



GERALDEVE

Planning Policy Team
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

72 Welbeck Street London W1G 0AY
Tel. 020 7493 3338
www.geraldeve.com

21 November 2017

Our ref: AFG/RJLD/AGA/DBE/G6493

**Your ref: Vale of White Horse Local Plan 2031
Part 2: Publication Version**

Dear Sir or Madam,

**Vale of White Horse Local Plan 2031 Part 2
Publication Version Consultation Representations**

We write on behalf of our client, Merton College Oxford, in order to submit representations in respect of the Publication Version Consultation of the Vale of White Horse Local Plan 2031 Part 2 which considers Oxford's Unmet Housing Need.

Merton College has an interest in land in Oxford and is a substantial landowner in areas outside of the City. Their landholding within the District is considered appropriate for consideration for meeting Oxford's Unmet Housing Need.

If you have any queries, please do not hesitate to contact Robert Davies (0207 333 6207) or Doug Beasley (0207 333 6415) of this office in the first instance.

Yours faithfully

Gerald Eve LLP

rdavies@geraldeve.com
Direct tel. +44 (0)20 7333 6207
Mobile +44 (0)7944 584053

cc. John Gloag – Merton College



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing (where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Mr

Davies

Partner

Gerald Eve LLP

72 Welbeck Street

London

W1G 0AY

0207 333 6207

rdavies@geraldeve.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Our client's responses, submitted to the Council in May 2017 in response to the Vale of White Horse Local Plan 2031 Part 2: Preferred Options consultation, in respect of Site 15 'BOTL_A: South-West of Botley' ('the site') still stand.

The Policy Approach to Policy 4a is Unsound

It is considered that the Publication Version of the Local Plan: Part 2 is unsound in respect of NPPF paragraphs 158, 159, 178-182.

NPPF paragraph 158 states that: **“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”**

Not Positively Prepared:

The Publication Version of the Local Plan: Part 2 does not properly address the identified local development requirements, including that of neighbouring authorities where it is reasonable to do. According to the NPPF, in order to be thought of as 'positively prepared' the plan should seek 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.”

As currently drafted, the Local Plan would not deliver the unmet housing requirements for Oxford, defined as Oxford’s unmet housing need, in the most sustainable way. The methodology presented in the Publication Version of the Local Plan is unsound. Planning Practice Guidance provides advice on methodological approaches to assessing housing need. Need should be based on household projections applied to representative rates to the population projections published by the Office for National Statistics. Also, Paragraph 47 of the NPPF states that ‘to boost significantly the supply of housing’ LPAs should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

Based on the above, it is considered inappropriate to include ‘housing completions’ within the projected number of houses to be delivered. This serves to distort the actual existing deficit of housing in the area and misrepresent the contribution of the proposed allocated sites to meet housing needs. There is no clear indication as to where the proposed 2,200 dwellings required would be delivered. It is considered that the Local Plan: Part 2 needs to demonstrate the ability to deliver two separate groups of dwellings 1) those that would serve the Vale of White Horse and 2) those that would serve the unmet needs arising from Oxford.

The current proposed provision of housing to meet Oxford’s unmet need in the Publication Version of the Local Plan is opaque. We highlight Cherwell District Council’s ‘Partial Review of Cherwell Local Plan 2011-2031 - Oxford’s Unmet Housing Need’ Section 5, Table 4 as a good example of setting out how the identified need would be met over the Plan period. Cherwell District Council clearly outline that they are required to deliver 4,400 houses in the plan period and support that with clear evidence of sites with capacity to deliver those houses. It is not considered that the Vale of White Horse have the required level of evidence to demonstrate site capacity to deliver the required number of houses (2,200) to be delivered over the plan period, as agreed through the Oxford Growth Board.

It is not considered appropriate to meet Oxford’s unmet need in Abingdon as its distant from Oxford and could encourage unsustainable modes of transport if links between them were to increase and intensify.

Furthermore, our clients site (‘Site 15’ ‘Site West of Botley’) is considered to be perfectly suitable for the delivery of a significant number of dwellings to meet the

Vale's housing needs but also to contribute to the wider unmet need of Oxford City.

