
VALE OF WHITE HORSE

LOCAL PLAN PART 2 EXAMINATION

MATTER 2: UNMET HOUSING NEEDS FROM OXFORD

For CEG

(Representor ID: 1096815)

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Matter 2 – Unmet Housing Needs from Oxford

- 2.1 **How has the 2,200 working assumption for unmet housing needs from Oxford within the Vale been arrived at and is it supported by proportionate evidence?**
- 2.2.1 The unmet housing need figure (2,200 dwellings) for Vale of White Horse District can only be a working assumption figure at this time. The Oxford Local Plan is yet to be tested at Examination, meaning that the overall level of unmet housing need to be accommodated in the surrounding Districts could increase.
- 2.2.2 South Oxfordshire District Council has not fully accepted its apportionment of the Oxford City unmet housing need (4,950 dwellings), and the South Oxfordshire Local Plan process has been delayed, adding further uncertainty.
- 2.2.3 The 2,200 working assumption figure should be treated as a minimum. This is because the outcome of the Oxford City Local Plan Examination may well be that the level of unmet housing need is more than 15,000 dwellings, and because there remains uncertainty over whether South Oxfordshire District Council will accept (or be forced to accept) the full apportionment of unmet need proposed by the Oxfordshire Growth Board back in September 2016.
- 2.2.4 The evidence that informed the 2,200 dwelling working assumption figure is considered robust and proportionate, in that it identifies general development areas best suited to meeting the unmet housing needs of Oxford City.
- 2.2.5 The work undertaken by the Oxfordshire Growth Board to arrive at the apportionment of Oxford City's unmet housing need is described in the 26th September 2016 Growth Board Papers, with Vale Officers part of the working group that commissioned and completed the relevant technical work.
- 2.2.6 A Spatial Options Assessment Project was central to the process, with City, District and County Council partners identifying the strategic options for testing. It was made clear at the time that the areas identified for development consideration were not '*precisely defined sites*', but to enable an effective assessment against some of the assessment criteria, the Councils and their consultants needed to define areas on a plan.
- 2.2.7 The areas shortlisted for development consideration were subject to comprehensive assessment, which took account of transport infrastructure; education impacts and needs; a full range of sustainability considerations; the contribution the areas make to the purposes of the Green Belt; and other factors including viability and deliverability.
- 2.2.8 The Growth Board's recommended apportionment of the Oxford City unmet housing need was directly based on the estimated capacity of the

development areas shortlisted as being best suited to meeting Oxford City's unmet housing need.

- 2.2.9 In the Vale of White Horse District, sites at Botley (550 dwellings), Cumnor (550 dwellings) and Abingdon North (1,100 dwellings) were 'shortlisted' – and hence the proposed (and then agreed) working assumption of 2,200 dwellings.
- 2.2.10 The Vale of White Horse District Council has indicated that the availability of Dalton Barracks to potentially contribute towards future housing needs was not known at the time of assessing and agreeing the apportionment of Oxford City's unmet housing need. Dalton Barracks, if considered appropriate and deliverable, effectively provides additional development capacity, alongside those development areas in the Vale shortlisted as being best suited to meeting Oxford City's unmet housing need.

2.2 What are the arrangements for reviewing or updating this working assumption?

- 2.2.1 It is assumed that this is a question initially for the District Council (and the Oxfordshire Growth Board).
- 2.2.2 The Publication version of the Local Plan Part 2 does not appear to address the matter. We note, however, the commentary in the Council's Sustainability Appraisal (September 2017), paragraph 6.2.4, which states – *'The agreed unmet need figure is considered firmly fixed at the current time. There are no plans to review the Oxford unmet need figure, or its apportionment, and the Vale has not been asked by any authorities to take any additional unmet needs'*.
- 2.2.3 This stance is of concern, given there remains considerable uncertainty over the extent of the unmet housing need arising from Oxford City, with the Oxford Local Plan yet to be examined. There is also uncertainty over the delivery of unmet housing need in South Oxfordshire District, given the delays in the Local Plan making process and South Oxfordshire District Council's refusal to fully accept the Growth Boards recommendations in relation to Oxford's unmet housing needs.
- 2.2.4 We consider that the Local Plan Part 2 should take the working assumption of 2,200 dwellings as a minimum figure, with contingency and flexibility in place to enable an early and effective response to any required increase in housing delivery (to meet a higher level of unmet housing need from Oxford City – either as a result of the unmet need being greater than 15,000 dwellings overall, or as a result of delivery issues in South Oxfordshire District).
- 2.2.5 A flexible Local Plan is also important to address any delivery issues with sites allocated, or proposed for allocation, in Vale of White Horse District.

