



GERALDEVE

EXAMINATION IN PUBLIC OF

Vale of White Horse Local Plan

Hearing Statement in respect of Hearing Session for Matter 2

On behalf of Merton College Oxford

Contents

	Page
1 Introduction	3
2 Matter 2: Unmet housing needs from Oxford	

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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?

The Policy Approach is Unsound

- 1.1 It is considered that 2,200 as a working assumption for unmet housing needs from Oxford within the Vale is unsound in respect of how it has been arrived at, and how it is supported in terms of proportionate evidence. In particular, it is considered that the Publication Version of the Local Plan: Part 2 is unsound in respect of NPPF paragraphs 158, 159, 178-182.
- 1.2 NPPF paragraph 158 states that: "*Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.*"

Not Positively Prepared:

- 1.3 The Publication Version of the Local Plan: Part 2 does not properly address the identified local development requirements, including that of neighbouring authorities where it is reasonable to do. According to the NPPF, in order to be thought of as '*positively prepared*' the Plan should seek to "*meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*"
- 1.4 As submitted, the Local Plan would not deliver the unmet housing requirements for Oxford, defined as Oxford's unmet housing need, in the most sustainable way.
- 1.5 Paragraph 47 of the NPPF states that '*to boost significantly the supply of housing*' LPAs 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;
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land;
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
 - for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for

the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and

- set out their own approach to housing density to reflect local circumstances.
- 1.6 Based on the above, it is considered inappropriate to include ‘housing completions’ within the projected number of houses to be delivered. This serves to distort the actual existing deficit of housing in the area and misrepresent the contribution of the proposed allocated sites to meet housing needs.
- 1.7 In conclusion, we would consider that the 2,200 working assumption for unmet housing needs from Oxford within the Vale of White Horse is unsound in terms of how it has been arrived at and how it is supported in terms of proportionate evidence and how that is monitored.

Question 2.2: What are the arrangements for reviewing or updating this working assumption?

- 1.8 The risk to the Vale of White Horse is what the outcome would be if the identified and allocated sites do not deliver the quantum of housing (within the Plan period) required to meet Oxford’s Unmet Need. In those circumstances, it remains unclear what arrangements would be in place to address this. Delivery on other sites ought to be considered in order to achieve the total number of homes to be delivered in order to address part of Oxford’s Unmet Need within the Vale of White Horse (2,200 homes). In order to track this, a constant monitoring system would need to be put in place to keep track of both current delivery and future deliverability of the quantum of housing required to meet the specific unmet need.

Question 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?

- 1.9 It is considered that the land at Cumnor previously identified in assessments as ‘Site 15 South West of Botley’ is a reasonable alternative that should have been taken forward into the Plan, particularly given the identification of adjacent land within draft Policy 12a(i) as a safeguarded Park and Ride site.
- 1.10 A key consideration of the alternative site at Cumnor is the benefits that it would offer in terms of proximity. This is in the context that some of the selected sites within the sub-area are located up to 15 miles away from Oxford City Centre with materially longer journey times. The requirement to travel significantly greater distances to these sites would lead to higher overall environmental, economic and social costs associated with meeting Oxford’s unmet housing need as close (distance and travel time) as possible to Oxford itself.
- 1.11 A Transport Study, prepared by WSP Parsons Brinckerhoff and submitted as part of our response to the Preferred Options consultation in May 2017, concluded that the

allocation of Merton College's land at Cumnor for strategic development would not only contribute to the Vale's apportioned quantum of housing to meet Oxford City's unmet need by 2031, but would also achieve broader transport objectives with regard to encouragement of further uptake of sustainable transport modes, thereby connecting communities with employment, education and leisure opportunities within both the Vale of White Horse and the rest of Oxfordshire when considered against the alternatives.

- 1.12 We consider that whilst housing for Oxford should ideally be located in Oxford, however given that it cannot be delivered within Oxford City's own boundaries; it should be located as close to where the need arises as possible. The submission Plan is not considered to meet this objective, being located a significant distance from the City Centre (up to 15 miles) and having a resultant journey time of up to 40 – 50 minutes by public transport.
- 1.13 Alternative sites, such as that at Cumnor, are closer to the City – where the housing need arises – and also offer equal or better accessibility by public transport compared to all other sites and would be further enhanced by the proposed safeguarded Park & Ride facility. There would be clear benefits to the deliverability and operation of the Park & Ride by developing the land as part of a wider housing scheme to provide homes to meet the unmet needs of Oxford. In this way, commuters into Oxford could walk to the Park & Ride to catch bus services into Oxford. This is sustainable and would provide quick total journey times into Oxford. It would also reduce vehicular journeys on the road network compared to alternative sites.

Question 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 release (one site – Dalton Barracks) and sites outside the Green Belt the most appropriate?