A key consideration in respect of Site 15 'Site West of Botley' is the benefits that the site will offer over the publication version sites set out in Policy 4a in terms of sustainability and transport given its close proximity to Oxford, where the unmet housing need arises. In comparison to Site 15 (Site West of Botley) the other sites presented in the Publication Version of the Plan are located up to 15 miles away from Oxford City Centre with materially longer journey times. The requirement to travel significantly greater distances to these sites would lead to higher overall environmental, economic and social costs associated with meeting Oxford's unmet housing need. The Transport Study, prepared by WSP Parsons Brinckerhoff, submitted with our previous representations to the Preferred Options consultation in May 2017, concluded that the allocation of the site for strategic development would not only contribute to the Vale's apportioned quantum of housing to meet Oxford City's unmet need by 2031, but would also achieve broader transport objectives with regard to encouragement of further uptake of sustainable travel modes, thereby connecting communities with employment, education and leisure opportunities within both the Vale of White Horse and the rest of Oxfordshire.

Furthermore, we consider the Council to be over-relying on the delivery of one single point of delivery in the form of the proposed development at Dalton Barracks to meet its outstanding housing need. The Dalton Barracks site would contribute 1,200 dwellings to meet the needs of Abingdon and the Vale (calculated at 2,200 dwellings), however it is not considered it would contribute to meeting the unmet housing need in Oxford City due to its distance from the City.

Unjustified

The NPPF states that the Plan should be "**the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.**" It is not considered that the Plan demonstrates the most appropriate strategy for delivering the development requirements for the area as it does not reflect the evidence base for the local area and the neighbouring local authorities. The LPA have not considered the most appropriate, sustainable sites to Oxford City.

It is considered that the site (Site 15 'South West of Botley') is suitable for housing development. Merton College undertook a significant and thorough assessment of the site as part of the representations made to the Local Plan preparation process in May 2017, which have not been given due consideration in the recently published Local Plan Part 2 'Publication Version' (October 2017). The LPA's assessment of the site in landscape terms has been based upon the whole area of the site (52ha) whereas in reality the development could be designed to be sensitive to landscape constraints/sensitivity on a different developable area to that assessed. As previously stated in earlier representations, should the reduced masterplan area of approximately 25ha be assessed, rather than all the criteria having a 'high' rating, the ratings are revised to 'low-medium'.

Our client also questions the reason for the extent of the site subject to testing for allocation being changed and reduced in size from the Preferred Options to the Publication version of the Local Plan: Part 2. There is no justification for this change within Topic Paper 2 (October 2017).

We therefore conclude that the document is unsound.

Ineffective

The NPPF states that the Plan should be deliverable over the course of the Plan period and based on “**effective joint working on cross-boundary strategic issues.**”

The Draft Local Plan does not meet this requirement because there is no evidence of genuine joint working on all matters, resulting in it not meeting Oxford’s unmet housing need. Therefore we conclude that the document is unsound.

We are concerned that the representations submitted to the council on 4 May 2017 promoting the site for residential allocation have not been properly or appropriately considered.

We consider that the site should be identified as a Preferred Option for housing development to meet Oxford’s unmet needs given it is a highly sustainable location for housing and in close proximity to Oxford. The Preferred Options are much further away from Oxford.

We consider that whilst housing for Oxford should ideally be located in Oxford. However, given that it cannot be delivered with Oxford City’s own boundaries, it should be located as close to where the need arises as possible. The current Preferred Options are not considered to meet this objective, being located a significant distance from the City Centre (up to 15 miles) and having a resultant journey time of up to 40 -50 minutes by public transport. Merton College’s land at Site 15, ‘South West of Botley’, is closer to the City than any of the preferred or additional site allocations in the Vale’s Local Plan Parts One and Two, and also offers equal or better accessibility by public transport compared to all other sites and would be further enhanced by the proposed Park and Ride facility. Many of the proposed preferred options are not suitable and sustainable locations to meet the needs of Oxford and it is not considered that the demand for housing within Oxford will be satisfied by supplying housing located this far from the City.

In order for the proposed sites to be found sound, options closer to Oxford should have been assessed and discounted appropriately. Where potential reasons for discounting sites in close proximity to Oxford have been identified, these factors should have been considered holistically and balanced against the positive impacts of locating housing in such locations. This should have been considered alongside the externalities and cost caused by not locating housing in locations close to Oxford and instead putting it in a location that is much further from the City, as appears to be the case with the options presented in the Publication Version.

