

VALE OF WHITE HORSE LOCAL PLAN 2031 EXAMINATION

MATTER 3: SPATIAL STRATEGY AND HOUSING SUPPLY RING FENCE.

SUBMISSION BY EAST HENDRED PARISH COUNCIL

(Including submissions made by Roger Turnbull).

August 2015.

Question 1. Is the housing and employment land distribution soundly based?

- a) does it reflect the settlement hierarchy in Policy CP3, and actively manage patterns of growth to make the fullest use of public transport, walking and cycling, in para 17 of the NPPF?**
- b) Does it reflect the role of Oxford in providing for employment and services for residents of The Vale?**

Q 2. Is it feasible that a significantly different housing distribution could be delivered?

Q. 3 Is the ring fence approach of Policy CP5,

- a) adequately explained,**
- b) justified,**
- c) likely to be effective,**
- d) in accordance with national policy?**

1. IS THE HOUSING AND EMPLOYMENT LAND DISTRIBUTION SOUNDLY BASED?

1.1 The Vale is a rural District with three small Market Towns, Grove and Botley, none of which are connected to the national rail network. Development is constrained by Green Belt in the north, AONB in the south and River Thames flood plain adjoining Abingdon and Didcot to the east, the latter having rail connections to London, Bristol and Birmingham.

1.2 In the 2011 Local Plan spatial strategy, page 13, “the Council concluded that locating most of the new development in the main settlements of Abingdon, Botley, Faringdon, Grove and Wantage, and limiting it elsewhere, is the most sustainable strategy.”

1.3 “As they already play an important role as service centres for the surrounding rural communities, and contain a wide range of shops, leisure, education, and other services. They are relatively accessible to most residents by means other than by car. Focusing development in these locations, rather than spreading it more widely, will:

- reduce the need to travel by car,
- enhance the viability and vitality of the towns,
- and protect the rural character of the District.”

1.4. Policy GS1 not only focused development in the five main settlements, but also west of Didcot (where 5,500 new dwellings were allocated in the Structure Plan). Small scale development was allowed within the built up areas of villages under Policies H11, H12, and H13. Policy GS2 restricted development outside built up areas of existing settlements to protect the quality and character of the countryside (much of it being Green Belt or AONB). Development at Harwell Campus is restricted by Policy E7 because it is not a sustainable location, and is sited within the AONB.

THE VALE LOCAL PLAN 2011

Table 8.2 made the following distribution of 5,750 dwellings 1996-2011:

- Main Settlements and Didcot	74% (4,926)
- 22 Larger Villages (not more than 15 dwellings)	18% (1,196)
19 Smaller Villages (not more than 4 dwellings)	5% (310)

1.5. This is similar to the South Oxfordshire Core Strategy spatial strategy which identifies the main settlements of Didcot, Wallingford, Henley and Thame. The remainder of the District is covered by a Rural Communities Policy CSR1, which allows allocations in Larger Villages, largely through Neighbourhood Plans, and infill and redevelopment in Larger & Smaller Villages of 2-6 dwellings, provided development respects the Green Belt and AONB. A Development Management Policies DPD sets out criteria for the housing in the 140 rural communities.

1.6. The Spatial Distribution strategy, accepted by the Inspector and adopted in 2011, provides for 11,500 dwellings, with 6,300 dwellings, ring fenced around Didcot, and 5,200 dwellings in the rest of the District, of which 1,154 dwellings are allocated in a Site Allocations DPD in Larger Villages.

Tables 7.2 & 7.3 of the South Oxfordshire Core Strategy show:

Didcot	55% (6,300 dwellings)
Market Towns	35% (4,033 dwellings)
13 Larger Villages	10% (sites for 1,154 dwellings allocated in a Sites Allocations DPD).

It has a Ring Fence policy around Didcot to focus development in the most sustainable location, and protect the character of the rural areas. Development in the villages can be restricted, where its 5 year land supply is met, and focused on development at Didcot, which does not have a 5 year land supply.

1.7. Policy CP3 of The Vale Local Plan 2031 omits any mention of Didcot in the Settlement Classifications, whilst allocating 3,350 dwellings on the edge of Didcot at Valley Park and land to the North West.

Didcot is planned to expand from 25,000 pop. to 50,000+ pop. by 2031, so is of sufficient size, with a wide range of facilities, to be included in the Settlement Hierarchy above the three Market Towns. This is based on:

DIDCOT HOUSING IN SOUTH OXFORDSHIRE

- 6,300 dwellings at Great Western Park and N.E. Didcot,
 - 3,600 extra dwellings at Didcot and beyond in Science Vale, in the emerging SODC Local Plan 2031,
 - **DIDCOT HOUSING IN THE VALE**
 - 4,450 dwellings subject to an outline application at Valley Park,
- Total =14,350 dwellings @ 2.4 persons p. household = 34,440 pop.

DOES POLICY CP3 COMPLY WITH NNPF Paragraph 17 on SUSTAINABLE DEVELOPMENT?

