



**Vale
of White Horse**
District Council

Submission Version
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Local Plan 2031

Part 2

Detailed Policies and
Additional Sites

TOPIC PAPER 2

Site Selection
Addendum

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1.0 INTRODUCTION

- 1.1 This paper is an addendum to the Site Selection Topic Paper published alongside the Publication Version of the Local Plan 2031 Part 2: Detailed Policies and Additional Sites (referred to as the Part 2 plan). It provides an update to the topic paper to reflect those responses received to the Publication Stage (Regulation 19) of the Local Plan, in particular:
- It provides clarification on the spatial requirements for the Part 2 plan and the Council's approach to meeting its own housing need and its apportionment of Oxford's unmet need, and
 - It sets out a summary of the responses received from publicity period on the Publication Version of the Local Plan 2031 Part 2 and outlines proposed additional modifications responding to the responses received.
- 1.2 This Addendum should be read alongside the Site Selection Topic Paper published in October 2017.

2.0 SPATIAL REQUIREMENTS FOR LOCAL PLAN 2031 PART 2

- 2.1 A number of responses were received to the Publication (Regulation 19) stage, either raising concerns, or querying the approach taken. This section provides further clarity on the Council's approach to meeting the Vale's own housing needs and Vale's apportionment of Oxford's unmet need.

Meeting Oxford City's Unmet Housing Needs and Vale's Housing Needs

- 2.2 A number of representations recommended that greater clarity is needed to explain more clearly how the housing sites proposed within the Part 2 plan contribute towards Oxford's needs and why it appears the Council is planning to deliver a number of homes that exceeds the identified housing requirement for the district.
- 2.3 Core Policy 4a sets out the Vale's apportionment of Oxford's unmet need, of 2,200 dwellings, is added to the Vale's own housing need of 20,560 dwellings. This equates to a housing requirement of 22,760 dwellings to be delivered in the district up to 2031. The Council's approach to delivering its apportionment of Oxford's unmet need achieves a balance of ensuring dwellings are delivered close to and accessible to Oxford, and reflecting the reality that people have a choice in where they live and thus it is impossible to identify specific sites that will meet just a Vale or Oxford need, as highlighted by the Part 1 Inspector.
- 2.4 The Council's approach is therefore to add the Vale's apportionment of Oxford's unmet need to the Abingdon-on-Thames and Oxford Fringe Sub-Area housing requirement, but also demonstrate that there are sufficient sites located in this Sub-Area that are demonstrably close to and accessible to Oxford. This approach does not identify, or ringfence, specific sites, reflecting the reality that people have a choice in where they live. To ensure there is sufficient housing supply to meet the Vale's apportionment, the Council has proposed that allocations in the Part 1 and Part 2 plans meet the Vale's apportionment of Oxford's unmet need. This approach ensures both the district wide and the Abingdon-on-Thames Sub-Area housing requirements are met for Vale, whilst also meeting the Oxford need on sites close to and accessible to Oxford. Table 1 shows the housing requirements and supply for the district and for the Abingdon-on-Thames and Oxford Fringe Sub-Area.

Table 1: District wide and Abingdon-on-Thames and Oxford Fringe Sub-Area

Category	Number of Dwellings District Wide	Number of Dwellings in Sub-Area
Housing requirement for the full plan period (Apr 2011 to Mar 2031)	22,760	7,512
Housing Completions (Apr 2011 to Mar 2017)	4,680	2,051

Category		Number of Dwellings District Wide	Number of Dwellings in Sub-Area
Housing Supply (Apr 2017 to Mar 2031)	Known Commitments	3,061	1,401
	Local Plan 2031 Part 1 allocations	12,495	1,790
	Local Plan 2031 Part 2 allocations	3,450	2,020
	Windfalls	1,100	308
Total Supply		24,786	7,570
Over/under Supply		+2,026	+58

- 2.5 The approach ensures there is at least 2,200 dwellings allocated on sites that are close and accessible to Oxford to meet Vale's apportionment of Oxford's unmet need. In the Abingdon-on-Thames and Oxford Fringe Sub-Area, Part 1 and Part 2 allocations total 3,810 dwellings with a total of 2,860 dwellings located on sites (North of Abingdon-on-Thames, North West of Abingdon-on-Thames, North West of Radley, South of Kennington and Dalton Barracks) that are demonstrably close to and accessible to Oxford. In total this is 680 dwellings above the 2,200 requirement.
- 2.6 This clearly demonstrates that, whilst there is an oversupply of around 2,000 dwellings in the plan across the district, the margin within the Abingdon-on-Thames and Oxford Fringe Sub-Area is only 58 dwellings. This demonstrates the 2,020 dwellings proposed to be allocated in the Abingdon-on-Thames and Oxford Fringe Sub-Area in the Part 2 plan are required to meet the Sub-Area requirement and Vale's apportionment of Oxford's unmet need within this Sub-Area.
- 2.7 Representations also raised concerns regarding the approach, highlighting the original purpose of the Part 1 plan was to meet Vale's own housing need. Whilst the Council agrees that the primary intention of the Part 1 sites was to meet Vale's own need, some of those sites are well related to Oxford City and, as highlighted above, in reality, would be available to meet the needs of Oxford City. The Part 1 Inspector stated in his Final Report that:

