



**Vale
of White Horse**

District Council

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Local Plan 2031
Part 2
Detailed Policies and
Additional Sites

TOPIC PAPER 2
Site Selection

This paper is one of six topic papers, listed below, which form part of the evidence base in support of the Publication Version of the Vale of White Horse Local Plan 2031 Part 2.

These topic papers have been produced to present a coordinated view of the evidence that has been considered in drafting the Local Plan 2031 Part 2. It is intended these papers will make it easier to understand how the council has reached conclusions on specific matters.

The council published topic papers alongside the Preferred Options Local Plan 2031 Part 2 for consultation in March 2017. Following the consultation, the topic papers have been updated.

The papers are available to view and access from the council website:

www.whitehorsedc.gov.uk/LPP2

Topic Papers are as follows:

1. Duty to cooperate
2. Site selection
3. Building healthy and sustainable communities
4. Supporting economic prosperity
5. Supporting sustainable transport and accessibility
6. Protecting the environment and responding to climate change

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1.0 INTRODUCTION

- 1.1 This topic paper provides a summary of how the Council has selected development sites for inclusion within the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites (hereafter referred to as the Part 2 plan).
- 1.2 The Part 2 plan will sit alongside the Local Plan 2031 Part 1 (hereafter referred to as the Part 1 plan) which was adopted in December 2016. The Part 1 plan includes the strategic priorities for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area over the plan period, 2011 to 2031. It also identifies a number of district wide policies which provide strategic guidance on a number of topics.
- 1.3 The Part 2 plan includes policies and locations for housing to meet the agreed quantum of Oxford's unmet housing need to be addressed within the Vale of White Horse District. The Part 2 plan also includes policies for the part of Didcot Garden Town that lies within the district, detailed development management policies to complement the Part 1 plan and allocates additional development sites for housing.
- 1.4 This topic paper is published alongside the Publication Version of the Part 2 plan for consultation. 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. Preferred site options have emerged through a site selection process, which commenced in summer 2016. Site selection has been an iterative process, with technical work and informal consultation informing the process at key stages. This topic paper has been updated following consultation on the Preferred Options Part 2 plan (9 March to 4 May 2017).
- 1.5 Reasonable site options have been tested through the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment and Habitats Regulations Assessment. Both of these are legislative requirements of the plan making process and have taken place alongside the preparation of the plan. The SA helps to identify preferred options to inform the preparation of the plan.
- 1.6 The structure of this topic paper is as follows:
 - **Section 2: Policy and Evidence Context** – provides a summary of relevant national policies, local policies and key evidence base studies that provide policy and guidance on site selection.
 - **Section 3: Site Selection Methodology** – explains the methodology for identifying preferred sites for inclusion within the Part 2 plan.
 - **Section 4: Spatial Requirements** – explains the spatial context for site selection reflecting the specific housing needs to be met in the Part 2 plan.
 - **Section 5: Summary of Preferred Options Consultation** – provides a summary of the consultation responses received regarding site selection.
 - **Section 6: Conclusion** – identifies the preferred sites for inclusion within the Part 2 plan.

1.7 The detailed outcomes of site selection are shown in the council's Housing and Economic Land Availability Assessment (HELAA) and Appendices A-B of this topic paper. **Appendix A** provides a summary of the site selection process. This includes a summary of when and why sites were discounted from the selection process. **Appendix B** provides a detailed assessment of those sites considered reasonable for potential development.

2.0 POLICY AND EVIDENCE CONTEXT

National Policy

National Planning Policy Framework (NPPF)

2.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how they are expected to be applied. At its heart is the need to ensure planning contributes towards the delivery of sustainable development, which should encompass economic, social and environmental considerations in equal measure.

2.2 The NPPF identifies core planning principles that should underpin plan making, this includes that planning should:

*“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”.*¹

2.3 In relation to plan-making the NPPF states:

“Crucially, local plans should:

- indicate broad locations for strategic development on a key diagram and land use designations on a proposals map, and
- allocate sites to promote development and the flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate”².

2.4 The NPPF sets out the need for local planning authorities to significantly boost housing supply, this includes:

*“identifying key sites which are critical to the delivery of the housing strategy over the plan period ... identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements ... to ensure choice and competition in the market for land' and 'identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”*³.

¹ CLG (2012) The National Planning Policy Framework, Paragraph 17

² CLG (2012) The National Planning Policy Framework, Paragraph 157

³ CLG (2012) The National Planning Policy Framework, Paragraph 47

- 2.5 The NPPF sets out that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities⁴.
- 2.6 The NPPF states local planning authorities should have a clear understanding of housing needs in their area. This includes preparing a

“Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”⁵.

- 2.7 A Local Plan should be based on adequate, up-to-date and relevant evidence and that assessments of and strategies for housing, employment and other uses are integrated, full account of relevant market and economic signals⁶.

Planning Practice Guidance (PPG)

- 2.8 The Planning Practice Guidance (PPG) section on ‘housing and economic land availability assessment’ is of particular relevance to this topic paper⁷. The ‘housing and economic land availability assessment’ section guides councils in identifying appropriate land to meet development needs.
- 2.9 In line with the NPPF paragraph 47, it states that an assessment of land availability is required to identify the future supply of land that is ‘suitable, available and achievable, for housing and economic development uses over the plan period⁸’. The PPG states the assessment will form a key component of the evidence base to underpin policies in development plans, including supporting the delivery of land to meet identified need for these uses through pro-actively choosing sites to go forward in development plans⁹.
- 2.10 In particular, the guidance explains that an assessment of land availability should:
- identify sites and broad locations with potential for development
 - assess their development potential, and
 - assess their suitability for development and the likelihood of development coming forward (their availability and achievability).
- 2.11 Although the assessment is a key evidence source to inform plan making, it does not itself determine whether a site should be allocated. It is the role of the assessment to provide information on a range of sites which are available

⁴ CLG (2012) The National Planning Policy Framework, Paragraph 52

⁵ CLG (2012) The National Planning Policy Framework, Paragraph 159

⁶ CLG (2012) The National Planning Policy Framework, Paragraph 158

⁷ CLG (2013) Planning Practice Guidance: section on “Housing and economic land availability assessment”

⁸ CLG (2013) Planning Practice Guidance, Reference ID:3-001-20140306

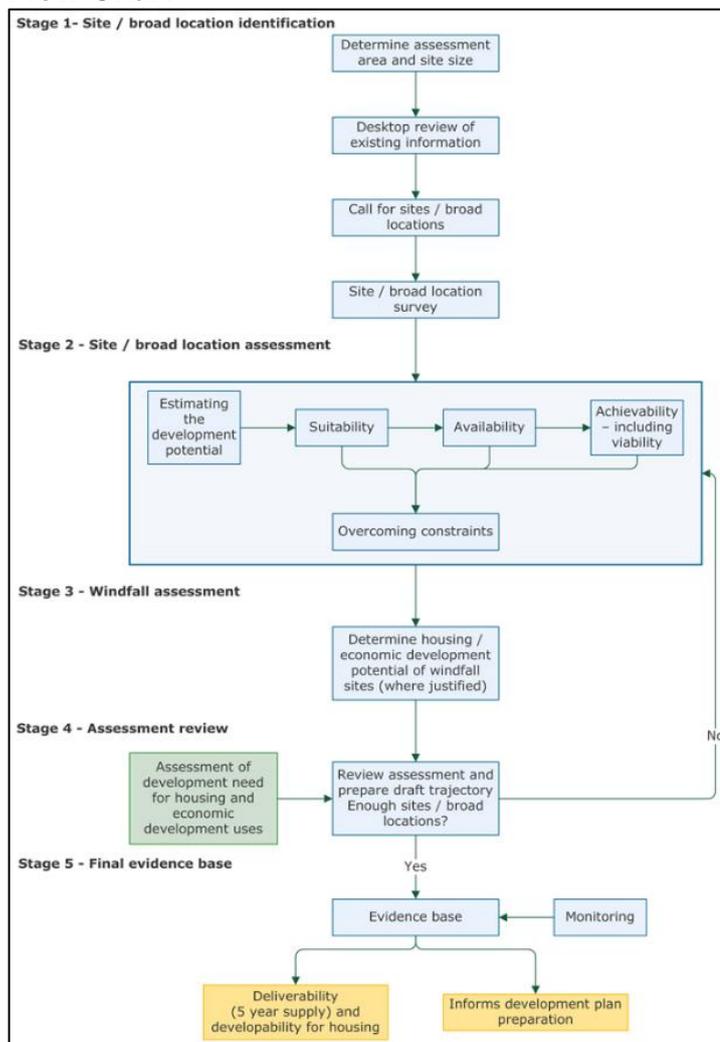
⁹ CLG (2013) Planning Practice Guidance, Reference ID 3-002-20140306

to meet the need but it is for the development plan to determine which of those sites are the most suitable to meet those needs¹⁰.

2.12 The PPG provides an indication of the inputs and processes that should lead to a robust assessment of land availability. It states plan makers should have regard to the guidance in preparing their assessments and the assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance¹¹.

2.13 The guidance sets out a broad methodology for undertaking the assessment and provides a flow chart, shown in Figure 2.1 below. The methodology includes five stages. The PPG is clear that the detail required should be proportionate ensuring a robust assessment. The assessment will need to be more detailed where sites are considered to be realistic candidates for development¹².