1.8. The Oct 2014 Oxford Strategic Growth Options High Level Review, by Turley, uses the 2001 Census Travel to Work data to assess where sustainable travel patterns exist in Oxfordshire.

2001 Census TRAVEL TO WORK PATTERNS IN OXFORDSHIRE

Per Cent	By Car	Train	Bus	Cycle	Walk	Work from Home
Oxford City	42	2	16	15	15	10
The Vale	66	2	5	7	8	12

2011 Census TRAVEL TO WORK PATTERNS IN OXFORDSHIRE

Per Cent	By Car	Train	Bus	Cycle	Walk	Work from Home
Oxford City	37	3	16	18	18	8
The Vale	67	2	6	6	9	9

1.19 It concludes that Oxford has a more sustainable travel pattern than the adjoining Districts, suggesting that development in and around the city (e.g. in urban extensions) will provide more sustainable travel patterns. Appendix 2 shows the location of Community Facilities adjoining the potential Growth Areas.

Appendix 3 provides a Transport Assessment of Site Options, by Peter Brett, which assesses the accessibility of site options to facilities other than by car.

1.20. In Oxford City, when comparing the 2001 Census with the 2011 Census, the city had more sustainable travel pattern than in 2001, with a significant reduction in the percentage of travel to work by car, and a significant increase in train, cycle and walking trips.

1.21. In The Vale, the District had a small increase in travel to work trips by car, and a small increase in bus, and walk trips, but fewer by cycle trips, compared to 2001.

1.22. With Government cuts, the County Council's budget for supporting rural bus services is being cut. In future, bus services are likely to focus on Express services between Oxford, Abingdon, Didcot, and Wantage, at the expense of rural bus services serving the villages.

1.23. The National Travel Survey (NTS) shows that for all home-based journeys in Oxford, c.45% of journeys are made by car, and that travel to work only relates to 23% of total trips.

This implies that the majority of social, educational, retail trips in Oxford are made other than by private car. This re-affirms the more sustainable travel patterns in larger settlements.

1.24. The Oxfordshire Growth Deal announced in July 2014 confirmed a transport package for Oxfordshire of £108m. Projects are focused on the larger settlements, e.g. Oxford, Didcot station car park, Science Vale Cycle improvements (£0.8m), and provisionally £35m for Oxford Science transit.

OXFORD GROWTH STRATEGY ACCESSIBILITY ASSESSMENT

1.25 Table 3.3 assessed the distances of site options to:

- Oxford City Centre (av. Distance 6.6 kms)
- Key employment land (av. Distance 3 kms)
- District Centre (av. Distance 2 kms)
- Supermarket (av. Distance 2 kms)
- Secondary School (av. Distance 2 kms).
- Frequency of train/bus services
- Facilities within 2 kms walk and 5 kms cycle
- (based on NTS data that these distances offer the most potential for walk and cycle trips).

1.26 The results of the assessment showed that N. Abingdon had the highest (worst) score for sustainability. The implications for The Vale are that Policy CP3 is not supported by credible evidence that its spatial strategy of 2,000+ additional dwellings in Villages in the Preferred Option G of the Sustainability Appraisal (SA) compared to Options A,B & 6 for 13,294 -14,308 dwellings is not the most sustainable option. It does not therefore meet the test in paragraph 17 of the NPPF.

1.27. The proposed amendment in this submission is that the following settlements should be changed in the Settlement Hierarchy:

PROPOSED AMENDMENTS TO POLICY CP3.

1. ADD Didcot as a Larger Town, above Abingdon, Wantage & Faringdon. Didcot should be defined as land east of the A34.
2. INCLUDE Grove within Wantage.
3. DELETE Harwell Campus, as it is a Science Park, not a village. (its recent housing is related to Chilton).
4. DELETE Milton Heights, as Stagecoach's submission says they cannot serve it, and it is not a village but ribbon development.
5. DELETE Rowstock as it comprises ribbon development along the A417 within the gap between Harwell and East Hendred. The 2011 Local Plan excludes ribbon development from its settlement hierarchy.

These amendments would have implications for the deletion of new dwelling allocations at Harwell Campus, (1,400 dwellings), Milton Heights (400 dwellings) and Rowstock.

2. DOES IT REFLECT THE ROLE OF OXFORD?

2.1 The City of Oxford submission argues that the Plan is not sufficiently focused on Oxford as the sub- regional centre.

2.2. Oxford is the southern end of the long established sub regional growth policy of the OXFORD- MILTON KEYNES- CAMBRIDGE GROWTH ARC in the Milton Keynes and East Midlands Sub Regional Strategy included in the RSS.

2.3 The Oxford Growth Strategy is located within the same Travel to Work Area and Strategic Housing Area as The Vale and its Science Vale Growth Strategy comprising 10,320 dwellings in South East Vale and 15,850 jobs in Science Vale.

2.4. As there is a premium in the sale price of houses in the villages around Didcot due to their rural location, the South Oxfordshire Core Strategy included a Ring Fence to prevent development being focused on the villages, rather than on the more sustainable location at Didcot.