Paragraph 17 of the NPPF states that “**allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework**”. Thus, LPA’s should ‘prefer’ land of lesser value. Part of the site has been safeguarded for Park and Ride development (Core Policy 12a part (i)), therefore it follows that the site has less environmental value than other designated areas of the Oxford Green Belt. By virtue of being selected for a Park and Ride and the associated development including lighting etc. that will take place.

The ‘Site Selection Topic Paper 2’ states that ‘the site is not proposed for allocation’. We consider that discounting the site for residential development on the grounds of

landscape issues is an unsound decision. As a result, Landscape Matters (LM), the consultancy who provided the Landscape Statement which supported the Merton College Oxford representations made in May 2017 (in response to the Preferred Options consultation), have reviewed the report.

It is acknowledged that the site is potentially sensitive, which is why the proposed extent of development at the site has been restricted in the plan included on page 9 of Topic Paper 2: Site Selection; boundary vegetation retained and enhanced and the proposed footprint of development aligned away from sensitive locations. Therefore, it is considered that the statement 'the site is extremely sensitive in landscape terms and makes a strong contribution to the purposes of the Oxford Green Belt' should be qualified to read 'is potentially sensitive'. Development at the site has the potential to improve the site's environmental interest in the longer term as there would be extensive tree, shrub and hedge planting associated with the housing which should result in the creation of an attractive 'woodland' setting that compliments the surrounding wooding backdrop and provides increased visual interest to the landscape in comparison to the existing.

We also consider the Local Plan to be unsound as the statement that 'no part of this site is suitable in landscape terms for residential development' is considered incorrect. The Landscape Matters document, previously submitted to the council in May 2017, demonstrated that some development should be acceptable. The only question should therefore be how much and this should be decided based on an accurate assessment of the actual masterplan.

The Council's position and conclusion that the site is not suitable for development as a result of landscape considerations is unsound and is further compounded by the Council's allocation under Policy 12a(i) of a part of the site as a Park and Ride development site. The landscape in this part of the site has therefore been considered as not valuable and not worthy of safeguarding from development.

The Local Plan does not comply with the 'Duty to Cooperate'

It is not considered that the plan demonstrates a sufficient level of cooperation with the neighbouring local authorities.

A key objective of the Local Plan 2031 Part 2 is to deliver at least 2,200 homes in the Vale in response to Oxford's unmet housing need. With regards to this overarching figure, we consider that, whilst agreed with the Oxfordshire Growth Board (OGB), this figure is unlikely to be sufficient, in light of the severity of the housing shortage within Oxford and particularly in light of the issues with South Oxfordshire. The VOWH should therefore seek to contribute further to responding to Oxford's unmet housing need, and do so as close to Oxford itself as possible.

At present, nowhere in this document is the defined housing contributing to Oxford's unmet housing need set out.

Conclusion

The Publication Version of the Local Plan: Part 2 is considered unsound. This is because the evidence demonstrated within the document regarding meeting the LPA's and Oxford City's unmet housing need is flawed in its use of housing completions to establish actual housing need and its overreliance on the potential for the Dalton Barracks site to deliver a significant proportion of required dwellings.

We consider that Site 15 'South West of Botley' represents an excellent opportunity to deliver a meaningful supply of housing in the right location for Oxford. As demonstrated through these submissions and the supporting consultant documentation previously submitted at the time of the Preferred Options consultation in May 2017, the potential public benefits that could be delivered by the development of this site outweigh the landscape constraints and would contribute to the quality of the landscape at the site in the longer term through the extensive tree, shrub and hedge planting associated with housing. The effect should be a different but more attractive and open setting. The site should therefore have been allocated for housing to help meet Oxford's unmet needs.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider that part of Merton College Oxford's site, Site 15 'South West of Botley' within the Site Selection topic paper, should be released from the Oxford Green Belt and allocated for housing, alongside the proposed Park and Ride, to meet Oxford's unmet housing needs. It is a sustainable location in close proximity to Oxford, and housing can be provided that is sensitive to, and works within, the acknowledged landscape constraints alongside the proposed Park and Ride.

