



Oxford – Development and Planning

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Vale of White Horse Local Plan 2031: Part 2

Statement for Matter 4.1: Housing allocations listed in Policy 8a

Prepared on behalf of:

Catesby Estates Plc

Land south of Spring Hill, Southmoor

Introduction

- 1.1 This hearing statement has been prepared by Strutt & Parker on behalf of Catesby Estates Plc, who have residential development interests in land south of Spring Hill in Southmoor.
- 1.2 The site is located at the western edge of Southmoor and comprises low grade agricultural land. A Vision Statement was prepared for this site as part of the Local Plan Part 2 Preferred Options consultation in May 2017 and provides further background and justification for residential development in this location.
- 1.3 A representation to the Local Plan Part 2 Publication Version was subsequently submitted by Strutt & Parker on behalf of the landowner, Mr James Blanchard of Blanchard Enterprises, in November 2017. This representation was given the Person ID 1096329 and Agent ID 1096331 by the Council and was summarised in Appendix 3 of the Regulation 22 Consultation Statement – Summary of Representations.
- 1.4 Catesby Estates Plc have been chosen as the land promoter to work alongside the landowner in promoting the land south of Spring Hill, Southmoor as a suitable residential development site. This statement has therefore been prepared on behalf of Catesby Estates Plc, rather than Blanchard Enterprises.
- 1.5 This current statement responds to the Inspector's Matter 4.1: Abingdon and Oxford Fringe Sub-Area and the housing allocations listed in Policy 8a, due to be discussed at the hearing sessions on Tuesday 24th and Wednesday 25th July 2018. More specifically, this statement is predominantly concerned with the Kingston Bagpuize with Southmoor (in Fyfield and Tubney parish) site.

Matter 4.1 (c) Other than Dalton Barracks (Matter 5), are the housing allocations listed in Policy 8a the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts? Are the estimates of site capacity justified? Are the expected timescales for development realistic? Are the site development template requirements – both general and site specific – justified, consistent with national policy and would they be effective?

- 1.6 As set out above, this statement relates specifically to the site identified to the east of Kingston Bagpuize with Southmoor in Policy 8a. As a result, no comments will be made to the sites in East Hanney and South East of Marcham.

- 1.7 The site east of Kingston Bagpuize has been allocated for around 600 dwellings in Policy 8a. While this draft allocation may deliver some new infrastructure for the settlement, it will be reliant on the A415 being re-routed to the eastern edge of the development to effectively create a bypass around the settlement. It is apparent that the cost and construction period of this re-routed road will be significant, which could potentially delay or jeopardise the delivery of the new housing and associated infrastructure.
- 1.8 As a result of the above, the projected delivery of 200 dwellings in the next 5 years and the remaining 400 dwellings in the 6-15 year window could be overly optimistic. The estimated cost of the link road within this draft allocation has not been specified within the Infrastructure Delivery Plan produced by Arup on behalf of the Council, presumably as the full cost is expected to be met by the land promoter or future developer(s) of the site. Nevertheless, it is safe to assume that the cost will be in the millions of pounds. Should any unexpected technical or environmental constraints, for example, additional biodiversity mitigation costs, be discovered further down the line during the promotion or development of this site, then the viability of providing the new link road could become a significant factor in whether the site is fully developed or, at the very least, delivers the number of homes currently anticipated, particularly affordable homes.
- 1.9 Any slippage or delay in the delivery of the additional allocations identified in the Local Plan Part 2, most notably the large sites at Kingston Bagpuize and Dalton Barracks, will have a considerable effect on the Council's housing trajectory, which in turn will jeopardise the Council's housing land supply and present the opportunity for speculative developments to be brought forward, contrary to the Council's spatial strategy. Moreover, any delays in the delivery of these additional allocations will harm Oxford City Council as its unmet housing need will persist.
- 1.10 The Sustainability Appraisal (SA, September 2017) for the Local Plan Part 2 highlights the biodiversity constraints associated with the land east of Kingston Bagpuize stating that "*The eastern site is constrained, to some extent, by Appleton Lower Common SSSI and Frilford Heath, Ponds and Fens SSSI, which are within c.2km; and the adjacent Millennium Green is associated with a population of Great Crested Newts*". These constraints could also impact the delivery of new homes in this location. The site development template for this site makes it clear that necessary studies will need to be undertaken to investigate the possible impact on protected species, notably the

Great Crested Newts in the adjacent Millennium Green. It is considered that this site should not be allocated until such studies have been completed and it has been demonstrated that adequate mitigation measures can be achieved to truly counter any harmful impacts. Our client's land does not have the same constraints with regard to Great Crested Newts, which makes it more suitable and justified as a potential allocation from an environmental point of view.

