

VOWH LOCAL PLAN PART 1 EXAMINATION

HEARING STATEMENT

MATTER 4: UNMET HOUSING NEEDS

ON BEHALF OF REDROW HOMES

Word Count: 1,698

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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?

- 1.1 Paragraph 181 of the NPPF states that local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when a Local Plan is submitted for examination. The intended process of collaboration is a vital component of implementing the Oxford and Oxfordshire City Deal (January 2014). Through the City Deal the Government outlined the future national role of Oxford and the consequential need for increased housing provision,

"More housing is essential for the future of the knowledge economy in Oxford and Oxfordshire." (Page 5).

- 1.2 Accordingly, City Deal partners recognise the need for local authorities to work collaboratively to identify a more strategic and ambitious approach towards delivering housing growth. Indeed, this is essential to the future of the knowledge economy in Oxfordshire. The Council's commitment to delivering its own housing need and the wider need in Oxfordshire is clearly expressed in paragraph 3.19 of Topic Paper 1 supporting the Local Plan,

"While it is important that Vale progresses with the adoption of its own Local Plan for the reasons stated above, it is also important that in parallel we are proactive in working with all the Oxfordshire authorities to determine the quantum of unmet housing need for the whole of the Oxfordshire area, and we are committed to doing so."

- 1.3 This issue was explored extensively as part of the Cherwell Local Plan examination where the Inspector found the proposed strategy of co-operation between the Oxfordshire authorities to be sound. Paragraphs 14, 17 and 18 of the Inspector's Report, shown below, outline the Inspector's satisfaction with the strategy for co-operation and the commitment from Oxfordshire authorities to address any unmet housing need in the future.

"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.” (Paragraph 14)

“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.” (Paragraph 17)

“am satisfied that it is appropriate for this plan to proceed on that basis, provided that there is a firm commitment from the Council to play its part in addressing the needs of Oxford city through that joint process in the near future, once those needs have been fully clarified/confirmed.” (Paragraph 18)

- 1.4 Main modification B.89b to Policy BSC1 of the Cherwell Local Plan reiterates and formalises the approach to addressing Oxford’s unmet housing need.

“Cherwell District Council will continue to work under the ‘Duty to Co-operate’ with all other Oxfordshire Local Authorities on an on-going basis to address the objectively assessed need for housing across the Oxfordshire housing market area and to meet joint commitments such as the Oxford and Oxfordshire City Deal (2014)”.

As a first step Cherwell District Council has sought to accommodate the housing need for Cherwell District in full in the Cherwell Local Plan.

“Cherwell District Council recognises that Oxford may not be able to accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary.”

.....If this joint work reveals that Cherwell and other Districts need to meet additional need for Oxford, this will trigger a partial review of the Local Plan, to be completed within two years of adoption, and taking the form of the preparation of a separate Development Plan document for that part of the unmet need to be accommodated in the Cherwell District.”

- 1.5 The VoWH Cabinet Report (Agenda Item 6 from the meeting held on Friday 7th of August 2015) further underlines the Council's commitment to co-operate and gives an up to date indication of emerging scenarios to meet any unmet need arising from across Oxfordshire authorities. Paragraph 1 of the Cabinet Report states,

"This report sets out to endorse a high level approach for the council to address its share of any unmet housing need arising from elsewhere in Oxfordshire. It is in effect a preparatory paper for the Issues and Scope consultation stage to help address, once defined and evidenced, the proportion of Oxford City unmet housing need that may fall to the Vale to plan for."

- 1.6 The measures and commitments that VoWH have put in place within Core Policy 2 are in line with the mechanisms put forward in the Cherwell Local Plan, which has been found sound, subject to modifications. Accordingly, we endorse the Council's pragmatic approach to addressing Oxford's unmet housing need once it has been quantified which is plainly a logically prior step to making decisions about the extent to which VoWH, and the other authorities neighbouring Oxford City, should cater to meet all or part of that unmet need, and if so, what the appropriate strategic delivery mechanism should be.
- 1.7 Core Policy 2 is a key policy helping to deal with the short term need for a local boost to housing completions whilst securing the framework to underpin the delivery of Oxford's needs in the medium term. The approach adopted by the Council will make an immediate contribution to supporting nationally significant economic development in the Oxford area, and that in itself is a clear and compelling reason to proceed on these terms at the present time while simultaneously making a commitment in the terms set out in Core Policy 2.
- 1.8 Redrow Homes acknowledge that the housing requirement figure in Core Policy 4 does not incorporate the accommodation of new dwellings that cannot be delivered elsewhere in Oxfordshire. Accordingly, Redrow Homes endorse the inclusion of Core Policy 2 in the Local Plan, which outlines the Council's ongoing commitment to fulfilling its statutory 'duty-to-cooperate' with all other Oxfordshire local authorities in accordance with the Oxfordshire Statement of Co-operation.

- 1.9 The Oxfordshire Statement of Co-operation outlines the commitment that the local authorities will jointly meet, in full, the objectively assessed need across the Oxfordshire housing market area. Redrow Homes consider that the response mechanism outlined in Core Policy 2, in terms of potentially undertaking a Local Plan review or producing a Site Allocation style document to address unmet need, is a sound and appropriate way to proceed at this time. Indeed, it is an eminently reasonable approach to adopt at this stage, since the precise extent of Oxford City's unmet need has not yet been conclusively established, nor has there been an assessment (by local planning authorities or in terms of Strategic Environmental Assessment/Sustainability Appraisal) of where, when, and precisely how that unmet need can be met across Oxfordshire as a whole.
- 1.10 The soundness of the decision taken by Oxfordshire authorities to progress their own Local Plans and address Oxford City's unmet need through a potential future Local Plan Review is in line with the Government's target for Council's to adopt a Local Plan at the earliest opportunity, which reflect the first bullet point of paragraph 17 of the NPPF. In a July 2015 letter to the Planning Inspectorate the Secretary of State for Communities and Local Government, Greg Clark MP, stated that,
- "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. We have acknowledged this in planning guidance by setting out that Local Plans may be found sound conditional upon a review in whole or in part within five years of adoption."*
- 1.11 Accordingly the approach to meeting within the District any housing needs which cannot be met elsewhere in Oxfordshire, as set out in policy CP2, is soundly based and it does accord with national policy. In particular it complies with the indication in paragraph 153 of the NPPF that *"Each local planning authority should produce a Local Plan for its area. **This can be reviewed in whole or in part to respond flexibly to changing circumstances.** Any additional development plan documents should only be used where clearly justified"* (emphasis added).
- 1.12 The position regarding Oxford City's unmet housing need has not yet been established. The Oxfordshire authorities have committed to one another to meet it, jointly, when its extent has been established. Accordingly it is not possible, and it would not be rational, to plan for meeting that need now; it has not yet been

established. When it is established, decisions will be needed as to how, where and when to meet the need across Oxfordshire as a whole. That is a process which will involve dialogue between all of the authorities, and interested parties, in the context of additional Sustainability Appraisal/SEA. Its outcome cannot be predicted, or subject to SA/SEA at this stage. But there is a clear and compelling need, in the context of a plan-led system, to produce a new-style Local Plan that complies with the NPPF/NPPG as soon as possible. In those circumstances there is a clear justification for the early review/response mechanism contained in Core Policy 2, which will provide the flexibility to respond to changing circumstances.