

Local Plan 2031 Part 2

Publication Version Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Patsy"/>	<input type="text"/>
Last Name	<input type="text" value="Dell"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Head of Planning, Sustainable Development & Regulatory Services"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text" value="Oxford City Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="St. Aldate's Chambers"/>	<input type="text"/>
Address Line 2	<input type="text" value="109-113 St. Aldates"/>	<input type="text"/>
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Postal Town	<input type="text" value="Oxford"/>	<input type="text"/>
Post Code	<input type="text" value="OX1 1DS"/>	<input type="text"/>
Telephone Number	<input type="text" value="01865 252190"/>	<input type="text"/>
Email Address	<input type="text" value="pdell@oxford.gov.uk"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Section2

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☒

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Section 2: Meeting Oxford's unmet need

Support: The City Council welcomes the amendment to provide for Oxford needs solely within the Abingdon & Oxford Fringe Sub-Area. It is also encouraging that development around north Abingdon is already advancing, such as the outline planning permission for 950 dwellings in North Abingdon.

Objection: However the City Council considers that it is vitally important that there is more-specific reference within the text of the Plan to clearly identify the preferred strategic sites to meet Oxford's unmet housing needs in order to avoid Oxford needs being met at less accessible locations within the sub-area. The City Council would also be keen to work with the district council on relevant master planning or pre-application matters, where a site is making provision for Oxford's housing needs.

Thank you for consulting Oxford City Council on Part 2 of your Local Plan. The City Council supports the commitment in the Plan by the Vale of White Horse Council to deliver the 2,200 homes agreed by the Oxford Growth Board as an appropriate apportionment for the Vale to help meet Oxford's housing need to 2031. This approach reflects the success of the joint working arrangements between the City Council and the Vale of White Horse. The proposed housing figures reflect the terms of the Memorandum of Understanding agreed at the Growth Board Meeting in September 2016. Since that time engagement between the two Councils has continued on a regular basis, reflecting the commitment of the Vale Council to

meeting the duty to co-operate with Oxford City Council.

The City Council is pleased that this latest version of the Plan has recognised the importance of spatial relevance, and connectivity to Oxford, as well as the need for generally sustainable locations, in addressing Oxford's unmet need. This has been addressed in the Plan by providing for at least 2,200 homes in the Abingdon-on-Thames and Oxford Fringe Sub Area. This will avoid homes designated to meet the city's needs in less accessible and less sustainable parts of the District.

While it would have been preferable for there to be specific site allocations in the Plan to meet Oxford's unmet housing need, the Plan does provide reassurance that there are sites within the sub-area that are "suitably close to and accessible to Oxford" and with a capacity which meets the 2,200 apportionment. This particularly applies to the major strategic sites at north Abingdon, and we would reiterate our specific request that those sites should be referenced as contributing to Oxford's unmet needs. We are stressing this point because, as we indicate above, it is important to minimise the risk that developments to meet Oxford's needs are claimed as being delivered at less accessible locations within the sub-area. There is also evidence to demonstrate that some of the sites in north Abingdon in particular are on track to deliver the apportionment in a timely manner, potentially even ahead of 2021.

(Continue on page 4 /expand box if necessary)

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Proposed modification: The text needs to be amended to make clear which strategic sites are being identified to meet Oxford's unmet housing need.

(Continue on page 4 /expand box if necessary)

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Signature:

