

Ian Kemp
Programme Officer

16 Cross Furlong
Wychbold, Droitwich Spa, Worcestershire, WR9 7TA
Phone: 01527 861 711 Mobile: 07723 009 166
E-Mail: idkemp@icloud.com

Adrian Duffield
Head of Planning
South Oxfordshire & Vale of White Horse District Councils
135 Eastern Avenue
Milton Park
Milton
Abingdon
OX14 4SB

By email

7 June 2016

Dear Mr Duffield

Vale of White Horse Local Plan 2031: Part 1 Examination - Inspector's Interim Findings

1. Introduction

1.1 Following the completion of the Stage 1 and Stage 2 hearing sessions, and based on all that I have now read, heard and seen, I write to set out my interim findings on the Vale of White Horse Local Plan 2031: Part 1. However, I emphasise that this is not my final report on the Examination and that these findings may be subject to change dependent upon, amongst other things, the Council's response to my requests below and the results of Sustainability Appraisal, Habitats Regulations Assessment and consultation on proposed modifications.

1.2 In essence my findings fall into one of four categories:

- a. Aspects of the plan which I consider are likely to be found sound/legally compliant. In this letter I deal with these matters very briefly and, as highlighted by a * in the relevant paragraphs, I will set out my reasoning for these conclusions in my final report;
- b. Aspects of the plan which I consider are likely to be found sound, subject to main modifications along the lines of those discussed at the relevant hearing sessions. Again, as highlighted by a * in the relevant paragraphs, I will set out my reasoning for these conclusions in my final report. I have read the draft modifications which the Council has prepared in the light of the hearings, a number of which are likely to need revision to ensure that the plan

would be sound. I will contact the Council in due course with detailed comments on the proposed modifications.

- c. Aspects of the plan (relating to housing allocation sites 12 and 13 and land proposed to be removed from the Green Belt but not allocated for any particular use) which I consider are unsound but which could potentially, through modification (ie not one currently proposed by the Council), be made sound. These are matters on which I am inviting the Council to confirm how it wishes to proceed; and
- d. Aspects of the plan (relating to housing allocation site 6 and Botley Central Area) on which I need further evidence before I can reach a conclusion in respect of soundness. However, whilst important in their own right, these are matters in relation to which I envisage the plan is likely to be capable of being found sound, albeit potentially subject to modification.

2. Duty to Co-operate

- 2.1 I conclude that the Council has adequately discharged its Duty to Co-operate in preparation of the plan.*

3. Objectively-Assessed Need for Housing

- 3.1 I am satisfied that 20,560 dwellings is a soundly based figure for the objectively-assessed need for housing in the district for the plan period.* However, this does not automatically mean that the appropriate housing requirement figure for the plan is also 20,560 and I deal with possible constraints and my conclusions on the housing requirement figure in section 12 below.

4. Unmet Housing Needs from other Districts

- 4.1 I am satisfied that, at the present time, the plan's broad approach to addressing, within the Vale, potential unmet housing needs from other districts is soundly based – ie that provision, in overall numerical terms at least, for unmet housing needs from other districts, over above the Vale's own identified needs, will be made in a subsequent DPD. However, in the interests of clarity and to incentivise the Council to ensure that such needs are planned for in a timely manner, modification of policy CP2 along the lines of that discussed at the hearings is necessary.* As previously mentioned I will contact the Council separately regarding the modifications it has proposed to date ('Strikethrough Local Plan'), but I note that whilst the Council's draft modification of paragraph 1.28 of the supporting text broadly reflects the discussions at the Stage 1 hearing session, the most recent draft proposed wording of policy CP2 is, seemingly, not entirely consistent with this supporting text. Whilst it is appropriate that the extent of provision with the Vale for unmet housing

needs from other districts is ultimately defined through a DPD for the Vale, it is equally appropriate for me to ensure that the Council is incentivised to adopt such a plan as quickly as possible.

