



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" value="RADLEY COLLEGE"/>	<input type="text" value="MR"/>
First Name	<input type="text"/>	<input type="text" value="CRAIG"/>
Last Name	<input type="text"/>	<input type="text" value="PETTIT"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="SENIOR PLANNER"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text" value="BARTON WILLMORE"/>
Address Line 1	<input type="text"/>	<input type="text" value="THE BLADE"/>
Address Line 2	<input type="text"/>	<input type="text" value="ABBAY SQUARE"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text" value="READING"/>
Post Code	<input type="text"/>	<input type="text" value="RG1 3BE"/>
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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) Compiles 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.

PLEASE SEE ENCLOSED REPRESENTATIONS

(Continue on page 4 /expand box if necessary)

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 SEE ENCLOSED REPRESENTATIONS

(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:

RADLEY COLLEGE SUPPORTS THE PROACTIVE APPROACH THAT HAS BEEN TAKEN BY THE COUNCIL IN SEEKING TO ACCOMMODATE THE AGREED PROPORTION OF OXFORD CITY'S UNMET NEEDS. HOWEVER, THE COLLEGE HAS MADE SOME SUGGESTIONS WHICH ARE INTENDED TO ASSIST THE COUNCIL IN ENSURING THE SOUNDNESS OF THE LPP2 DOCUMENT PRINCIPALLY BY ENSURING THAT THAT THE PLAN IS CONSISTENT WITH ITS EVIDENCE BASE AND ROBUST WITH REGARD TO DELIVERING THE HOUSING REQUIREMENT TO WHICH IT'S TASKED.

PLEASE SEE ENCLOSED REPRESENTATIONS FOR FURTHER INFORMATION.

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:

22/11/2017

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

Vale of White Horse District Council
Local Plan 2031 - Part 2
Detailed Policies and Additional Sites
Publication Version (October 2017)
Consultation

Representations on behalf of Radley College

November 2017

**Vale of White Horse District Council
Local Plan 2031 - Part 2
Detailed Policies and Additional Sites
Publication Version (October 2017) Consultation**

Representations on behalf of Radley College

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1.0 INTRODUCTION

1.1 Barton Willmore LLP (BW) is instructed by Radley College (our Client) to submit representations to the Vale of White Horse District Council's (the Council) current consultation exercise on the Local Plan 2031 Part 2 – Detailed Policies and Additional Sites document (Publication Version, October 2017); herein referred to as 'LPP2'. Radley College ('the College') has land interests within the district and is keen to work collaboratively with the District Council in taking the Plan forwards in a positive and proactive manner. The focus of these representations is the College's land interests within Abingdon and Radley Village, namely the sites known as Land off Radley Road, North-east Abingdon ('the Triangular Field'), Land at Gooseacre ('Gooseacre') and North Radley. Site plans of each are provided at Annexes 1-3 respectively. For completeness, Officers should note that Radley College and another landowner are also Freeholders of the site known 'North-West Radley'; a strategic allocation within the adopted Local Plan – Part 1; herein referred to as 'LPP1', and which is currently the subject of an outline planning application for up to 240 new residential units, due for determination by January 2018.

About the College

- 1.2 Radley College is an independent boarding school for 690 boys aged 13 – 18. It was founded in 1847 by the Reverend William Sewell.
- 1.3 The College campus covers a wide area to the west of Kennington Road and includes the academic, sporting and accommodation buildings, in addition to the chapel, and sports pitches, including the college golf course.
- 1.4 The College also has a large land holding in and around Radley and the outskirts of Abingdon which at present is either used for agricultural purposes on a tenanted basis, or is unused. The College has charitable status.
- 1.5 As outlined above, the College has notable land interests within the VoWH district. The College in particular, given its long standing presence within Radley, has engaged with the Council historically on various site promotion activities through previous Local Plan processes.

- 1.6 The College plays a very important role in the local community and is committed to progressing its obligations as a charity to maximise the value of its land assets, while simultaneously ensuring that any future development proposals are sympathetic to, and contribute positively towards the needs of, the local community.

Scope of Submission

- 1.7 Radley College is in broad support of the Plan and is keen to work with the Council to ensure that it is found sound under the tests of soundness enshrined within the National Planning Policy Framework (NPPF). Notwithstanding this, and in the spirit of helpfulness and the interests of sound planning, Radley College has a number of observations to make on the Plan and its linkages to the LPP1, namely the outlined 'spatial strategy'. The College also has some key suggestions in relation to the strategy for meeting the unmet need arising from Oxford City the scope for a more sustainable approach to this important issue. This is discussed further within Section 2 of these representations.

- 1.8 On behalf of Radley College Barton Willmore submitted representations to the previous Preferred Options consultation in May 2017. However, we note that the evidence base informing the LPP2 has consequently been updated and therefore these representations take account of both the overarching evidence and the more recent evidence published in October 2017.

- 1.9 Accordingly, within this submission we consider the following:

1.9.1 Within **Section 2** we provide an overview and critique of the Plan as a whole, with a particular focus on the issue of housing need and the requirement to deliver the apportioned unmet need arising from Oxford City. We also refer to the conclusions of the Green Belt review associated with the Local Plan – Part 1 and the most recent Green Belt Study conducted to inform the Local Plan – Part 2 to justify our position, with regard to specific land parcels. Consideration is given to the 'additional sites' allocated within the Local Plan Part 2 and how they contribute to the objectives of the Plan as a whole.

1.9.2 Within Section 3, we provide a brief overview of Radley College's future aspirations for Radley. We set out our proposals for the release of a portion of land at North Radley for community purposes and demonstrate how the site could come forward successfully to deliver a new village hall and a new primary school, in conjunction with small scale housing development on the Gooseacre site. As

part of this we provide conceptual details of the proposals, as informed by historic and ongoing engagement within the local community and other key stakeholders, namely Oxfordshire County Council (OCC), Radley Primary School and the Radley Neighbourhood Plan Group. Indeed we note that this option following our engagement with the aforementioned, received good support.

