



**VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2.**

**DETAILED POLICIES AND ADDITIONAL SITES**

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**Response by Arnold White Estates Ltd**

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## **Contents**

- 1 Introduction**
- 2 Housing Numbers**
- 3 PVLP2 Site Selection Process for the Abington And Oxford Fringe Sub-Area**
- 4 Analysis of the identified sites in PVLP2**
- 5 The Exclusion of Radley South**
- 6 Conclusions**

## **Appendices**

- 1 Extract of completed consultation response form**
- 2 Radley South Concept Plan**

## 1.0 INTRODUCTION

- 1.1 Gardner Planning Ltd (**GPL**) was instructed in 2014 by Arnold White Estates Ltd (**AWEL**) to assess the Radley South Site and make representations on the 'Vale of White Horse Local Plan 2031'. AWEL is acting as Promoter, on behalf of the site owners (members of the Dockar- Drysdale and Colton families), of land south of Radley known as 'Gooseacre' (referred to in this Response as **Radley South**).
- 1.2 The process to date has resulted in the adoption of the Local Plan Part 1 (**LP1**) without the allocation of the Radley South Site, despite it being proposed for release from the Green Belt by the Vale of White Horse District Council (**VWHDC**) in the Submission Plan. The Local Plan Part 2 Consultation Draft Preferred Options (March 2017) was responded to in April 2017.
- 1.3 This has now reached the 'Publication Version' of Part 2 (October 2017) (**PVLP2**) to which this is the Response. Some of the issues are complex, and the context needs to be explained. The relevant text and policy references are given. The completion of a prescribed form alone would be inadequate for this purpose and VWHDC has agreed to the nature of this Response. Appendix 1 provides a brief summary in the format of the pro-forma, but this Response is intended to be read in full.
- 1.4 Because this Response is an objection to the Plan which focusses on the exclusion of the Radley South site<sup>1</sup>, it mainly deals with the Abingdon-on-Thames and Oxford Fringe Sub-Area (**AOF Sub-Area**).
- 1.5 This Response submits that PVLP2 in its present form **is unsound** when assessed against the tests in the National Policy Planning Framework<sup>2</sup> (**NPPF**), in that **it is not**

***Positively prepared*** - being based on a strategy where the needs of the Housing Market Area have not been met.

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<sup>1</sup> Topic Paper 3 site ref TPS 079/ Site 54

<sup>2</sup> Framework para 182

**Justified** - it is not the most appropriate strategy when considered against reasonable alternatives, and site selection has been relatively arbitrary;

**Effective** - it will not deliver sufficient housing over its plan period.

**Consistent with national policy** - the Plan does not realistically reflect the content of the NPPF or the Housing White Paper.

- 1.6 Furthermore, the **Duty to Cooperate has not been met** because the process instigated by the Oxfordshire Growth Board to apportion Oxford's unmet housing need has not been successful, so that VWHDC cannot assume in the PVLP2 that its share of 2,200 is the final figure. South Oxfordshire DC has not agreed in its emerging Local Plan to accommodate its share such that there is a shortfall of 1,200 homes, which needs to be resolved.
- 1.7 The exceptional circumstances therefore exist for consideration of development opportunities currently located within the Green Belt to address some of this shortfall. **The Radley South site offers a highly sustainable and deliverable site, which should be included in PVLP2.**

## 2.0 HOUSING NUMBERS

- 2.1 For the purposes of **Duty to Cooperate**, Oxfordshire Growth Board Report sought to distribute Oxford's unmet housing needs to the surrounding Districts calculated to be 14,850 homes<sup>3</sup>. VWHDC accommodates an additional 2,200 homes in PVLP2 which represent a portion of the Oxford unmet needs<sup>4</sup> which brings the total housing requirement to "at least"<sup>5</sup> 22,760. However, this calculation is now in disarray because the South Oxfordshire District's Pre-Submission Local Plan Policy STRAT3 – 'The unmet housing requirements from Oxford City' makes a contribution of 3,750 homes towards Oxford city's unmet housing needs - 1,200 homes short of the GB Report's 4,950 apportionment. There is no published update of the 'apportionment' exercise so that it is unclear how this missing number is to be accommodated. It is therefore premature for PVLP2 to limit its contribution to the original 2,200 homes.
- 2.2 The comparison of the **housing figures** in LP Pt1 and PVLP2 is confusing. This response considers that the PVLP2 fails the test of soundness - 'positively prepared'
- 2.3 PVLP2 **CP 4a** does not adequately show how the number of homes to be allocated has been calculated. Paragraph 2.14 states that AOF Sub-Area should accommodate an extra 2,200 homes for Oxford's unmet needs "*as set out by Core Policy 4a*". But that policy has a different number of just 2,020 additional homes.
- 2.4 District need in the AOF Sub-Area calculated in LP Pt1 CP8 was to allocate 1,790 homes in LP Pt1 plus 722 homes to be allocated in LP Pt2. PVLP2 para 2.14 adds 2,200 homes in the AOF Sub-Area for Oxford's unmet need - a total PVLP2 allocation requirement of 2,922 homes but PVLP2 CP4a allocates 2,020 homes. PVLP2 para 2.22 Table 2.1 is 'VWH LP allocations that are close to and accessible to Oxford' which shows the 4 LP

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<sup>3</sup> Oxfordshire Growth Board Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area Sept 2016 'Meeting the Objectively Assessed Need for Housing in Oxfordshire'.

<sup>4</sup> PVLP2 Core Policy 4a

<sup>5</sup> PVLP2 para 2.7

- Pt1 sites and adds one site (Dalton Barracks) with 1,200 home capacity. How this relates to the extra 2,200 homes is not explained.
- 2.5 East of Kingston Bagpuise is a Pt1 site with a capacity of 280 homes. A second site of 600 homes (to the East) is added in PVLP2. Both sites are not now regarded available for 'Oxford's needs'<sup>6</sup>.
- 2.6 Even if four of the five of the Pt 1 sites plus Dalton Barracks represent the 'Oxford' sites (2,860 PVLP2 para 2.22 Table 2.1); and 'District' need is CP4a 820 (without Dalton Barracks) plus Pt 1 East Kingston Bagpuise (280), the total should add up to 4,712 (1790 + 722+ 2,200) but it totals 3,960 (2,860 + 820 +280) - a shortfall of 752 homes.
- 2.7 **Policy 8a** seeks to update the LP Pt1 figures, but Pt1 was adopted in December 2016 and the stated purpose of Pt2 (para 1.1 p15) is to identify additional sites and accommodate Oxford's unmet needs. No justification is given (nor is there a new Housing Topic Paper) for re-writing Pt1's Core Policy 8: 'Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area'. In Pt 1 the housing requirement for the plan period was 5,438. PVLP2 para 2.14 adds the 2,200 Oxford unmet need figure so should total 7,638, but CP8a gives the new figure of 7,512 - a shortfall of 126.
- 2.8 Compared to LP Pt 1, in PVLP2 completions have gone up (another year added), commitments have correspondingly gone down, windfalls have increased by 68 (28%), although the period has reduced, without explanation. The 5-year housing land supply statement April 2017 has a District figure of 70 p.a., but nothing has been published to provide a Sub-Area breakdown.
- 2.9 These two policy roots (CP4/4a and CP8/8a) both show a shortfall of either 752 or 126 homes. Greater explanation is required and the justification for PVLP2 to fundamentally amend adopted Pt1 CP4 and 8 policies.

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<sup>6</sup> PVLP2 Table 2.1 p23

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- 2.10 **The selection of additional sites** in PVLP2 Policies 4a and 8a is not adequately explained, and Section 3 of the GPL Response critically examines this in detail. The additional sites selected are generally extensions to small, unsustainable settlements which are poorly connected in transport terms, and remote from Oxford. Their only apparent attribute is that they are not in the Green Belt, but the test of sustainability has been failed in the process.
- 2.11 The housing numbers in the AOF Sub-Area rely heavily on the contribution of Dalton Barracks, which is not supported by the evidence (fails 'Effective' test). The identification of the 'key site' of Dalton Barracks is flawed contrary to NPPF para 47 pt 1. (fails 'Consistent with National Policy' test)
- 2.12 The site 'Radley South' (capacity 240 homes) - see separate Section 5 below - should be added to, or substituted for some of the Part 2 Allocations in CP4a and CP8.

### 3.0 PVLP2 SITE SELECTION PROCESS FOR THE ABINGDON AND OXFORD FRINGE SUB-AREA

3.1 The Framework states that for a Local Plan to be sound on the basis that it is “**Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*”

3.2 This Response finds that the Plan is not ‘sound’ - it is not justified as being ‘the most appropriate strategy’ in three respects:

- it is an inappropriate strategy by wholly excluding sites in the Green Belt area of the AOF Sub-Area regardless of sustainability, and disregards the evidence base for the Plan
- the proposed sites are not the most appropriate, PVLP2 has disregarded sustainability, viability and deliverability of the sites identified
- as a consequence, either more sites are required to satisfy needs or alternative sites are required to achieve a more sustainable strategy

3.3 This section of the Response critically examines the selection of additional sites in the AOF Sub-Area.

3.4 PVLP2 Policies 4a and 8a make provision for new sites in the AOF Sub-Area with a housing capacity of 2,020 as follows<sup>7</sup>

Site name	No. of homes
North West East Hanney	80
East of East Hanney	50
East of Kingston Bagpuize with Southmoor	600
South East Marcham	90
Dalton Barracks	1,200
Total	2,020

<sup>7</sup> extracted from Core Policies 4a and 8a



3.5 It seems clear that sites have been selected principally on the basis that they are beyond the Oxford Green Belt (except for Dalton Barracks, which is a brownfield site). This is not made explicit and certainly the SA/SEA<sup>8</sup> only introduces 'Green Belt' as a landscape criterion in Table 4.1 objective 8, which is erroneous as it has a quite different purpose.

