

**VoWH LPP2 EIP - Statement for Matter 3 for
David Wilson Homes (Southern)
Tulwick Park, Grove**

June 2018

Turley

Contents

1.	Introduction	1
2.	Response to Matter 3: Overall housing provision in the plan and its distribution between sub-areas	4

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Client

David Wilson Homes

Our reference

DAVR3005

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1. Introduction

- 1.1 This Statement is submitted on behalf of David Wilson Homes (Southern) (hereafter referred to as DWS) in relation to Matter 1 (Duty to Co-operate and other legal requirements) of the Vale of White Horse Local Plan Part 2 (LPP2) Examination.
- 1.2 DWS is promoting land to the east of Grove (hereafter referred to as land at Tulwick Park, Grove) for development, more details of which are contained at **Appendices 1 and 2** of the Turley Statement on behalf of DWS on Matter 1. Further information is provided in earlier representations submitted on behalf of DWS. The site extends from the railway line at its northern boundary to Tulwick Lane at its southern boundary. The A338 is located to the west. Grove Park Drive passes through the site.
- 1.3 This land was promoted by DWS at the LPP2 Preferred Options stage earlier in 2017 as 'Land at Grove Park, Grove'. Comprehensive representations, supported by a suite of technical documents, including a Vision Document and a report prepared by Turley entitled "Sustainability Appraisal" were submitted in November 2017 at the Local Plan Publication stage.
- 1.4 Those earlier representations provide a detailed justification as to the reasons why land at Tulwick Park, Grove should be allocated and as such that explanation is not repeated in these Statements.
- 1.5 Since that LPP2 Preferred Options stage, DWS has engaged with Grove Parish Council, Wantage Town Council, Network Rail and Stagecoach and has undertaken its own research to inform the proposals for the site.
- 1.6 The land promoted by DWS extends to 47.4 hectares and the site is capable of delivering:
 - Up to 600 homes (as part of a phased development);
 - Typical housing mix consisting of detached, semi-detached and terraced family homes;
 - The creation of land for employment uses;
 - A community hub which would provide a building in use class D1 which could provide a for a range of community uses, such as a medical facility as well as local retail opportunities to serve the residential and employment uses;
 - A park and ride facility;
 - A 1 form of entry primary school (which could be extended to 2 forms of entry);
 - Other non-residential uses include playing pitches, play areas and a productive landscape;

- The delivery of road, pedestrian and cycle access between the A338 and an area of land which would be safeguarded for the delivery of the reopened Grove railway station; and
 - Safeguarded land for delivery of the reopened Grove railway station, helping to facilitate this long term aspiration through the delivery of new infrastructure and improved access.
- 1.7 This site is not dependent upon the prior delivery of any adjacent sites which must come forward before it is delivered and is not reliant upon any other schemes in order for necessary accesses to be provided.
- 1.8 The representations submitted on behalf of DWS explain how the land at Tulwick Park, Grove can help to facilitate the delivery of long supported infrastructure in the area, namely the reopening of Grove railway station. However it is important to note that DWS consider that this site is a sustainable location for new development whether or not the station is reopened during the Plan period to 2031.
- 1.9 On the day (22nd November 2017 of the representations being submitted to the Local Plan Part 2 Publication Version), the Autumn Budget was announced to Parliament. The Budget included reference to the Government having “agreed an ambitious Housing Deal with Oxfordshire to deliver 100,000 homes by 2031.” In addition, the Budget sets out the commitment to “The biggest rail programme since Victorian times.”
- 1.10 This Statement on Matter 1 should be read alongside other Statements submitted by Turley on behalf of DWS, namely in relation to Matters 1, 5 (addressing question 5.8), 6 and 8.
- 1.11 Each of the Statements submitted by Turley on behalf of DWS is made on the basis that:
- Evidence presented on behalf of DWS demonstrates that there will be a significant shortfall against housing requirements and expected supply throughout the District, including within the South East Vale Sub-Area and the Science Vale Ring Fence Area.
 - The VoWH has sought to reduce the requirement in the South East Vale Sub-Area to 12,150 (from 12,450). The VoWH has not explained the justification for this amendment. DWS maintains that the requirement in the South East Vale Sub-Area should be a minimum of 12,450 dwellings.
 - The LPP1 seeks to deliver 600 dwellings in the South East Vale Sub-Area outside of the Science Vale Ring Fence Area which are unlikely to be achieved due to the Policy constraints of that area and the presence of a made Neighbourhood Plan at the only settlement of note (Blewbury) which does not allocate sites for housing.
 - At Grove, the Grove Airfield and Monks Farm LPP1 allocations are likely to deliver significantly fewer dwellings than expected by the VoWH during the Plan