- 1.9.3 Within Section 3 we also make specific comment on the Triangular Field. We comment on the site assessment within the three staged Green Belt Review, conducted as part of the evidence base to inform Part 1 of the Local Plan, and we note the Council's response to stage three of this Review and query why the site remains within the Green Belt, given its clear credentials and noted absent contribution to the purposes of the Green Belt. Most imperatively, we note the most up to date review of the site within the recently published Green Belt Study of Local Plan Part 2 Sites.
- 1.9.4 Section 4 sets out our concluding remarks, summarises the College's position and desired outcomes and outlines potential next steps.

2.0 OVERVIEW AND CRITIQUE OF THE LOCAL PLAN - PART 2

Green Belt Review

- 2.1 A comprehensive Green Belt Review was included within the evidence base to the Local Plan Part 1 (LPP1). The Green Belt Review (February 2014), prepared by Kirkham Landscape Planning Ltd and Terra Firma Consultancy makes reference to a number of sites within the Freeholder's ownership, most pertinently areas **16** (containing Gooseacre), **17** (containing North-east Abingdon 'the Triangular Field') and '**North Radley**'.
- 2.2 The aforementioned review was undertaken in 3 phases and following the publication of the Phase 3 Report, the District Council published a response in relation to the conclusions made. Discussed in more detail at 2.1.10 onwards, our client notes that during the preparation for the LPP1, the three sites/areas above which our client promotes, were suggested for inclusion with the LPP2.
- 2.3 Most recently an independent Green Belt Study (October 2017) was instructed by the Vale of White Horse District Council to assess 18 sites located within the Oxford Green Belt, put forward by the Council. Of our client's land interests previously submitted for release, 3 were put forward for independent assessment and therefore this Green Belt Study will be used as the most up to date evidence for the sites in question, namely:
- Land at North-east Abingdon (Parcel 14 within the updated Green Belt Study)
 - Land North of Radley (Parcel 15 within the updated Green Belt Study)
 - Land at Gooseacre; and (Parcel 16 within the updated Green Belt Study) – *we note that this parcel contains two separate land parcels, of which our client only has control over the northern parcel. This is explored in more detail within the following section of these representations, where the Topic Paper is discussed.*
- 2.4 Officers will recall the LPP1 Inspector's comments within his report that, in relation to the parcels of land at Abingdon and Kennington (encompassing Radley) which were proposed for deletion from the Green Belt but not allocated for any purpose, he could 'see some sense' in their removal (paragraph 100 of the Inspector's Report refers) '...in the context of the removal of housing sites 1, 2, 3 and 4 and the desirability of producing logical and permanent Green Belt boundaries....there is interest in developing some of this land for

housing to assist in contributing to Oxford City's unmet housing needs, although this remains a matter for the 'Part 2' Plan.' All sites are solely within the College's control.

- 2.5 The principal purpose of the October 2017 Green Belt Study was to re-assess, as part of the LPP2 preparations, the extent to which promoted land within the Oxford Green Belt meets the five purposes of the Green Belt as stated in paragraph 80 of the NPPF; namely: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.6 In doing so, the October 2017 Green Belt Study helpfully summarises the conclusions of both the Oxford Green Belt Study (October 2015) and the Vale of White Horse District Green Belt Review (February 2014 – Phases 1 & 2 Report and November 2014 – Phase 3 Report), that came before it. The October 2017 Study then details its own conclusions in relation to the 18 sites put forward by the Vale of White Horse District Council.
- 2.7 Within section 4.4 'Summary of findings' of the October 2017 Green Belt Study, it is concluded that:

"Of the 18 sites assessed 11 could not be developed without harm to the Green Belt...A further 4 sites have some potential for development....Three sites have been assessed as having a low contribution to the aims and purposes of the Green Belt, have the potential for a robust new Green Belt boundary and have potential for development without significant harm to the wider Green Belt designation."

- 2.8 In relation to the above, our client's site to the north-east Abingdon - Site 14 (the Triangular Field), is one of the three sites which have been concluded to have potential for development in line with the summary quoted above. Indeed we note that with specific regard to Site 14 the summary concludes (page 42):

"The site has a limited contribution to the overall aims and purposes of the Green Belt and could be developed without significant harm to the wider Green Belt designation."

- 2.9 We note that the above conclusion also echoes the conclusions made within the previous Green Belt Review where in respect of land at north-east Abingdon (Area 17 with the previous review), the Council noted that:

“This parcel of land is not a logical part of the Green Belt as the built up area of the town to the north is entirely contained by Twelve Acre Drive. This site could be allocated in the Local Plan 2031 Part 2.”

- 2.10 Our client fully supports both the conclusions of the October 2017 Green Belt Study (Area 14) and the conclusions of the previous Phase 3 Green Belt Review (Area 17), including the Council’s commentary in relation to its relationship to the Green Belt.
- 2.11 Our client also supports the findings of the Council in relation to Area 16 and the indication that a proportion of Gooseacre is suitable for release. It is noted however that both sites remain unallocated and within the Green Belt, as discussed further in Section 3 of these representations.
- 2.12 With regard to North Radley, following the previous Phase 3 Green Belt Study Report, the Council’s response suggested that:

“...a small part of land to the north of Radley can be released from the Green Belt and developed without significant harm on the separation of settlements or the open character of the area...”

- 2.13 Our client maintains that the release of a proportion of this site could act as a valuable delivery mechanism for much needed new/regenerated infrastructure to serve a growing Radley village. The release of a proportion of the site would enable the logical re-siting of the existing Village Hall from Gooseacre, and assist with a solution to enabling Radley Primary School to address future growth and existing capacity issues, as discussed further within Section 3 of these representations.

Topic Paper 2 – Site selection and the Green Belt

- 2.14 Radley College are aware that in the context of current legislation, the preparation of the LPP2 represents the primary opportunity to release sites from the Green Belt as part of the Local Plan process in accordance with paragraph 83 of the NPPF which states:

“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

2.15 Accordingly we have undertaken a review of Topic Paper 2 as it sits within the LPP2 evidence base and provides a summary of how the Council has selected development sites for inclusion within the LPP2 (paragraph 1.1 of the document). We note also at paragraph 1.4 of the document it is stated that:

“The aim of this topic paper is to explain the process the Council has undertaken in identifying sites for inclusion within the Publication Version of the Plan.”

