
Examination into the Vale of White Horse District Council Local Plan 2013 Part 1: Strategic Sites and Policies

Written Statement on behalf of The University of Oxford

Hearing Statement: Matter 4

Respondent Reference: 729199

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 the University of Oxford

Hearing Matter 4: Unmet Housing Needs

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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 the University of Oxford (hereafter referred to as 'the University').

1.2 This statement refers to the following Issue, identified by the Inspector in his 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 At paragraph 1.18, the Plan acknowledges the District's 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 Core Policy 2 (CP2) that commits the Council, as is required under paragraph 179 of the NPPF, to continue 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. Whilst the University is broadly supportive of this approach, the role of Botley needs to be considered given its location within the County (adjacent to Oxford City) and its linkages to the city itself. Opportunities to deliver non-strategic sites should not be overlooked at this stage. Development of strategic sites (i.e. over and above 200 units) may take time to deliver and there is a clear role for the smaller proposals in delivering this short term need.
- 2.2 The Council has committed to meeting its full objectively assessed housing need (OAN) over the plan period. Through Policy CP2 it has committed to addressing any housing overspill in the future (in particular from Oxford City) once the quantum (and resultant distribution) of that unmet need is identified.
- 2.3 The University considers that the Council has been reasonable in its approach to identifying, as far as possible, strategic locations for development to meet its own needs as well as the means for accommodating any identified unmet needs. However, the University considers that further consideration and recognition should be given to the role that non-strategic sites can play in meeting both the needs of the District itself and the unmet needs of adjoining authorities. Smaller sites can generally be brought forward at a quicker rate, with on site completions soon after commencement. An example of this is Hazel Road in Botley. Recognition should be given to the role that Botley can play in meeting those unmet needs in particular given its proximity to Oxford City (from where the unmet need will come). Hazel Road is a non-strategic site that could come forward at an early stage in the plan, contributing towards the

current housing land supply deficit and ensuring ongoing delivery from the outset of the plan period.

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?

- 2.4 Paragraph 1.21 of the Local Plan states that a period of 12-18 months is likely to be required before a comprehensive understanding of the unmet needs in Oxford City can be identified and the most appropriate and effective way of distributing the housing overspill between the Oxfordshire authorities be determined.
- 2.5 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 – Vale of White Horse Cabinet Meeting dated: 7th 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 the Council planning for an additional 3,000 homes as their proportion of the unmet need. This needs, however, to be fully tested before the Council proceed to identifying the specific quantum of unmet need that should be apportioned to the District and subsequently where additional housing could be accommodated, albeit the University considers that Botley should be given recognition within the plan to the role that it can play in accommodating some of that additional housing in close proximity to Oxford City.
- 2.6 The Council's intention is to indicate the most appropriate sub-area for accommodating the unmet need and highlights the Council's commitment to assist Oxford City in meeting their unmet housing need. The University consider that this spatial distribution should, in any scenario, include Botley.
- 2.7 The Local Plan should clearly identify the timescale 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 either through a partial review of the Local Plan or through allocations through a subsequent DPD.

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?

2.8 Once the scale of unmet need from the 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, the University does not consider that it would be necessary for the overall strategic approach to the plan to be significantly altered, subject to the identification at this stage of Botley as a suitable location for such additional development.

2.9 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, depending on the scale of the unmet need to be accommodated by, for example, increasing housing numbers to the various sub-areas without fundamentally changing the overall distribution ratios. This would not undermine 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.

2.10 However, notwithstanding the above, the University considers that the Council should recognise the role that smaller sites (those under 200 homes) can play in meeting the development needs and that they should not be discounted from consideration within Local Plan Part 1 and deferred to Part 2 when the site allocations will be prepared. The Council has set an arbitrary level of 200 homes as the threshold for consideration within Part 1 of the Local Plan and this should be reviewed in light of the contribution that smaller sites can play both in relation to the timescales for bringing forward non-strategic sites to delivery and the mix of development that non-strategic sites can offer in close proximity to existing services and facilities. This would also further ensure that the plan would not need to be significantly altered to accommodate the unmet need.

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 4.2 (i) and (ii) above or could modifications to the plan be made to make it sound?

- 2.11 Barton Willmore on behalf of the University of Oxford is not of the view that the Plan is unsound and consider that Policy CP2 is the most appropriate strategy in light of the unmet need of Oxford City being unidentified at present. The Council has sought to ensure that the strategy 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.
- 2.12 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. The University does, however, consider that further recognition should be given to the role that Botley can play in meeting the unmet need from Oxford City and that smaller sites should not be excluded from consideration at this stage.
- 2.13 The approach adopted by the Council is the same as that of Cherwell District, where the Local Plan was found to be sound with the Inspector noting that the Local Authority had undertaken a firm commitment to playing its part in addressing any needs of Oxford City in the future. However, in order to ensure that the unmet need is addressed in a timely manner it is 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 **or, if delayed**, for the review to commence within six months of the unmet need being identified
- 2.14 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 the identification of additional development sites through Main Modifications may be considered the most effective and timely option in bringing forward a plan without substantial delay.

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