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Dear Louise,

### **OXSPRING NEIGHBOURHOOD PLAN**

We write on behalf of our client Yorkshire Land Limited (YLL) and further to our recent correspondence in respect of the Oxspring Neighbourhood Plan (ONP).

Throughout the Neighbourhood Plan process to date, both we and our client have submitted numerous detailed and factual representations, and separately, formal requests to meet with the Neighbourhood Plan group, in order to discuss the ongoing preparation of the ONP and to ensure that the final version delivers a successful outcome for all.

Disappointingly, every one of our representations and meeting requests have either been ignored or rebuffed.

Our client is a key stakeholder, holding large land interests in the area, and in your position as the professional consultants appointed to progress the ONP, we wish to take this opportunity to outline some procedural matters of concern that we trust you will take into account when advising Oxspring Parish Council (OPC) prior to the publication of the next versions.

### **National Planning Legislation & Policy Guidance**

National Planning Legislation and Policy Guidance clearly states that Neighbourhood Plan bodies should plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan. More specifically [Paragraph 184](#) of the National Planning Policy Framework states that neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic policies. **They can however promote more development, especially where development proposals are considered to achieve the principles of sustainable development.**

The Town and Country Planning Act sets out at Paragraph 8(2) of Schedule 4B that a Neighbourhood Plan should meet following “basic conditions”:-

- a) *have regard to national policies and advice contained in guidance issued by the Secretary of State;*
- b) *have special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;*
- c) *have special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;*
- d) *contribute to the achievement of sustainable development;*
- e) *be in general conformity with the strategic policies contained in the development plan for the area of the authority;*
- f) *not breach, and it is otherwise compatible with, EU obligations;*
- g) *prescribe conditions that are met in relation to the plan and the prescribed matters have been complied with in connection with the proposals for the plan”*

If a Neighbourhood Plan does not meet each of the Basic Conditions then it cannot be considered a sound and robust document, thereby risking the successful 'making' of the document when it reaches the examination stage.

In respect of conformity and relationships with Local Plans, where an up-to-date Local Plan has been adopted and is in place for the wider authority area, the Neighbourhood Plan is required to support and meet the strategic policies contained within it. When a Local Plan document is emerging or is yet to be found sound at Examination, such as the Barnsley Local Plan, this creates a lack of certainty over the level of development required (particularly housing development) which a Neighbourhood Plan may be required to contribute towards.

Although a Neighbourhood Plan can progress in advance of the adoption of a Local Plan, in doing so there is the risk that policies and proposals contained within it could be rendered abortive. This is because Neighbourhood Plan policies and proposals may require amendment if the emerging Local Plan documentation is found to be unsound at examination.

In this regard, and as previously identified, YLL has concerns over the soundness of the emerging Barnsley Local Plan. They believe that the policies identified within the current draft Barnsley Local Plan, associated with the delivery of new homes in Villages and the evidence base that underpins it (such as the Green Belt Review), do not conform to national planning policy guidance. YLL also believe that Oxspring should be included within the designated area associated with the Principal Town of Penistone, on account of the inextricable and historical links between the two settlements (please refer to the 'Oxpring Fields Sustainability and Accessibility Study' which has been prepared jointly between ourselves and highways consultants 'Pell Frischmann' and is available online at [www.Oxpring-Fields.co.uk](http://www.Oxpring-Fields.co.uk)). These points are discussed further below.

With regard to the Neighbourhood Plan Basic Conditions identified above, we are therefore concerned that the policies and objectives set out in the ONP do not meet basic condition a) when assessed against national planning policy guidance and potentially condition e) should any amendments be made to the Barnsley Local Plan in respect of housing developments located within the Villages.

### **Emerging Oxspring Neighbourhood Plan & Barnsley Local Plan**

YLL has identified on a number of occasions how the Consultation Draft ONP (published in January 2015) could not be considered sound or robust in respect of the deliverability of the identified aspirations, on account of the unavailability of both the land and funding required (unless YLL's Oxspring Fields proposals are included within the ONP) and due the lack of evidence to justify the demolition and redevelopment of the existing primary school for affordable eco homes.

