

Reviewed Long Wittenham
Neighbourhood Development Plan
2018-2035

EVIDENCE PAPER SITE ALLOCATIONS

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Submission Draft (revised)

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Part 1: Background

Introduction and purpose of this report

1. The Long Wittenham Neighbourhood Development Plan (LWNPD) was made on 12 October 2017 following a successful referendum on 7 September 2017. The "yes" vote was 92% of those who voted or 59.9% of the whole electorate.
2. The key policy in the LWNPD is LW1 which seeks to create a new community hub that would provide a new location for the local school, a pre-school, Village Hall and community facilities including a shop, parking and sports facilities on a new site.
3. The need for this primarily results from the failings of the existing community infrastructure, specifically the Village Hall and school. The overall proposal, set out in the supporting text of the made LWNPD, is that the existing school and Village Hall sites would be sold for redevelopment and the funds would go towards a new development on an undeveloped site. The viability of the scheme would be further supported by the provision of approximately 40 new houses as part of the hub development over the three sites. Overall, it would be highly desirable for the project to be cost neutral in terms of public expenditure and would provide the most sustainable option for the current and future community.
4. The evidence in support of LW1 considered several sites and the original intention of the NDP steering group was to include a site allocation in the plan. The Local Planning Authority, South Oxfordshire District Council (SODC) was not satisfied that the methodology used by the steering group was sufficiently robust for a site allocation and the steering group was advised that as an alternative, a planning application or community right to build order (CRTBO) might be suitable. Despite the original intention to allocate a community hub site, the final version of the NDP used a criteria-led approach in LW1 with the stated intention that a CRTBO would be pursued to deliver the hub.
5. One of the sites originally considered for the potential hub allocation was land off Fieldside Track (referred to as "Site 1" in the NDP's supporting evidence). A planning application was submitted (Ref P16/S1124/O, dated 30 March 2016) for 36 houses on this site, which was adjacent to the Parish Council's preferred hub site (Site 2a).
6. The LPA did not determine the Fieldside Track application within time, and the applicant went to appeal on the grounds of non-determination.
7. A planning inquiry was held in November 2017(APP/Q3115/W/17/3169755). The Parish Council was given leave to participate in the inquiry and evidence was presented to the Inspector regarding the weight to be given to LW1 and the CRTBO. The Parish Council's evidence indicated that to allow the appeal would jeopardise the delivery of the CRTBO and thus undermine the delivery of the NDP's primary objective: the community hub. The CRTBO process had not yet been completed by that time, and no evidence was supplied to the Inspector regarding how it would be delivered.
8. The appeal was considered in the context of a housing land supply of less than 5 years. All parties at the inquiry agreed that the NDP did not allocate sites and was not eligible for the protections under the written ministerial statement of 12 December 2016. The appeal was

allowed and the Parish Council's case that the proposal would jeopardise the delivery of the CRTBO was not given weight by the Inspector. In addition, though the Parish Council sought funds towards the realisation of the hub through S106 contributions, the Inspector did not agree that sufficient evidence had been provided to give assurances that the proper tests had been met.

9. In the meantime, a private developer, Thomas Homes, had entered into a Memorandum of Understanding with the Parish Council and the landowner to deliver the hub using private finance, part of which was supported by housing on land that had been offered to the Parish Council at a very favourable price. Overall, the hub proposal appeared to be deliverable and this was discussed at the planning inquiry.
10. A significant proportion of the Parish Council's evidence at the inquiry related to the difficulties the steering group had faced in undertaking a site allocation for a hub and housing development. The NDP had not met the objective of ensuring that new development in Long Wittenham contributed to the village's overall sustainability by contributing to the hub project.
11. LW1 had failed to achieve the Parish Council's and local community's aspirations in that the appeal proposal would add additional houses to the village that would be required in addition to those needed to enable the hub proposal to proceed (i.e. there would be new houses but no new infrastructure to meet their needs). Overall, the Parish Council doubted that the CRTBO approach would be supported by the local community following the appeal, and in any event, the resources available to the PC were limited for such a large project. The Parish Council decided against using a CRTBO in favour of a site allocation.
12. The Parish Council was confident that aspects of the hub proposal could be delivered by its private sector partner but wished to have the certainty that a site allocation could limit other housing coming forward. In addition, it wished to secure the future of the school and wished to have the security afforded by the Ministerial Statement (December 2016). This has now been overtaken by changes to the NPPF 2021, paragraph 14.
13. The Parish Council therefore resolved (18 January 2018 - minutes) to immediately review the NDP while the evidence was still up to date, and to revert to the original approach of allocating a site or sites to deliver the community hub.
14. Andrea Pellegram Ltd. supported the Parish Council in the planning inquiry and because of her familiarity with the circumstances surrounding the preparation of the LWNPD and its testing at a planning inquiry, was commissioned to undertake a site assessment and review of the NDP.
15. This report reviews the circumstances surrounding the original attempt to allocate sites in the LWNPD and proposed as revised methodology based on the Locality *Site Assessment for Neighbourhood Plans: a toolkit for neighbourhood planners*".
16. The report is set out as follows:

Part 1: Background to the hub proposal and the current policy LW1

Part 2: Methodology for the site assessment

Part 3: Site assessments for community hub and housing development

Part 4: Site allocations under Local Plan policy H8

17. This Evidence Paper should be read in conjunction with the Strategic Environmental Assessment Environmental Report that accompanies the RLWNDP. That report considers further options to those presented here and is a relevant component of the decision-making regarding the final site allocation policies in the neighbourhood plan.

The Community Hub proposal

18. The community hub proposal has been in public consideration since it was first discussed in the *Wittenham Vision* in 2010. Since that time, there have been many discussions, as part of the NDP but also by the Parish Council and the community at large, about how the community hub project could be realised.
19. The Parish Council is the democratically elected body that is acting as overall sponsor for the community hub project and which undertakes negotiations on its behalf.
20. Agreement has been secured either in Memoranda of Understanding, verbal agreements and Parish Council activities. **Appendix 1** is a letter from the County Council setting out its position regarding the school site and the proposed new school. An option agreement has been signed between the landowner and the developer. There is a separate agreement, not yet signed, between the developer and the Parish Council.
21. The outline proposal for the community hub project is as follows and relates to three sites at present:
 - **Didcot Road:** this is the main hub proposal site. It compares favourably against all other known sites. This land is privately owned. In the made LWNDP, this is referred to as "Site 2a".
 - **The school site:** this site would be subject to a "land swap" as enabling development. This land is jointly owned by Oxfordshire County Council (OCC) and the Oxford Diocese.
 - **The Village Hall site:** this land would be redeveloped as 1-2 houses by the Parish Council and the funds used towards the costs of a new Village Hall within the hub scheme on the Didcot Road site. This land is owned by the Parish Council.
22. The proposal seeks to balance the need for economic return with the need to improve the village's overall sustainability by allowing sufficient housing to be built to cross-subsidise the community infrastructure. Transport issues will be addressed as congestion caused by school drop off and collection is moved from the High Street to improved parking and access at the hub site. A quantum of around 40-45 open market housing and affordable housing, is proposed to be built as a commercial activity to cross-subsidise the development of the school, car parking, playing fields, Village Hall etc. at no cost to the public purse.
23. The plan to relocate the school and village hall pre-dates the development of the 2017 made LWNDP. It was first suggested in the village plan, *Wittenham Vision*. The proposal was slow to

be agreed because it was difficult to find a way to provide the development without funding from any Local Authority partners. It would have been impossible to build the community buildings on land purchased at market rates without building well in excess of 100 houses. The village as a whole resisted new housing on this scale and for this reason, progress on the scheme slowed.

