
Examination into the Vale of White Horse District Local Plan 2031: Part 1 Strategic Sites and Policies

Written Statement on behalf of Ptarmigan Planning Ltd. and Landowners

Hearing Statement: Matter 1

Respondent Reference: 873607

August 2015

**Examination into the Vale of White Horse District Local Plan 2031:
Part 1 Strategic Sites and Policies**

Written Statement on behalf of Ptarmigan Planning Ltd. and Landowners

Hearing Statement: Matter 1: Duty to Cooperate and Other Legal Requirements

Respondent Reference: 873607

Project Ref:	23804/A5/P4/HB
Status:	Draft
Issue/Rev:	P4
Date:	August 2015
Prepared by:	Hannah Bowler
Checked by:	Robin Shepherd

The Blade
Abbey Square
Reading
Berkshire
RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

Ref: 23804/P4/A5/SD/slh

Date: August 2015

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

1.0 INTRODUCTION

1.1 This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2011-2031: Part 1 on behalf of Ptarmigan Planning Ltd. and Landowners (hereafter referred to 'our Client').

1.2 This statement refers to the following Issue, identified by the Inspector in his Matters and Questions:

- Matter 1 – Duty to Co-operate and Other Legal Requirements

2.0 MATTER 1 - DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

Has the Council satisfactorily discharged its Duty to Co-operate to maximise the effectiveness of Local Plan preparation in the context of strategic cross Boundary matters, including in particular mineral and waste and housing? (see also Matter 4)

- 2.1 Barton Willmore, on behalf of our Client is broadly satisfied that the Council has satisfactorily discharged its requirements under the Duty to Co-operate noting specifically that the Council has responded to the publication of the Oxfordshire wide SHMA by reviewing the overall development needs of the District and increasing the housing provision accordingly.
- 2.2 Under Section 110 of the Localism Act 2011 there is a requirement for a local authority to **engage constructively, actively and on an ongoing** basis throughout the preparation of development plan documents. The approach adopted by the Vale of White Horse (VoWH) and set out within the Duty to Cooperate Topic Paper 02 is reflective of that undertaken by Cherwell District Council, where the Inspector found that they had satisfied the Duty. VoWH have engaged constructively through its involvement within the Oxford Growth Board, the Oxfordshire City Deal and the Oxfordshire Local Enterprise Partnership all of which have assisting in guiding the spatial approach to the plan. In addition, through draft Core Policy 2 VoWH commits to ongoing engagement with regard to the unmet needs of Oxford City.
- 2.3 Core Policy 2 sets out the position in relation to the likely unmet housing need from Oxford City and our client is encouraged that the inclusion of this policy allows for a full or focused review of the plan at the appropriate stage following the identification of the quantum of need that cannot be met within Oxford City's administrative boundaries and which will need to be accommodated within the VoWH. This is fully in accordance with Paragraph 153 of the National Planning Policy Framework (NPPF) which states that Local Plans can be "reviewed in whole or in part to respond flexibly to changing circumstances".
- 2.4 The Council's membership of the Oxfordshire Growth Board demonstrates, in our clients view, that the Council is committed to working together with its adjoining authorities and other key local stakeholders, such as the Local Enterprise Partnership (LEP), to ensure

that the full development needs identified in the SHMA are delivered in the most appropriate way to support the Oxford City Deal objectives of, amongst others:

- Speeding up the development of homes across the county; and
- Helping small and medium enterprises to get better support through a Growth Hub.

2.5 As a result of this on-going engagement, VoWH has been pro-active in acknowledging its role in supporting the future growth of the Science Vale given its cross-boundary strategic importance in delivering economic growth within Oxfordshire, which is embraced within the Local Plan Part 1 and forms a key element in the overall spatial strategy to 2031.

2.6 Our client does, however, consider that a minor modification should be made to the policy to include a timescale for this work to be undertaken once the need has been identified. This will ensure that any strategic/ cross boundary matter regarding unmet housing need will be addressed within a specified timescale, providing certainty to the plan-led process. Whether the approach taken at Cherwell for the partial review to be completed within two years of adoption given the estimated timescales at present **or** whether a requirement for the review to commence within six months of the unmet need being identified would be more appropriate will be a matter for the Inspector to determine. However, either approach will provide the level of certainty required to demonstrate commitment by VoWH to addressing its proportion of Oxford City's need in the future.

