



MATTER 4 – Unmet Housing Needs

Vale of White Horse Local Plan 2031: Part1 - Examination

WRITTEN STATEMENT on behalf of Arnold White Estates Ltd

Project reference	GP 006	Date	5 August 2015
--------------------------	--------	-------------	---------------

Gardner Planning Ltd

**Down Ampney
Bendlowes Road
Great Bardfield
Essex
CM7 4RR**

07887 662166

geoff@gardnerplanning.com

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Gardner Planning Ltd.

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 four initial questions in order to inform the Examination and as a starting point to the round-table hearing session

2.0 MATTER 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 The Framework sets out requirements which must be met at the time of submission. CP2 is a policy to do something in the future (para 1.24 - "will work cooperatively") rather than a policy to actually deliver housing ("having effectively cooperated" - Framework para 181) to accommodate the unmet housing needs of the HMA - principally, but not exclusively, those of Oxford. Some of Matter 4.1 has already been dealt with under Matter 1 (DTC)
- 2.2 The approach of CP2 falls well short of the requirements of the Framework (emphasis added):
- 178: *duty to cooperate on **planning issues that cross administrative boundaries**, particularly those which relate to the strategic priorities set out in paragraph 156 (which includes "homes and jobs")*
 - 179: *Joint working should enable local planning authorities to **work together to meet development requirements which cannot wholly be met within their own areas**.*
 - 181: *demonstrate evidence of **having** effectively cooperated to plan for issues with cross-boundary impacts **when their Local Plans are submitted** for examination ... plans or policies prepared as part of a **joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position**"¹*
- 2.3 The Statement of Compliance with the DTC (DLP10) Table 1 states as follows:
- Joint working – evidence/ arrangements /agreements:*
- Joint Statement of Cooperation agreed by leaders of each council (Sept 2013).*

¹ Framework para 181

2.4 This Statement (DTC01) claims to be September 2013 - which is now 2 years old - but the future tense in para 5.3 (“will take place over the summer 2013) suggests it is earlier. However, it had two principal objectives:

- to commission the SHMA:

“A current example of implementing the requirements of this Statement is the joint work being undertaken in relation to accommodating housing need identified for Oxfordshire. The new Oxfordshire SHMA has been jointly commissioned by the Parties. The SHMA work will take place over the summer 2013.”²

- to take action once the SHMA was published:

“Once this technical work has established the scale of housing required across the housing market area each Local Planning Authority (LPA) must assess the implications for their own area. If we assume that an increase in housing is required, in some or all authorities, those which see an increase in need will have to assess potential new locations for housing sites. Should any of the Oxfordshire LPAs be unable to accommodate their objectively assessed need identified in the SHMA, the remaining Oxfordshire authorities must seek to accommodate this unmet need”³

2.5 The Framework (para 181) states that the ‘accommodation of unmet need’ should have been done “when their Local Plans are submitted”. The DTC as expressed in the Joint Statement must fall within the terms of the Framework, which it does not. However, how this ‘seeking’ (in the second quote above) is progressing in terms of outcomes set out in the Statement of Compliance (DLP10):

outcome	GPL comment
<i>Oxfordshire SHMA commissioned jointly by all the Oxfordshire district councils and supported by Oxfordshire County Council. Consultants appointed. Follow on action identified to agree a process to deal with the outcomes of the SHMA and any un-met need that may arise from one or more authorities while the SHMA work was being undertaken. Date: May 2013</i>	The ‘follow on action’ is described at 6. p 23 (see below)
<i>“Oxfordshire Statement of Cooperation” agreed by the leaders of each local planning authority. Partners use the existing SPIP (Spatial Planning and Infrastructural Partnership) arrangement to act as a coordinating body for joint working. SPIP Executive to meet every six weeks and SPIP Board every three months. SPIP will be supported by OPPO (Oxfordshire Planning Policy Officer Group) to help deliver the technical work required as part of the agreed process, and meet every six weeks or more often as</i>	This is a process not an outcome.