Figure 2.1: PPG Housing and Economic Land Availability Assessment Flow Chart



¹⁰ CLG (2013) Planning Practice Guidance, Reference ID 3-003-20140306

¹¹ CLG (2013) Planning Practice Guidance, Reference ID 3-005-20140306

¹² CLG (2013) Planning Practice Guidance, Reference ID 3-015-20140306

Local Policy

Local Plan 2031 Part 1: Strategic Sites and Policies (the Part 1 plan), Adopted December 2016

- 2.14 The Part 1 plan was adopted in December 2016. It sets the overall development strategy for the district for the period to 2031. It includes strategic policies as well as locations for strategic housing and employment sites. It also provides the policy context for Neighbourhood Development Plans¹³.
- 2.15 The Part 1 plan sets out the Spatial Strategy for the district, “Building on our strengths”. It directs the location of housing, employment and identifies where new infrastructure and services will be required. The three main strands to the spatial strategy are:
- focus sustainable growth within the Science Vale area
 - reinforce the service centre roles of the main settlements across the district, and
 - promote thriving villages and rural communities whilst safeguarding the countryside and village character.
- 2.16 Core Policy 4 sets out the housing needs for the district, it shows the majority of the housing needs for the district will be met through a combination of existing completions, known commitments and strategic allocations. It identifies a figure of 1,000 dwellings to be addressed through the Part 2 plan, but notes that this figure will be reduced where dwellings are allocated in Neighbourhood Development Plans or come forward through the development management process.
- 2.17 The Council's approach to addressing unmet housing need arising from other Oxfordshire authorities in the plan period is explained in Core Policy 2. It states:
- “To ensure Oxford’s unmet need is addressed, the Council will allocate sites to contribute towards Oxford’s unmet housing need within the Local Plan 2031: Part 2, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1. This will ensure that unmet need is considered and planned for in a timely manner and is tested through a robust plan-making process in accordance with national policy, national guidance, the Strategic Environmental Assessment (SEA) Environmental Assessment of plans and Programmes Regulations and the Habitats Regulations Assessment (HRA)”.*¹⁴

¹³ Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, available at: <http://www.whitehorsedc.gov.uk/lpp1>

¹⁴ Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, Core Policy 2, available at: <http://www.whitehorsedc.gov.uk/lpp1>

Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area: Meeting the Objectively Assessed Need for Housing in Oxfordshire. September 2016

- 2.18 The memorandum of co-operation was agreed and signed by the leaders of five of the six local authorities in Oxfordshire at a Growth Board meeting held on the 26 September 2016¹⁵. The memorandum sets out how much of the unmet housing need from Oxford City is to be apportioned among the four district councils and Oxford City Council.
- 2.19 For the Vale of White Horse District Council, the agreed proportion was 2,200 dwellings. This figure forms the agreed quantum of unmet housing need to be addressed through the Part 2 plan, as set out in Core Policy 2 and subject to the plan making process.
- 2.20 The memorandum explains that the respective local authorities will be responsible for the allocation of housing sites to meet their apportionment:
- “The Programme does not seek to identify, propose or recommend any site or sites for additional housing within any district. Each LPA will remain responsible for the allocation of housing sites within its own district and through its own Local Plan process.”¹⁶*

Oxford Spatial Options Assessment 2016

- 2.21 The Oxfordshire Growth Board commissioned Land Use Consultants (LUC) in December 2015 to carry out a spatial options assessment for meeting Oxford City’s unmet housing need up to 2031. The purpose of this study was to inform the Growth Board’s decision concerning how Oxford’s unmet need would be apportioned between the neighbouring districts.
- 2.22 The overall aim of the spatial options assessment was to provide a criteria-based analysis of spatial options that could assist in meeting Oxford’s unmet housing need. There were a total of 36 spatial options tested which were identified and agreed for consideration.
- 2.23 The spatial options assessment assessed site options that were above 500 dwellings and included an assessment of the sustainability of each option, as well as an assessment of their deliverability and viability. This assessment was important in informing the apportionment. A number of studies such as the Strategic Oxford Green Belt Assessment, and the Transport and Education Assessments were undertaken as part of the post SHMA work programme to inform the Oxford Spatial Options Assessment. A significant focus of the assessment was regarding the sites relationship with Oxford.

¹⁵<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/partnerships/GrowthBoard/MemorandumofCooperation.pdf>

¹⁶ Oxfordshire Growth Board, Memorandum of Co-operation, paragraph 3.6

- 2.24 The assessment has assessed sites individually however the cumulative impact has not been assessed. The assessment makes it clear that it does not:

"Make specific recommendations about which option should or should not be taken forward' and that 'it will be the role of subsequent Local Plan reviews to allocate specific development sites"¹⁷.

- 2.25 Specifically in relation to Green Belt, the assessment has included the overall performance of each site against the aims and purposes of the Green Belt, as assessed in the Strategic Oxford Green Belt Assessment, however the assessment is clear that:

"the detailed findings of the Oxford Green Belt Study will need to be taken into account by the authorities when deciding which spatial options to take forward. This will include consideration of the reasons for the ratings given and the overall performance of each land parcel/broad area."¹⁸

- 2.26 This is consistent with the agreement in the memorandum of co-operation, as highlighted above. It is important that the Vale's apportionment of unmet need is tested through a robust plan making process in accordance with national policy, national guidance, the Strategic Environmental Assessment (SEA) of Plans and Programmes Regulations, and the Habitats Regulations Assessment (HRA).

- 2.27 The Oxford Spatial Options Assessments informed the Oxfordshire Growth Board's decision on the apportionment of Oxford's unmet need, which is set out in the Post SHMA Work Programme Report to Oxfordshire Growth Board on the 26 September 2016. Appendix 1 of that Report sets out the detail of the Programme, the work streams which were commissioned; how the findings were considered and the conclusions which were reached. This states that:

"in assessing the conclusions of the LUC Spatial Options Assessment Project, the Project Team has drawn on the first 9 criteria as a key reference. This was because those criteria relate the most to an area of searches relationship to Oxford (such as the relationship to key employment sites in the City and to the Universities)¹⁹"

The first 9 criteria all relate to the spatial relevance of options to Oxford. The following criteria (10 to 26) relate to social, economic and environmental criteria including impacts on landscape, and Green Belt.

- 2.28 In the Vale, ten sites were assessed with three of the sites being considered deliverable, with all of these sites located in the Green Belt. These sites formed the basis for the Vale's apportionment of 2,200 dwellings. They were:

¹⁷ LUC (2016) Oxford Spatial Options Assessment

¹⁸ LUC (2016) Oxford Spatial Options Assessment

¹⁹ Oxfordshire Growth Board Post SHMA Work Programme Report and Appendices (section 125), September 2016

- Land at Abingdon-on-Thames (North), for 1,100 dwellings,
- Land at Botley, for 550 dwellings, and
- Land at Cumnor, for 550 dwellings.

2.29 The detailed outcomes are set out in Appendix 3 of the report prepared by LUC²⁰.

²⁰ LUC (2016) Oxford Spatial Options Assessment

3.0 SITE SELECTION METHODOLOGY

- 3.1 This section of the topic paper briefly summarises the site selection methodology. The methodology is based on the approach taken to inform the Part 1 plan and follows a five-stage process, as shown in Table 3.1. The work undertaken to identify development sites for inclusion in the Part 1 plan provided an up-to-date baseline for identifying sites for inclusion in the Part 2 plan. The evidence supporting the Part 1 plan has therefore provided a starting point for this site selection process.
- 3.2 The Council has undertaken a site selection process that includes the processes and inputs required to ensure a robust and proportionate assessment has been undertaken. Table 3.1 provides a summary of the site selection process.

Table 3.1: Site Selection Methodology

Stage	Description of process
Stage 1	<p>Identification and Initial Assessment of Sites</p> <ul style="list-style-type: none"> • Identification of potential sites informed by existing evidence, a call for sites and other sources, including those sites assessed in the Oxford Spatial Options Assessment. • Identification of high level suitability, availability and achievability of sites. • Outcomes are detailed in the Housing and Economic Land Availability Assessment (HELAA). • Those sites assessed as suitable for further consideration were taken forward to Stage 2. Those sites that had planning permission were not taken forward.
Stage 2	<p>Initial Site Filters</p> <ul style="list-style-type: none"> • Two filters were applied to sites suitable for further consideration, as follows: <ul style="list-style-type: none"> ○ Site capacity threshold of less than 50 dwellings ○ Sites within the Western Vale²¹ • Those sites that met either of the filters were excluded from Stage 3.
Stage 3	<p>Detailed Assessment of Constraints and Opportunities</p> <ul style="list-style-type: none"> • Detailed assessment of constraints (desktop) • Identification of potential opportunities • High level assessment of whether constraints could be overcome • Assessment of whether the sites are in accordance with the Development Plan including emerging policies. • Those sites that were considered to have reasonable potential for development to meet the specific housing needs in the Part 2 plan were taken forward to Stage 4.
Stage 4	<p>Detailed Evidence Testing, Informal Consultation and Sustainability Appraisal</p> <ul style="list-style-type: none"> • Detailed evidence testing of sites, including: <ul style="list-style-type: none"> ○ Landscape Capacity Study

²¹ Those sites located in the Western Vale Sub Area adjoining either the South East Vale Sub Area or the Abingdon and Oxford Fringe Sub Area were not excluded from the assessment

Stage	Description of process
	<ul style="list-style-type: none"> ○ Evaluation of Transport Impacts ○ Water Cycle Study ○ Strategic Flood Risk Assessment ○ Viability Assessment ○ Green Belt Assessment ● Engagement with prescribed bodies, key stakeholders and infrastructure providers ● Sites assessment from Sustainability Appraisal (SA) ● Sites assessment from Habitat Regulations Assessment (HRA) ● Sites taken forward where evidence has demonstrated they are the most sustainable options
Stage 5	<p data-bbox="419 611 1375 645">Identification of Preferred Sites</p> <ul style="list-style-type: none"> ● List of preferred sites. These sites are identified to: <ul style="list-style-type: none"> ○ fully meet the agreed quantum of unmet housing need for Oxford to be addressed within the Vale ○ support the Councils 'Spatial Strategy' to support Science Vale, and ○ include sites capable of delivering homes in the first five years to contribute towards the five-year housing land supply.

3.3 All sites have been through this process. New sites or revised sites that were submitted during the Preferred Options consultation have also been through this process. Where new information was provided on existing sites this has been taken into account. In addition to this, where key infrastructure providers have provided comments through the consultation these have been taken into account.

