
Examination into the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites

Written Statement on behalf of The University of Oxford (ID 902666)

Hearing Statement: Matter 2

June 2018

**Examination into the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies
and Additional Sites**

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Hearing Matter 2: Unmet Housing Needs from Oxford

Project Ref:	17838/A5/P1/MO	17838/A5/P1a/MO
Status:	Draft	Final
Issue/Rev:	P1	P1a
Date:	7 th June 2018	12 th June 2018
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Ref: 17838/P1a/A5/MO/NPN/dw

Date: 12th June 2018

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1.0 INTRODUCTION

- 1.1 This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2031: Part 2 on behalf of the University of Oxford (hereafter referred to as 'the University').
- 1.2 This statement responds to questions 2.3, 2.4, 2.5, 2.6 and 2.7 posed under 'Matter 2: Unmet Housing Needs from Oxford Issue', identified by the Inspector in his List of Matters and Questions.

2.0 MATTER 2 - UNMET HOUSING NEEDS FROM OXFORD

Question 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?

- 2.1 The University considers that the Council's spatial strategy of meeting Oxford City's unmet housing needs within the Abingdon on Thames and Oxford Fringe Sub Area is appropriate. This Sub Area lies closer to Oxford City than the South East Vale Sub Area and the Western Vale Sub Area therefore, in supporting sustainable growth, it is logical to locate sites to meet the City's unmet needs within this Sub Area.
- 2.2 However the University does have concerns regarding the Council's spatial approach of its allocated sites within the Abingdon on Thames and Oxford Fringe Sub Area in meeting Oxford City's unmet needs.
- 2.3 As indicated at Policy 8a of the Council's Local Plan Part 2 (LLP2) Publication Version, October 2017 (Ref: CSD01), the proposed housing allocations within the Abingdon on Thames and Oxford Fringe Sub Area are located at the Larger Villages of Kingston Bagpuize with Southmoor (600 dwellings), Marcham (90 dwellings) and East Hanney (two allocations totalling 130 dwellings). In addition, 1,200 dwellings are proposed at Dalton Barracks (please see our response to Question 2.6 below regarding this site).
- 2.4 As indicated at Core Policy 3 of the Council's adopted Local Plan Part 1 (LPP1), December 2016 (Ref: ALP02), a Larger Village is defined as:
- ".....settlements with a more limited range of employment, services and facilities. Unallocated development will be limited to providing for local needs and to support employment, services and facilities within local communities." (Our emphasis)**
- 2.5 Given that Large Villages are defined as having a more limited range of employment, services and facilities, we find it rather surprising that the Council has decided to focus four of its five allocations at Larger Villages within this Sub Area.

- 2.6 Furthermore, out of these Larger Villages, the closest that lie to Oxford City are Marcham and Kingstone Bagpuize with Southmoor which are, approximately, 10 miles from the City. In respect to the settlement of Kingstone Bagpuize with Southmoor, we note that the Sustainability Appraisal, September 2017 (Ref: CSD09) refers (page 45) to Oxfordshire County Council's (OCC) consultation response to the Preferred Options consultation of the Plan. OCC stated in their response that this settlement is 'red' rated (therefore 'least well-connected') mainly due to its distance from Oxford and a lack of current or proposed sustainable transport options.
- 2.7 We are therefore again surprised that considering these allocations are assisting in meeting the unmet needs of Oxford City, that the Council are putting reliance on sites that are located at settlements which are not within close vicinity (i.e. within 5 miles) of the City.
- 2.8 However, in contrast, the settlement of Botley has not received any housing allocations. This settlement is described by the Council as a 'Local Service Centre'. Core Policy 3: Settlement Hierarchy within the Council's LLP1- Strategic Sites and Policies document (Ref: ALP02), defines a Local Service Centre as having:

".....a level of facilities and services and local employment to provide the next best opportunities for sustainable development outside the Market Towns."

