

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

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

Mark

Owen

Planning Consultant

Barton Willmore LLP

The Blade

Abbey Square

Reading

Berkshire

RG1 3BE

0118 943 0000

mark.owen@bartonwillmore.co.uk

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Please see the attached representation letter.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the attached representation letter.

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The University is in broad support of the Plan and is keen to work with the Council to ensure that it is found sound under the tests of soundness contained within the National Planning Policy Framework (NPPF). However, as discussed within our attached representation letter, the University is concerned that the role of smaller scale proposals on suitable and deliverable sites have been discounted for inclusion within the LPP2 – Publication Version document which could assist the VoWH in meeting its proportion of Oxford City's unmet housing need.

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:

22 November 2017

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

☒

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

☐

Please do not contact me again

☐

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

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

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

Planning Policy,
Vale of White Horse District Council,
135 Eastern Avenue,
Milton Park,
Milton,
ABINGDON. OX14 4SB

17838/A3/MO/dw

BY EMAIL & POST: planning@whitehorsedc.gov.uk

22nd November, 2017

Dear Sir/Madam,

VALE OF WHITE HORSE LOCAL PLAN 2031
PART 2 - PUBLICATION VERSION OF THE LOCAL PLAN 2031 PART 2 DETAILED POLICIES
AND ADDITIONAL SITES
REPRESENTATIONS ON BEHALF OF THE UNIVERSITY OF OXFORD

We write on behalf of our client, the University of Oxford ('the University'), in response to the above consultation which seeks the views of interested parties on the Council's Publication Version of the Local Plan 2031 Part 2: Detailed Policies and Additional Sites document (October 2017) (to be abbreviated as 'LPP2 - Publication Version' within these written representations). The University has land interests within the Vale of White Horse (VoWH) district and has engaged with the Council historically in relation to site promotion activity through previous Local Plan processes (including the adopted Local Plan Part 1 - Strategic Sites and Policies), most recently in respect of the site known as Land North of Hazel Road, Botley.

The University of Oxford has several land holdings within the district but for clarity is promoting the following three sites for development:

- Land north of Hazel Road, Botley (HELAA Ref: BOTL01) (See **Appendix 1**)
- Allotment site to the west of Tilbury Lane, Botley (Ref: BOTL09) (See **Appendix 2**)
- Land at Oxford University, Said Business School (Ref: KENN01) (otherwise known as 'Land at Egrove, University of Oxford') (See **Appendix 3**)

It is important to note from the outset that the University is in broad support of the Plan and is keen to work with the Council to ensure that it is found sound under the tests of soundness contained within the National Planning Policy Framework (NPPF). The University are encouraged that VoWH have proactively collaborated within local authorities within Oxfordshire to consider the unmet housing needs for Oxford City, and note that the both the Local Plan Part 1 and Local Plan Part 2 look to meet the districts apportionment of the City's unmet need (2,200 dwellings). However, as discussed below, the University is concerned that the role of smaller scale proposals on suitable and deliverable sites have been discounted for inclusion within the LPP2 - Publication Version document which could assist the VoWH in meeting its proportion of Oxford City's unmet housing need.



FS 29637

Registered in England
Number: 06342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

The University are aware that house prices in Oxford are some of the highest in the country, making it very difficult for early career academics, and members of University staff, to find appropriate accommodation. In response to this the University has expressed an ambition to build "subsidised housing" for them. This would be good for both the academic mission of the University, and in terms of releasing pressure on the Oxford housing market.

The University has therefore proposed that planning policy in the City and surrounding areas should be adjusted to allow the University to construct intermediate housing (affordable private rented housing) for staff without incurring additional affordable housing requirements for social rent. The University has similarly been promoting the need to construct further graduate housing, again in order to release pressure on the Oxford housing market.

A key factor affecting the University's graduates, in particular post-graduate researchers (PGRs) who are in the City for up to four years, is that if they are unable to find accommodation through their Colleges or the University, they will then rent through the private market, thereby increasing the pressure on housing available across the City. The University intends to develop its land and buildings in ways that most suit its priority needs but also where they are of benefit to the City and the Vale, in terms of design, uses and impacts. The University therefore has as aspirations to build at least 1,000 undergraduate rooms, 2,000 graduate rooms and 2,000 units of intermediate affordable housing on its land for its own use and with the help of the Colleges.

The University is therefore seeking a planning policy framework that allocates key uses to specified locations but with a measure of flexibility to enable it to meet known priorities at the time it is proposing particular developments.

Spatial Strategy

Core Policy 4a (Meeting our Housing Needs) of the LPP2 - Publication Version acknowledges that 3,420 dwellings will be allocated through the Local Plan Part 2 which is split between the Abingdon-on-Thames and Oxford Fringe Sub-Area (2,020 dwellings) and the South-East Vale Sub-Area (1,400 dwellings). The LPP2 - Publication Version also acknowledges that the agreed quantum of unmet need for Oxford to be addressed within the Vale is allocated to the Abingdon-on-Thames and Oxford Fringe Sub-Area.

As indicated above, our client is in support of the Council's proactive approach in looking to meet its proportion of Oxford City's unmet housing needs. Our client is also in agreement with the approach of focussing the majority of allocated sites within the Abingdon-on-Thames & Oxford Fringe Sub-Area due to its proximity to Oxford City.

However, we consider the locations of the proposed allocated sites within the Abingdon-on-Thames & Oxford Fringe Sub-Area are inconsistent with the spatial strategy set out within the Council's Local Plan Part 1 document with a focus on Larger Villages.

In consideration of the role of the Abingdon-on Thames and Oxford Fringe Sub-Area, the Local Plan Part 1 Inspector stated the following (we note this is also quoted within the Council's 'Topic Paper 2 - Site Section' document at paragraph 4.9):

".....the Abingdon-on Thames and Oxford Fringe Sub-Area contains the Vale's largest settlement (Abingdon) in addition to the local service centres of Botley and a number of larger villages, including Radley and Kennington. A substantial part of the OAN arises from demographic changes which points to a need for new housing in this part of the district as well as in the area greatest employment growth. Moreover, this part of the district is closest to Oxford City....." (Paragraphs 55 and 56)

As indicated by 'Core Policy 3: Settlement Hierarchy' within the Council's Local Plan Part 1 - Strategic Sites and Policies document, the settlement of Botley is identified as a Large Service Centre with a level of facilities and services and local employment to provide the next best opportunities for sustainable development outside the district's Market Towns.

