

Vale of White Horse Local Plan 2031 Part 1

Examination Hearings

Examination Stage 2

Written Statement by Vale of White Horse District Council

in relation to:

Matter 8 – Strategy for the Abingdon-on-Thames and Oxford Fringe Sub Area (Policies CP8 – CP11 and CP14)

Version:
Dated:

FINAL
5th January 2016

Matter 8 - Strategy for the Abingdon-on-Thames and Oxford Fringe Sub Area (Policies CP8 – CP11 and CP14)

1. Introduction and Background

Overview

- 1.1 The Abingdon-on-Thames and Oxford Fringe Sub-Area lies in the north-eastern part of the district, it contains a large area of land within the Oxford Green Belt and is the second area of focus for development within the Vale after Science Vale.
- 1.2 Six strategic sites have been proposed within the Abingdon-on-Thames and Oxford Fringe Sub-Area, which account for approximately 15 % of the housing allocated in the Local Plan Part 1. These are split roughly 50:50 between the Market Town of Abingdon-on-Thames and four of the most sustainable Larger Villages, two of which are in close proximity to Abingdon itself.
- 1.3 Abingdon-on-Thames is the largest and most sustainable settlement within the district and is the focus of services for this Sub-Area. The Local Service Centre of Botley is also located within this Sub-Area, lies close to Oxford, is home to a campus of Oxford Brookes University and is an important local centre for retail and facilities.
- 1.4 The vision for this Sub-Area is that Abingdon-on-Thames will continue to function as an important service and employment centre within the district and that Botley will continue to function as a thriving community on the western edge of Oxford. The overarching priority will be to maintain the character and environment of the main settlements, villages and rural areas and by protecting the overarching purposes of the Oxford Green Belt¹.
- 1.5 Further details of the rationale behind the Council's Spatial Strategy is available in the Council's Matter 3 Written Statement: Spatial Strategy and Housing Supply Ring Fence² and Topic Paper 2: Spatial Strategy³.

Local Plan Chronology

- 1.6 The Local Plan has been informed by an iterative process of consultation, technical evidence and Sustainability Appraisal (SA). Important steps in shaping the proposals for housing within this Sub-Area were:
 - The Council first allocated housing within this Sub-Area within the *Preferred Options Consultation* published in 2009⁴. This proposed 1,500 homes to the south of Abingdon-on-Thames and made provision for a new south Abingdon bypass. This allocation responded positively to the housing target published in the South East Plan and a recognition that

¹ EIP Library Ref No: DLP01 - Draft Local Plan 2031 Part 1: Strategic Sites and Policies. Page 51.

² EIP Library REF NO: VWS03 - Local Plan 2031 Part 1: Examination Stage 1 – Matter 3 Spatial Strategy and Housing Supply Ring Fence

³ EIP Library Ref No: TOP02 - Topic Paper 2: Spatial Strategy

⁴ EIP Library Ref No: OCD07 – Core Strategy Preferred Options Consultation

Abingdon was a sustainable location for development with the highest level of services and facilities in the district;

- The proposed development to the south of Abingdon-on-Thames was then reviewed by the Council following the *Preferred Options Consultation* and subsequently removed from the Plan through the *Additional Consultation* published in January 2010. Its removal was due to the cost of the south Abingdon bypass being greater than could be funded by development alone and no external funding being available. Essentially, the infrastructure required to facilitate its development was undeliverable;
- The Draft Local Plan Consultation published in February 2013 therefore, did not contain any strategic site proposals within the Abingdon-on-Thames Sub-Area, but did propose the safeguarding of land for the possible future provision of a south Abingdon bypass;
- The Oxfordshire Strategic Housing Market Assessment (SHMA) was published in 2014. This identified an Objectively Assessed Need housing requirement of 20,560 homes for the Vale, an increase of some 55% (7000+ homes – see *Housing Delivery Update*⁵);
- The newly identified OAN was informed by new economic projections for Oxfordshire, responding to the new Government's strong growth agenda and fully reflected on the Oxfordshire Strategic Economic Plan, which stated that 'accelerating housing delivery' was 'fundamental' to support innovation led growth⁶ in the area;
- In light of this, the Council identified a series of additional strategic site allocations for inclusion within the Local Plan;
- The *Housing Delivery Update* consultation, published in February 2014, proposed ten strategic development sites within this Sub-Area (South Cumnor (200); East Wootton (200); North West Abingdon (200); North Abingdon (410); South Kennington (270); North Radley (200); North West Radley (240); South Marcham (200); South Drayton (200); East Sutton Courtenay (220));
- The *Housing Delivery Update* was informed, in part, by a Green Belt Review that identified parcels of land no longer meeting the purposes of the Green Belt as defined by the NPPF⁷. This informed the identification of reasonable and realistic alternative site options for detailed testing;
- Following the *Housing Delivery Update* consultation, which ended in May 2014, the Council considered and reviewed its proposed sites package for all sub-areas, in response to both the consultation responses received, ongoing technical evidence, Sustainability Appraisal (SA), and a review of the housing land supply position. Further detailed evidence (for example a Landscape and Visual Impact Assessment) was also commissioned to examine the potential for additional development to the north of Abingdon, and;
- The Submission version of the Local Plan proposes four strategic development allocations within this Sub-Area. These are for North West Abingdon (200); North Abingdon (800); South of Kennington (270); and North West Radley (240). The reasons these sites were chosen as

⁵ EIP Library Ref No: PLP01.1 - Housing Delivery Update

⁶ EIP Library Ref No: ECO010 - Oxfordshire Strategic Economic Plan – Driving Economic Growth through Innovation

⁷ EIP Library Ref No: LNP02 - National Planning Policy Framework. Paragraph 80.

strategic allocations in the Plan are explained in Topic Paper 3: Strategic Sites Selection⁸.

