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# Examination into the Vale of White Horse District Local Plan 2031: Part 1 Strategic Sites and Policies

Written Statement on behalf of Ptarmigan Planning Ltd. and Landowners

Hearing Statement: Matter 4

Respondent Reference: 873607

August 2015



**Examination into the Vale of White Horse District Council Local Plan 2031 Part 1:  
Strategic Sites and Policies**

**Written Statement on behalf of Ptarmigan Planning Ltd. and Landowners**

**Hearing Matter 4: Unmet Housing Needs**

**Respondent Reference: 873607**

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## **1.0 INTRODUCTION**

1.1 This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2011-2031: Part 1 on behalf of Ptarmigan Planning Ltd. and Landowners (hereafter referred to as 'our Client').

1.2 This statement refers to the following Issue, identified by the Inspector in her Matters and Issues:

- Matter 4 – Unmet Housing Needs

## 2.0 MATTER 4 – UNMET HOUSING NEEDS

### Issue 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?**

- 2.1 Policy CP2 and the preceding supporting text to the policy clearly present the position of the Vale of White Horse (VoWH) in addressing both its own objectively assessed housing need whilst further referencing the role of the Oxfordshire Growth Board in ensuring that the any unmet housing need across Oxfordshire Local Authorities is taken into due consideration in the preparation of Local Plans across Oxfordshire in accordance with paragraph 178 of the NPPF.
- 2.2 In addition, the influence that the Science Vale Area provides with regard to its economic national importance and the role of the City Deal in identifying and planning for the future economic and housing needs of Oxfordshire, ensures that VoWH are conscious of the relevant issues the District faces in providing for its anticipated employment growth and geographical location. This has ensured that the approach taken within the emerging Local Plan is justified by ensuring that sustainable development is achieved through continuing engagement with such stakeholders as required under paragraph 180 of the NPPF and addressing new and relevant information as it emerges.
- 2.3 At paragraph 1.18, the Plan acknowledges its role in co-operating on unmet housing need for Oxfordshire through the Joint Statement of Co-operation as part of the Oxfordshire growth Board and commitment to engaging constructively, actively and on an on-going basis. This is taken forward into Policy CP2 that commits VoWH, as is required under paragraph 179 of the NPPF, to continue to engaging with neighbouring authorities to ensure that the full objectively assessed need for economic and housing growth across the Oxfordshire market area is addressed and identifies the spatial options for identifying where unmet need may be accommodated.
- 2.4 Policy CP2 demonstrates that VoWH has committed to the Duty-to-Co-operate and have a clear intention to work collaboratively and continuously with neighbouring authorities and stakeholders, as required under paragraph 180 and 181 of the NPPF to address

strategic priorities and, if required, the mechanism by which VoWH will assist in accommodating such needs within its local authority area.

- 2.5 Given that Local Plan's, under paragraph 154 of the NPPF, should be '*aspirational but realistic*', in light of the existing evidence available with regard to housing need, VoWH has adopted an approach which seeks to deliver sustainable development based on a comprehensive understanding of its own strategic priorities over the plan period. In tandem, VoWH is ensuring that the Plan can respond 'flexibly to changing circumstances' (paragraph 153 of the NPPF), such as the increase in housing provision, through the inclusion of Policy CP2.
- 2.6 As discussed at Matter 2, VoWH has committed to meeting its full objectively assessed housing need over the plan period and through Policy CP2 has committed to, in the absence of the quantum of unmet housing to be accommodated especially from Oxford City, a provision for addressing any housing overspill in the future when such information materialises which will be identified through the on-going co-operation with aforementioned stakeholders. As such, prior to submission of the Local Plan for examination, VoWh has demonstrated cross-boundary co-operation and agreed to a memorandum of understanding with the Oxfordshire Growth Board as required under paragraph 181 of the NPPF who are working towards identifying the unmet need of Oxford City and distribution of housing across neighbouring Oxfordshire authorities.
- 2.7 It is evident that through the Local Plan, VoWH has been reasonable in its approach to identifying - as far as reasonable - strategic locations for its own needs, with provision for planning for any identified unmet needs that may need to be accommodated later within the plan period. As the quantum of unmet need, especially from Oxford City, is unknown, VoWH are justified in their approach for making provision with Policy CP2 for this to be addressed and moreover ensuring that a plan is pursued that meets its own full identified housing need in the interim. This position ensures that VoWH has considered both currently identified growth and allowing for any projected future housing need that may arise through the Oxfordshire Growth Board which is supported through paragraph 181 of the NPPF.
- 2.8 As such, policy CP2 is considered to be soundly based, meeting the requirements of paragraph 182 of the NPPF. Any alternative approach at this stage, in the absence of understanding the exact unmet needs of Oxford City, would delay the adoption of the Plan and inhibit the delivery of much need housing and economic growth to meet the

needs of VoWH. The approach adopted by VoWH provides sufficient certainty and was accepted by the Inspector at the Cherwell Local Plan Examination.

