
Examination into the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites

Response of Barton Willmore
(on behalf of Radley College)

Hearing Statement

Matter 2: Unmet Housing Need

June 2018

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Detailed Policies and Additional Site**

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Matter 2: Unmet Housing Needs from Oxford

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**RESPONSES OF BARTON WILLMORE (ON BEHALF OF RADLEY COLLEGE) TO MATTER 2:
UNMET HOUSING NEEDS FROM OXFORD**

1.0 INTRODUCTION

- 1.1 This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2031: Part 2 on behalf of Radley College (hereafter referred to as 'our client').
- 1.2 This statement responds to questions 2.3, 2.4 and 2.6 posed under 'Matter 2: Unmet Housing Needs from Oxford', as identified by the Inspector in his List of Matters and Questions.

MATTER 2: UNMET HOUSING NEEDS FROM OXFORD

2.3 Is the spatial strategy for meeting these unmet housing needs [from Oxford] in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by appropriate evidence?

LPP2 seeks to address the agreed quantum of unmet housing need for Oxford City to be met within the Vale. This has been identified as 2,200 homes, to be met by a combination of the Part 1 strategic allocations and Part 2 additional allocations. As set out in previous representations our client remains in broad support of the Council's general approach to addressing housing needs and considers that, as the quantum of Oxford City's unmet need was agreed in September 2016 (Core Policy 4a) and the LPP1 was adopted in December 2016, it is the responsibility of LPP2 to allocate Oxford City's unmet need plus the remainder of the requirement not allocated within LPP1 (5,321).

Paragraph 2.13 of the LPP2 Publication version states that in addition to addressing the district's overall housing need, any additional housing allocations must be 'appropriately located' to address both the quantum of unmet need to be met within the Vale, and the district's own housing requirements. Paragraph 2.14 goes on to confirm that the Abingdon on Thames and Oxford Fringe Sub Area is closest to and has the most frequent and reliable public transport linkages to Oxford and for these reasons, the Vale's agreed quantum of unmet need for Oxford (2,200 dwellings) is allocated to this Sub-Area as per Core Policy 4a: Meeting Our Housing Needs. Our client supports the general approach of focusing most of the allocated sites within the Abingdon-on-Thames & Oxford Fringe Sub-Area due to its proximity to Oxford City and the associated sustainability of these areas in locational and accessibility terms.

In spatial terms the Council's strategy of meeting Oxford City's unmet housing needs within the Abingdon on Thames and Oxford Fringe Sub Area is therefore considered appropriate. This Sub Area lies closer to Oxford City than the South East Vale Sub Area and the Western Vale Sub Area and as such, in terms of supporting sustainable growth, it is considered logical to locate sites to meet the City's unmet needs in this part of the district.

Core Policy 4a (Meeting Our Housing Needs) refers to three types of site: strategic sites (delivery within LPP1), additional sites (delivery within LPP2) and additional dwellings (e.g. windfalls), which according to the Policy *'will be delivered through Neighbourhood Development Plans or through the Development Management Process'*. Our client considers the approach to allocating strategic sites within LPP1 and additional sites within LPP2 to be wholly appropriate. Our client does however suggest that further consideration is given to the reliance that the Council is placing on Neighbourhood Plans to deliver the 'additional dwellings,' as discussed further below.

The 'additional sites' category – i.e. delivery within LPP2 – reveals a notable variation in terms of the number of units to be delivered on any one site. As indicated within Policy 8a of LPP2 (Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub Area) the proposed housing allocations are located at the Larger Villages of Kingston Bagpuize with Southmoor (600 dwellings); Marcham (90 dwellings); and East Hanney (two allocations totalling 130 dwellings). In addition, 1,200 dwellings are proposed at Dalton Barracks, which falls within the Smaller Village of Shippon.

