

**VoWH LPP2 EIP - Statement for Matter 5 for
David Wilson Homes (Southern)
Tulwick Park, Grove**

June 2018

Turley

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David Murray-Cox
david.murray-cox@turley.co.uk

Client

David Wilson Homes

Our reference

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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. This
- 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, 3, 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 5: Dalton Barracks

5.8: Is it realistic for 1,200 dwellings to be delivered on the site during the plan period? What are the arrangements for the relocation of the existing military personnel on the site and are they realistic? How would the development be phased, and how would this relate to the continuing operation of the barracks?

- 2.1 Turley have undertaken a Housing Land Supply Report (June 2018) which is included as an Appendix to our response on behalf of DWH to Matter 8. The Report undertakes a comprehensive assessment of the district-wide housing land supply position.
- 2.2 Within this report, we set out detailed assumptions in relation to the deliverability of Dalton Barracks. We consider principally the first part of Question 5.8 *“Is it realistic for 1,200 dwellings to be delivered on the site during the plan period?”*
- 2.3 The emerging LPP2 seeks to identify land at Dalton Barracks for the delivery of 1,200 dwellings. The Housing Trajectory published alongside the LPP2 Publication Version indicates that the Dalton Barracks site is expected to deliver housing from 2023/2024 onwards. For the reasons explained below, we consider this to be extremely optimistic, and unrealistic.
- 2.4 There is some uncertainty about the date of ‘release’ of this site, how much land will be ‘released’, and what the ‘release’ of the land will entail.
- 2.5 We understand that a report published by the Ministry of Defence (MOD) and the Defence Infrastructure Organisation (DIO) in November 2016 entitled ‘Better defence estate strategy’ highlighted that the Dalton Barracks site would be released with an ‘estimated date of disposal of 2029’. An extract of the MOD/DIO report is contained at **Appendix 14** of the Turley Housing Supply Report.
- 2.6 If the ‘release’ of the site entails disposal from the MOD portfolio, we consider that only after this date will a developer be appointed to be able to prepare and submit a planning application.
- 2.7 The MOD’s responded to a Freedom of Information Request (**Appendix 15 of the Turley Housing Supply Report**) made by DWH in October 2017 states that Dalton Barracks was announced as a disposal opportunity for 2029 in November 2016 as part of the estate optimisation strategy “A Better Defence Estate”.
- 2.8 The same response states that:

“The disposal of Dalton Barracks is expected to follow our normal disposal process in accordance with Treasury Guidelines (Managing Public Money), including the completion of due diligence (e.g. site investigations, planning assessment, Crichel Down (Former Owner) investigations and associated site closure activities.”
- 2.9 The progress of sites on the MOD Disposal Programme is reported quarterly to the House of Commons. The report to the House of Commons of 6th October 2017

(Appendix 16 of the Turley Housing Supply Report) does not feature Dalton Barracks, but will do 'in due course' according to the FOI response.

2.10 Dalton Barracks did not appear on the MOD's Disposal database: House of Commons report in May 2018, indicating that a decision has not been taken to proceed to formal assessment work to determine the disposal strategy, funding requirements or relocation works.

2.11 The fact that the MOD's intention to dispose of Dalton Barracks in 2029 was announced in November 2016, but does not yet appear on the House of Commons progress report suggests that a decision has not been taken to proceed to further formal assessment work, including assessment of the disposal strategy.

2.12 More recently, and to the contrary a SoCG has been agreed between the Council and Carter Jonas on behalf of the DIO states that:

"The site is proposed for allocation in the Local Plan 2031 Part 2. Dialogue between the DIO and the Council has identified an opportunity for the development of the site to begin in 2024, ahead of the release of the main barracks by 2029. The Council is satisfied that 1,200 homes can be delivered in the plan period up to 2031.

It is recognised that the longer term potential for development is much greater than 1,200 dwellings, potentially in excess of 4,000 dwellings. Initial masterplanning indicates that the site could accommodate around 4,500 dwellings, subject to the provision of appropriate infrastructure. The site is expected to deliver a high quality new development that follows Garden Village principles, and will be guided by a comprehensive development framework...

The DIO will look to appoint a development partner prior to the military vacation of the site. This will be undertaken via a competitive procurement process enabling the DIO to appoint the most suitable developer/investor consortium to meet the site's specific development and regeneration objectives. This arrangement has been successfully deployed by the DIO on other strategic development opportunities around the UK, such as Whitehill & Bordon."

2.13 The draft Site Development Template states the development will follow a comprehensive development framework approach in accordance with Core Policy 8b: Dalton Barracks Comprehensive Development Framework and Supplementary Planning Document for Dalton Barracks.

