

**MATTER 3 – OVERALL HOUSING PROVISION IN THE PLAN
AND ITS DISTRIBUTION BETWEEN SUB-AREAS**

Response on behalf of

Barberry East Hendred Ltd. – 1145333

MATTER 3

Introduction

1. Harris Lamb Property Consultancy (HLPC) are instructed by Barberry East Hendred Ltd. (BEH) to prepare a response to the Inspector's issues and questions in relation to Matter 3. BEH are promoting land to the east of High Street, East Hendred as a proposed housing site to accommodate up to 150 dwellings either as an alternative allocation to those currently included in the Plan or as an additional allocation should further sites be required. Our comments to Matter 3 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Questions

- 3.1) *Is the proposal in the LPP2 to allocate 1,400 additional homes in the South East Vale Sub Area to support the economic growth of the Science Vale consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?***
2. Firstly, we wish to comment on whether the 1,400 dwellings that are proposed for allocation in the South East Vale Sub Area (SEVSA) are actually additional or not. Paragraph 2.95 of the Part 2 Plan confirms that modifications to the Part 1 Plan removed two sites proposed on land adjoining Harwell Campus, whilst paragraph 2.96 goes on to confirm that the two sites removed reduced the planned housing supply in the Science Vale area by 1,400 dwellings. The 1,400 dwellings that are now proposed in the Part 2 Plan are not in fact additional dwellings over and above the planned supply, but simply replacement allocations for what the Council were originally planning for.
3. Notwithstanding the above clarification, we welcome the fact that additional allocations are proposed for the SEVSA. The Part 1 Plan sets out the Spatial Strategy for development in the District and confirms at paragraph 5.52 that 75% of the planned strategic housing growth and around 70% of the projected new jobs are to be located in the SEVSA. Furthermore, there are two significant employment areas located in the SEVSA including Harwell Campus and Milton Park. Paragraph 5.54 of the Part 1 Plan confirms that the Science Vale is one of the key growth areas within the Oxfordshire Strategic Economic Plan and is a focus for significant investment, equating to approximately £95 million of Government investment for the County.
4. In seeking to deliver this level of investment, the Part 1 Plan at paragraph 5.60 confirms that the focus for development in the SEVSA is for new employment growth at Harwell Campus and Milton Park, but delivered alongside strategic housing and infrastructure provision in order to support sustainable growth. In light of the strategic objectives of the Part 1 Plan and the Spatial Strategy, we consider it wholly appropriate that the Council are proposing to allocate a further

(not additional) 1,400 dwellings within the SEVSA and that this approach is entirely consistent with the Council's strategy as set out in the Part 1 Plan.

5. Notwithstanding our view that the approach is correct, we refer back to the content of Paragraph 2.95 of the Part 2 Plan, which confirms that two strategic allocations that were proposed at Harwell Campus in the Part 1 Plan were proposed for removal from the Plan. We find it somewhat surprising that in light of a previous Inspector's conclusions (extract attached at **Appendix 1**) that the Council are proposing an alternative allocation for 1,000 dwellings at Harwell Campus. We do not propose to comment further on this point in this statement and return to in Matter 7.
6. Whilst we, therefore, agree with the intention to allocate sites for 1,400 dwelling in the Part 2 Plan in that this is consistent with the Spatial Strategy, we object to the Council's proposed allocations, and will return to this point in our submission to Matter 7.

3.2) *Is the proposal in the LPP2 not to allocate additional sites in the Western Vale Sub Area consistent with the strategy in the LPP1 and supported by proportionate evidence?*

7. No comment.

3.3) *Taking the objectively assessed housing needs of the Vale and the unmet needs of Oxford together, is the overall housing provision in the LPP2, its distribution between sub areas and its various components, consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?*

8. In terms of the overall provision of housing being proposed by the Council within the Part 2 Plan, our representations noted that South Oxfordshire, who are also currently preparing a Local Plan, were not proposing to accommodate in full, their apportionment of Oxford's unmet housing needs. This equated to approximately 1,200 dwellings that are required to be provided in the HMA, but for which no authority is currently proposing to accommodate. There is, therefore, a question mark over where, and how, these dwellings should be provided, and as such, should the Vale of White Horse be expected to accommodate a proportion of these.
9. Notwithstanding the point above, Core Policy 2 of the Part 1 Plan confirms the Council's intention to work co-operatively with the other Oxfordshire authorities, via the duty to cooperate, in order to meet the unmet housing needs of Oxford City. Furthermore, the housing requirement that is set out in the Part 2 Plan confirms the proportion of Oxford City's unmet needs that the Council has agreed to provide and the Plan then sets out how the Council intend to accommodate this within its own Spatial Strategy.
10. We consider that the approach the Council has taken to distributing the overall housing requirement between the sub areas is consistent with the strategy set out in the Part 1 Plan.

3.4) *How would the overall provision of housing in the district be monitored to ensure delivery? Is the housing supply ring fence for the Science Vale area still relevant and necessary?*

11. We have no comments on how overall provision of housing within the District will be monitored.

12. Core Policy 5 of the Part 1 Plan sets out the Council's intention to employ a ring-fence approach to housing delivery in the Science Vale area. The justification for pursuing such an approach is set out in paragraph 4.19 of the Part 1 Plan in that it will support the delivery of the Spatial Strategy, by concentrating housing growth and infrastructure investment in a particular geographic area.
 13. As the Council's strategy is for delivering the majority of housing and jobs for the District in the SEVSA/Science Vale area we still consider that the ring fence approach is necessary and relevant. We consider that it would assist with directing the relevant quantum of housing and jobs to where they are needed and believe that it is a positive planning tool that will enable the Council to deliver its Spatial Strategy and development objectives.
 14. Notwithstanding our general support to ring fencing development in the SEVSA, we do not support the Council's proposed housing allocations in the SEVSA in order to achieve the housing growth and job creation that are envisaged, and as set out in representations we consider that alternative sites, such as the one at East Hendred, would still enable the Council to meet its objective and Spatial Strategy but in a more sustainable manner. We return to this point in our response to Matter 7.
- 3.5) *Does the LPP2 provide for the housing needs of Gypsies, Travellers and Travelling Show People as envisaged by, or in a manner consistent with, Policy CP27 of the LPP1?***
15. No comment