3.6 The Housing White Paper (**HWP**) has introduced a new test for allocating sites in Districts with a Green Belt (emphasis in bold):

*"Step 1 ... Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances **when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements**"<sup>9</sup>*

3.7 Topic Paper 2 certainly examines some Green Belt and non-Green Belt sites, and rejects all but one (Dalton Barracks) of the former. It selects five non-Green Belt sites but without explicitly assessing them as 'reasonable options' to the Green Belt sites. Certainly, the Radley South site is more sustainable than the non-Green Belt sites, but it is merely the fact that it is in the Green Belt that causes its rejection. Essentially, the exercise is to reject sites which may be in the Green Belt against acceptance of less sustainable sites outside it, without actually saying so. This fails to meet the HWP test.

3.8 It is entirely unclear in PVLP2 and the supporting papers how the sites on this list or the capacities were arrived at. Without any explanation PVLP2 Core Policy 4a sets out a list of sites and capacities. Paragraph 2.44 merely states as follows:

*The Part 2 plan allocates five additional sites within the Abingdon-on-Thames and Oxford Fringe Sub-Area to ensure this revised housing requirement is 'fully' met. Land is allocated in the Part 2 plan at the sustainable larger village of Kingston Bagpuize with Southmoor (within Fyfield and Tubney Parish), at the MOD base at Dalton Barracks (Shippon) and at the larger villages of East Hanney and Marcham. (Core Policy 8a)*

*With the small footnote "More information about how we have selected the additional site allocations is set out in our Site Selection Topic Paper available from the Council website at: [www.whitehorsedc.gov.uk/LPP2](http://www.whitehorsedc.gov.uk/LPP2)"*

<sup>8</sup> Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan Part 2, SA Report Sept 2017

<sup>9</sup> HWP February 2017 p10

- 3.9 Apart from Fig 2.2 showing the 5 sites in CP4a/8a at a very small scale, the only site plans are contained in a supporting document Topic Paper 2 Site Selection Appendix B October 2017. Surely, they should be identified on a proposals map, as Dalton Barracks is.
- 3.10 Topic Paper 2 (October 2017) 'Site Selection' is the appropriate document. In the March 2017 Topic Paper at Stage 3, 30 sites were identified which make up the shortlist at Appendix A. These do not include, as 'strategic sites' the PVLP2 sites of North of East Hanney (80 homes), North-East of East Hanney (50) or South-East Marcham (120 homes). But Radley South is included as a strategic site.
- 3.11 The red-amber-green (**RAG**) scoring for four of the five PVLP2 sites and the Radley South site shows no clear differences but demonstrates that the Radley South site was essentially rejected because it is in the Green Belt (as is Dalton Barracks but this is classed as previously developed land') whereas the others are not, except the brownfield Dalton Barracks.
- 3.12 The "key consideration" is that the sites should be "*well located and accessible to Oxford*" (emphasis in bold):

*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**.<sup>10</sup>*

- 3.13 There can be no disagreement that Radley South easily fulfils that "key consideration" whereas sites 2, 3, 4, 5 (Fig 2.2) do not.

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<sup>10</sup> Topic Paper 2 Site Selection Oct 2017 para 3.15

## 4.0 ANALYSIS OF THE IDENTIFIED SITES IN PVLP2

4.1 This Section concentrates on the sites identified in PVLP2 for the AOF Sub-Area.

### **North of East Hanney - 80 homes**

4.2 The site is identified in the PVLP2 Appendix at p24 and referenced EHAN\_C in Topic Paper 2 Appendix 2b.

4.3 East Hanney is some 16km distant from Oxford with only road access (A338), and no rail access, available. It is described in the original Topic Paper 2 (March 2017) as being *“relatively remote from Oxford and the Science Vale”*<sup>11</sup>. There are *“set to be enhancements to the bus service”* about which TP2 provides no information. It is not a sustainable settlement justifying any expansion.

4.4 The *“Wantage waste water treatment works is above capacity ... is unlikely to cope with increased demand and reinforcement in the sewers would be required”*<sup>12</sup>. This raises concerns about deliverability and viability of this small site.

4.5 Sites at East Hanney and Marcham were mainly selected (it would seem) because *“they are not located within the Oxford Green Belt”*<sup>13</sup>.

4.6 The LP1 Inspector’s Interim Response raised questions about East Hanney: *“the mobile library service at East Hanney has been withdrawn meaning that, in terms of the findings of the Town and Village Facilities Study (2014), the settlement would no longer be classed as a larger village”*<sup>14</sup>. He requested information from VWHDC, but no response is readily available.

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<sup>11</sup> Topic Paper 2 p63

<sup>12</sup> Topic Paper 2 Appendix 2B October 2017 p27

<sup>13</sup> PVLP2 para 2.47

<sup>14</sup> Vale of White Horse Local Plan 2031: Part 1 Examination - Inspector’s Interim Findings 7.6.16 para 10.1

- 4.7 There must be serious doubt that North of East Hanney is suitable as a sustainable settlement for growth and it is not therefore suitable for inclusion in PVLP2.

**North-East of East Hanney - 50 homes**

- 4.8 The site is identified in the PVLP2 Appendix at p27 and as EHAN\_D in Topic Paper 2 Appendix 2b.
- 4.9 The site should have been rejected at Stage 2 Initial Threshold<sup>15</sup> because sites must have a capacity of at least 50 dwellings, at best this site is on the very limit.
- 4.10 Comments above on the lack of sustainability of East Hanney, its lack of connectivity with Oxford and its location outside the Green Belt equally apply to this site. There must also be doubts about deliverability and viability because of its size but with the need to:

*Water and waste water: The system is above capacity, is unlikely to cope with increased demand and reinforcement to the sewer network would be required.<sup>16</sup>*

- 4.11 The North-East of East Hanney site is not suitable for inclusion in PVLP2.

**East Kingston Bagpuize with Southmoor - 600 homes**

- 4.12 This is identified in PVLP2 Appendix p17 and KBAG\_A in Topic Paper 2 Appendix 2b. The 600-home site is located next to the 280-home site of LP Pt1 Policy CP 4 and 8. Kingston Bagpuize is a village with a population of 2,349 and 935 households<sup>17</sup>. It seems an unsustainable and unlikely location for doubling its size with a further 880 dwellings.
- 4.13 East Kingston Bagpuize with Southmoor is some 14 km from Oxford, without any rail access.

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<sup>15</sup> Topic Paper 2 Table 3.1 p10

<sup>16</sup> Topic Paper 2 Appendix B p29

<sup>17</sup> Census 2011 Summary Vale of White Horse

4.14 The East Kingston Bagpuize with Southmoor site is not suitable for inclusion in PVLP2.

#### **South-East Marcham - 90 homes**

4.15 The site is identified in PVLP2 Appendix at p21 and as MRCM\_B in Topic Paper 2 Appendix 2b.

4.16 This Marcham site scores many 'yellows' in Topic Paper 2 Appendix 2b pp55/56 including impact on a SAC and SSSIs, traffic, sewerage capacity, school capacity, high voltage line crossing the site and proximity to Air Quality Management Area<sup>18</sup>.

4.17 It is not a sustainable location but PVLP2 para 2.47 highlights that Marcham's main attribute is that it is *"not located in the Oxford Green Belt"*.

4.18 Marcham is not on a railway line with a station. The high amber score for factors for landscape, ecology, transport, water and waste water, and environmental health suggest that this is not a sustainable site, and should not be identified in PVLP2 CP4a and 8a.

#### **Dalton Barracks - 1,200 homes**

4.19 This is the only site which is mapped (with a key) and detailed in the PVLP2 itself (pp 33 -36). It is also shown in PVLP2 Appendix at p13 and SHIP\_Ain Topic Paper 2 Appendix 2b (p65)

4.20 The site was identified for disposal in 'A Better Defence Estate' published by the Ministry of Defence in November 2016. Unfortunately, the date for disposal is stated to be "2029"<sup>19</sup>. A 'reprovision plan'<sup>20</sup> to relocate 2 of the military units using the site

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<sup>18</sup> see also PVLP2 para 2.48

<sup>19</sup> 'A Better Defence Estate' p24

<sup>20</sup> a term used in the 'Defence' document which seems to mean 'relocate'

has still not yet been confirmed, although VWH considers that *“it is anticipated that the military units will be re-located no later than 2026”*<sup>21</sup>.

4.21 Assurances, unsupported by evidence, that the site will be ‘available’ before 2029 are given as follows:

- *Other issues raised include a lack of existing infrastructure; uncertainty if the site will become available in the plan period... Following discussions with the Defence Infrastructure Organisation (DIO), the Council understands that the site is available for development within the plan period and that development can proceed, even before the Army Regiment currently location [sic] on-site is relocated. (Topic Paper 2 Appendix 2b p67)*
- *One of the sites identified for release, originally by 2029, is Dalton Barracks, located within the Vale of White Horse District to the west of Abingdon-on-Thames and close to Oxford. Dialogue between the Defence Infrastructure Organisation (DIO) and the District Council has identified an opportunity to release the site sooner than 2029 and the Council is satisfied that 1,200 homes can be delivered on the site within the plan period up to 2031. (PVLP2 para 2.53)*

4.22 This is the identical wording, which is stated to be no more than *“an opportunity”*, to that given in the Preferred Options version in March 2017, to which GPL and others raised concern. For such a large site which is critical to the housing delivery of the Local Plan it seems incredible that nothing further seems to have happened in seven months, and the PVLP2 has been published on the basis of apparently verbal exchanges that there is ‘an opportunity’ but without any robust evidence.