2.16 Section 3.0 of the Topic Paper 2 confirms the site selection methodology used and we note at Table 3.1 that it comprises 5 stages. Firstly with regard to stage 2 of the methodology we note that the Topic Paper states at paragraph 3.11:

“Site Size Threshold of 50 dwellings: the site selection methodology informing the Part 1 plan set a threshold of 200 or more dwellings for allocations. This filter identifies a lower threshold, and therefore sites of less than 200 dwellings were assessed. The Council recognises that smaller sites can contribute significantly to supporting housing delivery as they can deliver quickly and thus help to maintain a five-year supply of housing land.”

2.17 Appendix A to the Topic Paper 2 provides the staged assessment of the sites up to stage 3, with Appendix B to the Topic Paper providing the detailed assessment of the stage 4 sites. Stage 5 is therefore the list of preferred sites following the staged assessment. Within the Topic Paper 2 our client’s sites are referenced as follows:

- ABIG05 – North-east Abingdon
- RADL02, RADL03 and RADL04 – North Radley
- RADL11 – Gooseacre

North-east Abingdon

2.18 We note that site ABIG05 is discounted at stage 3 and the following justification is provided within Appendix A of the Topic Paper 2:

“The site could conceivably deliver fifty dwellings, however there are a number of constraints which impact the development potential of the site. It would be difficult to integrate the site into adjacent developments in Abingdon-on-Thames. Development of this site would erode the important gap between Abingdon-on-Thames and Radley and potentially impact upon the setting of Radley College and Park.”

- 2.19 Our client would firstly note that no further elaboration is provided in relation to the 'number of constraints' and nevertheless, as freeholder our client submits that the site is available to come forward immediately and no known constraints would prevent this. With regard to integration, the site sits immediately adjacent to existing development to the west. It is submitted that a masterplanning exercise could easily provide suitable connection points in order to enable integration between the two developments.
- 2.20 Most imperatively however, our client submits that the conclusions of Appendix A to the Topic Paper 2 in relation to the Green Belt are inconsistent with the conclusions of the October 2017 Green Belt Study, which as stated at paragraph 2.1.6 above, was undertaken to inform the preparation of the LPP2.
- 2.21 The Council will be aware that the Triangular Field formed the basis planning application P13/V1268/O which was refused in 2013, albeit the substantive reason for refusal at the time related solely to the Green Belt designation. In all other respects the site was deemed wholly sustainable and suitable for residential development, and indeed this site was put forward for release from the Green Belt as part of LPP1, on the basis that Council considered it to no longer fulfil a Green Belt function.
- 2.22 As noted in paragraph 2.1.9 above, there is clear justification and reasoning for the site's removal from the Green Belt, with the Council having also previously stated that its retention is not 'logical'. The conclusions within the LPP2 evidence base should be carried through to the preparation of the plan. This has not occurred in this instance and should be amended to allocate Site ABIG05 for housing development and to remove it from the Green Belt accordingly.

North Radley

- 2.23 Our client notes that in relation to sites RADL02, RADL03 and RADL04 the Topic Paper has merged these sites to form RADL_A and thus has carried the combined site through to stage 4.
- 2.24 Page 59 of Appendix B to the Topic Paper assesses RADL_A where it is noted that the land would need to be provided in order to enable the school to expand. Our client notes that land is already being provided to enable the school expansion, as part of the North West Radley planning application which is currently being considered. The Council should ensure that their assessment takes account of all development within the area and the most up to date information. Overall it is noted that the assessment concludes that the site is not suitable due to the sensitivities associated with the Green Belt and the impact

the development of this site would have. Our client wishes to state however that the removal of the entire site from the Green Belt is not pursued, as explained below.

- 2.25 Radley College note that Land 'North of Radley' (Parcel 15) was originally included within LPP1 as a strategic site, but later dismissed. The strategic site eventually allocated within the LPP1 was a portion of that originally proposed and is referred to as 'North West of Radley' within the LPP1. As stated at the beginning of these representations, our client owns and has now submitted an application for the development of this strategic site. The remaining area of land originally proposed for release therefore remains unallocated and within the Green Belt. In combination with their land at Gooseacre and as detailed within Section 3 of these representations, Radley College request that a proportion of this parcel is released from the Green Belt in order to facilitate the development of community facilities.

Land at Gooseacre

- 2.26 Finally our client notes that in relation to their site RADL11 (Land at Gooseacre), the Topic Paper has merged this site with RADL08 to the south and the combined site has been assessed via stage 4 on this basis. Our client would like to be clear that RADL08 is not under their control. Indeed, as explained in more detail within section 3 of these representations, our client promotes the release of their land at Gooseacre (for the avoidance of doubt parcel RADL11), to facilitate improved community facilities on their land at North Radley. Notwithstanding this we have considered the stage 4 assessment of the combined site provided in Appendix B to the Topic Paper.
- 2.27 It is noted that the collective site is discounted due to the openness of the eastern and southern boundaries of the combined site. This is not reflective of our client's site, RADL11, as the boundary of RADL11 abuts the current development boundary of Radley on 3 sides, and is open only on its southern flank, from where it would be read as part of the natural development edge of Radley. Consequently taken on its own the development of RAD1, which already contains built form, would not affect the openness of the Green Belt.
- 2.28 Notwithstanding the commentary above, to take RADL11 in isolation would mean, according to the Council's methodology, that the site is discounted due to an inability to provide the minimum threshold of 50 units at 25 dwellings per hectare (dph). In this regard we make the observation that it is not clear within the evidence documents how

the figure of 25 dph was derived. Furthermore Radley College notes the Council's comments within the Topic Paper 2 (page 13), where it is stated that:

"The Council considers that Neighbourhood Plans provide an appropriate approach for planning for sites less than 50 dwellings."