period. In particular, each of these sites is dependent upon the Grove Northern Link Road to deliver the quantum of development expected by the VoWH.

- There is significant uncertainty regarding the delivery of the North West Grove LPP2 proposed allocation during the Plan period.
- There is a compelling and demonstrable need to allocate additional or alternative sites to meet housing needs within the District and the South East Vale Sub-Area and Science Vale Ring Fence Area.
- Land at Tulwick Park, Grove has been discounted by the VoWH in favour of North West Grove, however the reasons for that conclusion cannot be substantiated. This is particularly the case given the uncertainty regarding the deliverability of North West Grove.
- Land at Tulwick Park, Grove can make a deliverable and sustainable contribution to housing supply. It is not constrained by the need to first deliver other adjacent or nearby sites or the delivery of off-site infrastructure. It is at a sustainable settlement and within an area where the VoWH seeks to focus growth given the emphasis on the economic significance of Science Vale. This applies whether or not land is safeguarded for reopening of Grove Railway Station east of the A338.
- Tulwick Park, Grove could be allocated in addition to North West Grove.
- The LPP2 identifies land safeguarded for the reopening of Grove Railway Station. The Statements for DWS set out concerns in relation to the delivery of a station within the proposed safeguarded areas. To restrict the opportunities for the location of this station at this time would result in a Plan which is inflexible and unable to respond to changing circumstances if evidence subsequently indicates that the station should be located elsewhere.

2. Response to Matter 3: Overall housing provision in the plan and its distribution between sub-areas

3.1 Is the proposal in the LPP2 to allocate 1,400 additional homes in the South East Vale Sub Area to support the economic growth of the Science Vale consistent with the strategy in the LPPP1, supported by proportionate evidence and deliverable?

- 2.1 DWS support the principle of allocating additional homes in the South East Vale Sub-Area in order to support the economic growth of the Science Vale. It broadly aligns with the strategy set out in Core Policy 15: *Spatial Strategy for South East Vale Sub-Area*, the overarching priority of which is to secure delivery of housing in conjunction with employment growth.
- 2.2 At first glance, the allocation of 1,400 additional homes will seemingly achieve LPP1's aspirations. However, under closer scrutiny a number of deficiencies are revealed and as a consequence, we have concerns over whether the strategy in LPP1 can be achieved.
- 2.3 In fact, as these Statements demonstrate, we have significant concerns regarding the deliverability of the housing requirement in the District and within the South East Vale Sub-Area. We consider that additional or alternative sites should be allocated in order to provide greater certainty that these requirements can be achieved. In particular, the Turley Statements on behalf of DWS set out concerns regarding deliverability of specific sites in the South East Vale Sub-Area, including at Grove. This is particularly important in the Science Vale Ring Fence area which is a regionally important focus for growth and the crux of the Council's spatial strategy.
- 2.4 These Statements demonstrate that there is significant concern regarding other allocations elsewhere in the District.

Core Policy 15: Local Plan Part 1

- 2.5 Core Policy 15 sets out the housing requirement for the South East Vale Sub-Area is 12,450 of which 11,850 are 'ring-fenced' for delivery within the Science Vale Sub-Area. This therefore translates to the requirement of 600 homes outside of the Science Vale Ring Fence Area.