2.14 We therefore do not consider that an outline planning application is likely to be progressed on this site until the following stages have been undertaken:

- Allocation and adoption in the LPP2;
- Competitive procurement process undertaken to appoint a development;
- Preparation, consultation and adoption of SPD;

- 2.15 Only following the above steps will the appointed developer be in a position to fund and submit a planning application.
- 2.16 The case for the delivery of this site rests on part of the site being released early for development. At this stage there is a conspicuous lack of information in relation to which part of the site might be released early to begin in 2024 and whether this part of the site will be included in the proposed SPD.
- 2.17 Based on the evidence previously set out in this report on lead in times, an outline application would have to have already been submitted, or submitted in the immediate short term in order to maximise any opportunity to deliver housing on the site in 2023/24 anticipated by the Council. This is clearly unachievable as there are numerous barriers to overcome before it is feasible to submit an approvable, viable or realistic planning application on the site.
- 2.18 Bringing forward ex-MOD sites involves a unique set of constraints and processes , and we consider that the lead in time to their development are likely to be even longer than bringing forward equivalent size schemes on greenfield sites such as urban extensions. Features of complication to bringing forward an ex-MOD can include:
- Navigation of the DIO/MOD/HCA disposals process;
 - Masterplanning and development of an SPD;
 - Phasing out of current occupants;
 - Often complex demolition works;
 - Site remediation.
- 2.19 The question for the deliverability of this site should be whether the site is capable of delivering housing in the 2023/24 monitoring year, but instead, whether the site is capable of delivering any housing in the plan period.
- 2.20 In the absence of any such information provided by the Council or agent, we have set out the following indicative programmes for the sites 'release' subject to its allocation in the LPP2. This timetable broadly reflects the lead in times evidence set out in the Turley Housing Supply Report, which set out that for sites of over 500 units, a lead in time of at least 6 years should be assumed. We consider this applies in this case, but due caution should be had to further barriers/stages to development such as the production of an SPD and navigation of a formal disposal process.

Year	Stage
2018/19	LPP2 progression
2019/20	Adoption of LPP2
2020/21	Work on SPD
2021/22	Adoption of SPD, appointment of development partner

2022/23	
2023/24	Release of site, outline application preparation, submission and determination
2024/25	
2025/26	Phase out occupants/detailed application submitted
2026/27	Detailed application determination
2027/28	Site survey work, pre commencement conditions
2028/29	Infrastructure works on site
2029/30	First housing completions
2030/31	Housing completions

- 2.21 Notwithstanding the above indicative programme, if the site is not ‘released’ until 2029, and an outline application on the site is progressed at that stage, then the site will not deliver any dwellings in the Plan period.
- 2.22 At this stage, we consider that the Council cannot have sufficient certainty that the Dalton Barracks site will be released in sufficient time to allow for the development to be delivered during the Plan period at the rates upon which they rely.
- 2.23 In summary:
- The site is currently occupied and unavailable for development – it requires release through a formal disposals procedure;
 - The site is reported to be released by the MOD for development in 2024, however this is not evidenced in any documentation beyond a SoCG signed by the Carter Jonas as planning consultants;
 - At this stage it is unclear what the ‘release date’ means in terms of implication to the project programme;
 - The site is more complex than bringing forward a greenfield site – it is brownfield, requires an SPD, phasing and remediation;
 - Should the site be released in 2024 and an outline application submitted immediately, the lead in time to dwelling completions on this site will result in first delivery in 2029 at the earliest;
- 2.24 The annual delivery rates and lead in time required to deliver 1,200 dwellings from this site in the plan period are extremely optimistic. Taking into account all of the above, we consider that if allocated, the proposed allocation at Dalton Barracks can be relied upon to deliver far fewer dwellings in the current Plan period. The following revised delivery assumptions have therefore been applied to Dalton Barracks:

17/	18/	19/	20/	21/	22/	23/	24/	25/	26/	27/	28/	29/	30/
18	19	20	21	22	23	24	25	26	27	28	29	30	31

Council	0	0	0	0	0	0	0	0	50	100	200	200	200	225	225
Turley	0	0	0	0	0	0	0	0	0	0	0	0	0	45	90

- 2.25 The above assumes that the site will be ‘released’ for development in 2024 and an outline planning application submitted on the site immediately, in accordance with an adopted SPD which has been produced in advance of this date.
- 2.26 The resultant reduction to the total delivery from Dalton Barracks in the remainder of the LPP2 plan period is as follows:

Council Delivery Assumption in Plan Period 2011 to 2031	Turley Delivery Assumption in Plan Period 2011 to 2031	Difference
1,200	135	-1,065

- 2.27 We consider that this is a best case scenario, have some concerns over the deliverability of any dwellings on this site in the plan period at all, and that the Council should consider closely the role this site is proposed to play in the proposed strategy for the LPP2.

Turley Office
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830

Turley