



**MATTER 3 – Spatial Strategy and Housing Supply Ring Fence**

**Vale of White Horse Local Plan 2031: Part1 - Examination**

**WRITTEN STATEMENT on behalf of Arnold White Estates Ltd**

<b>Project reference</b>	GP 006	<b>Date</b>	5 August 2015
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## 1.0 INTRODUCTION

- 1.1 This is a **Statement** submitted to the Inspector holding the Part 1 Examination of the Vale of White Horse **Local Plan 2031 (LP)** in September 2015. It is submitted by Gardner Planning Ltd (**GPL**) on behalf of Arnold White Estates Ltd (**AWEL**) which is a development promoter with land interests in The Vale of White Horse (**VWH**) **District**. GPL/AWEL made a detailed response to the Local Plan Publication Version in December 2014.
- 1.2 This Statement responds to the Inspector's initial questions in order to inform the Examination and as a starting point to the round-table hearing session

## 2.0 MATTER 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?***

- 2.1 Before arriving at the Settlement Hierarchy, the Spatial Strategy on pages 33 and 34 (with a map on page 35) seeks to identify the key areas of growth to varying degrees. The 'Science Vale' (which is not actually identified on the map on page 35) seems to be within the 'South East Vale' between Wantage and Didcot. Apart from a bold statement "*promoting the Science Vale as a world-class location for science and technology-based enterprise and innovation*" there is little further explanation, justification, quantification or relationship with other factors (including sustainable transport and the constraints of the AONBs) for allocating 74% (10,320 of 13,960 Part 1 allocations) of new homes in this area. The 2014 GLH Report<sup>1</sup> arrives at a figure of additional jobs of 15,850 for the VWH Science Vale principally because of the availability of Local Plan 2011 allocated land at Milton Park and Harwell Campus<sup>2</sup>.

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<sup>1</sup> Science Vale Housing and Employment Study South Oxfordshire District Council and VWH DC GLHearn October 2014 - not in Library

<sup>2</sup> LP Core Policy 6

- 2.2 The essential objective of macro spatial planning is not mentioned - to coordinate the VWH spatial strategy with the wider spatial strategy of Oxfordshire HMA and to serve the (unmet) needs of Oxford - bordering and to the north of the District. The LEP Strategic Economic Plan 2014<sup>3</sup> already begins that process. The identification of 'The Oxfordshire Knowledge Spine'<sup>4</sup> linking Oxford with Bicester to the north and the 'Science Vale' to the south, places Oxford in the centre and passes through the 'Abingdon on Thames and Oxford Fringe' sub-area of the District
- 2.3 Indeed the influence (and needs) of Oxford is not addressed in the Plan. The most logical area to do that, Abingdon-on-Thames and Oxford Fringe with its "*excellent public transport links to Oxford and beyond*"<sup>5</sup>, is to receive 14% of the housing growth - 1,990 of 13,960 homes, yet Oxford (as set out in other Matters) has an unmet need of some 18,000 homes.
- 2.4 So, before launching into the District-focussed hierarchy, the identification of sites and the apparently unsupported strategy of concentrating  $\frac{3}{4}$  of the growth in the south-east, the Spatial Strategy should have looked at the pressures, identified objectives and sought to produce a policy document which explained to the reader why it was doing what it is doing. This goes to the heart of why this Plan fails the Duty to Cooperate requirement. It is inward-looking yet in a dynamic and complex area with great potential (and consequently great pressures) where proper spatial planning does not respect administrative boundaries.

### 3.0 MATTER 3.3<sup>6</sup>

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

- 3.1 Firstly, analysis and justification for arriving at the spatial strategy needs to be much clearer, as already mentioned.
- 3.2 The constraints need greater examination. Obviously the whole ring around Oxford is Green Belt, but is it still relevant or desirable to contain Oxford and serve its needs by commuting into Oxford from further afield? The AONB to the south of the District may be a more physically

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<sup>3</sup> ECO10 LEP Strategic Economic Plan 2014

<sup>4</sup> *ibid* p vii

<sup>5</sup> Plan para 5.7 p52

<sup>6</sup> there is no matter 3.2

recognisable constraint. The Western Vale is relatively free of constraints but surely too remote from centres of established and growing need.

- 3.3 Transportation corridors, especially rail, have a profound influence on growth (as recognised in the Framework para 17 point 11). Fig 4.2 prominently shows the Didcot-Abingdon-Oxford line, but this seems to have had no influence on the spatial strategy.
- 3.4 It is therefore entirely feasible to have a different distribution of housing, in line with a properly thought through and fully explained spatial strategy. There is no evidence that it could not be delivered.

#### 4.0 MATTER 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?***

- 4.1 There seems to be no difference between the ‘ring fence’ for the Science Vale and the normal process of allocating land within the three sub-areas of the District. The Science Vale is mapped in the LP in Fig 4.3 p41, the ‘ring fence’ is shown as four locations within it (described as a “subset of the wider Science Vale geographical area”<sup>7</sup>) and locations which make this up are listed. There are no figures of housing allocations or listed sites for each of the four locations. The purpose seems to be to channel any (CIL or S106 or business rate) funds derived from housing within these 4 areas to Science Vale infrastructure and if housing does not take place within the ring fenced areas then growth prospects would be harmed<sup>8</sup>.
- 4.2 There is no attempt to suppress housing growth elsewhere (and this would not seem feasible) so how the ring fence area would be the focus for housing is not explained. In all, the concept is poorly explained and operationally opaque. There would seem to be nothing in the Framework or Guidance to support it.

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<sup>7</sup> LP para 4.22 p40

<sup>8</sup> LP para 4.20