

**MATTER 3 – SPATIAL STRATEGY
AND HOUSING SUPPLY RING FENCE**

**Barton Willmore
on behalf of the Kler Group**

Respondent reference: 873605

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Questions

- 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?**
- 3.1.1 Whilst it is considered that the general approach of Core Policy 4 to distributing the majority of growth within the South East Vale Sub-Area is sound, it is not considered that the distribution of housing appropriately reflects the settlement hierarchy identified at Core Policy 3.
- 3.1.2 The South East Vale Sub-Area is considered to be the most sustainable part of the District. It includes much of the District's existing employment provision, including the regionally important Science Vale area. Within the Science Vale, Harwell Campus and Milton Park were designated as an Enterprise Zone in 2011 and therefore benefit from simplified planning measures, further promoting employment opportunities in the South East Vale Sub-Area. In January 2014, the Oxfordshire City Deal announced plans for further simplified planning measures within the Science Vale area.

- 3.1.3 Given the regional economic importance of the Science Vale area, and the existing and proposed simplified planning measures, it is considered logical that the emerging Local Plan proposes that 70% of the District's job growth over the Plan Period will be located within the South East Vale Sub-Area (Paragraph 5.48).
- 3.1.4 Paragraph 17 of the National Planning Policy Framework (NPPF) requires the planning system to "*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the Country needs*".
- 3.1.5 In accordance with Paragraph 17 of the NPPF, it is considered appropriate for 75% of the District's housing growth to also be accommodated within the South East Vale Sub-Area. This is also in full accordance with Paragraph 14's presumption in favour of sustainable development, and Paragraph 34 of the NPPF, which requires new development to be located where it will minimise the need for travel.
- 3.1.6 Given the existing strong economic base within the South East Vale Sub-Area, and the regional measures in place to boost this further, it is considered that the proposal to direct the majority of the economic growth and housing growth to support this, to the South East Vale Sub-Area over the Plan Period is sound.
- 3.1.7 Notwithstanding the sound approach to directing the majority of the District's new growth to the South East Vale Sub-Area, it is not considered that the distribution of housing proposed at Core Policy 4 adequately reflects the settlement hierarchy established at Core Policy 3.
- 3.1.8 Core Policy 3 identifies one Market Town (Wantage), one Local Service Centre (Grove), Six Larger Villages and six Smaller Villages within the South East Vale Sub Area. Core Policy 4 identifies strategic allocations in four of the six Larger Villages (excluding Blewbury and East Hendred). Core Policy 15 identifies a residual housing requirement for 220 dwellings to be delivered within the South East Vale.

- 3.1.9 Larger Villages are identified as settlements with a more limited range of employment, services and facilities at Core Policy 3. The principle of development within Larger Villages is established through their identification as relatively sustainable settlements and the proposed strategic allocations identified at Core Policy 4. Paragraphs 28 and 55 of the NPPF confirm that economic growth in rural areas should be supported through a positive approach to delivering sustainable development, and that housing growth should be located where it will enhance or maintain the vitality of rural communities. In accordance with this, policies should not constrain the growth of identified sustainable rural settlements, such as Blewbury and East Hendred.
- 3.1.10 This approach to ensuring the vitality of rural communities is further supported by Figure 4.1 of the emerging Local Plan, which outlines three 'key strands' to delivering sustainable growth within the District, including "*promoting thriving rural villages and rural communities whilst safeguarding the countryside and village character*". It also confirms that in order to achieve this, development will be focussed "*within the rural areas to the Larger Villages thus helping to maintain their vitality and the sustainability of local services*". Whilst this approach is supported, it is not considered that the distribution of development proposed at Core Policy 4 is consistent with this objective, through its failure to identify the potential for growth at Blewbury and East Hendred, in order to maintain the vitality and sustainability of these identified sustainable Larger Villages.
- 3.1.11 Whilst it is acknowledged that Core Policy 4 makes provision for further non-strategic development to be delivered within Larger Villages through future parts of the Local Plan or Neighbourhood Plans, it is considered that the policy should be more explicit regarding the delivery of the additional 220 dwellings, as well as the need for the future growth of Larger Villages to ensure their continued sustainability, in particular Blewbury and East Hendred.
- 3.1.12 It is essential that this residual housing requirement is directed to the most sustainable settlements within the South East Vale, excluding those which are already accommodating growth through strategic allocations. This will ensure that the growth of other sustainable settlements within the Sub-Area are not unduly constrained. This should be acknowledged within Core Policy 4.

