

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Dijkman Planning LLP (Mr Ken Dijkman)
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<b>Version</b>	0.3
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.**

Submitted in support of - OXFORD GARDEN CITY

These representations relate to approximately 2000 hectares of available land within the heart of Oxfordshire. The creation of a new settlement within this District would have consequences far beyond this immediate administrative area. It is not something that can realistically be allocated in a limited scope local plan such as this. It cannot deal with the early delivery of houses within the beginning of the plan period, the first five years. In the absence of a regional strategy the promotion of a new

settlement falls to be considered by the duty to cooperate but with difficult barriers to achieving consensus given different local plan programs and different authorities sometimes conflicting individual priorities. Within central Oxfordshire there is a genuine and acknowledged problem in terms of dealing with the unmet housing need around Oxford City. The city itself favours the major release of greenbelt, this is something which in planning policy terms is undesirable. Nor does it represent a long-term solution other than the continual erosion of the greenbelt.

#### Oxford's Green Belt and housing land shortfall

On 5 December Oxford City Council published an Assessment of Housing Land Availability and Unmet Need.

It noted that an Oxfordshire-wide Strategic Housing Market Assessment, published in April, concluded there was an Objectively Assessed Need (OAN) for Oxford of 24,000-32,000 new homes between 2011 and 2031. Due to the constraints on land within Oxford it would not be possible to accommodate this entirely within the city's boundary.

The SHLAA identified land availability in Oxford to indicate the housing that it might accommodate. The remainder was its unmet need.

The housing potential from all sites assessed as suitable, available and achievable was 6,422 dwellings. There was also an estimated windfall of 180 dwelling per year. Windfalls were excluded from 2011/12-2013/4 to avoid double counting of completions and from 2014/15 to avoid double counting of existing small site commitments likely to be completed in 2014/15.

They were only counted over a 16 year period from 2015/16-2030/31. With an estimate of 180 windfall dwellings per year this equated to 2,880 dwellings. Housing completions for years 2011/12, 2012/13 and 2013/14 were 228, 213 and 70 respectively totalling 511 dwellings.

The total capacity for 2011-2031 was 10,212 dwellings. However this was the maximum that could be achieved, as it was highly optimistic to assume that all the sites identified would be made available or brought forward in the plan period to 2031, and the potential for new sites to come forward was severely limited because of physical constraints.

The maximum figure assumed an optimistic and sustained level of windfall sites including: residential garden land; sites currently designated as Green Belt which would have to be successfully reviewed through a Local Plan to be allocated for housing; the possibility that some sites currently identified as available for housing might need to be re-designated for employment; over-optimistic and ambitious assumptions about some sites and comments from environmental bodies (including Natural England) that site assessments did not take account of policy requirements such as SUDs or density on sites adjoining conservation areas or heritage assets.

When the housing need ranges were compared to a housing supply of 10,212 this gave a shortfall ranging from:

13,788 (compared to the lower end of Oxfordshire's SHMA of 24,000) 17,788 compared to the mid point of 26,000, and 21,788 compared to the upper range of 32,000.

The Council leader said in a statement: "In light of this enormous need, the Council were determined to ensure the most thorough assessment yet of the availability of housing land in Oxford. In line with national guidance, the study equally recognises the need to protect the integrity of our natural and historic assets, as well as safeguarding sports and community infrastructure so important to the well-being of local communities."

The conclusions to the study show a shortfall of up to 21,800 homes. Even a more conservative estimate of Oxford's need shows a shortfall of 17,800 homes compared with what can be realistically and sustainably achieved. This leaves us with no doubt that a strategic review of the Oxford Green Belt, to allow us to plan for a sustainable urban extension, is urgently needed."

The Council noted that the assessment would "form the basis for agreeing with its neighbouring districts the level of Oxford's unmet housing needs that will need to be accommodated outside of the city's boundaries".