² Statement of Cooperation para 5.3

³ ditto

<p><i>required. OPPO comprises of at least one experienced planning officer from each of the partners. Date: 5 September 2013</i></p>	
<p><i>Workshop held in Oxford Town Hall. Other one-to-one meetings have been held since this. Date: 1 November 2013</i></p>	ditto
<p><i>Oxfordshire Strategic Housing Market Assessment Final Report agreed by the leaders of the local planning authorities. Economic Forecasting to inform the Oxfordshire SEP and SHMA final report also published. Date: 4 March 2014 (SPIP Board); Report published April 2014</i></p>	Publication of the SHMA in April 2014 is an outcome but only the first stage in satisfying the HMA housing needs process.
<p><i>The Local Plan 2031 Part 1 seeks to address, in full, the objectively assessed housing need of the Vale of White Horse district which stems from the Oxfordshire SHMA. In tandem with this, the district council continues to work constructively with our partners on meeting un-met need arising from Oxford City. This is captured in the Local Plan 2031 Part 1 through Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire. This policy commits the council to undertake a full or focused partial review of the Local Plan 2031, or allocation of appropriate housing sites through a subsequent DPD, should the district be required to accommodate any unmet housing need. This is reflected in the 2015-2018 Local Development Scheme. While work continues on an HMA-wide solution to address un-met need, in view of the scale of Vale's own housing need, supply backlog and lack of a five year housing land supply, Vale of White Horse District Council consider that the needs of the Vale and the HMA as a whole are best served by first meeting the council's own housing need including backlog as quick as possible.</i></p>	The CP2 policy is an admission that the Plan as published does not meet unmet needs of the HMA, so is only half an outcome that falls short of what the Framework requires.
<p>Ongoing cooperation (extract, emphasis added) <i>The Growth Board ... is continuing the process of addressing the un-met need and future agreement on how and where this will be best met will come through this process. The process and timetable for addressing un-met need will be agreed by all leaders through the Oxfordshire Growth Board and will act as a monitor to ensure timely delivery of this strategically important piece of work.</i></p>	The future tense makes clear that there is not yet even an agreed process for agreeing the accommodation of unmet need in the HMA.
<p>Appendix 2 lists 'actions' and 'dates', including one meeting with Oxford City Council in August 2014: <i>Oxford City Council did not agree with the approach taken by Vale of White Horse District Council with progressing their local plan prior to Oxford's un-met need being addressed. No resolution made on this matter but work ongoing through the Growth Board in accordance with the Oxfordshire Statement of Cooperation.</i></p>	Appendix 2 is essentially a list of events and dates, not outcomes. However this extract at least

	records a key non-outcome.
Lines 15 - 19 record dates of meetings from September 2014 to March 2015	No outcomes are recorded.

3.0 MATTER 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 Part (i) is essentially a question for VWHDC to answer. The Draft SHMA was published in February 2014. The Submission Document March 2015 'Statement of Compliance with DTC' (DLP10) at Appendix 2 records that meetings about how to act on it commenced in March 2014. In August 2014 Oxford CC are recorded as disagreeing with the VWHDC approach.

3.2 In the case of **Cherwell DC** the history of its LP is as follows

The proposed new Cherwell Local Plan (2006-2031) was submitted to the Secretary of State for Communities and Local Government for formal Examination on 31st January 2014.

The public Examination hearings into the Submission Local Plan were suspended on 4 June 2014 for six months. This was to enable the Council to put forward proposed modifications to the Plan involving increased new housing delivery over the plan period to meet the full, up to date, objectively assessed needs of the district, as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment (2014) (SHMA).

The Proposed Modifications were submitted for formal Examination on 21 October 2014. The Modifications include a new plan period (2011 - 2031) to reflect the 2014 SHMA.⁴

3.3 The Inspector had achieved a substantial increase in housing numbers in the Plan from 16,750 in the submission plan (January 2014) to 22,840 when the Examination resumed in December 2014 (having been suspended in June 2014). The second examination was held in December 2014 and based on the findings at that time (including the process of apportioning unmet housing needs). The Inspector found that the DTC had been complied, in the following terms (emphasis added)

The formal arrangements now in place between the various Oxfordshire Councils to fully address the results of the 2014 SHMA (HOU 12d) for the county, including the needs of the city, as now referred to in para B.89b of the plan, as modified, reinforce my conclusion that the duty to co-operate has been met by the Council in relation to this plan. Moreover, I also

⁴ Cherwell DC website 30.7.15

*consider that these arrangements should materially assist satisfactory on-going cooperation. **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.***⁵

- 3.4 Nine months after that position was noted, the situation seems to have remained unchanged: there is still ‘no final agreement on how or where the new housing needs of the city that cannot be met within its boundaries’. The Minutes of the Growth Board 25 June 2016 (Appendix 4 to this Statement⁶) show that as of August there are still no tangible outcomes. However, the ‘Housing Need Distribution’ which should, at last, address the issue of Oxford’s unmet needs will be agreed by the Growth Board in February 2016.
- 3.5 Paragraph 5 of the Growth Board minutes (Appendix 4) record that a **Planning Inspector attended an Officers’ workshop** in February 2015 and seemingly endorsed the ‘adopt a plan for VWH housing needs now, and deal with the HMA needs later’ approach. No further details seem to be available, no minutes are part of the submitted Document Library. Whatever the context of that reported advice, it does seem contrary to the Framework para 182 and the decisions of two Inspectors in the cases of Aylesbury Vale and Central Bedfordshire⁷.
- 3.6 Moreover, both the Officers’ meeting with an Inspector (February 2015) and the Cherwell Inspector’s Report (9 June 2015, reporting on the Examination in December 2014) have been overtaken by SoS and Ministerial advice of 21 July 2015⁸:

... there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan.

- 3.7 In the case of the large unmet housing need of Oxford which needs to be addressed as a matter of urgency, and the scale of that unmet need which means that a VWH LP will be fundamentally different to the submitted version, the comments about ‘shortcomings which are not critical to the whole plan’ cannot apply to VWH.
- 3.8 So, the optimism about the problem being solved by a contingency approach may have evaporated, knowing then what we know now may have produced a different outcome. However, when Part 1 of the VWHL P Examination sits in September/October 2015 there will be

⁵ Cherwell Inspector’s Report 9.6.15 para 10

⁶ Growth Board programme (Appendix 4) Table p2 item 6

⁷ AVDC and CBC Inspectors’ Reports summarised in GPL Matter 1 Statement paras 2.11, 2.12

⁸ referred to in GPL Matter 1 Statement paras 2.15 - 2.18

only 4 - 5 months until a definitive distribution is agreed. The preparation of the South Oxfordshire LP has already taken on board the requirement to meet housing needs now and abandoned a contingency approach (see below).

