation at East of Kingston Bagpuize requires significant highways improvements, a new primary school, has overhead powerlines, and is more sensitively located in relation to the Conservation area and setting of Kingston Bagpuize House and Park. It is therefore likely to take longer before housing completions are realised.

Recommendation

It is therefore considered that this gives further justification for additional smaller sites to be allocated in the plan period in order to relieve the pressure for two strategic developments to deliver housing at overly high rates.

Proposed allocation, North East of East Hanney, should be retained as one of the few smaller sites proposed in the Local Plan.

Land to the south of Summertown, East Hanney

It is considered that one additional smaller site for inclusion as an allocation in the plan should be Land south of Summertown, East Hanney. It is a deliverable alternative to the complete reliance on two large strategic sites to deliver the vast majority of the sub area's housing.

The Linden Representations from the Regulation 18 consultation set out the full case for the inclusion of the site for housing development, but we summarise the main points again, below:

- The site is located at East Hanney, which is a larger village and clearly a sustainable location for additional housing growth.

- The site was assessed through Part 1 of the Local Plan as being suitable for allocation of up to 200 units. The conclusions drawn by the council in Topic Paper 3 Strategic Site Selection (November 2014) confirm that:

"The site is proposed for allocating as it is strategically well located on the A338 with good quality public transport and potential for future improvements by means of a dedicated cycleway south to Grove and to the land safeguarded for the provision of a new railway station. The site is sufficiently large enough to accommodate ample buffering of Flood Zones 2 and 3 on the Western boundary. This should also address ecology concerns with the Letcombe Brook."

- The council has re-assessed the site through Part 2 of the Plan in Topic Paper 2 – Site Selection, but this assessment is not a true representation of the proposals being put forward by Linden Homes. It considers a far larger area of land than previously proposed through Part 1 of the Plan. Having taken on board the Inspector’s comments, Linden is now proposing a smaller area of land for development and an allocation of circa 100 units – see illustrative concept masterplan at **Appendix A**.
- The applications for approximately 400 units were recommended for approval at East Hanney on 25th November 2015. Although these applications were refused at committee, it demonstrates officer acceptance that East Hanney can accommodate significant housing growth above and beyond that already proposed to be allocated in Part 2 of the plan.
- Allocation of Land South of Summertown would provide the additional benefit of a community nature reserve and the opportunity to enhance and properly manage the Letcombe Brook Corridor along its western boundary - an Outline Habitat Restoration Plan and Outline Ecological Management Plan was agreed as part of the previously refused planning applications.
- The site is located in a sustainable location with good links into the village facilities. The site is also conveniently located for easy access to the wider public transport network, including the land safeguarded for the new Grove Train Station.
- The smaller scheme now being proposed by Linden would also address the concerns previously raised by the Inspector by enabling a lower density scheme, which better relates to the edge of village location, and which will include extensive landscaping to enhance the approach to the village.

- There were no technical objections to the previous scheme nor any technical reasons for dismissal of the appeal identified by the Inspector. As demonstrated previously, all technical issues regarding drainage, highways and access can be suitably dealt with.

Recommendation

In view of the above, it is considered that an allocation of Land to the south of Summertown, East Hanney should be included for residential development of approximately 100 dwellings, based on Linden's revised proposals.

Participation in the EiP Hearings

In respect to the Examination Hearings, scheduled for July, Linden Homes requests to participate in the session addressing Matter 4: Abingdon and Oxford Fringe Sub Area, East Hanney Sites, currently scheduled for the morning of Tuesday 24th July. We would be grateful for your confirmation of Linden Homes' participation.

Your sincerely



Joanne Jones
Associate
Pegasus Group

Appendix A – Proposed Masterplan at Land South of Summertown, East Hanney



DETAILS TO BE AGREED WITH
LETCOMBE BROOK PROJECT AND
CONTROLLED VIA PLANNING
CONDITION

Total units = 197

House Type	No of Bedrooms	Sqft	No	Total Sqft
1B FLAT	1B	508	2	1016
2T 754	2B	754	25	18850
3T 838	3B	838	5	4190
3T 949	3B	949	3	2847
3T 991	3B	991	3	2973
3D 1030	3B	1030	15	15450
3D 1041	3B	1041	11	11451
3D 1187	3B	1187	14	16618
4D 1352	4B	1352	4	5408
4D 1371	4B	1371	6	8226
4D 1418	4B	1418	4	5672
4D 1564	4B	1564	8	12512
4D 1868	4B	1868	2	3736
5D 1812	5B	1812	9	16308
5D 2236	5B	2236	5	11180
5D 2283	5B	2283	2	4566
TOTALS			118	140503

Private housing plot areas (sqft) 140503

House Type	No of Bedrooms	Sqft	No	Total Sqft
A11 (1B FLAT)	1B	543	8	4344
A23 (2B4P)	2B	855	45	38475
A33 (3B5P)	3B	1011	16	16176
A41 (4B6P)	4B	1142	7	7994
4B (4B6P)	4B	1142	3	3426
TOTALS			79	70415

Affordable housing plot areas (sqft) 70415

SITE TOTALS	
Total units	197
Total housing plot areas (sqft)	210918
Total net developable area (acres)	14.11
Total coverage sqft/acre	14948

NOTES

This drawing is the copyright of Thrive Ltd ©. All rights reserved. Licence No. 100007359. DO NOT scale from this drawing. Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect. Where applicable this drawing is to be read in conjunction with the Consultants' drawings.

REV	DESCRIPTION	DATE	AUTHOR	CHKD
A	PLOTS 100, 108 & 109 REMOVED, plot 123 changed to a 3D1041, plots 106 & 107 changed to 4D1564, plot 12 changed to 3D1030, plot 140 changed to 5D1812, convert to plot 144 & double garage to plot 135 changed to a single garage, plots 124, 164, 165 handed and plots 141-143 & 145 repositioned.	14/10/15	SR	--



PLANNING



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PROJECT
Summer Town
East Hanney
For : Linden Homes Thames Valley

DRAWING
Site Layout

SCALE	DATE	AUTHOR	CHKD
1:500 @ A0	Aug 2015	SR	--
JOB NO.	DRAWING NO.	REV	
LIND140901-SW	SL.02	A	

CLIENT REF.