'Notwithstanding the primary purpose of their allocation, housing on these sites would be available just as much to people falling with the category of Oxford's need as to those of the Vale. And in reality it would be all but impossible to determine if a potential occupier of this housing represents a Vale or Oxford 'housing need''¹.

and

'The two year deadline is appropriate having regard to both the time it is likely to take to identify and fully assess the allocations necessary to meet Oxford's housing needs and the fact that, in the meantime, the housing sites at

¹ Inspector's Report paragraph 25

*Abingdon-on-Thames, Kennington and Radley would be available for development and suitable to meet some of the city's unmet needs.'*²

- 2.8 The Council consider it is therefore entirely appropriate to consider the sites allocated in Part 1 will contribute to meeting a combination of both Vale need and the Vale's apportionment of Oxford's unmet need.

Housing Supply

- 2.9 The Adopted Local Plan 2031 Part 1 identifies sufficient supply to meet the Vale's own housing need of 20,560 dwellings. It identifies a total supply of 21,868 dwellings which comprises completions, commitments, Part 1 allocations, 1,000 dwellings coming forward through Part 2 and windfalls. A number of representations raised concerns about the original purpose of the 1,000 dwellings to be allocated in the Part 2 plan and whether the allocations in the Part 2 plan meet this purpose. Previous drafts of the Part 1 plan identified 1,000 dwellings to be allocated in the Part 2 plan on small scale (non-strategic) sites.
- 2.10 Although the draft Part 1 plan identified up to 1,000 dwellings to be allocated on smaller sites, it was amended by the Inspector before the Plan was adopted providing flexibility in meeting housing needs (Council's emphasis):

*'The two year deadline is appropriate having regard to both the time it is likely to take to identify and fully assess the allocations necessary to meet Oxford's housing needs and the fact that, in the meantime, the housing sites at Abingdon-on-Thames, Kennington and Radley would be available for development and suitable to meet some of the city's unmet needs. This implies adoption of a plan providing for Oxford's unmet housing needs some time in advance of the assumed 2021 "start date" for this provision. However, the Council has not, in the light of the Memorandum of Co-operation, indicated that it would wish for the two year deadline to be altered and the memorandum is clear that delivery of housing to meet these needs in advance of 2021 is not precluded. In the light of consultation responses, and so as not to inappropriately constrain future decisions on further allocations to meet outstanding housing needs, I have slightly amended MM1 to refer to the potential for the 'Part 2' plan to include **"additional" (instead of "smaller/local") development sites**. However, in advance of thorough assessment of all the potential sites to cater for this need, and bearing in mind the Memorandum of Cooperation's statement that the allocation of sites to meet Oxford's needs remains the responsibility of the "receiving" district, it would not be appropriate for the Part 1 plan to identify a preference for any particular areas or sites'*³

- 2.11 Reflecting the Inspector's Report, the Part 1 plan was amended and stated the purpose of Part 2 was to allocate 'additional' rather than smaller sites. The approach the Council has taken in the Part 2 plan is consistent with this and the

² Inspector's Report paragraph 30

³ Inspector's Report paragraph 30

Council has robustly assessed sites to ensure an appropriate strategy has been identified to meet the Vale's own housing needs and its apportionment of Oxford's unmet need. Nevertheless, the Council do recognise the importance of allocating a mixture of sites, including of different size, type and location, to help improve delivery, as evidenced in the 'Objectively Assessed Housing Needs'⁴ document. This is demonstrated in the total of non-strategic sites allocated; the Council is allocating 25 sites with 9 of these sites being non-strategic (200 dwellings or less) which equates to 36% of the sites allocated.

- 2.12 The Part 1 plan demonstrates there is sufficient supply to meet the Vale's own housing needs without any sites being allocated in the Part 2 plan. The total supply set out in Core Policy 4a and as highlighted above, is 21,868 dwellings. If the 1,000 dwellings, originally proposed for Part 2 is removed, there is still a supply of 20,868, i.e. a surplus of 308 dwellings.
- 2.13 Representations have raised queries regarding the proposed change to the windfall allowance and questioned the reliance on neighbourhood plans to bring forward housing. The Site Selection Topic Paper sets out the historic delivery rate the updated windfall allowance is based on, in accordance with National Policy and Guidance, thus providing compelling evidence (Table 2). In total, the windfall allowance equates to 1,100 dwelling over the remaining plan period which is approximately 4% of the total housing supply that the Council consider is modest.