- 3.9 Alternatively, if the LPs around Oxford were to be adopted with a contingency approach then the required urgency to resolve the issue of providing for Oxford's unmet needs would be 'kicked into the long grass'.
- 3.10 The second part of 4.2 (ii) - *the most appropriate way of any unmet needs being provided for* - is therefore either 'carry on with fingers crossed' then produce a second plan (with a different spatial strategy and scale of growth which will cater for all housing, employment and infrastructure needs as soon as 2016); or more appropriately 'wait until February' and revise the Plan accordingly.

4.0 MATTER 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 Yes, with VWH accommodating its share of Oxford's unmet housing need the spatial framework would fundamentally change given the scale of that need, as illustrated below:

Table GP1⁹

	need (mid point) ¹⁰	average p.a. ¹¹	supply	average p.a.	comment
Oxford	28,000	1,400	10,212 ¹²	511	shortfall 17,788
West Oxford	13,200	660	10,500 ¹³	525	shortfall 2,700
Cherwell	22,800	1,140	22,840	1,142	LP 2031 adopted July 15 Table 3 (includes 10,000 homes in Bicester Garden City)
South Oxford	15,500	775	11,400 ¹⁴	570	shortfall 4,100
Vale of the White Horse	20,560	1,028	21,060 ¹⁵	1,053	includes 900 windfalls and 1,000 in LP Part 2
TOTAL	100,060	5,003	76,012	3,801	shortfall 24,048 homes by 2031; or 1,202 p.a.

4.2 If the supply position of Districts were to change such that each could meet their own needs, the scale of housing shortfall of Oxford within the HMA (some 18,000 homes) even if shared out equally equates to some 4,500 additional homes per surrounding District. That scale, if it were to be added to the VWH allocations would require a substantial re-evaluation of the spatial strategy, it could not be an 'add-on'. Also the distribution of housing will need substantial revision if the needs of Oxford are to be met.

4.3 South Oxfordshire has already begun the process of assisting Oxford with its unmet needs. The Local Plan 2031 Refined Options February 2015 includes the following

For this consultation, we have assumed that South Oxfordshire will need to consider planning for around 3,000 homes for Oxford in addition to the 3,600 extra homes for our own needs.¹⁶

4.4 This Local Plan will be submitted in April 2016¹⁷, which will allow it to absorb publication of the 'apportionment' exercise of the Oxford HMA planned for February 2016 (see para 3.4 above).

⁹ first included in GPL representations to LP Dec 2014, now updated

¹⁰ HMA SHMA HOU01.2 March 2014 Fig 2

¹¹ assumes 20 year period

¹² Oxford Housing Land Availability and Unmet Need Assessment Dec 2014 Table 11 p52 (Appendix 1)

¹³ West Oxford LP 2031 Submission March 2015 Policy H1 p40 (Appendix 2)

¹⁴ South Oxford LP 2031 Refined Options Feb 15 p14 (Appendix 3)

¹⁵ VWH LP 2031 (Nov 2014) Core Policy 4

¹⁶ South Oxford LP 2031 Refined Options Feb 15 p16 (Appendix 3)

¹⁷ South Oxfordshire LDS Jan 2015

5.0 MATTER 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 5.2 [4.2?] (i) and (ii) above or could modifications to the plan be made to make it sound?

- 5.1 CP2 is 'unsound'. Because of the scale of change likely to be required (but currently unknown), modifications would not be an appropriate way forward. As already pointed, the Growth Board are scheduled to receive a Report on housing apportionment in January 2016.
- 5.2 Either
- the VWHLPI Inspector could find the LP has not satisfied the DTC and should be withdrawn (as in the case of Central Bedfordshire and Aylesbury Vale) - see Matter 1
 - or could suspend the Examination until the apportionment is agreed (January 2016) then invite a modified Plan
 - or recommend withdrawal if such a delay were likely to be more than 6 months.



Matter 4

Appendix 1: Oxford Housing Land Availability and Unmet Need Assessment Dec 2014 Table 11 p52

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd



Oxford's Housing Land Availability and Unmet Need Assessment

December 2014

Stage 4: Assessment Review - Summary of Results

- 166.** Appendix A lists all sites assessed as part of the SHLAA with a conclusion about the suitability and availability of each site in terms of potential development for housing. For sites which have been assessed as suitable and available, an indication of the number of dwellings achievable on each site is shown and the expected timescale for delivery in Appendix B.
- 167.** As well as suitability and availability, sites must also be viable to be judged as achievable for housing delivery. Individual viability assessments for each site have not been carried out as existing evidence demonstrates that the majority of sites in Oxford City are viable, and for those where the landowner can demonstrate unviability, the Council can be flexible in applying Affordable Housing requirements to allow a site to become viable. Instead, a typology approach has been applied to indicate the likely viability.
- 168.** In summary, the housing potential from all sites which have been assessed as suitable, available and achievable is **6,422** dwellings. In addition, there is an estimated windfall of **180** dwelling per year. Windfalls are excluded from 2011/12 - 2013/4 to avoid double counting of completions. Windfalls are also excluded from 2014/15 to avoid double counting of existing small site commitments likely to be completed in 2014/15. Windfalls are therefore only counted over a 16 year period from 2015/16 – 2030/31. With an estimate of 180 windfall dwellings per year this equates to **2,880** dwellings.
- 169.** Housing completions for years 2011/12, 2012/13 and 2013/14 were 228, 213 and 70 respectively totalling **511** dwellings. Student accommodation completions over the same period equate to **104** dwelling completions and C2 completions equate to 33 dwellings. Small site commitments at 31st March 2014 total **262** dwellings. The total capacity for 2011-2031 is therefore **10,212** dwellings.

