

VALE OF THE WHITE HORSE LOCAL PLAN EXAMINATION MATTER 4 – UNMET HOUSING NEEDS

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?

Policy CP2 is unsound because it does not provide a clear and effective strategy that shows clearly how VWHC and the other Oxfordshire authorities will address the problem of Oxford City's unmet need. It leaves too much to chance and unilateral, rather than collective, action. It will not bind the four hinterland authorities to cooperate to review their plans to a coordinated schedule to ensure that the unmet need can be tackled, and ideally addressed by 2031. The plan, as drafted, fails the positively prepared and effectiveness tests of the NPPF.

As we have argued under Matter 1 it is unreasonable for the hinterland Oxfordshire authorities to continue to maintain that the size of Oxford City's unmet need is unquantified and this means it is not feasible to devise a unified strategy to address this question. In itself this would suggest the absence of cooperation within Oxfordshire. We consider that there is adequate evidence in the public domain that points to the size of Oxford City's unmet need. Moreover, the inability of Oxford City to accommodate all its housing and other development needs is a long established issue that dates back to at least the SEP, if not the days of the Structure Plan.

Core Policy 2 fails to commit the VWHC, or the other authorities of the Oxfordshire HMA, to an agreed schedule to review their plans by a given date. Consequently, there is no certainty of when the Oxford City problem will be confronted, and if it will ever be addressed through this generation of plans covering the period up to 2031. There is a grave danger that the housing needs of a large element of the population will be ignored.

Since the publication and submission of the plan for examination, we are aware of the report to Cabinet dated 7 August 2015. This sets out a strategy to address the Oxford City problem. This is a very encouraging step and goes some way towards allaying the HBF's concerns about the extent to which the duty to cooperate in Oxfordshire is being effectively discharged. It is encouraging because it shows that the VWHC is beginning to consider how many homes it might be able to accommodate of Oxford's shortfall. The report indicates that 3,000 dwellings is the number may be to be accommodated in the Vale based on the mid-point of the SHMA and its own assessment of Oxford City's capacity. (Although we have referred to this figure of 3,000 dwellings we remain neutral at this stage as to whether this is the correct number that needs to be accommodated. Oxford City will need to provide its perspective on the capacity assessment that has been commissioned by South Oxfordshire, Cherwell and Vale councils).

The Cabinet report also hints at a provisional timetable to undertake a review of the Vale's plan. Appendix C to the report is a Motion proposed by Councillor Sharp and

agreed by the Council on Wednesday 16 July. This proposes a timescale of 12-18 months. However, it is unclear whether this timescale would commence after the VWHC's Part 1 plan has been adopted, or after the Part 2 is adopted, or once all the other joint work by the Oxfordshire authorities has been concluded. In short, the timetable for completing a new plan is still very unclear.

To make the plan sound, a timetable with dates needs to be included within Core Policy 2.

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?

This remains the HBF's chief concern with the local plan, and by extension, the plans of the other HMA authorities: there is no specified timetable to address the problem. The Oxfordshire authorities will be under no compunction to review their plans to account for Oxford.

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?

Yes, it is almost inevitable that a planning response to the problems of Oxford City will require a different spatial strategy in the VWHC and the other authorities of the HMA. It is unlikely that the Science Vale geographic area will be able to absorb an additional circa 3,000 dwellings by 2031, although it may be capable of doing so post-2031.

As we have stated under Matter 3, the HBF tries to avoid commenting on locations for growth – it is the responsibility of the Council to decide the most appropriate spatial strategy – but the growth of the settlements of Abingdon and Botley by releasing Green Belt land would provide one scenario. Another would involve Green Belt release of the edge of Oxford City. Alternatively, the Council could consider allowing the growth of the Wantage/Grove and Faringdon market towns. The ideal solution, however, would probably be to allow Oxford City to breathe by loosening its corsets.

4.4 If you content that the approach set out in policy CP2 is not soundly based should the Local Plan be delayed pending agreement on 5.2 (i) and (ii) above or could modifications to the plan be made to make it sound?

We do not think that the plan should be delayed but a modification is necessary.

The HBF is very concerned that the duty to cooperate is proving to be a very ineffective planning instrument. It is a voluntary arrangement, but disappointingly, rather than embracing their new liberties in a positive way, most local authorities seem to be retreating behind the argument that the duty to cooperate is not a duty to agree.

We do not think that the VWHC falls into this camp. There are positive aspects to the VWHC plan, not least its decision to adhere to the recommended range in the 2014 SHMA, which demonstrates a willingness to cooperate to some degree. Moreover the Vale has shown itself to be more willing to confront the Oxford City problem than other authorities in the HMA like South Oxfordshire and West Oxfordshire.

Delaying adoption of the plan would mean that the Council would have to continue to operate on the basis of the SEP housing figures (578 dpa). These figures would clearly be inadequate when compared with the more up-to-date evidence of housing needs in the SHMA (1,028 dpa). This would mean that the housing needs of a significant number of people would be neglected until such a time as a new plan could be produced, examined and adopted. This delay would also result in difficulties for the implementation of the economic objectives of the plan, including delivery of the Science Vale.

Nevertheless, planning for Oxford City is a very important matter, and an unsound plan cannot be made sound by relying on a review. Therefore, in order to rectify this shortcoming a modification to Core Policy 2 is necessary.

Proposed modification to make the plan sound

Core Policy 2 should be amended to include a timetable for the production of a new plan for the Vale. This should commit the Vale to having a new plan in place that will show where and when it will accommodate the 3,000 homes (or possibly more) that are needed to assist Oxford City. We consider that the new plan should be ready and adopted by 2018. This will allow just enough time to implement the new plan's housing objectives before 2031.

Core Policy 2 should also be re-drafted so that it is clear if this new plan is not ready by 2018 then the policies in the Part 1 and Part 2 Local Plans that pertain to housing supply should be accorded limited weight.

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