2.7 Our Client considers that VoWH has therefore satisfactorily discharged the requirements of the Duty to Co-operate through:

- engaging actively within the Oxfordshire Growth Board, Oxfordshire LEP and other parties as documented through VoWH Topic 2;
- ensuring continuous engagement at each stage of the plan making process with relevant bodies and addressing any emerging information that influence the spatial strategy for the District; and
- being constructive in addressing identified strategic matters and being proactive in delivering sustainable solutions to cross-boundary influences such as the Science Vale within the spatial strategy for the Plan.

Are the likely environmental, social and economic effects of the plan adequately and accurately addressed in the Habitats Regulation Assessment and Sustainability Appraisal? Does the SA test the plan against all reasonable

alternatives in terms of the overall requirement for land for housing and employment (see also Matters 2 and 4) and its broad spatial distribution (see also matter 3)

- 2.8 Our Client considers that the Council has adequately and accurately addressed the environmental, social and economic effects of the plan in both the Habitats Regulation Assessment and the Sustainability Appraisal (SA).
- 2.9 In respect of the reasonable alternatives, the Council has considered a range of alternative options to those put forward within the submitted Plan and has outlined those within the SA (paragraph 10.3.2) and were refined to:
- Urban Focus – Greater growth across the larger villages alongside urban extensions;
 - Concentrates the vast majority of growth towards the urban area;
 - Recognises that whilst the urban areas will still take the bulk of the housing growth, the rural areas will also have a significant but proportionate housing and economic growth.
- 2.10 Such an approach was identified given the settlement and development patterns, location and capacity of land potential suitable for development. As such, the spatial strategy has focussed on locations which result in reducing the need to travel and in close proximity to existing services and employment opportunities.
- 2.11 In particular the Council gives full and careful consideration to the matters in relation to Harwell Campus at Section 12 of the SA. Paragraph 12.2.6 explains that every potential site in and around the Campus was considered by the Council, as well the options of an alternative spatial strategy and a lower housing target. Our client agrees with the Council that a lower housing target is not an appropriate option and that this approach would result in an unsound plan as the Council would not be meeting their full Objectively Assessed Need, as required by the NPPF.
- 2.12 In respect of an alternative spatial strategy we note that this is referred to both by Natural England and by Chilton Parish Council in their previous representations to the Local Plan, both in relation to Harwell Campus and in relation to the Science Vale as a whole. In reviewing the spatial strategy, careful consideration must be given to the specific circumstances of the Harwell Campus and the Science Vale area, in terms of economic contribution and growth over the plan period.

- 2.13 The Oxfordshire Local Economic Partnership (LEP) comprises members from the local authorities and business interests in Oxfordshire and is responsible for developing the Oxfordshire economy. It brings together those responsible for housing, planning and transport in the county to ensure an holistic approach to planned economic growth.
- 2.14 In March 2014, the LEP prepared the Oxfordshire Strategic Economic Plan (SEP), to bid for Local Growth Fund funding from the Government. A Growth Deal was agreed which will see at least £108.6million invested in Oxfordshire. £15.7million has been confirmed for 2015/16, and as part of the Government's on-going commitment to the Oxfordshire LEP it has provided an indicative award of a further £92.9million of funding from 2016/17 onwards. Growth Deal funding will contribute to a Sustainable Energy Research and Innovation Facility and a research village at Harwell.
- 2.15 The LEP will also oversee continued infrastructure improvements which will provide improved connectivity to Harwell Oxford Campus, including the introduction of Science Transit, which seeks to deliver public transport improvements to support housing and economic development to support the knowledge economy.
- 2.16 The Science Vale area of the District includes two enterprise zones, Harwell Campus and Milton Park. The economic forecasts underpinning the Local Plan are clear that almost 70% of the new jobs forecast for the district up to 2031 will be located within the Science Vale area, principally at those two Enterprise Zones. It is therefore logical and appropriate that a large proportion of the housing required for the plan period is also located in the Science Vale and in easy reach of the two Enterprise Zones and with connections to the proposed Science Transit. An alternative approach of providing housing elsewhere (outside of the Science Vale) would result in unsustainable growth where travel patterns would be unsustainable and economic growth would be hindered.
- 2.17 Harwell Campus is an existing area of major development, being the home of the Diamond Synchrotron as well as the European Space Agency and a number of other nationally and internationally important research and development facilities and as such is a campus of national and international significance. The Campus has grown significantly in recent years, which is considered to be reflective of Paragraph 116 of the NPPF which notes that major development in AONBs should be considered in light of the need for the development, including in terms of national considerations.
- 2.18 The Oxford and Oxfordshire City Deal provides commitment from Government for further investment in the Harwell Campus, including up to £14.1 million for an Innovation Hub. This investment of the national level demonstrates the importance of the site and its

continued growth. Coupled with the business rate reductions and other incentives offered by the allocation of part of the Campus as an Enterprise Zone, our client considers the Council's suggestion of an increase of 15,850 jobs within the Science Vale area to be wholly realistic.