Table 11: SHLAA summary table

Housing Supply 2011/12 to 2030/31	Reference	Dwellings
Total potential housing from identified sites (including residential, student and C2)	<i>Appendix B</i>	6,422
Windfall dwellings 2015/16 to 2030/31	<i>Stage 3</i>	2,880
Completions 2011/12 to 2013/14		648
<i>Housing</i>	<i>AMR 2014</i>	<i>511</i>
<i>Student accommodation (equivalent dwellings)</i>	<i>Table 9</i>	<i>104</i>
<i>C2 residential care home (equivalent dwellings)</i>	<i>Stage 3 and Table 10</i>	<i>33</i>
Small site commitments extant at 31 st March 2014		262
<i>Housing</i>		<i>252</i>
<i>Student accommodation (equivalent dwellings)</i>		<i>10</i>
<i>C2 care homes</i>		<i>0</i>
Total supply		10,212



Matter 4

Appendix 2: West Oxford DC LP 2031 Policy H1 p40

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd



WEST OXFORDSHIRE
DISTRICT COUNCIL

West Oxfordshire Local Plan 2031



Distribution of Housing

- 5.18 In accordance with the overall strategy (Policy OS2) this Local Plan seeks to focus the majority of new housing development at the District's three main towns of Witney, Carterton and Chipping Norton. This strategy has been tested extensively through consultation and sustainability appraisal (SA) and is considered to represent the most appropriate and sustainable strategy for West Oxfordshire.
- 5.19 It also ensures that in accordance with national policy, at least 10 years' worth of specific, developable housing sites have been identified including allocated Strategic Development Areas (SDAs) at Witney, Carterton and Chipping Norton.
- 5.20 The remaining housing requirement will be met in the Eynsham – Woodstock and Burford – Charlbury sub-areas, with a particular focus on the main rural service centres and other larger settlements.
- 5.21 The Council's Strategic Housing Land Availability Assessment (SHLAA) provides an initial assessment of the suitability and deliverability of a number of sites. Additional site allocations will be made in these sub-areas as necessary through the anticipated early review of this Local Plan. The Council will work with the towns, parishes and local communities to identify suitable and deliverable sites including through Neighbourhood Plans.
- 5.22 The proposed distribution of housing is summarised in Policy H1 below. It should be noted that the housing figures for each sub-area are indicative and should not be taken as absolute requirements or targets. It should also be noted that housing land supply will be calculated on a district-wide basis rather than individually for each sub-area.
- 5.23 An allowance has been made for future 'windfall' sites yet to come forward, excluding 'garden land' development in line with the NPPF.

Policy H1 – Amount and Distribution of Housing

West Oxfordshire will provide at least 10,500 new homes between 1st April 2011 and 31st March 2031 (525 per year). In accordance with the overall strategy, the majority of new homes will be provided in the Witney, Carterton and Chipping Norton sub-areas with a particular focus on Witney, Carterton and Chipping Norton.

The proposed distribution of housing will be as follows:

Witney sub-area	3,700 homes
Carterton sub-area	2,600 homes
Chipping Norton sub-area	1,800 homes
Eynsham – Woodstock sub-area	1,600 homes
Burford – Charlbury sub-area	800 homes

This is an indicative distribution and should not be taken as an absolute target for each sub-area or maximum ceiling to limit development.

Development will be monitored annually to ensure that the overall strategy is being delivered. Sites for new housing will be identified through partnership working with local communities, landowners and self-build groups including the use of parish or neighbourhood plans.

Housing Delivery

- 5.24 In this section of the plan we explain how the proposed housing target and distribution set out in Policy H1 above will be delivered. Regard should also be had to Section 9 which sets out the proposed strategy for each of the five sub-areas in more detail.