Page 20 of the LPP2 - Publication Version document, states that one of the main strands of the districts spatial strategy is to *"reinforce the service centre roles of the mains settlements across the district"*. However, the settlement of Botley, identified as a Large Service Centre and therefore above Larger Villages within the settlement hierarchy, has not received allocations for development in the Part 1 Local Plan, and is neither proposed to accommodate further growth in the LPP2 - Publication Version.

This is surprising on two accounts. Firstly, Botley is a sustainable location as clearly indicated by the fact that the settlement is identified as a Large Service Centre within the Local Plan Part 1 document. The Town and Village Facilities Study (Updated February 2014) which informed the Local Plan Part 1, clearly indicates the sustainable credentials of Botley as compared to the other settlement within the Sub-Area. This study includes a scoring system based upon the extent of facilities and services within each settlement i.e. the higher the score the more sustainable the settlement. Botley is given a total score of 34 points which is significantly higher than the Larger Villages of Kingston Bagpuize with Southmoor (score of 17), Marcham (score of 15) and East Hanney (score of 14). The table below provides further clarity as to the services and facilities located within Botley as compared to these settlements:

Settlement	Services and Facilities
Botley	<ul style="list-style-type: none"> - Primary School (Botley CofE Primary School) - Secondary School (Matthew Arnold School) - Botley Medical Centre - Variety of retail outlets - Village Halls - Botley Library - Open recreation area (Louie Memorial Playing Fields, Fogwell Road Open Space, Pinnocks Way Playground and Recreation area) - Churches - Public Houses - Botley Post Office
Kingston Bagpuize with Southmoor	<ul style="list-style-type: none"> - Primary School (John Blandy VC Primary School) - Local shops - Church - Public Houses - Kingston Bagpuize with Southmoor Post Office - Mobile Library - Open recreation area
Marcham	<ul style="list-style-type: none"> - Primary School (Marcham CofE Primary School) - Marcham Post Office - Mobile Library - Public House - Church - Open recreation area (Marcham Sports and Social Club)
East Hanney	<ul style="list-style-type: none"> - Primary School (St Nicholas CofE Primary School) - Village Hall - Mobile Library - Church - Public Houses - Open Recreation areas (playground & Challow Childrey Cricket Club)

In addition, 'Core Policy 11: Botley Central Area' of the Local Plan Part 1 document sets out requirements for, a comprehensive retail-led redevelopment and upgrading of Botley Central Area. We are aware that a planning application was granted permission in September 2016 for the redevelopment of this existing centre (otherwise known as the 'West Way area regeneration') which further support the sustainable credentials of this settlement.

The second reason as to why it is surprising that Botley has not received allocations, is its proximity to Oxford City. The centre of Botley is approximately 2 miles from the centre of Oxford City, accessible via the Botley Road with regular buses (approximately nine an hour) to Oxford City centre, with a journey time of approximately 10 minutes.

It is noted that the Sustainability Appraisal Report (September 2017) supporting the LPP2 - Publication version document states at pages 45 and 46 that from an accessibility point both East Hanney and Kingston Bagpuize with Southmoor are "*relatively remote*" from Oxford even though both settlements are found along strategic transport corridors. It is therefore surprising that VoWH have decided to propose the allocation of 600 dwellings at Kingston Bagpuize with Southmoor and 140 dwellings at East Hanney when unconstrained, suitable and deliverable sites located within close proximity of Oxford City are available.

Two examples of such suitable sites are 'Land north of Hazel Road, Botley' (HELAA Ref: BOTL01) and the 'Allotment site to the west of Tilbury Lane, Botley' (Ref: BOTL09).

'Land north of Hazel Road, Botley' (HELAA Ref: BOTL01) (See Location Plan at **Appendix 1**) is former safeguarded land which was removed on adoption of the Local Plan 2011 but not allocated for development as 150 dwellings at Tilbury Lane (site located to the west of 'Land north of Hazel Road, Botley') was considered sufficient at the time. As a result, this site constitutes as 'white land' on the Council's proposals map meaning that it is without any specific designation or allocation in the Local Plan and accordingly free from any restrictive planning policies. As this land was left available to accommodate future growth, we consider that this is an appropriate opportunity to accommodate such growth as an allocation through the Local Plan Part 2. This site is considered to have a capacity of approximately 60 dwellings.

The client's intention for the 'Allotment site to the west of Tilbury Lane, Botley' (Ref: BOTL09) (See Location Plan at **Appendix 2**) is for the existing allotments to be re-located within Green Belt land to the north east and north west of Tilbury Lane, Botley (Referred to as BOTL10 and BOTL11 within the HELAA, and as labelled as 'A1' and 'A2' within **Appendix 1** and **Appendix 2**) which are also in the ownership of the University of Oxford. It should be noted that allotments are a compatible land use within the Green Belt. Therefore, there is an opportunity to make available a suitable development site within the settlement area of Botley and re-locating the existing allotments to an appropriate location to the immediate north of the Tilbury Lane development. This site is considered to have a capacity of approximately 50 dwellings.

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

However, through the Council's site selection process, both sites have been discounted for consideration as allocations within the Local Plan Part 2. Within the evidence base which supported the LPP2 - Preferred Options document, the Council's assessment concluded that these sites had insufficient capacity for residential development. However, within our representations to the LPP2 - Preferred Options document we contested the site selection methodology as the Council had used an average 25 dwellings per hectare figure to work out the capacity of sites.

It is noted within Table 3.1 of the 'Topic Paper 2 - Site Selection' document that the Council have amended their site selection methodology, which has meant that the density of a site, and therefore its capacity, is more reflective of its location. However, within Appendix 1 of the 'Topic Paper 2 - Site Selection' both 'Land north of Hazel Road, Botley' and the 'Allotment site to the west of Tilbury Lane, Botley' have been discounted at Stage 3 - Detailed Assessment of Constraints and Opportunities of the Council's site selection process.