3.4 The detailed outcomes of site selection are shown in the council's Housing and Economic Land Availability Assessment (HELAA) and Appendices A and B of this topic paper. **Appendix A** provides a list and summary of those sites considered suitable for consideration from the HELAA through the site selection process. This includes details on when and why sites were discounted from the selection process. **Appendix B** provides a detailed assessment of those sites considered reasonable for potential development.

Stage 1: Identification and Initial Assessment of Sites

3.5 The first stage of site selection is to identify all potential sites in the district and undertake a high level assessment of suitability, availability and achievability of all sites through a Housing and Economic Land Availability Assessment (HELAA). This HELAA is required at an early stage of plan preparation and its purpose is to identify sites that may be available in the district to meet current and future needs²². Sites that have capacity to deliver 5 dwellings or more are considered in the HELAA²³.

3.6 The HELAA provides information on a range of sites concluding whether a site is suitable for consideration and therefore should be taken forward to

²² Government's Guidance is available at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

²³ National Planning Practice Guidance: Reference ID: 3-010-20140306

Stage 2 of the site selection process. Those sites that have absolute constraints reflecting national or local designations, are excluded from further assessment. This includes where a site is predominately or wholly containing a European Nature Conservation Area, Site of Special Scientific Area, Scheduled Monument, or the site lies wholly or mostly within Flood Zone 2 or 3. It is considered these sites have no potential for housing development and therefore are not taken forward to Stage 2.

- 3.7 The Preferred Options HELAA (March 2017) identified approximately 419 potential sites. 14 sites were excluded from the assessment as they were unable to deliver 5 or more dwellings. A total of 10 sites were considered unsuitable for development due to the absolute constraints explained above. Therefore a total of 395 sites were considered suitable for further consideration.
- 3.8 Following the Preferred Options consultation, the number of all potential sites identified in the HELAA reduced from 419 to 401 sites. This revised number of potential sites reflects an update to the number of sites with planning permission, review of evidence including evidence submitted through the consultation with some HELAA sites being consolidated, and 9 new sites. A high level assessment of suitability, availability and achievability of the new sites has been undertaken.
- 3.9 From 401 sites, 13 sites were excluded as they were unable to deliver 5 or more dwellings. A total of 8 sites were considered unsuitable for development due to the absolute constraints explained above. The HELAA concluded that there were 380 sites which are suitable for further consideration. This demonstrates there is sufficient land available in the district to meet the requirements of Local Plan 2031 Part 2.
- 3.10 Further detail can be found in the Publication Version of the HELAA. Details of the sites that were discounted at Stage 1 can be found at **Appendix A** of this topic paper.

Stage 2: Initial Site Filters

- 3.11 The HELAA provided 380 sites that were considered suitable for further consideration. Before further detailed assessment could take place, the Council applied two filters to establish which sites could be reasonably taken forward:
 - **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. The threshold of sites having capacity to accommodate

50²⁴ plus dwellings, both alone or in combination with adjacent sites has enabled a range of sites to be assessed and expands on the number of sites considered through the Part 1 plan process. The Council considers that Neighbourhood Plans provide an appropriate approach for planning for sites less than 50 dwellings.

- **Exclusion of Sites in the Western Vale Sub Area:** A key aim of the Part 2 plan is to identify sites to meet the Vale's proportion of Oxford's unmet need and allocate additional sites. In allocating sites to meet Oxford's unmet need, it is considered they need to relate well with Oxford. In addition to allocating sites to meet this need, the Council also considers allocating further housing in the South East Vale Sub Area will support a key strand of the Spatial Strategy in supporting growth in the Science Vale area. Allocating housing in the Western Vale Sub Area will not help to meet either of these aims. In addition to this, the housing requirement for the Western Vale Sub Area has been fully met by the Part 1 plan. It is therefore considered there is no need to allocate or assess sites in the Western Vale Sub Area. However where sites are located within the Western Vale Sub Area and adjoin either the Abingdon and Oxford Fringe Sub Area or the South East Vale Sub Area, the Council took a reasonable approach and did include these within the assessment.

3.12 Following the initial site filters, 235 sites were taken forward to Stage 3 with 145 sites being discounted. Details of the sites discounted at Stage 2 can be found at **Appendix A** of this Topic Paper.

Stage 3: Detailed Assessment of Constraints and Opportunities

- 3.13 The initial site filters resulted in 226 sites going through the detailed assessment of constraints and opportunities. This stage focused on the detailed assessment of constraints, the identification of opportunities, high level assessment of whether constraints could be overcome and whether the sites were in accordance with the district's Development Plan.
- 3.14 Detailed assessment of constraints based on existing evidence, opportunities and a high level of assessment of whether constraints could be overcome included the following:
- relationship to the built-up area of nearby/adjacent settlements
 - impact on important open gaps between settlements
 - capacity to provide new services, facilities or infrastructure alongside housing development
 - whether the site is greenfield in the North Wessex Downs Area of Outstanding Natural Beauty outside of the built-up area of a settlement

²⁴ Based on a gross density of 25 dwellings per hectare (dph) for the majority of sites. Specific local circumstances resulted in a small number of sites being based on either a higher gross density of 40 dph or lower gross density of 20 dph densities.

- Landscape impacts²⁵
- proximity to a Listed Building
- designated as a Historic Park or Garden
- contains or adjacent to any other wildlife designations (e.g. Conservation Target Areas)
- contains or adjacent to Ancient Woodland
- within or adjacent to archaeological constraints
- safeguarded for mineral reserves
- on-site physical constraints, including electricity pylons and small watercourse
- where airfield safeguarding zones apply
- whether the site includes community forest
- whether the site contains Grade 1 or 2 agricultural land
- area of site within gas pipeline consultation area
- whether it is likely to be possible to provide access to the site

3.15 An assessment of whether the sites were in accordance with the district's Development Plan including the emerging Part 2 plan, was undertaken. Of particular significance was the Spatial Strategy, Core Policies 3 and 4 and the purposes of the Part 2 plan, which are explained in Section 4 of this paper. A key consideration is the need for the Part 2 plan to focus on meeting the Vale's proportion of Oxford's unmet need and thus the need for sites to be well located and accessible to Oxford.

3.16 The data collected on the constraints and opportunities of each site was undertaken through a desktop assessment including using evidence that informed the Part 1 plan, and planning decisions including appeal decisions. The Oxfordshire Spatial Options Assessment and associated technical evidence studies were also used as a key evidence to assist in this process.

3.17 The reasoning for sites being excluded for further consideration at Stage 4, related mainly to the following:

- the site was a greenfield site in the North Wessex Downs Area of Outstanding Natural Beauty
- impact on the open gap between settlements and potentially leading to coalescence
- impact on landscape
- the scale of development would not be sufficient to enhance a settlement's limited range of services and facilities and would not viably be able to provide new or expanded services and facilities
- site is within the Conservation Area and/or impacts on the special qualities, and
- cumulative constraints which result in insufficient developable area to deliver 50 dwellings.

²⁵ This principally includes evidence prepared as part of Local Plan 2031 Part 1 or where submitted through a planning application.

- 3.18 This stage resulted in a long list of sites, 235 sites being assessed with 138 sites being discounted. This resulted in 97 sites, taken forward to Stage 4. Details of the sites discounted at Stage 3 can be found at **Appendix A** of this topic paper. Of the sites assessed through the Oxford Spatial Options Assessment, 8 of the 10 sites were taken forward to Stage 4.
- 3.19 To assist with Stage 4, the Council considered whether the 95 sites could be considered in combination with other sites that relate well to one another and would provide sufficient dwelling capacity if combined to provide infrastructure on site. Reflecting this, the 97 sites were combined to form 33 sites for detailed testing purposes at Stage 4. **Appendix A** explains which sites were combined for the Stage 4 assessment.
- 3.20 Following the detailed assessment of the sites, the Council undertook an assessment of whether all broad areas in the district had been covered by the assessment. This resulted in the identification of one large area of search being taken forward to Stage 4 for detailed testing. This area of search is bounded by the A420 to the south, the A415 to the west the River Thames to the north and the Oxford Green Belt to the east. Therefore 34 sites were taken forward to Stage 4 for detailed testing.

Stage 4: Detailed Evidence Testing, Informal Consultation and Sustainability Appraisal

- 3.21 This stage focused on detailed testing of 34 sites. The testing was based on a number of technical evidence base studies that assessed sites impact or capacity to accommodate the development. The studies also considered any mitigation and/or compensation measures that were likely to be required as part of development on a site. The Council has published a series of evidence base studies demonstrating this, including:
- Landscape Capacity Study and Addendum Study: these studies consider the landscape sensitivity, value and capacity of a number of individual potential housing sites. The addendum reconsiders evidence for sites where updated information and/or revised site boundaries were received during and following Preferred Options consultation. The addendum also considers the landscape capacity of any new sites submitted.
 - Evaluation of Transport Impacts: this study assessed the impact of various spatial options on the highway network cumulatively
 - Viability Assessment: assessed the viability aspects of deliverability of the sites
 - Water Cycle Assessment – assessed sites in relation to water supply capacity, wastewater capacity and environmental capacity. Any water quality issues and associated water infrastructure upgrades that may be required and potential constraints have been identified.
 - Strategic Flood Risk Assessment – assessed the flood risk of the sites.
 - Green Belt Assessment – assessed the contribution of those sites located in the green belt against the aims and purposes of the Green

Belt and whether the release of these sites would harm the integrity of the Green Belt as a whole.