- 4.2 One of the key reasons for my conclusion on the issue of unmet housing needs is the fact that, as detailed in section 8 below, the plan will enable some 1500 or so new dwellings to come forward in the Abingdon-on-Thames and Oxford Fringe area (sites 1,2,3 and 4) which are very unlikely to secure planning permission unless and until the plan is adopted. Even in the absence of agreement on the level and distribution of unmet needs, dwellings on these sites would be as likely to be occupied by households comprising part of Oxford City's housing need as that of the Vale, notwithstanding the wishes or policies of the Councils.
- 4.3 I understand that it is intended that the Oxfordshire Growth Board will publish a Memorandum of Understanding by the end of September 2016 setting out a distribution between the districts of unmet housing needs. It is, thus, very likely that this will be published before this plan is adopted. There appears to be some disagreement over the extent to which the distribution will be a definitive figure and ideally the Statement itself will clarify this point as far as is possible. However, even if it is a definitive figure, it would then inevitably take some time for the Vale to identify, test and consult on appropriate sites to fully meet the agreed figure. Consequently, if this plan were to be delayed to address the agreed distribution, it would also delay the delivery of dwellings on sites 1,2,3 and 4 to the detriment of actually providing for (as opposed to simply including allocations within a plan for) at least some of Oxford City's housing needs.
- 4.4 However, obviously it will be necessary for me to keep this particular finding under review in the light of the emerging work of the Growth Board.

5 Settlement Hierarchy

- 5.1 Subject to the receipt of further information in respect of East Hanney (see section 10), and to a modification necessary to address factual errors, I am satisfied that the settlement hierarchy (policy CP3) is soundly based.*

6. Housing Supply Ring Fence

- 6.1 I am satisfied that the general principle of a housing supply ring fence for the Science Vale area is sound.* However, to ensure effective operation of the ring fence, modification of policy CP5 is necessary to align the ring fence area with the boundary of Science Vale and to explicitly state how it is intended that the policy will be applied. I will provide detailed comments on the Council's currently proposed modification of policy CP5 in due course.

7. Employment Land

- 7.1 I am satisfied that the provision for meeting business and employment needs set out in policy CP6 is soundly based, although a modification to the wording of the policy or its supporting text is likely to be necessary in the interests of clarity.*

8. Green Belt

- 8.1 In view of the level of employment growth envisaged in Science Vale it is appropriate that the majority of new housing during the plan period is located in the South East Vale sub-area of the district. However, the Abingdon-on-Thames and Oxford Fringe sub-area contains the Vale's largest settlement (Abingdon) in addition to the local service centre of Botley and a number of larger villages, including Radley and Kennington. A significant part of the OAN arises from forecast demographic changes, which point to a need for new housing in this part of the district. This part of the district is also closest to Oxford City which, notwithstanding the growth of Science Vale, is likely to remain a very important centre for employment and services for residents of the Vale. The plan's indicated requirement for housing in this sub-area is thus soundly based.
- 8.2 The built-up areas of Botley, Radley and Kennington are very closely bounded by Green Belt, as are the eastern, northern and western sides of Abingdon. Whilst land to the south of the built-up area of Abingdon is outside the Green Belt, access difficulties and potential flooding render its development for housing highly problematic. Some new housing is appropriate to support the villages in the southern and western parts of the Abingdon-on-Thames and Oxford Fringe sub-area (which lie beyond the Green Belt). However, given their distance from and limited public transport links with Abingdon, Botley and Oxford, they 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.
- 8.3 Given this situation I consider that it was appropriate for the Council to undertake a review of the Green Belt boundaries and, having regard to all that I have read, heard and seen, I conclude that the exceptional circumstances exist to justify removing from the Green Belt the sites allocated for housing in the plan to the north of Abingdon and at Radley and Kennington (sites 1, 2, 3 and 4).* I deal below with the other parcels of land at Abingdon, Radley and Kennington which are proposed for deletion from the Green Belt.
- 8.4 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 indicated above. 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. Whilst there is interest in developing some of these parcels of land for housing it has not been argued that any could accommodate the plan's minimum threshold of 200 dwellings. My conclusion on the appropriateness of this threshold is set out section 13 below.