In respect to 'Land north of Hazel Road, Botley', Appendix 1 of the 'Topic Paper 2 – Site Selection' states:

"Site is within the built-up area of Botley as defined by the Oxford Green Belt. Development could come forward if it accords within the policies of Local Plan 2031, however there are known access issues with this site due to the constrained nature of adjacent streets."

The University would like to emphasise that this is an inadequate explanation for why this site has been discounted for further consideration. The text quite clearly states that development could come forward if it accords within the policies of Local Plan 2031, yet it seems has been discounted due to 'known access issues'. However, there is no reference to any Assessments i.e. a Transport Study, justifying this comment. In addition, it is noted that within the HELAA Assessment of this site it states under the heading 'Access' that *"there is potential for safe access to be provided"* which clearly contradicts the above comment. Furthermore, it should be noted that the access arrangements for the recently built Tilbury Fields development do present opportunities for access to this land as well as from Hazel Road. The University therefore considers that this site has been unfairly discounted from the Council's site selection process without sufficient evidence.

In terms of the 'Allotment site to the west of Tilbury Lane, Botley', Appendix A of the 'Topic Paper 2 - Site Selection' states:

"Site is currently in active use as an allotment, the loss of such open space is not supported in principle by the Council, except where it can be demonstrated that the site meets the requirements of Development Policy 33."

However as clearly indicated above, which has been expressly indicated in previous representations, our client has a solution to ensure that the allotments will be re-located within land owned by the University: which we accept would be a pre-requisite of identifying the allotment site for new homes: however given the University controls both land parcels this creates an opportunity for accommodating further sustainable development. This would therefore be in accordance with emerging Development Policy 33 (Open Space) which states that development of open space will only be permitted provided that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of scale, quantity and quality in a suitable and accessible location.

The University therefore considers that this site has also been unreasonably discounted from the Council's site selection process.

Based on the above, the University considers that the Plan is not sound as it has not been positively prepared as it fails to support the spatial strategy set out within the Local Plan Part 1 by overlooking the opportunities of allocating sites at the sustainable settlement of Botley. Furthermore, the University considers that the site selection methodology is not justified as the Council have not presented proportionate evidence, as exemplified above, for discounting sites which are suitable deliverable sites and within close proximity of Oxford City.

On this basis, The University considers that the Council should reassess sites which, as exemplified above, are suitable deliverable sites which, due to their proximity to Oxford, could assist in meeting the Vale's proportion of the City's unmet housing need.

Windfall Allowance

As indicated within the table at **Core Policy 4a**, it is expected that in total 1,100 dwellings will come forward via windfalls within the Plan period. We note that this windfall allowance has been split between the sub-area within the district as follows:

- 308 dwellings within the Abingdon-on-Thames & Oxford Fringe Sub-Area
- 484 dwellings within the South East Vale Sub-Area
- 308 dwellings within the Western Vale Sub-Area

The University note that within the LPP2 - Preferred Options document, published earlier this year, that the windfall allowance was 820 dwellings over the Plan period. Therefore, the windfalls allowance has risen by 260 dwellings over the Plan period since the last consulted version of the Plan. The LPP2 - Publication Version confirms that the windfall figure of 1,100 dwellings has been updated to reflect past delivery.

On page 32 of the 'Topic Paper 2 - Site Selection' document it states that the Council has reviewed the completions on small housing sites that have taken place between 2011/12 and 2016/17, and concludes that this demonstrates that small housing sites are a reliable source of supply in the district and therefore the Council have increased its windfall allowance from 70 dwellings a year to 100 dwellings a year.

The University would like to take this opportunity to emphasise that the NPPF states at paragraph 48:

"Local planning authorities may make allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. An allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens." (our emphasis)

Although the Council has considered historic windfall delivery rates, the University considers that the Council has failed to provide 'compelling evidence' for its windfalls allowance of 1,100 dwellings. Firstly, it is noted that the housing completions per year over the period 2011/12 - 2017/17 is 169 dwellings yet Table 4.3 clearly indicates that this figure is skewed by a high completions rate of 448 dwellings within 2016/17. There is no justification within this Topic Paper as to how these figures have been derived nor an explanation as to why the completion figure in 2016/17 is so high. Secondly, although the Council have provided historic windfall delivery rates to justify its windfalls allowance, there is no reference to the Council's Housing Land Availability Assessment nor expected future trends therefore the University do not consider that the Council have appropriately justified its windfall allowance in accordance with paragraph 48 of the NPPF.

In addition to the above points, we find it rather surprising that the Council has put so much reliance on windfalls contributing to approximately 24% of the housing requirement within the LPP2 Publication Version when added to the Part 2 allocations figure of 3,420 dwellings. We also find it surprising that although the LPP2 - Publication Version document allocates more sites within the Abingdon-on-Thames and Oxford Fringe Sub-Area rather than the South-East Vale Sub-Area, the windfall allowance is greater within the South-East Vale Sub-Area than the Abingdon-on-Thames and Oxford Fringe Sub-Area. In addition, 308 dwellings are expected to come forward as windfalls within the Western Vale Sub-Area which is the same windfall allowance figure for the Abingdon-on-Thames & Oxford Fringe Sub-Area, yet no allocations are proposed within the Western Vale Sub-Area within the LPP2 Publication Version. We therefore consider that the windfall allowance has disproportionately been split between the sub-areas and does not reflect the location of allocations to come forward within the sub-areas.

In addition to the above point, we note that the text directly above the table at **Core Policy 4a** states:

“Additional dwellings (for example, windfalls) will be delivered through Neighbourhood Development Plans or through the Development Management Process.”

We have undertaken a review of the Neighbourhood Plans that have either been adopted or currently emerging. We note that at the current point of time there are five adopted Neighbourhood Plans. Out of these five adopted Neighbourhood Plans, it is our understanding that only the Drayton Neighbourhood Plan is allocating sites for housing. The settlement of Drayton lies within the Abingdon-on-Thames & Oxford Fringe Sub-Area.

