

Examination in Public Statement Stage 1 - Matters and Questions

In respect of:
Matter 3 - Spatial Strategy and Housing Supply Ring Fence

At:
Land South of Harwell Oxford Campus

On behalf of:
Mr & Mrs Carlisle



1.0 Response

- 1.1. McLoughlin Planning is instructed by Mr and Mrs Carlisle (hereafter referred to as the respondents) to make written representations to the Vale of White Horse Local Plan Examination in respect of their land interests at Harwell Campus
- 1.2. This document sets out the respondents' position in respect of the Stage 1 questions posed by the Inspector for Matter 3, Questions 3.1 and 3.4 only.

Question 3.1 (a) Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based?

- 1.3. The respondents support the identification of Harwell Campus within the Settlement Hierarchy. However, given its characteristics, it is a special case in the District and cannot be viewed as a conventional large settlement. The respondents consider that the distribution in CP4 is not soundly based in respect of the Campus for the reasons set out below.

Positively Prepared

- 1.4. The respondents' concerns regarding the test of being positively prepared relate to the fact that Policy CP4 does not appear to meet the aspirations imposed on the area within the SHMA and Plan itself as a key growth area. This is further compounded through the constant highlighting of the Campus and the Plan's reliance on it as a significant employment location. It is identified as one of five key housing locations, and yet there is not the proportionate level of housing growth being delivered to commensurate with its status.
- 1.5. Furthermore there is an unresolved question regarding the amount of additional housing that the Council will need to deliver to support Oxford City in meeting their OAN. The Cabinet report of 7 August 2015, followed by the Scrutiny Committee meeting clearly shows that whilst the Plan is grappling with the issue of housing supply in the District and accommodating a proportion of Oxford's unmet needs, the Plan does not go far enough to make the decisions required as to where development will be provided.
- 1.6. The Plan does not justify that it will deliver the housing in the correct locations, in accordance with Document HOU2 *Science Vale Housing and Employment Study*, approximately 11,850 new dwellings should be delivered in the Science Vale.

Justified

- 1.7. The evidence base has assessed the suitability of the strategy and the distribution of housing. A number of scenarios were put forward as part of the Issues and Options stage, with the preferred being set out in the Preferred Options Consultation in 2009



(Core Document TOP02 section 3). These were followed by internal reviews within the Council due to the revised evidence base and the increased need for housing. This revised housing need and distribution has been subject to a number of public consultations since 2013 that have justified the need and locations of allocations.

Effective

- 1.8. In order for the distribution strategy to be sound, it has to be effective and this means that allocations have to be deliverable. Given that Policy CP6 is expecting to deliver 129 hectares of employment land at Harwell Campus, the delivery of housing within close proximity to it, is not proportionate. A greater proportion of houses should be delivered where there is no requirement for workers to have to commute to work, i.e. a even delivery of employment and housing adjacent to each other.
- 1.9. The housing need scenario taken from the SHMA has been prepared jointly and is a cross boundary strategic issue. However, due to the need for the Council to have to accommodate some of Oxford City's housing need, the Plan cannot be effective in ensuring that this strategic requirement is fully addressed until the extent of the additional housing within the District is fully understood.

In particular: (a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3)...

- 1.10. The respondents' position is that the proposed distribution of housing set out in Policy CP4 does not reflect the settlement hierarchy in that it does not proportionately deliver the housing in locations where it will support the economic job growth anticipated. As CP3 only identifies Harwell Campus as a Large Village, it is not promoting the area as the key delivery site as set out elsewhere within the plan. The Plan should either promote Harwell Campus to a Local Service Centre or create a new category, this is based on the strategic importance of the Campus, the expected growth. Policy CP4 seeks to deliver 3,350 new homes around Valley Park, and only 1,400 around Harwell Campus, whereas, policy CP6 continues the delivery of 28 hectares of employment land at Milton Park and 129 hectares at Harwell Campus. Policy CP6 also promotes mixed-use development, and this unbalance of housing directed towards Harwell does not meet this approach.

...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,

- 1.11. The proposed distribution of housing does not meet this core principle and it is considered that the Plan misses a significant opportunity to make the "fullest possible use" of paragraph 17 in respect of development in the Science Vale and in particular, at the Campus. In conjunction with the representations already submitted on the



Plan, the respondents site is well located to benefit from footpath and cycle links to the Campus.

- 1.12. Based on the expected levels of employment growth at Harwell Campus, a significant number of workers will be required to commute from elsewhere, either within the District or from elsewhere. The A34 corridor is a significant advantage for the Campus and the improvements to it will certainly assist in improving accessibility as a public transport corridor linking the Campus to Abingdon and Oxford City. In terms of making the fullest use of walking and cycling. As highlighted, the proposed distribution has not considered all land around the Campus within the evidence base to fully understand the development impacts.
- 1.13. Paragraph 52 of the NPPF highlights the advantages of delivering larger scale developments. In doing so around Harwell Campus will enable the delivery of additional services and facilities to support a greater range of services than just meeting the day-to-day needs of residents.

...and focus significant development in locations which are or can be made sustainable?

- 1.14. By directing additional development to the Campus it will provide a better balance of land uses between employment and residential uses. It will also reduce the need for commuting to the Campus and build on the existing facilities which are already available in the vicinity of the Campus.

Question 3.4 - 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.

- 1.15. The respondents support the concept of ring-fencing housing supply in the district in the Science Vale area. The presence of a ring-fence is a common feature of development plans and can assist in securing sustainable patterns of development by ensuring that development is directed to the right locations in accordance with paragraph 002 of the Local Plan guidance in the PPG.
- 1.16. In terms of the practical operation of the ring-fence, there is the concern as to exactly what this means in terms of housing land supply. Currently, the Vale has a serious undersupply of housing land across the whole district and this could lead to instances where applications elsewhere in the District are being predicated on the lack of delivery from housing sites in the Science Vale Area. Further clarification will be required as to what the impact will be on the Vale's management of speculative housing applications.



- 1.17. In terms of whether the ring fence is likely to be effective, as set out above, ring fencing supply is commonly practiced in other LPAs and their adopted Local Plans, the most recent of which is the Wiltshire Core Strategy, which adopts a similar approach. Appeal decisions in Wiltshire have based 5-year supply arguments on the ring-fenced housing market areas, which form the primary level of distributing housing across a large administrative area. There is no reason to expect that the same could not operate here.
- 1.18. In terms of whether it is in accordance with national policy, the one concern is that the policy seeks to provide 11,850 homes across the ring-fenced area. However, Policy CP4 only makes allocations for 10,320 and there is no breakdown as to what are the existing commitments in the Science Vale area. It remains to be seen as to whether the policy is consistent with national policy as it does not appear to meet the OAN for this area.



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