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17th Nov 2107

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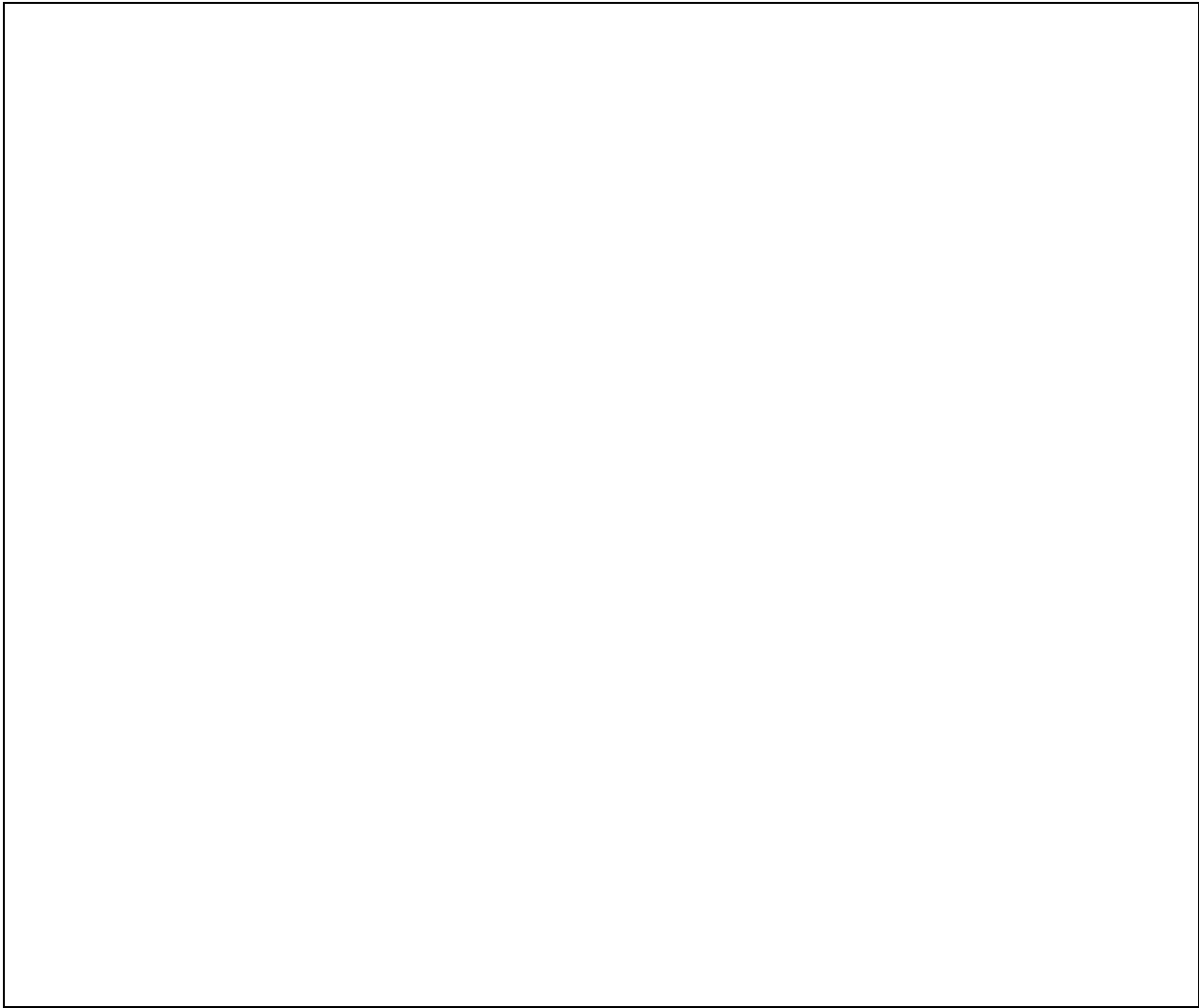
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Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph 2.5, 2.8,
2.14-16

Policy 4a, 8a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

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Section 2: Source of sites to meet Oxford's unmet need

Objection: The supporting text is unclear in places with regard to whether the sites to meet Oxford's unmet needs are contained in Part 1 or Part 2, and if there are strategic or additional sites. It is important that this should be clarified.

Paragraphs 2.5 states:

"...the Part 1 plan addresses housing need arising from the Vale of White Horse (20,560 homes). The Part 2 plan seeks to address the agreed quantum of unmet housing need for Oxford City to be met within the Vale, which has been identified as 2,200 homes"

Paragraph 2.8 states:

"The Part 2 plan therefore allocates additional housing sites to address the agreed quantum of unmet housing need for Oxford to be addressed within the Vale".

Paragraph 2.14 states:

"...the Vale's agreed quantum of unmet need for Oxford (2,200 dwellings) is allocated to this Sub-Area [Abingdon-on-Thames and Oxford Fringe] as set out by Core Policy 4a: Meeting Our Housing Needs.