- 2.29 As we comment on further within these representations (see 2.3.19 onwards), the extent to which Neighbourhood Plans are actively preparing to deliver the level of housing anticipated is not yet clear. Moreover, as matters currently stand, Radley College would question the ability of a Neighbourhood Plan to release a site from the Green Belt, in order to allocate it within the Neighbourhood Plan and therefore facilitate development. Doing so would appear to not be 'in general conformity with the strategic policies of the Local Plan', contrary to paragraph 184 of the NPPF.
- 2.30 It is our understanding therefore that there is no mechanism for our client's land at Gooseacre to come forward for residential development, unless it is allocated and thereby removed from the Green Belt within the LPP2, despite it being a clear and obvious site for development and despite the benefits associated, as detailed in section 3 of these representations.
- 2.31 To summarise, it is considered that, as currently drafted, LPP2 results in a number of small sites within the Vale remaining within the Green Belt for the foreseeable future; despite the conclusions of the recent Green Belt Study, which identifies certain sites as not contributing to the fundamental aims and five purposes of the Green Belt, as prescribed at paragraph 80 of the NPPF. It is also noted that the LPP2 is the most appropriate forum for facilitating the release of such sites, and enabling such sites to make a positive contribution to the District's overall housing stock. As noted within the preceding paragraphs, strong examples are our client's 'Triangular Field' (ABIG05) parcel of land at Abingdon which, as noted above, does not contribute to the Green Belt and is therefore 'not a logical part of the Green Belt', and our client's land at Gooseacre (RADL11). Their retention within the Green Belt therefore is considered a missed opportunity and we request that further consideration is given and ultimately that they are allocated for development as part of LPP2.

Housing Requirements and Allocations

- 2.32 Core Policy 4a: 'Meeting our Housing Needs' confirms the quantum of unmet housing need for Oxford City as 2,200 homes, as agreed by the Oxfordshire Growth Board in September 2016. The policy also acknowledges that 3,850 dwellings will be allocated through the LPP2 which will ensure that the agreed quantum of unmet housing need for Oxford City (2,200 dwellings) will be addressed. The 3,850 dwellings to be allocated within the district is split between the Abingdon-on-Thames and Oxford Fringe Sub-Area (2,450 dwellings) and the South East Vale Sub-Area (1,400 dwellings). Paragraph 2.19 of the LPP2 confirms that 80% of agreed unmet need will be addressed within the Abingdon-on-Thames and Oxford Fringe Sub-Area (equating to 1,760 dwellings), and 20% will be addressed within the South East Vale Sub-Area (equating to 440 dwellings).
- 2.33 Our client remains in broad support of this approach and considers that, as the quantum for Oxford City's unmet need was agreed in September 2016 (Core Policy 4a) and the LPP1 was adopted in December 2016, it is the responsibility of LPP2 to allocate Oxford City's unmet need (2,200) plus the remainder of the requirement not allocated within LPP1 (5321).
- 2.34 Core Policy 4a notes three site categories: strategic sites (delivery within Local Plan Part 1), additional sites (delivery within Local Plan Part 2) and additional dwellings (e.g. windfalls), which according to the Policy 'will be delivered through Neighbourhood Development Plans or through the Development Management Process'. It is accepted that the strategic sites are allocated within LPP1 and the additional sites are proposed allocations within LPP2. Our client does however suggest that the Council reconsiders the reliance on Neighbourhood Plans to deliver the 'additional dwellings', as discussed further at paragraph 2.2.15 below.
- 2.35 Core Policy 8a (Additional Site Allocations for Abingdon-on-Thames & Oxford Fringe Sub-Area) repeats those tables shown in Core Policy 4a and confirms the allocated sites that will make up the 2,450 dwellings to come forward within the Abingdon-on-Thames & Oxford Fringe Sub-Area.
- 2.36 Our client supports the proactive approach adopted by the Council in looking to meet its proportion of Oxford City's unmet housing needs. Moreover, our clients also support the

¹ Core Policy 4a details the completions (3,065), commitments (4,468) and LPP1 allocations (12,495); equating to 20,028 dwellings - 532 less than the required 20,560. The requirement shown in Core Policy 4a includes the 2,200 unmet need figure.

approach of focussing the majority of allocated sites within the Abingdon-on-Thames & Oxford Fringe Sub-Area due to its proximity to Oxford City and the associated sustainability of these areas in locational and accessibility terms.

- 2.37 Notwithstanding the above, our client considers that a number of sustainable and deliverable sites within proximity of Oxford City have been unnecessarily discounted within the LPP2.
- 2.38 Our client further notes that the Dalton Barracks allocation forms a significant proportion of the development that is expected to come forward within the Abingdon-on-Thames & Oxford Fringe Sub-Area over the Plan period. Of the 3,850 dwellings expected to come forward within the Sub-Area, 1,200 are proposed at the Dalton Barracks site, as discussed further in Core Policy 8b (Dalton Barracks Comprehensive Development Framework).
- 2.39 It is clear that the category 'additional sites' (delivery within LPP2) is somewhat broad in quantum. Core Policy 8a notes that of the six proposed allocations for the Abingdon-on-Thames and Oxford Fringe Sub-Area, three sites are significantly larger than 200 units: North East Marcham is proposed for 400 dwellings, East of Kingston Bagpuize with Southmoor for 600 dwellings and Dalton Barracks for 1,200 dwellings.
- 2.40 Whilst our client does not wish to make specific comment in relation to the sustainability or suitability of these sites, we question the reliance on these relatively large sites delivering such a high proportion of need and would suggest, given the context of LPP2 for 'additional sites', that a number of smaller sites may be better placed to meet this need in the short to medium term. We discuss this in more detail, with regard to Dalton Barracks at 2.3.24 below.
- 2.41 We would suggest that this approach is more consistent with the original aims of LPP1 and Radley College therefore suggest that the LPP2 can achieve more flexibility by focusing on the scope for allocating a broader range of sites of varying scales, some of which can typically be brought forward sooner, with on-site completions achieved soon after commencement.