We do not intend to set out all of YLL's concerns again in detail here, as these are available in the previously provided documentation and on the Oxspring Fields website. The focus of this letter is to specifically identify how the results of the independent URS Housing Needs & Capacity Assessment for Oxspring (October 2014) have significant implications in respect of the soundness of both the ONP and the Barnsley Local Plan if changes are not made to the policies contained within them.

The URS Housing Needs & Capacity Assessment (the URS Study) was prepared on behalf of Oxspring Parish Council's Neighbourhood Plan Group in order to assess Oxspring's 'fair share of development' which would subsequently inform the policies and proposals of the ONP. The document concludes by identifying the need to deliver between 53 and 68 new homes in the Village in the period 2008 to 2026 (which is based on the current Barnsley Core Strategy timescale), circa 4 homes per annum. The document identifies a need for a range of house types, including affordable housing.

The figures presented in the document were generated using an assessment of the population projections at that time, alongside other available evidence. It is important to state here that updated projections were published earlier this year and that an assessment of the impact of these projections

on the housing figures for Barnsley are currently being undertaken, which may result in an increase in household growth in the Barnsley Borough area above the previously published projections. In addition, the Draft Barnsley Local Plan, with which the ONP is required to comply, now seeks to identify local planning policies for the Borough up to 2033, 7 additional years of housing need which is unaccounted for in the URS Study. There is therefore reasonable justification for the figures identified in the URS Study to be increased accordingly to a level closer to 96 new homes.

The results of the URS Study present an overriding issue for the both the policies contained within the Consultation Draft ONP and the emerging Barnsley Local Plan. **Both of these documents do not include policies which seek to meet the identified housing needs of the Village.**

YLL previously responded to the Draft Barnsley Local Plan to object to the policy approach of not seeking to identify any housing land allocations in the Borough's villages. They believe that the "U-turn" in the Council's approach from the Draft Sites & Places Plan (October 2012) is not based on sound evidence in respect of the Barnsley Metropolitan Borough Council's (BMBC) Green Belt Review and as the approach would not meet national planning policy in respect of meeting both the private and affordable housing needs required to sustain the vitality of Villages and rural areas.

The findings of the URS Study therefore confirm and add significant weight to YLL's judgment. Especially when it is considered that the study has been **independently prepared** on behalf of OPC.

In consideration of the evidence presented in the URS Study, we undertook an assessment of the available non-Green Belt housing sites located within Oxspring (Non-Green Belt Windfall and Safeguarded Land Housing Deliverability and Capacity Assessment – July 2015) to identify whether there are sufficient deliverable sites to meet the Village's identified housing needs. The findings of the assessment were clear in that excluding the existing safeguarded land at Roughbitchworth Lane (Draft Local Plan Reference 'SAF 18'), **there are no deliverable non-Green Belt sites that could meet the Village's identified housing needs.** Though the existing safeguarded site is completely unsupported by local residents and the Parish Council, it is the only non-Green Belt site that can meet the Village's housing needs in respect of its size. However, our assessment also identified that the site is not currently deliverable for a number of reasons.

Our assessment concluded that the only way in which Oxspring's housing needs could be met were through the allocation of YLL's Oxspring Fields development proposals. We further argued that the re-designation of the Safeguarded Land site as Green Belt would ensure that there was no overall loss of Green Belt land within the vicinity of the Village.

The results of the URS Study and our own assessment should also be viewed against Oxspring's recognised capacity for further growth. Unlike all other villages situated within the Western Part of the Borough, Oxspring is unique in its geographical location adjoining the Principal Town of Penistone with which it is inextricably linked. This point was recognised in the adopted UDP (Volume 13 'Western Rural Area' at paragraph 4.12) which was affirmed by the appointed Inspector:-

***"Oxspring is one of the locations in the Western Community Area for additional development because of its physical relationship to the Penistone Urban Area and because it has the infrastructure capacity to accommodate some further development without serious detriment to the quality and character of the Green Belt."***

The comprehensive 'Oxspring Fields Sustainability and Accessibility Study' (referenced above) was submitted to BMBC in January 2015 and provides further detailed evidence of the inextricable links between these two settlements, including the fact that two existing business parks which serve the employment needs of the Principal Town of Penistone, are actually located within the Parish of Oxspring. In addition the Draft Local Plan proposes a further, larger, business park in Oxspring (Draft Local Plan Reference 'P2') this being the only proposed site to serve the future employment needs of Penistone up to the end of the Local Plan period in the year 2033.