- 1.7 This statement addresses the questions raised by the Inspector in relation to Matter 8: Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area and how the policies meet the tests of soundness.
- 1.8 This paper does not specifically revisit matters relating to Green Belt release as this issue has been dealt with under Matter 5, nor does it concentrate in detail on the associated infrastructure matters, except where critical to the understanding of the Sub-Area, as this is dealt with under Matter 7.
- 1.9 The following evidence base references provide support the for the Council's strategy:
- Core Policy 8 provides the overarching priorities and development need in the Sub Area, supported by Core Policy 6;
 - The Site Development Templates, included in the Local Plan Part 1 Appendices, for each of the strategic sites allocated by the Local Plan, set out the requirements for new development and the necessary infrastructure requirements to ensure a sustainable development is delivered in accordance with the NPPF⁹;
 - The Infrastructure Delivery Plan (IDP) ¹⁰ identifies the strategic infrastructure items required in the Sub-Area to support and enable development. This includes the timing of delivery and how infrastructure is intended to be funded and delivered;
 - The Sustainability Appraisal¹¹;
 - Habitats Regulations Assessment¹²;
 - Landscape Capacity Study¹³;
 - Landscape and Visual Impact Assessment for North Abingdon Land to the East of Oxford Road¹⁴
 - Employment Land Review¹⁵ and Addendum¹⁶;
 - Evaluation of Transport Impacts Study¹⁷;
 - Town and Facilities Study¹⁸;
 - Strategic Housing Land Availability Assessment¹⁹ and associated viability assessment²⁰;
 - Historic Character Assessment²¹; and
 - Local Plan Viability Study²².

⁸ EIP Library Ref No: TOP03 - Topic Paper 3 Strategic Sites Selection

⁹ EIP Library Ref No: DLP02 – Local Plan Part 1 Appendix 1, pages 7 to 20

¹⁰ EIP Library Ref No: DLP07 – Infrastructure Delivery Plan March 2015.

¹¹ EIP Library Ref No: DLP04 – Submission Sustainability Appraisal March 2015

¹² EIP Library Ref No: DLP06 – Submission Habitats Regulations Assessment March 2015

¹³ EIP Library Ref No: NAT04.5-4.12 – Landscape Capacity Study

¹⁴ EIP Library References NAT05, NAT 05.1, NAT 05.2 – Landscape and Visual Impact Assessment for North Abingdon Land to the East of Oxford Road

¹⁵ EIP Library Ref No: ECO01 – Employment Land Review

¹⁶ EIP Library Ref No: ECO01.2 – Addendum to the Employment Land Review

¹⁷ EIP Library Ref No: TRA02 – Evaluation of Transport Impacts Study

¹⁸ EIP Library Ref No: COM04 – Town and Villages Facilities Study

¹⁹ EIP Library Ref No: HOU09 – Strategic Housing Land Availability Assessment

²⁰ EIP Library Ref No: HOU2.9a-e – Strategic Housing Land Availability Assessment Viability Assessment

²¹ EIP Library Ref No: BHE01 – Historic Character Assessment

²² EIP Library Ref No: INF01 – Local Plan Viability Study

Question 8.1

Other than in connection with Green Belt issues (considered in Matter 5) are the Strategic Housing Allocations listed in Policy CP8 soundly based and deliverable?

- a) North of Abingdon-on-Thames (site 2)
- b) North-West of Abingdon-on-Thames (site 1)
- c) North-West of Radley (site 4)
- d) South of Kennington (site 3)
- e) South of East Hanney (site 6)
- f) East of Kingston Bagpuize with Southmoor (site 7)

2. The Council's Response to Question 8.1

- 2.1 The Council considers that the Strategic Site Allocations listed in Core Policy CP8 are soundly based and deliverable.
- 2.2 The Council has followed a comprehensive and iterative approach to site selection. Potential site options have been identified and assessed in detail in accordance with a comprehensive process (summarised by **Table 8.1**; see below). This process included five main stages and started with an assessment of potential site options across the whole district. The options were filtered in accordance with the methodology and short listed sites were tested in more detail, informed by a wide range of evidence and Sustainability Appraisal (SA). A detailed summary of the site selection process is provided by Topic Paper 3: Strategic Sites Selection²³.
- 2.3 Plan preparation has also been iterative and there have been seven key plan-making stages from 2007 to 2014 (summarised by **Table 8.2**; see below). At each plan-making stage, different site options were considered. The number of site options being considered increased following the revocation of the South East Plan and the subsequent publication of the Oxfordshire Strategic Housing Market Assessment (SHMA) in 2014. The new housing target for the Vale increased by 55% (7000+ homes) and hence the number of strategic site allocations included within the plan increased from five (Draft Local Plan Feb 2013) to over twenty (Pre-Submission Local Plan Feb 2014).
- 2.4 As discussed in the Introduction to this Statement, the Sub-Area contains a large area of the Oxford Green Belt (Matter 5). As part of the Local Plan preparation, the District's Green Belt has been reviewed, in accordance with the guidance in Section 9 of the NPPF. A number of areas of land were identified for release from the Green Belt where the Council considered that the land no longer meets the purposes of the Green Belt. Parcels of land identified for release from the Green Belt were then included in the assessment of sites and several were considered suitable for strategic allocation by the Council in the Local Plan. No further suitable sites have been identified at Abingdon-on-Thames or Botley, principally due to Green Belt, landscape, flooding constraints and a simple lack of available land. For

²³ EIP Library Ref No: TOP03 – Topic Paper 3 Strategic Sites Selection

this reason, highly sustainable and deliverable sites have also been proposed within four sustainable Larger Villages.

- 2.5 The proposed allocations in this Sub-Area all have good access to a range of services and facilities and public transport. A summary of the key advantages for including the strategic housing allocations selected in the Local Plan for this Sub-Area is set out in **Appendix 1**.
- 2.6 The following section addresses how in relation to this matter the Local Plan accords with the tests of Soundness.

Tests of Soundness

1. Positively prepared

- 2.7 In accordance with the National Planning Policy Framework (NPPF), the plan is based on a strategy which seeks to fully meet the objectively assessed development and infrastructure requirements and is consistent with achieving sustainable development²⁴. Unmet need is addressed through Core Policy CP2²⁵.

2. Justified

- 2.8 In accordance with the NPPF²⁶, the strategic site allocations have been identified through a comprehensive site selection process, informed by comprehensive evidence and Sustainability Appraisal (SA) and testing of reasonable alternatives. A large number of sites have been assessed with over one hundred sites being considered overall and fifty five sites short-listed for detailed testing.
- 2.9 The preferred sites were selected, in addition to being informed by evidence and SA, to fit with the Council's Spatial Strategy and to provide support for the Science Vale focus for growth, in accordance with the Oxfordshire Strategic Economic Plan (SEP), and the main settlements in the district (Stage 3: **Table 8.1**).