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

x

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To enable the Planning Inspector to fully understand the key reasons why our request amendment to the Local Plan is required to make the plan 'sound', and to facilitate a thorough examination of the issues.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

21/11/2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**



Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<input type="text" value="Mr"/>
First Name	<input type="text"/>
Last Name	<input type="text" value="Gloag"/>
Job Title (where relevant)	<input type="text"/>
Organisation representing (where relevant)	<input type="text" value="Merton College Oxford"/>
Address Line 1	<input type="text" value="c/o Agent"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Postal Town	<input type="text"/>
Post Code	<input type="text"/>
Telephone Number	<input type="text"/>
Email Address	<input type="text"/>

2. Agent's Details (if applicable)

<input type="text" value="Mr"/>
<input type="text"/>
<input type="text" value="Davies"/>
<input type="text" value="Partner"/>
<input type="text" value="Gerald Eve LLP"/>
<input type="text" value="72 Welbeck Street"/>
<input type="text" value="London"/>
<input type="text"/>
<input type="text" value="W1G 0AY"/>
<input type="text" value="0207 333 6207"/>
<input type="text" value="rdavies@geraldeve.com"/>

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

8a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Our client's responses, submitted to the Council in May 2017 in response to the Vale of White Horse Local Plan 2031 Part 2: Preferred Options consultation, in respect of Site 15 'BOTL_A: South-West of Botley' ('the site') still stand.

The Policy Approach to Policy 8a is Unsound

It is considered that the Publication Version of the Local Plan: Part 2 is unsound in respect of NPPF paragraphs 158, 159, 178-182.

NPPF paragraph 158 states that: **“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”**

Not Positively Prepared:

The Publication Version of the Local Plan: Part 2 does not properly address the identified local development requirements, including that of neighbouring authorities where it is reasonable to do. According to the NPPF, in order to be thought of as 'positively prepared' the plan should seek 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.”

As currently drafted, the Local Plan would not deliver the unmet housing requirements for Oxford, defined as Oxford’s unmet housing need, in the most sustainable way. The methodology presented in the Publication Version of the Local Plan is unsound. Planning Practice Guidance provides advice on methodological approaches to assessing housing need. Also, Paragraph 47 of the NPPF states that ‘to boost significantly the supply of housing’ LPAs should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
- identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

Based on the above, it is considered inappropriate to include ‘housing completions’ within the projected number of houses to be delivered. This serves to distort the actual existing deficit of housing in the area and misrepresent the contribution of the proposed allocated sites to meet housing needs. There is no clear indication within Policy 8a as to where the Vale’s required contribution of 2,200 dwellings towards meeting Oxford’s unmet housing need would be delivered. Policy 8a: Part 2 Allocations (p. 33) demonstrates that the council can only deliver 2,020 dwellings over the plan period on the additional sites identified for allocation, falling 180 short of the required 2,200. The drafted policy wording states that 1,790 dwellings would be delivered on strategic allocations, however there is no evidence of these sites within the policy or the wider document. Those sites identified in Core Policy 4 of the adopted Local Plan: Part 1 should be reiterated in this document to ensure coherence and to clearly demonstrate that the council will be able to deliver the required number of dwellings to meet Oxford’s unmet housing need over the plan period.

Furthermore, we consider the Council to be over-relying on the delivery of one single point of delivery in the form of the proposed development at Dalton Barracks to meet its outstanding housing need. The Dalton Barracks site would contribute 1,200 dwellings to meet the needs of Abingdon and the Vale (calculated at 2,200 dwellings), however it is not considered it would contribute to meeting the unmet housing need in Oxford City due to its distance from the City.

It is considered that under Policy 8a the Local Plan: Part 2 needs to demonstrate the ability to deliver two separate groups of dwellings 1) those that would serve the Vale of White Horse and 2) those that would serve the unmet needs arising from Oxford.

The current proposed provision of housing to meet Oxford’s unmet need in the

Publication Version of the Local Plan is opaque. We highlight Cherwell District Council's 'Partial Review of Cherwell Local Plan 2011-2031 - Oxford's Unmet Housing Need' Section 5, Table 4 as a good example of setting out how the identified need would be met over the Plan period. Cherwell District Council clearly outline that they are required to deliver 4,400 houses in the plan period and support that with clear evidence of sites with capacity to deliver those houses. It is not considered that the Vale of White Horse have the required level of evidence to demonstrate site capacity to deliver the required number of houses (2,200) to be delivered over the plan period, as agreed through the Oxford Growth Board.

It is not considered appropriate to meet Oxford's unmet need in Abingdon as its distant from Oxford and could encourage unsustainable modes of transport if links between them were to increase and intensify.

Furthermore, our clients site ('Site 15' 'Site West of Botley') is considered to be perfectly suitable for the delivery of a significant number of dwellings to meet the Vale's housing needs but also to contribute to the wider unmet need of Oxford City.