We note with interest the fact that four of the five sites allocated under Policy 8a are within Larger Villages: defined with LPP1 (Core Policy 3) as *'...settlements with a more limited range of employment, services and facilities. Unallocated development will be limited to providing for local needs to support employment, services and facilities within local communities.'* We also note that the closest of the Larger Villages to Oxford City are Marcham and Kingston Bagpuize, approximately 10 miles away. Furthermore, we note the Sustainability Appraisal underpinning LPP2 (September 2017) refers to Oxfordshire County Council's (OCC) consultation response wherein OCC consider that Kingston Bagpuize with Southmoor is 'red' rated, i.e. 'least well connected' in the main because of its distance from Oxford and a lack of current or proposed sustainable transport options.

The decision to allocate relatively large sites in Larger Villages that are some distance from Oxford City is therefore seemingly at odds with the overarching objective of delivering new homes to meet the unmet needs of the City and we question whether it is the most appropriate option.

The proposed allocation at Dalton Barracks quite clearly forms a very significant proportion of the development that is expected to come forward within the Abingdon-on-Thames & Oxford Fringe Sub-Area over the Plan period. Of the total 3,850 dwellings expected to come forward within the Sub-Area during the Plan period, some 1,200 are proposed at the Dalton Barracks site. Indeed, the number of dwellings to be delivered on a single site as part of LPP2 (1,200 dwellings) is comparable to the total dwellings proposed on the four individual strategic sites for the Abingdon-on-Thames and Oxford Fringe Sub Area within LPP1.

Whilst our client does not wish to make specific comment in relation to the sustainability or suitability of the allocated sites, we do question the reliance on these relatively large sites delivering such a high proportion of identified need and would suggest, given the role of LPP2 to deliver 'additional sites', that a number of smaller sites may be better placed to meet this need in the short to medium term. The spatial strategy for meeting unmet housing needs within the Sub Area as drafted may therefore not be the most appropriate when considered against this approach as a reasonable alternative. Indeed the Inspector for LPP1 reflected on the fact that the Council had appraised a 'spectrum' of sites of varying sizes and praised this approach, however the Council do not appear to have carried this approach forward into LPP2.

We consider this approach to be more consistent with the original aims of LPP1 and that the LPP2 can achieve improved flexibility by focusing on the scope for allocating a broader range of sites of varying scales, some of which can typically be brought forward sooner, with on-site completions achieved soon after commencement.

Windfalls

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 divided between the sub-areas 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.

Our client notes that within the LPP2 - Preferred Options document, the windfall allowance was 820 dwellings over the Plan period. Accordingly, the windfalls allowance has risen by 260 dwellings over the Plan period in the two years since that version of LPP2 was released. We note that the LPP2 Publication Version confirms that the windfall figure of 1,100 dwellings has been updated to reflect past delivery.

We refer to page 32 of Topic Paper 2 wherein 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 as such the Council increased its windfall allowance from 70 dwellings a year to 100 dwellings a year.

The NPPF states the following 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.”

Although the Council has clearly considered historic windfall delivery rates, there does not appear to be ‘compelling evidence’ for its generous windfall allowance of 1,100 dwellings.

Table 4.3 on page 32 of Topic Paper 2 provides the completions on small housing sites between the period 2011/12 to 2016/17. The average completions across this period equates to 169 dwellings per annum. However, it is noted that this is skewed by years 2015/16 which saw 186 completions and 2016/17 which saw 448 completions. Removing these two specific years and calculating the average dwellings per annum between years 2011/12 to 2014/15 results in an average delivery figure of 95 dwellings per annum. Should the figures for all years be included, we consider that further justification would be helpful particularly for year 2016/17 (448 dwellings) as this is not reflective of any of the previous years.

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 or expected future trends. It is considered that further clarification in this regard is required to appropriately justify the windfall allowance in accordance with paragraph 48 of the NPPF.

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.”

As explained in previous submissions, Barton Willmore has undertaken a review of the Neighbourhood Plans that have either been adopted or currently emerging. We note that at the time of writing there are five adopted Neighbourhood Plans. Out of these five adopted Neighbourhood Plans, it is our understanding that only the Drayton Neighbourhood Plan allocates sites for housing. The settlement of Drayton lies within the Abingdon-on-Thames & Oxford Fringe Sub-Area.