- 1.14 In terms of alterations to the Green Belt and the availability of potential sites, one of the sites proposed to be released from the Green Belt includes Dalton Barracks, but which is not likely to deliver any housing until the very far end of the Plan period.
- 1.15 The consideration of releasing sites within the Green Belt versus sites beyond the Green Belt must be balanced against the need to deliver housing to meet Oxford's unmet housing need sustainably. We consider that meeting Oxford's unmet housing need in accessible locations, with reliable transport linkages into the City Centre, and closer to Oxford, ought to be paramount in consideration of how best to meet that need.
- 1.16 All of the land surrounding Oxford is designated as Green Belt. As such, identifying additional sites in proximity to Oxford would necessitate the release of additional land from the Green Belt. Sites such as our client's land (previously identified as Site 15 'South West of Botley') should be released from the Oxford Green Belt and allocated for housing, alongside the proposed Park & Ride, to help meet Oxford's unmet housing needs. It is a sustainable location in close proximity to Oxford, and housing can be provided that is both sensitive to, and works within, the landscape alongside the

safeguarded Park & Ride site. Its availability (and acknowledged suitability in landscape terms by the Council for the land safeguarded for a Park & Ride facility) would indicate that the balance of sites may not be the most appropriate in terms of meeting Oxford's unmet housing need in the most appropriate and deliverable locations.

- 1.17 Landscape grounds seem to be the principle reason for discounting the site. The Site Selection Topic Paper associated with the Local Plan Part 2 scored the site as 'red' in respect of landscape, citing the strong contribution to Green Belt purposes and 'highly sensitive' nature of the site in landscape terms. This is at odds with the assessment commissioned and submitted to the Council in May 2017 as part of our response to the Preferred Options consultation.
- 1.18 Development at the site has the potential to minimise environmental impacts in the longer term as there would be extensive tree, shrub and hedge planting associated with housing which would result in the creation of an attractive 'woodland' setting without harmful impacts.
- 1.19 The Council's position and conclusion that the site is not suitable for residential development as a result of landscape considerations is unsound and is further compounded by the Council's allocation under Policy 12a(i) as a part of the site as a Park & Ride development site. The landscape in this part of the site has therefore been considered as not valuable and not worthy of safeguarding from development.
- 1.20 The Sustainability Appraisal concludes at Table B that South West of Botley is "Very well linked to Oxford, relative to other sites, and Botley is the second largest settlement in the Abingdon and Oxford Fringe Sub-Area. However, this site is not well related to Botley, and falls within a sensitive, open landscape within the Green Belt. Land rises across the site towards Hurst Hill, where the woodland is a SSSI." This would appear to be the basis upon which the site is ruled-out from further assessment within the SA for the purpose of establishing reasonable alternatives.
- 1.21 We agree that the site is very well linked to Oxford, and given that Botley is the second-largest settlement in the Abingdon and Oxford Fringe Sub-Area, consider that it is an appropriate area to provide housing to meet Oxford's unmet needs. Furthermore, we consider that the site is not isolated and development in this location would extend the built form. Our submissions to the Preferred Options and Publication Version of the Plan provide further detail in respect of this.
- 1.22 We consider the Council to be over-relying on the delivery of one single point of delivery within the Green Belt, in the form of the proposed development at Dalton Barracks, and which it is noted is unlikely to deliver until the latter part of the Plan period.

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

1.23 As set out within the response to Question 2.5, there is not sufficient flexibility built into the Plan for meeting Oxford's unmet housing need, particularly given the potential for over-reliance upon delivery at Dalton Barracks and Abingdon. Additional well-located sites, or reserve sites would ensure flexibility in this regard alongside a comprehensive strategy for monitoring of delivery and any necessary steps that may need to be taken to address shortfalls in housing delivery to meet Oxford's unmet housing need.

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

1.24 There does not appear to be flexibility in place for meeting Oxford's unmet housing needs if the working assumption figure is revised in the future. This would particularly be the case, and compounded, if any of the allocated sites do not deliver to help achieve the working assumption delivery figure as it currently stands. Consequently, there would need to be flexibility in terms of achieving this. It is unclear how the Council would deal with alternative sites that might be considered should the unmet housing need figure rise in the near or medium term.

Question 2.9: How would the strategy for meeting Oxford's housing needs within the Vale be monitored to ensure its deliverability? Is a housing supply ring fence for Abingdon and the Oxford Fringe sub area required?

1.25 The implementation of the plan should be monitored and reported against the policies and approaches, through the Authority's Monitoring Report.

1.26 Although it sets out some delivery and contingency plans within Section 4 (Implementing the Plan) Vale of White Horse District Council's Local Plan 2031 (Part 2) Detailed Policies and Additional Sites (October 2017) we have not had sight of a detailed monitoring programme that would allow transparency and help provide an indication of whether actions need to be undertaken in order to ensure deliverability.

1.27 It is considered especially important to ensure stand-alone transparency and visibility of precisely what housing is being delivered to meet Oxford's unmet need requirements, rather than housing to meet need arising from within Vale of White Horse so that the contribution of the District towards meeting that need can be accurately and reliably monitored.

1.28 We consider that it would be both pragmatic and sensible to have a monitorable ring-fenced approach for the housing to be delivered specifically to meet Oxford's unmet need within the Abingdon and Oxford Fringe sub-area, in addition to local housing needs generally arising within the sub-area.