
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?

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

1. The City Council supports Plan objectives SO3 and SO8 which envisage growth being directed to the most sustainable locations in the district, reducing the need to travel, and promoting sustainable modes. We also note and support introductory paragraph 4.3 of the submitted Plan, which in respect of the Abingdon-on-Thames and Oxford Fringe, recognises strong linkages with the City of Oxford.
2. Against this context, it is therefore surprising that Oxford is not further recognised in Policy CP3 as a sustainable settlement in respect of Vale's growth requirements, despite the fact that this sub-area abuts the City boundary and benefits from good public transport links into the City. Moreover, as identified in the question, the NPPF paragraph 17 requires that development is focused in the most sustainable locations, in terms of minimising travel, especially by private car. This would include locating development close to the edge of Oxford to minimise the need to travel and car use.
3. The Oxfordshire SHMA 2014 (HOU01) identifies Oxford as being the predominant driver for much of the Oxfordshire Housing Market Area. Paragraphs 3.86 to 3.88 of the SHMA state:

"The detailed work on the ground highlights that the City of Oxford's economy drives much of the housing market across Oxfordshire. The city hosts a 'world class' university and in many respects this drives the sub-regional economy (and is an important component regional and national economic competitiveness) through the spin-off of science and technology companies, especially into the health sector..."

All of this combines with Oxford's rich cultural offer, close proximity to London and situation on the River Thames to make it a destination for international students, visiting professionals, visiting academics and tourists. This means that the City's local housing

market has many competing claims on it and is driven by households with high income and wealth together with a large student population.

Oxford is however not a large city, but population density is high and the city's institutions (universities colleges, schools hospitals, administration) occupy a great deal of the available space alongside retail and housing. Oxford's local housing market therefore extends well beyond the City's boundary."

4. Oxford is widely recognised as having excellent opportunities to travel by walking, cycling and public transport. It has one of the most well-developed and well-used bus networks of any urban area in the UK outside of the metropolitan areas. High-frequency City bus routes also extend to key areas outside of the City, for example to Abingdon, Kennington and Botley. Oxford also has a cycling modal share some nine times greater than the national average, and the proportion of car journeys to work is only a little over half of the County average, at 37% of total journeys including passengers (see Appendix 4).
5. Furthermore, Oxford provides some 120,000 jobs, which is 35% of the total jobs in Oxfordshire. This compares to some 50,000 jobs based in the Vale of White Horse (or 15% of the County total).¹ The Oxford Strategic Economic Plan (SEP) (ECO10) recognises Oxford as a *"unique and truly global brand, known the world over for its academic excellence and historic significance"*, and identified the city of Oxford as being one of three key areas for growth potential in population, employment and housing (along with Science Vale and Bicester). The Cambridge Economics report (ECO02) and SHMA anticipate job growth in Oxford (under the 'Committed Economic Growth' scenario) of over 24,000 in the period 2011-31, which is higher than for any other Oxfordshire district, and around 28% of all new jobs forecast for Oxfordshire. However the Oxford and Oxfordshire City Deal (not currently in Core Documents library, but to which all districts are signed up to,) notes that the universities and businesses in the knowledge economy identify housing as a significant barrier to the recruitment and retention of staff, and this extends across most employment grades.
6. The City is also the main hub in the County for shopping and leisure, as evidenced by the enormous investment (£0.5bn) going into expanding the Westgate shopping centre. This expansion will substantially increase the already significant retail offer and increase travel demand to the City.
7. Recent Census analysis (Appendix 5, page 5) also shows that an average of 10,800 journeys per day are made from the Vale into Oxford. This is around three times as many journeys to work to the second most popular destination not in Vale itself, South Oxfordshire. The figure also represents an increase of 430 journeys compared with 2001, indicating a trend towards more and more Vale residents having their workplace based in Oxford. Further Census analysis (see Appendix 4) shows that in 2011, 11% of all Oxford employees had their home in the Vale. In total, 46% of Oxford workers were

¹ 'Investing in Oxford's future: A Route Map (Oxford City Council) page 7
(<http://www.oxford.gov.uk/PageRender/decP/OxfordGrowthStrategy.htm>)

shown to live outside the City, of which 37% live in the other Oxfordshire districts including Vale.

8. The City Council does recognise that, Green Belt aside, there are some significant constraints to developing strategic sites in the Vale close to the edge of Oxford. The built-up area of Botley, which adjoins Oxford, is constrained to the north and south by sensitive landscapes that form an important part of Oxford's historic setting. Equally, significant expansion of Kennington is largely prevented by the railway and Flood Zone 3 to the east, and Bagley Woods ancient woodland to the west.
9. However pending the outcome of the jointly-commissioned Oxford Green Belt Study, the City Council considers that there is good opportunity to meet housing need for Oxford to the north of Abingdon. This area was identified in the Oxford Informal Green Belt Assessment² as having potential to provide housing whilst not unacceptably compromising the purpose and function of the Green Belt. The City Council supports in principle the allocation of a strategic site providing for a significant number of homes at this location, which is considered to be well-linked to Oxford by bus and within a reasonable cycling distance of some of Oxford's larger employment areas. Furthermore, it relates well to the County Council proposals set out in the consultation draft of LTP4 to develop high-quality Rapid Transit and Premium Bus Route public transport lines linking a new Lodge Hill Park and Ride site to the City centre and Eastern Arc & Northern Gateway employment areas. Therefore it meets the criteria of sustainable patterns of development and reducing the need to travel in the NPPF.
10. The fact that the housing proposed north of Abingdon is likely to have a stronger functional link with Oxford than the Vale suggests it is misplaced to count this housing need as exclusively meeting Vale's OAN, and not contributing also to the unmet housing needs of Oxford and the wider HMA. This underlines that the delaying and relegation of meeting equally pressing wider housing needs within the HMA, and particularly from Oxford, is not a sound approach. In effect, to the approach in the Plan precludes the North Abingdon site as a future spatial option for meeting some of Oxford's unmet need, potentially leaving only sites that are far less suitably-located to meeting Oxford's needs.
11. In respect of other strategic allocations in CP3 and CP4, there is a lack of evidence that the functional relationship with Oxford and commuting patterns have been fully taken into account. Rather, the Spatial Strategy and Sub-area Strategies focus on relationships between settlements and their rural hinterlands within the Vale administrative area, with very little consideration given to functional relationships with the City. This is a failing in respect to the effectiveness and therefore soundness of the Spatial Strategy, in terms of planning effectively across boundaries. It also belies a failure to test alternative strategies, for example testing a greater level of housing development north of Abingdon to provide for those working and using services in the City.