24. During the process of developing the made LWNPD, a local land owner offered to sell land to the project to the Parish Council or for its purposes at CIL rates (i.e. the rate per hectare as determined by South Oxfordshire District Council for this type of project). This made the project viable with a reduced number of new market rate and affordable houses needed to cross-subsidise the non-housing activities from 100 to the 2017 estimate of 35-40. This was acceptable to the village and this proposal was put forward in the 2017 LWNPD Policy LW1.
25. The Parish Council, working with the landowner, identified a development partner to take the project forward. These three bodies have worked closely together to plan the project, also taking advice from the planning authority. However, the project is complicated due to the number of parties involved (Parish Council, landowner, developer, OCC and Oxford Diocese as the owners of the school site).
26. Legal agreements have now been drawn up between the parties. The development partner has an option to purchase the land once planning permission has been received. The agreement only allows housing development in conjunction with the hub development. If the proposed school closes in the future there will be a covenant that prevents OCC/Oxford Diocese selling the land for housing.
27. The final piece of the jigsaw was achieved at the end of August 2018 when the Diocese and OCC agreed to move the school to the proposed new site, pay for relevant legal fees, furnish the new school and release the current school land to the developer for housing.
28. During the course of the discussions the project evolved in a number of ways:
 - a. OCC as the landowner and education authority requested that the school should have a playing field appropriate for a one form entry school, though the school building will be half form entry. This provision will "future proof" any school expansion should this be required. However, this resulted in the need to include a larger land parcel than originally envisaged.
 - b. The developer agreed that the Parish Council should keep the current Village Hall site, so that it could provide an income that would offset any future costs from the new Village Hall.
29. The developer's original estimate for the number of houses to cross fund the school and village hall was 35-40. Detailed viability calculations have only been undertaken since August 2018 when the developer was reassured by the Parish Council that the project could proceed. These calculations plus the additional costs to the developer listed above have resulted in the project now requiring around 45 houses to cross fund the new community facilities.

30. The project plan in outline will involve which is the basis for the policies and approach in the Reviewed Long Wittenham NDP (RLWNDP):
 - a. Planning application in line with LWNDP LW1;
 - b. Purchase of Didcot Road (RLWNDP LW1) by the development partner on receipt of planning permission;
 - c. The development partner will use its own funds to built 45 houses, school and village hall and associated playing fields and amenity areas in stages as sketched out above and set out in LW1;
 - d. On completion of the hub development, ownership of the newly constructed school building and land will be given to OCC/Oxford Diocese and in return, the development partner will take ownership of the current school buildings and land site referred to in LWNDP LW2;
 - e. On completion of the hub project in RLWNDP LW1, the ownership of the portion of the new development containing the new Village Hall, its parking and the green space will be transferred to the Parish Council;
 - f. Finally, the northern part of the current school site will be developed for 5 houses as set out in RLWNDP LW2. At this time, ownership of the southern portion of the former school site including the War Memorial, will be given to the Parish Council to develop as a village green. This part of the project is set out under RLWNDP Policy LW2.
 - g. RLWNDP LW2 allows the Parish Council to redevelop the redundant Village Hall site for housing. The future plans for this site have not been considered at the time of preparing evidence for the RLWNDP.
 31. The viability assessment will not be included in the evidence in support of the NDP at the request of the developer who considers it to be commercially sensitive. The viability assessment can however be made available to the planning authority and NDP Examiner upon request.
 32. Since the overall purpose of the hub is to make the village more sustainable, so that villagers will have more convenient access to necessary services on foot or near their homes, it has always been discussed within the village that the hub and the housing would be located on the same site. This has been assumed in all public consultation since the 2010 vision and it can be considered that the principle that there is a community preference for the hub and the housing to be co-located has been established.
- ### Planning Obligations and CIL
33. Many of these agreements will be managed as unilateral undertakings and as part of the scheme's business plan and will therefore fall outside of planning control. However, it is conceivable that aspects of this multi-site and multi-phase development would be controlled by developer contributions and planning obligations.
 34. The response to the 2018 Regulation 14 draft of the NDP, the County Council notes that the County expects CIL will be reviewed and until such time as this exercise has been completed,

there is a question on how a developer could be required to pay towards a school through any Section 106 agreement. However, the NDP is being prepared under the existing CIL framework and cannot anticipate future changes to it. The Parish Council is committed to delivering the school with its chosen development partner and will engage proactively with the County and District Councils regarding necessary developer contributions.

Background to the abandoned site allocation exercise (2016)

35. The neighbourhood plan steering group, a sub-committee of the Parish Council with two Parish Council members, is composed of volunteers who progressed the work originally set out in the Wittenham Vision.
36. On 19 May 2011, following development of a village plan, "Wittenham Vision", volunteers launched their first attempt to provide a village hub in Long Wittenham. The work started in 2010. Their aim was:

...to create a sustainable community hub in Long Wittenham that incorporates a Village Hall, primary school and other facilities that will benefit our village today and in the future.¹
37. The NDP commenced in 2014 and the NDP steering group took professional advice from several sources such as:
 - Locality and AECOM
 - Savills Estates and Property Consultants
 - SODC Planning Policy and Development Management Officers and Oxfordshire County Council
 - Community First Oxfordshire (formerly known as Oxfordshire Rural Community Council)
 - David Potter from DPAS Consulting
 - Andrea Pellegram from Andrea Pellegram Ltd.
37. The aims of the Neighbourhood Plan have been consistent and largely reflect the original 2010 "Wittenham Vision"². Central to that has been the desire to create the community hub.
38. The key policy in the NDP is LW1 is that the existing school and Village Hall sites would be sold for redevelopment and the funds would go towards a new development on an undeveloped site. The financial underpinnings of the scheme would be further supported by the provision of

¹ The village website link is found here: <http://www.longwittenham.com/neighbourhood-plan/village-hallproposals/>

² The Long Wittenham website illustrates the progression from the Vision to the NDP:
<http://www.longwittenham.com/neighbourhood-plan/>

approximately 40 new houses as part of the overall hub development. This has now been revised to 45 houses in order to enable the entire scheme to be viable.

