

## Vale of White Horse Local Plan 2031: Part 1 - Examination

### Statement from the Oxford Green Belt Network

#### (relating to Matter 4 - Unmet Housing Needs (addressing all 4 questions))

The Oxford Green Belt Network contends that Core Policy 2 - Unmet Housing Needs - is not soundly based, for the following reasons:

1. Core Policy 2 refers to “the objectively assessed need for economic and housing growth across the Oxfordshire housing market area”. But we question the supposed objectivity of this need on the grounds that the economic growth on which the housing figures rely is aspirational and unrealistically high, deriving in part at least from the desire of the Local Enterprise Partnership and other bodies to tap into sources of government funding.
2. The Oxfordshire SHMA proposes an increase of 28,000 new dwellings in Oxford City by 2031 but this is so far in excess of the 8,000 planned for by 2026 in the adopted Core Strategy as to raise doubts over the City’s actual needs. If circumstances have changed so much since the Oxford Core Strategy was adopted as recently as 2011, this surely calls for a review of that Core Strategy in order that this huge increase in housing need can be tested and, if it is found to be excessive, the figures reduced accordingly. The City Council is resisting such a review which suggests to us that it is fearful that its growth ambitions might be undermined.
3. Last year the City Council produced a draft SHLAA which looked at the City’s capacity to find the land required to meet its housing needs. This study was heavily criticized by three District Councils (the Vale, Cherwell, and South Oxfordshire) who concluded that the true figure for Oxford’s capacity could be potentially as much as 50% higher. This level of uncertainty over site availability casts further doubt over the true level of Oxford’s needs and the City’s ability to meet them within its own administrative boundary.
4. Core Policy 2 observes that “Oxford City **may not** (our emphasis) be able to accommodate the whole of its housing requirement ....within its administrative boundary”. It goes on to refer to work being carried out to identify and agree the level of need. It is our view that such is the uncertainty surrounding the City’s needs that no Policy commitment should be entered into by the Vale, or any of the other Districts for that matter, to meeting these unverified needs until the investigations have been completed.
5. Core Policy 2 offers a number of scenarios for meeting the City’s need if it is

identified. These possible approaches have spatial implications, not least for the Green Belt which is our major concern, and we suggest that the degree of uncertainty over a possible future way forward is such that this Policy cannot be said to be soundly based despite the Council's wish to be seen to be carrying out its duty to cooperate.

It is a pity that the Local Plan is being subject to Examination whilst the questions about Oxford City's needs are unanswered. We do not feel that it is for us to suggest whether the Local Plan should be delayed or not pending agreement, but we do suggest that it would be inappropriate to adopt Core Policy 2, implying a large measure of commitment to meeting Oxford City's needs, until such time as an actual level of need is proven and accepted by all the Districts making up the Local Growth Board. As it is, Core Policy 2 appears uncritical and open-ended in its commitment to meeting whatever the City wants. It also strikes us as unwise when the Vale's own needs are still under Examination.

Ian Scargill  
Chairman, Oxford Green Belt Network  
13<sup>th</sup> August 2015