- 2.19 The decision to focus economic growth at Harwell is therefore longstanding and already established, with the Local Plan seeking to ensure its further growth and delivery over the plan period. VoWH are therefore acknowledging, through Local Plan Part 1, the importance of re-aligning the economic growth with the other sustainability objectives identified at paragraph 7 of the NPPF. With an increase in job growth there will be an inevitable increase in housing demand within the area, arising from the growth of business, new enterprises and the relocation of international significant facilities from overseas.
- 2.20 The result is for future housing provision to meet economic needs including for those relocating from overseas and as such address such barriers to investment as required under paragraph 21 of the NPPF. The most appropriate sustainable location for that housing will be close to where the jobs are, in locations with easy access to facilities and services providing a truly mixed use solution in accordance with the core planning principles of the NPPF (paragraph 17). Indeed a joint venture between the UK Atomic Energy Authority, the Science and Technologies Facilities Council and Development Securities is responsible for developing the campus into a vibrant community of scientists and technologists but this cannot be done through the creation of additional jobs alone. The success of the campus (as evidenced from other science and technology campuses through the world) depends on creating this vibrant mixed use environment. To do anything else would create a significant barrier to the growth of Harwell and the Science Vale.
- 2.21 Harwell Campus already provides a number of services and facilities to its workforce but there is an identified shortfall of housing within the area, which is already understood to have an adverse impact upon recruitment and upon attracting new businesses to the Campus. The SA identifies opportunities for creating new development at Harwell give the sustainable nature of Harwell campus and by increasing the supply of housing and ensuring accessible services this will support the economic role of the Campus both now and more so in the future within the District and across Oxfordshire thus acknowledging paragraph 7 of the NPPF.

- 2.22 Whilst the Council has, therefore, properly considered alternatives for the development strategy within the SA, rightly concluding that the specific and unique circumstances at Harwell Campus are such that the most appropriate strategy includes providing for sufficient housing adjacent to the Campus itself, ensuring that the needs of the Campus are met as well as those of the District overall. Whilst this may be within the AONB, contrary to the assertions of Natural England and the Parish Council, Harwell Campus cannot be relocated nor the activities undertaken replicated either within the District or elsewhere within Oxfordshire.

Is it appropriate for the plan to include only Strategic Policies and Site Allocations and for detailed planning policies and non-site strategic site allocations to be devolved to a Part 2 Local Plan document. Is there a clear justification for this and does it accord with national policy?

- 2.23 Paragraph 153 of the NPPF states that additional Development Plan Documents should only be used where clearly justified. The Council's Local Plan Part 1 has been prepared setting out only the strategic policies and site allocations, with the intention of Part 2 of the plan bring forward details planning policies and non strategic site allocations.
- 2.24 Our Client is satisfied that this is an appropriate way for the Council to proceed, in particular given the quantum of development being proposed through the plan and that to deliver that level of development there is a need for Green Belt land to be released and for land within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) to be allocated for development. This approach also allows for the unmet need from Oxford City to be accommodated, should the extent of that need become apparent during the preparation of the Local Plan Part 2. Given the complexity of the planning issues within VoWH with regard to the unique nature of the Science Vale and the scale and distribution of development required, it seems justifiable for the focus to be firstly on strategic matters, ensuring these are adequately addressed before then turning to non-strategic matters.

Is the plan compliant with: (i) LDS, (ii) SCI, (iii) 2004 Act and 2012 Regulations

- 2.25 Our client has no concerns in respect of the Plan's compliance in this regard and feel that it is for the Council to answer this point in further detail.

bartonwillmore.co.uk

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
PROJECT MANAGEMENT
& COST CONSULTANCY
ENVIRONMENTAL
& SUSTAINABILITY ASSESSMENT
GRAPHIC DESIGN
PUBLIC ENGAGEMENT
RESEARCH

All Barton Willmore
stationery is
produced using recycled
or FSC paper and
vegetable oil based inks