3. Effective

- 2.10 The strategic sites identified by the Council are all demonstrably deliverable over the plan period, with documented evidence to this effect from the Site Promoters (Hearing Statement: Matter 11 - Five Year Housing Land Supply²⁷) and being informed by independent assessment.
- 2.11 The study '*Meeting the Objectively Assessed Need for Housing*', published in October 2014 considered the Council's ability to deliver the heightened level of Objectively Assessed Need for housing in the District which was identified in the SHMA. The study concludes that with the 'wide range of sites in a range of locations, the Council will be maximising the likelihood of

²⁴ EIP Library Ref No: LNP02 - National Planning Policy Framework. Para 182

²⁵ EIP Library Ref No: VWS01 – Local Plan 2031 Part 1: Examination Stage 1: Hearing Statement 1 Duty to Cooperate and other Legal Requirements

²⁶ EIP Library Ref No: LNP02 – National Planning Policy Framework. Para 182.

²⁷ EIP Library Ref No: VWS11 – Local Plan 2031 Part1: Examination Stage 2: Hearing Statement Matter 11 Five Year Housing Land Supply

delivery'²⁸. In other words, the inclusion within the Local Plan of a mix of larger and smaller strategic sites, at Market Towns, Local Service Centres and at Larger Villages, all help to make a valuable contribution to 'delivery' and thus form a credible approach to housing distribution.

- 2.12 Joint working and our commitments under the Duty-to-Cooperate have been discussed under the Council's Matter 1 Written Statement: Duty-to-cooperate and other Legal Requirements²⁹.

4. Consistent with national policy

- 2.13 The Council's strategy and selection of strategic sites are considered to fully accord with the NPPF and will enable the delivery of a sustainable pattern of development for the area. The following paragraphs of the NPPF are relevant.

- 2.14 Paragraph 17 of the NPPF:

- "Takes account of the different roles and character of different areas..."
"Promotes mixed use developments, and encourage multiple benefits from land use..."
"Actively manages patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made sustainable..."³⁰.

- 2.15 Four of the proposed strategic housing allocation sites identified within this sub-area are located at or close to Abingdon, two being located very close to Radley Railway Station and all are accessible to existing frequent public transport routes. The other two sites at Kingston Bagpuize with Southmoor and East Hanney are also well located on existing public transport routes, particularly to Abingdon and Oxford. All sites are considered to have good access to the services and facilities provided in Abingdon-on-Thames and Botley and the city of Oxford.

- 2.16 Paragraph 47 of the NPPF:

- "Identify a supply of specific, deliverable* sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15"³¹
Footnote*: To be considered deliverable, site should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

- 2.17 In line with the Council's approach, five of the six strategic sites proposed within this Sub-Area are all relatively small (around 200 dwellings) in size and thus make a strong contribution to housing delivery early in the plan period and are fully in accordance with the NPPF in this regard.

²⁸ EIP Library Ref: HOU03 – HDH Planning & Development Ltd (2004) Meeting Objectively Assessed Need for Housing

²⁹ EIP Library Ref No: VWS01 – Local Plan 2031 Part 1: Examination Stage 1: Duty to Cooperate and Other Legal Requirements

³⁰ EIP Library Ref: LNP02 – National Planning Policy Framework. Para 17.

³¹ EIP Library Ref: LNP02 – National Planning Policy Framework. Para 47.

2.18 Paragraph 55 of the NPPF

- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities...”³²

2.19 Four of the proposed strategic allocations in this Sub-Area are located at sustainable larger villages, where development will assist with enhancing village vitality and contribute towards improved facilities, including for example public transport.

2.20 Paragraph 157 of the NPPF

- “Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”³³.

2.21 The ‘Site Development Templates’, which form Appendix A of the Local Plan 2031: Part 1 identify key objectives for each site and set out clear requirements for the future development of each site to take into account.

2.22 Of particular significance to the Sub-Area is the upgrade to the Lodge Hill Interchange of the A34, where south facing slips will be added to allow full north/south access at this junction. This is identified as a priority in the adopted Oxford Transport Strategy³⁴ and will deliver a very important improvement to the highway network around Abingdon, which is known to be constrained³⁵. Four of the proposed strategic allocations in this Sub-Area are all located close to this junction and will make a financial contribution to help facilitate the delivery of this critical infrastructure.

³² EIP Library Ref No: LNP02 – National Planning Policy Framework. Para 55.

³³ EIP Library Ref No: LNP02 – National Planning Policy Framework. Para 157.

³⁴ EIP Library Ref No: TRA10 – Oxfordshire Local Transport Plan 4.

³⁵ EIP Library Ref No: TRA02 – Evaluation of Transport Impacts Study to inform the Vale of White Horse Local Plan 2031: Part 1 Strategic Sites and Policies: Final Report

Table 8.1: Site Selection Methodology (used by the Council 2013 onwards)³⁶

Stage	Description of Process
Stage 1	Identification of potential sites <ul style="list-style-type: none"> • Informed by Strategic Housing Land Availability Assessment (SHLAA) • Investigation of land around main settlements and at employment locations
Stage 2	Initial Site Filters <ul style="list-style-type: none"> • Site size threshold (200 homes) • Exclusion of sites with planning status
Stage 3	Identification of key constraints/ opportunities and further site sift <ul style="list-style-type: none"> • Fit with spatial strategy, supporting Science Vale and main settlements • Constraints (AONB, Flood Zone, Green Belt, and others) • Level of facilities and services available at site locations
Stage 4	Detailed evidence testing, informal consultation and sustainability appraisal <ul style="list-style-type: none"> • Landscape Capacity Study • Transport Modelling • Viability Assessment • Historic Landscape Character Assessment • Green Belt Review • Informal consultation with infrastructure providers and key stakeholders • Sustainability Appraisal (SA)
Stage 5	Identification of preferred sites <ul style="list-style-type: none"> • To meet objectively assessed housing need in the Oxfordshire Strategic Housing Market Assessment • Sites which can deliver homes in the first five years identified to contribute towards the five year housing land supply • Preferred sites included in February 2014 Local Plan Part 1 Consultation Document.