- 3.22 The majority of these evidence base studies were published alongside the Preferred Options Part 2 plan in draft form. These studies have been finalised ensuring relevant site options have been assessed and are published alongside the Publication Version of the Part 2 plan for consultation. The detailed testing of sites through plan preparation has been an iterative process.
- 3.23 The Council also undertook informal consultation with infrastructure providers and key stakeholders to identify any potential issues or 'showstoppers', which may prevent any of the sites being allocated for development. This included consultation with the Environment Agency, Natural England, Historic England, Thames Water and Oxfordshire County Council²⁶.
- 3.24 The Council undertook two rounds of engagement during the preparation of the Preferred Options Part 2 plan. The first round was undertaken in September 2016 and provided stakeholders the opportunity to review and provide comments on detailed assessment of all of the sites at Stage 4. This enabled stakeholders the opportunity to identify and inform the Council of any sites they considered were not deliverable. These comments were taken into account and another round of engagement took place in November 2016. This provided stakeholders with the list of preferred site options for inclusion in the Preferred Options Part 2 plan and provided another opportunity for commenting. The Council also circulated draft site development templates for the preferred sites for comment. The draft site development templates include all the site specific requirements development will need to deliver for that site. These templates are provided at **Appendix A** of the Part 2 plan. Feedback was considered and fed into the draft templates. This ensured key infrastructure requirements for each of the preferred site options was identified.
- 3.25 Following the Preferred Options consultation, the Council undertook another round of engagement with stakeholders which took place in July 2017. The Council circulated revised site development templates reflecting consideration of the Preferred Options consultation comments. In addition to this, the Council also sought feedback on the detailed assessment of an additional site which was promoted through the preferred options consultation that was taken forward to Stage 4.
- 3.26 Throughout the site selection process, the Council worked with the consultants AECOM to ensure reasonable site options were tested through Sustainability Appraisal (SA). The SA helped to identify both positive and negative impacts of developing the sites under consideration. A Habitats Regulations Assessment (HRA) was also prepared to identify if any aspects of the plan, including development sites, may have a likely significant effect on designated European sites.

²⁶ Further detail is included in the Duty to Cooperate Topic Paper

- 3.27 The evidence base studies and SA include an assessment of the individual impact of the sites. In addition to this, relevant studies and the SA have assessed the cumulative impact of sites. This included not only assessing the preferred site options in their entirety as a site package but also other differing site packages. The differing site packages ranged from a small number of larger sites to a larger number of smaller sites. This ensured different approaches to housing delivery were tested, along with reasonable options.
- 3.28 Following the detailed evidence testing, SA and engagement, 27 sites were discounted with 7 sites identified as preferred sites for inclusion in the Publication Version of the Part 2 Plan. Details of the sites discounted at Stage 4 can be found at **Appendix B** of this Topic Paper. The key issues arising through evidence gathering and the rounds of engagement have been summarised in pro formas for each of the 34 sites, which can be found at **Appendix B** of this topic paper. **Appendix B** also provides detail of whether the assessment for the site has differed between Preferred Options and Publication.

Stage 5: Identification of Preferred Sites

- 3.29 The site selection process for the Preferred Options Part 2 plan concluded 9 sites were the most sustainable and all 9 were included in the Preferred Option plan for consultation. Following the consultation, and the assessment of new or revised sites including any new evidence and consideration of comments, the site selection process concluded 7 sites were the most sustainable. Table 3.2 sets out the lists of sites included in each version of the plan.

Table 3.2. Preferred Site Options

Preferred Options Part 2 plan (March 2017)		Publication Version Part 2 plan (October 2017)	
Site	No. Dws	Site	No. Dws
Harwell Campus	1,000	Harwell Campus	600
Dalton Barracks	1,200	Dalton Barracks	1,200
East of Kingston Bagpuize with Southmoor	600	East of Kingston Bagpuize with Southmoor	600
North-West of Grove	300	North-West of Grove	400
North-East of Marcham	400	South-East of Marcham	90
South-East of Marcham	120	North of East Hanney	80
West of Harwell	100	North-East of East Hanney	50
North of East Hanney	80		
North-East of East Hanney	50		

Summary of Preferred Sites

- 3.30 The detailed assessment of all of the preferred sites options for the Publication Version of the Part 2 plan are included in **Appendix B**. A brief summary for each is provided including a summary explaining why the North East of Marcham and North of Harwell sites are excluded.

Dalton Barracks

- 3.31 The preferred site at Dalton Barracks represents a significant area of brownfield land, it is close to and well related to Oxford and it is considered the site is of a large size to provide a highly sustainable community including new services and infrastructure. The site is located in close proximity between the two proposed park and ride sites, and will likely have direct access to the proposed Rapid Transit Line 3 ensuring sustainable connections to east of Oxford as demonstrated through the Sustainable Transport Study for the Oxford to Abingdon Corridor. It is located in the Oxford Green Belt.
- 3.32 This site was not assessed during the Part 1 plan or through the Oxford Spatial Options Assessment as it has been a recent decision by the DIA to release the site from their estate and this make it available for redevelopment. The Council consider this constitutes a major change in circumstance to justify the review of the Green Belt as part of the Part 2 process. The Council have produced an Exceptional Circumstances Report which demonstrates this site meets these circumstances²⁷.
- 3.33 The Council has undertaken an assessment of the site's impact on the purposes of the Green Belt. The Green Belt Assessment concluded that the existing developed area of the barracks already has an impact on the openness of the Green Belt and could be redeveloped without harm to the Green Belt. The remaining area, the land in the north-east of the site and north-west of site contribute to purpose 3 with land in the north-east also contributing to purpose 2, however the Study concludes there is the potential for development within the site without significant harm to the wider Green Belt designation.

Harwell Campus

- 3.34 The preferred site at Harwell Campus represents an opportunity to develop a campus as a live-work-play community. The site is relatively unconstrained, and although it is situated in the AONB, the principle for development already exists due to its existing allocation for employment. The Council has assessed the impact of development on the AONB which concluded the proposal would have less of an impact than commercial development on the AONB and could be mitigated²⁸. The area has already experienced significant infrastructure improvements to the transport network. The site scores very well in sustainability terms overall and has excellent public transport connectivity.

²⁷ Dalton Barracks Exceptional Circumstances Report, HDA, October 2017

²⁸ Harwell Exceptional Circumstances Report, SQW and HDA, October 2017.

3.35 In addition to this paper demonstrating this site is a sustainable site, an Exceptional Circumstances Report²⁹ for the site has been produced providing evidence to demonstrate the need for the development at the Campus in accordance with the NPPF³⁰. In summary, the Report concludes:

- Is in the public interest to ensure the full potential of the scientific investment already made at Harwell is fully captured,
- The need for housing is key to recruitment and especially retention of staff, based on staff surveys and interviews, to ensure the long term success of Campus occupants
- There are no other alternative sites at the Campus to provide the work-live-play community required. The alternative sites considered are not at the Campus and thus are not considered to meet the need of the Campus. It has also been demonstrated through this site selection process that these sites are not as sustainable, and
- There would be no long term adverse effects of the 'Innovation Village' on the wider AONB and the proposals currently put forward would deliver a number of benefits to the AONB landscape (based on Hankinson Duckett Associates Landscape and Visual Assessment).

3.36 The Council proposed to allocate two sites at Harwell Campus through the Part 1 plan however the Inspector removed these sites from the plan prior to adoption. The preferred site identified at Harwell Campus is different to those sites removed from the Part 1 plan, due to the following:

- It is on a different site. It is on land that is designated for employment use through Local Plan 2011 Saved Policy E7 and Core Policy 6
- The site is being promoted by Harwell Campus Partnership and has support from the Oxfordshire Local Enterprise Partnership, and
- The Council in conjunction with the Campus Partnership have produced evidence relating to the need for housing at the Campus.

East of Kingston Bagpuize with Southmoor (Parish of Fyfield and Tubney)

3.37 The preferred site at East of Kingston Bagpuize with Southmoor (in the Parish of Fyfield and Tubney) is relatively unconstrained and is located along the A420 where there is a premium bus service that offers a frequent service to Oxford and Swindon, minimising the need to travel by car. Kingston Bagpuize with Southmoor is one of the most sustainable larger villages in the district and provides good level of services and facilities to serve the development. Development provides the opportunity to re-route the A415 out of the existing village through this site.

3.38 The site is located near to Kingston Bagpuize House, a grade II* listed building and abuts the conservation area however sufficient mitigation can be

²⁹ Harwell Exceptional Circumstances Report, SQW and HDA, October 2017.

³⁰ National Planning Policy Framework, Paragraph 116

provided to overcome any impacts through sensitive location of the development in the south of the site.

North West of Grove

- 3.39 The preferred site at North-West of Grove is relatively unconstrained on the edge of Grove, a highly sustainable location with a number of services and facilities. It is located between two strategic allocations at Monks Farm (to the east of the site) and Grove Airfield (to the south of the site) and will facilitate the coordinated master planning and delivery of infrastructure in Grove, in particular the Grove North Link Road. The site is not envisaged to deliver until later in the plan period.

South East of Marcham

- 3.40 The preferred site at South-East of Marcham is relatively unconstrained and located on the edge of the larger village of Marcham which offers a good range of services and facilities. There are public transport connections to Abingdon-on-Thames with walking and cycling provision and the development would present an opportunity to improve the provision.
- 3.41 There is an Air Quality Management Area (AQMA) in the centre of Marcham however it is considered that travel would go to the east towards Oxford and Abingdon-on-Thames, and therefore the Council considers the development of a small site will not adversely impact on the AQMA. It was initially considered that this site could accommodate 120 dwellings however the capacity has been reduced to 90 dwellings as part of the site overlapped with the land safeguarded for the Marcham bypass.