- 8.5 Given their distance from housing allocation sites 1,2,3 and 4 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, defensible and permanent Green Belt boundaries at Abingdon, Radley and Kennington.
- 8.6 I am also unconvinced by the Council's contention that these are all parcels of land which make little or no contribution to the purposes of including land in the Green Belt as, if nothing else, it appears to me that many of them prevent encroachment of the countryside. Moreover, based on the limited reasoning set out in the Green Belt Review, it is unclear to me why some parcels of land at/adjacent to specific settlements are proposed to be removed from the Green belt whilst other, apparently similar, parcels of land at/adjacent to the same settlements are not.
- 8.7 The Council has argued that, whilst not currently identified for housing, these parcels of land could potentially come forward for such use as part of the 1000 dwellings which policy CP4 indicates will be allocated through Neighbourhood Plans or the Local Plan Part 2, and/or to meet unmet needs from other districts. I note that the plan does not identify these parcels of land as "safeguarded land" and nor do I consider that they could be so classed given the statement in the Framework that such land is to meet longer-term development needs stretching well beyond the plan period. Secondly, based on what I have read and heard, it appears to me unlikely that many such allocations would come forward through Neighbourhood Plans. Furthermore, the Council has accepted that the total amount of land proposed to be deleted from the Green Belt across these parcels of land would be likely to far exceed that required to meet the Vale's yet to be allocated housing land. However, retaining these parcels of land in the Green Belt now would not prevent the deletion from Green Belt of any of them through the Part 2 plan if the necessary exceptional circumstances could be demonstrated at that time.
- 8.8 Moreover, in finding the plan's overall approach to addressing unmet housing needs from other districts sound, I concur with the Council's fundamental argument that such needs cannot be soundly planned for when their total amount and appropriate distribution are yet to be agreed. In this context 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

and the yet to be agreed share of unmet needs from other districts to be accommodated in the Vale. Until the Growth Board agrees the distribution of any unmet needs between the Oxfordshire districts it will not be possible to determine how much land in the Vale will be required to meet these needs. Consequently, the 15 or so parcels of land proposed to be deleted from the Green Belt might prove to be either insufficient or more than is required.

- 8.9 Policy CP2 indicates that a full strategic review of the whole Oxford Green Belt will be undertaken as part of the Oxfordshire Growth Board's work in respect of addressing unmet housing needs and identifies that any resulting alterations to the Green Belt boundary would be progressed through a full or partial review of the Local Plan or separate DPD. The Council is now proposing a modification to make clear that the Part 2 plan will allocate sites to meet the Vale's share of unmet housing needs.
- 8.10 Having regard to the Framework it is not ideal for a Local Plan to include alterations to Green Belt boundaries and also an indication that further alterations may be necessary during the plan period. However, any such alterations could only come forward through a new or reviewed Local Plan and I conclude that this approach is much preferable to deleting land from the Green Belt and not allocating it for any purpose when there is a significant risk that the land would be either insufficient, or more than is needed, to meet yet to be determined housing needs. For these reasons I conclude that, at the present time, the exceptional circumstances necessary to justify removing from the Green Belt the parcels of land at Botley, Cumnor, Wootton and Appleton do not exist.
- 8.11 The plan also proposes the removal from the Green Belt of the built-up area of the 'smaller' village of Farmoor, such that it would be 'inset' within the Green Belt. Whilst this would bring Farmoor in line with the already 'inset' settlements of Appleton, Botley, Cumnor, Kennington, Radley and Wootton, I have seen no detailed evidence to justify this particular change. Moreover, it is unclear to me why Farmoor should be an 'inset' village when other 'smaller' villages (as defined by policy CP3), including Dry Sanford, Shippon, South Hinksey, Sunningwell and Wytham would remain 'washed-over' by the Green Belt. If and when a subsequent review of the Green Belt takes place it would make sense to consider the appropriateness of each of these villages as being either 'inset' or 'washed-over' by the Green Belt. However, at the current time, I conclude that the exceptional circumstances necessary to remove Farmoor from the Green Belt do not exist.
- 8.12 A representation has argued that the plan should remove from the Green Belt the Harcourt Hill Campus of Oxford Brookes University. The parcel of land concerned is already substantially built-up and it appears to me that it is likely to be only through redevelopment at a much greater height than currently exists that new building would materially reduce the openness of the Green Belt or affect the setting of Oxford City. Moreover,