² 'An investigation into the potential to accommodate urban extensions in Oxford's Green Belt' (Oxford City Council, May 2014) (<http://www.oxford.gov.uk/PageRender/decP/OxfordGrowthStrategy.htm>)

12. There is no proper analysis presented to support the focus on smaller settlements over Oxford as a more sustainable alternative, as a more 'Oxford-focused' strategy has not been tested through options consultation or the SA. Given Oxford's position being the major urban area and biggest area for employment, then only 11% of all strategic allocations gives inadequate weight to Oxford's importance in terms of providing jobs and services.
13. There is also a wider issue with the way that the increase in strategic sites has been arrived at. Across the district, the housing distribution proposes a 'spreading' of development to relatively unsustainable village settlements that are highly car-dependent, and in some cases lack the infrastructure necessary to support the level of development. The City Council is concerned that the strategy is based too heavily on a 'spreading the burden' principle, and not enough on sound planning which adheres to the core principles of sustainability and deliverability that run through the NPPF. Successive previous applications of this strategy have cumulatively led to increased car journeys and chronic congestion on the strategic and local highway networks.
14. In reference to our responses on Matter 1 (Duty to Cooperate) and Matter 4 (Unmet housing needs), it should again be remembered that the outcome of the joint work on the Oxford unmet need may well require a significant change to the overall Vale spatial strategy, to reflect the wider needs of the HMA – this process cannot simply be seen as a 'bolt-on'. For example, if further strategic sites close to Oxford are identified (for example as a result of the joint Green Belt study or from the joint Assessment of Strategic Growth Options), it may be appropriate to combine these with meeting some of the Vale's housing needs more sustainably, which would have a knock-on impact on the number and scale of allocations further away. This would render the Vale spatial strategy out of date within a very short timescale.
15. The issues identified above, and in our previous representation at pre-submission (letter dated 13th December), demonstrate how a more meaningful engagement with the City Council and others under the Duty to Cooperate would have resulted in a more effective strategy. This underlines the need to suspend the examination, to allow better integration within the HMA i.e. combining a 'providing for Oxford's unmet need' strategy with a more sustainable spatial strategy for the Vale.

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

16. Yes. As outlined above, further strategic sites that are identified as suitable for allocation(s) to meet Oxford's unmet housing needs could prove more sustainable in terms of also meeting some of Vale's own OAN or employment needs. They are also likely to be more deliverable, due to the strength of the housing market in and immediately around Oxford. Therefore, it is feasible, and indeed likely, that an alternative distribution of housing could be delivered within the timescale required.

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?

17. Whilst the City Council queries whether ring-fencing or disaggregating housing supply is consistent with national policy, what is more of a concern for the City Council is that the ring-fencing approach proposed in CP5 does not appear to be consistent with the agreed joint SHMA work. There is no indication in the SHMA that the ring-fenced area including Wantage, Grove, Harwell, Milton, and adjoining Didcot, constitutes a distinct or identifiable HMA or sub-market (Table 1, Housing Sub-Markets within Oxfordshire, page 11 of HOU01). The City Council is also concerned that the practical operation of such a ring-fencing approach is not fully explained, hence it is questioned whether the approach would be effective.
18. The explanation provided in the Plan, is that it is focussing housing growth to align with economic growth and the Strategic Economic Plan and Knowledge Spine aspirations. However the Plan is internally inconsistent because it fails to recognise that these very same principles - aligning jobs and homes to minimise the need to travel, and being supported by appropriate infrastructure - also apply to making provision for un-met housing need from Oxford. The housing need for Oxford must be located around the edge of the City close to the economic growth areas that are identified in the Strategic Economic Plan and Knowledge Spine and City Deal agreements. If the un-met need were to be simply spread across the Vale, or located within the ring-fenced Science Vale area, then it would not support the economic growth locations in the City, it would not be meeting Oxford’s housing needs, and would exacerbate existing transport issues across the City and County.
19. On this basis, should the Inspector be minded to accept the ring-fencing approach to housing in the Science Vale area, then the City Council would request that the same approach be applied in meeting the Oxford un-met need in the Vale Local Plan. Such an approach should specifically relate meeting the Oxford unmet to a geographically defined area around (and in reasonable proximity to) Oxford. Any such ring-fenced housing target for Oxford needs should apply as an annualised housing target, and not be relegated to a later period in the Plan. Unlike the ring fence policy for Science Vale, this approach would be consistent with the sub-markets that the SHMA identifies within the Vale (SHMA Table 1, page 11).