Matter 4

Appendix 3: South Oxford DC LP 2031 Refined Options Feb 15 p14

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd

South Oxfordshire LOCAL PLAN 2031

REFINED OPTIONS

STAGE TWO OF THE PROCESS

FEBRUARY 2015



Please share
your opinions
& help shape our
South Oxfordshire

www.southoxon.gov.uk/newlocalplan

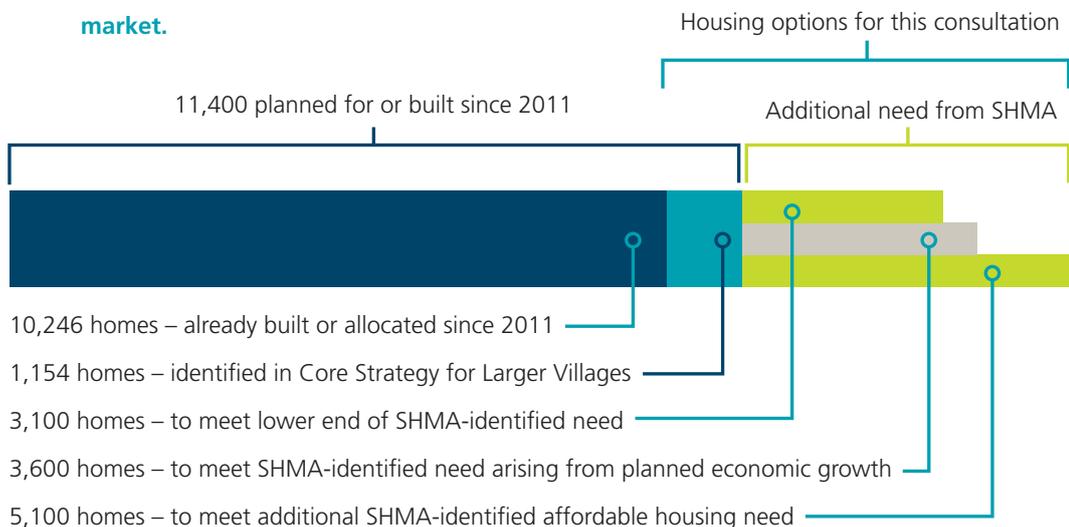
How many extra homes?

£ AFFORDABLE HOUSING is housing provided at rates substantially lower than prevailing market rates to specified eligible households whose needs are not met by the market. It includes social rented, affordable rented and intermediate housing (like shared equity homes - part rent, part buy). Most affordable housing is provided through a registered social landlord. It is normally provided by housing developers as a requirement to build 40% affordable housing when they build homes for sale or rent on the open market.

In 2014 together with the other Oxfordshire authorities and using Government guidance we prepared a study called the Strategic Housing Market Assessment (SHMA) to understand how many new homes we need to provide. The SHMA looked at both the expected growth in population and at the anticipated economic growth between 2011 and 2031. Based on these, it recommended the amount of housing we should be planning for (known as the 'Objectively Assessed Need' or OAN). It also looked at the affordability of housing in South Oxfordshire and identified a need for additional affordable housing (see left), based on our Core Strategy policies which require 40% of new homes to be affordable. We explained in our Issues & Scope consultation that the cost of housing in South Oxfordshire is particularly high and that even the cheapest homes for sale cost more than ten times the annual earnings of someone on an average income.

The SHMA identifies a total need for between 14,500 and 16,500 homes for South Oxfordshire over the twenty year period 2011-2031. Around 15,000 homes are required to support planned economic growth – this is primarily to meet the needs of our existing businesses wishing to expand and to allow for new business formation at similar rates to the past – while an increase in the total number of new homes above this would go further towards meeting our affordable housing need.

We have already made provision for around 11,400 homes through allocations in our adopted Core Strategy and more recent planning permissions and commitments, including a 660 home allowance for potential windfall developments in future years⁴. Based on the SHMA evidence, to meet our own housing need we will therefore need to plan for between 3,100 and 5,100 additional new homes over the 2011—2031 period.



⁴ This includes provision in residential care homes ("C2 uses") and permitted development changes from employment "B uses", retail "A uses" and agricultural buildings to housing.



Helping our neighbours

Our neighbours in Oxford City tell us they cannot find sites within the city to build all of their identified housing need. In these circumstances we are required by government to consider if we can help. We are working with the other Oxfordshire councils to identify the scale of this “unmet need”, and potential options and infrastructure requirements to meet it. Many of you suggested that the City should be making effective use of its land resources, and as part of this work we will be re-examining the housing within Oxford⁵. For this consultation, we have assumed that South Oxfordshire will need to consider planning for around 3,000 homes for Oxford in addition to the 3,600 extra homes for our own needs.

YOUR
VIEW

Q3: *Is 3,600 for our needs and around 3,000 for Oxford City the correct number of additional new homes we should plan for, if not why?*

⁵ 'Unlocking Oxford's Development Potential', Cundall's Report, November 2014, www.southoxon.gov.uk/evidence



Matter 4

Appendix 4: Minutes of the VWHDC Growth Board June 2015

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd

Growth Board 25 June 2015

Agenda item 2

Contact: Paul Staines; Growth Board Programme Manager

E- mail Paul.staines@westoxon.gov.uk

T: 01993-861695

Post SHMA Strategic Work Programme

Recommendations

That the Growth Board:

- (i) **Note the revised timetable for the Post SHMA Strategic Work Programme, re-affirm their approval of the Programme and their commitment to its delivery.**
- (ii) **Agree to authorise the establishment of a partnership holding account and ask each partner authority to transfer £60,000 to the account for the purposes of financing the Programme**

Purpose of the Report

1. To provide the Growth Board with an update on the Post-SHMA Strategic Work Programme (the Programme), to seek re-approval for the revised Programme and approve a methodology for payment of associated costs.

