

**Vale of White Horse Local Plan 2031 Part 2**

**Examination Hearings**

**Written Statement by Vale of White Horse District  
Council in relation to**

**Matter 2: Unmet Housing Needs from Oxford**

**June 2018**

## **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?**

- 2.1.1 The Vale's proportion of Oxford's unmet need is supported by proportionate evidence as set out within the Council's Topic Paper 2: Site Selection (**TOP02.1**)<sup>1</sup>. The approach followed in Oxfordshire has been managed by the Oxfordshire Growth Board resulting in a Memorandum of Understanding (**DUC01**)<sup>2</sup> setting out an agreed way forward for dealing with unmet housing need for Oxford, and is considered to be fully consistent with national policy<sup>3</sup>.
- 2.1.2 The Growth Board published their Strategic Work Programme in July 2015, which made it clear that the Strategic Work Programme was designed to enable the Oxford authorities to satisfy the Duty to Cooperate and inform the apportionment between the Oxfordshire authorities.
- 2.1.3 The working assumption of 15,000 dwellings was informed by Oxford's Strategic Housing Land Availability Assessment (SHLAA)<sup>4</sup> and a critical review of Oxford's SHLAA published in the Cundall Report<sup>5</sup>. The Oxfordshire Growth Board agreed to the working assumption in November 2015. The Council consider the 15,000 is based on proportionate evidence and provides an appropriate starting point for determining the apportionment between the Oxfordshire authorities<sup>6</sup>.
- 2.1.4 Following the agreement on the working assumption of 15,000 dwellings, the Growth Board commissioned an Oxford Spatial Options Assessment (**HOU08**)<sup>7</sup> to assist the Growth Board in determining how the 15,000 dwellings should be apportioned between the Oxfordshire authorities. The assessment was informed by a suite of evidence, including a Strategic Green Belt Study and Education and Transport Assessments.
- 2.1.5 The Oxford Spatial Options Assessment (**HOU08**)<sup>8</sup> informed the Oxfordshire Growth Board's decision on the apportionment of Oxford's unmet need, which is set out in the Post SHMA Work Programme Report to Oxfordshire Growth Board<sup>9</sup> on the 26 September 2016.
- 2.1.6 The process undertaken to determine the apportionment is in accordance with national policy and supported by proportionate evidence. The Council acknowledges that the Oxfordshire Growth Board process is not a formal planning process and its outputs are not statutory planning documents. It was made clear that individual Local

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<sup>1</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version) (in particular Section 2)

<sup>2</sup> **DUC01** Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area – Meeting the Objectively Assessed Need for Housing in Oxfordshire

<sup>3</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 181), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> Oxford City Council (2014) Oxford's Housing Land Availability Assessment, available at: [https://www.oxford.gov.uk/downloads/file/1720/shlaa\\_-\\_december\\_2014](https://www.oxford.gov.uk/downloads/file/1720/shlaa_-_december_2014)

<sup>5</sup> Cundall (2014) Unlocking Oxford's Development Potential, available at: <http://www.southoxon.gov.uk/sites/default/files/Unlocking%20Oxford's%20Development%20Potential%2028-11-14.pdf>

<sup>6</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 159), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> **HOU08** Oxford Spatial Options Assessment

<sup>8</sup> **HOU08** Oxford Spatial Options Assessment

<sup>9</sup> Oxfordshire Growth Board (2016) Post SHMA Strategic Work Programme, available at: [https://mycouncil.oxfordshire.gov.uk/documents/s34708/OGB\\_SEP2616R02%20apportionment%20of%20Oxfords%20unmet%20need.pdf](https://mycouncil.oxfordshire.gov.uk/documents/s34708/OGB_SEP2616R02%20apportionment%20of%20Oxfords%20unmet%20need.pdf)

Plans were sovereign<sup>10</sup>. The Spatial Options Assessment Final Report (**HOU08**) says that the report “*does not make specific recommendations about which options should or should not be taken forward, although the findings of the assessment are a key piece of evidence that will be used by the Growth Board to inform this decision making, including the Oxfordshire Green Belt assessment*”<sup>11</sup>. It is also made clear that it will be the role of the subsequent Local Plan reviews to allocate specific development sites (**HOU08**)<sup>12</sup>. However, none of this undermines the collaborative approach to determining the figure for unmet needs as a working assumption to be endorsed through the statutory process.

- 2.1.7 The National Planning Policy Framework is clear that Local Plans should be positively prepared and should seek to meet objectively assessed development requirements “*including unmet requirements from neighbouring authorities where it is reasonable to do so*”<sup>13</sup>. Although National policy does not provide guidance for how unmet requirements should be planned for, or what evidence may be required to support it, it provides clear guidance as to the role of local planning authorities when strategic issues are concerned. In relation to the Duty-to-Cooperate, Paragraph 181 states:

*“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by the way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position”*<sup>14</sup>.