Although we note that several Neighbourhood Plans are still at a very early stage in preparation, we consider that there is an absence of evidence to suggest that the above-mentioned Neighbourhood Plans, and any other plans in the pipeline, have an obligation to deliver housing sites to ensure that the windfall allowance can be met which forms a component of the housing requirement for the district. The proportion of windfall development is therefore both inconsistent in its distribution with the spatial strategy and focus for development in the Abingdon-on-Thames & Oxford Fringe Sub-Area and moreover does not provide sufficient certainty of delivering a significant proportion of the Council's requirement for new homes. Therefore, The University considers the Plan is not flexible and has not demonstrated deliverability of this component of the housing land supply. On this basis, the LPP2 - Publication Version cannot be considered sound as it does not have a justified strategy for delivering houses.

If the Council is not willing to specify the locations for housing sites to be delivered through Neighbourhood Plans across the district, then we consider that the district should have a fall-back position to include further or 'reserve' small scale allocations to ensure that they are able to meet the required growth within the Plan period. The alternative option is to include a policy which clearly allocates housing via Neighbourhood Plans at settlements within the district. As an example, we would recommend a policy similar to 'Policy SS5 - Neighbourhood Planning' (see **Appendix 4**) within the recently adopted Basingstoke and Deane Local Plan which also confirms that if a Neighbourhood Plan does not allocate housing by a point in time then the strategic plan (Local Plan) will be reviewed to allocate housing.

Dalton Barracks

As indicated at **Core Policy 4a** and **Core Policy 8a** (Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area), the largest allocation within the Abingdon-on-Thames & Oxford Fringe Sub-Area, is the Dalton Barracks site which is to provide 1,200 dwellings within the Plan period. The University note that paragraph 2.53 of the LPP2 Publication Version document states that *"dialogue between the Defence Infrastructure Organisation (DIO) and the District Council has identified an opportunity to release the site sooner than 2029 and the Council is satisfied that 1,200 homes can be delivered on the site within the plan period up to 2031"*.

We note that the Evidence Base includes a 'Housing Trajectory' (October 2017) which indicates (in Table 2) that housing completions at the Dalton Barracks site will start coming forward from 2023/24. There is a note below the table which states that 'the site trajectories are based on discussions with the respective site promoters and/or developers'. However, there is no evidence provided within the LPP2 - Publication Version which details the dialogue between the DIO and the District Council to justify that 1,200 homes can be delivered before 2029, nor is there any clarification as to why completions on site should start in 2023/24. The only published document, which is referred to at footnote 29 on page 33 of the LPP2 Publication Version, is a report prepared by the Ministry of Defence (MOD) titled 'A Better Defence Estate' (November 2016) which simply confirms that the estimated date of disposal for the Dalton Barracks site is 2029.

In addition, a Housing Study prepared by Wessex Economics, dated May 2017, which forms as evidence base to the Draft Vale of White Horse and South Oxfordshire District Joint Housing Delivery Strategy document, which was published for public consultation in October 2017, refers (at paragraph 4.84) to the above MOD document noting an indicative release date of 2029 but makes no reference to the fact that housing will be delivered on this site earlier than this date.

Bearing in mind that the Plan period is up to 2031, if the site is not released until 2029 then realistically the site is going to deliver very little dwellings within the Plan period. We therefore consider that the Council cannot rely on a substantial part of its housing requirement within the Abingdon-on-Thames & Oxford Fringe Sub-Area on a site which will likely deliver the majority of dwellings post 2031. We therefore, consider that the Local Plan Part 2 should focus on allocating additional smaller sites which can generally be brought forward at a quicker rate, with on-site completions soon after commencement to ensure that the district is able to meet its housing requirement if Dalton Barracks is only able to deliver late in the Plan period. This is further emphasised by paragraph 3.11 of the 'Topic Paper 2 - Site Selection' document which states that the Council recognises that *"smaller sites can contribute significantly to supporting housing delivery as they can deliver quickly and thus help to maintain a five-year supply of housing land"*. Examples of this is include the sites being promoted by our client which are non-strategic sites that could come forward at an early stage in the plan ensuring ongoing delivery within the plan period.

On the basis that there is no clear evidence to suggest that Dalton Barracks will be delivered prior to 2029, we consider realistically that this site will deliver, at maximum, approximately 200 dwellings within the Plan period. On this basis, the Council will need to find approximately 1,000 dwellings to ensure it is able to meet the housing requirement as set out within the LPP2 - Publication Version. We consider that the University's sites at Botley and at Kennington could assist the Council in meeting this deficit, all of which are sustainable sites, with proximity of Oxford City. In addition, these sites are small in scale therefore can be delivered swiftly which will assist the Council's five-year land supply. We therefore consider that **Core Policy 8a** (Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area) should be amended to indicate that Dalton Barracks will deliver 200 dwellings and that the following sites, in addition to others, should be allocated:

- Land north of Hazel Road, Botley (approximately 60 dwellings)
- Allotment site to the west of Tilbury Lane, Botley (approximately 50 dwellings)
- Land at Egrove, University of Oxford (approximately 50 - 160 dwellings)

Green Belt Release

We note that **Core Policy 13a** (Oxford Green Belt) proposes to remove part of the Dalton Barracks site from the Green Belt to allow for it to be developed for houses. As indicated at paragraph 2.75, the VoWH consider that given its size, proximity to Oxford and the extent of previously developed land within the site area, demonstrate 'exceptional circumstances'.

On the subject of further releases of parcels of land from the Oxford Green Belt, paragraph 2.67 of the LPP2 - Publication Version document refers to the following text within the Planning Inspector's Report to the Local Plan Part 1:

"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"

Given that the Local Plan Part 1 Inspector considered that the Local Plan Part 2 provides an opportunity to remove further land from the Green Belt, we consider that the Council should be more proactive in considering the release of further land from the Green Belt in addition to the Dalton Barracks site (especially in the context of the need to identify deliverable sites rather than rely on windfalls or the Dalton Barracks site), in particular suitable and deliverable sites which are within proximity of Oxford City to assist the Council in meeting its proportion of Oxford City's unmet needs.