3.1.13 By not identifying any specific growth within Blewbury and East Hendred, the policy may be misinterpreted that no further growth is required within these settlements. It is suggested that provision is made within the policy to ensure that some of the residual housing requirement is directed to Blewbury and East Hendred by broadly identifying these Larger Villages as areas for growth through future parts of the Local Plan. This will ensure a more sustainable pattern of development is achieved, in full accordance with the settlement hierarchy and the guidance contained within the NPPF.

3.1.14 In accordance with the tests of soundness identified at Paragraph 182 of the NPPF, the spatial strategy proposed at Core Policy 4 should be assessed as follows:

- Positively Prepared – The spatial strategy set out at Core Policy 4 does not allow for the delivery of the District’s full objectively assessed development requirement. Whilst it is acknowledged that the residual housing need will be delivered through future parts of the Local Plan, it is considered that a more positive and sound approach would be to identify broad locations where this additional need should be met in order to deliver the full development requirements of the District.
- Justified – This is considered in further detail at Question 3.3 below, however, as a whole, the strategy to direct most of the District’s employment and housing growth to the South East Vale Sub-Area is considered to be the most appropriate strategy when considered against the alternatives. However, in terms of how development is distributed in accordance with the settlement hierarchy, it is considered that the current approach is not justified and that a more appropriate strategy would be to identify broad locations for the distribution of residual housing requirements in accordance with the settlement hierarchy to ensure that identified sustainable settlements are not unduly constrained, in accordance with Figure 4.1 of the emerging Local Plan.
- Effective – By not identifying a broad location for the residual housing requirement to be allocated through future parts of the Local Plan, the strategy is not considered to be fully deliverable.
- Consistent with National Policy – The approach to focusing the delivery of growth within the South East Vale Sub-Area is considered to be consistent with National Policy, as it will reduce the need for travel and ensure sustainable patterns of development. However, by not identifying a requirement for growth within some identified sustainable settlements, the spatial strategy is not considered to be consistent with the NPPF guidance in terms of supporting the vitality and sustainability of rural settlements and their associated services.

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

- 3.3.1 It is not considered to be feasible that a significantly different distribution of housing development from that proposed could be delivered.
- 3.3.2 In accordance with the tests of soundness outlined at Paragraph 182 of the NPPF, it is necessary to consider whether the proposed spatial strategy is justified and is the most appropriate strategy when considered against the alternatives.
- 3.3.3 When considered against the alternative of not locating the majority of the District's required economic and housing growth within the South East Vale Sub-Area, this is considered to be the most justified approach.
- 3.3.4 A significantly different distribution of housing development across the District would be likely to lead to unsustainable patterns of development and an increase in the need for people to travel. The majority of the District's existing employment land is located within the South East Vale Sub-Area and regional measures are in place to introduce additional simplified planning measures beyond those which currently exist at Harwell Campus and Milton Park. Locating the majority of new housing development within other parts of the District would not encourage sustainable patterns of development, nor minimise the need to travel, in accordance with Paragraph 34 of the NPPF.

Summary

Whilst the spatial strategy set out at Core Policy 4 of the emerging Vale of White Horse District Local Plan Part One is supported and considered to be sound in terms of its approach to directing the majority of growth within the South East Vale Sub-Area, it is considered that the proposed distribution of housing is not in full accordance with the settlement hierarchy identified at Core Policy 3 and is therefore not sound.

Blewbury and East Hendred are identified as sustainable Larger Villages which are currently being constrained by Core Policy 4 as they are not identified for growth through Part One of the Local Plan. There is a residual housing requirement for the South East Vale Sub Area to be met through future parts of the Local Plan, however, in order to ensure that all Larger Villages continue to remain sustainable, it is essential that Core Policy 4 identifies broad locations for meeting the residual housing requirement, within Larger Villages such as Blewbury and East Hendred, which do not currently have strategic allocations.

This approach will ensure that the spatial strategy for the District is in full accordance with the settlement hierarchy and the NPPF and is therefore sound.