

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

**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 LPP1, supported by proportionate evidence and deliverable?**

3.3.1 We propose to respond first to Q3.3 because our wider assessment of the distribution of dwellings between Sub-Areas informs our assessment of the proposal for an additional 1,400 dwellings in South East Vale, the subject of Q3.1.

3.3.2. The distribution of dwellings between South East Vale and the rest of the District in LPP2 has departed very substantially from the intentions of LPP1. A good starting point to identify these is the answers by the Council to Q1 and Q2 of the Inspector's Initial Questions on 27<sup>th</sup> March 2018 (PC01 and PC01.1). The answers give respectively the district-wide and Sub-Area breakdowns of the housing components.

3.3.3 The figures which appear under the headings of Completions, Known Commitments and Windfalls change as time passes because dwellings move from one category to another through the development process. Whether a figure happens to be more or less than it was a few months or years earlier is therefore unlikely to be of strategic consequence. We consider this applies to the change in these figures over a single year between LPP1 and LPP2.

3.3.4 The Council's answer to Q1 shows the principal changes: the overall housing requirement has increased and the LPP2 allocations have increased. The increase in housing requirement from 20,560 to 22,760 is a consequence of the decision that Vale of the White Horse should accommodate some of Oxford City's unmet housing needs. The quantum chosen was 2,200 houses, decided too late for inclusion in LPP1. The principle (but not the number) was anticipated in Core Policy 2 in LPP1. We are not in a position to comment on the selected figure.

3.3.5 The LPP2 housing allocations have increased from 1,000 to 3,450. At first sight, the expectation might have been for an increase from 1,000 to 3,220 to reflect the additional supply to meet Oxford's needs, but there are other issues in the mix too.

(i) With the passage of time and an additional year's permissions and developments, the sum of completions, commitments and windfalls in LPP1 (8,373) had increased a year later in LPP2 (to 8,841). The difference (468) no longer needed to be supplied by means of local plan allocations in LPP2.

(ii) Core Policy 4 of LPP1 explains in footnote (b) that "The Local Plan Part 2 allocation [of 1,000 houses] will be reduced where dwellings are allocated in Neighbourhood Development Plans or come forward through the Development Management Process". In practice it is not clear that allocations in Neighbourhood Plans have been taken into account, such as the 'made' Drayton Neighbourhood Plan with allocations for 255 dwellings.

3.3.6 The variations in allocations between LPP1 and LPP2 are much more pronounced at the Sub-Area scale as the Q2 answers in PC01.1 demonstrate. The distribution of dwelling

supplies between the Sub-Areas reflects a number of different arguments which the Council has put forward. These arguments overlap and have not been expressed clearly. They concern: supplying Oxford's unmet needs; the distribution of the 1,000 dwellings anticipated by Core Policy 4 in LPP1; the intended dissolution of some of that 1,000 dwelling requirement; and the replacement of dwellings deleted by the Inspector from LPP1.

3.3.7 First, Core Policy 4a of LPP2 is clear where Oxford's unmet need should be delivered: "2,200 dwellings will be provided for through either strategic or additional sites provided for within the Abingdon-on-Thames and Oxford Fringe Sub-Area." In short the intention is rightly to meet those needs close to Oxford. Amongst other benefits, that would reduce commuting over greater distances on the already congested A34 from South East Vale. However, the total new allocations to the Abingdon-on-Thames and Oxford Fringe Sub-Area in Core Policy 4a total 2,020, failing to achieve what that same policy intended. The Plan attempts to explain away this discrepancy by arguing that the 2,200 dwellings are not ring-fenced to that Sub-Area and that some of the previously allocated sites there can contribute to meeting it (paragraph 2.15-16). Despite this assertion, the consequence in numerical terms is that, with no allocations in the Western Vale Sub-Area, the missing 180 dwellings have effectively been transferred to South East Vale.

3.3.8 Second, the 1,000 houses referred to in Core Policy 4 for allocation in LPP2 have been distributed very differently from the way in which LPP1 intended (in Core Policies 8, 15 and 20). Taking the way it is set out in PC01.1, the Council's response to the Inspector's initial Questions (Q2), 722 were allocated to Abingdon-on-Thames & Oxford Fringe, 222 to Western Vale and just 56 to South East Vale. In LPP2, the Council almost entirely reversed the allocations. South East Vale's was raised to from 56 to 1,400. This figure also incorporated all the LPP1 allocations to Western Vale (whose figure is reduced from 222 to zero) and the 722 from Abingdon and Oxford Fringe Sub-Area (because that last Sub-Area did not even supply the amount it should have done to meet Oxford's unmet need, as noted in 3.3.7 above). Therefore, in LPP1 terms, South East Vale took all 1,000 dwellings.

