

## **Vale of White Horse Local Plan 2031**

### **(Part 1 Strategic Sites and Policies)**

#### **Stage 1 Examination**

#### **Matter 4 – Unmet Housing Needs**

#### **Statement on behalf of Commercial Estates Group**

## **1 Introduction**

- 1.1 This statement is submitted to the Examination into the Vale of White Horse Local Plan on behalf of Commercial Estates Group (hereafter referred to as CEG). CEG is promoting the whole of the draft North Abingdon-on-Thames strategic site allocation for around 800 dwellings.
- 1.2 This statement refers to Matter 4 – Unmet Housing Needs and the matters and questions identified by the Inspector in his ‘Matters and Questions for the Stage 1 Examination’.

## **2 Question 4.1**

**Is the approach to meeting within the District any housing needs which cannot be met elsewhere in Oxfordshire, as set out in Policy CP2, soundly based and does it accord with national policy?**

- 2.1 Yes. The Council recognises that Oxford City may not be able to accommodate the whole of its new housing requirement for the 2011-2031 period (as identified in the SHMA) within its own administrative boundary. There is no indication that any other authorities in Oxfordshire will be unable to meet their own objectively assessed needs.
- 2.2 The Oxfordshire authorities (including Vale of White Horse) are working through the Oxfordshire Growth Board to devise a robust methodology and process to determine how any unmet need shall be accommodated within the county/ housing market area. Policy CP2 recognises the need for a collaborative approach, with the options for accommodating any unmet housing need to be considered in the context of national policy, national guidance and the Environmental Assessment and Habitats Regulations.
- 2.3 There is a commitment in Policy CP2 to continued joint working with the other Oxfordshire authorities. Further, Policy CP2 confirms that if there is an identified and agreed need for any unmet housing need to be accommodated in the Vale of White Horse Council administrative area, the Council will either undertake a full or partial review of the Local Plan 2031, or allocate sites through a subsequent Development Plan Document (DPD).
- 2.4 The recent Written Statement made by the Minister of State for Housing and Planning (July 2015) makes clear that a commitment to an early review of a Local Plan may be appropriate to ensure that a Plan is not unnecessarily delayed by matters which are not critical to its soundness or legal competence.
- 2.5 It is considered that Policy CP2, in conjunction with the other policies in the Local Plan Part 1, provides a robust and pragmatic approach to meeting future housing needs within the District and wider Oxfordshire Housing Market.
- 2.6 The approach being taken by Vale of White Horse Council complies with national policy, by seeking to meet the objectively assessed housing need for the District and, through the duty to cooperate, working with adjoining authorities to meet the housing needs of the wider housing market area. The approach avoids an unnecessary delay in the adoption of an up to

date Local Plan for the Vale of White Horse. It will ensure that there is an up to date and coherent development framework for the area, consistent with the Government's commitment to a Plan led system.

- 2.7 The Vale of White Horse District has strong economic prospects and there is a need for timely housing provision to support forecast economic and employment growth. The Local Plan Part 1 should progress without delay on the basis of meeting the District's own objectively assessed housing needs. There is no merit in delaying the progress of the Vale Local Plan Part 1 until agreement has been reached over the apportionment of any unmet housing need from Oxford City (particularly given that it is likely to take some time to establish the level of unmet housing need arising from the City, and for discussions to conclude over the distribution of the unmet housing need between the surrounding Districts). Any additional housing development required in the Vale (to assist in accommodating unmet housing needs from the City) can best be delivered through an early review of the Local Plan. This is discussed further below.

- 2.8 The findings of the Inspector at the recent Examination into the neighbouring Cherwell Local Plan are of relevance. Paragraph 14 of the Inspector's Report (June 2015) states;

*"Together with the other relevant authorities, the Council has also chosen to make a firm commitment to a joint review of Green Belt boundaries around Oxford in order to help deliver the necessary new homes to meet the city's identified local needs that cannot be met within it in the near future. This should ensure that the overall needs of the countywide housing market area are fully addressed."*

- 2.9 Further, at paragraph 17;

*"Clearly, a joint approach involving all the relevant Councils is required on a co-operative basis to fully address the OANs of the whole county as one overall strategic housing market area. Such a process could only be harmed by Cherwell not meeting its own full district OAN, but if it does then that will at least mean that the pressures on the City of Oxford will not be made any worse by a failure to deliver the necessary level of new housing in this district and the sustainable development of the county as a whole will be materially assisted."*

- 2.10 The approach being taken by Vale of White Horse Council is consistent with that taken by Cherwell District Council. Importantly, the Cherwell Local Plan Inspector has only very recently endorsed such an approach, in finding the Cherwell Local Plan sound.