'Land at Oxford University, Said Business School' (Ref: KENN01), otherwise known as 'Land at Egrove, University of Oxford', is located to the north of the Larger Village of Kennington found within the Green Belt (See Location Plan at **Appendix 3**). The site is accessible from the A34 (which runs to the west of the site) and located within close proximity to both Kennington and Oxford City (approximately 2 miles from the City centre). Within the Oxford Green Belt Study (October 2017), in reference to this Site (labelled as 'Site 1') the Study concludes (page 42):

"The site has some contribution to the overall aims and purposes of the Green Belt. The southern part of the site has potential for development without significant harm to the wider Green Belt designation."

The University supports the conclusions of this Green Belt Study which clearly indicate that the site has potential for development. On this basis, we consider the site should be removed from the Green Belt as it does not meet the purposes of the Green Belt (as indicated by paragraph 80 of the NPPF) on the following grounds:

- The A34 (along the western boundary of the site) and the A423 Southern By-Pass Road (along the northern boundary of the site) ensure that development at this site would not result in urban sprawl.
- Due to the A423 Southern By-Pass Road along the northern boundary of the site ensures that development would not result in Kennington merging with the urban fringe of Oxford City.
- Due to the urban features surrounding the site, including the A34 and existing residential dwellings, plus the Said Business School itself, ensure that the site has an urban character. On this basis, the site does not play a role in safeguarding the countryside from encroachment.
- This site does not have a role in preserving the setting and special character of historic towns.
- There is clear need for housing within the district beyond recycling derelict and other urban land, and this sustainable site would assist the district in meeting this need.

In addition, due to on site constraints, it would be expected that only land located closest to Kennington would be appropriate for development therefore ensuring a large part of the site would remain undeveloped.

The University therefore considers there are clear exceptional circumstances to remove this sustainable site from the Green Belt so that it can assist in meeting the Council's proportion of Oxford's unmet housing needs. We therefore consider **Core Policy 13a** should be amended to include the removal of 'Land at Egrove, University of Oxford' from the Oxford Green Belt.

Development Management Policies

This section of the representations provides comments in regard to specific Development Management Policies included within the LPP2 - Publication Version document and, where necessary, an explanation for why such policies should be amended.

- Development Policy 2: Space Standards

We note that this policy refers to DCLG's Technical Housing Standards (March 2015) which the Planning Practice Guidance (PPG) (Para. 002 Ref ID:56-001-20150327) describes as 'optional' technical housing standards. We also note that the Government's recently published Housing White Paper indicates, as part of its proposals of 'Planning for the right homes in the right places' (see page 18), that space standards will be reviewed to make better use of land for housing by encouraging higher densities. We therefore consider that such Technical Housing Standards should be considered as a guide to allow for flexibility on the basis that they are not statutory standards and will be subject to review.

- **Development Policy 8: Community Services and Facilities**

We support the principle of this policy for the provision of new or extended community facilities and services which can assist in promoting social inclusion.

- **Development Policy 20: Public Art**

Although we note that this policy reflects the wording of saved policy DC4 of the Local Plan 2011 however we feel that the policy should be amended to be more closely aligned with the wording of 'Principle DG42: Public Art' of the Council's adopted Design Guide SPD which states that public art should be considered at an early stage of the design process but does not set a requirement that the provision of public art is a requirement for proposals for major development or sites larger than 0.5 hectares. This more flexible approach is more appropriate as a large majority of major schemes will initially be submitted as outline proposals whereby matters such as the location of public art would only be considered at a detailed planning stage.

- **Development Policy 29: Settlement Character and Gaps**

Although we understand the need to protect the countryside, we consider that this policy is too generic and therefore restrictive especially as the opportunities of bringing forth sustainable greenfield sites within the district are already limited by designations such as Green Belt and AONB. It should be noted that the NPPF states at paragraph 113 that:

"Local planning authorities should set criteria based policies against which proposals for any development on or affecting..... landscape areas will be judged."

We therefore consider that if this policy is to comply with the NPPF then the Council must provide a clear justification as to why specific gaps are appropriate within the district based upon appropriate landscape character assessments.

- **Development Policy 33: Open Space**

We agree that, where possible, developments should provide or contribute towards safe, attractive and convenient open space however we consider that this policy should be amended to provide flexibility by stating that such provision can be provided in lieu depending on the nature of the site.

- **Development Policy 36: Heritage Assets**

Firstly, we would contest the necessity of this policy considering the Plan also includes specific policies relating to Conservation Areas (**Development Policy 37**) and Listed Buildings (**Development Policy 38**). We agree, in accordance with the NPPF, that proposals for new development that may affect heritage assets will be supported where they conserve the significance of the heritage asset. However, paragraph 131 of the NPPF states clearly that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets. On this basis, the NPPF is quite clear in stating that enhancing the significance of a heritage asset is not a requirement (see also the statutory duty for Conservation Areas in s72 of the 1990 Act). We therefore consider that this policy should be amended to make it clear, in accordance with the NPPF, that proposals for new development should conserve **or** enhance the significance of heritage assets.

Conclusions

The University supports the proactive approach that has been taken by the Council in seeking to accommodate the proportion of Oxford City's unmet needs yet that said, the University is of the view that the assessment of identifying allocations within the LPP2 - Publication Version document is flawed as it has failed to recognise the role of suitable deliverable sites within locations close to Oxford City.

The University of Oxford's Botley sites ('Land north of Hazel Road, Botley' and the 'Allotment site to the west of Tilbury Lane, Botley') lie within a highly sustainable settlement located close to the centre of Botley and within easy reach of Oxford City Centre by public transport. Moreover, both sites are unconstrained with 'Land north of Hazel Road, Botley' constituting as white land on the proposals map, meaning that is without any specific designation or allocation in the Local Plan and accordingly free from any restrictive planning policies, and the 'Allotment site to the west of Tilbury Lane, Botley' is located within the settlement of Botley with the option to move the existing allotments to nearby Green Belt land (a compatible land use within the Green Belt) also in the ownership of our clients.