North of East Hanney and North-East of East Hanney

- 3.42 The preferred sites at North of East Hanney and North-East of East Hanney are highly unconstrained and are located at the larger village of East Hanney which offers a good range of facilities and services. Both sites are located near to the A338 with public transport provision to Wantage, Grove and Oxford with the development of these sites providing an opportunity to improve services.
- 3.43 The North of East Hanney site has a small area within Flood Zone 2 however there is sufficient capacity to deliver 80 dwellings as well as provide appropriate mitigation. In addition, the Environment Agency has not indicated this is a constraint to development. The East of East Hanney site relates will to the existing permissions to the south and west of the site.
- 3.44 The Council proposed to allocated a site at South of East Hanney in the Part 1 plan for 200 dwellings, however the Inspector removed this site reflecting an appeal decision on this site which dismissed the appeal. One of the main reasons for dismissal was the site did not relate well to the village. The Council consider the two preferred smaller sites identified do relate well to the village and are closer to the village's services and facilities

Summary of Excluded Sites

North East of Marcham

- 3.45 The North East of Marcham site was identified as a preferred site at the Preferred Options stage. The site is located at the larger village of Marcham which offers a good range of services and facilities with public transport provision to Oxford and Abingdon. This site would offer the opportunity to improve the existing public transport provision.
- 3.46 There is an AQMA within the centre of Marcham and concerns were raised, including an objection from Oxfordshire County Council, during the Preferred Options consultation relating to the impact of traffic on the air quality especially given the proximity of the site to the AQMA. Oxfordshire County Council also objected on the basis that the existing primary school could not expand further on its present site, and that the projected growth in Marcham would unlikely deliver a viable alternative. Following the objections raised by the County Council, a significantly reduced level of growth at Marcham is proposed as, at present, the Council does not have sufficient evidence to demonstrate that development would not have an adverse impact on the AQMA. In relation to primary school provision, a new primary school at Dalton Barracks would be in close proximity to Marcham and could offset some pressure on the current school in the village, particularly where some pupils travel from outside of the settlement.

West of Harwell

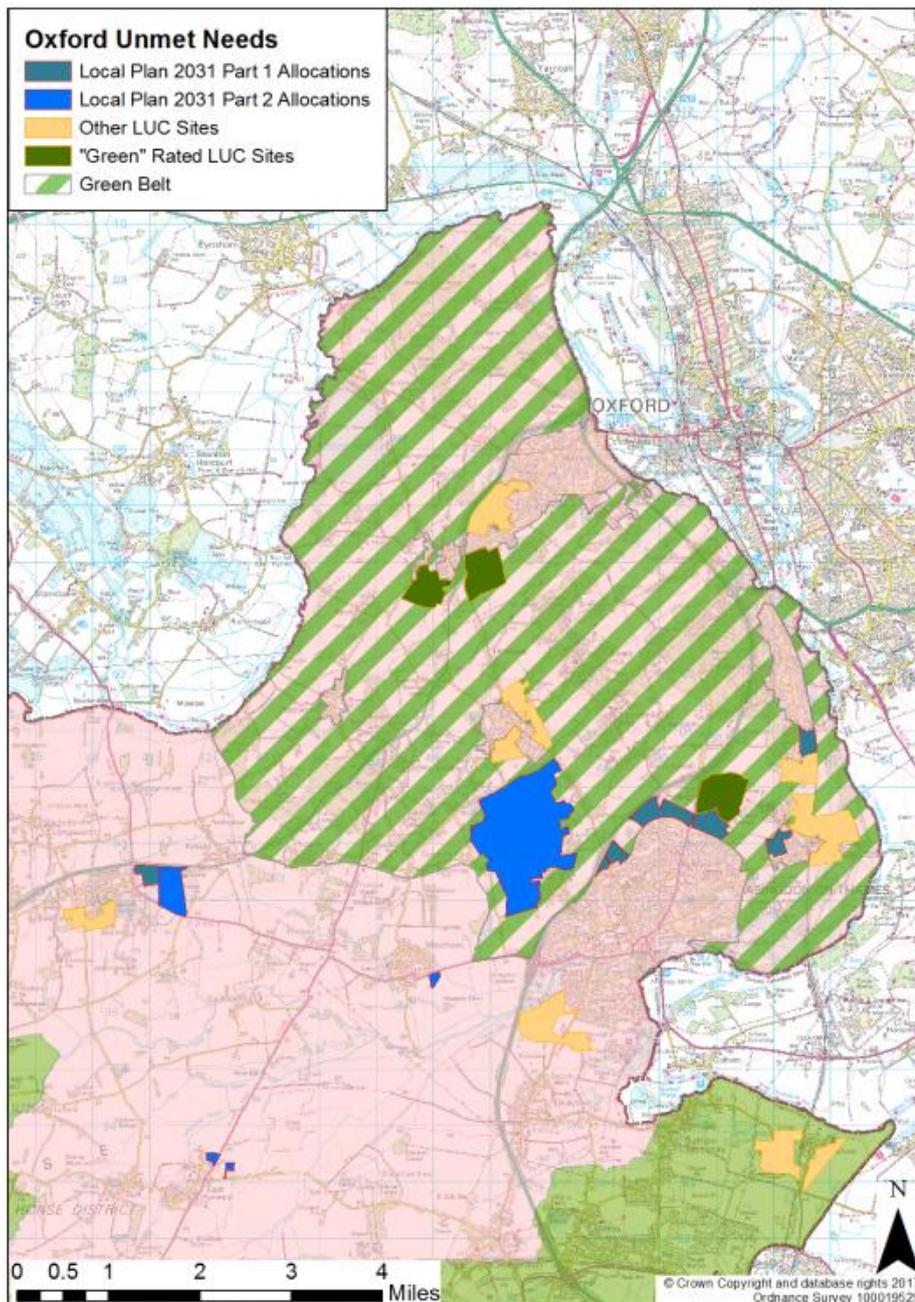
- 3.47 The West of Harwell site was identified as a preferred site at the Preferred Options stage. The site is located at Harwell Village, a highly sustainable larger village with good services and facilities, and excellent public transport connectivity. During the Preferred Options consultation, Oxfordshire County Council raised an objection to this site due to safety concerns relating to access to the site. At present, the Council does not have sufficient evidence to demonstrate this can be overcome.

Difference between Oxfordshire Growth Board Preferred Sites and Local Plan Preferred Options

- 3.48 The site selection process has included assessment of the sites identified through the Oxford Spatial Options Assessment, however none of these sites are identified as preferred sites including those sites identified by the Oxfordshire Growth Board to inform how Oxford's unmet need was apportioned for the Vale.
- 3.49 As detailed above, the Oxford Spatial Options Assessment findings have informed the site selection process including feeding into the relevant technical evidence base studies. Of particular relevance is the Strategic Oxford Green Belt Assessment which has informed the Vale Green Belt Assessment.

3.50 In assessing sites in the Abingdon-on-Thames and Oxford Fringe Sub Area, the Council recognise the Sub Area is constrained, notably by the Oxford Green Belt with around 46% of the Sub Area being covered by the Green Belt, as shown on Figure 3.2. This Figure also shows all the sites assessed in the Oxford Spatial Options Assessments in the Vale including the preferred sites identified by the Oxfordshire Growth Board and the preferred sites identified through this site selection process.

Figure 3.2: Abingdon-on-Thames and Oxford Fringe Sub Area Constraints Map



3.51 A key difference in the selection of sites for the Part 2 plan and those sites used to inform the Vale’s apportionment of Oxford’s unmet need is the assessment criteria and the weight to be given to criteria. Although the Oxford Spatial Options Assessment included a range of criteria to assess the

sites, it was the specific criteria relating to the spatial relevance of options to Oxford that was given significance by the Board. Therefore the significance of whether the sites were located in the Green Belt, whether there was an adverse impact on landscape including gaps between settlements, was not taken into account.

- 3.52 The Part 2 plan site selection process has fully ensured the sustainability of the sites has been assessed as well as consideration of whether the sites have spatial relevance to Oxford. This includes a comprehensive and detailed assessment of whether those sites that were located in the Green Belt³¹ contributed to the purposes of the Green Belt as well as detailed landscape capacity assessment. Table 3.3 summarises the outcome of the site selection assessment regarding the three sites used to inform the Vale’s apportionment of Oxford’s unmet need.

Table 3.3. Summary of Site Selection Assessment on Sites informing the Vale’s apportionment of Oxford’s unmet need

Site	Summary of Assessment
<p>North of Abingdon-on-Thames (Site Reference: ABIG_A)</p> <p>The Council also considered additional land to the west of the Oxford Road (A4183) as part of this detailed assessment.</p> <p>Discounted at Stage 4.</p>	<p>The Council’s evidence concluded this site has low landscape capacity and contributed to three of the purposes of the Oxford Green Belt, including particular areas of the site contributing to the perception of openness of the Green Belt. The Landscape Capacity Study identified that there were some views of Oxford City from within the site. The Council therefore considered it is not appropriate to propose release of this site from the Green Belt.</p> <p>This aligns with the outcomes of the Oxford Spatial Options Assessment which considered the site to have a “medium-high” and “high” ranking in landscape terms, meaning that development would be very likely to give rise to adverse or significant adverse landscape and/or visual effects (Appendix 3 p,182). The Assessment also identified that the site is within land parcel AT5 which was assessed in the Strategic Oxford Green Belt Study, and performed highly against one of the Green Belt purposes.</p>
<p>Land at Cumnor (Site Reference: CUMN_A).</p> <p>Discounted at Stage 3 and 4. The majority of the site assessed in the Oxford Spatial</p>	<p>The existing landscape evidence informing Local Plan 2031 Part 1 concluded that the land to the south of the existing residential properties in Cumnor was not suitable for development. (Landscape Capacity Study 2013, p.201-204). This area was therefore removed from the Stage 4 assessment.</p> <p>The remaining part of the site, which is closer to the historic core of Cumnor, was assessed in detail at</p>

³¹ The Vale Green Belt Assessment assessed those sites in the Green Belt that reached Stage 4 of the site selection process

