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EXAMINATION IN PUBLIC OF

**Vale of White Horse Local Plan**

**Hearing Statement in respect of Hearing Session for Matter 1**

On behalf of Merton College Oxford

## **Matter 1: Duty to co-operate and other legal requirements**

**Q1.1: What are the strategic matters relevant to the LPP2 and which other authorities/organisations are affected?**

### **Strategic Matters**

- 1.1 A key strategic matter relevant to LPP2 is provision to meet Oxford's unmet housing need within the most appropriate locations in the District. The proposed provision in the publication version of the Local Plan is not considered the most appropriate strategy. As set out within submissions to earlier stages of Plan preparation, it is not considered that the Vale of White Horse have appropriately demonstrated capacity to deliver the required number of homes (2,200) to be delivered over the plan period to meet Oxford's unmet housing need.
- 1.2 With regard to the 2,200 homes figure, we consider that, whilst agreed with the Oxfordshire Growth Board (OGB), this figure is unlikely to be sufficient, in light of the severity of the housing shortage within Oxford and particularly having regard to potential issues such as the deliverability of the South Oxfordshire Local Plan and associated delays. The District may therefore seek to contribute further to responding to Oxford's unmet housing need, and do so as close to Oxford itself as possible. This is a key issue with the Plan, particularly noting the Local Plan Part 1 Inspector's comments (also highlighted with Topic Paper 2 – Site Selection) that "a substantial part of the OAN arises from demographic changes which points to a need for new housing in this part of the district as well as in the area of greatest employment growth. Moreover this part of the district is closer to Oxford City".
- 1.3 As currently drafted, the Local Plan would not deliver the unmet housing requirements for Oxford, defined as Oxford's unmet housing need, in the most sustainable way, and as close to Oxford itself as possible.
- 1.4 The methodology presented in the Publication Version of the Local Plan is unsound. Planning Practice Guidance provides advice on methodological approaches to assessing housing need. Need should be based on household projections applied to representative rates to the population projections published by the Office for National Statistics. Also, Paragraph 47 of the NPPF states that 'to boost significantly the supply of housing' LPAs should:
  - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
  - identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.
  - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

- 1.5 Based on the above, it is considered inappropriate to include 'housing completions' within the projected number of houses to be delivered. This serves to distort the actual existing deficit of housing in the area and misrepresent the contribution of the proposed allocated sites to meet housing needs. There is no clear and monitorable indication as to where the proposed 2,200 dwellings required would be delivered. It is considered that the LPP2 needs to demonstrate an ability to deliver two separate groups of dwellings, specifically 1) those that would serve the Vale of White Horse generally and 2) those that would serve to meet part of the unmet housing needs arising from Oxford.

#### **Other authorities/organisations**

- 1.6 It is not considered that the submitted plan demonstrates a sufficient level of co-operation with the neighbouring local authorities and local delivery partners. At present, the defined housing contribution to Oxford's unmet housing need is not set out as a separate, monitorable quantum of housing that also properly takes account of delivery of Oxford's unmet housing need and delivery across the other Oxfordshire authorities.
- 1.7 The NPPF states that the Plan should be deliverable over the course of the Plan period and based on **"effective joint working on cross-boundary strategic issues."**
- 1.8 The Draft Local Plan does not meet this requirement because there is not the evidence of genuine joint working on all matters with all stakeholders, resulting in it potentially not meeting Oxford's unmet housing need, and certainly in a way that is both transparent and capable of being monitored in terms of delivery for that specific housing need.

#### **Q 1.4: Overall, has the Council satisfactorily discharged its duty to co-operate to maximise the effectiveness of LPP2?**

- 1.9 We are concerned that the representations submitted to the Council on 4<sup>th</sup> May 2017 and subsequently on 22<sup>nd</sup> November 2017 in response to the Preferred Options and Publication Version of the Plan have not been properly or appropriately considered. The current proposed provision of housing to meet Oxford's unmet need remains opaque in respect of commitments to monitoring and engagement with other authorities in respect of this separate quantum of housing.
- 1.10 We highlight Cherwell District Council's submission Plan: 'Partial Review of Cherwell Local Plan 2011-2031 - Oxford's Unmet Housing Need' Section 5, Table 4 as a good example of setting out how the identified need would be met over the Plan period. Cherwell District Council clearly outline that they are to deliver 4,400 homes in the period 2021-2031 and support that with clear evidence of sites with capacity to deliver those

homes which are specifically to address Oxford's unmet need, and not any requirement arising within Cherwell District itself.

- 1.11 It is not considered that the Vale of White Horse have the required level of evidence to demonstrate site capacity to deliver the required number of homes (2,200) to be delivered over the plan period, as agreed through the Oxford Growth Board.