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Mark Williams
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By email

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Dear Mark

Oxford City Council response to Vale of White Horse Local Plan Part 1 Publication

Oxford City Council welcomes the opportunity to comment on the Vale of White Horse Local Plan Part 1.

However the City Council has a fundamental objection to the approach taken in the Plan to the Duty to Cooperate, in particular regarding meeting Oxfordshire's housing needs, and to the link between this and the soundness of the proposed Plan.

You will be aware from our previous discussions and representations to earlier consultations on the Plan that Oxford is facing a deepening housing crisis, with various national surveys carried out in recent years identifying Oxford as the least affordable city in the country. The severe constraints on land availability within Oxford's administrative boundaries mean that we must look to neighbouring districts, which are geographically much larger than Oxford, to provide housing land within close proximity of Oxford to meet a portion of Oxford's housing needs. It is necessary to urgently begin to address the significant unmet housing need of the City that was most recently identified in the Oxfordshire SHMA 2014.

Local Plans must comply with the Duty to Cooperate, which expressly means addressing cross-boundary development needs and achieving outcomes to this within the Plan. There is no support in Government policy, guidance or published best practice for references to future arrangements or future joint working to address cross-boundary needs. The City Council concludes therefore that, overall, the Vale Local Plan Part 1 fails to meet the legal test for the Duty to Cooperate, and cannot be assessed as a sound Plan. It also fails to consider all reasonable alternatives and therefore is legally vulnerable when considered against the SEA Directive.

These are complex matters that overlap and are not entirely separate, I have as far as possible cross-referenced each point raised with the relevant paragraph/part of the Plan, and indicated the Test of Legal Compliance or Soundness to which it applies.

Duty to co-operate and overarching Soundness issues (in particular relating to meeting Oxfordshire's housing needs)

It is to be welcomed that the Duty to Co-operate Topic Paper (para 3.4) recognises that the following are all strategic issues related to making provision for housing needs from Oxford:



“Specific comments relating to Vale’s duty to cooperate included:

- concerns that Vale would need to address some or all of the un-met need expected to arise from Oxford City and potentially from other neighbouring authorities in the housing market area*
- some comments raised the point that Vale’s Local Plan was proceeding prematurely in relation to the above point and questioned its soundness as a result*
- some general comments in support of the inclusion of a policy in the local plan looking at addressing Oxford’s un-met need*
- Oxford City Council objected to the Housing Supply Update consultation in that it did not make provision for any unmet Oxford City needs*
- request for clear and demonstrable cooperation to take place between relevant authorities regarding the expansion of Oxford Brookes University*
- some commented on the need for a strategic review of the entire Oxford Green Belt rather than a local review”*

However we would comment that to simply note these issues without ensuring that they have had sufficient influence on the Plan is inconsistent with the Duty to Co-operate.

In terms of joint working and effective outcomes, regard must also be had to the Duty to Cooperate and Tests of Soundness. The NPPF sets out the Tests of Soundness that are supported by PPG:

Tests of soundness in NPPF (paragraph 182) (emphasis added):

- *positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so while achieving sustainable development, and*
- *effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

PPG sets out that this process should produce “effective and deliverable policies on strategic cross boundary matters” (paragraph 001 Reference ID: 9-001-20140306).

The City Council acknowledges that there has been effective joint working in jointly commissioning and producing the SHMA. The Oxford and Oxfordshire City Deal was a further example of successful joint working across all the local authorities in the County: this commits the authorities to meeting the Oxfordshire objectively assessed housing need in full. The City Council is actively engaged with the post-SHMA process as a member of the Growth Board and its subsidiary groups. However the Duty to Cooperate is not just about process but also about achieving effective outcomes, and the current wording in the proposed policies is not effective with regards to meeting Oxfordshire’s housing needs. It fails to address Oxford’s unmet need, which for some years has been clearly and irrefutably evidenced, and pushes into the future any commitment from the Vale District Council to address this.

The Duty to Cooperate Topic Paper (para 3.17) refers to the agreed ‘post SHMA’ process, which is being overseen by the Growth Board, and we welcome this process as facilitating a useful dialogue. However that process explicitly refers to the ‘sovereignty’ of Local Plans and does not guarantee any appropriate provision for Oxford’s unmet needs. It therefore falls to individual Local Plans that have not yet been adopted to include outcome-based (rather than future process-based) policies to address the unmet need.

I would refer you to the letter from the City Council dated 4th April 2014 to Scott Riley responding to the Housing Delivery Update and our further letter dated 8th August 2014 to Ronan Leydon for evidence of the City Council’s clear and longstanding concerns regarding the Duty to Cooperate.

1 - Introduction

Paragraphs 1.9, 1.11, 1.22, 1.23, 1.24, 1.32 and Core Policy 2

It is clear that an outcome-based policy is needed to comply with national policy and established best practice in plan-making. The NPPF states in paragraph 47:

“To boost significantly the supply of housing, local planning authorities should... use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”

The NPPF is clear that the OAN relates to the Housing Market Area – in this case the county of Oxfordshire. Meeting only the Vale of White Horse’s Objectively Assessed Housing Need (OAN) as an ‘important first step’ is therefore not compliant with the NPPF which requires that the OAN of the whole Housing Market Area should be addressed.

Paragraph 178 of the NPPF makes it clear that the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. Paragraph 179 goes on to say:

“Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework.”

Reflecting this and recent experience of local plan examinations, a recent Planning Advisory Service publication, “Doing Your Duty – Practice Update” advises:

“It is not sufficient for an authority to acknowledge that it may have to address potential unmet needs from within its own HMA and adjoining HMAs by including a proposed contingency approach in their plan to trigger a review with neighbouring authorities to agree a future strategic framework for local plans. The plan has to be assessed on the level of cooperation that has led to the current draft plan and not what may happen in the future.” (subsection 9, page 11)

It is clear therefore that the **Duty to Cooperate has not been complied with** (a **legal compliance** issue) as it has not produced effective and deliverable policies on strategic cross-boundary matters. This means that it is also **not effective** (a soundness issue).

The City Council would also want to stress that in the event that the Vale Plan is found sound in 2015, the ongoing work of the Growth Board in respect of addressing the Oxford unmet need would mean that the Plan would be out of date within a very short period of time. This would also render the Plan **not effective**, and is misleading to communities, developers, and Neighbourhood Planning groups.

The Vale cites the example of the Inspector currently examining the Cherwell Local Plan as a reason to permit the plan to progress without specific provision for Oxford. It should be remembered that the Cherwell Plan, and the approach taken, has not yet been found sound, and that in any event it is not directly transferrable to the Vale scenario because the joint work has moved on significantly since Cherwell submitted its plan. Most significantly in relation to paragraph 3.40 of the Duty to Cooperate Topic Paper, Oxford City has now published Oxford’s Housing Land Availability and Unmet Needs Assessment (see below).

Paragraph 1.22 refers to the Oxford City SHLAA being underway at the time of writing. We can now confirm that this work has been finalised and published¹, and takes into account all of the comments made by Vale and the other districts during the 'check and challenge' process. The SHLAA identifies a capacity of 10,212 in the City 2011 to 2031. This is considerably short of the need identified in the Oxfordshire SHMA of 24,000 to 32,000 homes. I would highlight that a draft SHLAA reporting a similar number was circulated to VoWH Council on 1st October, well before the Vale Plan was finalised and published and within 6 months of the publication of the SHMA. It cannot be appropriate for the Vale Plan to ignore the implications of this evidence which was available well before publication of the plan.

In light of the background, there is no justification for not making provision in Plan policies or delaying the process. Well before commencement of preparation of the Vale Local Plan, Oxford's unmet needs were known to be of a scale that would require a strategic approach in the context of the Local Plan Part 1: the evidence for this includes the former South East Plan and supporting evidence base (as highlighted in the corresponding Panel Report) and the previous 2007 SHMA. Therefore for **paragraph 1.23** to explicitly make provision only for Vale's own housing needs whilst disregarding Oxford's unmet needs is not an appropriate strategy when assessed against alternatives, and is therefore **not justified**. (This also applies to all other relevant parts of the Plan.)

It follows that the Spatial Strategy proposed cannot be **justified**. The proposed approach is to disperse strategic housing development across a number of settlements, including rural villages, which only goes as far as addressing the Vale's own objectively assessed need. This is not considered to be the most sustainable strategy. An alternative, and in the City Council's view far more sustainable, spatial strategy would be to focus more strategic development close to the main urban centre of Oxford. This would better reflect the evidence on commuting patterns in Oxfordshire, and the economic strategy signed up to by all Oxfordshire authorities that confirms Oxford as one of three main growth areas in the County. The alternative strategy should also incorporate Oxford's unmet housing need. This reasonable alternative has not been tested: as such, it is clear that the Green Belt review unilaterally undertaken by Vale of White Horse is a flawed exercise. It will be very quickly rendered out-of-date in light of joint work on a County wide spatial strategy (which expressly includes a strategic Green Belt review) due to conclude within a 12-18 month period, and which could recommend a spatial strategy for housing within the Vale (and other districts) that is more akin to the alternative Oxford-focused strategy requested by the City Council.

2 – Key Challenges and Opportunities

Paragraphs 2.8 and 4.10 refer to the 'key challenge' of 'providing for our housing need'. The Objectively Assessed Housing Need (OAN) for VoWH of 20,560 homes is referred to. In order to provide the right context and ensure the Plan is **effective**, this must also refer to the unmet need with the Housing Market Area particularly that arising from Oxford.

Paragraph 2.13 refers to the 'key challenge' of delivering a shift towards more sustainable modes of travel, and then lists the ways in which this could be achieved. However there is no recognition of the significant level of out-commuting, nor the importance of locating development close to the main urban centre of Oxford to achieve this. The City Council notes the latest Census 2011 analysis of commuting patterns that shows an average 10,800 journeys per day from Vale of White Horse to Oxford (around three times as many as travelling to the second most popular destination, South Oxfordshire). This is an increase of 430 journeys (4% increase) since 2001.² Lack of consideration of this issue means that the Plan is **not effective**.

3 – Spatial Vision and Objectives

Strategic Objectives SO3, SO8 and SO9 envisage growth being directed to the most sustainable locations in the district, reducing the need to travel, promoting sustainable modes, and ensuring appropriate and timely infrastructure. These objectives are **supported**. With reference to the comment on paragraph 2.13 above it is clear that these objectives steer towards a spatial strategy that includes development close to the main urban centre of Oxford, which is the greatest travel generator in the area, and would provide the best opportunity for achieving high sustainable mode shares, reducing the need to travel and making most efficient use of infrastructure.

4 – Spatial Strategy

Paragraph 4.3 is **supported** as it recognises the strong linkage of the Abingdon / Oxford Fringe sub area with Oxford. However this is not further recognised or exploited in the actual strategy – see later comments.

Figure 4.2 does not represent an **effective** strategy as it does not recognise the influence of Oxford on Vale communities, workers and employers in the high tech industries. The City Council **objects** to this.

Core Policy CP4 (Meeting our Housing Needs) does not recognise Oxford's unmet need, only the Vale's own OAN. This is **inconsistent with national policy**, is **not justified** and is **not effective** (see above under 'Duty to Cooperate'). The housing distribution proposed represents a 'spreading' of development to relatively unsustainable village settlements that are highly car-dependent and in some cases lack the infrastructure necessary to support the level of development proposed. The policy overall is therefore **not justified** and **inconsistent with national policy** with regards the meaning of sustainable development.

With the required increase to the overall housing provision in the Vale in order to address Oxford's unmet need that is likely to be on a scale of several thousand (see comments on SA below), it is not likely to be sustainable to simply continue the existing distribution of growth across the district which is designed to meet the needs of the district. When provision is made for meeting Oxford's unmet needs then the distribution and strategic locations need to reflect a more sustainable pattern of development that in particular better reflects travel patterns. This requires a step change approach; in the City Council's view alternative spatial strategies taking account of Oxford's unmet need should have been tested.

Core Policy 6 (Meeting Business and Employment Needs) and **Core Policy CP15** (South East Vale including Science Vale) – the City Council supports the recognition of Science Vale as an important growth node on the Knowledge Spine as agreed in the Oxford City Deal and Strategic Economic Plan, and for its important contribution to meeting the overall housing need in Oxfordshire. However it is felt that the strong inter-relationship between Science Vale and Oxford as the home of the Universities and hospitals is not sufficiently recognised. The SEP is clear that the three key areas for employment and housing growth are Bicester, Oxford and Science Vale, and that the Strategy is dependent on the delivery of all three elements in combination. The City Council **objects** to these policies and supporting text on this basis (**not effective**).

Core Policy CP7 (Infrastructure) – the City Council would **comment** that it will be far more difficult to deliver the types and level of infrastructure identified given the dispersed nature of many of the strategic housing sites to rural villages as set out in Policy CP4. I would request opportunity for the City Council to participate in the examination hearing that considers this policy.

5 – Sub-Area Strategies

Section 5 (Sub Area Strategies) recognises the strong functional links between the Abingdon-on-Thames and Oxford Fringe Sub-Area with the City, and this is welcomed. Data indicates that the level of commuting into the City is 10,800 trips daily (around three times the equivalent number of trips into South Oxfordshire), illustrating the importance of the Oxford economy in providing jobs for the Vale, and the inseparable nature of the respective housing markets. Given the 4% increase in trips from the Vale into Oxford between 2001 and 2031, the indications are that these commuting patterns will continue during the Plan period.¹

The City Council considers that the needs from Oxford would be most sustainably met by directing development that cannot be accommodated within the City boundaries, to areas immediately adjoining the urban area. The City Council must conclude that overall, the strategy for the Abingdon/Oxford Fringe is not the most appropriate strategy when considered against alternatives and is therefore **not justified**.

Paragraph 5.50 refers to the Strategic Economic Plan and Oxford City Deal; recognition of these is welcomed. However in order to be **effective** this paragraph should also recognise Oxford as a key economic driver for Science Vale and Oxfordshire as a whole. The City Council **objects** on this basis.

Core Policy CP8 (Abingdon / Oxford Fringe) - CP8 sets out a housing requirement for the Abingdon-on-Thames and Oxford Fringe area of 5,438 for the period to 2011 to 2031, caveated to meeting only the needs arising in the Vale. It states that: *“If or when required, needs arising elsewhere in the Housing Market Area, will be addressed by timely and effective cooperation working in accordance with CP2”*. For the same reasons as set out above in respect of the Duty to Cooperate, this is **inconsistent with national policy, not justified** as the most appropriate strategy, and **not effective** due to the delay to meeting the pressing housing needs evident within the wider Housing Market Area (particularly Oxford).

In principle the City Council sees merit in the strategic housing site allocations to the north of Abingdon. As identified by the City Council’s ‘Oxford Strategic Growth Options: High Level Review of Opportunities’ (October 2014)³, there is potential to review the Green Belt boundary in this area whilst maintaining its overall function, and the area offers good connectivity to Oxford and key employment sites to the south of the City.

Given the north of Abingdon area is identified as a potential urban extension for Oxford, this area provides a potential opportunity to take forward the Duty to Cooperate obligation to address Oxford unmet need. The Green Belt is to be further reviewed early in 2015 in the context of the Oxford unmet need. Therefore the approach to Green Belt review and consideration of spatial options here is piecemeal given there may need to be further strategic allocations in this area to address the Oxford unmet need. The strategy is therefore **unjustified** as it is not the most appropriate strategy, and **not effective** due to the issues described.

The City Council is not wholly satisfied that land to the east of the A4183 is appropriate for development and Green Belt review given it is more constrained in heritage, landscape and visual terms, and until a joint approach to Green Belt review is taken, **objects** on this basis as it is **not justified**.

Core Policy CP9 (Harcourt Hill) – The City Council has an interest in how this site develops due to its relationship with Oxford Brookes’ sites in Oxford. I would request opportunity for the City Council to participate in the examination hearing that considers this site.

Core Policy CP11 (Botley) – The draft Plan is not clear as to the role of Botley centre. The supporting text to the policy infers the objective to be improved self-containment. It is not clear why this is necessary given the proximity of high-order services in Oxford (both City centre and

Botley Road retail park) which are in close proximity and easily reached by a high-frequency bus service.

Given the lack of evidence (or signposts), lack of clear vision and objectives to justify the approach taken, and the lack of recognition of the relationship of proposals for Botley with Oxford, the City Council **objects** to the policy as **not justified**.

Core Policy CP12 (Safeguarding land for highways improvements) – The City Council has an interest in how highways improvements are planned for and taken forward in this area. I would request opportunity for the City Council to participate in the examination hearing that considers this policy.

Core Policy CP13 (Oxford Green Belt) and **paragraph 5.41** – It is stated that the 'local' Green Belt review leading to proposed boundary changes does not preclude a strategic review "*should this be needed*". The City Council regards this as an inaccurate statement: there is no doubt that a strategic Green Belt review is needed, as reflected in the Growth Board work programme which commits to undertaking the strategic review by June 2015, in light of the Oxford unmet need.

Furthermore it is entirely at odds with NPPG paragraph 83 of the NPPF which states:

"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."
[emphasis added]

It is clear from the NPPF that the Green Belt boundary should be changed once and once only, and not in a piecemeal fashion as proposed in Core Policy CP13. In this case, it has been agreed that a strategic Green Belt review should be undertaken by the Oxfordshire Growth Board, and this may lead to further changes being necessary to the Oxford Green Belt in the Vale. The joint review is due to be concluded in June 2015, and the likely outcome is that further changes may need to be made to the Green Belt boundary to address Oxford's unmet needs before the Vale Local Plan even reaches adoption. This would mean that the Plan would be immediately out-of-date. In conclusion, the City's view is that the 'local' Green Belt review and proposed boundary changes are **inconsistent with national policy**, as well as premature and therefore **not justified** when considered against reasonable alternative strategies. It also renders the plan **ineffective** due to the practical considerations explained.

Core Policy CP14 (Upper Thames Reservoir safeguarding) – The City Council **supports** this policy as it is important to ensure provision of infrastructure relating to water supply for the wider area.

6 – District wide policies

Core Policy CP33 (sustainable transport) – The City Council **supports** in particular criterion (iv) 'support improvements for accessing Oxford'. However it is noted that this will be challenging given the relatively dispersed pattern of development set out in the Spatial Strategy, particularly given the challenges that exist on the road network especially the A34.

Core Policy CP34 (A34 Strategy) – the City Council **supports** this policy.

CP35 Public Transport Walking Cycling – the City Council **supports** this policy. It is noted that paragraph 6.75 acknowledges that increasing these modes will be difficult in rural areas, which

points to need to focus more development close to urban areas and particularly Oxford which has amongst the highest non-car mode share in the country.

Core Policy CP39 (Historic Environment) – The City Council **objects** to this policy in one particular respect. It is **not effective** as there is no reference to Oxford skyline as a heritage asset. The policy needs to recognise Oxford view cones. (This is particularly relevant to Botley and Harcourt Hill proposals.)

Core Policy CP47 (Delivery and Contingency) – The City Council **objects** to this policy. It needs to specifically recognise the challenges of delivering housing in sensitive edge-of-village locations in the Green Belt, and state a strategic Green Belt review will be necessary to address potential under-delivery elsewhere as well as to provide a contingency mechanism to address Oxford unmet need. Without this clarification, the mechanisms set out are weak and the policy is **not effective**.

Sustainability Appraisal and SEA compliance

The City Council has reviewed the Sustainability Appraisal Report published alongside the Draft Local Plan. As noted above, the City Council is concerned that the Plan has not considered fully Oxford's unmet housing need. The Plan does not adequately address the relationship with the City, and how the potential need for Oxford to grow cross boundary into the Vale would be addressed. To rely on a review of the Plan is not an effective approach. The option should have been considered through the SA. **It is therefore considered that the SA (incorporating SEA) does not comply with the SEA Directive and therefore the Legal Compliance test has been failed.**

The City Council welcomes the acknowledgement about the role that the HMA authorities will have in helping to provide additional housing in response to Oxford's unmet need, for example in section 4.1.2. It is noted that the SA has tested (in response to the publication of the 2014 SHMA) a 'housing delivery growth option'; Option G: *"Plan to meet the number of homes set out in the SHMA (20,560 houses over the plan period)"* as *"a first and important step towards meeting the full needs of the HMA within the HMA without unreasonable delay"*. It is noted that whilst this option is an increase on the previous upper option (15,898), it does not in any way contribute towards addressing the unmet housing need of Oxford. The City Council therefore considers that additional, higher 'growth options' incorporating a portion of the Oxford need must also be assessed through the SA.

The City Council has, in its representations to previous stages of the Plan, and in meetings with VoWH officers, clearly requested consideration of options for addressing Oxford's unmet need in line with NPPF requirements. The SHMA was published in April 2014, although the Vale's Strategic Sites and Policies – Housing Delivery Update published in February included subsequently confirmed figures from the draft SHMA, and a key summary was published in March. Even before this, the need to accommodate Oxford's unmet housing need outside its boundaries was clear. Hence it is disappointing that reasonable alternatives reflecting this have not been assessed. The City Council considers that the Strategic Environmental Assessment is not legally compliant unless all reasonable alternatives have been assessed. As the Oxford unmet need has not been addressed, this renders the SA unlawful until such as time that the SEA addresses the Oxford unmet need.

There is now even clearer evidence of the scale of Oxford's unmet need. The Oxford Housing Land Availability and Unmet Needs Assessment (December 2014) assessed Oxford's housing capacity over 2011-31 as 10,212, whilst a counter exercise carried out by VoWH, SoDC and SODC with consultants Cundall argues the Oxford capacity is 16,211. The SHMA determines Oxford OAN to be 24,000 – 32,000. Hence the Oxford unmet need outside its boundaries is at *very least* 8,000 homes even if the lowest end of the Oxford OAN range and an unfeasibly high capacity assessment of Oxford of 16,000 dwellings is assumed. If the upper end of Oxford's OAN

is assumed, the unmet need figure increases to 16,000. A third scenario could consider the Oxford SHLAA capacity assessment of circa 10,000 against the upper end of the SHMA range (32,000), to give an unmet need figure of 22,000. As one of four geographically large districts in Oxfordshire, VoWH can, as a working assumption, reasonably be expected to accommodate 25% of Oxford's unmet need, giving three further strategic housing delivery options that should be assessed within the SA:

- VoWH OAN + 2,000 pursuant to Oxford unmet need, i.e. 22,560 in total;
- VoWH OAN + 4,000 pursuant to Oxford unmet need, i.e. 24,560 in total;
- VoWH OAN + 5,500 pursuant to Oxford unmet need, i.e. 26,060 in total.

For the SA to have assessed all reasonable options and therefore comply with the requirements of the SEA Directive, further SA work should be carried out to test these options or similar, reflecting the Oxford unmet need.

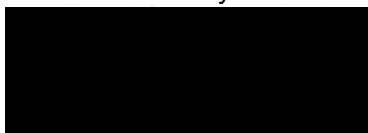
It is also a concern that clearly all options relating to 'overall pattern of development' have been arrived at prior to publication of the SHMA in April 2014, and without reference to the Oxford unmet need. It is also evident that the SA assesses too narrow a range of options, which exclude consideration of unmet housing needs from within the housing market area from Oxford City, and fails to recognise the spatial option of meeting a portion of housing needs within close proximity to the neighbouring major urban area that is Oxford (noting that Green Belt sites have not been excluded from the site assessment). This is despite the need to consider these alternative strategies being apparent from the NPPF. In light of this, the City Council considers that it is necessary to test an additional option for the 'overall pattern of development' that would focus development adjacent or in close proximity to Oxford. Whilst the SA includes Option C "*as extensions to the edges of main settlements*", it is considered that a bespoke option looking at development adjacent to Oxford may score differently when assessed as a discrete option rather than in combination with other settlements.

Concluding remarks

It is with regret that Oxford City Council is obliged to maintain a fundamental objection to the approach taken in the Vale Local Plan Part 1. This is due to the failure to take adequate account in the Plan of Oxford's well-evidenced and substantial unmet housing need. This runs contrary to the NPPF and the Duty to Cooperate which require that the full, objectively assessed needs of the housing market area should be addressed in local plans, working on a cross-boundary basis.

The City Council confirms that it wishes to continue to engage with the Vale of White Horse District Council on this and other matters, noting that the Duty to Cooperate applies on an on-going basis, and up until submission in the context of local plans.

Yours sincerely



Michael Crofton-Briggs
Head of City Development

¹ Oxford's Housing Land Availability and Unmet Need Assessment (Dec 2014)
(http://www.oxford.gov.uk/PageRender/decP/SHLAA_occw.htm)

² Travelling to Work: commuting patterns in Oxfordshire (<http://insight.oxfordshire.gov.uk/cms/travelling-work-commuting-patterns-oxfordshire>)

³ Oxford Strategic Growth Options: High Level Review of Opportunities
(<http://www.oxford.gov.uk/PageRender/decP/OxfordGrowthStrategy.htm>)