A key consideration in respect of Site 15 'Site West of Botley' is the benefits that the site will offer over the publication version sites set out in Policy 4a in terms of sustainability and transport given its close proximity to Oxford, where the unmet housing need arises. In comparison to Site 15 (Site West of Botley) the other sites presented in the Publication Version of the Plan are located up to 15 miles away from Oxford City Centre with materially longer journey times. The requirement to travel significantly greater distances to these sites would lead to higher overall environmental, economic and social costs associated with meeting Oxford's unmet housing need. The Transport Study, prepared by WSP Parsons Brinckerhoff, submitted with our previous representations to the Preferred Options consultation in May 2017, concluded that the allocation of the site for strategic development would not only contribute to the Vale's apportioned quantum of housing to meet Oxford City's unmet need by 2031, but would also achieve broader transport objectives with regard to encouragement of further uptake of sustainable travel modes, thereby connecting communities with employment, education and leisure opportunities within both the Vale of White Horse and the rest of Oxfordshire.

Unjustified

The NPPF states that the Plan should be "**the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.**" It is not considered that the Plan demonstrates the most appropriate strategy for delivering the development requirements for the area as it does not reflect the evidence base for the local area and the neighbouring local authorities. The LPA have not considered the most appropriate, sustainable sites to Oxford City.

It is considered that the site (Site 15 'South West of Botley') is suitable for housing development. Merton College undertook a significant and thorough assessment of the site as part of the representations made to the Local Plan preparation process in May 2017, which have not been given due consideration in the recently published Local Plan Part 2 'Publication Version' (October 2017). The LPA's assessment of the site in landscape terms has been based upon the whole area of the site (52ha) whereas in reality the development could be designed to be sensitive to landscape constraints/sensitivity on a different developable area to that assessed. As previously stated in earlier representations, should the reduced masterplan area of

approximately 25ha be assessed, rather than all the criteria having a 'high' rating, the ratings are revised to –low-medium'.

Our client also questions the reason for the extent of the site subject to testing for allocation being changed and reduced in size from the Preferred Options to the Publication version of the Local Plan: Part 2. There is no justification for this change within Topic Paper 2 (October 2017).

We therefore conclude that the document is unsound.

Ineffective

The NPPF states that the Plan should be deliverable over the course of the Plan period and based on **“effective joint working on cross-boundary strategic issues.”**

The Draft Local Plan does not meet this requirement because there is no evidence of genuine joint working on all matters, resulting in it not meeting Oxford's unmet housing need. Therefore we conclude the document is unsound.

We are concerned that the representations submitted to the council on 4 May 2017 promoting the site for residential allocation have not been properly or appropriately considered.

We consider that the site should be identified as a Preferred Option for housing development to meet Oxford's unmet needs given it is a highly sustainable location for housing and in close proximity to Oxford. The Preferred Options are much further away from Oxford.

We consider that whilst housing for Oxford should ideally be located in Oxford. However, given that it cannot be delivered with Oxford City's own boundaries, it should be located as close to where the need arises as possible. The current Preferred Options are not considered to meet this objective, being located a significant distance from the City Centre (up to 15 miles) and having a resultant journey time of up to 40 -50 minutes by public transport. Merton College's land at Site 15 ('South West of Botley') is closer to the City than any of the preferred or additional site allocations in the Vale's Local Plan Parts One and Two, and also offers equal or better accessibility by public transport compared to all other sites and would be further enhanced by the proposed Park and Ride facility. Many of the proposed preferred options are not suitable and sustainable locations to meet the needs of Oxford and it is not considered that the demand for housing within Oxford will be satisfied by supplying housing located this far from the City.

In order for the proposed sites to be found sound, options closer to Oxford should have been assessed and discounted appropriately. Where potential reasons for discounting sites in close proximity to Oxford have been identified, these factors should have been considered holistically and balanced against the positives impacts of locating housing in such locations. This should have been considered alongside the externalities and cost caused by not locating housing in locations close to Oxford and instead putting it in a location that is much further from the City, as appears to be the case with the options presented in the Publication Version.

Paragraph 17 of the NPPF states that **“allocations of land for development**

should prefer land of lesser environmental value, where consistent with other policies in this Framework”. Thus, LPA’s should ‘prefer’ land of lesser value. Part of the site has been safeguarded for Park and Ride development (Core Policy 12a part (i)), therefore it follows that the site has less environmental value than other designated areas of the Oxford Green Belt. By virtue of being selected for a Park and Ride and the associated development including lighting etc. that will take place.