With regard to the 'Land at Oxford University, Said Business School', the site is located within a sustainable location on the edge of the settlement of Kennington within close proximity of Oxford City. We have set out within these representations clear reasons as to why the site does not meet the purposes of the Green Belt and therefore believe that there are exceptional circumstances for this site to be released from the Green Belt to assist the Council in meeting its proportion of Oxford City's unmet housing needs.

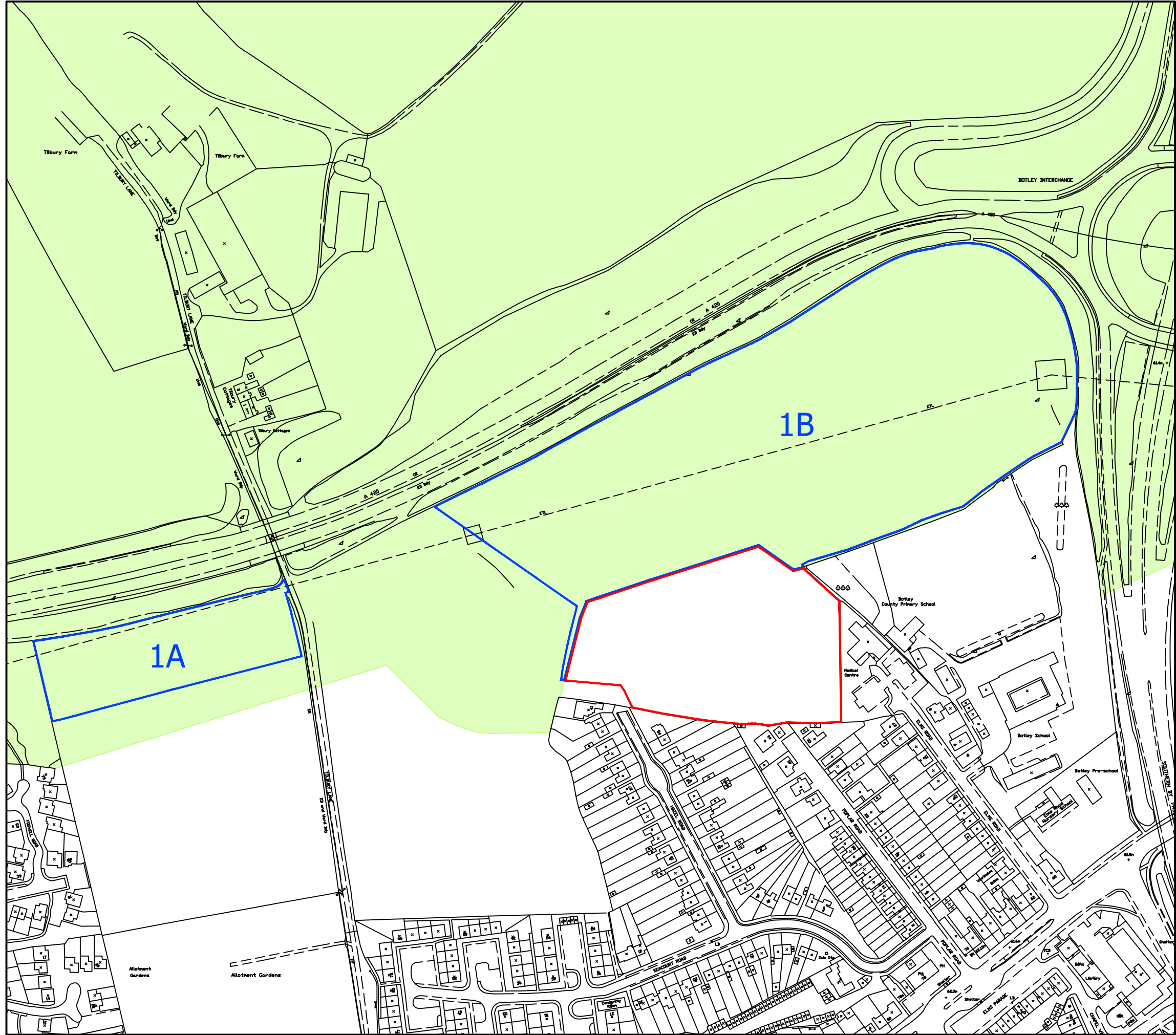
We trust that the above representations are helpful to you and await confirmation of their receipt. In the meantime, should the Council have any queries or require any further clarification on the above matters, please do not hesitate to contact me.

Yours faithfully,

MARK OWEN
Senior Planner

Encs.

cc. Ms. R. Horley - University of Oxford






The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
B	24.09.14	ALC	NPN
C	04.05.17	M.D.	M.O.

Added "Area 1" in legend.
Labels 1A & 1B added.

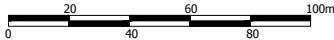
LEGEND

-  Site Boundary
-  Green Belt
-  Additional University Land in Green Belt Area 1

Project
**Land North of Hazel Road,
Botley**

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
23.09.2014	1:2,500 @A3	ML	NP-N
Project No	Drawing No	Revision	
17838	P001	C	