Windfalls

- 2.42 As indicated within the table at Core Policy 4a, it is expected that in total 1,100 dwellings will come forward via windfalls within the Plan period. We note that this windfall allowance has been divided between the sub-areas within the district as follows:

- 308 dwellings within the Abingdon-on-Thames & Oxford Fringe Sub-Area
- 484 dwellings within the South East Vale Sub-Area
- 308 dwellings within the Western Vale Sub-Area

2.43 Radley College notes that within the LPP2 - Preferred Options document, published earlier this year, the windfall allowance was 820 dwellings over the Plan period. Therefore, the windfalls allowance has risen by 260 dwellings over the Plan period since the last consulted version of the Plan. We note that the LPP2 - Publication Version confirms that the windfall figure of 1,100 dwellings has been updated in order to reflect past delivery.

2.44 On page 32 of Topic Paper 2 it states that the Council has reviewed the completions on small housing sites that have taken place between 2011/12 and 2016/17, and concludes that this demonstrates that small housing sites are a reliable source of supply in the district and therefore the Council have increased its windfall allowance from 70 dwellings a year to 100 dwellings a year.

2.45 The NPPF states the following at paragraph 48:

“Local planning authorities may make allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. An allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”

2.46 Although the Council has considered historic windfall delivery rates, we consider that there does not appear to be ‘compelling evidence’ for its windfalls allowance of 1,100 dwellings.

2.47 Table 4.3 on page 32 of Topic Paper 2 provides the completions on small housing sites between the period 2011/12 to 2016/17. A simple calculation clarifies that the average completions across this period equates to 169 dwellings per annum. However, it is noted that this is skewed by years 2015/16 which saw 186 completions and 2016/17 which saw 448 completions. Removing these two specific years and calculating the average dwellings per annum between years 2011/12 to 2014/15 results in an average delivery figure of 95 dwellings per annum. Should the figures for all years be included, we consider

that further justification would be helpful particularly for year 2016/17 (448 dwellings) as this is not reflective of any of the previous years.

2.48 Although the Council have provided historic windfall delivery rates to justify its windfalls allowance, there is no reference to the Council's Housing Land Availability Assessment nor expected future trends therefore, it is considered that further clarification in this regard is required in order to appropriately justify the windfall allowance in accordance with paragraph 48 of the NPPF.

2.49 In addition to the above point, we note that the text directly above the table at Core Policy 4a states:

“Additional dwellings (for example, windfalls) will be delivered through Neighbourhood Development Plans or through the Development Management Process.”

2.50 We have undertaken a review of the Neighbourhood Plans that have either been adopted or currently emerging. We note that at the current point of time there are five adopted Neighbourhood Plans. Out of these five adopted Neighbourhood Plans, it is our understanding that only the Drayton Neighbourhood Plan is allocating sites for housing. The settlement of Drayton lies within the Abingdon-on-Thames & Oxford Fringe Sub-Area.

2.51 It is accepted that some Neighbourhood Plans are currently being prepared, for example our clients are fully aware of the progress Radley Neighbourhood Plan has made. However, this also potentially raises concerns as Neighbourhood Plans do, given the level of work involved and the inherent nature of the planning process, take a long time to become 'made'. Of those Neighbourhood Plans that are adopted it is suggested there is a disparity between LPP2 and the anticipated delivery figures of Neighbourhood Plans. It is submitted therefore that the Council may have overestimated the amount of housing allocations which are expected to come forward within the district over the Plan period.

2.52 Our client is concerned that the Plan is not flexible and has not sufficiently demonstrated deliverability of this component of the housing land supply.

2.53 Moreover, our client concludes that this further supports the notion that additional allocations could be included within the LPP2, to account for the disparity. The Triangular Field (ABIG05) is a highly sustainable site which could positively assist in doing so.

Dalton Barracks

- 2.54 As indicated at Core Policy 4a and Core Policy 8a (Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area), the largest allocation within the Abingdon-on-Thames & Oxford Fringe Sub-Area, is the Dalton Barracks site which is to provide 1,200 dwellings within the Plan period. Publicly available information suggests that the site is not due to come forward until 2029. However, our client notes that paragraph 2.53 of the LPP2 Publication Version document states that “dialogue between the Defence Infrastructure Organisation (DIO) and the District Council has identified an opportunity to release the site sooner than 2029 and the Council is satisfied that 1,200 homes can be delivered on the site within the plan period up to 2031”. However, there is no evidence provided within the LPP2 - Publication Version or its evidence base which details the dialogue between the DIO and the District Council to justify that 1,200 homes can be delivered before 2029.
- 2.55 In addition, a Housing Study prepared by Wessex Economics, dated May 2017, which forms an evidence base to the Draft Vale of White Horse and South Oxfordshire District Joint Housing Delivery Strategy document that was published for public consultation in October 2017, refers (at paragraph 4.84) to the above MOD document noting an indicative release date of 2029 but makes no reference to the fact that housing will be delivered on this site earlier than this date.
- 2.56 We therefore consider that the Council cannot rely on a substantial part of its housing requirement within the Abingdon-on-Thames & Oxford Fringe Sub-Area on a site which is likely to deliver the majority of dwellings post 2031. Accordingly, it is suggested, in order to assist the Council, that the LPP2 should allocate additional smaller sites which can generally be brought forward at a quicker rate, with on-site completions soon after commencement to ensure that the district is able to meet its housing requirement. This is further emphasised by paragraph 3.11 within Topic Paper 2, as discussed earlier in these representations.
- 2.57 Examples of this includes the sites being promoted by our client which are non-strategic sites that could come forward at an early stage in the plan ensuring ongoing delivery within the plan period.