Housing Supply Ring Fence

- 2.6 Ensuring the optimum housing requirement in the South East Sub-Area is crucial as we consider that a number of strategic allocations in LPP1 are not deliverable within the Plan period (see response to Question 3.3 and Matter 8). Most notably, DWS refers to Grove Airfield which is located within the Science Vale Ring Fence Area. This site is allocated for development (having been a saved Local Plan allocation) for the delivery of 2,500 dwellings. It is evident that the LPP1 (and LPP2) envisage that the site will be delivered, in its entirety, during the Plan period to 2031.

- 2.7 The Grove Airfield site is subject to a permission (P12/V0299/O) granted in July 2017 for the residential development of about 2,500 dwellings with associated services and facilities including secondary school, primary schools, local centre (including uses falling within use classes A1, A2, A3, A4, A5, B1, C2, D1 and D2).
- 2.8 Turley's previous representations on the LPP2 on behalf of DWS noted that this development is, in part, contingent upon the delivery of the GNLR. Part of the Grove Airfield application site includes land within the North West Grove site (proposed for allocation in the LPP2) which is intended to form part of the GNLR and connect with Denchworth Road. DWS understand that this part of the application site is to provide the 'northern spur road'.
- 2.9 Following recommendations from the Inspector's Report on the Local Plan 2011, the Grove Airfield allocation policy and supporting text was altered which requires the GNLR from the site to the A338 to be completed before any more than 1,500 dwellings have been built at the Airfield.
- 2.10 Evidently at the time of the Local Plan 2011 being adopted, the Monks Farm site had not been allocated. However, the Grove Airfield scheme requires the GNLR from the Airfield site to the A338, passing through what is now the Monks Farm allocation. As this statement explains, whilst the Airfield application makes provision for a road to Denchworth Road, the Monks Farm site does not and the crossing of the Byway Open to All Traffic (BOAT) within Monks Farm is not guaranteed. DWS, therefore, consider that at this point, there must be significant doubt as to whether the GNLR can be delivered from the Grove Airfield site to the A338 and therefore whether more than 1,500 dwellings can be occupied at the Airfield.
- 2.11 There are also a number of other factors which call into question the deliverability of this site, namely conditions and restrictions imposed through the Section 106 Agreement.
- 2.12 Furthermore, the outline application was promoted on behalf of two housebuilders: Taylor Wimpey and Persimmon. DWS understands that Taylor Wimpey are no longer involved and as a result, this will have significant implications on the rate at which the site will be delivered.
- 2.13 Therefore, we do not consider that 9,055 dwellings will be provided through strategic allocations before 2031.
- 2.14 As the Turley Statement to Matter 8 on behalf of DWS demonstrates, the deliverable supply from Grove Airfield, Monks Farm, North West Grove and other sites in the area during the Plan period should be significantly reduced.

Outside the Housing Supply Ring Fence

- 2.15 We have discussed already deliverability concerns within the housing Science Vale Ring Fence Area, however, we also consider that it is necessary to have regard to the remainder of the South East Vale Sub-Area (outside the Science Vale Ring Fence Area).
- 2.16 For ease of reference, Figure 5.4 of the LPP1 is shown below and identifies the extent of the South-East Vale Sub-Area (in blue), the defined settlements, key infrastructure and the Area of Outstanding Natural Beauty.