39. The steering group worked with the landowners in the village plus other stakeholders such as the local school, community at large and represented the interests of the Parish Council.
40. At a very early stage the steering group gained approval in principle to their proposals from Oxfordshire County Council and the Diocese who are joint owners of the current school site.
41. The steering group volunteers felt that they had found a balance between SODC planning policy, the needs of the local primary school, the needs of the village and had agreed to accept additional housing in their village. They also found a landowner who was willing to sell them land at significantly below-market value to enable them to proceed with their vision.
42. Savills was commissioned by the Parish Council to consider the viability of the hub model. The Savills report concluded that local development companies would be very interested in working with the identified landowners and the Parish Council to progress the overall scheme which appeared to be commercially viable.
43. Savills recommended to the Parish Council that they should enter into an agreement with a private sector partner to progress a planning application (or planning applications) in December 2014.
44. In early 2015, the steering group undertook a survey of the entire Long Wittenham community with the help of Community First Oxfordshire (ORRC) which showed that for site 1 (the appeal site) there was 72% support for a community hub, and 74% at the adjacent site (site 2a) if site 1 was not available³. The majority of the respondents agreed that enabling housing of 30-40 units would be acceptable to cross-subsidise the community hub⁵.
45. An options assessment of the available sites for the hub was undertaken in April 2016. A pre-submission draft was finalised on 6 July 2016 and submitted to SODC for comment. This contained a site assessment. These documents will be discussed in further detail below.
46. The July 2016 pre-submission draft NDP allocated the site adjacent to the appeal (site 2a) as the location of the hub and made provision for an indefinite number of homes as enabling development, according to the advice received from Savills. The relevant draft policy is reproduced below. The draft NDP adopted site 2a after extensive negotiations with the landowners of sites 1 and 2a had failed to produce a solution incorporating Site 1 which is not big enough to accommodate the hub alone. **Figure 1** shows the original policy which was abandoned.

³ Neighbourhood Plan Survey Report, ORCC, July 2015, Part ⁵ Ibid, page 11.

Figure 1: Original LW1 policy (abandoned)**Policy LW1 Community hub and housing****Policy LW1 – Community hub and housing**

Land is allocated for housing of a suitable number to meet locally identified needs and enable a community hub to be funded on the site identified on the proposals map as Site 2a. The number of homes will be subject to a viability assessment.

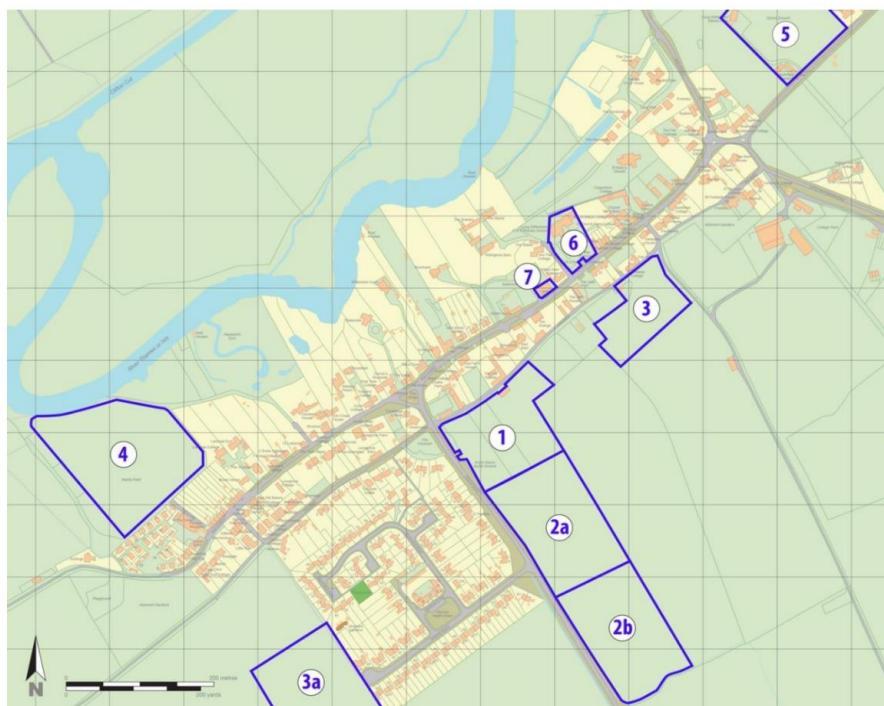
Within site 2a provision will be made for a community hub which will comprise a new primary school with adjoining pre-school, village hall, meeting and community facilities (e.g. café, community shop), parking and an all-weather sports ground or as otherwise set out in an agreed indicative masterplan.

Figure 3.2 Site 2a (Policy LW1)

47. The accompanying site assessment considered several site options for the hub. The draft NDP map is reproduced below in **Figure 2** for reference. Note that Site 2a is located within the current hub proposed allocation, Didcot Road.

Figure 2: original sites under consideration in July 2016 version of LW NDP.

Potential sites



Notes about the sites:

- Site 1 vacant agricultural land at the corner of Fieldside and the Didcot Road
- Site 2a vacant agricultural land off the Didcot Road, within the village curtilage
- Site 2b vacant agricultural land off the Didcot Road, outside the village curtilage
- Site 3 vacant agricultural land off Fieldside
- Site 3a vacant agricultural land off Saxons Heath
- Site 4 vacant agricultural land by the Thames
- Site 5 current sports ground (the sports facilities would need to be relocated)
- Site 6 existing school
- Site 7 existing village hall

48. The supporting text for draft NDP policy LW1 states:

The only justification for bringing forward a site at this time is to improve the overall quality of life in the village through enhanced community infrastructure. Development for its own sake is not sustainable and could undermine the Local Plan strategy of focusing development in Didcot and the larger villages⁴.

49. The site assessment used several criteria to consider the range of available sites in the village using a methodology provided to them by Community First Oxfordshire. The NDP group

⁴ paragraph 3.2, July 2016 draft NDP.

advertised for sites across the Parish to be brought forward. At that time, it was believed that this methodology was sufficiently robust to identify a community hub site.

50. A Regulation 14 consultation draft was submitted to the planning authority in July 2014 containing the site allocation described above. This was accompanied by site assessments and relied on the My Community site assessment toolkit.
51. When the planning authority raised concerns about the approach used in their letter dated 1 September 2016, they queried the intention to allocate site 2a:

the community hub, appears to be the main factor used to assess the sites, rather than considerations of suitability (capacity, availability, viability and impact). There is the potential for the NDP to identify other sites that are suitable for housing (or small-scale employment), even though they may not deliver the community hub. For example, Site 1 scores well in your site assessment apart from being too small to deliver the community aspirations (other considerations such as road safety and conservation area impacts could be dealt with through a planning application, and SODC conservation officers would be unlikely to rule out development on this site because of potential impact on the conservation area). We suggest you provide a justification of the site selection criteria used and limit the factors to the plan objectives and not the specific policies.