On account of the recognised inextricable links between Oxspring and Penistone, it is our view that Oxspring should be considered a part of the Principal Town of Penistone within future versions of the Barnsley Local Plan. We consider that Oxspring shares a similar geographical proximity to Penistone as that of Cubley (which is already identified as a part of Penistone), however, we believe that Oxspring has a superior connectivity in respect of the location of employment uses, accessibility to Town Centre facilities and sustainable transport links. Further proof of the inextricable relationship between the two settlements is presented through the inclusion of areas of Oxspring Parish within the defined settlement area of Penistone, i.e. Penistone's only proposed employment allocation (Ref. Site P2). This can be considered evidence that BMBC already accepts the inextricable links between the two settlements.

Furthermore, Walton and Co (Planning Lawyers of our client) have also presented factual and comprehensive evidence to BMBC which identifies that the proposed housing allocations in Penistone will **not** deliver the number of homes identified and that there are no better, or more suitable, sites in the area to make up this shortfall than the Oxspring Fields site, given the relationship of Oxspring to Penistone and the number of benefits that YLL's proposals can deliver.

Together we consider that these factors provide a compelling case for amendments to be made to the Barnsley Local Plan to enable the delivery of additional housing development in Oxspring in order to meet both the Village and the Borough's identified housing needs.

In consideration of the matters raised above we are therefore **concerned** that the work that has currently taken place on the ONP will be rendered abortive if the policies of the emerging Barnsley Local Plan are amended in the manner that we are seeking. It must be noted that YLL will not be the only party seeking amendments to BMBC's emerging planning policies in respect of the delivery of new homes within Villages. This matter will come under detailed scrutiny by the Inspector during the examination of the Barnsley Local Plan.

Notwithstanding the above, as set out by YLL in detail previously, the policies contained within the Consultation Draft ONP are required to be amended in order to meet national planning guidance in respect of deliverability and also in respect of local planning guidance, whether the policies within the Barnsley Local Plan remain unchanged or not.

The level and type of development identified within the Consultation Draft ONP does not align with the policies of the emerging Barnsley Local Plan in respect of appropriate development within the Green Belt or with regard to the redevelopment of the existing primary school building.

Therefore, even if the policies contained within the Consultation Draft ONP were deliverable in respect of land availability and funding, in order to ensure that the document aligned with local planning guidance, the policies within the Consultation Draft ONP would need to be amended.

In addition, should the Barnsley Local Plan be amended to include Oxspring as a village with the infrastructure capacity to accommodate additional housing development capable of contributing towards the housing requirements identified for the Principal Town of Penistone then the policies contained within the Consultation Draft ONP would again require amendment to ensure compliance with such a policy change.

It is therefore clear to us that unless OPC/Neighbourhood Plan Group recognise that the Oxspring Fields proposals are the only deliverable and viable way in which the identified housing needs and community infrastructure aspirations of the Village can be met (In which case, in accordance with Paragraph 184 of the NPPF, the ONP would be considered to accord with national planning guidance), we contend that further work on the ONP should be halted until the adoption of the Barnsley Local Plan, as progressing with the ONP now may render any work abortive and could needlessly waste a further significant amount of public funds.

### **Oxspring Fields Development Proposals**

As we have previously stated the Oxspring Fields development proposals have exceptional and unique planning considerations.

The Oxspring Neighbourhood Plan process has identified a number of community infrastructure aspirations which seek to retain and enhance the vitality of the Village. **The Oxspring Fields development proposals can deliver many of these identified aspirations and more.**

As identified above, the independent URS Study identifies a need for 68 new market and affordable homes, a figure that could increase to 96 homes. The Oxspring Fields development can deliver the identified housing needs of the Village, however, with the delivery of an additional 50 to 80 homes (a total of 150 homes) of which 38 (25%) would be affordable, the proposals can also viably provide other identified key aspirations and needs of the Village.

The delivery of new homes at the site is strongly supported by David Wilson Homes and will provide the opportunity to meet the identified local housing needs of the area whilst also assisting BMBC in the successful delivery of its Economic and Housing objectives which recognise the need to construct Executive/Large Family homes in locations attractive to the housing market (for both prospective developers and purchasers) within the Western Part of the Borough. This specific point was also made by BMBC's Senior Planning Policy officer, Ms Helen Willows, in the promotional video (available on the Oxspring Neighbourhood Plan website) of a meeting which took place between herself and representatives of the Oxspring Neighbourhood Plan Group in Oxspring on Tuesday 25 February 2014 (see transcript attached).