3.0 DEVELOPMENT ASPIRATIONS FOR RADLEY

North Radley & Gooseacre: Community Facilities and Enabling Residential Development

- 3.1 As noted within Section 2 of these representations, Radley College own land at Gooseacre and North Radley, as well as the Triangular Field. Focussing on Gooseacre and North Radley, our client considers that both sites can be sensitively developed, in order to provide much needed development and to directly compliment the strategic allocation at North West Radley. Radley College is a long standing employer and landowner within Radley and the surrounds, and therefore has a direct and vested interest in the development of the area. Indeed, the College itself may well surpass the lifetime of much of the existing development and therefore the future of Radley is imperative to it. Radley College therefore remains committed to playing its part in delivering the requirements and aspirations of the community, in order to help Radley thrive. The College understands that in some instances there are limitations and is therefore keen to deliver something benevolent in the interests of the village, to ensure the optimum outcome for Radley for current and future residents.
- 3.2 Our client emphasises that the College is not proposing the wholesale release of North Radley for housing, or for any new housing on that site at the present time. As is detailed further within this section, the College wish, as part of the LPP2 process, to enable the release of the Gooseacre site for small scale development only, in order to facilitate delivery of enhanced facilities at North Radley.
- 3.3 Currently, the Village Hall occupies our client's land at Gooseacre but this is recognised to be in need of expansion/replacement given the planned development for the village at North West Radley and the overall growth of the village. Given the size constraints of Gooseacre there is concern that the Village Hall will be unable to be suitably expanded, in order to accommodate the increase in residents. It is also fair to note that the current facility, while in a good interior state of repair, is somewhat dated and could benefit from modernisation and enlargement to reflect the needs of a growing, modernised Radley Village.

- 3.4 Moreover, the primary school currently occupies land at North Radley but as a result of existing capacity issues coupled with the planned development at North West Radley, it requires expansion in order to accommodate the projected increase in residents/pupils. This is widely acknowledged.
- 3.5 Given that our client has both a historic and future vested interest in Radley and its ultimate sustainability, the College are keen to ensure opportunities for sustainable growth and change are fully maximised. It is therefore the desire of Radley College to deliver a new, enlarged and improved Village Hall, however it is considered that the current site is too constrained to accommodate the required new building. The College is also committed to working collaboratively with the County Council and key stakeholders to deliver an improved primary school solution for the Village, particularly given the College's commitment to educational provision within the village. It is considered that both new facilities could be successfully delivered as part of a holistic development, which delivers tangible community benefits to both new and existing residents.
- 3.6 The map contained within **Annex 4** of these representations visually demonstrates how the proposed relocation would be achieved. The map shows the existing Village Hall and playing fields highlighted in green, and their proposed relocation site to the north, highlighted in yellow. The map also shows how it is envisaged the school will be able to expand on the current site, as highlighted in red. For context, land allocated within the Local Plan Part 1, identified as NW Radley, is highlighted with a red boundary.
- 3.7 As is evident from the map this relocation will create a new 'Village Hub' and therefore an enlarged parking and drop-off section is also highlighted in blue. Brought forward in connection with the development of land at NW Radley, this location will become more central to the main area of housing within Radley and, crucially, enable much improved facilities to be created, for the benefit of the entire community. Moreover, siting the Village Hall, primary school and an element of public open space together in one location, is considered a major benefit given the synergies and complimentary uses.
- 3.8 Our client proposes the release of the Gooseacre site, and a proportion of the land at North Radley to deliver small scale new housing and enhanced community facilities, respectively. Given the Green Belt designation LPP2 is considered the appropriate mechanism to do facilitate this strategy. To conclude Radley College would note that good support has been received for this option by local residents and stakeholders, following engagement throughout. This is referenced within the Neighbourhood Plan evidence base, which should be taken into consideration in this regard.

Land off Radley Road, Abingdon-on-Thames - 'The Triangular Field'

- 3.9 'The Triangular' Field (ABIG05) is located on the eastern edge of the settlement of Abingdon-on-Thames and currently comprises a 1.85 hectare triangular arable field which is periodically used for planting crops. The field is currently fallow.
- 3.10 As indicated earlier, our client supports the findings of the Green Belt Review that the Site currently fails to fulfil the NPPF objectives (paragraph 80 of the NPPF) of including land within the Green Belt, as noted at paragraph 2.1.6 above, and submits that there is a very clear and convincing case to justify release of the Site for small scale residential development. For example our client submits that development of the site in the short term would represent a logical and sustainable extension to the existing Peachcroft Estate, and that new housing in this location, by virtue of the specific merits of the site and its natural containment, would have very limited impact upon the openness of the wider Green Belt.
- 3.11 The Green Belt in this area is principally designed to protect Oxford from merging with neighbouring towns. Abingdon-on-Thames is appropriately described as a market town and in this location it has little direct relationship with Oxford. The term 'town' is not a description which sits comfortably with the village of Radley, however it is noted that criterion 2 of Table 1.0 of the Green Belt Review (Assessment Criteria) notes that though most of the settlements in the Vale are villages rather than towns (including Radley), '...the Vale would not wish to allow these settlements to merge.'
- 3.12 We consider that the release of the Triangular Field (ABIG05) from the Green Belt and future development for housing would not decrease the gap between Abingdon-on-Thames and Radley either physically or psychologically.
- 3.13 Moreover it is submitted that the current Green Belt designation is not truly reflective of the Site's location or spatial function and it cannot credibly be maintained that development of the Site would represent significant encroachment into open countryside, reinforced by the most recent Green Belt Study. There is a need for pragmatism in this regard in the interests of good planning and in the interests of achieving the Council's objectives.
- 3.14 The Site does not fulfil any of the five purposes of including land within the Green Belt: the Green Belt designation is ineffective, and its retention within the Green Belt is not