Background

2. The Growth Board, at its meeting on 20 November 2014, endorsed the principles of the Post SHMA Strategic Work Programme, designed to consider the implications of the SHMA and associated issues of unmet housing need in line with the Duty to Co-operate. Some key principles which should underpin the post SHMA work were agreed and are set out below:
 - The district Local Plans are sovereign and all work should feed into Local Plans for them to determine the spatial future of the districts;
 - A recognition however that the work must be collaborative and joined up to provide a county wide spatial picture and strategy;
 - A recognition therefore that joint work on future spatial options, transport infrastructure and green belt will be required to feed into Local Plans;
 - Recognition that the City cannot fully meet its housing needs and there is a need to agree on the level of unmet need. However work on determining spatial options in Local Plans can commence alongside this;
 - A wish that the timescale for completing the Review is 12 – 18 months and that this should not hold up Local Plan timescales.

Growth Board 25 June 2015

Agenda item 2

Contact: Paul Staines; Growth Board Programme Manager

E- mail Paul.staines@westoxon.gov.uk

T: 01993-861695

3. Subsequently officers, through the Growth Board Executive Officer Group (EOG), developed a detailed Work Programme. This is designed to test the potential strategic options to meet the unmet housing needs of Oxford City in order to determine the distribution of this unmet need between the City and District Councils.
4. The Programme is predicated on strategic options being identified by individual districts whilst the County would lead on infrastructure and green belt studies and play a partnership role in the appraisal and assessment of spatial options. The intention of the programme is to present to the Board a proposed housing distribution that will then be taken forward through the Local Plan processes of individual districts.
5. To provide an independent view of the robustness of the Programme arrangements were made through DCLG for a senior representative of the Planning Inspectorate to attend a workshop session with EOG in February of this year. He endorsed the approach being put forward as in his opinion meeting the Duty to Co-operate from a legal perspective and being appropriate under the circumstances, recognising the differing positions and starting points of the respective partner authorities.
6. This endorsement has now been reinforced by the findings of the Cherwell Local Plan Inspector as set out in his recently published report. He states that the formal arrangements in place to address the results of the 2014 SHMA (this Programme) lead him to conclude that Cherwell have met the Duty to Cooperate and that these arrangements should assist in ensuring satisfactory on-going cooperation. It follows therefore that the continued progression of the Programme should therefore help other partners demonstrate on-going cooperation in line with the Duty.

Green Belt Study

7. The partners have appointed a consultant, Land use consultants (LUC) to undertake this study.
8. Importantly it should be noted that this is not a formal review of the Green Belt but rather will form part of the evidence base for future Local Plan reviews of the Green Belt if required. The study will examine the performance of separate identified land parcels agreed by the districts against the five statutory tests of green belt suitability, a necessary precursor to any potential formal review.
9. The Programme acknowledges that it is important that the study looks at the Green Belt as a whole to provide a common basis for assessment, whilst fully taking into account work which may have been previously undertaken. It is

Growth Board 25 June 2015

Agenda item 2

Contact: Paul Staines; Growth Board Programme Manager

E- mail Paul.staines@westoxon.gov.uk

T: 01993-861695

envisaged that the Green Belt Study will inform the assessment of strategic options.

Critical Friend

10. Fortismere Associates have been appointed to undertake this role to act as moderator/facilitator, to shine the light of objectivity upon areas of disagreement or tension and provide technical guidance at key stages through the process. The main tasks are:
 - To act as a critical friend in the project to facilitate the partners towards agreement , as far as is possible, on the figure for unmet need in Oxford City by critiquing the Oxford SHLAA, the Cundall report commissioned by South, Vale and Cherwell and the Oxford response to this and any other relevant information.
 - To act as a critical friend for the Programme by overseeing a process of check and challenge at specific defined points in the Programme, usually towards the end of specific projects.
 - To act as an on-call technical planning advisor to the Growth Board and EOG.

Strategic Options Development and Assessment

11. A key early element of the Programme is the identification of strategic options for growth by City and District partners. The strategic options are intended to be high-level areas of search rather than defined sites and will have a minimum threshold of 500 dwellings.
12. The next stage would be to test the strategic options identified against a number of agreed criteria to assess their sustainability. These criteria will include key sustainability issues such as infrastructure, water supply, biodiversity etc. Importantly it will also test the suitability of the areas of search against the primary requirement of the programme to meet the housing needs of Oxford City, for example by proximity or transport links.
13. Having completed the sustainability tests the final element of this work will seek to examine detailed transport modelling for the short list of strategic options identified. Owing to the complexity and cost of transport modelling this would only be applied to a shortlist of the strategic options identified at the conclusion of the various sustainability tests referred to above.

Growth Board 25 June 2015

Agenda item 2

Contact: Paul Staines; Growth Board Programme Manager

E- mail Paul.staines@westoxon.gov.uk

T: 01993-861695

Financial implications

14. In the November 2014 report to the Growth Board officers attempted an initial estimation of the costs of the Programme. As the programme has progressed estimated costs have been confirmed and more detailed estimations have been possible. Accordingly, a revised summary of the Programme costs are detailed in the table below.

Project	Actual/ (Estimated) costs- £
Cost of Critical friend (including provision)	30,000
Cost of Green belt study	51,000
Costs of assessment of strategic options	181,000
Costs of infrastructure planning and modelling	125,000
Water supply and habitat assessments	50,000
Total	437,000

15. The Growth Board are asked to note the costs and agree to approve the payment of an initial sum of £60,000 per authority into a partnership holding account, held by the lead authority, for the purposes of paying the costs of the programme as they arise.