Additionally, the sites assessed were only those known to the steering group (SA page 30). We strongly suggest that added justification for this approach is stated in the plan, or appendix, to avoid the potential for challenge to the site selection process.

52. The NDP steering group found aspects of this advice confusing because the purpose of the allocation was for a community hub and not housing per se. However, other aspects of the response are valid considerations and will be taken into account in the methodology presented in this report.
53. The steering group then made the decision to abandon the site allocation approach in favour of a CRTBO for the hub site. AECOM were commissioned to prepare a Supplementary Site Assessment in furtherance of the CRTBO. This document considered the same sites as the site assessment. That report concluded that "the group has been advised by SODC that none of the sites identified would be in compliance with national or local planning policy". This was not strictly correct – they were advised that their methodology was flawed and the compliance with policy had not been proven.
54. AECOM suggested that should the NDP allocate a site or sites, it would need to demonstrate that the allocation(s) were: suitable, available and achievable⁵
55. The AECOM report considered the sites on a "policy off" basis since, on principle, none of the sites were required by the Local Plan to be allocated (see policy discussion below). The AECOM assessment considered practical and high-level issues only and did not consider individual

⁵ AECOM, December 2016, *Supplementary Site Assessment*, section 3.1.

planning policies. The Steering Group assumed that the final selection would be tested in the CRBTO process.

56. AECOM concluded that "only site 2a could currently deliver the community hub due to its size and the landowners willingness to develop the site for the proposed use."⁶

⁶ Ibid.,3.4.9.

Part 2: Methodology

Objective of the site allocation process

57. This part of the report sets out the methodology that will be used to update and refresh the previous site allocation work.
58. The evidence for the previous site allocation was dated 2016 and is therefore still current. Since that time, SODC has produced a SHELAA which has returned two potential sites for consideration (see below) and has adopted the Local Plan.
59. Local plan policy **H8 Housing in Smaller Villages** expects that small villages with an NDP will expand housing stock by 5% to 10% over the course of the plan to 2035. In Long Wittenham, this figure is around 5-15 dwellings. The appeal allowed an additional 36 dwellings. Therefore, the RLWNDP is not required to identify any further open market housing sites to meet the requirements of this policy.
60. However, to realise the hub proposals, the made LWNDP sets out that an additional 35-40 houses will be provided as part of the hub scheme. This has now been revised upwards to 40-45 houses. This will include an affordable housing element in line with local plan policies. In addition, the made LWNDP indicates that the redevelopment of the school site will yield approximately 5 dwellings⁷ and the redevelopment of the Village Hall another 1-2 dwellings. Therefore, the LWNDP can be interpreted to anticipate that planning applications affecting the hub and the necessary reconfiguring of the village will yield up to 52 new dwellings in total from the three sites.
61. The RLWNDP policies must provide a secure context for these multi-site considerations to proceed in order to safeguard all necessary land and ensure that the overall reconfiguration of village services constitutes sustainable development. This means that the Village Hall and school sites will be required to make a contribution to the delivery of the hub on its site and that the overall financial balance is supported by the provision of market rate housing alongside affordable housing.
62. It is not possible in the site assessment or in the NDP to assess the overall viability of the hub proposals due to their complexity. However, it will be possible to ensure that the principle of the proposals is acceptable in planning terms. The viability of any scheme will ultimately be tested at the business development and planning application stage where much of the component viability considerations will be commercially sensitive.
63. The site assessment will provide evidence for a refreshed suite of NDP policies in furtherance of the community hub aspirations. It is intended to achieve the following:

⁷ This is a large site, but portions are earmarked for a village green and war memorial, so the housing element has been limited to 5 new homes.

- Redrafting and refinement of the criteria-based approach in LW1;
- Site allocation for a community hub scheme with open market and affordable housing;
- Site safeguarding allocations for other sites that are required to enable the hub scheme to proceed;
- Allocation of land for sites that have been granted planning permission since 2011 in line with emerging local plan policy H8.

Local Plan policy context for site allocations

64. A full review of the planning context for the entire reviewed LWNPD is found in the **Evidence Paper: Planning Policy Context**. The discussion in this document relates to the need to allocate housing land in Long Wittenham.
65. The South Oxfordshire Local Plan 2035 (the Local Plan) Policy STRAT1 has not made a strategic housing allocation in Long Wittenham which is designated as a "smaller village". The Local Plan settlement background paper "Preferred Options" (June 2016) identifies Long Wittenham as a "smaller village" because it scored poorly on sustainability criteria and the availability of facilities and services. This was carried forward in Table 1, page 5, Local Plan Background Paper Settlement Assessment 2018.
66. Local Plan Policy H1, 3, vi states that in areas where there is no strategic allocation, housing development will only be permitted where there are other specific exceptions/circumstances defined in a Neighbourhood Development Plan
67. Local Plan policy H8 again sets out the role of NDPs in allocating housing land. Neighbourhood Development Plans will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village in the 2011 census (minus any completions since 1 April 2011). The quantum for Long Wittenham is estimated to be 15 houses over the made LWNPD plan period as set out in the NDP which has not allocated sites.
68. The 2017 planning appeal allowed 36 dwellings which exceeds the requirement set out in H8 by some margin.

Development management policies for the community hub allocation

69. Development management policies in the Local Plan and LWNDP provide a policy context for the suitability of individual sites. Development management policies to be considered in the site assessment are:

Housing mix and affordable housing	<ul style="list-style-type: none"> • Local Plan policy H9 • SHMA 2014 • LWNDP LW3
Community infrastructure	<ul style="list-style-type: none"> • Local Plan policy INF, CF1, CF2. • LWNDP LW1, LW2
Heritage and Design	<ul style="list-style-type: none"> • Local Plan ENV1, ENV6, ENV7, ENV8, ENV9, DES2, H16 • South Oxfordshire Design Guide • LWNDP LW1, LW3, LW4
Transport	<ul style="list-style-type: none"> • Local Plan policies TRANS2, TRANS5 • LWNDP policy LW6, LW6
Ecology and biodiversity	<ul style="list-style-type: none"> • Local Plan policies ENV2,ENV3 • LWNDP LW7
Public Open Space	<ul style="list-style-type: none"> • Local Plan ENV5

Minerals and Waste	• Local Plan EP5
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SHELAA

72. The South Oxfordshire District Council *Strategic Housing and Economic Land Availability Assessment* (SHELAA) was published in October 2017. It is the most up to date source of information on site availability in Long Wittenham. The SHELAA sites are identified on Sheets 28 and 33 of the HELAA (Housing and Employment Land Availability Assessment), October 2017.
73. The SHELAA identified the following sites in Long Wittenham parish:

SHELAA	Site Name	Suitable	Available	Achievable	Housing
72	Land adjoining High Street	Yes	Yes	Yes	Yes
925	Land east of Didcot Road	Yes	Yes	Yes	Yes
1014	Willington Down Farm	No	No	No	No
1052	Land north of Pearith Farm	No	Yes	No	No

74. The only sites that the SHELAA identified that would be suitable for the community hub with enabling housing would be sites 72 and site 925. These are shown in **Figure 3**.

