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

18th December 2014

Dear Sir/Madam,

VALE OF WHITE HORSE LOCAL PLAN 2031
PART 1 – STRATEGIC SITES AND POLICIES
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 emerging Local Plan 2031 – Part 1: Strategic Sites and Policies. 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, most recently in respect of the site known as Land North of Hazel Road, Botley.

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). However, as has been suggested in previous representations, the University is concerned that the role of smaller scale proposals on suitable deliverable sites, such as that at Hazel Road, should be considered within Part 1 of the Plan in order to ensure the Council delivers growth in the short term.

The Strategic Approach

The Local Plan 2031 Part 1 makes provision for 20,560 new homes to be delivered during the plan period (2011-2031). This reflects the objectively assessed need, as identified by the Oxfordshire Strategic Housing Market Assessment (SHMA) (February 2014).

The Plan confirms that 13,960 dwellings will be delivered through strategic (200+ dwellings) allocations and that, at present, 1,900 dwellings remain to be identified and will be allocated through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management process.

This strategic approach and the provision of new homes required over the plan period remains the same as that proposed by the Local Plan: Housing Update Delivery (February 2014). The University representations made in respect of the previous version of the Plan, noted that whilst such an approach was necessary as part of a long term approach to the growth of the Vale, for the Council to deliver the required growth in the short term – as is required to do so in order to rectify an



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acknowledged five year housing land supply shortfall – opportunities to deliver other appropriate sites such as Hazel Road should not be overlooked at this stage.

The University cited Paragraph 153 of the NPPF which states that *"each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified"*.

Topic Paper 4: Housing (November 2014) contained within the Plan evidence base, summarises the Council's approach to housing and explains how the Council identified overall housing targets. Chapter 3 of the Paper explains that the responses to each stage of the Plan consultation process were used to help inform the current Plan. In regards to 'amount of housing', paragraph 3.3 states that *"many of the concerns raised related to the proposal for relying on relatively few large sites and comments around the need for contingency"*.

The Topic Paper concludes (paragraphs 4.5) that assessment of the policy context has made clear that the amount of housing set out in the Local Plan 2031 Part 1 must be based on objectively assessed need based, rather than a target set at a regional level – which in this instance in the 10,280 homes identified by the SHMA.

The Local Plan and supporting evidence documents do not appear to explain the Council's justification for proposing a two part Plan. This is particularly pertinent given that the Council has acknowledged a shortfall in housing delivery in the short term.

As the University has highlighted during previous consultations (much of which is repeated again below), the Council has indicated that they are unable to rectify the current five year housing land supply shortfall and therefore, opportunities to deliver small scale sites should not be overlooked at this stage. Development of strategic sites (i.e. over and above 200 units) may take time to deliver and there is a clear role for the smaller proposals such as that at Hazel Road in delivering this short term need.

Barton Willmore has submitted representations to earlier SHLAA consultations in respect of the site and supported the Council's previous stance that the site is wholly suitable site for housing. The Council has previously recognised that the site has no constraints to being brought forward for development and we have and continue to fully endorse this position. The site north of Hazel Road lies within a highly sustainable site close to the centre of Botley and within each reach of Oxford City Centre by public transport. Importantly the site constitutes 'white land' on the proposals map, meaning that it is without any specific designation or allocation in the Local Plan and accordingly free from any restrictive planning policies. It represents a valuable opportunity to deliver small scale development (circa 50 dwellings) in the short term.

Housing Requirements

Core Policy 4 (Meeting our housing needs) acknowledges that 1,900 dwellings remain to be identified and will be allocated through the Local Plan Part 2, Neighbourhood Plans or the Development Management process.

Core Policy 8 (Abingdon-on-Thames & Oxford Fringe Sub-Area) confirms that at least 5,438 new homes will be delivered within the sub-area during the plan period, 1,696 of which remain to be identified and will be allocated through the Local Plan 2031 Part 2 or Neighbourhood Development Plans or through the Development Management process.

The Council acknowledges within Topic Paper 4 that it *"cannot fully make up its previous undersupply within the first five years of the plan because when a 20% supply buffer is included the sheer scale of frontloaded growth required to do so it is not realistically deliverable (taking into account the delivery implications of bringing forward multiple sites in close proximity are considered, ie. market behaviour and competition)"*.

Given the Council has acknowledged that it is unable to achieve a five year housing land supply in the short term, the University considers that identification of suitable site smaller than 200 dwellings be included at the current stage of the Plan.