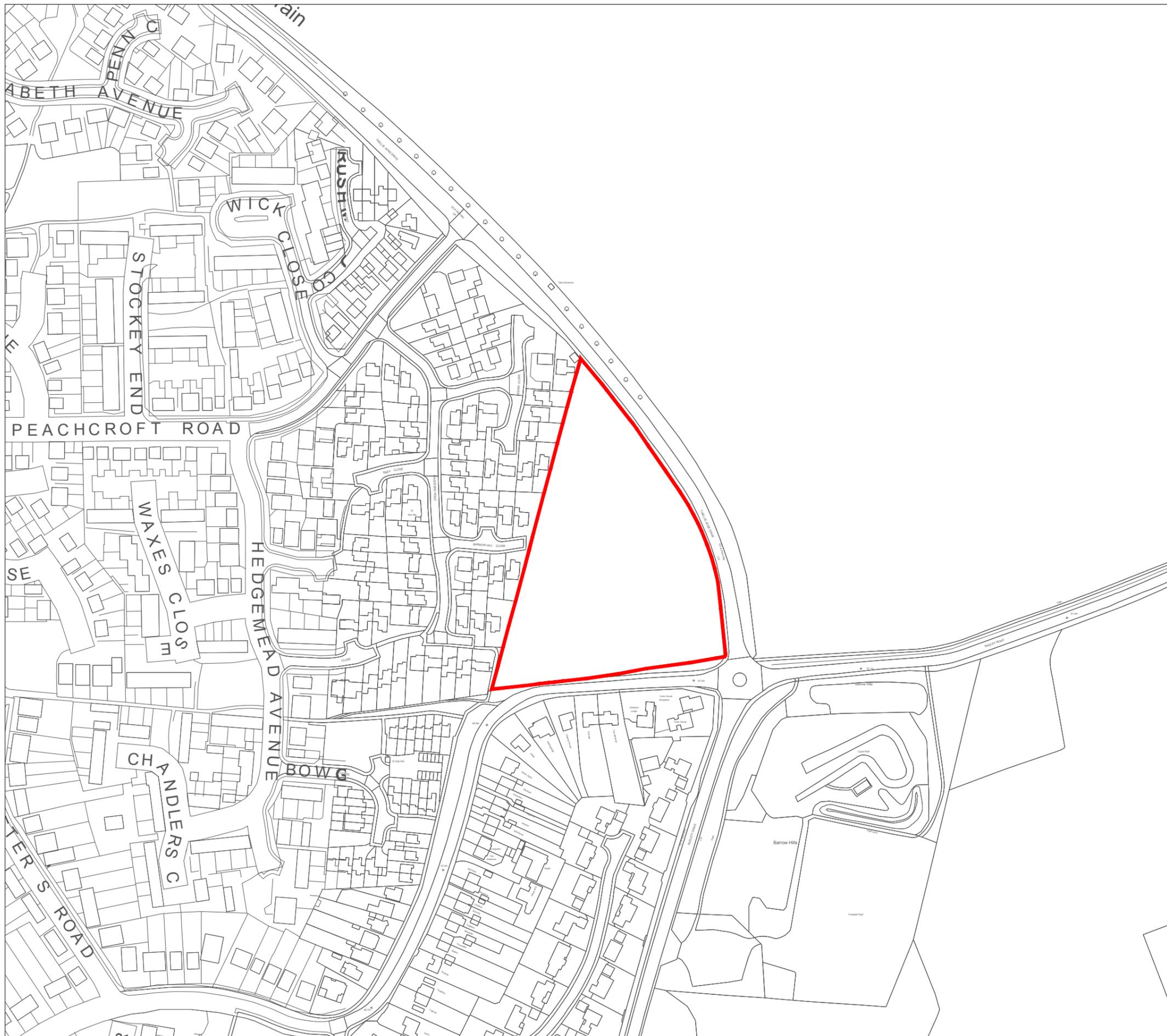
considered to represent positive and proactive planning as required by the NPPF. A review of Green Belt boundaries is entirely appropriate through the Local Plan process, and indeed as previously noted, in accordance with national planning policy. To this end the College has, and continues to be, committed to engaging with the local authority as the new Local Plan develops and would welcome further discussions in relation to LPP2 and the potential scope for the release of this site. The Site is readily available, sustainable and deliverable, and would make a valuable contribution to housing delivery and the five year housing supply within the short term. This is a particularly pertinent point when larger sites such as those currently proposed within the LPP2 can arguably take a number of years to come to fruition.

- 3.15 The location of site ABIG05 on the edge of the existing Peachcroft Estate means that the site would constitute a natural extension to the existing development - the last 'piece of the jigsaw'. The site is devoid of any ecological merit, is flat, tree-less and environmentally unconstrained. The Site can be accessed satisfactorily, and can be designed to integrate with, and sympathetically to, its immediate surroundings.
- 3.16 Our client notes that the Council recognised that the Site does not fulfil a true Green Belt function and could be released from this designation in order to free up the potential for it to deliver small scale residential development in the short term. However, this has not been translated to the LPP2, where the site continues to remain in the Green Belt despite the findings of the Green Belt Review and the clear conclusions drawn (coupled also with the comments made by the Inspector at paragraph 100 of his LPP1 Report – see paragraph 2.4 above).
- 3.17 The College supports the release of the Site from the Green Belt and submits that the Site is fully deliverable and could make a valuable contribution towards housing supply in the VoWH in the short term. It is a logical step forward representing proactive and pragmatic planning that is entirely congruous with national objectives. On this basis it is promoted as a suitable and sustainable site for small scale housing development in the region of 50 dwellings.

4.0 CONCLUSIONS

- 4.1 Radley College supports the proactive approach that has been taken by the Council in seeking to accommodate the agreed proportion of Oxford City's unmet needs. However, the College has made some suggestions which are intended to assist the Council in ensuring the soundness of the LPP2 document, principally by ensuring that the Plan is consistent with its evidence base and robust with regard to delivering the housing requirement to which it's tasked
- 4.2 The College's sites discussed herein lie within sustainable locations which provide good transport links to Oxford and the surrounding areas. It is considered that Radley and Abingdon can play an important role in helping to meet the housing needs for the district and unmet needs from Oxford City, whilst also providing a future sustainable and attractive place for families to live.
- 4.3 Our client requests that the Council carefully reconsiders the conclusions of the 2017 Green Belt Study. Moreover, the District Council should also carefully assess whether large sites such as Dalton Barracks will deliver as proposed and consider the consequences to the 5 year housing land supply if this does not occur. The Local Plan should plan for these eventualities where the outcome is uncertain, either via reserve sites or a larger number of smaller allocations.
- 4.4 With regard to the above Radley College request that 'The Triangular Field' (ABIG05) is released from the Green Belt as part of the Local Plan Part 2, so it is able to contribute to this need. Moreover, we would ask the Council to carefully consider the proposals within Section 3, in relation to the combined development of Gooseacre and North Radley and the positive community benefits that would arise if this were made possible by the release of the required land from the Green Belt, as part of the LPP2.
- 4.5 On behalf of Radley College we trust that the comments and views contained within these representations are helpful and importantly are viewed as constructive. As ever, the College is keen to work collaboratively with the Council and interested parties, and would welcome the opportunity for further discussions on any of the matters raised herein.