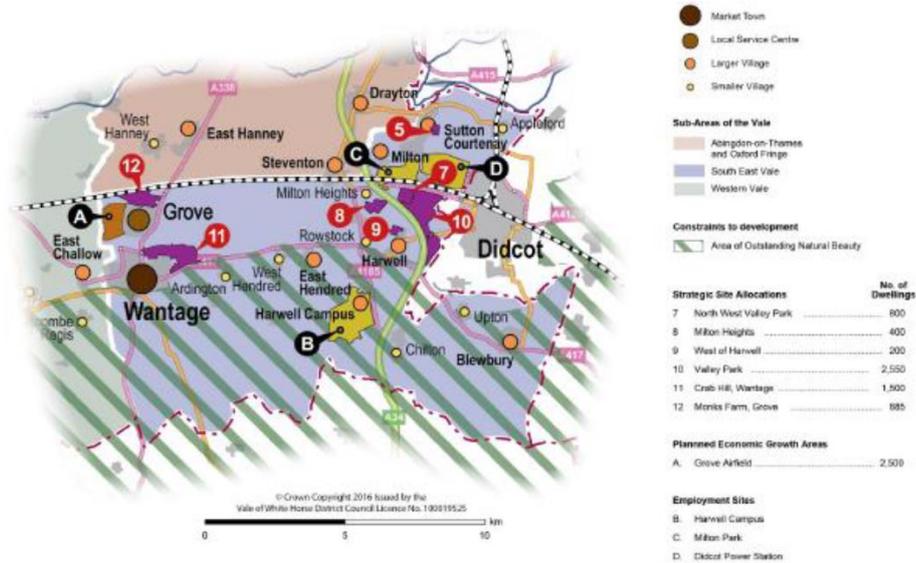


Figure 5.4 of the Vale of White Horse Local Plan Part 1, Vale of White Horse District Council

- 2.17 The South East Vale Sub-Area is generally consistent with the Science Vale Sub-Area, with the exception of an area to the south of Didcot. The area outside of the Science Vale Ring Fence Area is entirely within the AONB and only contains one settlement of any note at Blewbury. We consider that it is unfeasible that the area within the South East Vale outside of the Science Vale Ring Fence Area could deliver 600 dwellings in the plan period.
- 2.18 DWS understand that the ‘made’ Blewbury Neighbourhood Plan (2016-2031) does not allocate sites for development, with the Examiner’s Report stating:
- “No new housing is allocated in the emerging plan for Blewbury and the emerging policy is that development will be limited to providing for local needs and supporting local services and facilities.”*
- 2.19 As such, we consider that the Council should revise its strategy in LPP1 in order to redirect these 600 dwellings to within the Science Vale Ring Fence Area. This approach allows a context whereby these dwellings can be delivered, can be provided at more sustainable locations than Blewbury and can be located within the Science Vale Ring Fence Area which is a focus for significant investment and job growth.

Core Policy 15a: Local Plan Part 2

The Housing Requirement in the South East Vale Sub-Area

2.20 Core Policy 15 of LPP1 established a housing requirement of 12,450 dwellings within the South East Vale-Sub Area. In contrast Core Policy 15a of the LPP2 requires 12,150 dwellings in this area. The Council provides a footnote explaining the reason for the reduction in 300 dwellings:

“The Sub-Area housing requirement is updated in-line with changes to the Abingdon-on-Thames and Oxford Fringe Sub-Area to reflect the residual necessary to meet the agreed quantum of unmet housing need for Oxford to be addressed within the Vale.”

2.21 However, we consider that this explanation is unclear and that the Council has not provided sufficient justification for this alteration and reduction. Furthermore, we consider that this reallocation is counterintuitive given the importance of delivering housing to support the Science Vale.

2.22 We consider that Core Policy 15a should be revised to require a minimum of 12,450 dwellings.

Allocations in Core Policy 15a

2.23 The issues above are compounded by the additional allocations in Core Policy 15a of LPP2. It is considered by DWS that the former is not deliverable and the latter represents a unique opportunity which should, therefore, be considered as an addition to the housing requirement given that it serves a very specific need arising directly from the needs of Harwell Campus.

2.24 DWS consider that the delivery of the North West Grove site within the Plan period is highly questionable.

2.25 Topic Paper 2: Site Selection (October 2017) (TOP.02) itself acknowledges at paragraph 3.39 that:

“The site is not envisaged to deliver until later in the plan period”.

2.26 DWS considers that this is because delivery is likely to be associated with the timing and requirement of the Grove Airfield northern spur road. The delivery of the northern spur road within the plan period is highly questionable, as such calling into question the delivery of North West Grove.

2.27 The LPP2 proposes development at Harwell due to the very specific needs of the Campus. Accordingly, DWS considers that any housing at this location should be seen as being to provide for the needs of the Campus and not the wider needs arising within the Vale of White Horse District or in order to provide for the unmet housing needs of the wider area, including those of Oxford City.