The ‘Site Selection Topic Paper 2’ states that ‘the site is not proposed for allocation’. We consider that discounting the site for residential development on the grounds of landscape issues is an unsound decision. As a result, Landscape Matters (LM), the consultancy who provided the Landscape Statement which supported the Merton College Oxford representations made in May 2017 (in response to the Preferred Options consultation), have reviewed the report.

It is acknowledged that the site is potentially sensitive, which is why the proposed extent of development at the site has been restricted in the plan included on page 9 of Topic Paper 2: Site Selection; boundary vegetation retained and enhanced and the proposed footprint of development aligned away from sensitive locations. Therefore, it is considered that the statement ‘the site is extremely sensitive in landscape terms and makes a strong contribution to the purposes of the Oxford Green Belt’ should be qualified to read ‘is potentially sensitive’. Development at the site has the potential to improve the site’s environmental interest in the longer term as there would be extensive tree, shrub and hedge planting associated with the housing which should result in the creation of an attractive ‘woodland’ setting that compliments the surrounding wooding backdrop and provides increased visual interest to the landscape in comparison to the existing.

We also consider the Local Plan to be unsound as the statement that ‘no part of this site is suitable in landscape terms for residential development’ is considered incorrect. The Landscape Matters document, previously submitted to the council in May 2017, demonstrated that some development should be acceptable. The only question should therefore be how much and this should be decided based on an accurate assessment of the actual masterplan.

The Council’s position and conclusion that the site is not suitable for development as a result of landscape considerations is unsound and is further compounded by the Council’s allocation under Policy 12a(i) of a part of the site as a Park and Ride development site. The landscape in this part of the site has therefore been considered as not valuable and not worthy of safeguarding from development.

The Local Plan does not comply with the ‘Duty to Cooperate’

It is not considered that the plan demonstrates a sufficient level of cooperation with the neighbouring local authorities.

A key objective of the Local Plan 2031 Part 2 is to deliver at least 2,200 homes in the Vale in response to Oxford’s unmet housing need. With regards to this overarching figure, we consider that, whilst agreed with the Oxfordshire Growth Board (OGB), this figure is unlikely to be sufficient, in light of the severity of the housing shortage within Oxford and particularly in light of the issues with South Oxfordshire. The VOWH should therefore seek to contribute further to responding to Oxford’s unmet housing need, and do so as close to Oxford itself as possible.

At present, nowhere in this document is the defined housing contributing to Oxford’s

unmet housing need set out.

Conclusion

The Publication Version of the Local Plan: Part 2 is considered unsound. This is because the evidence demonstrated within the document regarding meeting the LPA's and Oxford City's unmet housing need is flawed in its use of housing completions to establish actual housing need and its overreliance on the potential for the Dalton Barracks site to deliver a significant proportion of required dwellings.

We consider that Site 15 'South West of Botley' represents an excellent opportunity to deliver a meaningful supply of housing in the right location for Oxford. As demonstrated through these submissions and the supporting consultant documentation previously submitted at the time of the Preferred Options consultation in May 2017, the potential public benefits that could be delivered by the development of this site outweigh the landscape constraints and would contribute to the quality of the landscape at the site in the longer term through the extensive tree, shrub and hedge planting associated with housing. The effect should be a different but more attractive and open setting. The site should therefore have been allocated for housing to help meet Oxford's unmet needs.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We consider that part of Merton College Oxford's site, Site 15 'South West of Botley' within the Site Selection topic paper, should be released from the Oxford Green Belt and allocated for housing, alongside the proposed Park and Ride, to meet Oxford's unmet housing needs. It is a sustainable location in close proximity to Oxford, and housing can be provided that it is sensitive to, and works within, the acknowledged landscape constraints alongside the proposed Park and Ride.