Table 8.2: Summary of Local Plan Stages³⁷

Date	Local Plan Stage	Housing Target
Nov 2007	Issues and Options	South East Plan (13, 294 dwellings)
Jan 2009	Preferred Options	
Jan 2010	Additional Consultation	
2011 - 2012	Internal Review	
Feb 2013	Draft Local Plan	
Feb 2014	Housing Delivery Update	Oxfordshire Strategic Housing Market Assessment (20,560 dwellings)

³⁶ EIP Library Ref No: TOP03 - Topic Paper 3: Strategic Site Selection

³⁷ EIP Library Ref No: TOP03 - Topic Paper 3: Strategic Site Selection

Question 8.2

Are there other sites that would more appropriately meet the identified need for new housing?

3. The Council's Response to Question 8.2

- 3.1 The Council considers that none of the alternative sites would more appropriately meet the identified need for new housing.
- 3.2 The Council's approach to site selection has been described under Question 8.1 (see above). It has involved the comprehensive assessment of a wide range of sites across the whole district, informed by detailed evidence and Sustainability Appraisal (SA). In total, fifty-five sites were short-listed for testing in detail, twenty within the Abingdon and Oxford Fringe Sub-Area. A detailed summary of the site assessment of these sites is set out in two documents: Housing Delivery Update Supporting Paper: Appendix 5 – Site Information Tables (February 2014)³⁸ and Topic Paper 3: Strategic Sites Selection (November 2014)³⁹.
- 3.3 A brief summary of the reasons why the alternative sites were not identified as preferred, within the Abingdon and Oxford Fringe Sub-Area, is included within **Appendix 2**. The alternative sites were not selected as preferred for a number of reasons; some are simply not suitable for development, others are too small to be considered as 'strategic' sites for inclusion within the Local Plan 2031: Part 1.

³⁸ **EIP Library Ref No: PLP02.1** - Housing Delivery Update Supporting Paper: Appendix 5 – Site Information Tables

³⁹ **EIP Library Ref No: TOP03** - Topic Paper 3: Strategic Sites Selection

Question 8.3

Are the identified and safeguarded Employment sites listed in Policy CP8 soundly based and deliverable? Are there other sites that would more appropriately meet the identified need for employment land?

4. The Council's Response to Question 8.3

- 4.1 The Local Plan 2031 Part 1 supports strong economic growth, principally focused on the South East Vale Sub-Area, and the Science Vale Locality. This accords fully with the Oxfordshire Strategic Economic Plan (SEP) and its objective to support innovation-led growth, within the Oxfordshire Knowledge Spine, and the UK Government's agenda for growth.
- 4.2 The Local Plan is supported by robust evidence, including the Employment Land Review 2013 Update and subsequent 2014 Addendum, which updates the employment needs of the district in line with the outputs of the Strategic Housing Market Assessment (SHMA) for Oxfordshire and the Economic Forecasting report that informed it.
- 4.3 The evidence demonstrates there is sufficient vacant or developable employment land across the district to accommodate the predicted jobs growth for the plan period. It also recommends that strategic employment sites are protected from alternative uses.
- 4.4 As has been discussed within the introduction to this statement, the Abingdon-on-Thames and Oxford Fringe Sub-Area is the second key area of focus for new development and growth after the South East Vale, and around 15 % of the proposed strategic housing is proposed by the Local Plan to be allocated to this area. The Sub-Area already has strong employment sectors, both on designated business parks, and also within the education and retail sectors. There is for example a campus of Oxford Brookes University at Botley; there are already strong retail centres and retail parks in Abingdon-on-Thames and Botley as well as proposals for new or redeveloped schemes in these locations (Matters 8.4 a and c).
- 4.5 The focus for future employment within this Sub-Area is the safeguarding of existing strategic sites, in accordance with Core Policies CP6 and CP15⁴⁰.
- 4.6 A key issue arising from representations made to the Local Plan 2031 Part 1 is the scale of employment growth envisaged for the district overall. Several representations suggest that a large amount of employment land is located within the South East Vale Sub-Area rather than for the Abingdon-on-Thames and Oxford Fringe Sub-Area. This is important to ensure the plan supports the Oxfordshire Strategic Economic Plan and wider agenda for growth. However, there is already strong employment provision within this Sub-Area. This matter was also discussed at length in Stage 1 of the Hearing Sessions,

⁴⁰ EIP Library Ref No: ECO01 - Employment Land Review Update 2013. Page.77
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principally as part of Matter 2 (Question 2.3) and the Inspector is requested to review the Council's written response to this matter.

- 4.7 In terms of other alternative sites, the Council considers that no clear or persuasive evidence has been submitted to the Council to demonstrate or promote any alternative sites specifically for strategic employment use within this Sub-Area.

Question 8.4

Are the policies relating to the following matters soundly based:

- a) Harcourt Hill Campus (CP9)**
- b) Abingdon Shopping Centre and the Charter (CP10)**
- c) Botley Central Area (CP11)**
- d) Upper Thames Reservoir (CP14)**

5. The Council's Response to Question 8.4

CP9 – Harcourt Hill Campus (Oxford Brookes University)

- 5.1 Oxford Brookes University wishes to improve the quality of its Harcourt Hill Campus and is currently reviewing its future role. The Local Plan includes a positive policy, CP9 to facilitate appropriate development on the site, which gives consideration to its Green Belt setting and urban fringe context, the importance of supporting sustainable development, and in particular the need for any future development to make the most of opportunities for sustainable modes of transport.
- 5.2 Policy CP9 also commits the Council to working proactively with key stakeholders, including the University, Oxfordshire County Council and local residents to develop a masterplan for the campus site that meets the University's long-term business and educational needs, in a manner that respects the sensitivities of the site's location in the Oxford Green Belt.
- 5.3 Whilst there have been few consultation responses to this policy, dialogue with the University has been ongoing. The Council is committed to support for the University, whilst seeking to balance the sensitivity of the site and is confident the policy, as currently worded, strikes an appropriate balance and being in accordance with national policy. This is reflected in the policy included in the Local Plan.

CP10 – Abbey Shopping centre and the Charter

- 5.4 Redevelopment of the Abbey Shopping Centre and the Charter Area (the area which adjoins Bury Street Precinct) in Abingdon-on-Thames has been a long standing Council priority. The first phase of redevelopment at the Abbey Shopping Centre was completed in 2012, has been well received locally and has helped to improve the quality and use of the retail centre. Progress of the second stage, as supported by Policy CP10, has been slower than originally envisaged due to the economic downturn in recent years, but remains fundamentally important to the local community and the Council as it seeks to strengthen the retail core of the town centre.
- 5.5 Redevelopment of the Charter Area is fundamentally important to support the future retail needs of Abingdon-on-Thames and the continued vitality and viability of a thriving town centre. The most up-to-date retail study identifies an increased need for provision of food and non-food retail floorspace (of 13,716 sq.m before commitments and proposals) to meet the planned population growth in Abingdon-on-Thames up to 2031. The opportunity

presented by the Charter Area land for additional retail uses will help to meet this identified need in accordance with the NPPF.