Table 2: Completions on small housing sites

2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total
104	88	99	90	186	448	1015

- 2.14 To clarify, the updated windfall allowance is based on the historic delivery of smaller sites over the past 6 years. In addition to these smaller sites, several larger sites have also come forward as windfalls. If the historic delivery rate of these larger sites was included, the Council could consider demonstrating evidence for a significantly higher windfall allowance.
- 2.15 As demonstrated in the Site Selection Topic Paper, the past historic delivery rate is sufficient to justify the windfall allowance without any sites coming forward through neighbourhood plans. It is a matter for the bodies preparing neighbourhood plans to consider whether they allocate sites. The Part 2 plan simply recognises that sites may come forward through neighbourhood plans. It is however quite clear that the plan does not rely on these sites coming forward, especially as the total supply for the district exceeds the requirement by nearly an excess of 2,000 dwellings, as shown in Table 1 above.

Sub Area Requirements and Supply

2.16 Table 3 provides the housing requirements and supply for each of the Sub-Areas. The housing requirements for the Sub-Areas have been adjusted so the residual equates to the overall district housing requirement including Vale's apportionment of Oxford's unmet needs (i.e. 22,760 dwellings). Within the Part 1 plan, the total of the housing requirements for the Sub Areas was in excess of the district's overall housing requirement.

Table 3: Sub Area Requirements and Supply

Category		Abingdon-on-Thames and Oxford Fringe Sub-Area	South East Vale Sub-Area	Western Vale Sub-Area	District Wide Total
Housing requirement for the full plan period (Apr 2011 to Mar 2031)		7,512	12,150	3,098	22,760
Housing Completions (Apr 2011 to Mar 2017)		2,051	1,536	1,085	4,672
Housing Supply (Apr 2017 to Mar 2031)	Known Commitments	1,401	887	773	3,061
	Local Plan 2031 Part 1 allocations	1,790	9,055	1,650	12,495
	Local Plan 2031 Part 2 allocations	2,020	1,400	0	3,420
	Windfalls	308	484	308	1,100
Total Supply		7,570	13,362	3,816	24,748
Over Supply		+58	+2,121	+718	+1,988

2.17 As detailed above, in the Abingdon-on-Thames and Oxford Fringe Sub-Area, there is sufficient housing supply to deliver the Council's own need and the Vale's proportion of Oxford's unmet need with both housing allocations in Part 1 and Part 2 required to ensure this can be achieved.

2.18 In the South-East Vale Sub-Area, the supply of housing exceeds the housing requirement by over 1,000 dwellings. As detailed in the Sites Selection Topic Paper, the allocation of additional sites in Part 2 will further support the economic growth and acceleration of housing in the Science Vale area. The additional supply will assist the Council in maintaining a housing supply in the shorter term in the Science Vale area.

2.19 In the Western Vale Sub-Area, the Part 1 plan identified a need for the Part 2 plan to allocate 222 dwellings, however the Part 2 plan does not propose any additional allocations in this Sub-Area. As demonstrated in Table 2, the housing requirement for this Sub-Area has been met with an excess of supply

of 718 dwellings. There is sufficient housing supply to deliver the Council's housing requirement in the Western Vale and thus no need to allocate any further sites in the Part 2 plan.

3.0 SUMMARY OF PUBLICATION CONSULTATION

3.1 There has been two formal stages of consultation that have informed preparation of the Part 2 plan. These are:

- Preferred Options (Regulation 18) (March – May 2017)
- Publication Version (Regulation 19) (October – November 2017)

3.2 This paper provides a summary of the Publication Version stage of the process, as set out in Appendix A. A full summary of responses received can be found within Appendix 3 of the Regulation 22 Consultation Statement⁵, including responses relating to the Sustainability Appraisal.

Proposed Modifications

3.3 Responses received through the Publication Version stage has led to the identification of Proposed Additional Modifications to the plan, which are set out within the Schedule of Proposed Additional Modifications⁶. There are five proposed modifications relating to the Site Development Templates and the site requirements, these are AM21 to AM26.

⁵ Regulation 22 Statement, available to view and access at <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2>

⁶ Schedule of Proposed Additional Modifications, available to view and access at: <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2>

Appendix A: Summary of consultation responses related to the site selection process

Category	Summary	Council Response
Assessing Sites	A number of comments raising concern over the discounting of sites. This included questioning whether evidence submitted through the Preferred Options consultation had not been considered appropriately.	As detailed in the Site Selection Topic Paper, the Council follow a robust site selection process informed by several evidence base studies in accordance with national policy and guidance.
Evidence	A number of comments raising concern over the reliability and consistency of evidence including suggesting sites have not been tested consistently including adequate provision of infrastructure	As detailed in the Site Selection Topic Paper, the Council follow a robust site selection process informed by several evidence base studies in accordance with national policy and guidance.
HELAA	A number of comments relating to the HELAA report and associated appendices highlighting minor errors.	The Council acknowledge there are minor errors within the HELAA and welcome comments in highlighting these. The Council has submitted an Errata to the HELAA correcting these errors.
Removal of North East of Marcham Site	A number of comments welcome the removal of the North East of Marcham site however the site promoters suggest there is no justification for its removal.	The North East of Marcham site was removed from the Plan as, at present, the Council does not have sufficient evidence to demonstrate that development would not have an adverse impact on the AQMA.

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