4.23 PVLP2 Appendices (p13) mentions two documents, neither of which are available:

*To deliver an exemplar, sustainable, mixed use community that reflects ‘Garden Village’ principles and follows a comprehensive development framework approach in accordance with Core Policy 8b: **Dalton Barracks Comprehensive Development Framework and Supplementary Planning Document for Dalton Barracks***

4.24 In October 2017 Vale of White Horse/South Oxfordshire DC’s published the ‘Housing Delivery Strategy’. Dalton Barracks is a key, but difficult, site which is not mentioned in the Strategy, so clearly no assistance is envisaged on delivery. In response to the GPL

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<sup>21</sup> PVLP2 para 2.54

submissions on this point an email from Principal Development Officer stated that *“the aim of the draft Joint Housing Delivery Strategy is to work alongside Vale’s Local Plan 2031 Pt 2 with a focus on general delivery of new build homes and is not site specific.”* I pointed out that cannot be so because Didcot Garden Town and Berinsfield are mentioned several times.

4.25 In July 2017 VWHDC issued a press release stating that *“Building work on the long-awaited Grove Airfield development could get underway soon”*. It says that outline planning permission has finally been granted. It will require further approval of reserved matters (another year?) before ‘building work’ can start. My research has found that:

- the former airfield closed in 1947
- the site was allocated (Policy H1) In the Draft Oxfordshire Structure Plan in 2003
- the site was allocated for development in the Adopted Local Plan adopted in July 2006
- the outline planning application (P12/V0299/0) was submitted in February 2012
- this was considered by the Planning Committee in 2013
- Outline consent was granted in July 2017

This is not only 70 years after the airfield closed, but more importantly 14 years after it first appeared in a planning policy document and 5 years after submission of the planning application.

4.26 AWEL has experience of the timescale for developing MoD land because of development land interests around Leighton Linlade, Bedfordshire. **RAF Stanbridge** is a former MoD site in southern Leighton Linlade which was declared “no longer required” in 1991<sup>22</sup>, and the latest CBC Trajectory<sup>23</sup> is that material development will not commence until 2017/18 - a total of 26 years. The stages have been as follows:

date	stage	
July 1990	Govt ‘Options for Change’ Response	considered future of Armed Forces

<sup>22</sup> Post-Options Restructuring of Support (PROSPECT) MoD March 1991

<sup>23</sup> CBC Annual Monitoring Response 2015/16 Dec 2016

March 1991	MoD 'Post-Options Restructuring of Support'	<b>RAF Stanbridge declared 'no longer required'</b>
11 November 1992	Local Plans Working Party Response of Management Group	reference to MoD letter to the Council formally notifying that RAF Stanbridge is to close.
March 1993	S Beds LP Deposit Draft	Large part of RAF Stanbridge allocated for residential development.
5 December 1995	South Beds Local Plan adopted	Includes the allocation of RAF Stanbridge for residential development.
March 1994		part vacated
August 1994		MoD announced that whole of RAF Stanbridge is to close by turn of the century, until then only a small part to remain in use by RAF
December 1996	CBC 'Guidelines for Development of RAF Stanbridge' adopted	
1999	CB Deposit Draft Review Local Plan	RAF Stanbridge included as Site 13
January 2004	CBC Review Local Plan adopted	previously identified RAF Stanbridge became 'Site 13' with capacity 422 homes
10 March 2014	Outline Planning Permission granted, S106 agreed	ref CB/13/02569 housing number now reduced to 175 homes
10 February 2015 - 29 April 2016	Reserved matters approved	ref CB/14/04336
15 September 2015	Variation to S106 agreed	
December 2016	CBC Annual Monitoring Response 2015/16	material development projected to <b>commence in 2017/18</b> - previous versions show 2014/15, 2015/16, 2016/17

4.27 In any event, there would be a start-up period for Dalton Barracks after release by the MoD which can be assumed to be at least 2 years: for a sale to be agreed, planning permissions obtained, contamination remediation and pre-development infrastructure provision. This means that any housing is most unlikely to be delivered until 2031 which is the very end of the plan period.

4.28 There is also concern about the lack of firm proposals for the provision of infrastructure (also mentioned in TP2 Appendix 2b quoted above), including highways and transportation. PVLP2 (para 2.59 - 2.61) refers to:

*2.59 working in partnership with Oxford CC to plan for substantial highway and public transport improvements within this Sub-Area. Plans include provision for upgrading the **A34 interchange at Lodge Hill**; a **northbound bus lane between Lodge Hill and the Hinksey Hill interchanges on the A34**; and providing for **two new Park and Ride sites at Cumnor and Lodge Hill** (both close to Dalton Barracks)*



*for accessing Oxford. Both of these Park and Ride sites will be connected to key destinations in Oxford City **via a Rapid Transit System.***

*2.60. An Abingdon – **Oxford Corridor Sustainable Transport Study** has informed the sustainable transport provision which should support the proposed development at Dalton Barracks. The improvements outlined in the study include the **provision of a bus and cycle link from Dalton Barracks to the new Park and Ride site at Lodge Hill**, which would provide a direct link from the proposed development to an interchange with services going in to the centre of Oxford and to other key destinations, such as the employment sites to the east of Oxford. The study also outlines the need for **enhancements to the frequency of bus routes** serving the site to reach ‘turn up and go’, or premium route, standard and **improved pedestrian and cycle links** from the site to Abingdon-on-Thames.*

*2.61. The Council will continue to work with Oxfordshire County Council to ensure opportunities for public transport, walking and cycling in this area are maximised and are fully integrated with proposals for Dalton Barracks.*

4.29 This is a substantial wish list of infrastructure which is obviously critical to the delivery of Dalton Barracks, but apart from ‘working closely’ supported by ‘studies’ there is no mention of firm proposals or any kind of public funding. Any financial contribution from the Dalton Barracks development (1,200 dwellings) is very unlikely to fund much of this ‘wish list’.

4.30 At the VWHDC Scrutiny Committee 20.9.17 the following points were raised and minuted:

*Councillor Emily Smith:*

*The transport infrastructure was inadequate to support the proposed Dalton Barracks development; and*

*The proposed Lodge Hill Park and Ride was currently unfunded, was a low priority for the County Council and would not be operational before 2026. However, once operational, it would encourage commuters to drive to and from the Park and Ride rather than use public transport.*

*In response to these comments, the Cabinet member and officers stated that:*

*The Local Plan was a strategic document. **Details of supporting infrastructure, including traffic management measures for Dalton Barracks and other sites would be considered as part of any planning application and S106 agreement; and The main public transport links for the Dalton Barracks development would be via the existing bus services.***

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- 4.31 These comments seem to suggest that actual provision of infrastructure is almost seen as a ‘detail’ that can await a planning application rather than to be a matter to be resolved before such a major site could be included in the Local Plan.
- 4.32 The delivery of Dalton Barracks in VWH PVLP2 is therefore put no higher than an ‘opportunity’ with no other published timescale except disposal by the MoD in 2029. It is entirely unexplained in PVLP2, or anywhere else, how the site is expected to make any meaningful contribution to housing supply within the plan period, much less how 1,200 homes could be completed. Clearly no contribution is remotely possible within a 5-year housing land supply period and is extremely doubtful for any part of the plan period.
- 4.33 The provision of essential highways and transportation infrastructure has only reached the stage of a ‘wish list’ and mention of ‘working with Oxfordshire CC’ informed by ‘studies’. There is no mention of the detail necessary or the provision of funding required to actually have confidence that this essential infrastructure will be available as an integral precursor to the development of the site.
- 4.34 Without this confidence in infrastructure provision, and in the absence of a clear and justified timetable for delivery of the site, Dalton Barracks cannot be included in PVLP2.
- 4.35 The paucity of appropriate sites to meet the VWHDC’s housing targets does therefore suggest that the exceptional circumstances do exist for more sustainable and deliverable Green Belt sites to be given proper consideration as part of the PVLP2 review.

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## 5.0 THE EXCLUSION OF RADLEY SOUTH

### Need for inclusion of Radley South

- 5.1. The shortfall in housing numbers has been identified in Section 2 above. There is criticism of the sites identified in the Abingdon and Oxford Fringe Sub-Area in Sections 3 and 4. As explained in Section 4, there is no robust evidence that the Dalton Barracks site will deliver the 1,200 homes proposed in the PVLP2 in the plan period.
- 5.2. As a consequence, the Plan would be unsound unless additional or alternative sites are identified, and the 'exceptional circumstances' do exist to release Green Belt sites. Radley South is a strong proposal, for all the reasons set out below, and will deliver some 240 homes in a sustainable location which will serve the needs of Oxford as well as the District.