It is accepted that some Neighbourhood Plans are currently being prepared, for example our clients are fully aware of progress with the emerging Radley Neighbourhood Plan, in part because of discussions relating to the delivery of the strategic site at North West Radley which falls within its area. The dependence the Council places on Neighbourhood Plans does however raise concerns as Neighbourhood Plans do take a long time to become 'made'; given the level of work involved and the inherent nature of the planning process,. Of those Neighbourhood Plans that are now made, there is disparity between LPP2 and the anticipated delivery figures of Neighbourhood Plans.

We suggest therefore that the Council may have overestimated the amount of housing allocations which are expected to come forward within the district over the Plan period. Our client is concerned that in this regard the Plan is not flexible and has not sufficiently demonstrated deliverability of this component of the housing land supply.

This conclusion further supports our view that additional allocations could be reasonably be included within the LPP2, to account for the disparity.

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. Publicly available information suggests that the site is not due to come forward until 2029. However, our client notes 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"*. However, there is no evidence provided within the LPP2 - Publication Version or its evidence base which details the dialogue between the DIO and the District Council to justify that 1,200 homes can be delivered before 2029.

In addition, a Housing Study prepared by Wessex Economics, dated May 2017, which forms an evidence base to the Draft Vale of White Horse and South Oxfordshire District Joint Housing Delivery Strategy document that 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.

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 is likely to deliver most dwellings post 2031. Accordingly, we maintain that LPP2 should allocate 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 overall housing requirement.

Examples of this includes 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. These include the Triangular Field (ABIG05); and land at Gooseacre.

2.4 Is the stated strategy for meeting these unmet needs in the Abingdon on Thames and Oxford Fringe Sub Area followed through in the LPP2?

No. We do not consider that the stated strategy for meeting the unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area has been followed through in LPP2.

LPP2 is considered flawed to the extent that it fails to allocate development at sustainable settlements in closer proximity to Oxford City than the proposed allocations identified under Policy 8a, as per our comments under 2.3 above.

We do not consider the Plan to be positively prepared as it allocates a notable proportion of new housing within Larger Villages which are arguably less sustainable than several other settlements within the Sub Area that lie closer to Oxford City. In this regard LPP2 as drafted does not support the spatial strategy of LPP1 as it overlooks opportunities to allocate several smaller, sustainable sites that could make a valuable contribution to housing delivery in the short to medium term.

2.5 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site – Dalton Barracks) and sites outside the Green Belt the most appropriate?

Paragraph 2.67 of LPP2 refers to the release of Green Belt land through the Local Plan process and cites the Inspector's Report into LPP1, wherein the Inspector states that *'...retaining these parcels of land in the Green Belt now would not prevent their deletion from Green Belt through the Part 2 or any other local plan or local plan review, if the necessary exceptional circumstances were to be demonstrated.'*

Evidently the LPP1 Inspector was of the view that where exceptional circumstances are demonstrated, it would be appropriate for further Green Belt parcels to be released through LPP2. The Council have taken the view that in order to meet the housing needs of the district and the unmet need from Oxford City, there are exceptional circumstances to remove land from the Green Belt at the Dalton Barracks site.

We consider that the decision to release one large, single site from the Green Belt as part of LPP2 is a missed opportunity. Given that the Inspector for LPP1 has made plain that there is scope under LPP2 to release several smaller additional sites, we suggest that the Council could adopt a more positive approach to bringing forward several sites in areas which lie in closer proximity to Oxford City and which have already been identified as suitable for release by virtue of previous Green Belt reviews.

We suggest that careful consideration is given to whether large sites such as Dalton Barracks will deliver as proposed and consider the consequences to the 5-year housing land supply if this does not occur. The Local Plan should plan for these eventualities where the outcome is uncertain, either via reserve sites or a larger number of smaller allocations.