- 2.9 Page 8 of the LPP1, which is also indicated at Page 20 of the LPP2, states that one of the main strands of the districts spatial strategy is to *"reinforce the service centre roles of the mains settlements across the district"*. However, the settlement of Botley, identified as a Local Service Centre and therefore above Larger Villages within the settlement hierarchy, has not received allocations for development in the Part 1 Local Plan, and is neither proposed to accommodate further growth in the LPP2 - Publication Version.
- 2.10 Botley is a sustainable location as clearly indicated by the fact that the settlement is identified as a Local Service Centre. In addition, 'Core Policy 11: Botley Central Area' of the Local Plan Part 1 document sets out requirements for, a comprehensive retail-led redevelopment and upgrading of Botley Central Area. We are aware that a planning application was granted permission in September 2016 for the redevelopment of this existing centre (otherwise known as the 'West Way area regeneration') which further supports the sustainable credentials of this settlement.
- 2.11 In addition Botley lies within proximity to Oxford City, approximately 2 miles from the centre of the City, accessible via the Botley Road with regular buses (approximately nine an hour) to Oxford City centre, with a journey time of approximately 10 minutes.

- 2.12 The proximity of Botley to Oxford City is emphasised within the County Council's Spatial Options Assessment (LUC, 2016), as referred to on page 17 of the Sustainability Appraisal, which states:

"Within the Vale, sites at Botley and Cumnor were found to have comfortably the best links to Oxford....."

- 2.13 We therefore consider, in response to the Inspector's question, that the Council should re-evaluate its spatial strategy for the Abingdon on Thames and Oxford Fringe Sub Area, to look at allocating sustainable sites at the Local Service Centre of Botley which is within vicinity of Oxford City, therefore can assist in meeting the City's unmet needs.
- 2.14 Two examples of suitable sites are 'Land north of Hazel Road, Botley' (HELAA Ref: BOTL01) and the 'Allotment site to the west of Tilbury Lane, Botley' (HELAA Ref: BOTL09).
- 2.15 At the Preferred Options stage of the Plan, both of these sites were unfairly discounted for consideration as allocations within the LPP2 as the Council concluded that these sites had insufficient capacity for residential development. Yet we contested the Council's site selection methodology as they had used an average 25 dwellings per hectare figure to work out the capacity of sites which meant that our client's sites were discounted as they were considered to have a capacity of less than 50 dwellings, and therefore not taken forward within the selection process.
- 2.16 'Land north of Hazel Road, Botley' is former safeguarded land which was removed on adoption of the Local Plan 2011 but not allocated for development as 150 dwellings at Tilbury Lane (site located to the west of 'Land north of Hazel Road, Botley') was considered sufficient at the time. As a result, this site constitutes as 'white land' on the Council's proposals map meaning that it is without any specific designation or allocation in the Local Plan and accordingly free from any restrictive planning policies. As this land was left available to accommodate future growth, we consider that this is an appropriate opportunity to accommodate such growth as an allocation through the LPP2. This site is considered to have a capacity of approximately 60 dwellings.
- 2.17 The client's intention for the 'Allotment site to the west of Tilbury Lane, Botley' is for the existing allotments to be re-located within Green Belt land to the north east and north west of Tilbury Lane, Botley (Referred to as BOTL10 and BOTL11 within the HELAA) which are also in the ownership of the University. It should be noted that allotments are a compatible land use within the Green Belt. Therefore, there is an opportunity to make available a suitable development site within the settlement area of Botley and re-locating the existing allotments

to an appropriate location to the immediate north of the Tilbury Lane development. This site is considered to have a capacity of approximately 50 dwellings.

- 2.18 Both sites are within a walking distance (400m) of the B4044 which has bus stops that, as indicated above, provide regular buses (approximately nine an hour) to Oxford City centre, with a journey time of approximately 10 minutes. The sites are also within a mile of the centre of Botley which offers a variety of services and facilities, and employment opportunities.

Question 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?