the effect on Oxford's setting would be much the same if tall buildings were to be developed at the immediately adjacent parts of Harcourt Hill and Botley which are not within the Green Belt, not that I have read or heard anything to suggest that this is likely. Policy CP9 specifically seeks to prevent development at the campus which would harm the setting of Oxford and this would apply whether or not the campus is in the Green Belt. On the other hand, removing the campus from the Green Belt would leave an awkward, and undesirable in planning terms, 'island' of Green Belt at Raleigh Park. To this extent it would make sense to consider the case for the campus's removal from the Green Belt if and when the Green Belt boundary in the Botley area is more widely reviewed, as indicated above. In the meantime, and having regard to the flexibilities set out in national policy in terms of infilling/redevelopment of previously developed sites in the Green Belt together with the requirements of policy CP9, I conclude that the campus's continued inclusion within the Green Belt is unlikely to significantly prejudice or make difficult appropriate redevelopment at the campus. The retention of the site within the Green Belt for the present time is therefore soundly based.

- 8.13 In addition to housing allocation sites 1, 2, 3 and 4 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 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. 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. On this basis I conclude that the exceptional circumstances necessary to remove land from the Green Belt only exists in relation to housing allocation sites 1, 2, 3 and 4.

Requested response 1: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to retain the existing Green Belt boundaries, other than in respect of housing allocation sites 1, 2, 3 and 4.

9. *Housing Allocations in the North Wessex Downs AONB (sites 12 and 13)*

- 9.1 The Plan envisages that housing allocation sites 12 and 13, which are located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), would be developed for around 550 and 850 dwellings respectively. This would be major development, which the Framework indicates should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. The Framework advises that in considering applications for such development assessment should be made of the need for the development and its impact on the local economy, the scope for developing elsewhere outside the AONB or meeting the need for the development in some other way, and any detrimental effect on the environment, the landscape and recreational opportunities.
- 9.2 In determining whether or not these allocations in the plan are soundly based I have therefore considered whether it is likely that the exceptional circumstances necessary to permit applications for housing development on the sites would reasonably be considered to exist.
- 9.3 Whilst it is not specifically referred to in the plan itself, in terms of need for housing development in the AONB it has been argued that to fully realise the economic growth potential of Harwell Campus, which itself is of national importance, it needs to evolve from a science and innovation park to a world class campus environment offering a 'work-live-play community'. The integration of housing with the employment function at the campus is contended as being essential to this and reference has been made to a number of locations across the world where such communities exist.
- 9.4 I recognise the importance of Harwell Campus to the local, regional and national economy and do not doubt that some existing or potential employees at the campus would wish to live there. However, there is little, if any, evidence to support the contention that this is essential to the realisation of the employment growth which the plan and the Oxfordshire Strategic Economic Plan (SEP) envisage taking place at Harwell in the period to 2031. Whilst I note that the Oxfordshire LEP (and some others) strongly supports the housing allocations, its SEP of March 2014 makes no reference to the 'work-live-play community' of the scale now proposed. It does however refer to the development of the Research Village at the campus involving the creation of the "...feeling of a campus-based university with 5 accommodation blocks (each with up to 40 bedrooms with shared kitchen facilities on each floor and 5 self-contained apartments for those visiting for longer periods)...." I understand that planning permission already exists for such a development.
- 9.5 The written evidence proposing/supporting the 'work-live-play community' approach to the development of the campus mostly post-dates the publication of my questions for the relevant part of the Examination and