Core Policy 4a includes the following additional text:

"The agreed quantum of unmet housing need for Oxford City to be addressed within the Vale of White Horse of 2,200 dwellings will be provided through either strategic or additional sites provided for within the Abingdon-on-Thames and Oxford Fringe Sub Area."

Paragraphs 2.15 states:

"The [Oxford's] unmet need is met by a combination of the Part 1 strategic allocations and Part 2 additional allocations.

Paragraph 2.16 states:

"... the Part 2 plan ensures that at least 2,200 additional dwellings are allocated with[in] the Abingdon-on-Thames and Oxford Fringe Sub Area; and that at least 2,200 dwellings are provide for on sites within this Sub Area that area suitably close to and accessible to Oxford (Table 2.1)."

Table 2.1 is a list of sites including Part 1 Plan and Part 2 plan sites in the Abingdon-on-Thames and Oxford Fringe Sub Area that are referenced as close to and accessible to Oxford.

(Continue on page 4 /expand box if necessary)

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Proposed Modification: A modification to the text is required to provide additional clarity to identify and cross-reference the proposed sites to help meet Oxford's unmet housing need. It is suggested that, at the very least, to avoid confusion, a cross reference to Table 2.1 should be made in Policy 4a (and Policy 8a) to ensure that it is clear which sites are being referred to, in the policy, that are close to and accessible to Oxford. In its current form, the plan is not effective as it not clear which sites are deliverable to support Oxford's unmet need within the Vale. The Plan should also contain a commitment from the Vale of White Horse to publish a housing trajectory to monitor delivery against the unmet housing need apportioned figure of 2,200.

(Continue on page 4 /expand box if necessary)

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☐

No, I do not wish to participate at the oral examination

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Yes, I wish to participate at the oral examination

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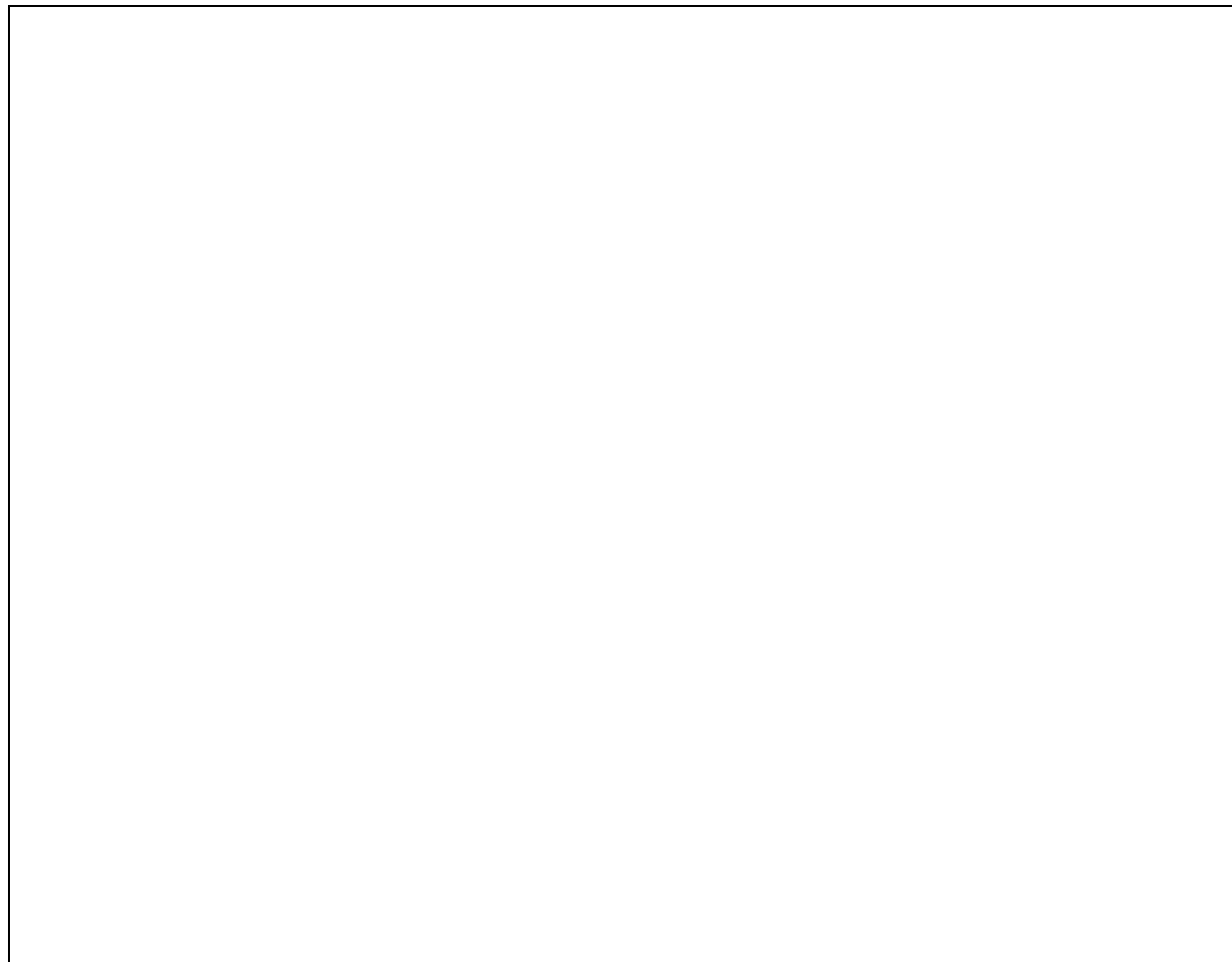
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X