- 2.19 We believe that the stated strategy for meeting the unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area has not been followed through in the LPP2.
- 2.20 We consider that the Council have missed an opportunity to allocate development at sustainable settlements which lie closer to Oxford City than the proposed allocations within the LPP2.
- 2.21 As indicated above, given its status as a Local Service Centre and vicinity to Oxford City, we find it surprising that the Council has not allocated any housing sites at the settlement of Botley, especially as this settlement did not receive any allocations within LPP1. This is particularly pertinent as the district's spatial strategy seeks to reinforce the service centre roles of the main settlements across the district, indicated both within LPP1 and LPP2.
- 2.22 In addition, as it is a sustainable settlement in proximity to Oxford City, we consider that the Council's site selection methodology has overlooked sustainable locations (our client's sites as exemplified in our response to Question 2.3 above) at Botley that could assist the district in meeting the City's unmet needs.
- 2.23 The University therefore considers that the Plan is not sound as it has not been positively prepared as it fails to support the spatial strategy set out within the LPP1 by overlooking the opportunities of allocating sites at the sustainable settlement of Botley within the Abingdon on Thames and Oxford Fringe Sub Area.

Question 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?

- 2.24 We note that paragraph 2.67 of the LPP2 - Publication Version document talks about the release of land from the Green Belt through the Local Plan process and refers to the following text within the Planning Inspector's Report to the LPP1:

"retaining these parcels of land in the Green Belt now would not prevent their deletion from Green Belt through the 'Part 2' plan or any other local plan or local plan review, if the necessary exceptional circumstances were to be demonstrated"

- 2.25 The LPP1 Inspector therefore concludes that, where exceptional circumstances are demonstrated, it is appropriate for the Council to release further parcels of land from the Oxford Green Belt in the LPP2.
- 2.26 In meeting the Council's own housing need and the unmet need from Oxford City, the Council has taken the decision that there are exceptional circumstances to remove land from the Green Belt at the Dalton Barracks site.
- 2.27 However given LPP1 Inspectors' conclusions above, we consider that the Council has failed in taking a proactive stance in considering the release of further sustainable sites from the Green Belt which lie within the vicinity of Oxford to assist in meeting the City's unmet needs.
- 2.28 An example of a sustainable site within the Green Belt is the University's 'Land at Oxford University, Said Business School' which is located to the north of the Larger Village of Kennington, accessible from the A34 and within approximately 2 miles from the Oxford City centre.
- 2.29 Within our Regulation 19 representations we have provided a justification for why this site does not meet the purposes of the Green Belt as indicated by paragraph 80 of the NPPF. In addition, the Oxford Green Belt Review Study (October 2017) (Ref: NAT03) concludes (page 27) that the contribution of this site to the purposes of the Green Belt would be 'low' for three out of the four purposes.

- 2.30 The Study states, at paragraph 1.3, that the *"site is highly contained by roads, existing settlement and tree belts, which limit the potential for encroachment of any future development beyond the site boundary"*. In summary the Study states, at paragraph 1.6, that this site (the southern part) has potential for development *"without significant harm to the wider Green Belt designation."*
- 2.31 We therefore consider that there are opportunities to release further land from the Green Belt within the vicinity of Oxford City which are located within sustainable locations which do not meet the purposes of the Green Belt as set out in paragraph 80 of the NPPF.
- 2.32 In addition, the University have concerns regarding the delivery of the Dalton Barracks site within the Plan period (see response to Question 2.6 below) and the Councils' reliance of a high windfall rate (see our response to questions posed under Matter 8). Therefore, such sustainable sites will also assist in ensuring the Council are able to meet its own housing needs and the unmet needs of Oxford City.

Question 2.6

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

- 2.33 As indicated at Core Policy 4a and Core Policy 8a of the LPP2, 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. Therefore approximately 59% of the housing proposed within the Abingdon-on-Thames & Oxford Fringe Sub-Area, is expected to come forward at Dalton Barracks site.
- 2.34 The LPP2 states that this site was originally set to be released by 2029, however paragraph 2.53 of the LPP2 Publication Version (CSD01) 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"*.
- 2.35 We note that since the Regulation 19 consultation of the LPP2, the Council has agreed a Statement of Common Ground (SCG17) with Carter Jonas on behalf of The Defence Infrastructure Organisation (DIO), dated March 2018.

