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Vale of White Horse Local Plan Part 2

CPRE Oxfordshire Hearing Statement - MATTER 2 - Unmet Housing Need from Oxford

2.1 How has the 2,200 working assumption for unmet housing needs from Oxford within the Vale been arrived at and is it supported by proportionate evidence?

The Plan statement that the 2,200 house Oxford unmet need cannot be met within the City boundaries is unsound and has no reliable evidence base.

The 2,200 figure has no validity because it was determined by simple subtraction of the houses Oxford informally offered to build from the total SHMA allocation to the City, with the remainder arbitrarily allocated to the surrounding Districts (an allocation that neighbouring South Oxfordshire declined to accept, at least in full). In this process no evidence was provided by the City of its full capacity to accommodate its own needs nor, particularly, was any such capacity tested at an EIP. The 2,200 figure is all too correctly described in the Plan as being just a “working assumption”.

It is a purely arbitrary round figure allocation of an untested number and is no basis for sound planning.

CPRE has produced detailed evidence that, by employing higher densities (as LPAs are advised by Government to do), and using ring-fenced employment land to satisfy housing need rather than to ramp it up, the City could accommodate more than all its notional unmet need even on the SHMA basis. Furthermore, the new OAN (Objectively Assessed Need) formula halves Oxford’s overall housing need and thereby removes any “unmet need” entirely.

There will be no reliable evidence of unmet need, if any, until Oxford has submitted a plan to be tested. Any submission Oxford now makes should be tested on the new OAN numbers, not on the SHMA. The Vale should not progress a plan to meet Oxford’s unmet need until it has been properly evidenced and tested at EIP.

Finally since Oxford's emerging Plan states that providing accommodation for its own people is its most important objective and since it is patently more sustainable to use land efficiently to enable people to live and work in the same City, it would be unsound and unsustainable for the Vale to accept any figure for Oxford's unmet housing need without it having been shown that the housing could not be built within the City.

2.2 What are the arrangements for reviewing or updating this working assumption?

There have been ample opportunities to rework this assumption, on the basis of CPRE's numbers, and later on the new OAN figures. The opportunity should be taken now and the plan suspended whilst this occurs. For the future it is noted that long-term population forecasts have declined between the 2014 projections used as the basis for the published new OAN housing need projections and it may be as likely that these will decline further during the Plan years as to increase.

2.5 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site - Dalton Barracks) and sites outside the Green Belt the most appropriate?

CPRE would argue that it is hard to see a rationale for striking a balance between releasing Green Belt and other land, since Green belt can only be released where there are exceptional circumstances to do so and we see none here, even if the plan numbers were supportable.

The Dalton Barracks site is partly previously developed and can therefore be developed to the extent projected in the Plan whilst retaining Green Belt status. Neither the whole site, nor any part of it needs to be removed from the Green Belt and therefore there can be no exceptional circumstances to do so. More widely no release of Green Belt land can be considered unless the stages outlined in the White Paper and draft NPPF have been gone through and confirmed at an EIP.

As for the possible longer term development of the site referred to in the Plan, it will be recalled that a number of proposed Green Belt releases, where there was no credible plan for their use, but in case some future need arose, were struck out, on our submission, from LP1. To release Green Belt at Dalton when there is no need to do so is to repeat the same error.

2.7 To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?

Once the sites are released, reworking of the figures will not take them out of play. For that reason we believe the plan should be suspended until such time as the figures are reworked or confirmed.