3.3.9 Third, no allowance has been made in the Sub-Areas for the extent to which the 1,000 house allocation in LPP2 anticipated in LPP1 should have dissolved. The provision through development management (468) and through allocations in Neighbourhood Plans (at least 255), noted in paragraph 3.3.5 above, have simply been neglected. The policy in Core Policies 4a, 8a, 15a and 20a has actually been reversed from LPP1, to state that these will now be additional contributions rather than deducted from the provision for 1,000 dwellings made in LPP1. Each LPP2 policy states: "Additional dwellings (for example, windfalls) will be delivered through Neighbourhood Development Plans or through the Development Management Process."

3.3.10 Fourth, the rhetoric of LPP2 is that the Council proposes to replace the 1,400 houses deleted from LPP1 by that Plan's Inspector, for reasons set out in paragraph 2.96, and 1,400 is indeed the fresh LPP2 allocation in South East Vale. Our Statement on Matter 7 demonstrates that the Inspector did not expect the 1,400 dwellings which he removed from LPP1 around Harwell Campus to be replaced at all.

3.3.11 The overall supply position in LPP2 by Sub-Areas is set out in Core Policies 8a, 15a and 20a. These show that LPP2 is planning to over-supply dwellings substantially against requirement figures, even neglecting allocations in Neighbourhood Plans:

Abingdon-on-Thames and Oxford Fringe: requirement = 7,512, supply = 7,570 (= +58)

South East Vale: requirement = 12,150, supply = 13,362 (= + 1,212)

Western Vale: requirement = 3,098, supply = 3,816 (= +718)

This level of supply clearly goes far beyond the requirements in both South East Vale and Western Vale.

3.3.12 The significant departure of the distribution of housing, and its component parts, in LPP2 from that set out in LPP1 is not justified. It is not supported by proportionate evidence. The Council has made various statements about some of the component parts, but these either do not do what the LPP2 policies say they will (on accommodating Oxford's unmet need), reverse what LPP1 said (on additionality of dwellings from Neighbourhood Plan allocations and through development management decisions), or try again to make allocations which the LPP1 Inspector specifically rejected (at Harwell). There is overlap between these, made worse by not taking forward carefully the 1,000 dwelling allocation envisaged by LPP1 in Part 2. That overlap has caused considerable confusion which we have tried to rectify. The proposed housing provision ought not to be delivered.

3.3.13 This oversupply and its distribution has real consequences for the Area of Outstanding Natural Beauty, which the North Wessex Downs AONB Unit is charged with sustaining. Well over 50% of South East Vale is designated AONB, so increasing housing allocations in this Sub-Area could present risks to the AONB and its setting. That is exactly what LPP2 does by its failure to take forward the policies agreed in LPP1. The proposed allocation of 1,000 houses at Harwell, as the main part of the 1,400 additional houses proposed for South East Vale, would be within the AONB and harmful to it. Other over-supplies of housing around the District (identified in paragraph 3.3.11 above) would remain to be considered: those are beyond the AONB Unit's remit.

**3.1 Is the proposal in the LPP2 to allocate 1,400 additional homes in the South East Vale Sub Area to support economic growth of the Science Vale consistent with the strategy in LPP1, supported by proportionate evidence and deliverable?**

3.1.1 No. The submitted Plan LPP2 is confused (in numerical terms) about what purpose these 1,400 houses in South East Vale will actually serve (see our response to Q3.3). Arrangements have already been made for housing development in this Sub-Area on a very substantial scale.

3.1.2 This proposal is not consistent with the strategy for development and growth in the South East Vale Sub-Area established in LPP1, which has already considered the issues now being raised again by the Council. The scale of growth and the compatibility between employment generation and dwelling supply were addressed in LPP1 and considered in detail by the Inspector. The Inspector accepted the Council's dwelling requirement figure, its employment forecast, a ring-fence for housing supply within most of South East Vale (so that housing supply should not fall behind employment in this area), and its employment

land supply. A dwelling supply was agreed which would over-supply against requirements by about 1,300 (even after deleting the proposed Harwell Campus allocations). In these circumstances it is hard to understand what further increase might be made to dwelling supply that would be compatible with LPP1.

3.1.3 As well as unnecessarily ‘replacing’ the dwellings deleted from the Proposed LPP1 at Harwell, the Submitted Plan makes four claims why the additional 1,400 dwellings are ‘required’ (paragraph 2.96) around the theme of supporting economic growth in the Sub-Area (principally at Harwell). This is where the claims on the theme of Q3.1 are most precise. They recycle arguments considered at the Examination of LPP1 and which failed to convince the Inspector at that time.

3.1.4 The first of the four points is to achieve a ‘sustainable balance of housing and employment’ “by ensuring that housing is located close to the provision of new jobs and is accessible by sustainable modes of travel”. This was debated extensively at the LPP1 Examination. The Inspector’s main conclusion on this point was that “Evidence in the form of third party ‘validations’ refers to the need for convenient and affordable housing (particularly to rent), although there is nothing to suggest that this could not be appropriately provided for a short distance from the campus outside the AONB.” There is nothing new in this first argument, and we consider it should not have been repeated in LPP2.