- 2.36 Paragraph 2.4 of this Statement of Common Ground states that dialogue between the DIO and the Council has identified an opportunity for the development of the site to begin in 2024, ahead of the release of the main barracks by 2029. Therefore, the Council are satisfied that 1,200 homes can be delivered in the plan period up to 2031.
- 2.37 Paragraph 2.6 states that the DIO will look to appoint a development partner prior to the military vacation of the site, and once appointed, the development partner will work with the DIO and the Council to ensure that the necessary detained planning permissions are achieved to enable the implementation of a comprehensive scheme.
- 2.38 Firstly, we note that there is no evidence that has been presented by the Council of the dialogue that has taken place with DIO and on what grounds they have concluded that the development of the site can begin in 2024.
- 2.39 Secondly, we consider that there is an element of risk by having such dialogue before a development partner has been appointed. A development partner will bring their own expertise and knowledge to a project which could result delivery timescales being reviewed.
- 2.40 We also question the proposed housing trajectory which is indicated at paragraph 3.20 of the Statement of Common Ground, which is also indicated within the Council Up-dated Housing Trajectory Paper, February 2018 (HOU03.1).
- 2.41 We note that within year 2024/25 it is expected that 50 dwellings will be delivered followed by 100 dwellings in 2025/26. However, this then shoots up to 200 dwellings per year for the period 2026/27 and then 225 in years 2029/30 and 2030/31.
- 2.42 Once again, we have no indication from the Council evidence as to what conclusions have been made to inform this trajectory.
- 2.43 In addition, we consider that the delivery of 200 dwellings from 2026/27 is unrealistic for a site of this scale. In November 2016, Nathaniel Lichfield & Partners (NLP) published 'Start to Finish – How Quickly do Large-Scale Housing Sites Deliver?'. This research provides a comprehensive review of 70 strategic sites which have/will deliver in excess of 500 dwellings. NLP's research focussed on a variety of locations with a focus on sites outside of London. This research finds that the annual average built-rate for sites 1,000 – 1,499 dwellings is circa 120 dwellings per annum.

- 2.44 On the basis of this research undertaken by NLP, we consider that the delivery of 200 dwellings from 2026/27 is overly-optimistic especially as a development partner has not been appointed. In addition, if the site is not released until 2024/25 then we consider, following site preparation, that realistically the site will start delivering in 2025/26. Therefore, if the trajectory was revised to indicate that 50 dwellings were delivered in 2025/26 and then 120 dwellings per annum for the period 2026/27 – 2030/31, then the site would only be able to deliver 650 dwellings. However, if development could only be brought forward at the point to which the main barracks is released at 2029, then the site could deliver as low as 50 dwellings on the basis that it could take a year for site preparation therefore the first delivery of dwellings would likely be within 2030/31. Therefore, we consider realistically Dalton Barracks could deliver approximately 50 – 650 dwellings within the Plan period.
- 2.45 On the basis of the above we have series doubts that 1,200 dwellings can be delivered at the Dalton Barracks site within the Plan period. This therefore puts into question whether the Council will be able to meet Oxford City's unmet needs considering the Dalton Barracks site forms such a significant part of the Council's housing allocation within the Abingdon-on-Thames & Oxford Fringe Sub-Area.
- 2.46 We therefore, consider that the Local Plan Part 2 should focus on allocating 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 if Dalton Barracks is only able to deliver late in the Plan period. This is further emphasised by paragraph 3.11 of the 'Topic Paper 2 - Site Selection' document which states that 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"*.

Question 2.7

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

- 2.47 We are concerned that the strategy for the LPP2 housing allocations does not provide sufficient flexibility as it is putting, in our view (see response to Question 2.6 above), an over-reliance on the Dalton Barracks site in delivering 59% of the housing proposed within the Abingdon-on-Thames & Oxford Fringe Sub-Area.

- 2.48 As indicated in our response to Question 2.6 above, we consider that the Dalton Barracks site will not deliver 1,200 dwellings within the Plan period (we expect that it could deliver approximately 50 – 650 dwellings) and therefore, in particular the latter part of the Plan period, we consider that the Council will struggle to meet the unmet needs of Oxford City.
- 2.49 We therefore consider that the LPP2 should focus on allocating additional smaller sites which can generally be brought forward at a quicker rate, with on-site completions soon after commencement, to ensure that the Council are able to meet the unmet needs of Oxford City. In addition, by allocating smaller sites which can generally be brought forward at a quicker rate provides greater flexibility for the Council to ensure a robust housing delivery strategy.