none of it quantifies, in terms of likely job creation, the economic importance of either permitting or refusing housing development in the AONB. Moreover, despite a specific request from me at the hearing for evidence on the point no details have been provided of any organisations who have indicated that they would only, or even be more likely to, locate at Harwell if it were to be developed as a 'work-live-play community'. The Oxford and Oxfordshire City Deal and the Oxfordshire Innovation Engine Report: Realising the Growth Agenda and evidence in the form of "third party validations" refer to the need for convenient and affordable housing (particularly to rent) although there is nothing to suggest that this could not be appropriately provided a short distance from the campus outside the AONB. The validation from a university professor does refer to the value of on-campus accommodation although specifies the need for affordable rooms and apartments for several days to carry out experiments or for longer periods for the training of PhD students. This would appear to indicate a need for the campus-based university style accommodation referred to in the SEP and for which permission already exists.

- 9.6 Other evidence indicates that 25% of those currently employed at Harwell would consider moving to the campus if dwellings to rent were available there. However, clearly these people have been attracted to work at Harwell notwithstanding the lack of housing at the campus and I have seen no convincing evidence to indicate that any existing or new employers at Harwell would, in the future, not be equally successful in attracting people to work there as long as there is sufficient suitable housing within the Science Vale area generally.
- 9.7 I therefore conclude that the need for a 'work-live-play community' at Harwell, and thus housing on sites 12 and 13 within the AONB, has not been demonstrated. Moreover, there is no convincing evidence to indicate that refusing such development would have an adverse effect on the local economy.
- 9.8 Turning to alternative sites I recognise that the proposed 'work-live-play community' at Harwell could not be delivered by development outside of the AONB. However this matters little given the lack of a demonstrated need for such a form of development. Nonetheless, the 1400 dwellings are also intended to contribute towards the Science Vale's element of the district's objectively-assessed need for housing. There is little to suggest that, if this housing is needed (see paragraph 9.12 below), alternative sites for it, outside the AONB but within Science Vale, could not be found. However, I appreciate that housing on sites 12 and 13 could be accommodated without the need for significant highways infrastructure upgrades which might be necessary if the housing were to be provided for elsewhere outside the AONB. Moreover, notwithstanding the lack of evidence of need for housing of the scale proposed at the campus, I recognise that, were it be provided, there would potentially be

sustainability benefits in terms of shorter journeys to work (which would also be more likely to be made on foot/by cycle) for residents working at the campus.

- 9.9 In terms of the landscape and recreational opportunities I consider that, subject to very careful design and landscaping, housing development on sites 12 and 13 would not be prominent when viewed from the surrounding higher ground, most notably the Ridgeway path to the south. Moreover, it would be seen in the context of the much larger and more prominent existing Harwell Campus development. However, the developments would be very prominent from the roads and footpaths which bound sites 12 and 13. I understand that the footpaths which bound the north and east sides of site 13 are well used by residents of Harwell and Chilton villages in particular. Whilst landscaping might substantially obscure views of the dwellings themselves it would also all but eliminate the current, attractive wide open views across agricultural fields to the Downs beyond from these footpaths. Harm would thus be caused to the landscape of this particular part of the AONB and to the recreational opportunities it currently provides.
- 9.10 In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers. Nonetheless, and given that the campus will become an increasingly large centre for employment, there would potentially be some highway infrastructure and travel-to-work sustainability benefits in locating housing at sites 12 and 13 as opposed to elsewhere. The Framework's exceptional circumstances and public interest test would be ultimately applied as part of the consideration of planning applications for housing on these sites, having regard to the evidence available at the time. However, balancing my findings in respect of all that I have read, heard and seen at this point in time, I consider it unlikely that the exceptional circumstances necessary to approve such applications would reasonably be considered to exist. Consequently, the plan's housing allocations on sites 12 and 13 are not soundly based.
- 9.11 An alternative proposal to housing allocation site 13 has been put forward, involving the development for housing within the northern part of the Harwell Campus itself. This would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously-developed land. However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus. Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist.