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Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

☐

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Paragraphs 2.24-2.26: Affordable Housing for Oxford's Unmet Need

Objection: The absence of a clear confirmation that the proposed affordable housing can be provided in a timely way and in sustainable locations, near to Oxford, raises concerns about their delivery. The City Council therefore consider that there should be a formal agreement between the Vale of White Horse and the City Council as part of a memorandum of understanding or similar mechanism, setting out a clear process for the delivery of affordable housing that addresses Oxford's needs. This should include details on matters such as an allocations policy, tenure mix, unit size and eligibility.

The addition of paragraph 2.25, which sets out a commitment to the agreement of an approach between Vale and City housing policy officers, is welcomed.

Paragraph 2.26 makes reference to continuing "to work positively... to plan for housing for Oxfordshire in the longer term". Whilst this statement is supported, the phrase itself seems to suggest that the Vale is only looking to work positively in the longer term (emphasis added) whereas this joint work should begin immediately. It is suggested that this could be rephrased to reflect this, perhaps by replacing 'in the longer-term' with 'over the next 25-30 years', reflecting the work undertaken around the Oxfordshire Growth deal discussion and the recommendations from the national infrastructure commission relating to the Oxford to Cambridge Corridor.

There are sites coming forward in the Abingdon-on-Thames and Oxford Fringe Sub Area that already have planning permission or are live planning applications under consideration,

and that, according to Table 2.1 on page 23, are “close to and accessible to Oxford”. It is important for the City that arrangements on an allocations policy/nomination rights for affordable housing are agreed promptly between housing officers to ensure that those sites most-sustainably connected to Oxford within the Abingdon and Oxford Fringe Sub Area benefit Oxford’s residents in most need of housing. This should be secured by a formal agreement.

Para 2.26 states “*Until the updated Oxfordshire SHMA and Oxford City Local Plans are completed, it will not be possible to determine the precise affordable housing need for Oxford, to be provided for within the Vale of White Horse.*” This statement is incorrect. The Vale of White Horse Plan (and the apportionment of Oxford’s unmet housing need that are being provided for in the Vale) is based on the findings of the 2014 SHMA. As part of the evidence base for the 2014 SHMA, a figure of 50% affordable housing need for Oxford was used to calculate the housing need for Oxfordshire. Given that the Vale Plan uses the 2014 SHMA as part of its evidence base, it is not appropriate to suggest the need for delay in delivering an identified number of affordable homes for Oxford’s residents (as para. 2.26 suggests). The Vale’s apportionment to meet Oxford’s unmet housing needs is 2,200 dwellings and of these 1,100 dwellings should be affordable.