- 5.6 Only five representations were made to policy CP10 through consultation and none objected to its principle. One consultation response stated that additional land was needed for retail use in Abingdon-on-Thames. Guidance has been provided in the Retail and Town Centre Study Addendum on potential alternative sites in Abingdon-on-Thames, including at the proposed allocation north of the town, and considers that core policy CP32: Retail and Other Main Town Centre Uses to be sufficient to address any further retail demand.

CP 11 – Botley Centre Area

- 5.7 The West Way Shopping Centre is a 1960's part covered shopping precinct that forms the main shopping area for Botley. This, along with its surrounding buildings have served Botley well over the years, but the West Way Centre is now in need of refurbishment, if Botley is to continue to fulfil its full potential as a Local Service Centre during the plan period and maintain and enhance its viability and vitality.
- 5.8 Some local community opposition has been forthcoming in response to a recent planning application for this site, principally as it was felt the proposal did not sufficiently protect the historic buildings on site (Elms Parade) or make sufficient consideration to the site's role within the landscape setting of Oxford City (a World Heritage Site). It is anticipated that a Planning Application will be submitted for comprehensive development of this site early in 2016.
- 5.9 The Council has also progressed a Supplementary Planning Document (SPD) for Central Botley to complement its Design Guide (adopted as SPD in 2015) and help improve the quality of any future proposals for the site. The SPD accords with the adopted Local Plan 2011 and has been prepared in addition to updating and improving the wording of CP 11 within the submitted Local Plan. Once the Local Plan 2031 Part 1 is adopted, the SPD will be updated.
- 5.10 The Council remains fully committed to working with the community and local stakeholders in Botley to ensure any redevelopment is appropriate and optimises its role as an important local service centre close to Oxford. The Council is also confident that the objections to the policy have been adequately addressed through the preparation of the SPD and that these are now reflected in the final policy wording of CP11 included in the Local Plan.

CP14: Upper Thames Reservoir

- 5.11 The Council believes that CP14: Upper Thames Reservoir is soundly based and consistent with national policy.
- 5.12 Thames Water's Water Resources Management Plan 2015–2050 (WRMP)⁴¹ sets out how it proposes to maintain an appropriate balance between the demands for water in their supply area against available water supplies. Thames Water have stated that their preferred approach to address this matter is to develop a storage reservoir to the south west of Abingdon. A final decision on whether a reservoir will be required will be set out in the next iteration of the Water Resources Management Plan to be published in 2019.
- 5.13 The Council has worked closely with Thames Water in recognising the need to safeguard local water supplies. Core Policy 14 proposes to safeguard land between Steventon, Drayton and East Hanney⁴², to facilitate the delivery of the storage reservoir by the water company.
- 5.14 Both Swindon Borough Council and Oxford City Council have supported this policy through their formal response to Local Plan consultations stating the reservoir is important so as not to prejudice the long-term growth of Swindon⁴³ and ensure the provision of infrastructure relating to water supply for the wider Oxford area.⁴⁴
- 5.15 Policy CP14 is considered to be consistent with the tests of soundness:
- The policy is consistent with the NPPF, in that it requires local planning authorities to identify suitable sites for water and wastewater and to ensure timely delivery to support sustainable development;
 - The policy has been tested through an iterative Sustainability Appraisal (SA) process⁴⁵, a robust evidence base and stages of public consultation⁴⁶, and;
 - The policy sets out criteria to include benefits that the scheme should deliver. The SA report has concluded that there are no reasonable alternative policy options to consider.
- 5.16 Thames Water has suggested revising the wording to policy CP14 (Appendix 3). The Council is content to agree with this suggestion as it will provide helpful clarity.

⁴¹ **EIP Library Ref No: WWF09** - Thames Water Resources Management Plan 2015 – 2050

⁴² **EIP Library Ref No: DLP01** – Local Plan 2031 Part 1: Strategic Sites and Policies. Appendix F

⁴³ Reference to Swindon Borough Council representation, available at:

http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=494519967&CODE=0C9F4E514A56D046F4E47D309845EA03

⁴⁴ Reference to Oxford City Council representation, available at:

http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=494516741&CODE=8463B462EBFEEBA12AEBA482C29FA06

⁴⁵ **EIP Library Ref: DLP04** – Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part One.

⁴⁶ **EIP Library Ref: DLP09** – Regulation 22 Consultation Statement.

6. Summary of how the Policies and Proposals in the Sub-Area meet the 'tests of soundness'

6.1 *Positively Prepared*

In accordance with the NPPF and PPG, the Abingdon-on-Thames and Oxford Fringe Sub-Area is based on a strategy that seeks to help meet the full objectively assessed development and infrastructure requirements consistent with achieving sustainable development⁴⁷. The evidence base studies and the Sustainability Appraisal process have ensured the policy is positively prepared through ensuring the most sustainable strategy and allocations are included within the Plan with enhancement and mitigation measures being incorporated where required.

6.2 *Justified*

In accordance with the NPPF⁴⁸ and PPG, a comprehensive site selection process has been undertaken, informed by comprehensive evidence and the Sustainability Appraisal which has resulted in robust testing of reasonable alternatives. This has ensured the most appropriate, sustainable and justified strategy is proposed in the Local Plan.

6.3 *Effective*

In accordance with the NPPF⁴⁹ and the PPG, the Abingdon-on-Thames and Oxford Fringe Sub-Area strategy is considered deliverable over the plan period, which is demonstrated within the SHLAA and associated viability assessment, the Meeting the Objectively Assessed Need for Housing Study, and Matter 11 Statement Appendices. The Council is committed to joint working with key stakeholders and site promoters to enable the positive delivery of the strategy. The Site Development templates identify key objectives for each site and set out the key delivery requirements for each site allocated in this part of the Local Plan.

6.4 *Consistent with National Policy*

The Abingdon-on-Thames and Oxford Fringe Sub-Area strategy accords with NPPF⁵⁰ and the PPG and is considered to be soundly based.