2.3 Is the spatial strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by proportionate evidence?

- 2.3.1 The spatial strategy for the Abingdon on Thames and Oxford Fringe Sub-Area is clearly defined in the Local Plan Part 1. The spatial strategy seeks to focus housing growth at the Market Towns, Local Service Centres and Larger Villages. Appropriate development at Smaller Villages should be to help meet the local needs of rural communities.
- 2.3.2 We support this broad spatial strategy and agreed at the time of the Local Plan Part 1 Examination that it was the most appropriate spatial strategy, given reasonable alternatives.
- 2.3.3 Core Policy 2 provides a commitment to working jointly and proactively with all of the other Oxfordshire authorities to address any unmet housing needs, and confirms that Local Plan Part 2 will allocate sites to contribute towards Oxford's unmet housing need.
- 2.3.4 The Publication version Local Plan Part 2 reiterates the relationship between Local Plan Part 1 and Part 2 – *'The Local Plan 2031: Part 1 identified development site allocations and policies to 'fully' meet the objectively assessed development and infrastructure requirements for the Vale of White Horse District.'* (page 10, third paragraph). Further, *'...the Local Plan 2031: Part 2: Additional Sites and Detailed Policies sets out policies and locations for the new housing to meet the Vale's proportion of Oxford's housing need, which cannot be met within the City boundaries.'* (page 10, second paragraph).
- 2.3.5 It is reasonable to assume that in helping to steer the Oxfordshire Growth Board work, the Vale of White Horse District Council will have been mindful of the spatial strategy in the Local Plan Part 1 – to ensure that the development areas identified as being best suited to meeting part of Oxford's unmet housing need, were appropriate and deliverable in accordance with the Part 1 spatial strategy.

2.4 Is the stated strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area followed through in the LPP2?

- 2.4.1 We don't believe that it is.
- 2.4.2 The Local Plan Part 1 Inspector recognised that the Part 1 allocations around Abingdon, Radley and Kennington were allocated with the *'primary intention'* of meeting the Vale's own objectively-assessed need for housing (Inspector's Report, paragraph 25). The Inspector does continue by acknowledging that Oxford City believed these sites to be well-located to provide for some of their own unmet need (and indeed that in practice it was all but impossible to determine if a potential occupier of housing around

north Abingdon, Radley and Kennington represented a Vale or Oxford need), but nonetheless, the position at the time was that Local Plan Part 1 allocated sites to meet the Vale's needs, and Local Plan Part 2 would allocate the sites to meet the apportioned unmet housing need from Oxford City.

- 2.4.3 The Publication version Local Plan Part 2 seeks to completely flip the purpose of the four sites to the north of Abingdon allocated in the Local Plan Part 1. Allocated at the time to help meet the Vale's housing needs, the Local Plan Part 2 suggests that these sites will now be 'assigned' the role of meeting part of Oxford's unmet housing need, along with Dalton Barracks.
- 2.4.4 Dalton Barracks is not as well related to Oxford City as the 'best suited' development areas identified in the Oxfordshire Growth Board work. Further, any significant development at Dalton Barracks, adjacent to a Small Village, does not align with the spatial strategy set out in Local Plan Part 1.
- 2.5.5 Overall, the strategy proposed in the Local Plan Part 2 would result in much less new housing being delivered (that is suitable for meeting unmet needs arising from Oxford City), than was envisaged at the time the Local Plan Part 1 was examined and adopted.
- 2.5 Given the NPPF requirement for exceptional circumstances to be demonstrated for any alterations to the Green Belt and the availability of potential sites, is the balance of the strategy between Green Belt releases (one site – Dalton Barracks) and sites outside of the Green Belt the most appropriate?**
 - 2.5.1 To effectively meet the unmet housing needs of Oxford City, it is agreed that the new housing needs to be reasonably close to Oxford City and have good access to the City by sustainable means of transport.
 - 2.5.2 In the Vale, development areas with such characteristics will be in the Green Belt. This view is supported by the findings of the Oxfordshire Growth Board work, which identified three sites in the Vale (in the Green Belt) as 'best suited' to meeting part of the unmet housing need arriving from Oxford City.
 - 2.5.3 We believe that there are the exceptional circumstances for alternative (or additional) sites to be released from the Green Belt. Indeed, we believe this to be essential, to provide flexibility, in the circumstances where any proposed development at Dalton Barracks is subject to delay.
 - 2.5.4 In terms of the exceptional circumstances for release of Dalton Barracks from the Green Belt (as set out at paragraph 2.75 of the Publication version of Local Plan Part 2) it is questioned whether Dalton is a highly sustainable site, given that it is adjacent to a Small Village, on the opposite side of the A34 from Abingdon, and some distance from the proposed Park and Ride at Lodge Hill and the train station at Radley. Significant spending on