Site	Summary of Assessment
<p>Options Assessment was discounted at Stage 3 of the site selection process</p>	<p>Stage 4 of the site selection process. The Council's Landscape Capacity Assessment concluded that this land had a medium landscape capacity, noting that the site had a distinctive character type with links to the adjacent Conservation Area, resulting in a reduced capacity. The Council's landscape evidence has demonstrated a significantly reduced capacity of the site relative to that used to inform the apportionment figure. The Council therefore consider this site is not appropriate and is unlikely to make a meaningful contribution to Oxford's un-met housing need.</p> <p>These issues align with the outcomes of the Oxford Spatial Options Assessment which considered the whole of the site to have a "medium" ranking in landscape terms. It recognised the open character of the larger southern part of the site, with the northern part contributing to setting of the Conservation Area. (Appendix 3 p,215)</p> <p>The Vale Green Belt Study concluded that the site makes a limited contribution to the overall aims of the Green Belt, due to its relatively enclosed nature. The Strategic Oxford Green Belt Study assessed this site as part of the larger site and concluded it performed highly against one of the Green Belt purposes.</p>
<p>Land at Botley (Site Reference: BOTL_A)</p> <p>Discounted at Stage 4.</p>	<p>The Council's evidence concluded this site has low landscape capacity and contributed strongly to the overall aims and purposes of the Oxford Green Belt. The Landscape Capacity Study identified the site to consist of an open and rural landscape. Development of the site would be out of context with the existing settlement patterned and has the potential to cause coalescence between Botley and Cumnor. The Vale's Green Belt Assessment concluded this site consistently performs well against the purposes of the Green Belt and any development within the site would harm the integrity of the wider Green Belt. The Council therefore consider it is not appropriate to propose release of this site from the Green Belt.</p> <p>The outcomes of the Oxford Spatial Options Assessment which considered the site to have a lesser "medium" ranking in landscape terms that the Council's own study. This concluded that development would be likely to give rise to some adverse landscape and/or visual effects (Appendix 3 p,198). The Oxford Strategic Green Belt Study assessed this site through two parcels (BO2 and BO6) and concluded BO2 performs</p>

Site	Summary of Assessment
	highly against five purposes while BO6 performs highly against three purposes. This aligns with the Council's own conclusions for this site.

3.53 In summary, and in accordance Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire, the Council have continued to work with the other Oxfordshire authorities through the Oxfordshire Growth Board to address Oxford's unmet need. The site selection process alongside the Part 2 plan has ensured a robust plan making process has been undertaken to site selection which has been undertaken in accordance with national policy and guidance, and informed by the Sustainability Appraisal and Habitats Regulations Assessment.

4.0 SPATIAL REQUIREMENTS FOR LOCAL PLAN 2031 PART 2

Oxford City's Unmet Housing Need

4.1 The agreed apportionment for the district is 2,200 dwellings for the period up to 2031 as identified in the memorandum of co-operation.

4.2 The Part 1 plan Inspector concluded that the Council's approach to meeting its apportionment of Oxford's unmet need was appropriate. Core Policy 2 states

"As a first step, Vale of White Horse District Council has sought to accommodate the housing need for Vale of White Horse District in full in the Vale of White Horse Local Plan 2031 Part 1 ... to ensure Oxford's unmet need is addressed, the Council will allocate sites to contribute towards Oxford's unmet housing need within the Local Plan 2031: Part 2".

4.3 This approach ensured there was no delay to the adoption of Part 1 plan. He states:

"Thus, whilst the plan as submitted does not provide for all the unmet needs of Oxford which have been agreed should be provided for in the Vale (with an assumed "start date" of 2021), its adoption now would allow for some housing suitable to meet these needs to come forward quickly. Delaying adoption of the plan would allow for it to provide for all the unmet needs which have recently been agreed to be appropriately accommodated in the Vale, but would inevitably also delay the actual provision of houses to meet any of these needs."³²

4.4 In accordance with Core Policy 2, the district's housing requirement is therefore its own housing need (20,560 dwellings) plus its apportionment of Oxford's unmet need (2,200 dwellings) either at the point of adoption of the Local Plan 2031 Part 2 or from 2 years from the Adoption of the Part 1 plan (equating to 22,760 dwellings). Although the Vale's proportion of Oxford's unmet need has been agreed through the Oxfordshire Growth Board, as detailed in the memorandum of cooperation as 2,200, the amount is subject to the plan making process. The Vale's apportionment of Oxford's unmet need is therefore subsumed into the overall housing requirement for the district.

4.5 The Inspector also concluded that delaying the adoption of the Part 1 plan would specifically lead to the delay of the delivery of four sites around Abingdon-on-Thames, Radley and South of Kennington (within Radley Parish). Although these sites are primarily allocated to meet the Vale's need, these sites are also well related to Oxford City and would be available to meet their need too. Oxford City Council confirmed at the Examination that they also considered these sites to be well located to provide for their own need. The Inspector states:

³² Inspector's Report paragraph 26

“The plan as submitted, 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’³³.

- 4.6 These four sites are located to the north and north-west of Abingdon-on-Thames, south of Kennington (within Radley parish) and north-west of Radley which equate to 1510 dwellings. These sites are sustainable locations for development in the Vale, with comparatively high levels of services and facilities, good public transport connectivity with opportunities for improvement and good access to a wide range of employment. They are also close to and easily accessible to Oxford.
- 4.7 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. This approach will maximise the district’s ability to deliver its own housing needs as well as the housing needed for Oxford at the earliest opportunity.
- 4.8 The allocation of sites to meet the district’s apportionment of Oxford’s unmet needs reflects this approach. The site allocations in both Local Plans will contribute towards the 22,760 housing requirement. As the Inspector highlights, the housing to be provided on allocations at Abingdon-on-Thames, Kennington and Radley in the Part 1 plan, would be just as much available to people in the Vale and Oxford, and thus in reality, it is impossible to assign a site to meet just Vale or Oxford need. It is therefore considered appropriate that specific sites are not identified or ‘ringfenced’ to wholly meet Oxford’s unmet need.
- 4.9 The Part 1 plan Inspector highlighted that sites within both the Abingdon-on-Thames and Oxford Fringe Sub Area and South East Vale Sub Area could be appropriate to meet the district’s apportionment of Oxford’s unmet need. He states:

“.. the Abingdon-on-Thames and Oxford Fringe Sub-Area contains the Vale’s largest settlement (Abingdon) in addition to the local service centre of Botley and a number of larger villages, including Radley and Kennington. A substantial part of the OAN arises from demographic changes which points to a need for new housing in this part of the district as well as in the area of

³³ Inspector’s Report paragraph 25

greatest employment growth. Moreover, this part of the district is closest to Oxford City which, notwithstanding the growth of Science Vale, is likely to remain a very important centre for employment and services for residents of the Vale. Moreover, whilst the Abingdon-on-Thames/Oxford Fringe sub-area is closer to Oxford, it is true that more than 3,000 dwellings proposed in the South East Vale (the two Valley Park sites) would also be close to Didcot Station with its fast and frequent rail service to Oxford”³⁴.

- 4.10 Reflecting the Inspector’s Report, the Council consulted on the option of both the Abingdon-on-Thames and Oxford Fringe and South East Vale Sub Areas meeting its apportionment of Oxford’s unmet need in the Preferred Options Part 2 plan (March 2017). Three key concerns were raised through consultation regarding sites in the South East Vale Sub Area contributing to the districts proportion of Oxford’s unmet need and regarding affordable housing. These were:
- lack of clarity over which specific sites will meet the need and thus there is no certainty that this need will be met by sites near Didcot Train Station. It could be that these sites are not accessible or well related to Oxford;
 - lack of consistency with the Oxford Spatial Options Assessment which did not consider Didcot as it was considered there are more appropriate areas to meet this need in the Vale, such as settlements in the Abingdon and Oxford Fringe Sub Area that offer more sustainable options e.g. Botley and Abingdon, and
 - it is unclear how the housing figures address affordable housing need for Oxford. Oxford City Council would expect an agreement to be reached to enable an appropriate proportion of new affordable homes in the Vale area to be made available to people on the Oxford register.
- 4.11 The Council has considered these concerns and is now proposing to meet all of the Vale’s proportion of Oxford’s unmet need in the Abingdon-on-Thames and Oxford Fringe Sub Area, as detailed in the Publication Version of the Part 2 plan. In response to the concerns raised, the Council consider this approach will provide clarity that the sites are demonstrably close and well related to Oxford if solely contained within the Abingdon-on-Thames and Oxford Fringe Sub Area. This area is closest to and has frequent and reliable public transport linkages to Oxford. This is also consistent with the key focus of the Oxford Spatial Options Assessment and the scope of the spatial options considered within the assessment. Therefore the total of the unmet need of 2,200 dwellings has been added to the Abingdon-on-Thames and Oxford Fringe Sub Area.
- 4.12 In addition to all of the Vale’s apportionment of Oxford’s unmet need being delivered in the Abingdon-on-Thames and Oxford Fringe Sub Area, the Council have provided further clarity in identifying the allocated sites, which together, demonstrate there is ‘at least’ 2,200 dwellings that are close to and relate well to Oxford. These sites are listed in Table 4.1 and Figure 4.1 provides a concept diagram illustrating these sites are close and accessible to Oxford.