⁴⁷ EIP Library Ref No: LNP02 National Planning Policy Framework. Para 182.

⁴⁸ EIP Library Ref No: LNP02 National Planning Policy Framework. Para 182.

⁴⁹ EIP Library Ref No: LNP02 National Planning Policy Framework. Para 182.

⁵⁰ EIP Library Ref No: LNP02 National Planning Policy Framework. Para 182.

7. Conclusion

- 7.1 The Council considers that in respect of this matter, the Local Plan meets the tests of soundness set out in the NPPF subject to minor modifications it sets out in **Appendix 3** to this Written Statement.

APPENDIX 1: Summary of why sites were selected as preferred

Site No*	Site Name	Reason for selecting as preferred site
1 (1) TPS004	North Abingdon-on-Thames	<p>Overview: Highly sustainable location adjacent to the Vale's largest settlement: allocated for around 800 homes.</p> <p>SA: Likely significant positive effects against four objectives. No likely significant negative effects.</p> <p>Transport: The site is well served by public transport and is well located to access employment, services and facilities located in Abingdon-on-Thames. The Evaluated Transport Impacts Study demonstrates that an upgrade to the A34 Junction at Lodge Hill will have a positive impact overall and help address wider traffic network concerns. Development at this site helps to facilitate delivery of this upgrade; now a priority in the adopted Oxford Transport Strategy.</p> <p>Other Constraints: Site is located within Oxford Green Belt. However, development is considered suitable with limited harmful impact on the five Green Belt Purposes. Landscape Capacity Study concludes that parts of site are suitable for development. Site extended to east following detailed Landscape and Visual Impact Study concluded that additional development could be accommodated without harm to the landscape.</p> <p>No other significant constraints or barriers to development on this site. Site is deliverable, as documented by the site promoters.</p>
2 (42) TPS005	North West Abingdon-on-Thames	<p>Overview: Highly sustainable location adjacent to Vale's largest settlement: allocated for around 200 homes.</p> <p>SA: Likely significant positive effects against three objectives. No likely significant negative effects.</p> <p>Transport: The site is well served by public transport and is well located to access employment, services and facilities located in Abingdon-on-Thames. The Evaluated Transport Impacts Study demonstrates that an upgrade to the A34 Junction at Lodge Hill will have a positive impact overall and help address wider traffic network concerns. Development at this site helps to facilitate delivery of this upgrade; now a priority in the adopted Oxford Transport Strategy.</p> <p>Other Constraints: The Green Belt Review indicates that the site can be developed without affecting the integrity of the Oxford Green Belt; the land is contained and influenced by the A34. The Landscape Capacity</p>

Site No*	Site Name	Reason for selecting as preferred site
		<p>Study concludes that the site is suitable for development on landscape and visual impact grounds.</p> <p>No other significant constraints or barriers to development on this site (ecology, air quality, noise and flooding issues all easily mitigated). Site is deliverable, as documented by the site promoters.</p>
3 (25) TPS064	South Kennington	<p>Overview: Highly sustainable location adjacent to the one of the Vale's most sustainable larger villages: allocated for around 270 homes.</p> <p>SA: No likely significant effects identified.</p> <p>Transport: The site is well served by public transport, with opportunities for increased usage and is well located to access employment, services and facilities. The Evaluated Transport Impacts Study demonstrates that an upgrade to the A34 Junction at Lodge Hill will have a positive impact overall and help address wider traffic network concerns. Development at this site helps to facilitate delivery of this upgrade; now a priority in the adopted Oxford Transport Strategy.</p> <p>Other Constraints: The Green Belt Review indicates that the site could be developed without affecting the integrity of the Oxford Green Belt due to its containment within the existing settlement. The Landscape Capacity Study concludes that the area of site proposed for allocation is suitable for development.</p> <p>No other significant constraints or barriers to development on this site. Site is deliverable, as documented by the site promoters.</p>
4 (28) TPS077	North West Radley	<p>Overview: Highly sustainable location adjacent to the one of the Vale's most sustainable larger villages: allocated for around 240 homes.</p> <p>SA: No likely significant effects identified.</p> <p>Transport: The site is well served by public transport including a railway station, with opportunities for increased usage and is well located to access employment, services and facilities. The Evaluated Transport Impacts Study demonstrates that an upgrade to the A34 Junction at Lodge Hill will have a positive impact overall and help address wider traffic network concerns. Development at this site helps to facilitate delivery of this upgrade; now a priority in the adopted Oxford Transport Strategy.</p>

Site No*	Site Name	Reason for selecting as preferred site
		<p>Other Constraints: The Green Belt Review indicates that the site could be developed without affecting the integrity of the Oxford Green Belt due to its containment within the existing settlement. The Landscape Capacity Study concludes that the area of site proposed for allocation is suitable for development.</p> <p>No other significant constraints or barriers to development on this site. Site is deliverable, as documented by the site promoters.</p>
6 (55) TPS038	South of East Hanney	<p>Overview: Highly sustainable location adjacent to the one of the Vale's most sustainable larger villages: allocated for around 200 homes.</p> <p>SA: Two likely significant negative effects were identified.</p> <p>Transport: The site is well served by public transport with good accessibility to Abingdon-on-Thames and Wantage/ Grove.</p> <p>Other Constraints: There are some minor constraints associated with this site (proximity to Letcombe Brook habitat corridor, landscape impact, proximity to Flood Zones 2 and 3), but they do not restrict development and can be mitigated successfully, with inclusion of a suitable buffer and new planting.</p> <p>There are no significant barriers to development on this site and the site is deliverable, as documented by the site promoters.</p>
7 (48) TPS065	East of Kingston Bagpuize with Southmoor	<p>Overview: Highly sustainable location adjacent to the one of the Vale's most sustainable larger villages: allocated for around 280 homes.</p> <p>SA: One likely significant negative effect was identified.</p> <p>Transport: There are capacity and performance considerations associated with the A420 corridor. However, the site is located within easy walking distance of bus stops on route 66 from Swindon to Oxford. There is an opportunity to enhance this service.</p> <p>Other Constraints: There are some minor constraints associated with this site (proximity to Conservation Area, proximity to site that contains Great Crested Newts, potential for archaeological interest), but they do not restrict development and can be mitigated successfully.</p>

Site No*	Site Name	Reason for selecting as preferred site
		There are no significant barriers to development on this site and the site is deliverable, as documented by the site promoters.