Figure 3: Sites deemed potentially suitable for housing development in the SHELAAs



Site assessment objectives

75. LWNDP policy LW1 Community Hub will provide significant new and refreshed public infrastructure for the village, making it a more sustainable settlement.
76. However, public bodies such as the education authority and the Parish Council lack the funds to realise the community vision. This project should ideally be self-funding. New market housing could provide funds to cross-subsidise the scheme and it would be helpful if land value was significantly reduced to enable the overall project to be financially viable.
77. The hub scheme has several components that should be delivered:

- A new community hub will be built that will contain: a new primary school; pre-school; Village Hall; sports and community spaces; café; playing field; pick up points for children/parents with suitable parking arrangements. It is estimated that the minimum plot size for these land uses is approximately 1-1.5 hectare.
 - New housing co-located with the hub in the order of 40-45 houses on a site estimated to be approximately 1 hectare.
 - There is a community preference that the new housing and the hub be located on the same site or adjacent, though if this is not possible, the two activities may be developed on separate sites.
 - The existing primary school land will be “swapped” in ownership for land on the hub site. The school site will be redeveloped as a housing site for approximately 5 dwellings with a village green and enhanced war memorial.
 - The Village Hall, owned by the Parish Council, will be redeveloped as 2 dwellings.
78. The objective of this site assessment is to ensure that sufficient suitable land is available to deliver all the components of the community hub scheme.

Assessment criteria

79. The My Community toolkit recommends that a NDP site assessment should determine whether a site is deliverable in terms of its suitability, availability, viability and achievability⁸. The My Community advice can be refined to meet the needs of the LWNPD community hub allocation as follows:

Suitable

- Is there sufficient land for:
 - a. 1 ha for housing?
 - b. 1.5 ha for the community hub?
 - c. 2.5 ha for both activities to be co-located on the same site?
- Are there any national or local designations that would preclude development of the site for the hub or for enabling housing?
- Is the site generally suitable in terms of the local development considerations and the LWNPD in the following policy aspects?

⁸ My Community, 2015, Site Assessment for Neighbourhood Plans: a toolkit for neighbourhood planners, pages 11-14.

- No loss of important open space, views, or impacts on privacy;
- Within 0.5 km of the village centre to facilitate walking and cycling (using junction of High Street and Didcot Road as the centre);
- Suitable school car parking and circulation with safe highway access;
- No parking on main roads required in the final development;
- No negative impacts on local views as described in LWNPD LW4 (RLWNP LW8);
- No negative impact upon the historic environment (including archaeology), listed buildings and conservation area;
- No negative impacts on ecologically sensitive areas as described in LWDNP LW6 (RLWNP LW7).
- Is the site capable of being in general conformity with the development plan as a whole?

Available

- Is the landowner willing to make the site available for the Parish Council to secure a village hub in the short term

Achievable

- Is the overall scheme able to realise the aspirations of policy LW1?

Safeguarding enabling land

80. The school site and the Village Hall site are required to realise the overall hub scheme as set out above.
81. There are a number of options that the RLWNP policy could use to secure the future role of these sites in the overall hub scheme:
 - a. Make no special provisions and rely upon the intentions of the landowners to deliver the sites in the overall hub scheme;
 - b. Allocate the sites for the purpose of housing so that they make a contribution to local housing supply and provide subsidy for the overall scheme;
 - c. Safeguard the sites so that they are available for redevelopment as housing sites but, should the hub scheme fail and they are not required, the landowners retain some flexibility as to how they are used in future should they become redundant or no longer required.

Option a) No special policy protection

82. If the school and Village Hall sites were not covered under RLWNDP policy, their role in the overall hub project would be uncertain. The delivery of the hub requires that all sites come into play as described above. Should no policy provisions be made in the NDP, it is possible that one or both of the sites would "fall out" and that they would not be available or able to provide the necessary support for the overall scheme. This is not deemed to be a suitable approach and it will not be adopted.

Option b) Allocate the sites for housing

83. The hub proposal envisages that the Village Hall and school sites will be developed for housing in order to provide overall subsidy for the scheme.
84. If the sites were allocated for housing and the hub scheme did not proceed, then the land at either site might become available at a future date depending on the needs of the school or the Parish Council.
85. The NDP has set out the case that Long Wittenham has made excess provision for housing over the plan period through past planning permissions and site allocations. Therefore, it might be possible that the best use of the school or Village Hall sites in the future might not be for housing but an alternative use.
86. In the event that the hub scheme fails, there is no reason why the Village Hall and school sites can ONLY be redeveloped for housing. It might be that in future, other land uses will be required on these sites. For instance if the school were to close for any reason, it might be that a new recreational facility would be needed on the site since there is no community hub. Likewise, it might be that the Village Hall may become redundant for that particular use but it might be attractive to a shop keeper or café owner and the case could be made that a central village location would be suitable for these activities.
87. If the sites were allocated as housing sites, the landowners would not have the flexibility to change the use of the land to anything other than housing. This lack of flexibility, where no need for additional housing has been proven, is not the optimal policy approach.

Option c) Safeguard the sites for housing

88. Land has been safeguarded elsewhere in Long Wittenham in the Parish Plan. The new Thames road crossing between Culham and Didcot Garden Town has been safeguarded (as explained in the Evidence Paper: Countryside). The purpose of this safeguarding is to prevent change of use or development on the necessary land until such time as is may be required. If it is not required, i.e. the proposed crossing does not proceed for any reason, then the use of the land will again be under the control of the landowner.
89. The most viable and effective use of the Village Hall and school sites at the time that the hub proposal is being prepared is for housing. Therefore, for this review of the NDP, it is proposed that those sites will become redundant when the new facilities at the hub are built and that those sites will be put to best use which is housing.