Summary

2.28 In summary, DWS considers the following are essential to ensure the strategy set out in Core Policy 15 or LPP1 is achieved:

- The re-distribution of the housing requirement within the South East Vale Sub-Area as we do not consider that the area of the South East Vale Sub-Area outside the Science Vale Ring Fence Area can deliver 600 dwellings in the Plan period; and
- The reincorporation of the redistributed dwellings to the housing requirement for the South East Vale Sub-Area (reverting from 12,150 to 12,450 dwellings).

2.29 DWS considers two options should be considered to support the above which respond to concerns raised elsewhere in DWS's Statements with respect to the expected delays in housing delivery in the District:

- Option 1 - increase the housing requirement in the Housing Supply Ring-Fence in order to provide certainty over delivery;
- Option 2 - allocate additional/ alternate sites in order to provide greater certainty and flexibility over delivery.

2.30 The above options would ensure housing delivery supports economic prosperity, in turn achieving both the Council's strategy *and* the adoption of a Local Plan which is truly seeking to significantly boost the supply of housing for all residents in the Vale of White Horse.

2.31 DWS's site, Tulwick Park, Grove represents a site extending to 47.4 hectares within the housing ring-fence, capable of delivering the following within the plan period:

- Up to 600 homes (as part of a phased development);
- Typical housing mix consisting of detached, semi-detached and terraced family homes;
- The creation of land for employment uses;
- A community hub which could provide a building is use class D1 which could provide for a range of community uses, such as a medical facility as well as local retail opportunities to serve the residential and employment uses;
- A park and ride facility;
- A 1 form entry primary school (which could be extended to 2 forms of entry);
- Other non-residential uses include playing pitches, play areas and a productive landscape;
- The delivery of road, pedestrian and cycle access between the A38 and an area of land which would be safeguarded for the delivery of the reopened Grove railway stations;

- The potential to enhance cycle connections between the site and the existing formal infrastructure that currently stops at the A338/Main Street junction; and
- Safeguarded land for delivery of the reopened Grove railway station, helping to facilitate this long term aspiration through the delivery of new infrastructure and improved access.

2.32 Tulwick Park, Grove is not subject to the delivery of any other sites, nor is it dependent on off-site infrastructure e.g. the GLNR. As such, we consider that our site represents a site which is truly deliverable within the plan period, as well as capable of securing vital infrastructure to secure the sustainable development and future prosperity of the Science Vale.

2.33 The Site at Tulwick Park, Grove, therefore provides an opportunity for the Council to boost their delivery of housing, whilst aligning with their strategy through providing high quality housing, alongside employment growth and necessary infrastructure improvements.

3.2 Is the proposal in the LPP2 not to allocate additional sites in the Western Vale Sub Area consistent with the strategy in the LPP1 and supported by proportionate evidence?

2.34 We have no comments in relation to the above.

3.3 Taking the objectively assessed housing needs of the Vale and the unmet needs of Oxford together, is the overall housing provision in the LPP2, its distribution between sub areas and its various components, consistent with the strategy in the LPP1 supported by proportionate evidence and deliverable?

2.35 Turley have undertaken a Housing Land Supply Report (June 2018) which is included as an Appendix to our response on behalf of DWS to Matter 8. The Housing Land Supply Report undertakes a comprehensive assessment of the district-wide housing land supply position, taking into account the existing LPP1 commitments, other commitments, and the proposed LPP2 allocations. The Housing Land Supply Report blends the District's proposed sources of supply and considers supply across the various sub-areas.

2.36 Accordingly, our response to Matter 3 and Question 3.3 should be read in conjunction with our response to Matter 8 and the Turley Housing Land Supply Report.

2.37 The Report responds, in part, to an absence of proportionate evidence provided by the Council on the deliverability of the proposed strategy. The draft LPP2 includes a selection of sites which are relied on to deliver in the short term, and should be considered of a strategic scale. The Council's track record for accurately assessing the deliverability of such sites is poor. In the absence of any such information from the Council, the Turley Housing Land Supply Report sets out in detail a framework for setting realistic deliverability assumptions.