2.5. It is reasonable to assume that The Vale's spatial strategy for development in the villages in South East Vale/Science Vale will also attract development to the villages surrounding Didcot, preventing the planned high rate of development at Didcot being achieved.

2.6. Similarly, The Vale's preferred spatial strategy, Option G, with greater emphasis on the villages in the South East Vale, is likely to prevent the implementation of a more sustainable pattern of development in the Oxford Growth Strategy. There is therefore a conflict between both the South Oxfordshire Core Strategy spatial strategy for Didcot, and the more sustainable pattern of development in the Oxford Growth Strategy and the preferred option in The Vale Local Plan 2031, which has not been identified in the SA.

The alternative options A, B, & D in the SA, would therefore:

- i) reduce the conflict with the South Oxfordshire spatial strategy for Didcot,
- ii) reduce the conflict with the more sustainable pattern of development in the Oxford Growth Strategy.

3. IS IT FEASIBLE TO DELIVER AN ALTERNATIVE DISTRIBUTION STRATEGY?

PROPOSED AMENDMENT TO POLICY CP4.

- 3.1. The suggested amendment to The Vale Local Plan Policy 4 is for Options A, B, & D to be reviewed, within a housing requirement of 13,294-14,308 dwellings, to determine, after public consultation, the preferred option.
- 3.2. The review of three options already assessed in the SA will allow consultation on a range of alternative options, based on an economic scenario. Consultation on alternative economic scenarios was not available in the submission version of The Vale Local Plan.
- 3.3. The emerging South Oxfordshire Local Plan has consulted on a range of 3,600-5,100 dwellings, plus 3,000 dwellings to meet the unmet need in Oxford, providing a choice of alternative options based on an economic scenario not included in The Vale Local Plan.

4. IS A RING FENCE APPROACH CLEARLY EXPLAINED, JUSTIFIED OR EFFECTIVE?

4.1 The Council argue that the ring fence approach will:

- i) ensure that jobs and housing are provided together, to achieve a sustainable pattern of development, and
- ii) supports the Science Vale focus in the Local Plan, and
- iii) help seek external funding.

4.2 The ring fence approach has no mechanism for ensuring that the rate of new housing will be matched by the growth in jobs. So it is not justified, nor will it be effective by ensuring that the rate of housing development will match new jobs.

4.3. The South Oxfordshire Core Strategy ring fence sought to ensure a sustainable pattern of development at Didcot, rather than in villages in the rural area. The Science Vale does not distinguish between development at Didcot and in the rural villages. Indeed, by including the rural village in Science Vale within the ring fence, it will encourage an unsustainable pattern of development, contrary to paragraph 17 of the NPPF.

4.4. The PPG states that the Local Plan should direct development to the most sustainable locations, and identify areas where development would not be appropriate. By including the AONB within the ring fence, Policy CP5 does not comply with NPPF, which specifically seeks to direct large scale development away from the AONB.

4.4. Science Vale originally comprised the employment allocations at Harwell Campus, Milton Park, Culham and Grove. Unplanned development proposals in the rural villages are already relying on the draft proposals for Science Vale to justify housing schemes outside their built up areas in the countryside.

PROPOSED AMENDMENT TO POLICY CP5.

4.5 The suggested remedy is for the Council to exercise its Duty To Cooperate with South Oxfordshire D.C, to include a complementary ring fence around Didcot, as in the South Oxfordshire Core Strategy, to achieve the common objective of focusing development in the more sustainable location at Didcot, and to protect the rural villages and AONB which adjoin Didcot.

4.6. This would still support the achievement of the objective for a sustainable pattern of development, the focus on the employment allocations at Harwell, Milton Park, Culham and Grove.

4.7 The Council's argument that a ring fence will help attract external funding is not clearly expressed, not properly justified or shown to be effective. It might attract external funding, or it might not. There is no certainty that it will. In the light of uncertain external funding for the additional infrastructure requirements associated with the preferred Option G for 20,00+ dwellings, the preferred spatial strategy carries the risk that essential infrastructure will not be delivered, creating an even more unsustainable pattern of development.

DOES POLICY CP5 CATER FOR THE “WHAT IF” SCENARIO?

Policy CP5 implies that a separate 5 year land supply will be monitored within Science Vale from the rest of the District. If the rate of development for 10,200 dwellings in Science Vale does not provide sufficient housing land to comply with the 5 year land supply, what certainty does the Plan provide as to what actions the Council will take?

They have a choice:

- i) Add a 20% buffer of additional housing land supply to help meet the shortfall, as required by the NPPF?
- ii) More allocations at Didcot and Wantage, which already is unable to meet its 5 year land supply?
- iii) More allocations in the Science Vale villages?

Neither of these alternatives will provide a more sustainable form of development than either the Oxford Growth Strategy, nor will they protect the rural villages or the AONB.

In addition, the Policy will prevent planned sustainable development outside Science Vale ring fence, because it will have a separate 5 year land supply.

It is concluded that Policy CP5 will create uncertainty, not protect the rural villages or AONB, not ensure a sustainable pattern of development, and could effect the Oxford Growth Strategy and South Oxfordshire's rate of development at Didcot.