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Cllr Matt Barber
Leader of the Council
Vale of White Horse District Council

6th October 2015

Dear Matt

Vale of White Horse Local Plan Examination in Public (EiP)

Thank you for your letter dated 25 September. It would certainly be our preference to be able to jointly agree a workable programme that will secure some proportion of Oxford's unmet housing needs in the Vale Local Plan. Our thoughts on how this could be achieved are set out below.

Draft Policy CP2

You made reference in your letter to the report from the Inspector at the Cherwell District Council's Local Plan Inquiry which required an early review as the basis for the approval of the Plan. At that Inquiry, your Council, together with all the other Oxfordshire authorities gave a commitment to carry through the agreed process for the joint post-SHMA work, and that this process would be completed in eighteen months. This would allow a Local Plan review for Cherwell at that point. Keith Holland, a senior Planning Inspector and the 'critical friend' that we all selected to support the process, has confirmed that the process could be completed within eighteen months. The Cherwell Inspector accepted this timescale, and we would propose that the same period should be adopted for the Vale. There does not seem to be a good reason for extending the timescale to two years.

It is not correct that the quantum of Oxford's unmet housing need is not known. The housing needs figures in the SHMA have been accepted, and the City Council has a Local Plan and a SHLAA which are NPPF and PPG compliant. This has been confirmed in a number of recent inquiries and examinations, where challenges on behalf of the Vale have failed. The joint analysis of needs that is being undertaken under the aegis of the Growth Board is progressing steadily, and the report on the contribution of Green Belt land to NPPF green belt purposes is due shortly. There have been some delays to the programme caused by equivocation over the process from the Vale and SODC, and unfortunately, the site information that was scheduled to be presented six months ago has still not been submitted.

Therefore, should the Inspector be minded to progress the Local Plan to adoption on the basis of a modified Policy CP2, the City would propose that an 18 month timescale should be applied to the adoption of your Plan, rather than the submission. It is only at the point of adoption that it becomes part of the development plan, and cannot subsequently be withdrawn.

It is vital for the City that we should have a high degree of certainty about the delivery of the unmet housing need, as we are already suffering badly from the delay in meeting needs that were identified a decade ago and have been growing fast in the intervening years. For that reason, we would want to set a clear timescale within which your Local Plan would explicitly incorporate Oxford's unmet need; the suggested reliance on a five year land supply requirement would be too loose and uncertain in its effects. It could certainly not be guaranteed to provide much needed homes for people working in Oxford.

Officers from the Vale have expressed a number of different views on the inclusion of sites that would meet Oxford's unmet need. There have been statements to the effect that sites have been identified and assessed in the SHLAA, and that your Local Plan strategy can accommodate these. On the other hand, there has been a statement that the sites have not been assessed and that the potential implications of doing so would have significant impacts on your strategy, which have yet to be considered. This ambiguity suggests that there would be merit in deferring consideration and determination of Part 1 of the Plan, so that this can be clarified, and a robust Local Plan can then be carried forward for adoption. In the case of Cherwell District Council, suitable sites have been identified and brought forward at the request of the Inspector to meet the additional housing needs within six months.

The City Council could not agree that the proposals in your letter would amount to an effective way of identifying and bringing forward sites that can address the city's manifest need for more housing, bearing in mind that:

- The likely quantum of that need to be met in the Vale is between 3000 and 4000+. There is also a further 1,000 homes for the Vale's own needs to be allocated in Local Plan Part 2 (LPP2). Thus, LPP2 would need to find sites for 20% to 25% of the Vale's total target, which would need to come forward in a 13 year period beginning in 2018. It does not seem to us to be sensible or appropriate to defer this scale of development need. It is clearly a strategic matter that should be settled in Part 1.
- The proposals leave no room to accommodate the outcome of the joint Growth Board work on assessing spatial options, which is due to report within the next few months. The current Plan proposals are entirely bound by the current Vale spatial strategy, which expressly excludes Oxford's housing needs.
- Your proposal indicates that the outstanding needs would be addressed within 2 years of the adoption of Part 1 of the Plan. Yet according to the LDS (OCD02), LPP2 is not due to be adopted until June 2018, so there is already proposed slippage beyond the two year deadline. This means it would be unrealistic to expect to begin to see any significant contribution to Oxford's current and future unmet need until 2020, pushing the delivery of meaningful numbers into the last third of the Plan period. We would contrast this slow pace with the outcome of the Inspector's approach at the Cherwell Inquiry which means that we are now working closely with Cherwell officers to bring forward sustainable housing developments that will directly address the city's needs.

An alternative proposal to guide future processes.

Eight years have elapsed since the Vale started their local plan review, but Oxford's current and future unmet need is still unresolved. We feel that these needs could be addressed effectively by working together in a concerted fashion with the common objective of producing a sound Plan within a six month period. I have already referred to the outcome of the Cherwell examination which saw, within a 6 month period (June-December 2014), additional strategic allocations being consulted on and embedded in the emerging Plan, this increasing their proposed housing supply by some 70%. The increase required in the Vale to address

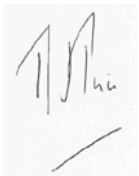
the unmet need is some 20-25%, and this could be achieved during a short suspension period in the following way:

- **October 2015** - Growth Board Spatial Options (including for Vale) to be shared with partners in October (Check and Challenge workshop on 30th Oct) including sites considered by VoWH
- **November 2015** - Vale-specific additional sites discussion between partners on basis of 3,000-4,500 homes to meet Oxford unmet need
- **November 2015** - meeting of Growth Board on 19th November to agree Oxford unmet need figure thereby providing further clarity on scale of additional housing in Vale
- **November 2015 - February 2016** - VoWH to prepare main modifications to LPP1 to amend Policy CP2 and other policies identifying the scale of Oxford need to form part of the minimum housing target and sites or areas for meeting Oxford unmet need, to incorporate DtC discussions with Growth Board partners and others
- **February 2016** - Growth Board joint work on evaluating strategic options on a county-wide basis completes thus refining the VoWH apportionment of unmet need
- **February - April 2016** - Public consultation on Main Modifications and accompanying SA Addendum
- **May 2016** - Examination hearings resume
- **Post-adoption** - LPP2 provides opportunity for neighbourhood plans to progress and full public consultation on precise sites and boundaries relating to areas identified for meeting Oxford unmet needs.

Your alternative approach implies a delay of three years or more; without a definitive Local Plan process and timetable there will continue to be no incentive to complete the Oxfordshire Growth Board programme. This will create uncertainty and is bound to increase the likelihood of damaging national and local economic growth prospects. As I have already indicated, the Vale is already six months late in providing sites for assessment through the agreed programme.

Against the background of the NPPF, it seems unreasonable for the Vale to be proposing to address Oxford's unmet need through a spatial strategy which excludes consideration of the city, and which relies on an oversupply of housing on sites that have not been considered against their ability to meet the city's housing needs on a sustainable basis. We would prefer to be able to work together with you through the Duty to Co-operate process that was agreed at the Growth Board following the SHMA. We would like to see that work based on sound sustainability principles that are aligned with the NPPF, and we judge that this could be achieved in a reasonable timescale before resuming the LPP1 examination next year. This would also enable other outstanding issues to be addressed over this period, including employment land supply, Green Belt review, and other considerations of housing land supply.

Yours sincerely



Cllr Bob Price
Leader