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**Vale of White Horse Local Plan 2031: Part 2
Statement for Matter 2: Unmet housing needs from Oxford**

**On behalf of David Wilson Homes Southern
Land at Pages Farm, Wootton**

Introduction

1. This hearing statement has been prepared by Strutt & Parker on behalf of David Wilson Homes (Southern) (DWS), who have residential development interests in land south of Wootton and to the east of Grove. Turley represents DWS interests at Grove, and their statement for Matter 8 is made on behalf of both sites.
2. Pages Farm is a 32 hectare site that lies to the south of the 'Larger Village' of Wootton, in the Abingdon and Oxford Fringe Sub Area. It was promoted to the Council in response to consultation on the draft Local Plan, and is capable of delivering up to 700 homes in a location accessible to Oxford.
3. This statement responds to the Inspector's Matter 2: Unmet housing needs from Oxford, due to be discussed at the hearing sessions on 3rd and 4th July 2018.

2.1 How has the 2,200 working assumption for unmet housing needs from Oxford within the Vale been arrived at and is it supported by proportionate evidence?

1. We consider that the process for arriving at the working assumption for the amount of Oxford's unmet need to be delivered in the Vale of White Horse is sound and based on proportionate evidence. This evidence is set out in the Growth Board Reports: Oxford Spatial Options Final Report 2016 (**HOU08**), within the examination library.

2.2 What are the arrangements for reviewing or updating this working assumption?

1. Neither Local Plan Part 1 Policy CP2, nor draft Core Policy CP4a nor CP8a in the submission draft Local Plan Part 2, provide for amendments to the working assumption on the quantum of Oxford's unmet need. There are two likely circumstances in which the amount of unmet need to be provided in Vale of White Horse could change. Firstly, the potential capacity of Oxford, which will result in the actual quantum of unmet need being confirmed on adoption of the Oxford City Local Plan. Secondly, South Oxfordshire are not currently proposing to meet all of the unmet need distributed to the District in its draft Local Plan. If the Council maintain this stance then this would result in circa. 1,200 homes of the Oxford's housing need being unmet.
2. However, Core Policy CP4a does state that the housing target is for '*at least 22,760 homes,*' which does provide some flexibility should the housing target need to increase.

2.3 Is the spatial strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by proportionate evidence?

1. We consider that the spatial strategy for meeting these unmet housing needs in the Abingdon and Oxford Sub Area is the most appropriate location given that this sub area is the most accessible to Oxford, where the housing need is arising.
2. This is consistent with the Abingdon on Thames and Oxford Fringe Sub Area Strategy set out in Local Plan 2031 Part 1 Strategic Sites and Policies (**ALP02**), which states at paragraph 5.4 that '*the Sub-Area is a highly sustainable location for development particularly due to its proximity to the city of Oxford and excellent public transport connectivity.*'

3. It is also consistent with the Oxford Spatial Options Final Report 2016 (**HOU08**) paragraph **3.2**, which states that locations were selected for testing/further assessment due to having a reasonable level of relationship to Oxford and in accordance with a methodology that had been agreed by all the authorities involved. All of the options considered through that process were within the Ab-Ox sub area, with the exception of two sites at Sutton Courtenay.
4. The sustainability appraisal in respect of East Hanney concluded that it is relatively remote from Oxford and the Science Vale, but is located on the A338. The County Council stated through the Preferred Options consultation that: 'East Hanney was originally on a long list of spatial options considered in the post SHMA work but was rejected through a check and challenge process as it was considered relatively remote from Oxford.'

2.4 Is the stated strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area followed through in the LPP2?

1. Policy CP8a allocates housing sites at larger villages, which is consistent with the Spatial Strategy set out in Figure 4.1 and the Settlement Hierarchy set out in Core Policy CP3 Settlement Hierarchy of Local Plan Part 1 (**ALP02**).
2. Site allocations at the higher order settlements of Abingdon (Market Town) and Botley (Local Service Centre) were considered by the Council in its site assessment process, but for the reasons set out in Table 3.3 of TOPIC PAPER 2 Site Selection (**TOP02.1**), the Council discounted these sites.
3. Irrespective of DWS's concerns with delivery at Dalton Barracks, the allocation of 1,200 homes at Shippon, a smaller village, appears at odds with the Spatial Strategy and settlement hierarchy. The Council appears to deal with this departure from the Strategy through a footnote to draft Policies CP4a and CP8a, stating that Dalton Barracks will provide services equivalent to a Larger Village.

2.5 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site – Dalton Barracks) and sites outside the Green Belt the most appropriate?

1. The exceptional circumstances required by paragraph 83 of the NPPF in order to carry out a review of Green Belt boundaries were established at Local Part 1. Paragraphs 2.66 to 2.75 of the draft Local Plan set out the background to the Council's approach to Green Belt review in Local Plan Part 1 and the comments made by the Inspector in his Report.
2. Paragraph 84 of the NPPF states that '*when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.*' DWS consider there is logic to the Council's approach and that they have had regard to the settlement hierarchy and accessibility to Oxford in allocating sites.
3. Local Plan Part 1 made allocations, including Green Belt releases, to the Market Town of Abingdon, Local Service Centre of Botley and Larger Villages of Radley and Kennington, all of which are accessible to Oxford. The Council sets out in Table 2.1 of the draft Local Plan a list of sites that are close to and accessible to Oxford, and

therefore suitable for meeting Oxford's unmet housing needs. This totals 2,860 homes, all of which are Green Belt releases.

