



GERALDEVE

EXAMINATION IN PUBLIC OF

Vale of White Horse Local Plan

Hearing Statement in respect of Hearing Session for Matter 3

On behalf of Merton College Oxford

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Matter 3: Overall housing provision in the plan and its distribution between sub-areas

Question 3.3: Taking the objectively assessed housing needs of the Vale and the unmet needs of Oxford together, is the overall housing provision in the LPP2, its distribution between sub areas and its various components, consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?

- 1.1 It is not considered that 2,200 as a working assumption for unmet housing needs from Oxford within the Vale is sound in terms of how it has been arrived at and how it is supported in terms of proportionate evidence. In particular it is considered that the Publication Version of the Local Plan: Part 2 is unsound in respect of NPPF paragraphs 158, 159, and 178-182.
- 1.2 NPPF paragraph 158 states that: **“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”**
- 1.3 The Submitted Plan does not properly address the identified local development requirements, including that of neighbouring authorities where it is reasonable to do. According to the NPPF, in order to be thought of as ‘positively prepared’ the plan should seek to **“meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.”**
- 1.4 As currently drafted, the Local Plan would not deliver the unmet housing requirements for Oxford, defined as Oxford’s unmet housing need, in the most sustainable way. The methodology presented in the Publication Version of the Local Plan is unsound. Planning Practice Guidance provides advice on methodological approaches to assessing housing need. Also, Paragraph 47 of the NPPF states that ‘to boost significantly the supply of housing’ LPAs should:
 - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

1.5 Having regard to national policy and guidance, it is not clear that the overall housing provision and distribution is the most appropriate, or supported by evidence as required.

Question 3.4: How would the overall provision of housing in the district be monitored to ensure delivery? Is the housing supply ring fence for the Science Vale area still relevant and necessary?

1.6 The implementation of the plan should be monitored and reported against the policies through the Authority's Monitoring Report.

1.7 As also noted in response to Question 2.9, it is considered important to ensure transparency and visibility of precisely what housing is being delivered to meet Oxford's unmet need requirements, rather than housing to meet general need arising from elsewhere within Vale of White Horse.

1.8 We consider that it would be both pragmatic and sensible to have a monitorable ring-fenced approach for the housing to be delivered specifically to meet Oxford's unmet need within the Abingdon and Oxford Fringe sub-area, in addition to local housing needs generally arising within the sub-area.