

VoWH Local Plan Part 2 Examination: Matters and Questions

Dandara Ltd Hearing Statement (Respondent ID: 758199)

Introduction

- 1.1 This Hearing Statement has been prepared by Dandara Ltd who are promoting land located to the West of Wantage for residential led, mixed-use development alongside the delivery of the West Wantage Link Road (WWLR), the route of which was safeguarded within the Local Plan Part 1 (LPP1). The site is not proposed for allocation within the Local Plan Part 2 (LPP2).
- 1.2 The Statement concisely addresses the relevant ‘*List of Matters and Questions*’ (ID/3) and should be read alongside representations made by Dandara Ltd to the emerging LPP2 dated March 2017 and October 2017. As requested, a separate Hearing Statement has been prepared for each matter and question being addressed.

Matter 2 – Unmet Housing Needs from Oxford

Question 2.3 – Unmet Housing Need Spatial Strategy

- 2.1 Pg. 21 of the LPP2 explains that the LPP1 allocates ‘strategic’ development sites to fully meet the Vale’s own housing requirement up to 2031 (20,560 homes). It then explains that the LPP2 will supplement this figure by delivering *inter alia* 2,200 homes to be delivered within the same period up to 2031 to “... *address the agreed quantum of unmet housing need for Oxford City to be met within the Vale ...*” (para. 2.5).
- 2.2 Para. 2.17 of the LPP2 is explicit that “*the Local Plan 2031: Part 1 identified land for strategic housing on a range of sites across the District, **including on sites close to, and easily accessible to Oxford***”. Such sites include those located at Abingdon-on-Thames, Kennington and Radley. Para. 2.18 goes on to acknowledge that “*it is the case that whilst the sites listed above are allocated within the Part 1 Plan with the primary intention of meeting the Vale’s own objectively assessed need for housing, the sites are also well located to provide for Oxford’s unmet housing need*”.
- 2.3 The Inspector’s Report for the LPP1 stated “... *the Plan as submitted (LPP1), proposes revision of the Green Belt boundaries around Abingdon-on-Thames, Radley and Kennington and the allocation of sites for more than 1,500 new dwellings. Whilst allocated with the primary intention of meeting the Vale’s own objectively-assessed need for housing, as discussed at the hearings, **Oxford City Council consider these sites to be well-located to provide for their own unmet housing needs. Notwithstanding the primary purpose of their allocation, housing on these sites would be available just as much to people falling with the category of Oxford’s need as to those of the Vale. And in reality, it would be all but impossible to determine if a potential occupier of this housing represents a Vale or Oxford housing need***” (para. 25).
- 2.4 In addition to the circa 1,500 homes allocated within the LPP1 in geographic proximity to Oxford City, the Inspector’s Report also recognised that those 3,000 plus dwellings allocated within the LPP1 at Valley Park in Didcot would likewise be attractive to those looking to access Oxford City due to the fast and frequent rail links (para. 56). **This is a total of 4,500 homes which, geographically, support unmet housing need arising from Oxford City and**

significantly exceeds the 2,200 dwellings which the VoWH has agreed to accommodate under the Duty to Cooperate. The Council's Site Selection Topic Paper (October 2017) concludes:

*"Reflecting the Inspector's views that the Part 1 Plan already allocates sites that could be considered to contribute to meeting the Vale's apportionment of Oxford's unmet need, it is considered appropriate that **the Vale's apportionment of Oxford's unmet need is to be addressed by a combination of the Part 1 strategic site allocations and Part 2 additional allocations**" (para. 4.7).*

- 2.5 Para. 2.31 of the LPP2 explicitly recognises that *"... it is also the case that, **in reality, any of the homes allocated across the two sub-areas [Abingdon-on-Thames / Oxford Fringe Sub-Area and South East Vale Sub-Area] could contribute towards the [Oxford City's] unmet needs ...**"*.
- 2.6 Both the VoWH and the Inspector who oversaw the examination of the LPP1 recognise that it is effectively impossible to identify 2,200 new homes within either iteration of the Local Plan that would be solely available to address Oxford's unmet need. In reality, a number of sites, including existing LPP1 allocations, within both the Abingdon-on-Thames and Oxford Fringe Sub-Area and South East Vale Sub-Area would be attractive to those unable to find or afford a suitable property in Oxford City.
- 2.7 Whilst it is accepted that the total number of new homes to be delivered in the VoWH across the LPP1 and LPP2 needs to include 2,200 dwellings to assist Oxford City under the DtC, as 4,500 houses are already allocated through the LPP1 in geographic proximity to the City, there is no justification for the LPP2 spatial strategy materially diverting from that established and adopted as sound within chapter 4 of the LPP1.
- 2.8 At the top of the settlement hierarchy sit the three 'market towns' of Abingdon-on-Thames, Wantage and Faringdon which LPP1 Core Policy 3 recognises as having *"... the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner"*. However, as recognised at para 10.3.2 of the SA *"... **no LPP2 allocations are proposed at a market town (Abingdon, Wantage, Faringdon)**"*.
- 2.9 Six of the seven allocations proposed within the LPP2 are located adjacent to settlements characterised as either 'larger villages' or 'smaller villages'. Core Policy 3 of the LPP1 describes development at the villages as reproduced in Figure 12 below:

Larger Villages

Larger Villages are 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.

Smaller Villages

The Smaller Villages have a low level of services and facilities, where any development should be modest and proportionate in scale and primarily be to meet local needs.

- 2.10 The LPP2 spatial strategy is proposing significant scale development at various village locations, such as East Hanney, Kingston Bagpuize and Marcham, which are characterised by

the LPP1 as being less sustainable and benefitting from only a limited range of employment, services and facilities with development to be primarily limited to that required to meet local needs. The approach is not only contrary to the spatial strategy and settlement hierarchy established within the LPP1 but is also in conflict with para. 17 of the NPPF.

- 2.11 The spatial strategy contained within the LPP2 is an outcome of the objective to maximise the number of new homes delivered in geographic proximity to Oxford City and Harwell without considering the sustainability of the settlements, the spatial strategy and settlement hierarchy established within the LPP1, previous recommendations made by the LPP1 Inspector nor a range of settlement and village specific constraints.
- 2.12 The LPP2 places great emphasis on the objective of the LPP1 to “... *set out a spatial strategy for the distribution of growth across the District*” (para. 1.21) with two of the three principal objectives being to focus sustainable growth within the Science Vale area and reinforce the service centre roles of the main settlements across the District (para. 2.3). The objective of locating new housing in close geographical proximity to Oxford and Harwell has taken precedence over the achievement of sustainable development by disregarding the LPP1 settlement hierarchy and spatial strategy.
- 2.13 Section 9.0 of our representations to the publication version LPP2 compares development on land West of Wantage which accords with the LPP1 spatial strategy by locating development adjacent to an inherently sustainable ‘market town’, ensuring ease of access to shops, services, community facilities and public transport modes. It then goes on to demonstrate that in contrast, the spatial strategy advocated by the LPP2 results in a range of adverse sustainability, environmental and highway impacts due to the unjustified focus on ‘villages’ to address unmet need arising from Oxford City from a purely geographical perspective and without regard to the evidence base regarding the complexities of the VoWH and Oxford City housing market.
- 2.14 Our Hearing Statement for Matter 1 demonstrates the unevidenced exclusion of land West of Wantage as a ‘reasonable alternative’ which has contributed to the LPP2 proposing development within unsustainable locations when both the LPP1, LPP2 evidence base and LPP1 Inspector recognise that there is no justification for departing from the LPP1 spatial strategy which looks to focus growth at the most sustainable ‘market towns’ as 4,500 new homes have already been allocated within the LPP1 within the Abingdon on Thames and Oxford Fringe Sub Area alongside Valley Park, Didcot which would all contribute to meeting the 2,200 unmet need figure from Oxford City.
- 2.15 The LPP2 spatial strategy cannot therefore be considered as ‘justified’ and the most appropriate when considered against reasonable alternatives due to proposing new housing in unsustainable locations when this is not required to deliver 2,200 new homes for Oxford City under the DtC which can be achieved without departing from the spatial strategy set out in Core Policy 3 of the LPP1 which is already delivering 4,500 homes in proximity to the City notwithstanding the recognition in para. 2.31 of the LPP2 that “... *it is also the case that, in reality, any of the homes allocated across the two sub-areas [Abingdon-on-Thames / Oxford Fringe Sub-Area and South East Vale Sub-Area] could contribute towards the [Oxford City’s] unmet needs ...*”.