2.38 The Turley Housing Land Supply Report identifies the following shortfalls in the District's housing land supply:

Area	Council Delivery Assumption in Plan Period 2011 to 2031	Turley Delivery Assumption in Plan Period 2011 to 2031	Difference
Whole District	26,246	22,269	-3,977
Rest of District	11,392	10,327	-1,065
Science Vale Ring-Fence	13,754	10,842	-2,912
Abingdon and Oxford Sub-Area	4,445	3,380	-1,065
South East Vale Sub-Area	11,478	8,566	-2,912
Western Vale Sub-Area	1,923	1,923	0

- 2.39 The Housing Land Supply Report also finds that there are numerous other sites in the District which have not come forward as originally anticipated by the LPP1 Inspector, or could easily become delayed and fall behind the Council's optimistic assumptions. While delivery reductions have not been made to these sites in the Report, further stalling in the delivery of these sites will put the Council's long term supply at further risk.
- 2.40 We have identified that there is a significant shortfall in housing land supply arising in the South East Vale, and the Science Vale Ring Fence housing monitoring area. This shortfall equates to circa 4,000 dwellings.
- 2.41 Considering the true deliverability of the allocations and commitments relied on by the Council to deliver the distribution of development intended by the LPP1, we consider that in fact, there is a significant in-balance in the proposed distribution of development arising in the plan period. This will result in a fundamental inconsistency between the strategy which the LPP2 proposes, and what the LPP1 envisaged.
- 2.42 This sizeable shortfall undermines the strategy of the LPP1 by not allocating enough deliverable housing in the Abingdon and Oxford Sub-Area, the South East Vale Sub-Area and within the Science Vale Ring Fence Area.
- 2.43 We consider that in order to pass the tests of soundness the draft LPP2 should be amended to respond to the identified shortfalls through the allocation of alternative, demonstrably deliverable housing allocations. These housing allocations should be located in sub-areas responding to where we have identified shortfalls.

3.4 How would the overall provision of housing in the district be monitored to ensure delivery? Is the housing supply ring fence for the Science Vale area still relevant and necessary?

2.44 As mentioned previously under 3.1, DWS considers that the housing requirement distributed between the sub-areas across the Vale is unlikely to deliver the quantum of housing required for the following reasons:

- A number of the sites which have been allocated are undeliverable within the plan period; and
- The housing requirement set out for the area lying outside the housing supply ring fence is undeliverable due to constraints in the area

2.45 We consider that the Council has merely identified sites on a numeric basis, rather than based on evidence that these can be delivered within the Plan period.

2.46 Therefore, the Council's housing trajectory should be placed under close scrutiny to ensure housing is delivered as anticipated. This is pertinent owing to the quantum of unmet need from Oxford, as well as the strategic and economic importance of the Science Vale and the level of housing need overall. As such, delivery of housing in the District is essential in order to allow Oxfordshire to continue to thrive.

2.47 These concerns could be overcome through the allocation of additional/ alternate sites or by increasing the housing requirement (as mentioned previously). This would provide a buffer, allowing for those sites/ sub-areas which are unlikely to deliver the quantum of housing required.

2.48 DWS does consider the housing supply ring fence for the Science Vale both relevant and necessary. It is entirely appropriate to focus housing growth around a nationally and internationally significant employment site, whereby the largest number of new jobs will be created within the district. This, in turn, will promote sustainable transport options, allowing easy access between homes, employment and facilities.

2.49 In summary - in the Plan's current form - it would be crucial to monitor the Council's housing trajectory to ensure housing is delivered as expected. The importance of this hinges on the fact that the Vale of White Horse represents a strategically and economically significant district within the Thames Valley, whereby housing is critical to securing continued economic growth.

2.50 DWS considers that the Science Vale contributes significantly to the buoyancy of the District and the wider area and as such, the housing ring fence is still very much relevant and necessary.

3.5 Does the LPP2 provide for the housing needs of Gypsies, Travellers and Travelling Show People as envisaged by, or in a manner consistent with, Policy CP27 of the LPP1?

2.51 We have no comments in relation to the above.

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