**Issue 4.2: What is the likely timescale for agreement being reached between the relevant authorities on (i) the scale of unmet needs in Oxford City (and any other district (ii) the most appropriate way of any unmet needs being provided for?**

- 2.9 Paragraph 14 of the NPPF requires that *'local plans should meet objectively assessed needs, with sufficient flexibility to avoid rapid change'*. The Plan seeks to provide for its full objectively assessed needs whilst making provision in the future for any unmet housing need/ housing overspill from Oxford City. Paragraph 1.21 of the Local Plan sets out that it is likely that a period of 12-18 months is required before a comprehensive understanding of the unmet needs in Oxford City is identified and the most appropriate and effective way of distributing the housing overspill between the Oxfordshire authorities is determined.
- 2.10 Since the submission of the Local Plan: Part 1 to the Inspector, the Council has committed to testing a range of potential scenarios to identify areas where Oxford City's unmet housing need could be accommodated (Appendix 1 – VoWH Cabinet Meeting dated: 7<sup>th</sup> August 2015). Given the Inspector at the Cherwell Local Plan Examination indicated that the mid-point of the Oxfordshire SHMA is a sound approach, there is some precedent for VoWH planning for an additional 3,000 homes. However this needs to be fully tested before VoWH proceed to identifying the specific quantum of unmet need that should be apportioned to the VoWH and subsequently where additional housing could be accommodated. The intention of the Council is for the testing to indicate the most appropriate sub-area for accommodating the unmet need and highlights VoWH commitment through the Duty-to-cooperate to assist Oxford City in meeting unmet housing need.
- 2.11 In light of the above, it would be considered appropriate for Policy CP2 to include a timeframe for when the review – either full or partial – needs to be undertaken. This could be for commencement within 2 years of adoption given the current expected timeframes identified through the Oxfordshire Growth Board for the unmet needs to be identified and in light of the scenario testing to be undertaken by VoWH **or if delayed**, for the review to commence within six months of the unmet need being identified. This approach would ensure that there is sufficient provision within the plan to ensure that the VoWH are committed to pro-actively identifying additional capacity across the District



once the outcome of the additional housing requirement and the scenario testing are known. This will deliver a positively prepared plan that ensures that once identified, the delivery of the unmet need is time critical and ensuring that, if adopted, the Plan can be effective in delivering its full objectively assessed needs of both its own housing requirements and neighbouring authorities of the plan period in line with paragraph 182 of the NPPF.

- 2.12 Ultimately it is for VoWH to identify the potential timescales for understanding the quantum of unmet need to be accommodated within the District through its on-going engagement with the Oxfordshire Growth Board and thus to identify locations for additional housing provision for any unmet need at the earliest opportunity within the plan period.

**Issue 4.3: Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?**

- 2.13 The spatial strategy of focussing additional development at the Science Vale and proportionately through the settlement hierarchy seeks to meet the full objectively assessed needs of the District and is considered to be an appropriate strategy given the most up-to-date evidence base and sustainability appraisal as required under paragraph 47 of the NPPF which will seek to significantly boost housing supply to meets its District-wide housing need.
- 2.14 Once the scale of unmet need for neighbouring authorities is identified, it is likely that particular policies within the Plan would need to be revised to reflect the elevated housing requirements. However, in light of the above strategy, it would be questionable as to whether the overall strategic approach to the plan would need to significantly altered.
- 2.15 Such an approach is supported at paragraph 153 of NPPF and would be considered clearly justified given this would:
- Provide flexibility within the Development Plan to provide a Site Allocations DPD identifying additional sites for development to meet any unmet needs of neighbouring authorities;
  - Provide a focussed change in the strategy without undermining the overarching strategy included within Part 1 of the Plan; and

- Allow for the Local Plan to be kept-up-date in light of emerging evidence.

- 2.16 More recently, VoWH has committed to testing a range of scenarios to meet any unmet need for Oxford City in line with draft spatial strategies set out within Local Plan Part 1 focussing on testing options for additional housing growth within the main sub-areas identified at Core Policy 3. Whilst this will be a high level assessment, it indicates the intention of VoWH to identify whether additional housing can be allocated within the spatial strategy of Local Plan Part 1.
- 2.17 However, notwithstanding the above, in the event that the scale of the unmet need is considerably higher than can be considered within the existing strategy of Local Plan Part 1, it may then be necessary for VoWH to undertake a more comprehensive review of Local Plan Part 1 to evaluate whether an alternative strategy would be more appropriate in the first instance. This position would need to be determined once the quantum of development is known and is therefore not a matter which can be pre-determined or pre-empted in the context of this Examination. The NPPF provides the framework for this process and therefore this matter is considered not to be something that could not be adequately addressed with the current approach being taken by VoWH.

**Issue 4.4: If you contend that the approach set out in policy CP2 is not soundly based should the Local Plan be delayed pending agreement on 5.2 (i) and (ii) above or could modifications to the plan be made to make it sound?**

- 2.18 Barton Willmore on behalf of our Client is not of the view that the Plan is unsound given that it is the most appropriate strategy in light of the unmet need of Oxford City being unidentified at present. VoWH has sought to ensure that the strategy through Policy CP2 is effective in being able to fully address its own needs and identify its willingness to address its proportion of unmet need from Oxford City in the future once identified through complying with the Duty-to-Cooperate and committing to engaging through the Oxfordshire Growth Board. This approach was considered appropriate and sound by the Inspector at the Cherwell Examination on the basis that the Local Authority had undertaken a firm commitment to playing its part in addressing any needs of Oxford City in the future.
- 2.19 Overall, the approach taken is considered to incorporate a level of flexibility to accommodate changing circumstances over the plan period and as such under paragraph 182 is considered 'sound' in this regard.

- 2.20 If in the event the Inspector is of the view that the provision made to addressing unmet housing need within Policy CP2 is unsound, then an appropriate suspension may be considered the most effective and timely option in bringing forward a plan without substantial delay, as has recently been identified by the Inspector at the Arun District Local Plan Examination.

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