Duty to Cooperate

Core Policy 2 (Cooperation on unmet need) explains that the Council will fulfil its duty to cooperate by working effectively with all other Oxfordshire local authorities to meet the objectively assessed need for economic and housing growth. The Policy goes on to state that *"the Council recognises that Oxford City may not be able to accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary. Whilst the extent to which Oxford City can meet its own needs is robustly tested and agreed, the Council will first seek to meet its own housing needs in full, to help ensure that the needs of both the district and the housing market area as a whole are met as quickly as possible. If, following joint work, it is identified and agreed, either through the Oxfordshire Growth Board or through an adjoining local plan examination, that any unmet housing need is required to be accommodated within this district, the Council will either:*

- *undertake a full or focused partial review of the Local Plan 2031, or*
- *allocate appropriate housing sites through a subsequent development plan document in conformity with the Spatial Strategy set out in the Local Plan 2031.*

The appropriate approach will depend on the scale of the unmet need to be accommodated.

The University understands that the recently completed SHLAA published by Oxford City Council has concluded that land within the local authority boundaries can only take between 32 and 43 per cent of the city's housing need up to 2031 - leaving a shortfall of up to 21,800 further homes to meet the overall need within Oxford City itself.

The University considers the shortfall identified within the Oxford City Council SHLAA only reinforces the need for the Council to consider within the Plan, the role which Botley could play in helping the Council to achieve both its own housing targets within the short term and given its location within the County (and adjacent to Oxford City), Botley should not be overlooked in terms of accommodating a proportion of Oxford City's unmet housing need.

Settlement Hierarchy

Core Policy 8 confirms that development within the Abingdon-on-Thames and Oxford Fridge Sub-Area should be undertaken in accordance with the Settlement Hierarchy (as set out within Core Policy 3):

- *Market Town*
- *Local Service*
- *Larger Villages*
- *Smaller Villages*

The hierarchy gives priority to the Market Town of Abingdon-on-Thames, whilst Botley is defined as a 'Local Service Centre'.

The University recognise that whilst Botley does not represent a 'market town' in the traditional sense; it is however within a sustainable location which is well served by public transport and provides a wide range of services.

The University note that Core Policy 11 (Botley Central Area) sets out proposals for comprehensive retail-led redevelopment (comprising a large supermarket, shops, offices, hotel, car parking) of the Botley central area. This redevelopment is likely to further improve the provision of services and enhance the sustainability credentials of Botley as a 'local service centre'. The enhanced

facilities/redevelopment of the centre of Botley will, in turn, further emphasise the opportunity for additional homes to be provided which are within easy reach of the centre.

Green Belt

As part of the strategy for meeting its growth requirements, the Plan proposes the release of some sites from the Green Belt for development following a comprehensive Green Belt Review. **Core Policy 13** (The Oxford Green Belt) confirms that *"the Oxford Green Belt area in the Vale, as amended following local Green Belt Review, will continue to be protected to maintain its openness and permanence. Development will be permitted in the following settlements, which are inset to the Green Belt (as shown on the Adopted Policies Map), where the proposed development is within the existing built area of the village and in accordance with Core Policies 3 and 4:*

- • Appleton
- • Botley
- • Cumnor
- • Farmoor
- • Kennington
- • Radley and
- • Wootton

The text within Core Policy 13 indicates that the Green Belt boundary has been amended following the Green Belt Review. However, at present, the Local Plan does not appear to contain a map which clearly shows the amended boundaries.

The University note that within the evidence base is a 'draft proposals map' for the Abingdon-on-Thames and Oxford Fridge Sub-Area, which is assumed to show the changes – including the removal of the two areas north of Botley described as *"To the north (Area 1) to follow the A420 / A34 and the line of trees to the west. To the north-west (Area 2) the revised boundary again follows the A420 and a clear tree line to the east"*. However, at the time of writing, the plan was unavailable due to a technical error on the website.

Figure 5.1 of the Local Plan contains a map of the District, which, when closely inspected, does appear to indicate that the Green Belt boundary has been amended (in accordance with the recommendations of the Green Belt Review). Therefore, at this moment in time, the only way to identify the extent of the revised boundary is to read the Green Belt Review included within the Council's evidence base.

The University would wish to see inset maps which detailed the proposed Green Belt boundary changes to give clarity to the changes proposed within the Local Plan.

Conclusions

The University supports the proactive approach that has been taken by the Council in seeking to accommodate the challenging growth requirements set by the SHMA and recognises that release of strategic Green Belt sites to accommodate this level of new housing is unavoidable. That said, the University is of the view that omitting to recognise the role of smaller scale proposals in delivering growth in the short term is at odds with the overarching objective to remedy an identified five year housing land supply shortfall.

The recent confirmation that Oxford City Council is only able to take between 32-43% of its own housing need, only reinforces the need for the Council to consider within the Plan, the role which Botley could play in helping the Council to achieve the short term housing delivery.

The University's land at Hazel Road lies within a highly sustainable site close to the centre of Botley and within each reach of Oxford City Centre by public transport. Moreover the site constitutes 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.

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,



MICHAEL GRESLOW
Senior Planner

cc. Gary Lloyd - University of Oxford