The delivery of new homes at the site will provide, at no cost to the public purse, the funding required to deliver significant new recreational facilities for Oxspring (including a sports pavilion/community facility for which OPC held planning permission for over 7 years and despite their best efforts simply cannot develop without private funding); the creation of a new country park (including a Trim Trail, Informal Sport and Picnic areas); a tourism hub located adjacent to the Trans Pennine Trail in the South Eastern corner of the country park to enhance the tourism offer of the area; access to private land in the form of the 'Oxspring Rocher Valley'; and the provision of three new pedestrian/cycle access points (including disabled access) to the Trans Pennine Trail to enhance the accessibility of the proposed new community facilities to local residents and also to increase the safety of Oxspring Primary School pupils. Importantly, these facilities will significantly contribute to delivering both OPC's and Penistone Town Council's aspirations to enhance the tourism economy of the area, whilst also meeting BMBC's key objectives to encourage the public to maintain a healthy and active lifestyle.

The proposed development will also contribute to the delivery of funding and land towards the much desired Penistone Strategic Public Transport Interchange. The delivery of this facility will create wide ranging accessibility to the area, providing commuter and tourism benefits to Penistone and Western Rural area of the Borough. The new facility will also further enhance the inextricable relationship between Oxspring and Penistone. The facility will be a 7 minute cycle commute from Oxspring along the Trans Pennine Trail, thus further enhancing the accessibility, tourism and recreational linkages of the two settlements.

The proposed Oxspring Fields development represents a sound, robust and deliverable alternative development to the proposed safeguarded land designation "SAF18", which measures 5.1 Ha in size and has the capacity to deliver up to 150 homes, which would need to be served from two new access points (North and South) onto Roughbitchworth Lane. The site is currently proposed to be retained as safeguarded land in the Barnsley Local Plan. OPC has previously made written representations to BMBC objecting strongly to the development of the site (SAF 18) for housing, citing a number of concerns, including an increase in traffic using narrow country lanes and also surface water drainage/flooding issues. Finally, and importantly, the significant role which site SAF 18 plays in the landscape certifies that it meets a number of the five Green Belt purposes as prescribed by the NPPF. In view of this, we believe that BMBC are in a defensible position to re-designate safeguarded site SAF



18 as Green Belt and in turn remove the Oxspring Fields site from the Green Belt. This method would result in no net loss of Green Belt land within vicinity of the Village whilst enabling the delivery of the identified housing needs of Oxspring up to 2033 and the myriad of community benefits listed above. Indeed, OPC has specifically asked BMBC to re-designate Safeguarded Site SAF 18 as Green Belt, in their representation to the Draft Local Plan, dated 10 January 2015.

We believe that the Oxspring Fields proposals provide an unprecedented opportunity for residents of both Oxspring and Penistone. Land, owned privately by YLL is being offered to provide substantial community benefits that will greatly enhance the sustainable development of Oxspring and the wider Western part of the Borough. If the Oxspring Fields site is not delivered, Oxspring, Penistone and the Western part of the Borough will miss out on the number of substantial benefits identified above.

Whilst OPC are presently of the view that the Oxspring Fields site cannot be considered for development within the Neighbourhood Plan as the draft Barnsley Local Plan seeks to retain the site within the Green Belt, we do not consider this to be a valid reason to constrain the development of the site and the delivery of the Village's identified aspirations. If this was the case then the aspirations identified within the Consultation Draft ONP couldn't be progressed in isolation either (*if* the land and funding was available) given the land required is located within the Green Belt. Evidence provided by YLL, and BMBC's own evidence, demonstrate that the Oxspring Fields site does not meet any of the NPPF's five Green Belt purposes; that the site will not have an adverse impact on the character of the local landscape; and in addition that the site is considered to be a 'category 1' deliverable residential development site in the 2013 Strategic Housing Land Availability Assessment, a key evidence base document undertaken by Peter Brett Associates on behalf of BMBC.