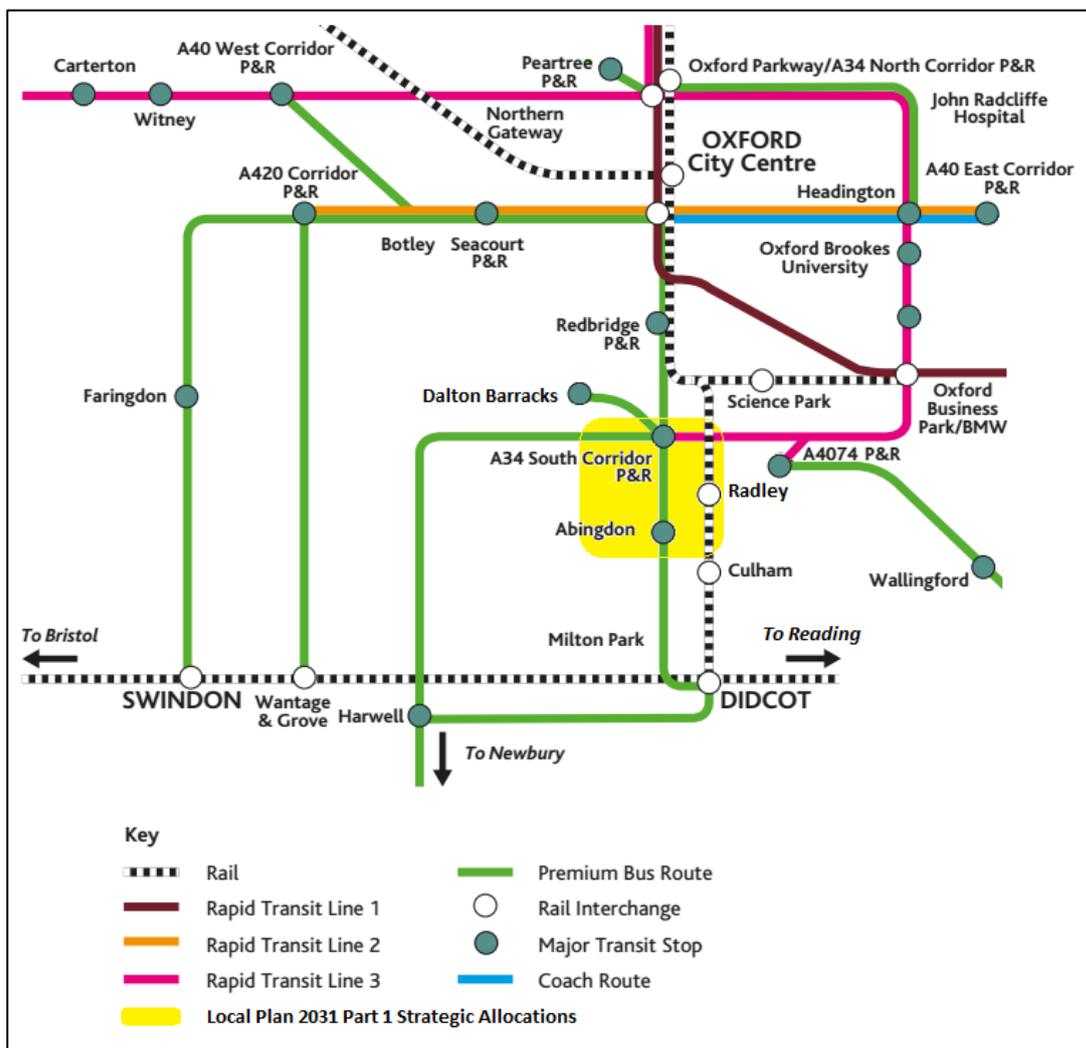
³⁴ Local Plan 2031 Part 1, Inspector Report, Paragraphs 55 and 56

Table 4.1: Sites that are close to and relate well to Oxford

Allocation	Local Plan	Number of Dwellings
North of Abingdon	Part 1	950*
North West of Abingdon	Part 1	200
South of Kennington	Part 1	270
North West of Radley	Part 1	240
Dalton Barracks	Part 2	1,200
Total		2,860

*The LPP1 allocation for North Abingdon-on-Thames was for around 800 dwellings, however a Planning Application for 950 dwellings was given resolution to grant on 26 July 2017

Figure 4.1: Map showing that dwellings are provided for on sites within the Abingdon-on-Thames and Oxford Fringe Sub-Area that are suitably close to and accessible to Oxford



- 4.13 Providing this clarification also responds to the concerns raised relating to affordable housing provision to meet Oxford's unmet need. The Council recognises the need to not only provide market housing to meet Oxford's need but also affordable housing. The Council consider the process to determine the proportion of affordable housing is a matter for housing allocation policies, not for planning policy. The Council makes a commitment within the plan to engage with Oxford City to establish and agree a way forward.
- 4.14 Allocating all of the apportionment in the Abingdon-on-Thames and Oxford Fringe Sub Area is consistent with the Spatial Strategy of the Local Plan, in particular; *reinforcing the service centre roles of the main settlements across the district, and promoting thriving village and rural communities whilst safeguarding the countryside and village character*. Table 4.2 details which strand each of the preferred sites meets.

Table 4.2: Consistency with Spatial Strategy

Site	Consistency with Spatial Strategy
North-West of East Hanney	<p>Reinforcing the service centre roles of the main settlements across the district, by:</p> <ul style="list-style-type: none"> • Focusing housing growth at the Market Towns, Local Service Centres and Larger Villages. <p>Promoting thriving villages and rural communities whilst safeguarding the countryside and village character, by:</p> <ul style="list-style-type: none"> • Focusing development within the rural areas to the Larger Villages, thus helping to maintain their vitality and the sustainability of local services.
East of East Hanney	
East of Kingston Bagpuize with Southmoor (Fyfield and Tubney Parish)	
South-East of Marcham	
Dalton Barracks	
North-West of Grove	
Harwell Campus	<p>Focusing sustainable growth within the Science Vale area, by:</p> <ul style="list-style-type: none"> • Allocating appropriate land for strategic housing growth to help improve the self-containment of the area. New homes will be delivered at five key locations: <ul style="list-style-type: none"> ○ Including Harwell Campus.

- 4.15 The Council's Monitoring Framework, at Appendix N of the Part 2 plan, includes specific indicators to monitor the delivery of the sites identified in Table 4.1 as to whether sufficient housing is being permitted and delivered in the Vale to meet the Vale's apportionment of Oxford's unmet need of 2,200. This includes monitoring of both market and affordable housing.

Vale of White Horse District Housing Needs

- 4.16 The Part 1 plan allocates sufficient housing to meet the district's own housing need, 20,560 dwellings, as shown in Core Policy 4. The Inspector in his Report concluded:

“Whilst the district-wide housing requirement of 20,560 is slightly exceeded, there is variation in the extent to which the housing requirement identified in the plan for each of the sub-areas is met by the plan's allocations and existing commitments. The ‘Part 2’ plan will need to take account of this in allocating any further sites for housing. However, in the context of there being a five year supply of deliverable housing land both across the district as a whole and within the ring fence area, there is not a need for this to be addressed in the Part 1 plan.”³⁵

- 4.17 In the Submission version of the Part 1 plan, the Council proposed two strategic housing sites on greenfield land adjoining Harwell Campus, equating to 1,400 dwellings, in the South East Vale Sub Area. However during the Examination process, the Inspector deleted both of these sites from the Plan. The Inspector explains the deletion of these sites:

“would reduce the potential supply of housing in the South East Vale and the Council may wish to consider the need to allocate replacement sites in this area through the Part 2 plan”³⁶.

- 4.18 The Council considers it is reasonable to assess whether there are any additional sustainable site allocations in the South East Vale Sub Area to support the key strand of the Spatial Strategy “focusing sustainable growth within the Science Vale area”. Additional site allocations will support the accelerated delivery of housing within the Science Vale which is a priority for the Oxfordshire LEP, and support the delivery of strategic infrastructure. The delivery of both will help to unlock the areas potential for economic growth. In addition to supporting a key strand of the spatial strategy, additional housing allocations will boost the district's housing supply in the Science Vale Ring Fence area.
- 4.19 The Council has considered whether there is a need to allocate further allocations in the Western Vale Sub Area. Reflecting the updated completions and commitment figures, as shown in Core Policy 4a of the Publication Version of the Part 2 plan, there is no shortfall in the Western Vale Sub Area and thus no need to allocate any further sites. Also, the Part 1 plan Inspector does not refer to a specific need to allocate further sites in the Part 2 plan in this area. The Council therefore will not be seeking to allocate any further sites in the Western Vale Sub Area. Where there are sites that adjoin either the Abingdon-on-Thames and Oxford Fringe Sub Area or the South East Vale Sub Area within the Western Vale Sub Area the Council has taken a reasonable approach and included these in the site selection process.

³⁵ Inspectors Report Paragraph 160

³⁶ Inspectors Interim Findings, Paragraph 9.12

Windfalls

4.20 The NPPF states local authorities can make allowance for windfalls 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.”³⁷

4.21 In the Part 1 plan, Core Policy 4 included a windfall allowance with the Inspector concluding the five year supply figure includes a very modest (1.3%) allowance for 140 dwellings to come forward as windfalls stating there was evidence to justify this.

4.22 The Council has reviewed the completions on small housing sites that have taken place between 2011/12 and 2016/17. Table 4.3 shows these completions by year, with the average housing completions per year being 169 dwellings.

Table 4.3: Completions on small housing sites

2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total
104	88	99	90	186	448	1015

4.23 This clearly demonstrates that small housing sites are a reliable source of supply in the district. Reflecting this, the Council is proposing to increase its windfall allowance from 70 dwellings a year to 100 dwellings a year.

³⁷ National Planning Policy Framework, Paragraph 48

5.0 SUMMARY OF PREFERRED OPTIONS CONSULTATION

- 5.1 The Council consulted on the Preferred Options Part 2 plan and associated evidence base studies from 9 March to 4 May 2017. This included a draft Site Selection Topic Paper and draft HELAA Report. A number of comments were received on the respective draft reports including the preferred and alternative site options.

Summary of HELAA Consultation Responses

- 5.2 Table 5.1 provides a summary of the consultation responses received regarding the draft HELAA Report and provides a response from the Council. The Consultation Statement sets out in further detail the responses received³⁸.