APPENDIX 1



The scaling of this drawing cannot be assured
 Revision _____ Date _____ Drn _____ Ckd _____

 Land off Radley Road,
 Abingdon-on-Thames
 - 1.85Ha / 4.57Ac

Project
RADLEY VILLAGE



Drawing Title
**CALL FOR SITES
 - LAND OFF RADLEY ROAD**

Date	Scale	Drawn by	Check by
20.07.16	1:2500@A3	M.D.	M.U.
Project No	Drawing No	Revision	
21979	RG-M-33-4	-	



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APPENDIX 2



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Revision	Date	Drn	Ckd

 Land at Goose Acre, Radley
- 1.38Ha / 3.41Ac

Project
RADLEY VILLAGE



Drawing Title
**CALL FOR SITES
- LAND AT GOOSE ACRE**

Date	Scale	Drawn by	Check by
20.07.16	1:2500@A3	M.D.	M.U.
Project No	Drawing No	Revision	
21979	RG-M-33-2	-	



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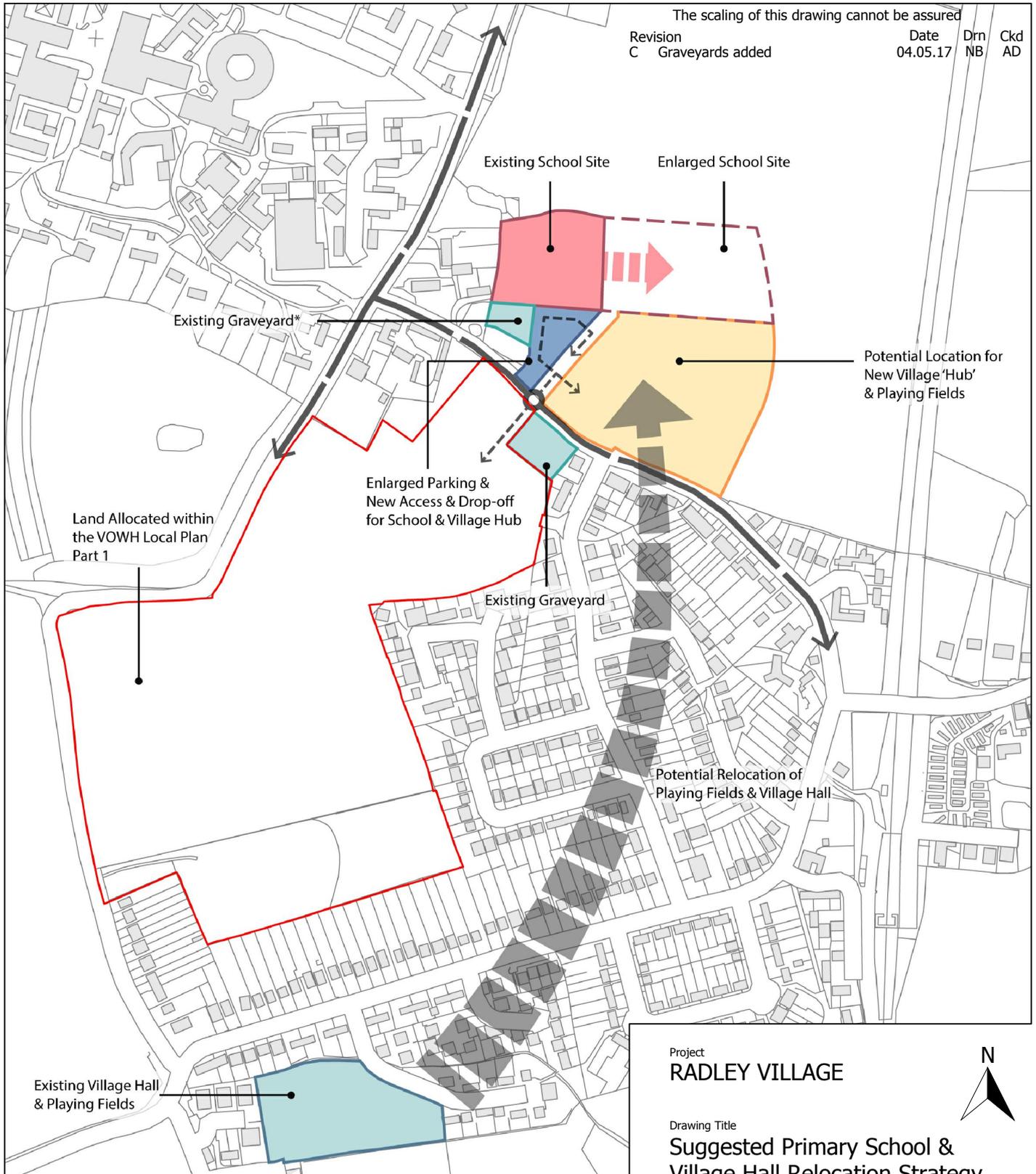
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APPENDIX 3

APPENDIX 4



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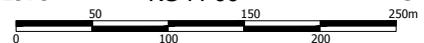
Revision	Date	Drn	Ckd
C	04.05.17	NB	AD

*Potential for expansion of graveyard to be considered as part of the relocation strategy

Project
RADLEY VILLAGE

Drawing Title
Suggested Primary School & Village Hall Relocation Strategy

Date	Scale	Drawn by	Check by
27.04.17	1:5000@A4	NB	AD
Project No	Drawing No	Revision	
21979	RG-M-66	C	



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