BMBC have confirmed within the emerging Barnsley Local Plan that it cannot meet its housing requirements without utilising land currently within the Green Belt (please also see the transcript attached).

Accordingly, **OPC can support and promote the release of the Oxspring Fields site** on account of its ability to deliver the identified needs and aspirations of both the Village and the wider Borough, especially when there is no other available mechanism to do so.

As identified above, Paragraph 184 of the NPPF states that Neighbourhood Plans should not promote less development than set out in the Local Plan, however, they can promote alternative allocations/designations or more development where proposals are considered to achieve the principles of sustainable development. We consider that the development of the Oxspring Fields site would enable the delivery of the NPPF's sustainable development objectives through the delivery of mutual enhancements to the economic, social and environmental characteristics of Oxspring, Penistone and the wider Barnsley Borough as a whole.

OPC/Neighbourhood Plan Group has repeatedly stated that the Oxspring Fields site is not located within the Oxspring Parish Boundary and therefore cannot form a part of their Neighbourhood Plan.

However, In February 2015, an application to extend the Neighbourhood Plan boundary was submitted by OPC/Neighbourhood Plan Group to BMBC (without prior notifying our client of their intentions) to include the field situated directly adjacent to the Parish sports ground on the South Western Edge of the village. This field forms a part of our client's Oxspring Fields Proposals but, most interestingly, is also located within the adjacent Parish of Hunshelf. The proposed Boundary extension was subsequently approved by BMBC on 20 May 2015.

Clearly, this now approved cross Parish boundary extension provides evidence that the Oxspring Fields site's location within the Parish of Hunshelf **cannot** inhibit its inclusion within the Oxspring Neighbourhood Plan Boundary by OPC/Neighbourhood Plan Group. In addition, the Neighbourhood Plan Boundary is now arbitrary and does not follow either the Parish Boundaries or defined physical features.

By extending the Neighbourhood Plan boundary again to incorporate the whole of the Oxspring Fields development proposals, the Neighbourhood Plan will comply with the guidance presented in the National Planning Practice Guidance Paragraph 033 Ref ID 41-033-20140306, as the extension would be well related to:-

- The Village or settlement boundaries, which could reflect areas of planned expansion;
- The catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities (especially in consideration of the new and enhanced facilities that the Oxspring Fields development can deliver, as set out above);
- The area where formal or informal networks of community based groups operate (the Oxspring Fields site lies immediately adjacent to the East of the existing Parish recreation ground, which will also be vastly enhanced through the delivery of new sports facilities and a Community Building/sports pavilion);
- Infrastructure or physical features which define a natural boundary, for example a major road or railway line or waterway (in this instance particular emphasis should be given to the presence of the Trans Pennine Trail, forming the sites Southern boundary, the B6462 'Sheffield Road', forming the Northern Boundary, the largely disused industrial site forming the eastern boundary and the village recreation ground forming the Western Boundary);
- The natural setting or features in an area (particularly the existence of four strong, defensible features which contain the site to the North, South, East and West, including the Trans Pennine Trail, the B6462 'Sheffield Road' the Village recreation ground and the largely disused industrial site); and
- The size of the population (living and working) in the area.

The inclusion of the whole Oxspring Fields site within the Neighbourhood Plan Boundary would not be inappropriate, indeed Oxspring is a linear settlement contained between the Trans Pennine Trail and the River Don; a point already recognised by the Neighbourhood Plan Group on their website. It is therefore unquestionable that the Oxspring Fields site relates more to the Parish of Oxspring than to the Parish of Hunshelf. The Waggon and Horse Public House, which is considered to be the heart and historical centre of Oxspring, is located within 500 metres of the Oxspring Fields site (compared to 550 metres from the safeguarded site 'SAF 18'). The development of the Oxspring Fields Proposals will therefore help to rebalance the parish, placing the key community facilities, including the sports ground and proposed community building, the Waggon and Horses public house, the post office and general store, the primary school and Saint Aidans church and community hall, at the Village's centre.

### **Conclusion**

In light of the above we consider that there is a real risk that ONP will not comply with the basic conditions set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act.

At the point of writing this letter we have a sound, fundamental and justified concern associated with OPC's approach to date, in failing to address the identified housing needs of Oxspring and the delivery of the Village's identified community infrastructure aspirations. These concerns originate with the policies contained within the Consultation Draft ONP and the policies of the emerging Barnsley Local Plan in respect of future housing developments within Villages.