### **3 Question 4.2**

**What is the likely timescale for agreement being reached between the relevant authorities on (i) the scale of unmet needs in Oxford City (and any other district) (ii) the most appropriate way of any unmet needs being provided for?**

- 3.1 To date, no agreement has been reached over the extent or apportionment of any unmet housing need from Oxford City.

- 3.2 There is no indication that any other authorities in Oxfordshire will be unable to meet their own objectively assessed housing needs.
- 3.3 The Local Development Scheme for South Oxfordshire suggests that the Local Plan 2031 will not be adopted until spring 2017. It is rare that for a local planning authority to prepare a Local Plan more quickly than set out in their Local Development Scheme, but very common for there to be some slippage. It is likely to be at least 18 months before it is known whether there is any unmet need from West Oxfordshire or South Oxfordshire Districts that may need to be accommodated in Vale of White Horse District.
- 3.4 Turning to the matter of Oxford City, it is important to be realistic about the likely timeframe for reaching agreement over the level of unmet housing need arising from the City, and for discussions to conclude over the distribution of the unmet housing need between the surrounding Districts. The proposed strategic work programme is extensive and encompasses;
1. Defining Oxford's unmet needs and securing general agreement between the authorities. This work is on-going and yet to be completed.
  2. Developing a range of Strategic Options to identify potential areas of search for additional housing, which will then be used to help inform the future distribution of this unmet need between the various local authority areas.
  3. Completing a study into the Oxfordshire Green Belt (underway) which will, in combination with the Strategic Options Assessment, help to identify the potential, or not, for development, and the case for additional areas to be added to the Green Belt.
  4. Completing a Strategic Options Assessment to assess each of the Strategic Options and provide a high level sustainability assessment. This will also identify any strategic constraints on the scale of growth in Oxfordshire.
  5. Preparation by the County Council of an Infrastructure Delivery Framework to set out the strategic infrastructure investments required to support growth in parallel with the assessment of strategic options.
  6. Completion of a Statement of Cooperation to feed into subsequent Local Plan Reviews.
- 3.5 The Growth Board's revised timetable suggests that the partnership will not be in a position to reach a short list of strategic options until January 2016. The Board anticipates that the Statement of Cooperation will be published in May 2016, alongside a draft Infrastructure Delivery Framework and the background reports.
- 3.6 This timetable is considered to be 'challenging'. It must be seen in the context of the progress made to date. The Oxfordshire SHMA was issued in its final form in April 2014 (although the local authorities will have been aware of the high level findings in advance). Importantly, in the 18 months or so since the objectively assessed housing need for Oxfordshire was established, the relevant authorities are still working to agree the extent of Oxford's unmet need. This is the first stage in the strategic work programme.
- 3.7 Oxford City Council published a draft SHLAA in September 2014. The work undertaken by the City Council by way of its draft SHLAA was not accepted by three of the neighbouring

authorities, who published their own report 'Unlocking Oxford's Development Potential' in November 2014. This report (prepared by Cundall) suggested that there was potential for some 16,211 additional dwellings from the beginning of 2011/12 onwards - which is 5,919 dwellings more than identified in the Draft 2014 SHLAA.

