

VALE OF THE WHITE HORSE LOCAL PLAN EXAMINATION MATTER 3 – SPATIAL STRATEGY AND HOUSING SUPPLY RING FENCE

3.1 Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based? In particular:

(a) 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?

It is arguable whether sustainability is promoted by concentrating the majority of development at the strategic allocations of the Science Vale area. If this is achieved at the expense of the sustainability of other areas and the rural villages then this will allow rural areas to atrophy. The Core Planning Principles of the NPPF recognise the need to support thriving communities within the countryside. Paragraph 55 of the NPPF expands upon this point.

(b) Does the distribution appropriately reflect the role of Oxford in providing for employment and services for the residents of Vale of White Horse?

In part yes. Housing development within the Science Vale, especially near Didcot will provide homes for those working in Oxford. However, an expansion of Abingdon and Botley (which is identified as a local service centre although it has no housing allocation – see page 48) plus other settlements in the Oxford Fringe would also assist.

It is unclear from the plan whether the expansion of these settlements is something that is related to the need for a Green Belt review, which in turn is related to addressing the Oxford City problem.

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

Yes. The HBF generally avoids commenting on the specifics of a spatial strategy but we will make a general comment here simply to point out that there are alternative options available. The local plan needs to provide for these alternative options in case the preferred strategy of concentrating growth in the ring-fenced areas of the Science Vale fails, or occurs at a slower pace than had been hoped.

For example, it would be perfectly reasonable in planning terms to allow Abingdon-on-Thames to grow by providing more than the 1,000 homes allocated in the plan, albeit this would probably need to be allied to a review of the Green Belt. As the local plan acknowledges, the Abingdon and Oxford Fringe area has strong links to Oxford City. It is therefore one of the possible, and more sustainable, options available to

the Oxfordshire authorities to allow Oxford City to grow as well as providing for a potentially larger element of the Vale's OAN. This is not to detract from the Council's legitimate desire to focus on the Science Vale as the primary location of growth. However we have some concerns about the over-reliance on this geographic area to provide all the homes required by 2031.

We also consider that it would be perfectly reasonable and in keeping with the aims of the NPPF to allow for some more, but more limited, housing growth in the Western Vale to help sustain rural life. We consider that the 1,650 homes earmarked for this geographic area, as set out in Core Policy 4, is too few, especially as this area contains the market town of Faringdon which could provide a hub for increased levels of growth (above the 550 earmarked, see page 87).

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;

Core Policy 5 is unclear in terms of how it will be applied. Figure 4.3 shows that there are four ring-fenced areas marked in red within the wider Science Vale geographic area. It is unclear whether the four red ring-fenced areas will have the separate housing requirement or whether it is the Science Vale area that will have the separate housing requirement. If the four ring-fence areas have a separate housing requirement does this mean that the rest of the Science Vale area will have its own housing requirement? This is hard to follow since the local plan at paragraph 4.22 says that the rural parts of the Science Vale area are 'intentionally' excluded. Does this mean that the VWH Council proposes to maintain three separate housing land trajectories and five year land supply calculations for:

- i) the four ring-fenced areas marked in red in figure 4.3 within the Science Vale;
- ii) the rest of the Science Vale (where potential new supply is heavily restricted); and
- iii) the rest of the district outside of the Science Vale?

However, we note that the *Topic Paper 4: Housing* only has a trajectory for the district as a whole although in its five year housing land supply calculation does divide the district between the 'Science Vale' and the 'Rest of the District'. The situation is not clear.

Secondly, it is unclear how this approach will operate in practice. The Council will need to clearly explain how it will deal with an undersupply in any one of these three areas. By treating the ring-fence as a discrete planning area, where the supply of homes is necessary to support the employment objectives, we assume that if completions are better than the rate anticipated by the trajectory then this oversupply (relative to the trajectory) will not be counted towards the five year land supply outside of the Science Vale. Also it is unclear whether an undersupply in the ring-fenced areas marked in red in figure 4.3 can be made good in the rest of the Science Vale area (i.e. the rural parts). The wording in paragraph 4.22 of the plan suggests that it could not.

