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**VALE OF WHITE HORSE LOCAL PLAN 2031  
(Part 1 Strategic Sites and Policies)**

**EXAMINATION**

**STAGE 1 - MATTERS AND QUESTIONS**

Matter 3 – Spatial Strategy and Housing Supply Ring Fence

**Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3 and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?**

1. My clients generally support the approach taken in the settlement hierarchy and take the view that it is logical and sustainable for larger settlements (and settlements close to Towns and Local Service Centres) to accommodate more housing than smaller more remote settlements. It is also right that settlements cannot be considered entirely in isolation. The relative sustainability of locations for employment and housing are related as much to their proximity to other large settlements, as to the facilities within the particular settlements themselves. Therefore, the proximity of settlements to identified market towns and local service centres is important and generally the hierarchy reflects this in terms the allocations which result and which I support.
2. There are some significant exceptions which render the plan unsound with respect to the unsustainability of a number of the proposed locations for growth. In particular the release of housing land within the greenbelt appears unjustified and unnecessary in the context of other available land in less sensitive locations near to highly sustainable settlements.
3. Equally, the release of land within the Area of Outstanding Natural Beauty, is

fundamentally unjustified and unacceptable and profoundly unsustainable. The release of land within the AONB adjacent to major employment sites appears based upon the naive and unjustified assumption that building houses next door to a business park will result in the future residents working in the business park. This is unrealistic and unsupported by any robust evidence. The location of new housing within the AONB should be done only as a **last resort** in the absence of alternatives. It is quite clear that within the Vale of White Horse, there are other alternatives and locations close to and on the edge of major sustainable settlements (such as Shrivenham, East Challow and Wantage) which can accommodate new housing in a satisfactory and sustainable manner and which will enable full use to be made of public transport and alternatives to the private car.

4. In contrast to this, developing within the AONB in a location quite separate from existing major settlements does not maximise or enhance opportunities for sustainable transport or the creation of communities associated with existing settlements. The scale of development proposed in the AONB may be excessive but it is not adequate to generate or create a new 'place' with its own sense of identity as a distinct sustainable community.
5. It is genuinely bad and unsustainable planning and renders the plan unsound. Proposing such developments, in relatively remote locations away from existing major settlements or service centres and in AONB is unjustified and it is ineffective in achieving sustainable development, and contrary to national policy for the protection of this protected landscape.

**Is it feasible that a significantly different distribution of housing development from that proposed could be delivered?**

6. I represent the landowners of combined site area of approximately 2000 hectares which offers the genuine prospect of the creation of a new settlement within the heart of Science Vale Oxford close to the A 34 and adjacent to the Paddington main line. It is feasible, in the medium to long-term, for a new settlement provisionally described as Oxford Garden City, to provide a genuine solution to major housing delivery in central Oxfordshire.
7. Submissions have been made to the Local Plan in respect of this high-level strategic concept and some engagement has taken place. However, the approach taken by the Council in the consideration of this alternative strategy has been essentially negative. A new settlement requires cooperative working between a whole host of different agencies, local authorities, government organisations and other stakeholders and can only happen where there is a positive and constructive attitude from a key local authority. In this case senior politicians within the Vale of White Horse, and a single senior planning officer, have been prepared to discuss the proposal on several occasions but no stage has any positive effort been made to engage and to discuss constructively how it might be progressed.