- 3.8 The final Oxford City SHLAA suggests a housing supply of 10,292 dwellings in the period 2011/12 to 2031.
- 3.9 The Growth Board's Critical Friend, engaged to assist in delivering the strategic work programme, has now been commissioned to review the documentation on this issue.
- 3.10 Once the unmet need has been agreed between the local authorities, in meeting that need reasonable alternative options will need to be considered, with appropriate regard to national planning policy, planning regulations and guidance, the Strategic Environmental Assessment Regulations and the Habitats Directive (Habitats Regulations Assessment) to establish how and where any unmet need might best be accommodated within the Oxfordshire Housing Market Area.
- 3.11 Reaching agreement on the preferred option, across the districts that surround Oxford City, will not be straightforward, with further scope for disagreement and challenging negotiations. This is reinforced by the Inspector's Report into the Cherwell Local Plan, with paragraph 10 stating;

*"The formal arrangements now in place between the various Oxfordshire Councils to fully address the results of the 2014 SHMA for the county, including the needs of the city.... reinforce my conclusion that the duty to co-operate has been met by the Council in relation to this plan. Moreover, I also consider that these arrangements should materially assist satisfactory on-going co-operation. **This is so notwithstanding that that there is as yet no final agreement on how or where the new housing needs of the city that cannot be met within its boundaries, whatever they may be once finally assessed, would be met, as the duty to co-operate is not a duty to agree.**" (writer's emphasis).*

- 3.12 The implications of a delay in progressing the Local Plan pending any such agreement, in light of the time this is realistically likely to take, are discussed under paragraph 5 below.

#### **4 Question 4.3**

**Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?**

- 4.1 Core Policy 2 makes appropriate provision for this by securing a number of alternatives;

The Council would either undertake a full or focused partial review of the Local Plan 2031, or allocate appropriate housing sites and set out any necessary supporting policies in a subsequent Development Plan Document (which might be contained within the Local Plan Part 2, the Science Vale Area Action Plan, or a new DPD).

4.2 We support this approach.

**5 Question 4.4**

**If you contend that the approach set out in Policy CP2 is not soundly based should the Local Plan be delayed pending agreement on question 4.2 (i) and (ii) above or could modifications to the plan be made to make it sound?**

- 5.1 We contend that the approach set out in Policy CP2 **IS** sound and that the Local Plan should **NOT** be delayed pending agreement on the extent of Oxford City's unmet needs and how these needs should be provided for.
- 5.2 As set out above, the time taken for the work relating to Oxford City's unmet housing need to be completed should not be underestimated. If the Vale of White Horse Local Plan Part 1 were to be delayed pending agreement on this matter, even once the process is complete and there is agreement on the extent and distribution of Oxford's unmet need, revisions to the current Local Plan Part 1 would still need to be completed before an adopted Local Plan is in place. This would result in there being a considerable amount of time during which there would be no adopted Local Plan in place for the District, in an area where there is a clear and immediate need to deliver housing growth.
- 5.3 With no up to date Local Plan in place, there would be no certainty for local communities over the location of development, or delivery of necessary supporting new infrastructure. Rather than a plan-led system (advocated by central government and the NPPF), there would be planning by appeal, adding both time and costs to the development process - with a strong risk that the identified need for new housing (and related economic growth) would not be delivered.
- 5.4 It is right that the Council is progressing with the Local Plan Part 1 without delay on the basis of meeting its own objectively assessed housing needs. In view of the scale of housing needed in the District, the national economic importance of the Science Vale area and the District's current lack of a five year housing land supply, it would be nonsensical to delay progress on the Plan whilst the appropriate solution to meeting (the as yet unidentified) needs elsewhere in the housing market area is identified.
- 5.5 This approach was also supported by the Inspector at the recent examination into the Cherwell Local Plan where he accepted the plan was sound and the duty to cooperate complied with and where the Council's Local Plan similarly sought to meet its own objectively assessed needs whilst committing to on-going joint working and early review if necessary to address the needs of Oxford city, once those needs have been fully clarified/ confirmed.
- 5.6 In this respect the Vale of White Local Plan is positively prepared and effective, as it seeks to meet the Council's own objectively assessed housing needs in full, but also contains a commitment in Policy CP2 that it will work jointly with the other Oxfordshire authorities to

jointly meet the objectively assessed needs across the whole Oxfordshire Housing Market Area; once the unmet needs have been established and agreed.

- 5.7 The Council's commitment to an early review if necessary reflects Government policy, as recently confirmed in the July 2015 Ministerial Statement, and avoids unnecessary delay in local plan adoption.