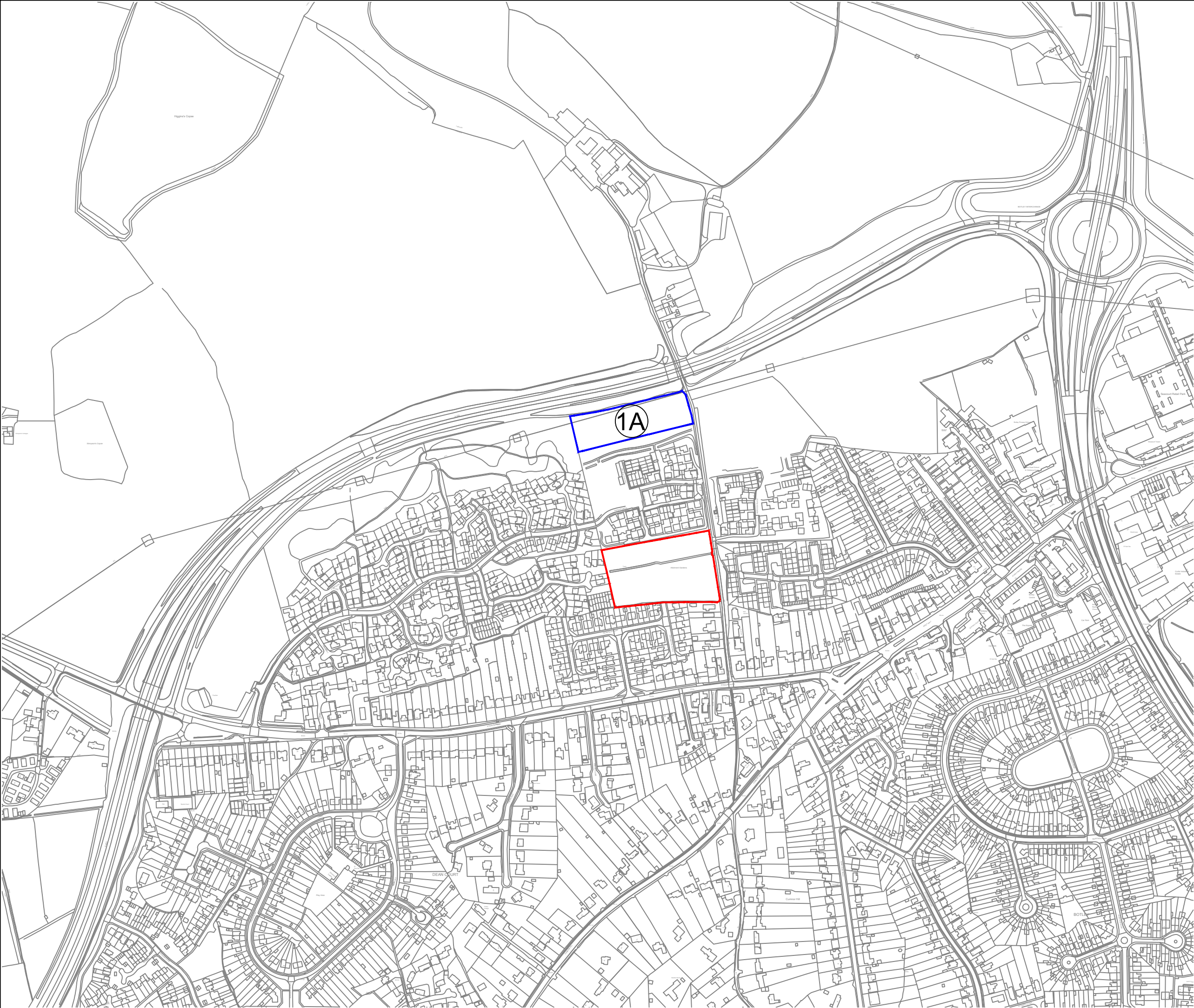
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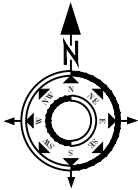


Offices at Bristol Cambridge Cardiff Ebbsfleet Edinburgh Leeds
London Manchester Newcastle Reading Solihull Southampton



