
VALE OF WHITE HORSE DISTRICT

LOCAL PLAN 2031

EXAMINATION IN PUBLIC

RESPONSE OF BARTON WILLMORE

(ON BEHALF OF RADLEY COLLEGE & KIBSWELL HOMES)

TO MATTER 4: UNMET HOUSING NEEDS

August 2015

**VALE OF WHITE HORSE DISTRICT
LOCAL PLAN 2031
EXAMINATION IN PUBLIC**

**RESPONSE OF BARTON WILLMORE (ON BEHALF OF RADLEY COLLEGE & KIBSWELL
HOMES) TO MATTER 1: DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS**

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Matter 4: Unmet Housing Needs

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?*

- 1.1 Yes. Radley College and Kibswell Homes are satisfied that the approach taken in Core Policy 2 is sound and in accordance with national planning policy.
- 1.2 Core Policy 2 clearly explains the Council's intention to fulfil its statutory duty to cooperate by working effectively with all of the other Oxfordshire Local Authorities. It confirms the Council's objective to firstly meet its own needs, while the extent to which Oxford City can meet its own needs is robustly tested and agreed. In doing this the needs of the housing market area as a whole can be met as quickly as possible.
- 1.3 Core Policy 2 appropriately references the role of the Oxfordshire Growth Board and commits to either an early or focused review of the Local Plan, or the allocation of appropriate housing sites through a subsequent DPD. This will ensure conformity with the Spatial Strategy set out in the Local Plan 2031, should it transpire that any unmet need is to be accommodated in the Vale.
- 1.4 The Council's approach is considered logical and appropriate and fully compliant with national policy, specifically paragraph 178 of the National Planning Policy Framework (NPPF) which requires public bodies to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156 of the NPPF (which includes, inter alia, the homes and jobs needed in the area). Core Policy 2 is also compliant with the objectives of paragraph 179 of the NPPF which states that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met in their own areas, for instance, (as is seemingly case with Oxford City), due to a lack of physical capacity.
- 1.5 Core Policy 2 serves to demonstrate that the Council are actively seeking to fulfil its statutory obligations under the Duty to Cooperate, and that there is a clear intention to work collaboratively and continuously with neighbouring authorities and stakeholders, as required under paragraph 180 and 181 of the NPPF.
- 1.6 The Council has sought to identify a range of strategic locations to meet its own needs, which has necessitated, given the level of required growth, the proposed release of sites from the Green Belt and development within the AONB. In addition to doing so the Plan

appropriately makes provision, via Core Policy 2, to plan for a further proportion of new housing arising from Oxford City's unmet housing need. On the basis that this figure remains untested and is yet to be confirmed, Radley College and Kibswell Homes are of the view that it is entirely reasonable and pragmatic for the Council to set out options for delivering this unmet need in the future, while positively planning to accommodate its own growth needs in the intervening period. This approach is considered to be reflective of good and positive planning, and consistent with the requirements of paragraphs 178 – 181 of the NPPF ('Planning Strategically across Local Boundaries').

- 1.7 Radley College and Kibswell Homes suggest that Core Policy 2 is sound and fully compliant with national policy. To adopt 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 needed housing and economic growth to meet the needs of the Vale of White Horse district. The approach adopted by the Council is considered to provide sufficient certainty. It is also relevant to note that such an approach was accepted by the Inspector at the recent Cherwell Local Plan Examination.

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?*

- 1.8 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. This timescale is also cited in the Council's recent report to Cabinet '*Planning to address Oxford Unmet Housing Need in the Vale of White Horse*' dated 7th August 2015 (**Appendix 1**), wherein it is stated at paragraph 5 that:

In November 2014 the Oxfordshire Growth Board endorsed the principles of a proposed strategic work programme to quantify and apportion Oxfordshire's unmet need, for each district to then address in their own way through their own Local Plan processes. The agreed principles are.... (v) A wish that the timescale for completing the review will be 12 – 18 months and that this should not hold up Local Plan timescales.

- 1.9 The Cabinet report expresses a commitment to testing a range of potential scenarios in order to establish where an appropriate proportion of Oxford City's unmet need could be accommodated. The report further indicates that given the Inspector at the Cherwell Local Plan Examination indicated that the midpoint of the Oxfordshire SHMA is a sound approach to

ascertaining what this proportion should be, there is 'some precedent' for the Vale of White Horse District to be required to deliver a further 3,000 homes. The report emphasises that this is still to undergo rigorous further testing, and that the planned work and process to get to a position where the numbers and broad locations for further growth are planned reflects the requirements of the legal Duty to Co-operate on plan making.

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?*

1.10 No. It is considered unlikely that the overall strategic direction of the Plan would need to be significantly altered in order to accommodate unmet needs from elsewhere in Oxfordshire. Clearly there are likely to be some revisions required in order to take due account of the uplift in overall housing numbers, but a wholesale review of the spatial strategy – which is considered entirely appropriate and supported with a robust evidence base including a full Sustainability Appraisal and an up to date assessment of objectively assessed need - is not considered probable; unless it transpires that the scale of the unmet need is such that a more comprehensive review of the Plan as a whole is necessary in order to understand whether an alternative strategy would be appropriate.

1.11 Paragraph 153 of the NPPF advises that Local Plans can be reviewed 'in whole or in part to respond flexibly to changing circumstances' – Core Policy 2 and the commitment to an early review *or* additional allocations within the spatial strategy set by the Local Plan is consistent with this guidance.

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 [sic] (i) and (ii) above or could modifications to the plan be made to make it sound.*

1.12 Radley College and Kibswell Homes consider that the approach in CP2 is soundly based and that the spatial strategy within the Plan is the most appropriate for delivering the Vale of White Horse district's own objectively assessed needs. As set out in our responses to the earlier questions, the commitment to an early review or the allocation of additional sites to absorb an appropriate and as yet untested proportion of Oxford City's needs is considered entirely consistent with national policy, and, indeed, the approach taken at the Cherwell Local Plan Examination. Core Policy 2 clearly sets out the Council's intent to fulfil its statutory obligations under the Duty to Cooperate and contains the requisite flexibility to respond to changing circumstances, i.e. the requirement moving forwards to delivering additional housing that cannot be accommodated within Oxford City's physical boundaries.

- 1.13 Radley College and Kibswell Homes do not consider that any modifications to Core Policy 2 are necessary at this time and we would reiterate our view that Core Policy 2 and the Plan as a whole is sound when considered against the relevant tests.