We are of the view that the policies contained within the Barnsley Local Plan should be amended to ensure Oxspring's inclusion as a part of the Principal Town of Penistone and that housing allocations are returned to the Villages to ensure their continued vitality. Clearly, such policy amendments could be made prior to the Local Plan's adoption. This would in turn necessitate amendments to the ONP if the current approach is maintained. Rendering the work presently undertaken abortive if the document is progressed ahead of the adoption of the Barnsley Local Plan.

In advance of this process we believe that OPC and its Neighbourhood Plan Group should now seriously consider their position on YLL's Oxspring Fields development proposals on account of their ability to deliver both the Village's identified housing needs and community infrastructure aspirations.

Paragraph 184 of the National Planning Policy Framework identifies that Neighbourhood Plans can promote more development than that identified in adopted/emerging Local Plans. Consequently, there is an opportunity now for Oxspring Parish Council to be proactive and position themselves one step ahead of the process. Especially given the significant number of benefits that the Oxspring Fields development proposals can deliver.

In light of national planning guidance and the changeable policies contained within the emerging Barnsley Local Plan, it is our view that the preparation of the ONP is now at a cross roads.

The previous Consultation Draft ONP contained a number of policies and aspirations that are not deliverable in respect of the availability of land and funding. With regards to meeting the Village's identified housing needs, if the policies contained within the Consultation Draft ONP are maintained, by seeking to meet the Village's housing needs through the development of non-Green Belt infill sites, then it is clear that the Village's housing needs established within the URS Study will remain largely unmet. This would also be the case if the policies contained within the Draft Barnsley Local Plan remained unchanged in respect of the delivery of no new major housing developments within Villages. Furthermore, the level and type of development identified within the Consultation Draft ONP did not align with the policies of the emerging Barnsley Local Plan in respect of development within the Green Belt.

In light of this position it is our view that OPC/Neighbourhood Plan Group therefore have an important choice to make. *Do they want to deliver the Village's identified community infrastructure aspirations and housing needs or not?*

If the answer is a "yes" then the next version of the ONP should include YLL's Oxspring Fields development proposals within it. As stated above this approach would accord with Paragraph 184 of the NPPF. However, if the answer is "no", then it is our view that further work on the ONP should be halted until the adoption of the Barnsley Local Plan to ensure that any work undertaken and the use of public funding is not rendered abortive or wasteful on account of our foreseen amendments to the Barnsley Local Plan.

Finally, in respect of the question we ask above, we attach a copy of an article dated 5 October 2015 "**Housebuilder warns over neighbourhood plans**" which identifies how some Neighbourhood Plans are being used to thwart development rather than properly addressing the identified needs of the village and how those needs can be successfully delivered.

Our client is concerned that leading members of OPC/Neighbourhood Plan Group and its Steering Committee have publicly made known their strong personal opposition to development in Oxspring.

Within the last week, the government has set out clearly that it intends to make it harder to frustrate plans seen as vital to the country's future and has today pledged a crusade to build hundreds of thousands of new homes to tackle the housing crisis. Mr Cameron has also stated that he believes it is "unacceptable to have people in their thirties waking up each morning in their childhood bedrooms". Taking these two points into account we feel it is necessary to identify that unless the ONP is amended the housing needs of the Village will not be substantially met until at least 2033. The result being that children who currently reside within the Village will potentially need to leave the Village to find a new home.



Which is one of the many factors why our client continues to receive genuine support for their proposals, from both residents of Oxspring and others who welcome the opportunity to move into the village.

As we have set out above, the independent 'URS' study, which was prepared on behalf of the OPC using public funds, has identified a housing need for Oxspring. We consider that **this core evidence base document should not be disregarded** by either the OPC or BMBC.

We therefore hope that in your professional capacity that you will advise OPC of the need to fulfil the independently assessed housing needs of the parish, irrespective of any personal views of its members.

We trust that the comments made will be taken into consideration when you are advising OPC in the preparation of future versions of the ONP. Should you need any further information or wish to discuss any of the points made in these representations further, please do not hesitate to contact me.

Yours faithfully



**PAUL BUTLER**

Director

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Enc.

Oxspring NPG Video Transcript