### The Sustainability of Radley

- 5.3. Radley is an acknowledged sustainable settlement which is entirely suitable for making a meaningful contribution to the housing shortfall in the AOF Sub-Area and the unmet needs of Oxford.
- 5.4. Radley is described as *"one of the Vale's most sustainable villages with a good range of services and facilities, and is close to additional facilities in Abingdon-on-Thames"*<sup>24</sup>. Radley is a sustainable settlement served by a main line railway station (Oxford - 10 minutes, Didcot - 8 minutes and Paddington - 1hr 25 minutes) and a good bus service (Oxford and Abingdon). It is acknowledged in the VWHDC Cabinet Response (7.8.15) that Radley is rightly described as one of the *"most sustainable larger villages"* having *"excellent public transport links to Oxford, with a railway station"*. This was endorsed

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<sup>24</sup> Draft Local Plan Supporting Paper Feb 2014 p34

by the LP Part 1 Inspector: Radley is “a ‘larger’ village with local services, including a station with direct trains to Oxford, Didcot and London”<sup>25</sup>

5.5. NPPF para 14 provides the Government position:

*At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking....*

5.6. Core Policy 8 of the LP1 identifies the main settlements in the Abingdon and Oxford Fringe Sub-Area as follows:

*Market Town: Abingdon-on-Thames*

*Local Service Centre: Botley*

*Larger Villages: Cumnor, Drayton, East Hanney, Kennington, Kingston Bagpuize with Southmoor, Marcham, Radley, Sutton Courtney, Steventon and Wootton*

5.7. The Officer’s Response to Cabinet (7.8.15) noted the *most sustainable larger villages*:

Cumnor

Kingston Bagpuize with Southmoor

Radley

Wootton

### **LP1 Inspector’s Response**

5.8. Regarding the sustainability of Radley, the LP1 Inspector said in his final Response (emphasis added in bold)<sup>26</sup>:

***As a ‘larger’ village with local services, including a station with direct trains to Oxford, Didcot and London**, there is little to support the argument that Radley could not appropriately accommodate the 240 or so dwellings envisaged for Site 4.*

5.9. The LP1 Inspector also expressed views on likely settlements suitable for sustainable growth in his Interim Response<sup>27</sup>:

<sup>25</sup> Inspector’s Final Response 30.11.16 para 83

<sup>26</sup> LP Part 1 Inspector’s final Response para 83

<sup>27</sup> Inspector’s Interim Findings 7.6.16

[other villages in the AOF Sub-Area] *would not be a sustainable location to provide for the majority of the sub-area's housing requirement, most of which is likely to arise from people currently living in **Abingdon, Botley, Radley and Kennington***<sup>28</sup>.

*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***<sup>29</sup>.

*It is the desirability of providing for housing needs in the Abingdon-on-Thames and Oxford Fringe sub-area, in **close proximity to Abingdon and Oxford City**, that is **fundamental to my conclusion that exceptional circumstances exist to justify removing from the Green Belt the sites [the Part 1 sites] indicated above.***<sup>30</sup>

*However, in addition, the plan proposes to delete from the Green Belt some 15 or so other parcels of land at **Botley, Chawley, North Hinksey, Cumnor, Wootton and Appleton**; land which would **not be allocated for any particular use***<sup>31</sup>

*it **cannot reasonably be argued** that deletion of land from the Green Belt at **Botley, Cumnor, Wootton and Appleton** would be necessary to ensure logical, defendable and permanent Green Belt boundaries at Abingdon, Radley and Kennington*<sup>32</sup>.

*I am therefore **unconvinced** by the confidence expressed by the Council at the hearings that the land proposed to be deleted from the Green Belt at **Cumnor, Botley, Appleton and Wootton** would be sufficient to provide for the yet to be allocated Vale's own housing needs*<sup>33</sup>

***the exceptional circumstances** necessary to justify removing from the Green Belt the parcels of land at **Botley, Cumnor, Wootton and Appleton do not exist***<sup>34</sup>

*I conclude that the **exceptional circumstances** necessary to remove **Farmoor** from the Green Belt **do not exist**.*

*several other parcels of land at Abingdon, Kennington and Radley are proposed to be deleted from the Green Belt but not allocated for any purpose. In terms of the land at Abingdon and Kennington I can see some sense in its removal from the Green Belt, in the context of the removal of housing sites 1,2,3 and 4 and the desirability of producing logical and permanent Green Belt boundaries. **I also note***

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<sup>28</sup> ditto para 8.2

<sup>29</sup> ditto para 8.1

<sup>30</sup> ditto para 8.4

<sup>31</sup> ditto para 8.4

<sup>32</sup> ditto para 8.5

<sup>33</sup> Inspector's Interim Findings 7.6.16 para 8.8

<sup>34</sup> ditto para 8.10

***that there is potential for housing development on the land at Radley, although, as detailed in section 13 below, there is not an identified need for this at the present time<sup>35</sup>.***

***Given the prospect of a further Green Belt boundary review, permanence of the submitted plan's Green Belt boundary at Abingdon, Kennington and Radley cannot currently be guaranteed. It would therefore make sense to retain these parcels of land in the Green Belt until either a further Green Belt review has taken place or there is some certainty that such a wider review will not be necessary.<sup>36</sup>***

### **Green Belt Release**

5.10. The version of the Local Plan Part 1 which was submitted to the Secretary of State included proposals for several sites to be released from the Green Belt including Radley South in addition to the four that were eventually allocated for development. These are identified in the VWHDC submission to the Examination<sup>37</sup>. The Inspector concluded that there was little merit for the sites at Botley, Cumnor, Wootton, and at (smaller villages) Appleton and Farmoor.

5.11. The Inspector's Response rejected the release from the Green Belt of all 18 sites identified in the Submission Plan because no development proposals were made and the 'exceptional circumstances' had not been demonstrated. However, he said:

***Retaining these parcels of land in the Green Belt now **would not prevent their deletion from Green Belt through the 'Part 2' plan** or any other local plan or local plan review, **if the necessary exceptional circumstances were to be demonstrated.*****<sup>38</sup>

5.12. That is now the position: Oxford's unmet housing needs have been calculated which, when added to the existing shortfall, now present the grounds for releasing further land for housing development. The LP1 Inspector's Response also said<sup>39</sup>:

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<sup>35</sup> ditto para 8.13

<sup>36</sup> ditto para 8.13

<sup>37</sup> Appendix 3

<sup>38</sup> Inspector's Final Response 30.11.16 para 91

<sup>39</sup> ditto para 100

*However, given the prospect of a further Green Belt boundary review, **permanence of the submitted plan's Green Belt boundary at Abingdon, Kennington and Radley cannot currently be guaranteed. Indeed, there is interest in developing some of this land for housing to assist in contributing towards Oxford city's unmet housing needs, although this remains a matter for the 'Part 2' plan.** It would therefore make sense to retain these parcels of land in the Green Belt until either a further Green Belt review has taken place or there is some certainty that such a further review will not be necessary.*

- 5.13. The 'exceptional circumstances' now exist for the Green Belt boundary to be amended with the allocation of Radley South in PVLP2.

## The Case for Radley South

### Introduction

- 5.14. The merits of the Radley South site were noted by the LP1 Inspector as having *"potential for housing development"*.<sup>40</sup>

- 5.15. TP2b states<sup>41</sup>

*Well linked to Oxford, given a train station, with good public transport and cycling connections. Well related to the larger village of Radley,*

*although an open landscape in the Oxford Green Belt that contributes strongly to Green Belt purposes and is highly sensitive in landscape terms (see landscape and Green Belt comments below)*

*Radley has a rail station (30 mins max frequency), and current allocated development may lead to a 4/hour bus service. Radley is within easy cycling distance of Oxford, Abingdon-on-Thames and Culham. Well related to the larger village of Radley, and existing bus stop.*

- 5.16. Radley South was identified for Green Belt release in the Submission version of LP1, although the Inspector stated that whilst none of the GB release sites should be allocated for development, that position should be reviewed in LP2. It was recommended for Green Belt release in the Vale of White Horse District

<sup>40</sup> Inspector's Interim Response 7.6.16 para 8.13

<sup>41</sup> TP2 Appendix 2b p61

Council/Kirkham Landscape Planning Ltd Green Belt Review Phase 3 Response  
(February 2014), identified as site 14<sup>42</sup>. Comments in the Kirkham Report on the  
Radley sites are:

- *Key landscape characteristics contributing to the adjacent Green Belt: No significant features.*
- *The new boundary of Area 14 follows open farm tracks.*

### **Landscape**

5.17. TP2 2b states as follows<sup>43</sup>:

*There is no defined boundary to the south and west, leaving it exposed to views from the immediate and wider landscape.*  
*Thames Path National Trail potentially leads to sensitivities.*

5.18. Radley South has a clear boundary to the west which is Thrupp Lane. Landscaping to the west, south and east (although the railway runs some 120m to the east) will establish clear boundaries and screen the site from those directions.

5.19. The site is a flat with very little vegetation and extensive planting, including boundaries, would enhance its character and define the urban area. It lies within unremarkable landscape and a natural southern extension to Radley between Thrupp Lane and the Oxford railway. New peripheral planting would frame and define the extended Radley urban area, as recommended by Kirkham. The site is not within any designated or recognised landscape area. The Kirkham Response recommended:

*Area 14 is an open landscape. Particular care needs to be taken to enclose the area in substantial tree belt and woodland planting to ensure that any new built form does not have an adverse impact on the open character of the adjacent Green Belt.*

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<sup>42</sup> Appendix 2 Vale of White Horse District Council/Kirkham Landscape Planning Ltd Green Belt Review Phase 3 Response (February 2014) extract

<sup>43</sup> TP2 Appendix 2b p61



- 5.20. Whatever the TP2b sentence means, the Thames Path National Trail is at least 1.4 km to the south of the site, so the development of Radley South cannot possibly affect the Trail's enjoyment.

### **Historic Environment**

- 5.21. TP2b states as follows:

*Situated between the Settlement Sites "North of Wick Hall" Scheduled Monument and "East of Goose Acre Farm" Scheduled Monument. It is possible that nationally significant archaeological remains extend into the proposed site, and the intervisibility between the sites may be of significance. Historic England consider it likely that development of this site would be harmful to the significance of the Monuments.*

- 5.22. Historic England's comments are not recorded in Local Plan 2031 Part 2 Consultation Statement Appendix 3. Neither of the Inspector's Reports on LP1, when the Radley South site was examined, mention the Historic England comments.
- 5.23. The two SAMs do not constrain development of the site. Even though it is only "possible" that remains extend into the site, their status has been examined and was referred to in the original Design Concept<sup>44</sup> for the site as follows:

*There are two Scheduled Ancient Monuments (SAM) located to the east and west of the site. Both are entirely sub-surface archaeological remains of former settlements visible only as cropmarks. The SAM to the east is known as the Settlement East of Goose Acre Farm. The entry in the Oxfordshire Historic Environment Record states that it is a *cropmarked complex of ditches and enclosures...probably Bronze Age like others in the vicinity. cursory trawl of arable produced no surface material. No features but flints recovered during watching brief. Romano-British pottery found in large quantities... a watching brief recovered Romano-British and post medieval pottery and ceramic building material along with prehistoric worked flints. A multi-phase series of ditches and pits, apparently part of Romano-British settlement was also encountered. Condition Report in 2009 as extensive significant problems i.e. under plough, collapse and the trend declining. Principal vulnerability is arable ploughing.**

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<sup>44</sup> Site at Gooseacre Farm, Thrupp Lane, Radley. Prepared for Arnold White Estates Ltd. by Built Form Resource Ltd August 2014

The asset to the west is the Settlement Sites N of Wick Hall and the description is similar to that for the site East of Goose Acre Farm.