8. It is my view that being asked to prove the case and to 'demonstrate technical deliverability' in relation to a prospective new settlement does not qualify as a positive attitude towards its potential eventual delivery. For this reason, it is my firm view that the plan as it stands is unsound because it was not positively prepared in respect to an open-minded and constructive approach to an alternative overall strategy. The strategy was decided and alternatives approached were considered in a wholly negative light for fear of undermining that strategy.
9. The current approach to housing delivery, dispersed across settlements, is clearly necessary in order to accommodate adequate five year land supply in the short term. However, this short-term approach, whilst justified in respect of early housing delivery has obscured and prevented long-term strategic thinking, which could conceivably deal with more major housing issues across neighbouring authorities and Oxfordshire as a whole.
10. This local plan examination is not intended to consider regional or strategic issues beyond the boundaries of the Vale of White horse (other than those arising directly from the duty to cooperate) but it could and should be a catalyst for requiring a district council to think beyond its boundaries in the delivery of housing over the longer term. Therefore whilst a significantly different distribution of housing is unfeasible over the next five years, it is a genuinely advantageous prospect over the next 10 to 20 years because prosperity, housing growth and economic development go hand-in-hand with infrastructure delivery and this must be planned strategically for the long term.
11. If new settlements are to be part of the solution of the housing problems facing the United Kingdom in the south-east, in particular, there are few unconstrained sites available in the most pressured and economically important locations. The Vale of White Horse is limited by greenbelt to the north and AONB to the south and this is a problem faced by all the Oxfordshire authorities to a greater or lesser degree and West Berks is similarly constrained. Therefore the continued dispersal of housing across existing settlements will eventually act to undermine the quality of life within the settlements and to overburden inadequate infrastructure across a wide area. A new settlement offers potential for genuine strategic resource allocation in the delivery of infrastructure and the provision of housing where it is most needed in association with growth points such as Science Vale Oxford and the engine of economic growth, which is Oxford City.
12. The progress of this local plan should therefore be delayed to enable it to take into account the consequences of Oxford's City's housing need and to investigate seriously and constructively in a positive way, whether a new settlement has a role to play in accommodating that unmet need (whether in part or in its entirety) and to investigate what infrastructure could be delivered through the provision of a new settlement and to talk to the relevant governmental organisations who would inevitably need to be involved in such a major project.

This would genuinely be a positive approach to plan making and it would not undermine the necessary dispersed option currently proposed to deliver the five year land supply. But it would represent long-term strategic thinking for the benefit of the people, the economy and the environment of this district and its neighbours and it could be a major solution to the duty to cooperate between those neighbouring authorities.

**Is the “housing supply ring fence” approach of policy CP5 to the delivery of housing in the Science Vale area (a) adequately explained in terms of its practical operation, (b) justified, (c) likely to be effective and (d) in accordance with national policy?**

13. The housing supply ring fence identified areas which are currently the subject of very significant housing allocations. It does not relate to a distinct housing market area or even geographical location. It simply relates to areas where the District Council has identified major allocations. There are four separate areas identified on the plan and this policy simply demonstrates the council’s lack of confidence that the allocations within these areas can actually be delivered in a timely manner.
14. The ring fence is an attempt to protect the district from the consequences of the failure to deliver housing in these locations. It is an artificial means of insulating the council from the consequences of its actions in the event that the forecast housing is not delivered within these areas.
15. It cannot be a coincidence that one of the major areas is within the North Wessex Downs AONB, which in my view should not be allocated the development. One of the ring fence zones includes the entirety of Wantage and Grove, including the Grove Airfield scheme, which has yet to deliver any housing after 15 years as an allocated site. It is my belief that these ring fenced zones are a crude and arbitrary attempt to use planning policies to accommodate a possible failure to deliver the five year land supply necessary under the NPPF.
16. The ring fenced areas identify some sustainable locations such as Milton and Wantage but they include the highly unsustainable concept of building within the AONB away from any major settlement but close to Harwell Oxford. There is nothing in common between the four ring fence zones other than housing allocations of dubious deliverability.
17. For these reasons the housing supply ring fence areas are not justified and they’re not consistent with national policy. It is not at all clear how these four ring fenced zones will be effective in promoting or assisting in housing delivery. It is a defensive policy, which seeks to separate these four zones, wholly artificially, from the rest of the district in terms of housing land supply requirements. There is nothing in the policy to suggest it will be effective in the primary goal of facilitating sustainable new development. Indeed, it is likely to have the reverse effect

because failure to deliver within these zones will not result in the corresponding pressure to provide houses elsewhere.

18. I have clients with land in sustainable locations which could come forward in the event that housing land supply was deficient, this will not happen if the five year land supply problem is artificially suppressed and hidden within this policy designed to accommodate failure of delivery.