We would suggest that this paragraph of the plan is not “justified” – as there is credible and robust evidence available to support the delivery of affordable homes for Oxford which has not been reflected in the plan.

It is understood that the 35% affordable housing requirement overall in the Plan would deliver more affordable housing than required in the Vale of White Horse and that the excess would meet Oxford’s needs. Further explanation is required in the Plan as to how this approach will deliver the 1,100 affordable dwellings on the sites in the Abingdon and Oxford Fringe sub area (Paragraph 2.24); in other words how many affordable homes for Oxford might be expected from key sites in that sub-area, to see how close to the 1,100 it reaches. The delivery mechanism should also be clear. In the absence of this clarification the City Council would have to object on this matter since meeting affordable housing is such an important element of Oxford’s unmet need. It does appear that the amount of affordable housing would exceed the needs of the Vale of the White Horse however it is not clear how many units would be available to contribute to Oxford’s significant unmet affordable housing need. In addition no specific sites are identified to meet this unmet need. In these circumstances some further explanatory text and cross-reference to the relevant tables is required.

The Vale Local Plan part 1 provides that in “exceptional circumstances” options such as full off-site delivery and commuted sums would be considered. The City Council does not consider that these are acceptable solutions to dealing with affordable housing to meet Oxford’s unmet housing need. The City Council wish to be assured that the Plan will fully recognise the importance of spatial relevance, and connectivity to Oxford, as well as the need for generally sustainable locations, in addressing the affordable housing requirement of Oxford’s unmet need.

(Continue on page 4 /expand box if necessary)

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Proposed Modification:

It is suggested that para 2.26, is amended as follows:

~~"The Vale of White Horse District Council will continue to work positively with Oxford City Council and other Oxfordshire Authorities to plan for housing for Oxfordshire in the longer term. It is anticipated that this will include the preparation of an updated Strategic Housing Market Assessment (SHMA) for Oxfordshire. Until the updated Oxfordshire SHMA and Oxford City Local Plans are completed, it will not be possible to determine the precise affordable housing need for Oxford, to be provided for within the Vale of White Horse. The Vale of White Horse DC will enter into a formal agreement with Oxford City Council to ensure the delivery of affordable housing towards Oxford's unmet needs in a timely manner on suitable sites within the Abingdon-on-Thames and Oxford Fringe Sub Area."~~

Further details should also be provided on nomination rights and appropriate policies to promote a balanced mix of property types and sizes, which should either be referred to in the text as a commitment or subject to future discussion through an agreed Memorandum of Understanding between the City Council and the Vale of White Horse prior to Examination so there is a clear mechanism / process has been established.

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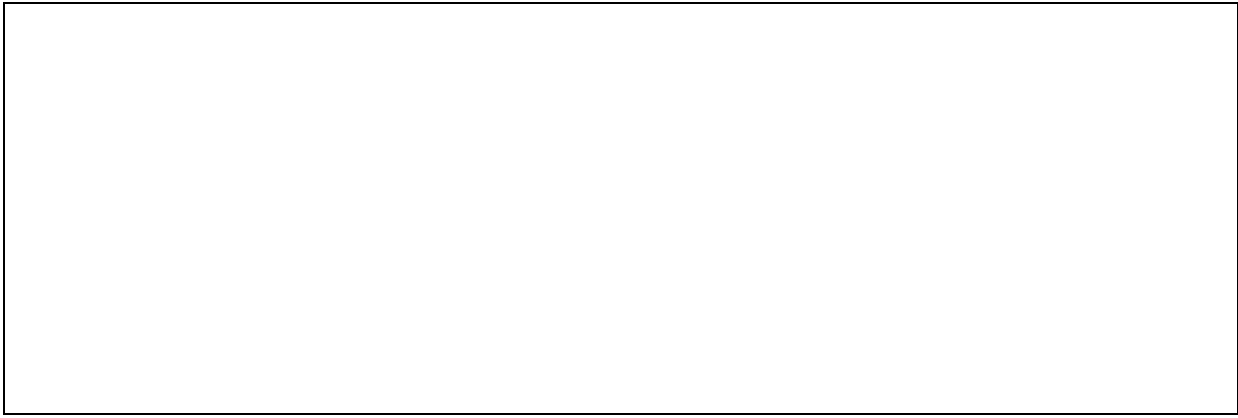
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Paragraph

2.53

Policy

Policies Map

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Paragraph 2.53: Dalton Barracks

Objection: The City Council do have some concerns about the timely delivery of this site and wish to be assured by an infrastructure and housing delivery plan can be provided to offer some reassurance on delivery. A commitment to undertake the Master Planning of this site within agreed timescales would represent a positive measure to help to bring this site forward at the earliest opportunity.