4. Sites at Abingdon and Botley, the largest settlements in the sub-area, were considered in LPP2, but discounted by the Council for the reasons set out in Table 3.3 of TOPIC PAPER 2 Site Selection (**TOP02.1**).
5. Allocations are proposed in those Larger Villages outside the Green Belt, i.e. Kingston Bagpuize and Marcham. Smaller allocations are proposed at East Hanney to meet local needs in acknowledgement that it is relatively remote from Science Vale and Oxford, as evidenced on page 104 of the Sustainability Appraisal (Publication Version) (**CSD09**).
6. However, should the Inspector find that Dalton Barracks is not deliverable, we suggest that alternative sites are available in Larger Villages (in the Green Belt) in locations accessible to Oxford that can justifiably be released from the Green Belt to help meet housing need i.e. our client's site at Wootton (a larger village).

2.6 To what extent is the strategy for meeting these unmet needs deliverable in the necessary timescale?

1. Paragraph 2.16 of the draft Local Plan states that '*at least 2,200 dwellings are provided for on sites within this Sub-Area that are suitably close to and accessible to Oxford*'. This includes sites allocated in Local Plan Part 1 and a table of sites suitable for meeting Oxford's unmet needs is set out in Table 2.1 of the draft Local Plan, with the number of dwellings totalling 2,860.
2. Based on the evidence available to date, including Carter Jonas representations on the draft Plan on behalf of the DIO, and as set out in DWS representations to Policy 8a and response to Matter 5, we do not consider 1,200 dwellings at Dalton Barracks to be deliverable within the Plan Period. Based on the Housing Supply Report prepared by Turley on behalf of DWS, only 135 dwellings would be delivered during the Plan period in the best case scenario. Consequently, there will be a shortfall of 405 homes against the requirement to contribute 2,200 homes to Oxford's unmet needs and all the housing in the remaining allocations would be required for Oxford's needs, rather than meeting local needs.

2.7 To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?

1. The likelihood is that the amount of unmet need to be accommodated within the Vale of White Horse will change when Oxford City's Local Plan is adopted, or if the South Oxfordshire Local Plan does not accommodate all of the 4,950 homes distributed to it. The current draft of SODC's Local Plan accommodates 3,750 homes of unmet need, leaving 1,200 to be met elsewhere in the county.
2. Should the amount of housing need go up there are limited options in sustainable locations relative to Oxford where this need could be accommodated. The most accessible and sustainable settlements are within Green Belt. Paragraph 83 of the NPPF requires the review of Green Belt boundaries to have '*regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*' Furthermore, paragraph 85 of the NPPF states that local authorities should '*satisfy themselves that Green Belt boundaries will not need to be altered at*

the end of the development plan period, and where necessary, identify in their plans areas of 'safeguarded land' in order to meet longer-term development needs.'

3. It is clear that the Vale of White Horse draft Local Plan does not make any provision for this eventuality, except for stating its housing target as a minimum. In our view, this is not sufficient and a more explicit reference which allows for an early review of housing matters and/or provision of safeguarded sites should be considered.
4. DWS therefore suggest that flexibility could be provided through safeguarding Green Belt land that could be brought forward for development through a selective review of the Plan, if required.

2.9 How would the strategy for meeting Oxford's housing needs within the Vale be monitored to ensure its delivery? Is a housing supply ring fence for Abingdon and the Oxford Fringe sub area required?

1. If the Science Vale ring fence remains in place and the presumption in favour of sustainable development was triggered in the Rest of District supply area, due to slower than anticipated delivery at Dalton Barracks for example, Oxford's unmet need could end up being met through speculative applications in the Western Vale. This is unsustainable given that this sub-area has been discounted for meeting Oxford's unmet needs based on its distance from Oxford and travel times to it. For these reasons, DWS would support a housing supply ring fence for the Ab-Ox Sub-Area.
2. However, if a ring fence for Ox-Ab Sub-Area was implemented under a presumption in favour scenario, the shortfall could only be made up outside the Green Belt, at sustainable settlements, such as Kingston Bagpuize, Marcham, Drayton, East Hanney and Steventon.
3. Given the quantum of growth at Kingston Bagpuize there is a question over whether consenting further development at the settlement would increase delivery rates. Highways capacity issues at Marcham could limit further development at that settlement ahead of the bypass. Drayton has an adopted Neighbourhood Plan, Steventon is highly constrained by flood risk and the Council acknowledge that East Hanney is too distant from Oxford to contribute to its housing needs.
4. This would lead to development pressure at less sustainable settlements such as Longworth, West Hanney or Frilford.
5. An alternative solution would be to safeguard land or identify reserve sites for release in the eventuality delivery rates are slower than anticipated on the sites identified in Table 2.1, which would ensure that housing remains accessible to Oxford where the need is arising.