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To enable the Planning Inspector to fully understand the key reasons why our request amendment to the Local Plan is required to make the plan 'sound', and to facilitate a thorough examination of the issues.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

21/11/2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

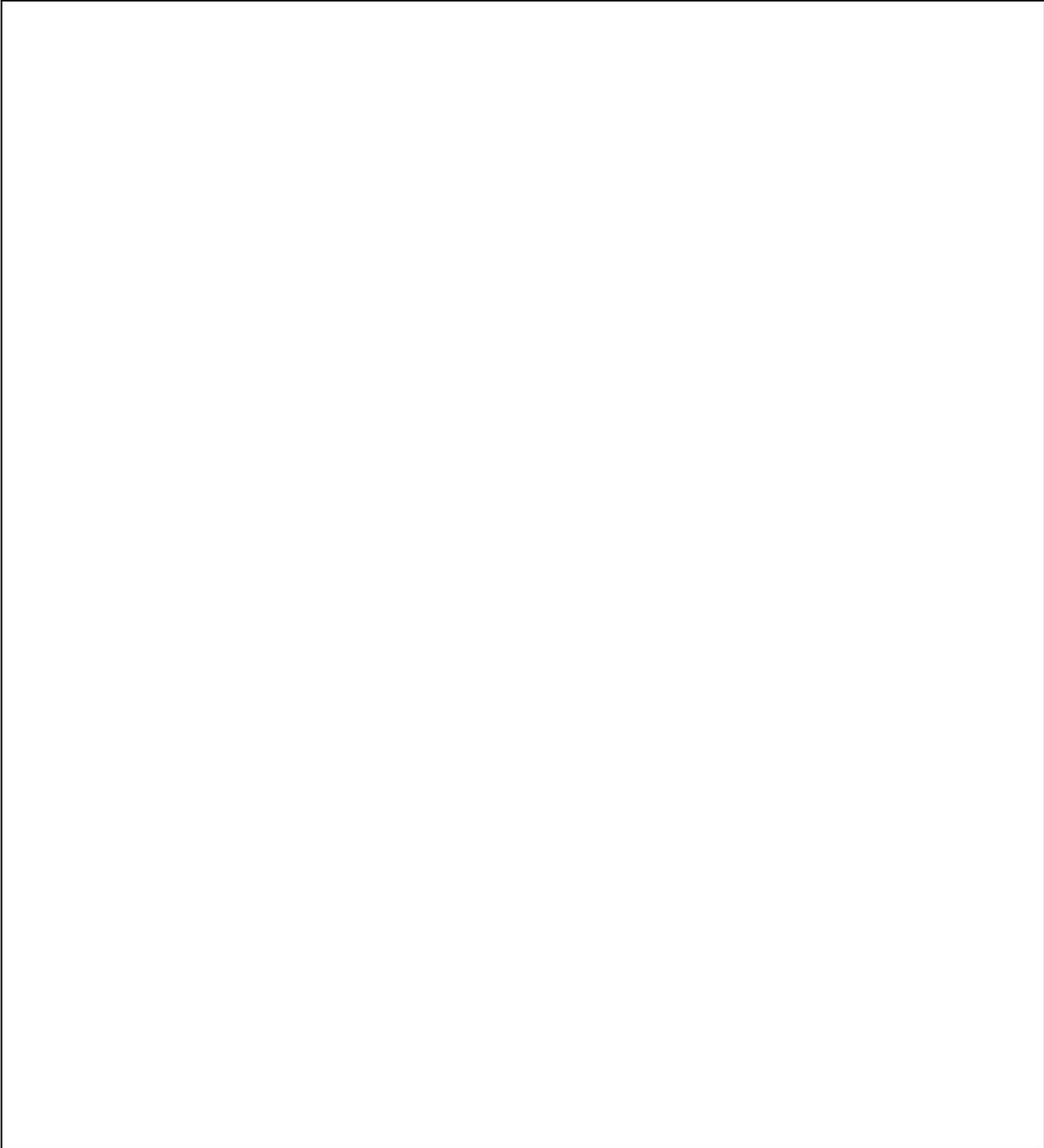
Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**



Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	Davies
Job Title (where relevant)	<input type="text"/>	Partner
Organisation representing (where relevant)	Merton College Oxford	Gerald Eve LLP
Address Line 1	c/o Agent	72 Welbeck Street
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	London
Post Code	<input type="text"/>	W1G 0AY
Telephone Number	<input type="text"/>	0207 333 6207
Email Address	<input type="text"/>	rdavies@geraldeve.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

12a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

x

No

4. (2) Sound

Yes

x

No

4. (3) Complies with the Duty to Cooperate

Yes

x

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

As per our comments made in May 2017 in response to the Preferred Options consultation, we continue to support the proposed safeguarding of land for Strategic Highway Improvements within the Abingdon-on Thames and Oxford Fringe Sub Area.