GENERAL NOTES

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Site Boundary

Additional University
land in Green Belt



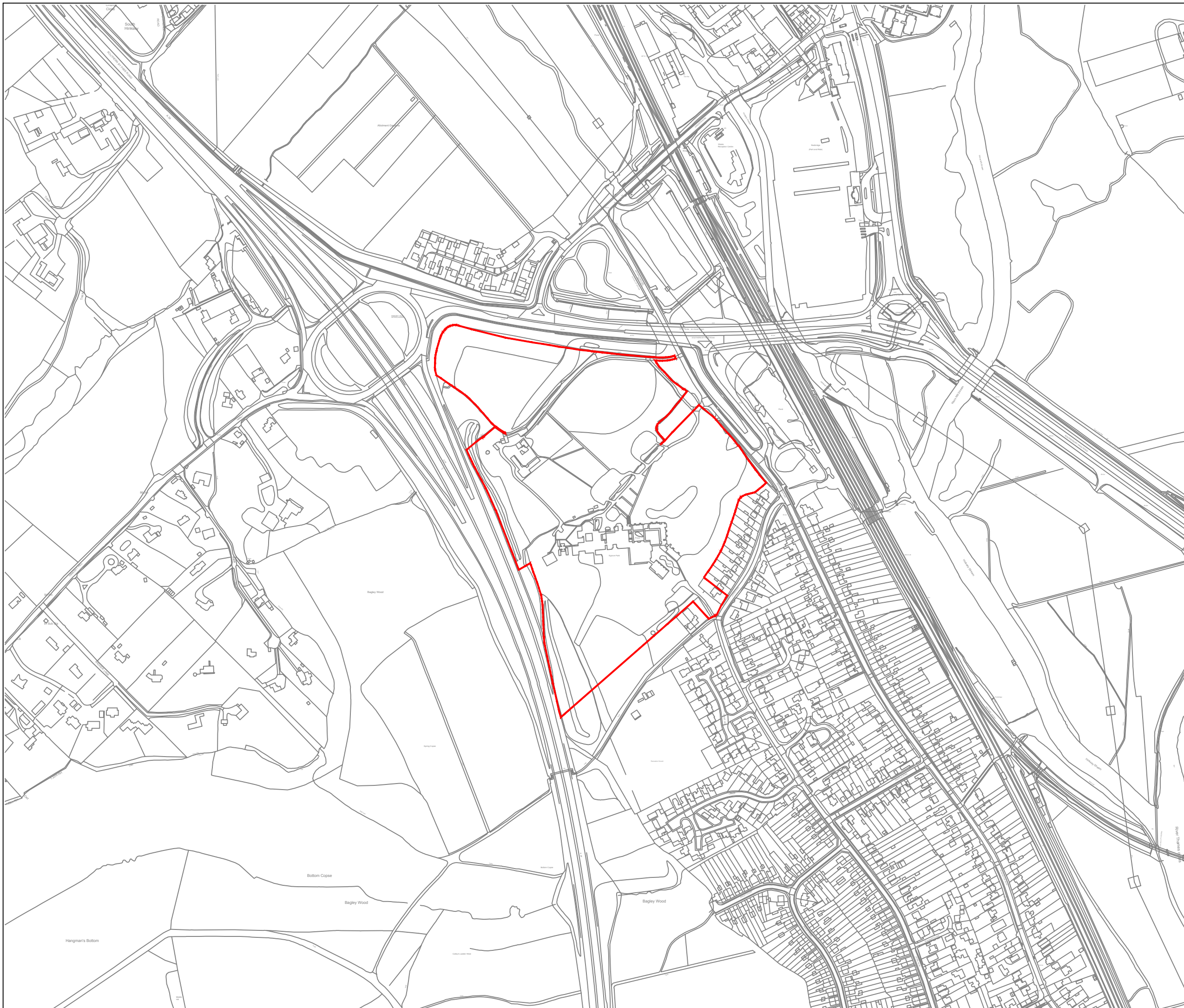
UNIVERSITY OF
OXFORD

ESTATES SERVICES

SITE	Allotment Site - West of Tilbury Lane - Botley		
BUILDING	All Buildings		
FLOOR	-		
DRAWING NUMBER	LP/17/05/03		
DRAWN BY	L.P.H.	PAPER SIZE	
CHECKED BY	D.M.S.	SCALE	1:5000
APPROVED BY	-	REV	-
DATE	03 May 2017		

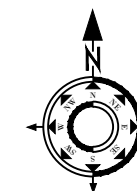
CHECK ALL DIMENSIONS. DO NOT SCALE

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GENERAL NOTES

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Area = 13.75ha



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ESTATES SERVICES

SITE	Egrove Park Site (036)		
BUILDING	All Buildings		
FLOOR	-		
DRAWING NUMBER	036/LP/2016/07/06		
DRAWN BY	L.P.H.	PAPER SIZE	A3
CHECKED BY	D.M.S.	SCALE	1:5000
APPROVED BY	-	REV	-
DATE	05 July 2016		
CHECK ALL DIMENSIONS. DO NOT SCALE			
© OXFORD UNIVERSITY ESTATES SERVICES			



- 4.62 Given local water quality issues, further development will also be dependent on the status of water bodies, and this will be considered through monitoring undertaken by the Environment Agency through the relevant River Basin Management Plan and annual monitoring information which will be reported through the council's annual monitoring. In the event that this indicates that the status of the borough's water bodies is likely to deteriorate in band status, development proposals in affected areas will have to demonstrate that they would not exacerbate deterioration in the relevant catchment. The council will work in partnership with the Environment Agency, the water companies and other relevant parties to identify the means of reversing the deterioration through appropriate intervention mechanisms prior to the release of any further allocated sites or granting of planning permissions.

Implementation and Monitoring

The policy will be implemented by:

- ensuring that there is a supportive approach to development on appropriate urban sites
- the determination of planning applications on relevant sites.

The policy will be monitored by:

- annual monitoring of housing completions and the preparation of a housing trajectory to set out how the borough will provide a five year supply of housing sites
- annual monitoring of water quality by the Environment Agency.

Policy SS5 – Neighbourhood Planning

The council will support parish/town council and other representatives from local communities in non-parished areas, through the Neighbourhood Planning process.

In the settlements listed below, it will be necessary to identify sites/opportunities to meet the following levels of development, generally in and around defined Settlement Policy Boundaries:

- a) Bramley – at least 200 homes
- b) Kingsclere – at least 50 homes
- c) Oakley – at least 150 homes
- d) Overton – at least 150 homes
- e) Whitchurch – at least 200 homes



A further 150 homes will need to be identified in areas outside of those listed above and it will be necessary to identify sites/opportunities to deliver at least 10 homes within and adjacent to each of the settlements with defined Settlement Policy Boundaries⁷.

The council will support the relevant parish/town council and other representatives from local communities to identify the most appropriate means of meeting this requirement, through Neighbourhood Planning, rural exceptions schemes, or a review of Settlement Policy Boundaries.

The delivery of housing which meets the requirements of this policy will be monitored annually by the council to ensure the housing requirement is met and the council reserves the right to identify opportunities to address any shortfall through the DPD process. For the five named settlements, if a neighbourhood plan/neighbourhood development order (Regulation 16) has not been submitted by April 2017, the council will consider the need to allocate additional sites.

- 4.63 The council strongly supports the principle of Neighbourhood Planning, which includes the development of Neighbourhood Plans and Neighbourhood Development Orders, including Community Right to Build Orders. Neighbourhood planning offers local communities the opportunity to come together and agree on joint aspirations for their area, and consequently guide future development decisions. A number of local guides have been developed by the council to assist local communities through this process, including the Neighbourhood Planning Protocol (2013).
- 4.64 The council continues to support the preparation of Neighbourhood Plans across the borough, and 13 neighbourhood areas have been designated in the borough at time of publication. This includes parished areas where development levels have been set by the above policy. The council will work with these local communities to identify the most appropriate means of delivering the identified levels of development. The council will also support the development of suitable Neighbourhood Development Orders and Community Right to Build Orders which relate to a specific area of land.
- 4.65 Each of the policies in the Local Plan are strategic in nature and therefore all Neighbourhood Plans need to be in conformity with them, unless there is an agreed and significant local justification for an amended approach.
- 4.66 At least 750 homes will be delivered at the five named settlements through this policy, reflecting the size, characteristics, needs and sustainability credentials of these settlements. An additional 150 homes are expected to be delivered through Neighbourhood Planning across the remainder of the borough, outside of those settlements listed in the policy, Basingstoke Town and Tadley. At least ten homes will be delivered primarily within or adjacent to settlements with defined Settlement Policy Boundaries, in addition to other development outside of these areas where growth will reflect local needs and ambitions. Settlements with a defined Settlement Policy Boundary are listed below:

⁷ Excluding Basingstoke and Tadley.