Conclusions

16. The revised Programme demonstrates the progress made to date but also recognises the slippage. Officers believe that the revised timetable is realistic, albeit challenging but acknowledge that it will not be achieved without the full continued commitment of all partners to the programme and ask the Growth Board to reaffirm that full commitment to help ensure satisfactory on-going cooperation..

Post SHMA Strategic Work programme

No.	Programme Element	Lead Council(s)	Resources	Tasks	Outputs	Original Completion Date	Revised completion date	Notes
1	Programme Set Up	WODC	Growth Board Programme Manager/ In-house staff	Prepare Detailed Project Plan, agree project leads, identify resources, and define steering and reporting arrangements	Detailed Project Plan for approval at February Growth Board	January 2015	January 2015	
			Growth Board Programme Manager/ In-house staff	Recruit/Identify Strategic Planner to support the Growth Board Programme Manager	Fixed term/ seconded Strategic Planner	February 2015	May-15	Agreed to be part of the tender for a critical friend
			Growth Board Programme Manager/ In-house staff	Engage external expert Critical Friend to independently validate and comment on the programme at key stages	Critical Friend appointed	February 2015	May-15	Appointed Mid May
			Growth Board Programme Manager/ In-house staff	Develop communications strategy and Growth Board website	Communication Strategy and Website Information	February 2015	February 2015	Comms strategy completed.
2	Define Oxford's Unmet Need	OCityC	In-house staff/ Consultants	Detailed response from VOWH, SO and CDC on Oxford SHLAA (Cundall Review)	Cundall Report	November 2014	November 2014	
			Critical Friend	Critical Friend reviews Oxfords SHLAA and responses from rural districts and recommends an unmet need figure for Oxford based upon existing policy, with policy change options to be considered as a Strategic Option(s) and tested	Critical Friend Review Paper	February 2015	May-June 2015	Delayed as consequence of delays in appointing critical friend
			In-house staff/ Consultants	OCityC and rural districts consider Critical Friend recommendation	Agreed position between OCityC and rural districts on unmet need figure, OCityC publish final SHLAA	March 2015	May-June 2015	Delayed as consequence of delays in appointing critical friend
3	Strategic Options development to inform housing distribution	WODC	Growth Board Programme Manager/ Strategic Planner/ In-house staff	Define scope of Strategic Options (i.e. size thresholds and essential criteria) and prepare standard information template (SHLAA compatible)	Scoping Paper and Standard Information Template	January 2015	Mar-15	Scoping paper agreed on 23rd March.
			Individual Districts	In-house staff	Further calls for sites (if necessary)	Revised District SHLAA (if necessary)	March 2015	
				Individual Districts generate Strategic Options	Strategic Options for all rural districts	March 2015	May/June 2015	
		WODC	Growth Board Programme Manager/ Strategic Planner/ In-house staff	Collate combined list of Strategic Options	Draft Strategic Options list	March 2015	May/June 2015	This will now be done by districts themselves to save time and a task to compare as part of check and challenge agreed
		All Councils	Critical Friend, Growth Board Programme Manager/ Strategic Planner/ In-house staff/ Consultants	Check and Challenge workshop on Strategic Options list to ensure that all reasonable options have been included	Final Strategic Options list	March 2015	W/C 3rd-9th June	
4	High Level Sustainability Appraisal and Strategic Options Assessment	OCountyC	In-house staff	Finalise brief and procure consultants for Sustainability Appraisal, Green Belt Study	Project Brief	February 2015	February 2015	Agreed on 24th February
			Consultants	Set Objectives and Baseline for Sustainability Appraisal	Sustainability Objectives and Baseline Report	March 2015		
		Individual Districts	In-house staff	Assess physical capacity, strategic green infrastructure requirements, deliverability, phasing and timescales of Strategic Options	Extended information templates	April 2015		
		OCountyC	In-house staff/ Consultants	Study the relative contribution of areas of land to the purposes of the Oxford Green Belt in order to identify the potential, or not, for development, and the case for additional areas to be added to the Green Belt.	Draft Report on Green Belt Study	June 2015	Aug-15	
				Identify any strategic environmental constraints	Report on Strategic Environmental Constraints	June 2015	Oct-15	
				Identify any strategic infrastructure constraints	Report on Strategic Infrastructure Constraints	June 2015	Oct-15	
				Identify any strategic water constraints	Report on Strategic Water Constraints	June 2015	Oct-15	
				Assess Strategic Options for consistency with Strategic Economic Plan	SEP Consistency Paper	June 2015	Oct-15	
				Infrastructure assessment of Strategic Options, including transport	Infrastructure analysis of Strategic Options	June 2015	Oct-15	
				Assess landscape and heritage impact of Strategic Options	Landscape and heritage analysis of Strategic Options	June 2015	Oct-15	
				High level viability assessment of Strategic Options	Report on viability assessment of Strategic Options	July 2015	Oct-15	
		All Councils	Critical Friend, Growth Board Programme Manager/ Strategic Planner/ In-house staff/ Consultants	Check and Challenge workshop on emerging evaluation of Strategic Options	Revised Draft Sustainability Appraisal Report and Revised Draft Report on Green Belt Study	July 2015	Nov-15	
OCountyC	Critical Friend	Critical Friend review of evaluation of Strategic Options to ensure that this is justified and appropriate	Final Sustainability Appraisal Report and Final Green Belt Study Report	August 2015	Nov-15			