Question 2.4 – Strategy for Meeting Unmet Need

- 3.1 As explained above for question 2.3, there is acknowledgement within the LPP2 (paras. 2.18 and 2.31), LPP2 evidence base (paras. 4.7 and 4.8 of Oct '17 Site Selection Topic Paper) and LPP1 Inspector's Report (para. 25) that the LPP1 and LPP2 will jointly deliver 2,200 new homes to assist Oxford City under the DtC and that this need could be delivered anywhere across the Abingdon-on-Thames / Oxford Fringe and South East Vale Sub-Areas.
- 3.2 The spatial strategy for delivering a proportion of Oxford City's unmet need is not considered to have been soundly applied within the LPP2 which demonstrably departs from the LPP1 spatial strategy and settlement hierarchy by proposing significant development in unsustainable locations justified by their geographic proximity to Oxford which as the LPP1 and LPP2 evidence base demonstrates, is not an overriding imperative given the number of new homes already allocated close to the City within the LPP1 and the ability for homes across the Abingdon-on-Thames / Oxford Fringe and South East Vale Sub-Areas to be attractive to those unable to live in Oxford.
- 3.3 The Inspector must consider whether, if there was no unmet housing need associated with Oxford City, the spatial strategy and distribution of development proposed within the LPP2 would be considered sound given the unsustainability of the settlements and range of adverse environmental impacts arising.

Question 2.5 – Exceptional Circumstances and Dalton Barracks

- 4.1 Para. 83 of the NPPF states that *"Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan"*. The LPP2 proposes to remove the Dalton Barracks site from the Green Belt as an 'exceptional circumstance' as it is *"... considered to constitute a major change in circumstances as the site was previously not considered available"* (para. 2.70).
- 4.2 There would appear to be three fundamental considerations in respect of whether 'exceptional circumstances' can be demonstrated to remove Dalton Barracks from the Green Belt as required by para. 83 of the NPPF:
 - (i) The Council acknowledge that the 1,200 new homes proposed at Dalton Barracks could be delivered on non-Green Belt land elsewhere in the VoWH and therefore there is no overriding need for new homes to be constructed on the Green Belt. The availability and unevidenced rejection of land to the West of Wantage adjacent to a sequentially preferable 'market town' and delivering strategic infrastructure in the WWLR safeguarded through the LPP1 is a clear example of this;
 - (ii) As demonstrated under Question 2.4 above, the Council and LPP1 Inspector have both recognised that circa 4,500 new homes allocated within the LPP1 are capable of addressing unmet need arising from Oxford City and that housing across both the Abingdon-on-Thames / Oxford Fringe and South East Vale Sub-Areas would be attractive to purchasers unable to access the Oxford housing market. The proximity of Dalton Barracks to Oxford City is not therefore considered to be an exceptional circumstance that justifies the removal of the site from the Green Belt;
 - (iii) The Green Belt Review Phases 1, 2 and 3 prepared to inform the LPP1 did not identify Dalton Barracks for release from the Green Belt. It can therefore be assumed that it was considered to contribute to one or more of the five NPPF Green Belt tests despite being

partly previously developed. If the position of the Council is that Dalton Barracks should not be kept permanently open, as per para. 85 of the NPPF, it should have been removed from the Green Belt alongside boundary review work associated with the LPP1.

- 4.3 It is not considered that exceptional circumstances can be demonstrated to justify the release of Dalton Barracks from the Green Belt. This is due to land being available outside the Green Belt capable of addressing unmet need arising from Oxford City as well as there being no overriding need for housing to be located in geographical proximity to the City given allocations made through the LPP1. The land also contributes to meeting Green Belt purposes, and was not proposed for release associated with extensive Green Belt assessment work associated with the LPP1.
- 4.4 The justification provided by the Council that the site comprises significant previously developed land that was not previously available for development does not bear scrutiny from an exceptional circumstances perspective as para. 89 of the NPPF allows for *“partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development”*.
- 4.5 We do not consider that the Council has fully explored the availability of land outside the Green Belt to accommodate housing, especially given that the Green Belt only covers a relatively small proportion of the VoWH being 40% of the Abingdon-on-Thames and Oxford Fringe Sub-Area. The VoWH Green Belt plays an integral role in preventing the urban sprawl of Oxford City and its amalgamation with settlements to the west and south. Its erosion should only be considered as a truly ‘exceptional circumstance’ which has not been satisfactorily demonstrated for the Dalton Barracks site, with the LPP2 being unsound as ‘inconsistent with national policy’. Para. 89 of the NPPF allows for the development of previously developed sites without their removal from the Green Belt.