Table 5.1: Summary of Comments relating to the HELAA

Summary of Representations	Council Response
Some or all the existing Local Plan policies are not considered in the assessment.	The HELAA is the starting point in the plan making process. Its purpose is to identify sites that may be available to meet the housing and economic needs of the district. Stage 3 and 4 of the site selection process ensure the relevant Development Plan policies are considered. See Table 3.1
Other constraints should be considered more in the exclusion of sites at this stage.	A robust and comprehensive site selection process has been undertaken which includes a thorough assessment of constraints. The purpose of Stage 1, the identification and initial assessment of sites, as shown in the HELAA, is to identify the high-level suitability of the sites.
The HELAA should consider sites unsuitable where they have been discounted at later stages	The site selection process follows 5 stages ensuring a proportionate and transparent assessment has been undertaken. It would be incorrect and not transparent for the Council to amend Stage 1 findings reflecting the findings of later stages.
HELAA should consider all sites to be unsuitable in the Western Vale sub area as Local Plan 2031 Part 2 does not seek to allocate there.	The HELAA is the starting point in the plan making process. Its purpose is to identify sites that may be available to meet the housing and economic needs of the district. It is not the appropriate stage to apply filters, which is applied at Stage 2.
The HELAA Appendices should be clearly labelled and easier to navigate.	The HELAA Appendices are categorised alphabetically by settlement name. The electronic version of the Appendices (PDF)

³⁸ Consultation Statement, October 2017

Summary of Representations	Council Response
	is sub-divided by each settlement. An interactive GIS version of the HELAA is available to view online: http://maps.whitehorsedc.gov.uk/gis/?cat=ap&ref=8
A single map showing all of the HELAA sites would be helpful.	An interactive GIS version of the HELAA which shows all HELAA sites across the district is available to view online: http://maps.whitehorsedc.gov.uk/gis/?cat=ap&ref=8
The 9 sites discounted at the earliest stage should be listed in the main report. These sites should be clearly evidenced.	Further detail on when and why sites were discounted has been provided within the Appendix A to this Paper. This includes detail of the sites discounted at Stage 1.
Paragraph 2.27 should refer to adopted, instead of “emerging”.	This correction has been made.
Sites discounted through Local Plan Part 1 should not be considered again.	The HELAA is the starting point in the plan making process. Its purpose is to identify sites that may be available to meet the housing and economic needs of the district. This stage needs to identify all potential sites to ensure a comprehensive assessment which includes sites previous assessed and discounted. This is in accordance with national guidance.
Density should be greater than the stated 25 dwellings per hectare on land closer to Oxford.	The approach to housing density in the HELAA is consistent with the site selection methodology used for Local Plan 2031 Part 1. The figure of 25 dwellings per hectare (dph) is a gross figure, which allows for the provision of on-site infrastructure such as roads and open space, and therefore the net density is nearer to 35dph. In more sustainable locations, such as Abingdon-on-Thames, Wantage, Faringdon, Botley and Grove, the assessment has used a density of 40dph (gross) for those sites within the built-up area.

Summary of Site Selection Topic Paper Consultation Responses

- 5.3 Table 5.2 provides a summary of the consultation responses received regarding the draft Sites Selection Topic Paper and provides a response from the Council. The Consultation Statement sets out in further detail the responses received.

Table 5.2: Summary of Comment relating to the Site Selection Process

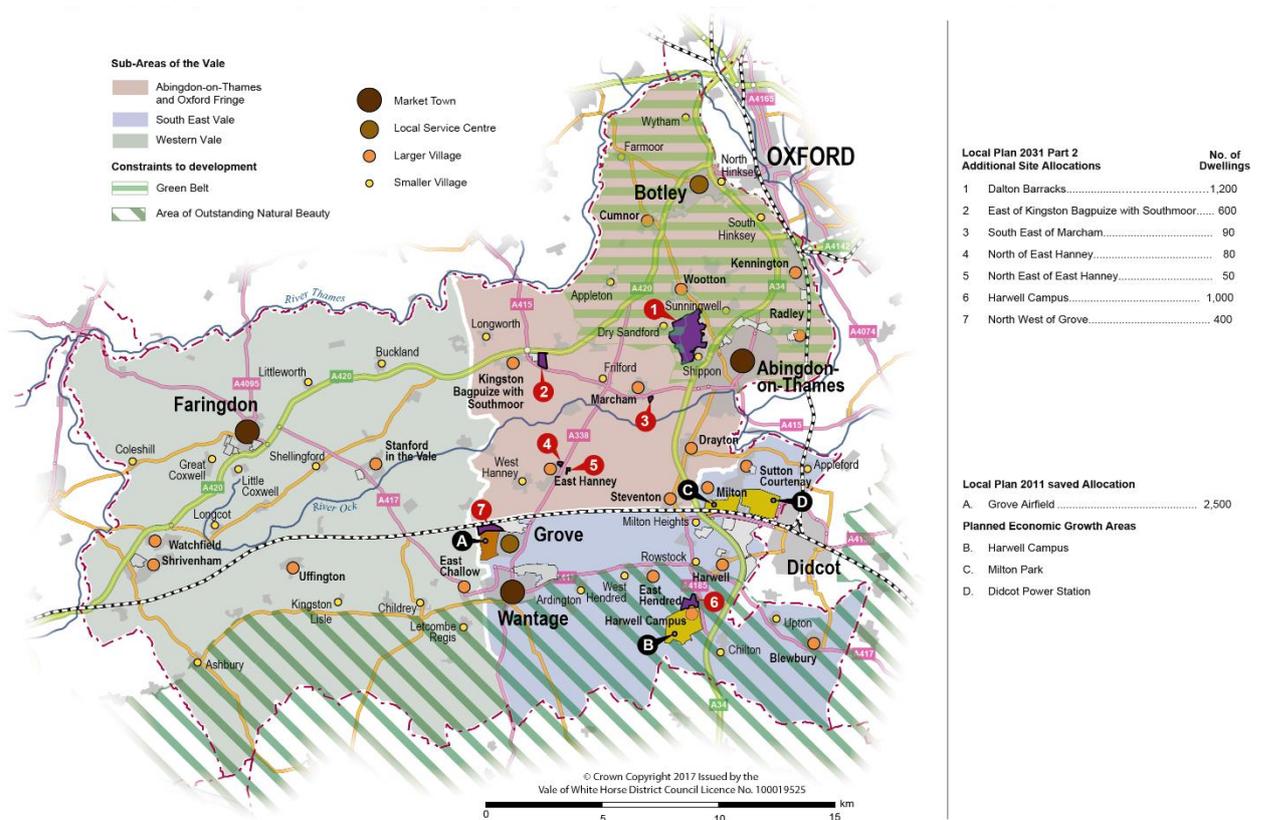
Summary of Representations (Site Selection Topic Paper)	Council Response
It is unclear where specific sites were discounted from further consideration in the selection process. These should be clearly documented and evidenced.	Further detail on when and why sites were discounted has been provided within Appendix A to this Paper.
Sites discounted through the preparation of LPP1 should not be considered again through LPP2.	The HELAA is the starting point in the plan making process. Its purpose is to identify sites that may be available to meet the housing and economic needs of the district. This stage needs to identify all potential sites to ensure a comprehensive assessment which includes sites previous assessed and discounted. This is in accordance with national guidance.
There is a lack of evidence underpinning the selection of smaller sites (those capable of delivering less than 200 dwellings).	A comprehensive and robust assessment has been undertaken of all sites. Appendix A provides detail on when and why all sites were discounted. This demonstrates a consistent and thorough assessment of sites under 200 dwellings as well as over 200 dwellings.

5.4 The Consultation Statement sets out in further detail the responses received regarding the preferred sites. The Council received support from promoters of the sites proposed for allocation in LPP2. In relation to alternative sites, the Council received 65 alternative sites through the preferred options consultation, which included several sites which have already been tested in detail. Over half of these sites were in the Abingdon-on-Thames and Oxford Fringe Sub Area, with the remainder split between the South-East Vale Sub Area and the Western Vale Sub Area. The Council has considered all new evidence relating to the alternative sites received and have re-assessed each site in accordance with the methodology set out in this topic paper. The Council's conclusions on these and all other sites are reflected in **Appendix A and B** of this topic paper.

6.0 CONCLUSION

- 6.1 This paper summarises the site selection process the Council has undertaken to identify additional development sites for allocation in the Part 2 plan.
- 6.2 A comprehensive and robust site selection process has been undertaken in accordance with national policy and guidance. A number of stages have been undertaken to ensure sites were fully assessed in terms of their sustainability. All potential sites were identified from a range of sources and were assessed in the HELAA to determine whether the sites were suitable for further consideration. These sites were then subject to site filters, detailed desktop assessment and then detailed evidence testing, informal consultation with key stakeholders and formal public consultation. A summary of the site assessment is provided at **Appendices A and B**.
- 6.3 The Preferred Options version of the Part 2 plan included the nine sites that were assessed as the most sustainable. Following consultation and further assessment of the new and revised sites and considering consultation responses, it is concluded there are seven preferred site options that are considered the most sustainable. These are shown in Figure 6.1.

Figure 6.1: Map of Site Options



- 6.4 The seven preferred sites are Dalton Barracks, East of Kingston Bagpuize with Southmoor, South East of Marcham, North of East Hanney, and North

East of East Hanney in the Abingdon-on-Thames and Oxford Fringe Sub Area and Harwell Campus and North West of Grove in the South East Vale Sub Area.

- 6.5 The Council are ensuring its proportion of Oxford's unmet need is met by demonstrating that at least 2,200 dwellings are close to and well related to Oxford through a combination of Part 1 strategic site allocations and Part 2 additional allocations all within the Abingdon-on-Thames and Oxford Fringe Sub Area. This Sub Area is closest to and has frequent and reliable public transport linkages to Oxford.
- 6.6 The Council are also supporting a key strand of its Spatial Strategy in identifying preferred additional site allocations in the South East Vale Sub Area. This Sub Area included the Science Vale where significant economic growth is planned. Additional site allocations will support the accelerated delivery of housing and the delivery of strategic infrastructure which will help unlock the areas potential for economic growth.

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Please contact Planning on 01235 422600

Planning Policy Team
135 Eastern Avenue, Milton
Park, Abingdon, OX14 4SB

Email: planning.policy@whitehorsedc.gov.uk

www.whitehorsedc.gov.uk