infrastructure may help make the site more sustainable – but it is not a sustainable site by virtue of its location.

2.5.6 The release of the land at Dalton Barracks from the Green Belt (well beyond the previously developed area), will have comparable impacts on the Green Belt to other options that are better located to meet Oxford City’s unmet housing need. Further, there are other options much better placed to take advantage of existing and planned infrastructure.

2.5.7 We would not agree that the Dalton Barracks site is compatible with the Spatial Strategy set out in the Local Plan Part 1.

2.6 To what extent is the strategy for meeting these unmet needs deliverable in the necessary timescale?

2.6.1 CEG control the land at North Abingdon allocated for development in the Local Plan Part 1. Within 10 months of the site being removed from the Green Belt (through Local Plan Part 1), CEG had secured outline planning permission, with good early progress now being made with the discharge of conditions and reserved matters applications.

2.6.2 We share many other participants concerns over the timely delivery of development at Dalton Barracks.

2.6.3 Setting to one side the question of whether the spatial strategy and suggested scale of development at Dalton Barracks is the most appropriate strategy given the reasonable alternatives, there are clear and significant risks in relation to timely delivery.

2.6.4 The review of the Defence Estate has been ongoing for many years, and at any one time there are a very large number of plans and programmes in place, with many inter-dependencies. Operations and uses being displaced from one site can only be relocated once other operations and uses elsewhere have been rundown or relocated.

2.6.5 It is a not criticism, just a simple fact, that plans and programmes that are so complex, have some so many inter-dependencies, and of course are subject to political influence, can slip, or indeed change.

2.6.6 Taking MoD Ashchurch as an example - the site was a strategic allocation in the Submission Joint Core Strategy (November 2014) and was expected to deliver 2,125 dwellings and 20ha of employment land over the plan period to 2031, plus a further 500 dwellings post-2031. However, in October 2016 confirmation was received from the Defence Infrastructure Organisation that there was a continued requirement for land within the MoD site for at least the next 10 years. As such, the MoD wished to retain all but the eastern section of the site.

2.6.7 This eastern area comprises of 15.8ha, which could be released for development from 2023/24 for approximately 400 dwellings.

- 2.6.8 The circumstances will of course vary from site to site, but this provides a clear example of the risks involved in placing significant reliance on large MoD site. The risk (and resultant issues) of course increase where there are no fall-back options (to meet Oxford's unmet housing needs), other than to undertake a further Green Belt review.
- 2.7 To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?**
- 2.7.1 The strategy for meeting unmet housing needs from Oxford City is not sufficiently flexible. If the working assumption figure is revised upwards, or there are delivery issues with Dalton Barracks, there are no alternative sites currently in the Publication version of the Local Plan Part 2 that could 'step in' and help meet the unmet housing needs of Oxford City.
- 2.7.2 To provide the flexibility required, and as intended at the time the Local Plan Part 1 was adopted, the Council should be looking to allocate sites best suited to meeting Oxford City's unmet housing needs in Local Plan Part 2. If there are subsequent delivery issues with any of these sites, the Council could then 'fallback', if needed, on the Local Plan Part 1 sites at Abingdon, Radley and Kennington, which are located in areas suitable for accommodating unmet housing need from Oxford City.