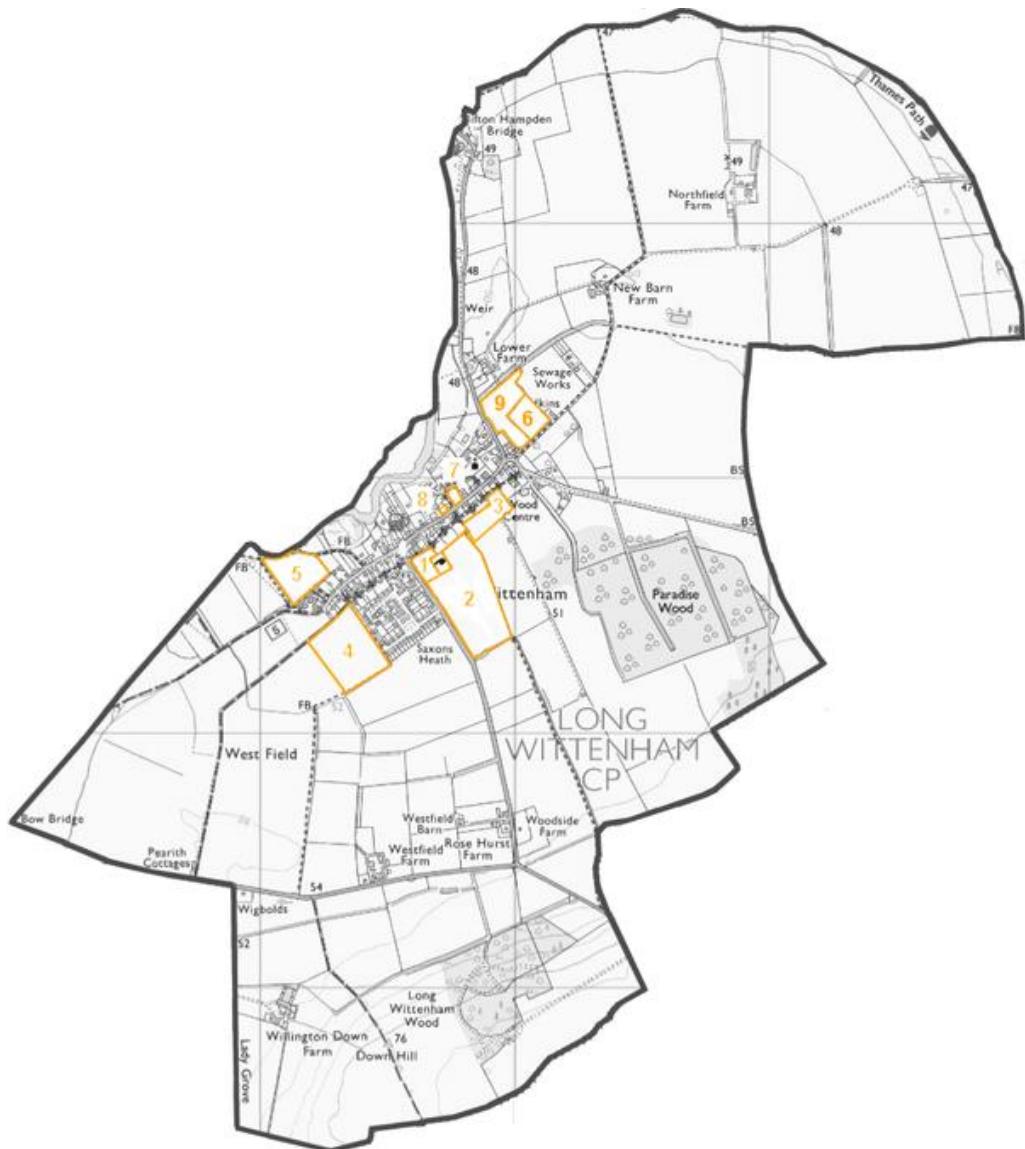
90. Since sufficient provision has been made in excess of Local Plan policy H8, it is not necessary to specify the development of the Village Hall or school sites for housing unless this makes a contribution to the hub scheme. If the Village Hall and school sites are not required to make such a contribution, then it is possible that a non-housing land use would be a more effective use of the land. This would need to be proven in individual planning applications.
91. The safeguarding approach is superior to the site allocation approach for the reasons set out above: safeguarding will be more flexible in the event that the community hub scheme fails than an allocation for housing which is not proven to be necessary.
92. The Village Hall and schools sites will be safeguarded in the LWNPD for the purpose of delivering the community hub. A separate allocation will be made in the reviewed LWNPD for these sites that will set out that should they become available for housing, they will be developed as follows:
 - Village Hall: 1-2 dwellings.
 - School: 5 dwellings with village green and enhanced war memorial.

Part 3: Site Assessments for community hub and housing development

93. The initial NDP considered 9 sites. The SHELAA considered 3 sites adjacent to the village, two of which were originally considered in the NDP, and one that has not. Overall, there are now 9 sites that require assessment.
94. The table below reviews the available sites for the community hub and housing development using the criteria set out above. The sites are shown on **Figure 4**.
95. The sites have been assessed using a simple traffic light system:
 - Green – meets the basic requirements;
 - Amber – does not fully meet the requirements but the use of developer contribution, planning conditions or other considerations could provide sufficient mitigation to overcome concerns OR the site was not considered for the criterion;
 - Red – does not and cannot comply with basic requirements.

Map number	1	2	3	4	5	6	7	8	9
Name of site	Fieldside	Didcot Road	Land off unmade road to east of village	West Field / Saxons Heath	Wards Field	Bodkins Playing Field	Primary School	Village Hall	Land off High Street / east of village
Site ref in original NDP	1	2a/2b	3	3a	4	5	6	7	
SHLEAA ref		925		1052	1052				72
SHLEAA conclusion on acceptability of housing									
1 HA available for housing development									
1.5 HA available for community hub									
2.5 HA for both housing and hub on same site									
Are there any national or local designations that would preclude development of the site for the hub or for enabling housing?									
No loss of important open space, views, or impacts on privacy									
Within 0.5 km of the town centre to facilitate walking and cycling (using junction of High Street and Didcot Road as the centre)									
Suitable for a car park for the school with potential safe highway access									
No parking on main roads									
No negative impacts on local views as described in LWNDP LW4									
No negative impact upon historic environment (excluding archaeology), listed buildings and conservation area									
No negative impacts on ecological sensitive areas as described in LWNDP LW4									
Is the landowner willing to make the site available for the parish council to secure a village hub in the short term (before 2020)?									
Minerals safeguarding area									
Total number of "green"	7	12	7	7	5	7	8	8	7
Total number of "red"	3	0	5	7	7	4	3	3	3

Figure 4: Sites assessed for community hub site allocation



96. In summary, the following can be concluded for each site:

Fieldside (1): this site has received planning permission for 36 houses and is no longer available.

Didcot Road (2): This site is the optimal site with the most "green" benefits and fewest "red" constraints. The site is large enough to accommodate the hub and housing on the same site and the land is currently available at a favourable land value. The north east corner may impact upon the view corridor from the village to Wittenham Clumps and this will require careful design to avoid harm. Historic England raised concerns during the 2018 consultations (Regulations 14 and 16) and subsequently scheduled part of the original site. The proposed scheme has been reconfigured to account for the scheduling and a full archaeological assessment has been undertaken and is available in the RLWNPD evidence⁹. On this basis, the proposal can be modified to mitigate against any harm that might be otherwise caused and the historic finds are of lower significance than originally anticipated. Whereas it had been presumed that there had been an Anglo Saxon hall on the site, this has now been reassessed as being an animal stockade.

Land off unmade road to east of village (3): This site was not put forward for consideration for the SHELAAs. It does not have direct access to the main highway network and is currently only accessible via an unmade road. It is not large enough to accommodate both the housing and the hub on the same site. It is an identified habitat for Roman snails.

West Field / Saxons Heath (4): This site was deemed as unsuitable for housing in the SHELAAs and is not ideal for the hub proposal since it is at the edge of the village.