Development of the Gooseacre Farm site would not result in any harm to these assets.

- 5.24. The conclusion is that these are entirely sub-surface archaeological remains of former settlements only visible as cropmarks and that development of the site would not result in any harm. There is no evidence that the underground archaeology extends under Radley South. If there was, the site would have been included in the original designation.

### **Access**

- 5.25. TP2b states

*Access could be provided via Thrupp lane, although significant off-site infrastructural improvements would likely be required.*

- 5.26. Access would be via Thrupp Lane which will be improved, connecting to the new roundabout junction for Whites Lane, Foxborough Road and Thrupp Lane as described in the emerging Neighbourhood Plan<sup>45</sup>. Pedestrian and cycle access can be provided through the existing residential area as shown in the Concept Plan (Appendix 2).
- 5.27. The site is well located for access by sustainable transport, Radley having an excellent bus and train service both in easy walking and cycling distance from the site. This would be compliant with LP1 Core Policies 33 and 35.
- 5.28. Buses depart to Oxford every 15 minutes<sup>46</sup> and direct trains every hour throughout the day - both modes which Radley South can access on foot and cycle. The site offers the potential to make up some of Oxford's shortfall and sustain its economic viability by providing homes for Oxford workers which will not require them to

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<sup>45</sup> Second Consultation Draft September 2017 NP pp 38,39

<sup>46</sup> The no. 35 service

commute by car on the roads and will not add to the parking pressure within Oxford itself. Very few other potential sites of this size offer that connectivity.

- 5.29. AWEL commissioned an expert report by Stuart Michael Associates which has previously been submitted to VWHDC<sup>47</sup>. The SMA report demonstrates that Thrupp Lane is able to be widened and improved to provide adequate access to the development.
- 5.30. The SMA report also deals with the 'Public Rights of Way' impact. It shows that the cycle and pedestrian links which serve Radley will actually be improved as part of the development. The site directly accesses the Sustrans National Cycle Network (Route 5) which is a positive advantage.
- 5.31. Improvements to cycle and pedestrian links would be of benefit to Radley generally:

*Pedestrian and cyclist links can be provided to Gooseacre. There is also scope to significantly enhance the cycleway network. A shared footway/cycleway from the site's eastern boundary across the promoter's land to the east and link to its access onto Bowyer Close*

*This would provide an attractive recreational corridor and also provide a convenient link for railway commuters to and from the proposed development. Bowyer Close also connects to Stonhouse Crescent and from there to Foxborough Road and Radley railway station.*

*The shared footway/cycleway would effectively provide a connecting route to the National Cycleway Route 5 on Thrupp Lane. Consideration could also be given to making up a track that runs north – south from Bowyer Close to Foxborough Road.<sup>48</sup>*

- 5.32. The Appraisal demonstrates that the existing junction from Thrupp Lane onto Foxborough Road is perfectly adequate for the increased traffic envisaged, although improvements have now been put forward in the NP. Indeed, the development of

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<sup>47</sup> Site at Gooseacre Farm Thrupp Lane, Radley. Prepared for Arnold White Estates Ltd. & B. Colton (the Co-Promoters) by Stuart Michael Associates Limited December 2014

<sup>48</sup> Appendix 3 SMA Response paras 2.11 - 2.13

Radley South clearly benefits accessibility around the village, in particular for cyclists and pedestrians.

### **Public Services**

5.33. TP2B states:

*Radley CE Primary School would need to expand from its current 0.5 form entry size.*

*It is important to consider the cumulative impacts of combinations of sites in the vicinity of Abingdon-on-Thames – both in the Vale of White Horse and South Oxfordshire - for secondary school planning. If the cumulative impacts of new sites on top of already planned growth trigger a need for a new secondary school, sufficient sites should be allocated in the area to provide sufficient mass for a viable new secondary school.*

5.34. There is no problem with expanding the primary school, which is already envisaged for the Radley North-West development.

5.35. The allocation of Radley South would therefore be a positive for provision of extra secondary schooling by adding to ‘sufficient mass’.

### **Environmental Health**

5.36. TP2b states

*Possible contaminated land (plastic works formerly lies adjacent to part of the site).*

5.37. There is no evidence of contamination. The actual site of the former works has already been developed for residential use with no problems found.

### **Green Belt**

5.38. TP2 2b states as follows<sup>49</sup>:

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<sup>49</sup> TP2 Appendix 2b p62

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*The site contributes to the overall aims and purposes of the Oxford Green Belt and any development within the site would harm the integrity of the wider Oxford Green Belt.*

- 5.39. This comment is a general one which has been made against all the Green Belt sites in Appendix 2b, it is not specific to Radley South.
- 5.40. However, the Kirkham Report (commissioned by VWHDC) recommended that the site be released from the Green Belt, so disputing Appendix 2b on the nature and character of this specific site.

### **Benefits**

- 5.41. Radley South, with a gross area of some 8.6ha gross, 7.9ha net could accommodate some 240 homes<sup>50</sup>.
- 5.42. There would be other benefits to offer the community: a new site to the east of Radley South of a size suitable to relocate and build a new Village Hall, and make provision for pitches, cricket ground, allotments, children's play area etc. as shown on the Concept Plan (Appendix 2). This would help to resolve some of the issues identified in the emerging Neighbourhood Plan. The availability of the current Village Hall site for development could enable Radley College to fund the new building and provision of the facilities.
- 5.43. Additional funding, doubling that from Radley NW, could contribute to items including the Radley Lakes proposal in the Neighbourhood Plan and to education provision. There is also a possibility of land being made available to implement the proposed connection to Audlett Drive, also a desired outcome identified in the Neighbourhood Plan.

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<sup>50</sup> LP Pt1 Core Policy 23 requires a minimum density of 30 dwellings per ha

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## **Delivery**

- 5.44. The site is in single ownership and obviously deliverable in the short-term. If the allocated Radley NW site were developed in tandem it would be possible to align S106 Agreements to include contributory funding/provision to benefit Radley, rather than a two-stage approach where such arrangements would be disjointed over time. Also, Radley NW may perceive it to be an unfair burden if it has to fund everything knowing that Radley South would later be developed. If the sites are developed in tandem, then proper provision can be made from the outset.

## **Conclusion**

- 5.45. The Radley South Site should be identified in LP2. It has clear development potential and the 'exceptional circumstances' now exist for its release from the Green Belt. It was recognised by VWHDC as being suitable for release from the Green Belt in the LP Pt 1 submission, supported by the Kirkham study, and is relatively free from constraints. It is well connected by public transport (train and bus) thus reducing travel by car which is a principal theme of the Plan. It is well located to make a contribution to Oxford's unmet housing needs and can deliver housing quickly so contributing to the 5-year housing land supply. It was recognised by name by the LP1 Inspector as being "suitable for development". Concerns about transportation and access, the SAMs and capacity<sup>51</sup> have been addressed. The site can make a valuable and early contribution to District housing land supply and to the unmet housing needs of Oxford.

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<sup>51</sup> Radley South was only excluded by VWHDC from LP1 because it thought (erroneously) that the site capacity was below 200 homes

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## 6.0 CONCLUSION

### Soundness

- 6.1. This Response is the response to the consultation on the Local Plan Part 2 Detailed Policies and Additional Sites, Publication Version October 2017 (PVLP2). This Response submits that PVLP2 in its present form **is unsound** when assessed against the tests in the National Policy Planning Framework<sup>52</sup> (**NPPF**).
- 6.2. This Response provides a fuller and more detailed response to the consultation. The completion of a prescribed form alone would be inadequate for this purpose and there is no legal or other requirement to do so. However, although Appendix 1 to this Response provides the essentially administrative information and brief commentary on the relevant policies, it is intended to be read alongside this more detailed Response.

### Duty to Cooperate

- 6.3. The Duty to cooperate has not been met. PVLP2 relies on its 'apportionment' of 2,200 homes to meet Oxford's unmet need. However, the tentative agreement sought by the Oxfordshire Growth Board now looks in doubt because South Oxfordshire DC's Pre-Submission Local Plan reduces its contribution such that collectively the overall provision is 1,200 homes short. There is no resolution of this problem so that the VWHDC has **failed the Duty to Cooperate** and pressed ahead regardless.

### Housing numbers

- 6.4. The calculation of housing number required is confused between LP1 and LP2. Based on the LP1 CP4 calculations, PVLP2 has a shortfall of 752 homes. PVLP2 seeks to re-write LP1 CP8, which is challengeable in that LP1 was adopted at the end of 2016.

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<sup>52</sup> Framework para 182

Even so, the numbers or arithmetic of PVLP2 CP8a are wrong and a shortfall of 126 homes has been identified in this Response.

- 6.5. Lastly, on housing numbers, the allocated sites in PVLP2 will not sustainably deliver the required housing numbers (see below) so, at best, if these sites do survive their combined contribution should be seen as below 1,000, not 2,020 homes.