* Numbers relate to Site Numbers as set out in Local Plan 2031 Part 1 as submitted.

() Numbers in Brackets relate to Site Information Tables for short-listed sites set out in: Housing Delivery Update Supporting Paper: Appendix 5 (Feb 2014); and Topic Paper 3: Strategic Sites Selection (Nov 2014).

TPS (Topic Paper Site) Numbers relate to tested sites as set out in Appendix A: Topic Paper 3: Strategic Sites Selection (Nov 2014).

Appendix 2: Summary of why alternative sites were not selected as preferred

Site No*	Site Name	Reason for not selecting as preferred site
(2) TPS006	South Abingdon	Severely restricted by transport issues. Issues can only be addressed through the provision of a southern by-pass for Abingdon-on-Thames. At present, there is no identified funding for a by-pass. A by-pass could not be funded solely by development on this site.
(3) TPS016	South West Botley	Development on this site would erode the open gap between Botley and Cumnor and would cause harm to the Oxford Green Belt. The Landscape Capacity Study concluded that no part of the site is suitable for development.
(20) TPS027	North West Drayton	The highway network in Drayton is close to capacity without additional growth and development may lead to worsening conditions. There are particular problems accessing Abingdon-on-Thames from the south and Didcot from the north. Development greater than 200 homes in Drayton is unlikely to be sustainable without delivery of a southern by-pass for Abingdon-on-Thames for which no funding is currently identified. South Drayton site preferred.
(21) TPS029	South Drayton	This site was identified as a preferred site in the Housing Delivery Update (Feb 14), but removed following consultation due to the progression of a Neighbourhood Plan for Drayton. Part of the site has been allocated in the adopted Drayton Neighbourhood Plan.
(22) TPS023	South Cumnor	This site was identified as a preferred site in the Housing Delivery Update (Feb 14), but removed following consultation due to landscape factors. Whilst considered sustainable, the site is not able to accommodate more than 200 dwellings hence not able to accommodate strategic scale development.
(27) TPS070	South Marcham	This site was identified as a preferred site in the Housing Delivery Update (Feb 14), but removed following consultation due to landscape constraints. Whilst considered sustainable, the site is not able to accommodate more than 200 dwellings hence not able to accommodate strategic scale development
(29) TPS076	North Radley	This site was identified as a preferred site in the Housing Delivery Update (Feb 14) against the findings of the Green Belt Review. The site was removed from the plan following consultation to reduce harm to the Oxford Green Belt and to landscape.

Site No*	Site Name	Reason for not selecting as preferred site
(36) TPS119	South Wootton	Development on the southern part of the site would have an impact on flight safety at Abingdon Airfield, and hence would not be appropriate (based on advice from the MOD). The site is located 250m from the Cothill Fen SAC. The East Wootton site is a preferred location for development as it is located further from Cothill Fen SAC.
(37) TPS118	North Wootton	There are significant surface water flooding issues on Cumnor Road, which development could exacerbate. The site is located 350m from the Cothill Fen SAC. The East Wootton site is a preferred location for development as it is located further from Cothill Fen SAC.
(41) TPS099	Steventon Storage Depot	This site is not preferred because it is remote from existing settlements. Initial phases of any development would therefore be unsustainable, and development would need to be of a sufficient size to provide all required services and facilities and function as a new settlement. This level of development could not be accommodated within the tested site boundary.
(43) TPS115	East Wootton	This site was identified as a preferred site in the Housing Delivery Update (Feb 14) but removed following consultation due to landscape factors. Whilst considered sustainable, the site is not able to accommodate more than 200 dwellings hence not able to accommodate strategic scale development.
(45) TPS036	Land East of East Hanney	This site was identified as a preferred site in the Housing Delivery Update (Feb 14) but removed following consultation as the alternative site (South of East Hanney) was considered to be better connected to the village.
(49) TPS067	South of Kingston Bagpuize	Whilst the village is sustainable this site suffers from a number of constraints including harm to landscape and the rural edge of the village. The alternative site (East of Kingston Bagpuize) is preferred for development.
(54) TPS079	South Radley	Site includes land which is in active recreational use by the community. The removal of this area from the strategic site would leave it below the minimum area required for the provision of 200 dwellings hence not able to accommodate strategic scale development. Site is also located immediately between two ancient monuments and may be of archaeological significance.

* () Numbers in Brackets relate to Site Information Tables for short-listed sites set out in: Housing Delivery Update Supporting Paper: Appendix 5 (Feb 2014); and Topic Paper 3: Strategic Sites Selection (Nov 2014).
TPS (Topic Paper Site) Numbers relate to tested sites as set out in Appendix A: Topic Paper 3: Strategic Sites Selection (Nov 2014).

Appendix 3: The Council's Suggested Minor Modifications in relation to Issues raised to Matter 5.

No.	Category	Respondent	Person ID	Policy No.	Para No.	Page No.	Proposed minor modification	Reason for modification
1	Policy Wording	VOWH	N/A	CP8	N/A	Local Plan 52	Amend CP8 to delete Appleford – this village clearly falls within the South East Vale Sub Area	This amendment will help improve consistency
2	English Heritage – Archaeological Interest	Mr Martin Small English Heritage South East Region	724877	CP14	N/A	Local Plan 65	Add new criterion Viii: 'MINIMISE ANY IMPACT ON THE ARCHAEOLOGICAL SIGNIFICANCE OF THE SITE, TO INCLUDE THE RETENTION OF IN SITU ARCHAEOLOGICAL REMAINS, WHERE POSSIBLE, AND THEIR FULL INVESTIGATION AND RECORDING WITH THE RESULTS DEPOSITED IN A PUBLIC ARCHIVE'	The Council agrees this addition would clarify the sites importance for archaeology.
3	Policy wording	Vale of White Horse District Council	N/A	CP14	N/A	Local Plan 65	Amend first paragraph of CP14 to include a cross reference to Appendix F “.....The safeguarded area for the proposed reservoir is shown on the Adopted Policies Map and APPENDIX F	The council agree that this proposed change will provide further clarity.
4	Policy wording	Thames Water	N/A	CP14	N/A	Local Plan 65	Amend first paragraph of CP14: “Land is safeguarded for a reservoir and ancillary works between the settlements of East Hanney, Drayton and Steventon until the examination Thames	The council agree with Thames Water that this provides further clarity on the progress of the WRMP