- 1.11 In our view, the Council is overly reliant on the large scale allocations in the Abingdon-on-Thames and Oxford Fringe Sub-Area and has not given enough consideration to the implications of any slippage in the delivery of these sites, notably the site east of Kingston Bagpuize with Southmoor. It is therefore submitted that the Local Plan Part 2 is unsound in its current form as robust and credible evidence has not been presented to confirm that this additional allocation will deliver the projected level of housing need during the plan period. In other words, the emerging Plan may not be deliverable. Furthermore, it is considered that the emerging Plan does not incorporate a sufficient degree of flexibility to compensate or mitigate against any changing circumstances across the district and, specifically, delays in the delivery of infrastructure and/or the new housing on the current allocations.
- 1.12 As set out in our previous Publication Version representation, our client's land to the south of Spring Hill is a more suitable allocation.
- 1.13 The Housing and Economic Land Availability Assessment (HELAA) that has been prepared as part of the evidence base for the Local Plan Part 2 identifies our client's site off Spring Hill as 'KBAG11'. The HELAA confirms that the site is suitable in principle for development and is not affected by any fundamental constraints, such as a risk of flooding or special landscape designations. It is also apparent that the site is a significant distance from any heritage constraints, including the Kingston Bagpuize Conservation Area at the eastern end of the settlement and near to the draft allocation for 600 homes. The HELAA also acknowledges that the site south of Spring Hill is available and that it could deliver around 200 dwellings in the next five years and a further 200 in 6-15 years. We support this assessment.
- 1.14 The Sustainability Appraisal comments that our client's land at the western end of Southmoor would be more distant from the village centre than the draft eastern allocation, although we disagree and consider that the land south of Spring Hill is actually well-located in relation to the settlement's existing services and facilities and

the strategic highway network. While the development of land south of Spring Hill would not lead to the delivery of a link road to the east of Kingston Bagpuize, it could be argued that this link road would be unnecessary if the current draft allocation for 600 homes was omitted or replaced. The existing commitments elsewhere in the settlement are being delivered or have already been completed without the need for a new link road and, therefore, it is assumed that the current and projected traffic levels along the A415 are acceptable should the 600 home allocation not be taken forward.

- 1.15 The delivery of new homes on land south of Spring Hill, and potentially on land north of Spring Hill as well, would not require a large scale link road and therefore would not be reliant on the same level of infrastructure. These parcels of land on the western side of Southmoor could therefore be delivered more rapidly.
- 1.16 If the examining Inspector was minded to allocate land west of Southmoor rather than the current allocation to the east of Kingston Bagpuize, then we are of the opinion that a new primary school could form part of the proposals as the scale of development would be sufficient to support such infrastructure. This would therefore overcome one of the other criticisms of the site raised in the Sustainability Appraisal.
- 1.17 On the basis of the above, it is submitted that our client's land to the south of Spring Hill (potentially alongside the adjacent land to the north) is a more suitable location for the delivery of new housing in this settlement than the current draft allocation east of Kingston Bagpuize. Core Policies 4a and 8a could be modified to incorporate this suggested alternative allocation, particularly as the Local Plan Part 2 evidence base exists to support the allocation of our client's land without further consultation being required.
- 1.18 Alternatively, if the current draft allocation of 600 homes to the east of Kingston Bagpuize remains part of the emerging Local Plan Part 2, then we are of the opinion that reserve sites could be identified and incorporated into Core Policies 4a and 8a to act as a contingency should there be any slippage in the delivery of the identified allocations during the plan period, particularly at the larger sites in this Sub-Area. At present, the Council has given little weight to the adverse effects that any delay in housing delivery would have on their trajectory and overall spatial strategy and, therefore, it is considered that the identification of reserve sites could be a worthwhile approach. Our client's land south of Spring Hill in Southmoor would be a highly suitable and deliverable site should reserve sites be deemed appropriate.