### **Conclusion on identified sites**

- 6.6. The sites identified in **Abingdon-on-Thames and Oxford Fringe Area in Core Policies 4a and 8a** lack sustainability and the policies are flawed. They have been selected by a flawed methodology which, in any event, has not been followed. Sustainable sites which may be in the Green Belt have been rejected for unsustainable sites beyond the Green Belt which will not adequately serve the Oxford HMA. Even so, this choice has not been explicitly stated or justified.
- 6.7. NPPF para 182 requires *“the plan to be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence”*. The process of identifying sites and comparing them to ‘reasonable alternatives’ is far too vague, and in many cases undocumented, to justify inclusion in PVLP2.
- 6.8. The site selection process is described at PVLP2 para 2.30 with a footnote referencing ‘Topic Papers’ of which Topic Paper 2<sup>53</sup> is the only one of relevance. It is clear that Green Belt locations have been ruled out automatically in favour of non-Green Belt ones. There is no balancing of site sustainability with Green Belt status. This ‘strategy’ is implicit but not made clear in any of the documents. The process has failed the ‘justified’ test of NPPF para 182 by not properly, or at all, comparing identified sites (individually or collectively) against reasonable alternatives.
- 6.9. The North-East of East Hanney site is a proposal for just 50 dwellings which should have fallen out of the process at Stage 2 Initial Threshold<sup>54</sup> because sites must have a

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<sup>53</sup> Topic Paper 2 and appendices 2a and 2b Site Selection, October 2017

<sup>54</sup> Topic Paper 2 Table 3.1 p10



capacity of at least 50 dwellings, at best this site is on the very limit. South-East of Marcham (90 dwellings) is an unsustainable location for this scale of growth. It lacks adequate transportation links except for private cars. The proposal for Kingston Bagpuize with Southmoor, with the site already identified in LP1 would double the size of this modest settlement which is an unsustainable location and has no railway availability.

6.10. The only site to be properly documented is the Dalton Barracks site. Dalton Barracks is the largest allocation in this Sub-Region, and the biggest site to accommodate Oxford's unmet needs, although with significant doubts about delivery of infrastructure. It is unlikely to deliver any dwellings in the plan period because of its non-availability, so only a small fraction of its hoped for 1,200 homes could possibly be counted upon. Unfortunately, on current evidence, it is unable to make any meaningful (or just any) contribution to housing supply in the plan period, because the only evidence available is that it will not be available until 2029, just 2 years before the end of the plan period. Dalton Barracks is very unlikely to deliver in the short to long term (i.e. within the plan period) and for that reason it too should not be included in LP2, or, at least, not at the scale envisaged.

6.11. The four purposes of PVLP2 are<sup>55</sup>

1. *allocate some further housing sites*
2. *provide all the detailed policies*
3. *how we will support Didcot Garden Town and*
4. *deliver the housing for Oxford that we have agreed to provide in the Vale.*

6.12. It has failed to achieve numbers 1 and 4 and is unsound.

### **Sustainability of Radley and benefits of Radley South**

6.13 Radley is regarded as "*one of the Vale's most sustainable villages with a good range of services and facilities, and is close to additional facilities in Abingdon-on-Thames*"<sup>56</sup> . It

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<sup>55</sup> PVLP2 Foreword p8

<sup>56</sup> Draft Local Plan Supporting Paper Feb 2014 p34

is served by a railway station (Oxford 10 mins, Didcot 8 mins and Paddington 1hr 25 mins ) and a good bus service (Oxford and Abingdon) both within close walking and cycling distance from the site. It follows that it should be a leading location for more growth to serve the Oxford Housing Market Area.

6.14 The criticisms of the Radley South site are unjustified. It is noteworthy that it was originally recommended by VWHDC in the submitted LP1 to be taken out of the Green Belt, based on a detailed assessment commissioned by the Council. It was also specifically identified by name by the LP1 Inspector as being “suitable for development”. The response to the criticisms is:

- the site is not ‘extremely sensitive’ in landscape terms and makes very limited contribution to the Green Belt, as evidenced in the Kirkham Study
- the SAMS on adjoining sites are below ground and development of the site would have no material impact, and there is no evidence to suggest that any features extend onto this site
- access improvements, already proposed by Radley NW and in the Neighbourhood Plan would serve the site well.

6.15 The benefits of the Radley South site are that it would swiftly deliver some 240 homes within the 5-year housing supply period. Other potential benefits include

- provision of a new Village Hall on a new site to the east of Radley South
- provision for pitches, cricket ground, allotments, children’s play area etc. as shown on the Concept Plan (Appendix 2).
- availability of the current Village Hall site for development could enable Radley College to fund the new building and provision of the facilities
- additional funding, doubling that from Radley NW, could contribute to items including the Radley Lakes proposal in the Neighbourhood Plan and to education provision

- possibility of land being made available to implement the proposed connection to Audlett Drive, also in the Neighbourhood Plan.

**6.16 The Radley South Site should be recognised as an allocation site in Core Policies 4a and 8a. The ‘exceptional circumstances’ now exist for the Green Belt boundary to be amended with the allocation of Radley South in PVLP2. Without it, the Plan would be unsound:**

- not positively prepared
- not justified
- not effective
- not in accordance with the requirements of national policy
- not deliver sustainable development



**VWH Publication Version Local Plan Part 2**

**Response on behalf of Arnold White Estates Ltd by Gardner Planning Ltd**

**Appendix 1**

**Representation Form**

## Local Plan 2031 Part 2

Publication Version  
Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing  
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

### 2. Agent's Details (if applicable)

Mr

Geoff

Gardner

Director

Gardner Planning Ltd

Down Ampney

Bendlowes Road

Great Bardfield

Essex

CM7 4RR

07887 662166

[geoff@gardnerplanning.com](mailto:geoff@gardnerplanning.com)

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**Sharing your details:** please see page 3

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## **Part B – Please use a separate sheet for each representation**

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: **20.11.17**

### **Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

### **Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan YES

☐

I would like to be added to the database to receive general planning updates YES

☐

~~Please do not contact me again~~

☐

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

## B1

3. To which part of the Local Plan does this representation relate?		
paragraph	policies	policy map
2.14, 2.22 Table 2.1, 2.43	CP4a and CP8a (1)	
4. Do you consider the Local Plan is:		
legally compliant	sound	complies with DTC
yes	no	no

5. reasons
<p><b>DTC:</b></p> <ol style="list-style-type: none"> <li>1. The Plan fails to recognise that the Oxfordshire Growth Board agreement of September 2016 has not been agreed by South Oxfordshire DC so that there is a shortfall in accommodating Oxford's unmet housing needs of 1,200 homes. The DTC exercise therefore is unresolved, and the Plan cannot assume that its share of 2,200 homes is final.</li> </ol> <p><b>Sound</b> <i>Positively prepared</i></p> <ol style="list-style-type: none"> <li>2. The comparison of the <b>housing figures</b> in LP Pt1 and PVLP2 is confusing.</li> <li>3. PVLP2 does not adequately show how the number of homes to be allocated has been calculated. Paragraph 2.14 states that Abingdon-on-Thames and Oxford Fringe Sub-Area should accommodate an extra 2,200 homes for Oxford's unmet needs "<i>as set out by Core Policy 4a</i>". But that policy has a different number of 2,020 homes.</li> <li>4. District need in the AOF Sub-Area calculated in LP Pt1 CP8 was to allocate 1,790 homes in LP Pt1 plus 722 homes to be allocated in LP Pt2. PVLP2 para 2.14 adds 2,200 homes in the AOF Sub-Area for Oxford's unmet need - a total PVLP2 allocation requirement of 2,922 homes but PVLP2 CP4a allocates just 2,020 additional homes. PVLP2 para 2.22 Table 2.1 is 'VWH LP allocations that are close to and accessible to Oxford' which shows the 4 LP Pt1 sites and adds one site (Dalton Barracks) with 1,200 home capacity.</li> <li>5. East of Kingston Bagpuise is a LP Pt1 site with a capacity of 280 homes. A second site of 600 homes (to the East) is added in PVLP2. Both sites are not now regarded available for 'Oxford's needs'.</li> <li>6. Even if four of the five of the LP Pt 1 sites plus Dalton Barracks represent the 'Oxford' sites (2,860 PVLP2 para 2.22 Table 2.1); and 'District' need is CP4a 820 (without Dalton Barracks) plus Pt 1 East Kingston Bagpuise (280), the total should add up to 4,712 (1790 + 722+ 2,200) but it totals 3,960 (2,860 + 820 +280) - a shortfall of 752 homes.</li> <li>7. Policy 8a seeks to update the LP Pt1 figures, but Pt1 was adopted in December 2016 and the stated purpose of Pt2 (para 1.1 p15) is to identify additional sites and accommodate Oxford's unmet needs. No justification is given (nor is there a new Housing Topic Paper) for re-writing Pt1's Core Policy 8: 'Spatial Strategy</li> </ol>

for Abingdon-on-Thames and Oxford Fringe Sub-Area'. In LP Pt 1 the housing requirement for the plan period was 5,438. PVLP2 para 2.14 adds the 2,200 Oxford unmet need figure so should total 7,638, but CP8a gives the new figure of 7,512 - a shortfall of 126.