- 9.12 I conclude that modification of the plan to delete sites 12 and 13 is thus necessary. As detailed in section 13, even without these sites the plan would provide for a five year supply of deliverable housing land, and sufficient dwellings district-wide for the plan period as a whole. However, it would reduce the potential supply of housing in the South East Vale and the Council may wish to consider the need to allocate replacement sites in this area through the Part 2 plan. However, there would be little reason to delay adoption of the Part 1 plan by seeking to allocate replacement sites at this stage.

Requested response 2: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to delete housing allocation sites 12 and 13.

10. Housing Allocation site 6, East Hanney

- 10.1 I understand that since the submission of the plan 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. Moreover, the Council has recently refused permission for an application for housing on site 6, comprising slightly less than the 200 dwellings which the plan envisages for this site, raising, amongst other matters, concerns about the density of the development.

Requested response 3: in order to assist my determination of whether or not this allocation is soundly based I would be grateful if the Council would formally consider if, in the light of a review of current evidence, housing development of the scale envisaged in the plan is appropriate in East Hanney and if the site 6 housing site allocation is deliverable.

11. Other Housing Allocations

- 11.1 Subject to modifications to the relevant policies and plan appendices as discussed at the hearings, I am satisfied that housing allocation sites 5, 7, 8, 9, 10, 11, 14, 15, 16, 17, 18, 19, 20 and 21 are soundly based. *

12. Housing Requirement

- 12.1 Having regard to the sites included in the Council's housing trajectory for the plan period (see section 13 below) and all that I have read, heard and seen, I conclude there are no constraints which would justify the housing requirement for the district being below the objectively-assessed need.* Consequently, the new housing requirement for the Vale for the plan period of 20,560 dwellings is soundly based. However, as detailed in

section 4 above, the housing requirement for the district may need to be increased if, in due course, the Oxfordshire Growth Board determines that there are unmet housing needs from other districts which should be provided for within the Vale.

13. *Five Year Supply of Deliverable Housing Land and "Omission" Sites*

13.1 Having regard to all that I have read and heard on the issue, I conclude that the evidence (updated to 31 March 2016, doc PHD2) indicates that, on the Council's preferred measure, a 7.2 years supply of deliverable housing land can realistically be demonstrated across the district as a whole.* This calculation (set out in Appendix 1 of this letter) excludes housing allocation sites 12 and 13, in accordance with my conclusions set out in section 9 above.

13.2 The Council's approach to measuring housing supply applies a 20% buffer to account for past under-delivery and assumes that the shortfall in delivery would be addressed across the rest of the plan period (the 'Liverpool method') in the housing supply ring fence area but within the next five years (the 'Sedgefield method') in the rest of the district. However, even applying the 'Sedgefield method' to the district as a whole (and excluding sites 12 and 13), a 5.9 years supply exists, albeit that within the ring fence area alone only a 4.3 year supply exists. Nonetheless, I am satisfied that it is appropriate for the Council to apply the Liverpool method to calculation of supply in its "self-imposed" ring fence area and in the application of policy CP5 (also giving a supply of 5.9 years excluding sites 12 and 13), given that across the district as a whole a supply well in excess of 5 years exists when calculated on the more demanding Sedgefield method. Moreover, given that some concern has been raised about the possibility of saturation of the housing market in the South East Vale sub-area, it is questionable whether the number of dwellings required to provide a five year supply using the Sedgefield method in this sub-area could be delivered.

