



Stage 1 of the Examination Hearings

Hearing Statement

Matter 3: Spatial Strategy and Housing Supply Ring Fenced

On behalf of: Greenlight Developments (879102)

Tuesday 29th September 2015 (AM + PM)

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1. QUESTION 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?

- 1.1. These policies address the distribution of strategic sites. We have no comments to make on these, but the policy also addresses the locational requirements for sites to be allocated through Part 2 and neighbourhood plans. As made clear in our representations at the pre-submission stage, the reference to “exceptional circumstances” is both unnecessary and unsupported by national planning policy. Further, the focus on locational characteristics of proposed development (“adjacent, or well related, to the existing built up area of the settlement”) to the exclusion of all other matters that contribute to and allow an assessment of sustainability (as that is defined in the Framework) is contrary to national policy.

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

- 1.2. No comment.

2. QUESTION 3.2

It is feasible that a significantly different distribution of housing development from that proposed could be delivered?

2.1. No comment.

3. QUESTION 3.3

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?

- 1.1. No, for the reasons set out in earlier submissions and summarised below.
- 1.2. There is no specific reference in the actual policy as to whether or not the apportionments are non-transferable between the ‘ring-fence’ area for Science Vale and the rest of the District. The consequences of an approach that the apportionments are non-transferable is that the ‘ring-fence’ area has the potential to become somewhat of an ‘abyss’, where the Council can shift its housing need. Any non-delivery in that ‘abyss’ is then sealed, in the sense that the Council can disregard it when applying Paragraph 47 of the NPPF.
- 1.3. This approach is concerning, and becomes even more concerning if/when the ‘ring-fence’ area for Science Vale fails to deliver/perform to the required housing trajectories. This would mean that the OAHN for the District is not being delivered, but there is no mechanism for delivering this housing by alternative means, particularly if the policy approach in the Local Plan is that the apportionments are non-transferable between the ‘ring-fence’ area and the rest of the District. The net result is that this housing need is stuck in the ‘ring-fence’ area with no obligation on the Council to accommodate for any failure to maintain a five-year housing land supply in the District as a whole.
- 1.4. Such an approach clearly goes against one of the underlying aims of the NPPF under Paragraph 47 of significantly boosting the supply of housing, and by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years worth of housing against a District’s housing requirement with the appropriate additional buffer of 5% or 20%, whichever is applicable.

Word count excluding text in bold: 390