8. Compared to LP Pt 1, in PVLP2 completions have gone up (another year added), commitments have correspondingly gone down, windfalls have increased by 68 (28%), although the period has reduced, without explanation. The 5-year housing land supply statement April 2017 has a District figure of 70 p.a. but there is no Sub-Region breakdown.
9. These two policy roots (CP4/4a and CP8/8a) both show a shortfall of either 752 or 126 homes. Greater explanation is required and the justification for PVLP2 to fundamentally amend adopted Pt1 CP4 and 8 policies.
10. **The selection of additional sites** in PVLP2 Policies 4a and 8a is inadequately explained, and Section 4 of the GPL Response critically examines this in detail. The additional sites selected are generally extensions to small, unsustainable settlements which are poorly connected in transport terms, and remote from Oxford. Their only attribute is that they are not in the Green Belt - but the test of sustainability has been failed in the process.
11. The site selection process is described at PVLP2 para 2.30 with a footnote referencing 'Topic Papers' of which Topic Paper 2<sup>1</sup> is the only one of relevance. It is clear that Green Belt locations have been ruled out automatically in favour of non-Green Belt ones. There is no balancing of site sustainability with Green Belt status. This 'strategy' is implicit but not made clear in any of the documents. The process has failed the 'justified' test of NPPF para 182 by not properly, or at all, comparing identified sites (individually or collectively) against reasonable alternatives.
12. The North-East of East Hanney site is a proposal for just 50 dwellings which should have fallen out of the process at Stage 2 Initial Threshold<sup>2</sup> because sites must have a capacity of at least 50 dwellings, at best this site is on the very limit. South-East of Marcham (90 dwellings) is an unsustainable location for this scale of growth. It lacks adequate transportation links except for private cars. The proposal for Kingston Bagpuize with Southmoor, with the site already identified in LP1 would double the size of this modest settlement which is an unsustainable location and has no railway availability.
13. The only site to be properly documented is the Dalton Barracks site. Dalton Barracks is the largest allocation in this Sub-Region, and the biggest site to accommodate Oxford's unmet needs, although with significant doubts about delivery of infrastructure. It is unlikely to deliver any dwellings in the plan period because of its non-availability, so only a small fraction of its hoped for 1,200 homes could possibly be counted upon. Unfortunately, on current evidence, it is unable to make any meaningful (or just any) contribution to

<sup>1</sup> Topic Paper 2 and appendices 2a and 2b Site Selection, October 2017

<sup>2</sup> Topic Paper 2 Table 3.1 p10



<p>housing supply in the plan period, because the only evidence available is that it will not be available until 2029, just 2 years before the end of the plan period. Dalton Barracks is very unlikely to deliver in the short to long term (i.e. within the plan period) and for that reason it too should not be included in LP2, or, at least, not at the scale envisaged.</p> <p>14. In terms of soundness, PVLP2 does not adequately demonstrate how it has met the needs of neighbouring authorities (see DTC above).</p> <p><b>Effective</b></p> <p>15. The housing numbers in the AOF Sub-Area rely heavily on the contribution of Dalton Barracks, which is not supported by the evidence,</p> <p><b>Consistent with National Policy</b></p> <p>16. The identification of the 'key site' of Dalton Barracks is flawed contrary to NPPF para 47 pt 1. See separate submission on Dalton Barracks under policy CP8b.</p>
<b>6. modifications</b>
<p>CP4a should show how an additional 2,922 homes will be delivered in the Abingdon and Oxford Fringe Sub Area, and the evidence that Dalton Barracks will deliver 1,200 homes needs to be more robust (see CP8 response).</p> <p>The Plan should re-visit the selection of other additional sites.</p> <p>Radley South should be added to CP4a and CP8 - see separate Radley South response under CP 4a and CP8a (2) and GPL Response report Section 5.</p>
<b>7. participate</b>
Yes.
<b>8. reasons</b>
<p>To assist the Inspector</p> <ul style="list-style-type: none"> <li>• on this analysis of the shortfall in the housing numbers in the Pt 2 Plan</li> <li>• on the grounds for challenging the selection of additional sites</li> <li>• to make the case for including the Radley South site</li> </ul>

## B2

3. To which part of the Local Plan does this representation relate?		
paragraph	policy	policy map
	CP4a, CP8a (2) <b>Radley South</b>	
4. Do you consider the Local Plan is:		
legally compliant	sound	complies with DTC
	no	no

5. reasons
<p><b>Need for inclusion of Radley South</b></p> <ol style="list-style-type: none"> <li>1. The shortfall in housing numbers has been identified in CP4a and CP8a (1) and GPL Response at Section 2. There are criticisms of the sites identified in the Abingdon and Oxford Fringe Sub-Area in CP4a and CP8a (1) and GPL Sections 3 and 4. As explained in CP 8b and GPL Section 4, there is no robust evidence that the Dalton Barracks site will deliver the 1,200 homes proposed in the PVLP2.</li> <li>2. As a consequence, the Plan would be unsound unless additional or alternative sites are identified. Radley South is a strong proposal, for all the reasons set out below, and will deliver some 240 homes in a sustainable location which will serve the needs of Oxford as well as District needs.</li> </ol> <p>Sustainability of Radley</p> <ol style="list-style-type: none"> <li>3. Radley is an acknowledged sustainable settlement which is entirely suitable for making a meaningful contribution to the housing shortfall of the Abingdon and Oxford Fringe Sub-Area and the un-met needs of Oxford.</li> <li>4. Radley is described as <i>“one of the Vale’s most sustainable villages with a good range of services and facilities, and is close to additional facilities in Abingdon-on-Thames”</i>. Radley is a sustainable settlement served by a railway station (Oxford and Paddington) (Oxford - 10 minutes, Didcot - 8 minutes and Paddington - 1hr 25 minutes) and a good bus service (Oxford and Abingdon). It is acknowledged in the VWHDC Cabinet Response (7.8.15) that Radley is one of the <i>“most sustainable larger village”</i> having <i>“excellent public transport links to Oxford, with a railway station”</i>. This was endorsed by the LP Part 1 Inspector: Radley is <i>“a ‘larger’ village with local services, including a station with direct trains to Oxford, Didcot and London”</i>.</li> </ol> <p>The case for Radley South</p> <ol style="list-style-type: none"> <li>5. The merits of the Radley South site were noted by the LP1 Inspector as having <i>“potential for housing development”</i>.</li> <li>6. Radley South was identified for Green Belt release in the Submission version of LP1, although the Inspector stated that whilst none of the GB release sites should be allocated for development, that position should be reviewed in LP2. It was recommended for Green Belt release in the Vale of</li> </ol>

White Horse District Council/Kirkham Landscape Planning Ltd Green Belt Review Phase 3 Response (February 2014), identified as site 14. The 'exceptional circumstances' now exist for the Green Belt boundary to be amended with the allocation of Radley South in PVLP2.

#### Landscape

7. TP2 2b states as follows :

*There is no defined boundary to the south and west, leaving it exposed to views from the immediate and wider landscape.*

*Thames Path National Trail potentially leads to sensitivities.*

8. There is a clear boundary to the west which is Thrupp Lane. Landscaping to the west, south and east (although the railway runs some 120m to the east) will establish clear boundaries and screen the site from those directions.
9. The site is a flat with very little vegetation and extensive planting, including boundaries, would enhance its character and define the urban area. It lies within unremarkable landscape and a natural southern extension to Radley between Thrupp Way and the Oxford railway. It is flat, and peripheral planting would frame and define the extended urban Radley urban area, as recommended by Kirkham. The site is not within any designated or recognised landscape area. The Kirkham Response recommended:
- Area 14 is an open landscape. Particular care needs to be taken to enclose the area in substantial tree belt and woodland planting to ensure that any new built form does not have an adverse impact on the open character of the adjacent Green Belt.*
10. Whatever the TP2b sentence means, the Thames Path National Trail is at least 1.4 km to the south of the site, so its development cannot possibly affect the Trail's enjoyment.

#### Historic Environment

11. TP2b states as follows:

*Situated between the Settlement Sites "North of Wick Hall" Scheduled Monument and "East of Goose Acre Farm" Scheduled Monument. It is possible that nationally significant archaeological remains extend into the proposed site, and the intervisibility between the sites may be of significance. Historic England consider it likely that development of this site would be harmful to the significance of the Monuments.*

12. Historic England's comments are not recorded in Local Plan 2031 Part 2 Consultation Statement Appendix 3. Neither of the Inspector's Reports on LP1, when the Radley South site was examined, mention the Historic England comments.
13. The two SAMs do not constrain development of the site. Even though it is only "possible" that remains extend into the site,
14. The conclusion is that these are entirely sub-surface archaeological remains of former settlements only visible as cropmarks and that development of the site

would not result in any harm. There is no evidence that the underground archaeology extends under the Radley South site.

#### Access

15. TP2b states:

*Access could be provided via Thrupp lane, although significant off-site infrastructural improvements would likely be required.*

16. Access would be via Thrupp Lane which will be improved, connecting to the new roundabout junction for Whites Lane, Foxborough Road and Thrupp Lane as described in the emerging Neighbourhood Plan . Pedestrian and cycle access can be provided through the existing residential area as shown in the Concept Plan (GPL Response Appendix 2).

#### Public Services

17. TP2B states:

*Radley CE Primary School would need to expand from its current 0.5 form entry size.*

*It is important to consider the cumulative impacts of combinations of sites in the vicinity of Abingdon-on-Thames – both in the Vale of White Horse and South Oxfordshire - for secondary school planning. If the cumulative impacts of new sites on top of already planned growth trigger a need for a new secondary school, sufficient sites should be allocated in the area to provide sufficient mass for a viable new secondary school.*

18. There is no problem with expanding the primary school. The allocation of Radley South would therefore be a positive for provision of extra secondary schooling by adding to ‘sufficient mass’.

#### Environmental Health

19. TP2b states

*Possible contaminated land (plastic works formerly lies adjacent to part of the site).*

20. There is no evidence of contamination.

#### Green Belt

21. TP2 2b states as follows :

*The site contributes to the overall aims and purposes of the Oxford Green Belt and any development within the site would harm the integrity of the wider Oxford Green Belt.*

22. This comment is a general one which has been made against all the Green Belt sites in Appendix 2b. It is not specific to the Radley South site.