Our client, Merton College Oxford, has been in dialogue with the County regarding its Park and Ride proposals set out in the Oxford Park & Ride Future Strategy Development report dated 27 May 2016. This document identifies the same land that is proposed to be safeguarded by the Vale of White Horse consultation document (south of Cumnor Hill) as the best place to locate a Park & Ride along the A420. The Oxford Park & Ride Future Strategy Development Report sets out an indicative capacity for 1,200 vehicles for the land, and an indicative delivery time frame between 2026 and 2031.

Our client recognises the transport challenges faced by the County and District and is pleased to be able to assist it by helping to provide appropriate solutions and therefore welcomes the proposed allocation of part of its landholding for a Park and Ride accessing Oxford from the A420 corridor at Cumnor.

There would be clear benefits to the deliverability and operation of the Park & Ride by developing the land as part of a wider housing scheme to provide homes to meet the unmet needs of Oxford. In this way, occupiers commuting into Oxford could walk to the Park and Ride to catch the bus into Oxford. This is sustainable, and would provide quick total journey times into Oxford. It would also reduce vehicular journeys on the road network and would preserve the Park & Rides capacity for other users.

It is also recognised that the provision of a Park & Ride in this location may lead to the part or total closure of Seacourt Park & Ride which could in turn be repurposed to provide alternative and more appropriate uses.

Our client queries the meaning of the west-east facing red arrow, originating at the safeguarded site and labelled 'Rapid Transit 2 (indicative)' on Figure 2.4. The arrow appears to travel through a sensitive area of Green Belt land and our client seeks clarification as to what the proposed 'Rapid Transit 2' would be.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To enable the Planning Inspector to fully understand the position set out as landowner of one of the selected sites.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

21/11/2017

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

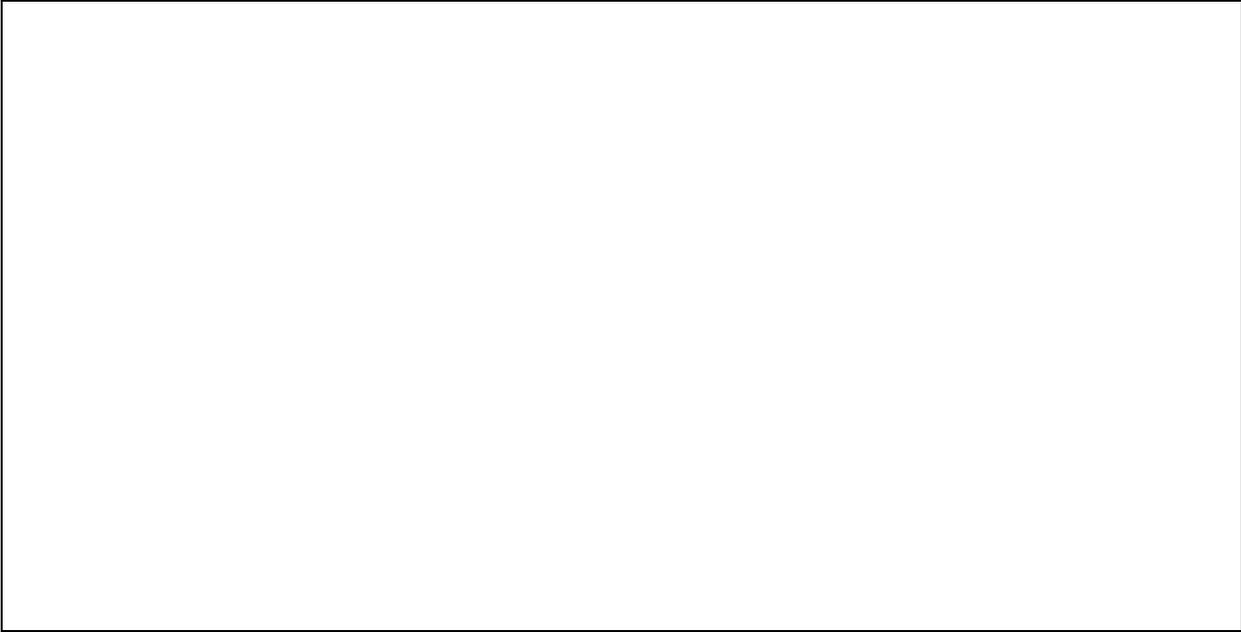
Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**



Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk