



**MATTER 2: UNMET HOUSING NEEDS FROM OXFORD**

**HEARING STATEMENT on behalf of Arnold White Estates Ltd**

**Examination of Vale of White Horse Local Plan 2031: Part 2 - Detailed Policies and Additional Sites**

|                          |        |             |             |
|--------------------------|--------|-------------|-------------|
| <b>Project reference</b> | GP 006 | <b>Date</b> | 9 June 2018 |
|--------------------------|--------|-------------|-------------|

**Gardner Planning Ltd**

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

**07887 662166**

**[geoff@gardnerplanning.com](mailto: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 Hearing **Statement** submitted to the Inspector holding the Part 2 Examination of the Vale of White Horse **Local Plan (LP2)** 2031 in July 2018. 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 LP2 Publication Version on 20.11.17.
- 1.2 This Statement responds to the Inspector's List of Matters and Questions (15.5.18) which are a starting point for the round-table hearing session.

## 2.0 QUESTION 2.1

*How has the 2,200 working assumption for unmet housing needs from Oxford within the Vale been arrived at and is it supported by proportionate evidence?*

- 2.1 The figure was arrived at in September 2016 by the Oxford Growth Board. The Memorandum of Understanding<sup>1</sup> which is found at Appendix 2 of the meeting Agenda although a fuller report is at Appendix 1. After the Growth Board looked at Oxford's needs and its capacity to meet them, the LPAs agreed a total unmet need figure of 15,000 and following negotiation divided this up between the surrounding Authorities as follows:

|                        |        |  |  |
|------------------------|--------|--|--|
| Cherwell DC            | 4,400  |  |  |
| Oxford City Council    | 550    |  |  |
| South Oxfordshire DC   | 4,950  |  |  |
| Vale of White Horse DC | 2,200  |  |  |
| West Oxfordshire DC    | 2,750  |  |  |
| TOTAL                  | 14,850 |  |  |

- 2.2 This was not a sophisticated process. In any event, the largest contributor, South Oxfordshire, refused to agree the Memorandum of Understanding, and later reduced its contribution from 4,950 to 3,750<sup>2</sup>, a loss of 1,200 homes. There are no clear plans amongst the HMA partner authorities as how this shortfall is to be made up.

<sup>1</sup> DUC01

<sup>2</sup> Local Plan 2033 Publication Version Oct 2017 Policy Strat3: the unmet housing requirements from Oxford city

### 3.0 QUESTION 2.2

*What are the arrangements for reviewing or updating this working assumption?*

3.1 Unknown. However, as pointed out in Matter 1:

- Government/Oxfordshire has proposed a Growth Deal which includes an extra 100,000 homes in Oxfordshire
- in April 2018 the joint authorities (as part of the Oxfordshire Housing and Growth Deal) agreed the Oxfordshire Joint Statutory Spatial Plan Draft Statement Of Common Ground.
- The 'Final Report' by the NIC on the Cambridge/MK/Oxford Corridor envisages an extra 132,000 homes.

#### 4.0 QUESTIONS 2.3 - 2.5

*2.3 Is the spatial strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by proportionate evidence?*

*2.4 Is the stated strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area followed through in the LPP2?*

*2.5 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site – Dalton Barracks) and sites outside the Green Belt the most appropriate?*

- 4.1 These questions overlap with the 'reasonable alternatives' question 1.8 in Matter 1.
- 4.2 Without any further appraisal of higher-level strategy (Matter 1), the SA then moves onto the sub-regions, beginning with Abingdon/Oxford Fringe at para 6.2.5 onwards. These paragraphs are again about housing numbers but mentions "*constraints, in particular the Oxford Green Belt*" noting that "*There is a need to demonstrate 'exceptional circumstances' when releasing land from the Green Belt for development.*"
- 4.3 There is then reference to LPP1 Core Policy 8 (para 6.2.9) which is:

*Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area*

*Our over-arching priority for this Sub-Area is to maintain the service and employment centre roles for Abingdon-on-Thames and Botley and ensure growth is managed to minimise pressure on the highway network, whilst protecting the Oxford Green Belt.*

*Development in the Abingdon-on-Thames and Oxford Fringe Sub-Area should be in accordance with the Settlement Hierarchy set out in Core Policy 3:*

*Market Town: Abingdon-on-Thames*

*Local Service Centre: Botley*

*Larger Villages: Cumnor, Drayton, East Hanney, Southmoor Kennington, Kingston Bagpuize with Southmoor, Marcham, Radley, Steventon and Wootton*

*Smaller Villages: Appleton, Dry Sandford, Farmoor, Frilford, Longworth, North Hinksey, Shippon, South*

*Hinksey, Sunningwell, West Hanney and Wytham*

4.4 Reference is made (6.2.9) to the Sustainable Transport Study<sup>3</sup> (TRA05) which seems to have little reference to rail travel (except paras 2.4.20 - 2.4.26) noting that Radley Station is the only station in the sub-area. I will return to this study under matters 2, 4 and 5. Para 6.2.9 pt 3 and Fig 3 deal with emerging road corridors.

4.5 Three points emerge from LPP1 to guide growth:

- minimise pressure on the highway network
- protect the Oxford Green Belt
- locate growth according to the hierarchy

4.6 This 'balance' is not addressed in the SA. It assumes that all GB sites (except Dalton Barracks) are totally constrained by the GB thus favouring non-GB sites, regardless of the availability of sustainable travel, especially rail. Indeed, (on which the SA is based in part) states (emphasis in bold):

*2.4.20 Due to the location of Local Plan Part 2 allocations at Dalton Barracks, Kingston Bagpuize and Marcham, rail is **unlikely** to be considered as a high priority mode of travel for journeys within the sub-area.*

4.7 LPP2 states:

*2.21 The site selection process included considering all potential sites within the Oxford Green Belt and considering the likely impact of development on the Green Belt and has been informed by Sustainability Appraisal.*

4.8 The only 'likely impact' of development in the GB is whether a site is in the GB or not, and if it is then it is rejected.

4.9 The identified sites are dealt with in Matter 4 and Dalton Barracks is dealt with in more detail in Matter 5.

---

<sup>3</sup> TRA05

## 5.0 QUESTION 2.6 AND 2.7

*2.6 To what extent is the strategy for meeting these unmet needs deliverable in the necessary timescale?*

*2.7 To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?*

- 5.1 LPP2 is quite clear that the Oxford unmet needs must be accommodated in the Abingdon/Oxford Fringe Sub Area (letters in capitals are in the submission version):

*The Abingdon-on-Thames and Oxford Fringe Sub-Area is closest to and has the most frequent and reliable public transport linkages to Oxford WITH THE GREATEST POTENTIAL FOR FUTURE ENHANCEMENTS and for these reasons, the Vale's agreed quantum of unmet need for Oxford (2,200 dwellings) is allocated to this Sub-Area as set out by Core Policy 4A: Meeting Our Housing Needs.<sup>4</sup>*

- 5.2 The allocated sites are examined in Matter 4, where some assumptions about their suitability and deliverability are questioned in the relevant Statement, similarly Dalton Baracks is examined and questioned in Matter 5. It is proposed to accommodate 1,200 homes (55% of the total) in the Plan period yet the only published 'release date' by the MoD is 2029<sup>5</sup>. Studies by Litchfield<sup>6</sup> and Colin Buchanan and Partners<sup>7</sup> cast doubt on the ability of strategic or large sites to deliver housing quickly, and these will be referred to in Matter 5.
- 5.3 Future housing needs in Oxfordshire are likely to significantly rise within a short timescale as a result of the 'Growth Deal' (+100,000 homes) the 'Cambridge/Milton Keynes/Oxford Corridor' (+132,000 homes) mentioned in Matter 1. Such numbers, and the national priority to deliver them, will not await a post-plan period.

---

<sup>4</sup> LPP2 para 2.14 (as amended)

<sup>5</sup> OCD05 MoD 'A Better Defence Estate' Nov 2016 p24

<sup>6</sup> 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' Nathaniel Lichfield & Partners November 2016

<sup>7</sup> 'Housing Delivery on Strategic Sites Research Study' Colin Buchanan and Partners December 2005

## 6.0 QUESTION 2.8

*What are the arrangements for securing affordable housing to meet the needs of Oxford within this figure. Would they be effective and deliverable?*

6.1 No comment.



## 7.0 QUESTION 2.9

*How would the strategy for meeting Oxford's housing needs within the Vale be monitored to ensure its delivery? Is a housing supply ring fence for Abingdon and the Oxford Fringe sub area required*

- 7.1 It is for VWH to describe how it will monitor delivery, but given the importance of Oxford and its requirements for unmet housing needs to be fulfilled, and the importance of the Abingdon/Oxford sub area in this, it must be necessary for that monitoring to be rigorous. Only by ring-fencing the area, and Oxford's needs are comparable to the ring-fence of the Science Vale, would needs be met and adequately monitored. LPP2 states as follows (para 2.15), but if the second sentence is the 'justification' for this position then the reason is unclear:

*"The Vale is not seeking to Ring Fence allocations for the purposes of addressing the agreed quantum of Oxford's unmet need to be met within the Vale. The unmet need is met by a combination of the Part 1 strategic allocations and the Part 2 additional allocations."*