							Water's Resources Management Plan 2019 HAS BEEN PUBLISHED FOLLOWING APPROVAL BY THE SECRETARY OF STATE	
5	Policy wording	Thames Water	N/A	CP14	N/A	Local Plan 65	<p>Amend second paragraph of CP14:</p> <p>"The proposed reservoir, if included AS A PREFERRED OPTION in an adopted Resources Management Plan, must be brought forward through a Masterplan, Development Brief, and Design Statement ning process agreed FOLLOWING CONSULTATION ON THOSE DOCUMENTS BY THAMES WATER WITH between the community, the local authority, the local highway authority and the statutory utility provider".</p>	The council agree that this provides further clarity to the policy wording
6	Policy wording	Thames Water	N/A	CP14	N/A	Local Plan 65	<p>Amend third paragraph of CP14:</p> <ol style="list-style-type: none"> 1. be demonstrably the best option to meet a clearly identified need, having regard to reasonable alternative options as set out within an adopted Water Resources Management Plan, and 2. be IN ACCORDANCE WITH THE MASTERPLAN, DEVELOPMENT BRIEF AND DESIGN STATEMENT AND MUST: in accordance with a comprehensive planning and development brief, including a 	The council agree that this provides further clarity to the policy wording

							masterplan and design statement that Minor typographical amendment to remove 'S' from leading word in each bullet point.	
7	Supporting text	Thames Water	N/A	N/A	New paragraph 5.48	Local Plan 64	New paragraph at 5.48: "THE UPPER THAMES RESERVOIR PROPOSAL, IF PROGRESSED, MAY CONSTITUTE A NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT UNDER THE PLANNING ACT 2008 AND THEREFORE AN APPLICATION FOR DEVELOPMENT CONSENT IS LIKELY TO BE SUBMITTED TO THE PLANNING INSPECTORATE FOR DETERMINATION"	
8	Appendix	VOWH	N/A	N/A	N/A	Appendix 9	Annotate figure on Page 9 to show area of proposed development site to be retained within Green Belt. (refer to Appendix A4 below)	The Council considers that this provides clarity and ensure consistency with the Adopted Policies Map.
9	Appendix	VOWH	N/A	N/A	N/A	Appendix 9	Add the following text to the last bullet point on page 10: 'ENSURE THAT ANY DEVELOPMENT WITHIN THE OXFORD GREEN BELT CONSISTS OF COMPATIBLE USES'	The Council considers that this provides clarity and improve consistency.

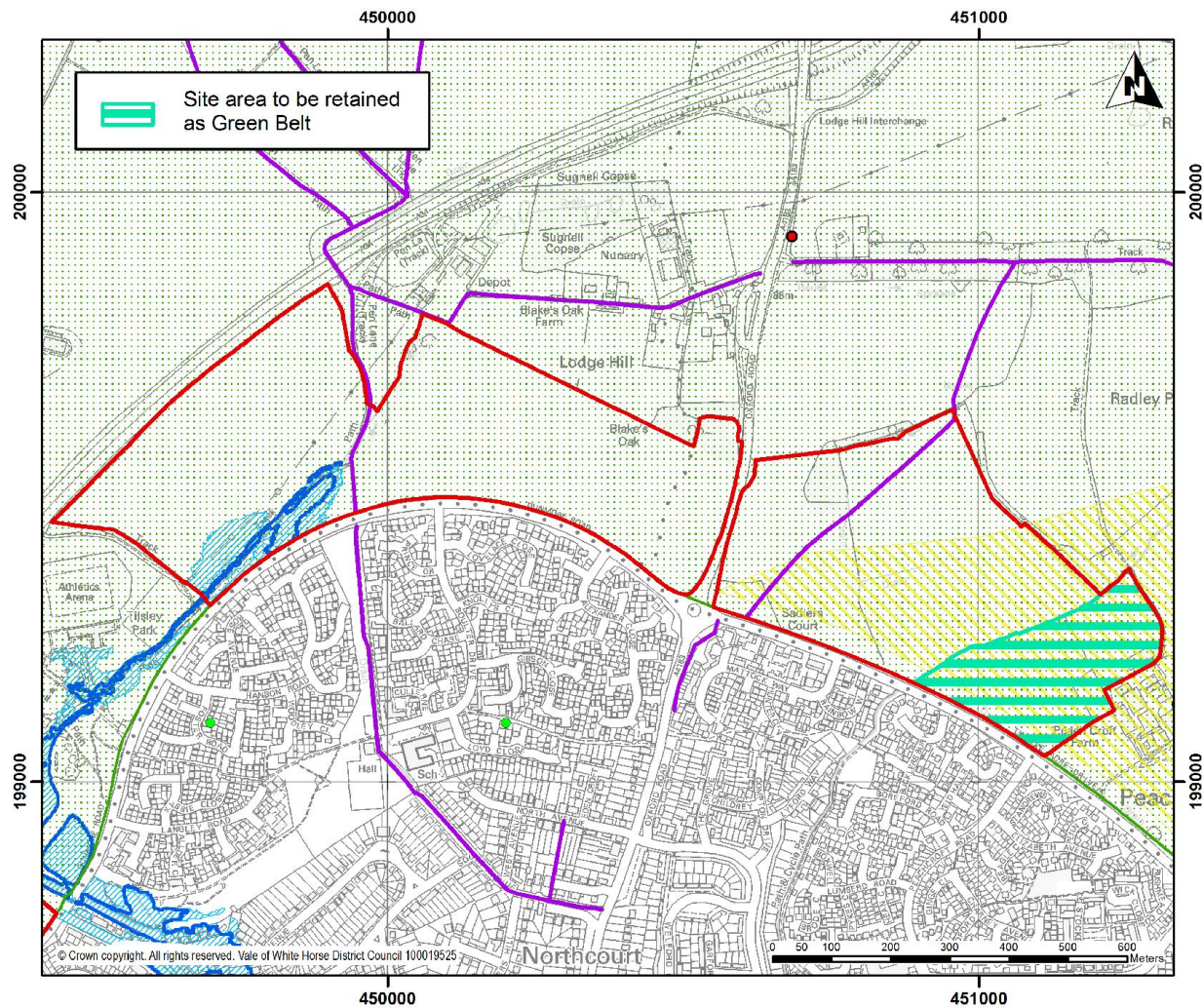


Figure A4: proposed amendments to Appendix F