The City Council is pleased to see that following discussions with the Defence Infrastructure Organisation (DIO), the Vale have identified “an opportunity to release the site sooner than 2029” and that the Vale “is satisfied that 1,200 homes can be delivered on the site within the plan period up to 2031”. However, the City Council is concerned that the necessary infrastructure, while costed in the Infrastructure Development Plan (IDP), gives no indication of when in the plan period it would be likely to be provided. Such infrastructure to improve the connectivity of the site is vital if the site is to be considered for contributing towards Oxford unmet needs. The present road and public transport connections would not offer a sustainable location for those needing to access Oxford for work or other means.

The Infrastructure Delivery Plan provides some wording including “investigate” and “exploring” which may not be sufficiently robust to ensure delivery of the essential transport improvements to bring forward the Dalton Barracks site. This could result in less sustainable sites located in the Abingdon-on-Thames and Oxford Fringe Sub Area (e.g. East Hanney), providing homes for Oxford. There should be further clarity on the delivery rates at Dalton Barracks and infrastructure to address the relatively poor connectivity to Oxford; and

in the absence of these assurances the reliance on this site to deliver the apportionment would raise an issue of soundness.

There is also uncertainty as to whether the plan could deliver the number of houses being proposed by 2031, particularly if the site is not released before 2029. The Infrastructure Development Plan does not provide any convincing assurances that the necessary infrastructure can be funded and delivered at the appropriate time period to support the development. The delivery of housing is urgently needed to contribute towards meeting Oxford's unmet housing need, and the Growth Board agreement is to deliver the apportionment by 2031.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed modification: The City Council wish to see some amendments to the Plan to confirm details about the timely delivery of this site and wish to be assured that an infrastructure and housing delivery plan can be provided to offer some reassurance on delivery. A commitment to undertake the Master Planning of this site within agreed timescales would represent a positive measure to help to bring this site forward at the earliest opportunity.

The City Council consider that there needs to be a formal agreement on the strategic approach to the delivery of sites for meeting Oxford's unmet housing need, a trajectory for setting out its timely delivery to allow progress to be monitored and evidence of the infrastructure necessary to be provided to achieve it.