23. However, the Kirkham Response recommended that the site be released from the Green Belt, so disputing Appendix 2b on the nature and character of this specific site.

#### Benefits

24. Radley South, with a gross area of some 8.6ha gross, 7.9ha net could accommodate some 240 homes .
25. There would be other benefits to offer the community: a new site to the east of Radley South of a size suitable to relocate and build a new Village Hall, and make provision for pitches, cricket ground, allotments, children's play area etc. as shown on the Concept Plan (Appendix 2). The availability of the current Village Hall site for development could enable Radley College to fund the new building and provision of the facilities.
26. Additional funding, doubling that from Radley NW, could contribute to items including the Radley Lakes proposal in the Neighbourhood Plan and to education provision. There is also a possibility of land being made available to implement the proposed connection to Audlett Drive, also in the Neighbourhood Plan.

#### Delivery

27. The site is in single ownership and obviously deliverable in the short-term. If the allocated Radley North-West site were developed in tandem it would be possible to align S106 Agreements to include contributory funding/provision to benefit Radley, rather than a two-stage approach where such arrangements would be disjointed over time. Also, Radley NW may perceive it to be an unfair burden if it had to fund everything knowing that Radley South would later be developed. If the sites were to be developed in tandem, then proper provision could be made from the outset.

#### Conclusion

28. The Radley South Site should be identified in LP2. It has clear development potential; it was recognised for Green Belt release in the LP Pt 1 submission (supported by the Kirkham Report) and is relatively free from constraints. It is well connected by public transport (train and bus) thus reducing travel by car which is a principal theme of the Plan. It is well located to make a contribution to Oxford's unmet housing needs and can deliver housing quickly so contributing to the 5-year housing land supply. Concerns about transportation and access, the SAMs and site capacity have been addressed. The site can make a valuable and early contribution to District housing land supply and to the unmet housing needs of Oxford.

#### **6. modifications**

Amend Policies CP4a and CP8a to include Radley South as an additional or replacement allocation.

#### **7. participate**

yes

#### **8. reasons**

In order to assist the Inspector and the Examination on the merits of Radley South, which has been excluded as an allocated site.



## B3

3. To which part of the Local Plan does this representation relate?		
paragraph	policies	policy map
2.52 - 2.65	CP8b	
4. Do you consider the Local Plan is:		
legally compliant	sound	complies with DTC
yes	no	no

5. reasons
<p><b>DTC:</b> <b>Effective</b></p> <ol style="list-style-type: none"> <li>The housing numbers in the AOF Sub-Area rely heavily on the contribution of <b>Dalton Barracks</b>, which is not supported by the evidence, as follows.</li> <li>The site was identified for disposal in 'A Better Defence Estate' published by Government in November 2016. Unfortunately, the date for disposal is stated to be "2029"<sup>3</sup>. A 'reprovision plan'<sup>4</sup> to relocate 2 of the groups using the site has not yet been confirmed, although VWH considers that "<i>it is anticipated that the military units will be re-located no later than 2026</i>"<sup>5</sup>.</li> <li>Assurances, unsupported by evidence, that the site will be 'available' before 2029 are given in PVLP2 para 2.53. This is the identical wording, which is stated to be no more than "<i>an opportunity</i>", to that given in the Preferred Options version in March 2017, to which GPL and others raised concern. For such a large site which is critical to the housing delivery of the Local Plan it seems incredible that nothing further seems to have happened in seven months, and the PVLP2 has been published on the basis of apparently verbal exchanges that there is 'an opportunity' but without any robust evidence.</li> <li>PVLP2 Appendices (p13) mentions two documents, neither of which are available: <p style="text-align: center;"><i>To deliver an exemplar, sustainable, mixed use community that reflects 'Garden Village' principles and follows a comprehensive development framework approach in accordance with Core Policy 8b: <b>Dalton Barracks Comprehensive Development Framework and Supplementary Planning Document for Dalton Barracks</b></i></p> </li> <li>In October 2017 Vale of White Horse/South Oxfordshire DC's published the 'Housing Delivery Strategy'. Dalton Barracks is key, but difficult, site which is not mentioned in the Strategy, so clearly no assistance is envisaged on delivery. In response to the GPL submissions on this point an email from</li> </ol>

<sup>3</sup> 'A Better Defence Estate' p24

<sup>4</sup> a term used in the 'Defence' document which seems to mean 'relocate'

<sup>5</sup> PVLP2 para 2.54

Principal Development Officer stated that *“the aim of the draft Joint Housing Delivery Strategy is to work alongside Vale’s Local Plan 2031 Pt 2 with a focus on general delivery of newbuild homes and is not site specific.”* I pointed out that cannot be so because Didcot Garden Town and Berinsfield are mentioned several times.

6. In July 2017 VWHDC issued a press release stating that *“Building work on the long-awaited Grove Airfield development could get underway soon”*. It says that outline planning permission has finally been granted. It will require further approval of reserved matters (another year?) before ‘building work’ can start. My research has found that it is not only 70 years after the airfield closed, but more importantly 14 years after it first appeared in a planning policy document and 5 years after submission of the planning application.
7. In any event, there would be a start-up period after the MoD release which can be assumed to be at least 2 years - for a sale to be agreed, planning permissions obtained, contamination remediation and pre-development infrastructure provision. This means that any housing is most unlikely to be delivered until 2031 which is the very end of the plan period.
8. There is also concern about the lack of firm proposals for the provision of infrastructure (also mentioned in TP2 Appendix 2b), including highways and transportation to which PVLP2 (paras 2.59 - 2.61) refers:

*2.59 working in partnership with Oxford CC to plan for substantial highway and public transport improvements within this Sub-Area. Plans include provision for **upgrading the A34 interchange at Lodge Hill; a northbound bus lane between Lodge Hill and the Hinksey Hill interchanges on the A34;** and providing for **two new Park and Ride sites at Cumnor and Lodge Hill** (both close to Dalton Barracks) for accessing Oxford. Both of these Park and Ride sites will be **connected to key destinations in Oxford City via a Rapid Transit System.**”*

*2.60. An Abingdon – **Oxford Corridor Sustainable Transport Study** has informed the sustainable transport provision which should support the proposed development at Dalton Barracks. The improvements outlined in the study include the **provision of a bus and cycle link from Dalton Barracks to the new Park and Ride site at Lodge Hill**, which would provide a direct link from the proposed development to an interchange with services going in to the centre of Oxford and to other key destinations, such as the employment sites to the east of Oxford. The study also outlines the need for **enhancements to the frequency of bus routes** serving the site to reach ‘turn up and go’, or premium route, standard and **improved pedestrian and cycle links** from the site to Abingdon-on-Thames.*

*2.61. The Council will continue to work with Oxfordshire County Council to ensure opportunities for public transport, walking and cycling in this*



*area are maximised and are fully integrated with proposals for Dalton Barracks.*

9. This is a substantial wish list of infrastructure which is obviously critical to the delivery of Dalton Barracks, but apart from 'working closely' supported by 'studies' there is no mention of firm proposals or any kind of public funding. Any financial contribution from the Dalton Barracks development (1,200 dwellings) is very unlikely to fund much of this 'wish list'.
10. At the VWHDC Scrutiny Committee 20.9.17 the following points were raised and minuted:  
*In response to these comments, the Cabinet member and officers stated that:*  
  
*... Details of supporting infrastructure, including traffic management measures for Dalton Barracks and other sites would be considered as part of any planning application and S106 agreement; and*  
  
*The main public transport links for the Dalton Barracks development would be via the existing bus services.*
11. These comments seem to suggest that actual provision of infrastructure is almost seen as a 'detail' that can await a planning application rather than to be a matter to be resolved before such a major site could be included in the Local Plan.
12. The delivery of Dalton Barracks in VWH PVLP2 is therefore put no higher than an 'opportunity' with no other published timescale except disposal by the MoD in 2029. It is entirely unexplained in PVLP2, or anywhere else, how the site is expected to make any meaningful contribution to housing supply within the plan period, much less how 1,200 homes could be completed. Clearly no contribution is remotely possible within a 5-year housing land supply period and extremely doubtful for any part of the plan period.
13. The provision of essential highways and transportation infrastructure has only reached the stage of a 'wish list' and mention of 'working with Oxfordshire CC' informed by 'studies'. There is no mention of the detail necessary or the provision of funding required to actually have confidence that this essential infrastructure will be available as an integral precursor to the development of the site.
14. Without this confidence in infrastructure provision, and in the absence of a clear and justified timetable for delivery of the site, Dalton Barracks cannot be included in PVLP2.

**Consistent with National Policy**

The identification of the 'key site' of Dalton Barracks is flawed contrary to NPPF para 47 pt 1.

**6. modifications**

CP4a, 8a and 8b should provide the robust and written evidence that Dalton Barracks will deliver 1,200 homes needs to be robust (see also CP4a, 8a response).

**7. participate**

Yes.

**8. reasons**

To assist the Inspector

- on this analysis of the lack of evidence to support the inclusion of the Dalton Barracks site and consequent shortfall in the housing numbers in the Pt 2 Plan



**VWH Publication Version Local Plan Part 2**

**Response on behalf of Arnold White Estates Ltd by Gardner Planning Ltd**

**Appendix 2**

**Radley South Concept Plan**



- Radley South proposed development
- Other available land in the same ownership
- Current Village Hall and playing fields

- Proposed boundary planting
- Proposed street trees
- Proposed allotments
- Proposed playing fields
- Proposed open space
- Proposed residential
- Proposed footpath/cycleway
- Sustrans Route 5
- ▲ Vehicular access
- △ Pedestrian access

## Land South of Radley