13.3 The plan's housing allocations in addition to existing completions and commitments and a minimal allowance of about 4% for windfalls would provide for approximately 102% of the full plan period housing requirement. Given this and that the current supply of deliverable housing land is well in excess of 5 years I consider there to be no need to allocate more sites for housing in advance of the Part 2 plan and/or Neighbourhood Plans. I recognise that the 200 dwelling threshold for the inclusion of housing allocations in the Part 1 plan is somewhat arbitrary and that, in terms of achieving projected delivery, there is a benefit in the housing supply comprising a mix of site sizes. However, in addition to 23 or so sites of 200 dwellings or more, the current supply of deliverable housing land includes more than 660 dwellings on sites of less than 10 units and over 100 sites of between 10 and 199 dwellings. I am satisfied that this provides an appropriate portfolio of site sizes and that, thus,

there is not a need for the Part 1 plan to allocate more sites for housing of either less than or more than 200 dwellings. The precise figures indicated above may vary dependent upon the Council's response to my questions about housing allocation site 6 (East Hanney). However, I am satisfied that whatever the outcome in respect of this site, there will not be a need to allocate more sites for housing in the Part 1 Plan.

14. Botley Central Area

14.1 Policy CP11, concerning Botley Central Area, was discussed at some length at the hearings and I have since had the opportunity to visit the area and look again at the submitted written evidence.

Requested response 4: in order that I can reach a view on whether or not the policy is soundly based I would be grateful to receive further comments from the Council in respect of policy CP11, having particular regard to:

- (a) The lack of any indication in the policy or its supporting text of the amount of retail floorspace which would be required at Botley Central Area to meet the objectively-assessed needs;**
- (b) The exclusion from the boundary of the Central Area, as defined in Fig 5.3 of the plan, of a bank and a church, given their inclusion within the Botley Centre SPD Site Boundary.**
- (c) The inclusion of existing residential development within the Fig 5.3-defined Central Area without a policy requirement that it is replaced, noting in particular that part (iii) of the policy does require that the library and Baptist Church also included in the defined area are replaced. Whilst the SPD is not formally before me for consideration I also note that the Sustainability Appraisal Report of the SPD scores housing provision as a significant beneficial effect when neither policy CP11 nor the SPD itself require the provision of housing as part of the scheme.**

15. Other elements of the plan

15.1 Subject to modifications along the lines of those discussed at the hearings I am satisfied that all other aspects of the plan are likely to be capable of being found to be soundly based.* I will contact the Council separately with comments on its draft proposed modifications and the alterations to them which I believe are likely to be necessary for the plan to be sound.

16. Conclusions

- 16.1 I trust this letter is helpful in setting out my interim findings on the plan and I am pleased, at this stage, to be able to conclude that, subject to modification, I am likely to be able to find that the plan is sound. However, once again I emphasise that this is not my final report on the Examination and circumstances may result in changes to these findings.
- 16.2 I would now be grateful if the Council would advise me as soon as possible of the likely timescale for a response to my highlighted requests.
- 16.3 Finally, in terms of the Community Infrastructure Levy Examination it appears to me that it would be most sensible to hold this once there is a more definitive list of the likely modifications to the plan; potentially during the period of formal consultation on them.

Yours sincerely

Malcolm Rivett

INSPECTOR

Appendix 1

Five Year Housing Land Supply Outcome assuming deletion of housing allocation sites 12 and 13 from the plan.

	Ring Fence, using 'Liverpool Method'	Rest of District, using 'Sedgefield Method'
Five Year Housing requirement for each supply area 2016- 2021	4336	2755
	Whole District	
Total Five Year Housing Requirement	7091 (4336 +2755)	
Housing Supply	10260 (10910 – 650)	
Number of Years Deliverable Supply	7.2	
Over/Under Supply	+3169	