Post SHMA Strategic Work programme

5	Infrastructure Delivery Plan	OCountyC	In-house staff/ Consultants	Collate existing IDPs and evidence	Comprehensive evidence base	March 2015	Mar-July 2015	Background work already commenced by County	
				Define scope of infrastructure assessment work and transport assessment/ modelling	Detailed Project Brief	March 2015	Mar-July 2015		
				Assessment of funding and delivery of Infrastructure options, including Government (e.g. LGF Round 3), land value capture, etc.	Funding options assessment	June 2015	Jul-15		
				Develop infrastructure options to support delivery of Strategic Options and other district growth proposals	Draft options	July 2015	Oct-15		
			First Draft Strategic Infrastructure Delivery Plan	July 2015	Nov-15	Due in draft early November			
		All Councils	Critical Friend, Growth Board Programme Manager/ Strategic Planner/ In-house staff/ Consultants	Check and Challenge workshop on emerging infrastructure plans and priorities	Revised Draft Strategic Infrastructure Delivery Plan	July 2015	Nov-15		Timetabled for late November
		OCountyC	Critical Friend	Critical Friend review of Draft Strategic Infrastructure Delivery Plan to ensure that this is justified and appropriate	Revised Draft Strategic Infrastructure Delivery Plan	August 2015	Nov-Dec 2015		
			In-house staff/ Consultants	Assess Local Plan Growth Proposals as they emerge	OCountyC comments on Local Plans/ Development proposals	tbc	Nov-Dec 2015		
				Finalise Strategic Infrastructure Delivery Plan	Final Strategic Infrastructure Delivery Plan	tbc	Nov-Dec 2015		
		6	Housing Need Distribution	WODC	Critical Friend	Recommendations from Critical Friend on Strategic Options to inform distribution	Report to Growth Board		August 2015
Recommendations on housing distribution between districts	Report to Growth Board					August 2015	Jan-16		
Assess implications for 5 year housing land supply	Report to Growth Board					August 2015	Jan-16		
All Councils	Critical Friend, Growth Board Programme Manager/ Strategic Planner/ In-house staff			Check and Challenge workshop on Critical Friend's emerging recommendations	Report to Growth Board	August 2015	Jan-16		
	Growth Board Programme Manager/ Strategic Planner/ In-house staff			Growth Board consider recommendations and decide housing distribution between districts	Agreed position on housing distribution	September 2015	Feb-16		
	Growth Board Programme Manager/ Strategic Planner/ In-house staff			Publish statement of cooperation setting out agreed distribution	Revised Statement of Cooperation	September 2015	Feb-16		
7	Strategic Habitat Regulations Assessment	CDC	In-house staff	Prepare brief and procure consultants	Project Brief	October 2015	Feb-16	This project requires the transport modelling carried out as part of the infrastructure delivery plan. This will not be completed until December 2015	
				Consultants	Screening of Recommended Strategic Options	HRA Screening of Strategic Options Report	November 2015		
				Appropriate Assessment (if required)	Appropriate Assessment	tbc			
8	Water Cycle Strategy	CDC	In-house staff	Prepare brief and procure consultants	Project Brief	October 2015	Mar-16	This project will now commence alongside Local Plan reviews	
			Consultants	Prepare Water Cycle Strategy	Water Cycle Strategy	tbc			
9	South Oxfordshire Local Plan	SODC	In-house staff/ Consultants	Refined Options Consultation	Consultation documents	March 2015	tbc	TBC	
				Consider the Green Belt Study Report in the context of the agreed housing distribution and where appropriate incorporate Green Belt boundary adjustments into local plan process	Consultation documents	September 2015	tbc		
				Preferred Options Consultation	Consultation documents	October 2015	tbc		
				Publication Draft Local Plan	Draft Local Plan	April 2016	tbc		
				Submission		August 2016	tbc		
				Examination		Autumn 2016	tbc		
10	Future Local Plan Reviews	WODC	Growth Board Programme Manager/ Strategic Planner/ In-house staff	Agree Local Plan Review Timetable	Agreed timetable to be incorporated into Statement of Cooperation	September 2015	Feb-16	TBC	
				Individual Districts	In-house staff/ Consultants	Develop Local Plan Growth Proposals to address agreed housing distribution	Consultation documents		CDC September 2015, Others tbc
			Consider the Green Belt Study Report in the context of the agreed housing distribution and where appropriate incorporate Green Belt boundary adjustments into individual local plan process(es)	Consultation documents		CDC September 2015, Others tbc	tbc		
			Informal consultation on emerging proposals through Local Plan Reviews (OCC, CDC, VOWH, WODC)	Consultation documents		CDC November 2015, Others tbc	tbc		
			Publication of Local Plan Reviews (OCC, CDC, VOWH, WODC)	Draft Local Plan Reviews	CDC March 2016, Others tbc	tbc			
11	General Governance/ Administration	WODC	In-house staff	Support for Executive Officer Group, Project Team, Growth Board, General Administration, Communications Strategy etc.	n/a	n/a	n/a		
Total Resource									