Wards Field (5): This site was deemed as unsuitable for housing in the SHELAAs and is not ideal for the hub proposal since it is at the edge of the village. In addition, there is a covenant preventing development.

Bodkins Playing Field (6): This site is outside the built-up area of the village and very most distant from the centre. It is also used as a playing field and should remain in that use. It is therefore not a favourable site for either housing or the hub.

Primary School (7): This site is currently deemed unsuitable as a school site since the "centre" of the village has moved eastward, hence the proposal to move it to a new hub site. The site is too small to accommodate 40-45 houses.

Village Hall (8): This site is very constrained and is not suitable for either the housing or hub elements of the proposal.

Land off High Street / east of village (9): This site has been proposed for 29 houses in a recent planning application but the owner has clarified that it is not available for the community hub. It is not large enough to accommodate both the hub and the housing on the same site due to flooding constraints. The planning application was withdrawn, there were concerns raised by the

⁹ Land off Didcot Road Long Wittenham Oxfordshire-Archaeological Evaluation, Cotswold Archaeology, May 2021.

community and it is therefore questionable whether the site is sufficient for the purposes of a community hub with 40-45 houses.

Preferred community hub site

97. Didcot Road is superior in terms of its "suitability" according the criteria set out above, taking account of the site's archaeological significance. It has more favourable characteristics and fewer unfavourable characteristics than any of the other sites and overall, is the most likely to meet community aspirations.
98. The Environmental Report accompanying the RLWNDP undertakes an options appraisal and concludes that the Didcot Road site is the preferable site.
99. **Evidence Paper: Planning Policy Context** has assessed the Didcot Road site against Development Plan policies. That assessment concluded that it is capable of meeting the requirements of the development plan and that there are no insuperable planning reasons why the allocation and proposal should not proceed.
100. Two responses were received in the Regulation 14 consultation that are relevant to the allocation.
101. The County Council pointed out that Footpath and 287/5 crosses the proposal site and connects the site to the centre of the village. In addition there is a private Right of Access through the 'Land off Fieldside' site, more convenient than Footpath 5
102. English Heritage objected to the site allocation which has been addressed as explained above.
103. Didcot Road is therefore suitable to be allocated for the community hub development in the reviewed LWNDP.
104. Should the community hub scheme fail, the allocated site will not be required by definition. The allocation is for a hub and housing and the case has been made that the housing is allocated as necessary to deliver the hub. Therefore, should the hub scheme fail, there is no need for housing on the site. The delivery of housing on the hub site would be in excess of the identified requirement of 5% over the 2011 baseline.
105. Therefore, should the hub scheme fail, the allocated Didcot Road site would not be developed and the preparation of a revised Community Hub scheme would be dealt with in the review of the LWNDP.
106. The Parish Council's preferred development partner has prepared an indicative masterplan. This has not been submitted as part of a planning application and therefore has no planning status. It has been discussed with Historic England in a pre-application discussion. This is provided in full in the archaeology evidence paper and is also discussed in the SEA Environmental Report.

Suitability of safeguarded sites

107. **Evidence Paper: Planning Policy Context** has assessed the Village Hall and school sites to determine whether it is acceptable in broad planning policy terms for them to be redeveloped for housing and other land uses as suggested in the LWNDP.

108. That assessment concluded that both sites are capable of meeting the requirements of the development plan and that there are no insuperable planning reasons why the allocations and proposals should not proceed.
109. A similar approach to site assessment has been undertaken with regard to the safeguarded sites, set out below.

Map number	1	2	3	4	5	6	7	8	9
Name of site	Fieldside	Didcot Road	Land off unmade road to east of village	West Field / Saxons Heath	Wards Field	Bodkins Playing Field	Primary School	Village Hall	Land off High Street / east of village
Site ref in original NDP	1	2a/2b	3	3a	4	5	6	7	
SHLEAA ref		925		1052	1052				72
SHLEAA conclusion on acceptability of housing									
1 HA available for housing development									
1.5 HA available for community hub									
2.5 HA for both housing and hub on same site									
Are there any national or local designations that would preclude development of the site for the hub or for enabling housing? No loss of important open space, views, or impacts on privacy Within 0.5 km of the town centre to facilitate walking and cycling (using junction of High Street and Didcot Road as the centre)									
Suitable for a car park for the school with potential safe highway access									
No parking on main roads									
No negative impacts on local views as described in LWNPD LW4									
No negative impact upon historic environment (excluding archaeology), listed buildings and conservation area									
No negative impacts on ecological sensitive areas as described in LWDNP LW4									
Is the landowner willing to make the site available for the parish council to secure a village hub in the short term (before 2020)?									
Total number of "green"	7	12	6	7	5	7	7	7	7
Total number of "red"	3	0	5	7	7	4	3	3	3

110. The review of the safeguarded sites for housing in relation to other sites available for housing (which exclude the community hub site and the Fieldside site which is subject to allocation in

another part of this document) indicates that of all the other sites under consideration, the school and Village Hall sites score most favourably, both having the most "greens" and no "reds".