Needless to say we are very concerned about the potential for double counting. If two or effectively three planning areas are to be maintained then there will need to be separate five year land supply calculations for each with a strict separation between these so that any over-supply (relative to the trajectory) in one area cannot be counted towards the land supply calculation elsewhere.

In summary, the Council needs to clarify whether it intends to operate two (or three?) housing land supply areas, these being: the ring-fenced areas in red indicated in figure 4.3; the rest of the Science Vale area; and the rest of the district. If it is not, and the only ring-fence is for the four areas marked in red within the Science Vale area, then the local plan lacks flexibility. This would be negative plan-making since the Council is effectively saying that if the ring-fenced areas under-deliver then this Council is under no obligation to try and remedy the deficit by providing land for housing elsewhere.

(b) justified

The ring-fence is unjustified. It is too tightly drawn. Effectively it is a ring-fence of the strategic sites that the Council has identified to provide the housing requirement. It does not appear to be a ring-fence of the broader Science Vale geographic area. This is explained in paragraph 4.22 of the local plan. The effect of the ring-fence is to prevent alternative sites coming forward even if the strategic allocations stall. We do not think the policy is an especially positive one. While we acknowledge the planning benefits of concentrating development at these established settlements we do not agree that this necessarily aids 'sustainability' since it will detract from the ability of the larger and smaller villages outside of the ring-fence and outside of the Science Vale and South East Vale geographic areas from being able to have some new housing. This policy will contribute to sucking the life out of the rural villages.

(c) likely to be effective

It is unlikely to be effective as it is unclear how the ring-fence will operate in terms of development management decisions. The imprecision could result in delay and/or arbitrary and inconsistent interpretation of the policy. This would not accord with the NPPF (paragraphs 15, 17 and 154).

The ring-fence also lacks efficacy in a strategic sense. Over half of the housing requirement is to be provided in the ring-fenced areas (10,320 dwellings, page 39). Once completions, known commitments, part 2 allocations and windfalls are discounted then the majority of the future housing land supply will be in the ring-fence. The dependency on these areas delivering is considerable and there may be issues of temporary over-saturation in the local markets.

The key to sustaining housing delivery is to provide a wider array of sites and not to rely on a few strategic allocations. The Council must provide more sites, of different sizes, in a wider variety of locations throughout the district. Providing a clear steer in

the Part 1 plan as to how many homes will be provided by the larger and smaller villages in the Western Vale would assist greatly in sustaining delivery.

The ring-fence may act as a brake upon the delivery of the housing requirement if the rest of the district is placed 'off-limits'.

d) in accordance with national policy?

National policy refers to the need for plan-makers to illustrate the expected rate of housing delivery through a housing trajectory for the plan period and a housing implementation strategy describing how they will maintain delivery of a five year land supply (paragraph 47). National policy, therefore, does not explicitly say that a district cannot be broken down into discrete sub-areas each with its own housing trajectory and implementation strategy.

However, we think it is unwise for the Council to split the district into two (or is it three?) areas. The purpose of the discipline of the five year housing land supply is that it acts as a sanity-check on the realism and effectiveness of the Council's local plan strategy. Hopefully the Council's spatial strategy is realistic and there should be no problem with the ring-fenced areas within the Science Vale yielding the completions anticipated. However, plans very often don't always go to plan (as von Clausewitz famously observed) and the Council really needs to have an alternative strategy to ensure that its housing requirement can be delivered by 2031. The NPPF in paragraphs 14 and 17 requires local plans to have some flexibility. The operation of a ring-fence would militate against this. We are not sure it is in the best interests of the Council to use the ring-fence in such an inflexible way.

The Council should not rely on the Part 2 plan as its alternative strategy. As we have argued in Matter 1, this will come into effect too late to rectify problems with delivery. Furthermore, this does suggest that leaving the identification of land to accommodate 1,000 homes to the Part 2 Plan, or Neighbourhood Plans, or the Development Management process, is unjustified and could contribute to an even greater under-delivery of the housing element of the plan.

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