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

17th Nov 2107

Sharing your personal details

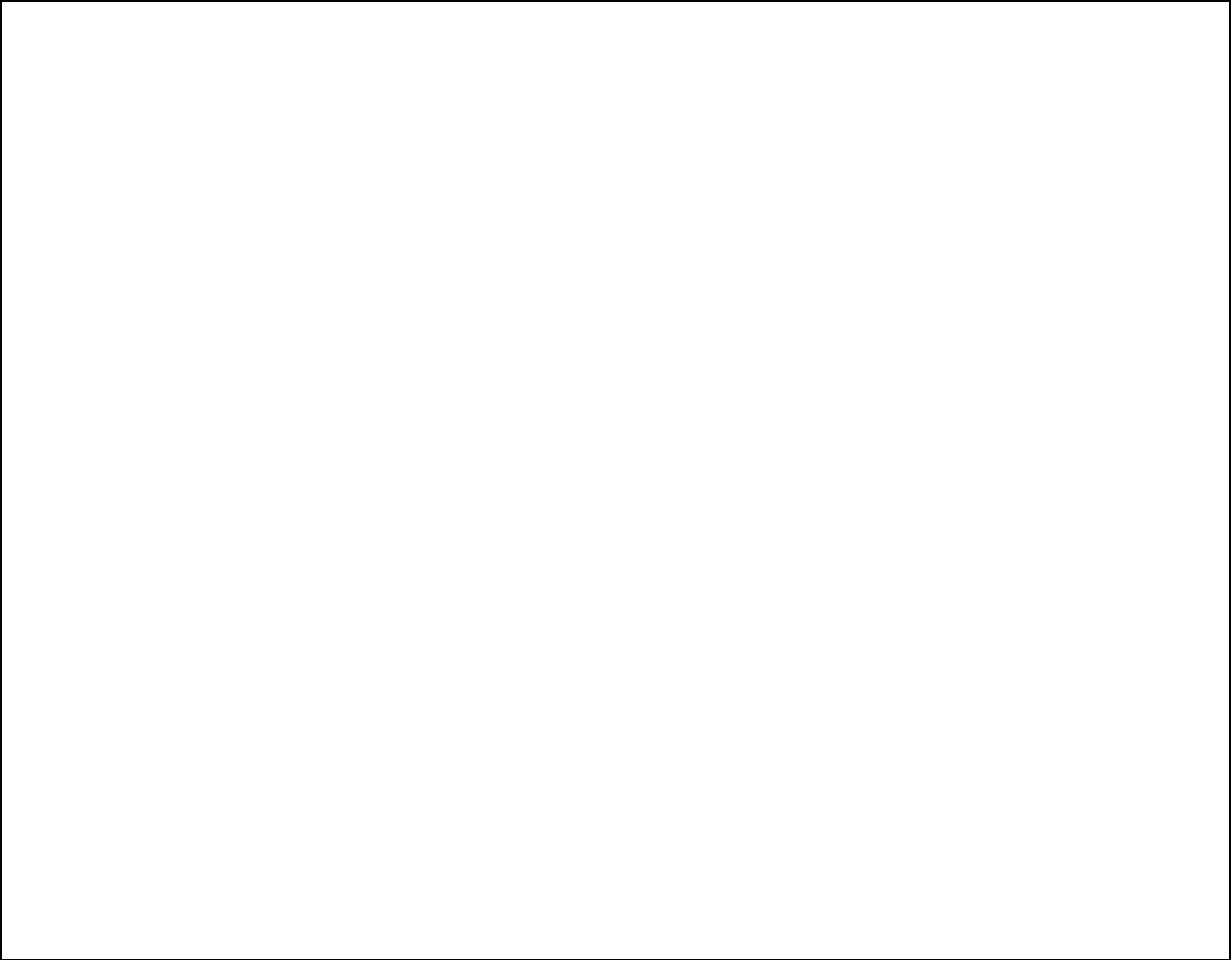
Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

- I would like to be kept informed about the progress of the Local Plan
- I would like to be added to the database to receive general planning updates
- Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**



Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

Local Plan 2031 Part 2

Publication Version Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Patsy"/>	<input type="text"/>
Last Name	<input type="text" value="Dell"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Head of Planning, Sustainable Development & Regulatory Services"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text" value="Oxford City Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="St. Aldates Chambers"/>	<input type="text"/>
Address Line 2	<input type="text" value="109-113 St Aldates"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="Oxford"/>	<input type="text"/>
Post Code	<input type="text" value="OX1 1DS"/>	<input type="text"/>
Telephone Number	<input type="text" value="01865 252190"/>	<input type="text"/>
Email Address	<input type="text" value="pdell@oxford.gov.uk"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation ✓

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

2.30 – 2.32

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

Paragraph 2.30-2.32: South East Vale Sub Area

Objection: The City Council consider that the South East Vale Sub Area as a location lacks the spatial relevance and connectivity to Oxford and does not offer a generally sustainable location to contribute significantly to meeting Oxford's unmet housing need. Support is however given for the amendment to the Plan that seeks to make some provision for Oxford's unmet needs solely within Abingdon and Oxford Fringe sub-area.

Paragraphs 2.30-2.31 seem to begin to make a case for the location of Oxford's unmet need within this Sub Area. Paragraph 2.32 then concludes that it is "not considered necessary to allocate any additional sites in the Part 2 Plan within the South-East Vale Sub Area to specifically address unmet housing need for Oxford."

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification

will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed Modification: The City Council would wish to see amendments to the text and the relevant tables to be specific about the sites that will seek to help meet Oxford's unmet housing need.

(Continue on page 4 /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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