3.1.5 The second of the four points is to “help to deliver the Science Vale Strategic Infrastructure Package through developer contributions”. This is a reference to Oxfordshire County Council’s Local Transport Plan 2015-2031 ‘Connecting Oxfordshire’. The 2015 draft of this was document TRA10 at the LPP1 Examination and received appropriate attention. The Inspector referred briefly to the issue of its implications for the Science Vale in his paragraph 148. There is nothing new in this second argument, and we consider it should not have been repeated in LPP2.

3.1.6 The third of the four points is to “support the Oxfordshire LEP priority for accelerating housing delivery within the Oxfordshire Knowledge Spine growth corridor”. This argument is wide of the mark because the Spine extends as far north as Bicester rather than being specific to South East Vale. Nonetheless, the *Oxford and Oxfordshire City Deal* and the Oxfordshire LEP in its *Strategic Economic Plan* both support additional housing provision in the South East Vale. Both these documents (TRA04 and ECO010 respectively), referenced from paragraph 2.96, were considered at the LPP1 Examination and were taken into account in the Plan’s preparation and approval. The Inspector considered the relevance of LEP advice to housing at Harwell in his paragraph 115. There is nothing new in this third argument, and we consider it should not have been repeated in LPP2.

3.1.7 The last of the four points is for Harwell Campus to “deliver bespoke housing types and tenures tailored specifically to meet the identified business and local economic needs of the Campus”. Appended to its statements to the Examination of LPP1 in January 2016 (in 216 pages, 29MB), the Harwell Campus Partnership included a ‘Needs & Delivery Report’ dated December 2015. This reported that it had “assessed mix, tenure and demand numbers to arrive at a properly conceived overall concept and phasing plan”. It summarised

the proportions of each tenure it considered appropriate, based on a 'Harwell Economic Review' by Quod, also appended. They both contained this tabular summary:

	%		
Market Sale	25-35%	65%	Private
Build to Rent	30-40%		
Intermediate Sale	5-10%	35%	Affordable
Intermediate Rent	15-20%		
Starter Homes	5-10%		
	100%		

For the LPP2 Examination the Campus Partnership has also issued a report by SQW, 6<sup>th</sup> October 2017, addressing the same issue as part of a 'Harwell Campus "Exceptional Circumstances" report'. This has exactly the same proposal, in Table 4-1 on page 18. The material previously taken into account by the LPP1 Inspector in his decision is simply being recycled in LPP2. There is nothing new in this fourth argument, and we consider it should not have been repeated in LPP2.

3.1.8 Furthermore regarding the fourth point, the proportions of private and affordable homes proposed are similar to housing provision generally. Adopted LPP1 requires in Core Policy 24 that 35% of dwellings should be affordable, so the proposal is no more than policy compliant. The mix of private dwellings gives greater emphasis to build-to-rent, but the SQW report clarifies that this is not to keep rents particularly low for staff but to benefit the Campus Partnership. While not profit-maximising, "It includes a substantial proportion of build to rent homes, which would be managed professionally on behalf of the Campus and held for the long term as an income-generating asset. It believes this mix is better aligned to the incomes and needs of Harwell staff" (paragraph 4.24).

3.1.9 Particularly egregious is the Council's continued attempt to build a very large number of houses in the North Wessex Downs AONB at Harwell Campus, comprising the large majority of the 1,400 dwellings proposed. The same number of houses at this single location was completely rejected by the Inspector for LPP1. The Inspector did not expect the 1,400 dwellings which he removed from LPP1 around Harwell Campus to be reinstated in the AONB. The case for development at Harwell Campus is not easy to disentangle from the case for additional development in South East Vale (and we address the issues arising in more detail under Matter 7). One point to come out of the Examination of LPP1 concerned the landscape impact of the development which at that time was proposed on land to the immediate east of Harwell Campus. The first landscape consultancy employed to advise the Council on this recommended against development in that location on landscape grounds. Asked why the Council had then employed a different landscape consultancy, HDA, the Council specifically admitted to the Examination that it was because the first consultancy had given 'the wrong answer'. The Council appears to be taking the same approach to the

Examining of its Plans for Harwell Campus. We consider that the Council should abide by the decisions it has been obliged to adopt in LPP1.

3.1.10 The specific allocation of 1,000 dwellings at Harwell Campus within the AONB is as unjustified now in LPP2 as it was in LPP1. This oversupply of dwellings and damage to the AONB through LPP2 is entirely avoidable. In dwelling supply terms, the extra 1,000 houses proposed to be allocated at Harwell do not have to be allocated in the AONB to meet the District's housing requirements. This extra housing does not have to be allocated in South East Vale to meet the District's housing requirements. Indeed, the extra housing does not have to be allocated at all to meet the District's housing requirements. The allocation is contrary to LPP1 and should be deleted. A substantial over-supply of dwellings against requirements already exists, and there is no need whatever to make this even greater.

3.1.11 Revisiting these issues is not what LPP2 was intended for. The proposal for an additional 1,400 houses in South East Vale for the purpose stated is unjustified. It is not supported by proportionate evidence and should not be delivered.

11 June 2018

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