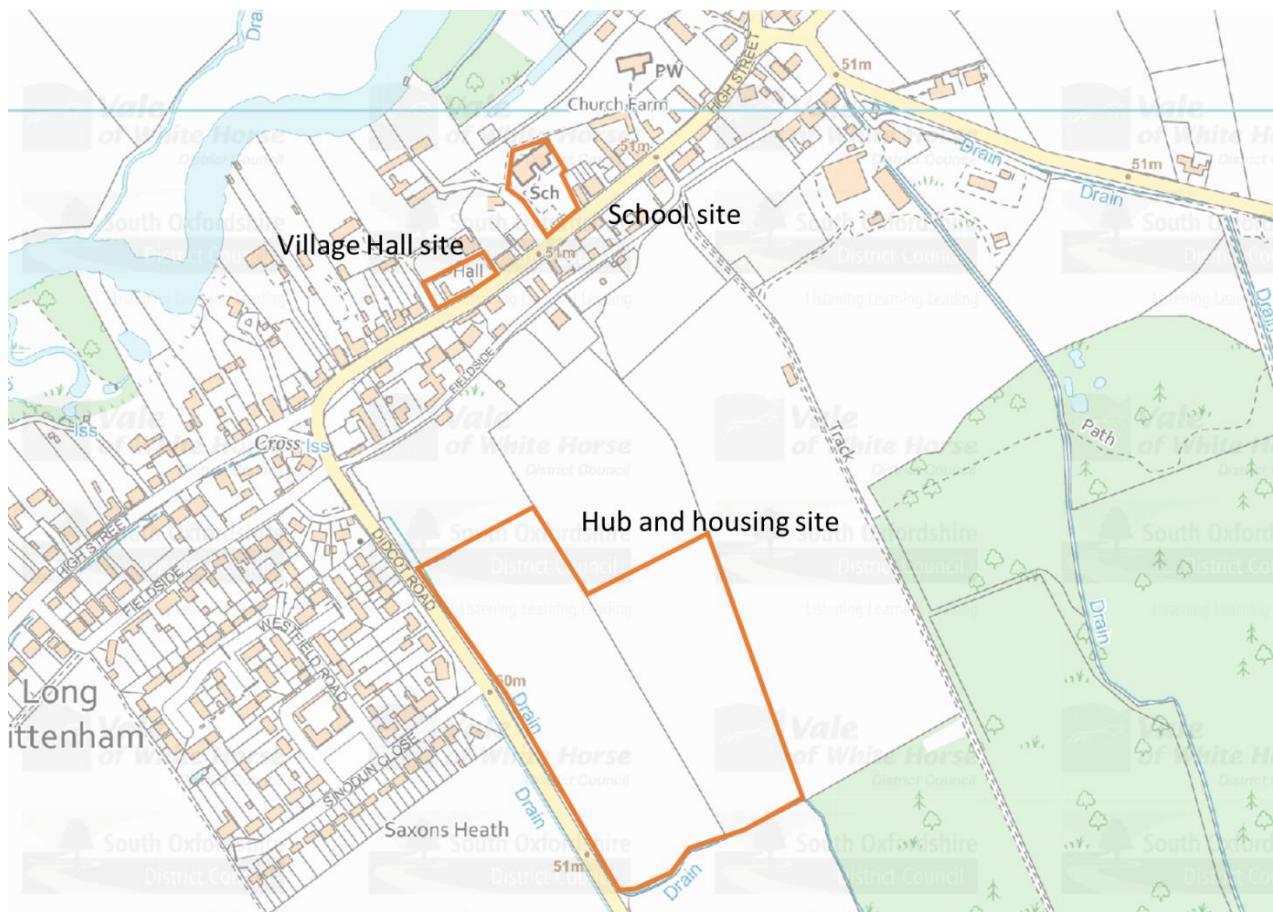
111. The Village Hall and school sites are therefore suitable to be allocated for safeguarding as enabling development in the reviewed LWNPD.

Deliverability assessment

112. Considering the three sites together (hub/housing/Village Hall/school), they have been demonstrated to be suitable, available, achievable and appropriate for housing development as identified in the SHELAA. It is therefore appropriate to allocate them in the reviewed LWNPD. The sites are shown in **Figure 5**.

Site Name	Proposal	Suitable	Available	Achievable	Housing (SHELAA)
Didcot Road	Community hub and enabling housing	Yes	Yes	Yes	Yes
Village Hall	Change of use to 2 dwellings	Yes	Yes	Yes	
School	Change of use to 5 dwellings and village green	Yes	Yes	Yes	

Figure 5: Community hub, school and Village Hall sites



Part 4: Site allocations under Local Plan policy H8

115. As explained above, Local Plan policy H8 sets out the expectation that where NDPs allocate land it should be at around 5% -10% of housing stock in 2011. The LWNPD will therefore "allocate" sites that have received planning permission between 2011 and Spring 2018 to meet the expectations of the emerging policy.

Planning permission for housing since 2011

116. An additional 40 dwellings have received planning permission since 2011, set out below. I do not think there are any more new dwellings since then but worth checking

Link to application documents	Site name and description of development	Net gain
http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P11/W1086	Willington Down Farm Ladygrove Didcot (in the parish of Long Wittenham) OX11 9BT Conversion of existing redundant barn into 2 no. dwellings.	2
https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P13/S0213/FUL	Garage adj to Downsview House & Little Stark High Street Long Wittenham OX14 4QB Change of Use from existing garage, office and shower room to one bedroom dwelling.	1
https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P14/S1264/FUL <u>P15/S0773/FUL</u>	Northfield Farm Long Wittenham OX14 4QR Change of use of existing farm buildings, yard and pond to ancillary residential use.	1
https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P15/S1910/FUL	Challis Farm High Street Long Wittenham OX14 4QH Demolition of existing barn. Erection of detached house and garage	1

http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P16/S0928/FUL	The Granary High Street Long Wittenham OX14 4QH Proposed division of existing dwelling to form additional dwelling on site.	1
https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P17/S1708/FUL	Fieldside Cottage High Street Long Wittenham OX14 4QJ Demolition of existing two storey dwelling and associated single garage building and erection of two one and a half storey semi-detached dwellings	1
http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P16/S1124/O	Land off Fieldside Track Long Wittenham OX14 4PZ Outline residential development with all matters reserved except access for up to 36 dwellings	36
Total new dwellings permitted since 2011		43

Appendix 1: Letter from Oxfordshire County Council,

9 March 2018

November 2021



County Hall
New Road
Oxford
OX1 1ND

Long Wittenham Neighbourhood Plan Team
c/o Peter Rose pwrose@gmail.com
and Andrea Pellegram
andrea@pellegram.co.uk

Director for Planning and Place
– Susan Halliwell

9 March 2018

Dear Peter and Andrea

Long Wittenham – Primary School Proposals

This letter is in response to your request asking for clarity on the County Council's position in respect of the potential relocation of Long Wittenham CE primary school.

The school is a Church of England 'controlled' school. It is a 'maintained' school, operated by Oxfordshire County Council. The school is in the process of considering conversion to Academy status as part of the Oxford Diocesan Schools Trust (ODST). If the school converts to become an Academy the school will no longer be a maintained school but instead will be managed and operated by ODST.

The ownership of the school site is split between the County Council and the school trustees, the Council own the playing field at the front of the school site. The remainder of the school site and buildings are owned by the school trustees. If the school becomes an Academy, the County Council will lease its land to ODST for 125 years.

The County Council supports initiatives that enable the re-provision of school buildings without cost to the County Council.

In respect of the current proposals for re-provision of the school we offer the following observations:

- there is no forecast need to expand the school beyond its current size of 0.5 FE (annual admission number 15) in light of the proposed number of additional houses in the village
- as a consequence, there is no anticipated potential for funding from developer contributions
- Any re-provision would have to be constructed to current standards for a 0.5FE Primary School
- Any re-provision would have to be delivered at no cost to the Council
- the trustees and Oxford Diocesan Schools Trust would need to formally support the proposals in light of their land ownership
- procurement of works given the costs of the proposals would have to comply with European legislation



November 2021

- implications of planning gain would need to be considered
- disposal of OCC land released through re-provision / any undertaking relating to the receipts from selling that land would need to account for approvals from the Secretary of State as well as formal governance within OCC.

We acknowledge that the issue is in the context of the Long Wittenham Neighbourhood Plan which was made following a referendum on 12 October 2017. I have attached the relevant policy to this letter. We understand that you wish to review the neighbourhood plan and this policy to provide a firmer basis for the community hub proposal, and consequently identify the existing school site for future housing and a village green. We would be interested in commenting on draft revised policies when they are prepared.

Yours sincerely

Lynette Hughes
Senior Planning Officer
Email: Lynette.Hughes@oxfordshire.gov.uk