- 2.1.8 The working assumption of 2,200 for unmet needs has therefore been arrived at through co-operation with neighbouring authorities in accordance with national policy.

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<sup>10</sup> Oxfordshire Growth Board (2015) Post SHMA Strategic Work Programme (in particular paragraph 4), available at: <http://modgov.cherwell.gov.uk/documents/s29692/Post%20SHMA%20Strategic%20Work%20Programme.pdf?txtonly=1>

<sup>11</sup> **HOU08** Oxford Spatial Options Assessment (in particular paragraph 0.3)

<sup>12</sup> **HOU08** Oxford Spatial Options Assessment (in particular paragraph 0.3)

<sup>13</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 182), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>14</sup> CLG (2012) The National Planning Policy Framework, (in particular paragraph 181), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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

- 2.2.1 The Council has signed Statements of Common Ground with all neighbouring authorities in Oxfordshire (**SCG08**<sup>15</sup>, **SCG12**<sup>16</sup>, **SCG19**<sup>17</sup>), including Oxford City Council (**SCG18**<sup>18</sup>), which not only confirms their acceptance of the approach being followed, but also of the approach to addressing any change to unmet need. This would be to undertake a comprehensive approach to reviewing the housing need for Oxfordshire and be coordinated by the Oxfordshire Growth Board, as set out within the Statements of Common Ground (for example **SCG08**<sup>19</sup>, **SCG12**<sup>20</sup>, **SCG19**<sup>21</sup>)
- 2.2.2 Furthermore, the Oxfordshire authorities are now committed to preparing a Joint Statutory Spatial Plan (JSSP) for submission to the Secretary of State in March 2020. This is one of the commitments set out in the Oxfordshire Housing and Growth Deal, approved by Government in November 2017<sup>22</sup>. The Vale of White Horse District Council is committed to supporting the preparation of the JSSP, as agreed by Council<sup>23</sup>, and also to prepare an update to their own Local Plan, also for submission in early 2020.
- 2.2.3 The preparation of a JSSP will require an updated assessment of housing needs to be undertaken Oxfordshire wide, which will need to be undertaken in the context of the revised national policy for housing need that has recently been consulted upon<sup>24</sup>. This approach will ensure the housing need for Oxfordshire is reviewed promptly to facilitate effective planning for housing for Oxfordshire, including unmet need for Oxford, for the period up to 2031, and beyond.

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<sup>15</sup> **SCG08** Statement of Common Ground with South Oxfordshire District Council

<sup>16</sup> **SCG12** Statement of Common Ground with West Oxfordshire District Council

<sup>17</sup> **SCG19** Statement of Common Ground with Cherwell District Council

<sup>18</sup> **SCG18** Statement of Common Ground with Oxford City Council

<sup>19</sup> **SCG08** Statement of Common Ground with South Oxfordshire District Council

<sup>20</sup> **SCG12** Statement of Common Ground with West Oxfordshire District Council

<sup>21</sup> **SCG19** Statement of Common Ground with Cherwell District Council

<sup>22</sup> Oxfordshire Growth Board (2017) Oxfordshire Housing and Growth Deal, available here: [https://www.oxford.gov.uk/info/20283/oxfordshire\\_growth\\_board/1236/oxfordshire\\_housing\\_and\\_growth\\_deal](https://www.oxford.gov.uk/info/20283/oxfordshire_growth_board/1236/oxfordshire_housing_and_growth_deal)

<sup>23</sup> Vale of White Horse District Council – Minutes of a meeting of the Council held on Wednesday 14 February 2018 (in particular Co60/B/9, page Co4), available at: <http://democratic.whitehorsedc.gov.uk/documents/g2290/Printed%20minutes%20Wednesday%2014-Feb-2018%2019.00%20Council.pdf?T=1>

<sup>24</sup> MHCLG (2018) National Planning Policy Framework, Draft text for consultation, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685289/Draft\\_revised\\_National\\_Planning\\_Policy\\_Framework.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf)

## **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 approach to meeting the unmet housing needs for Oxford within the Abingdon-on-Thames and Oxford Fringe Sub-Area is the most appropriate when considered against reasonable alternatives and is supported by proportionate evidence, as detailed in the Topic Paper 2: Site Selection (**TOP02.1**)<sup>25</sup>.
- 2.3.2 The Abingdon-on-Thames and Oxford Fringe Sub-Area is the most appropriate area to meet the Vale's proportion of Oxford's unmet needs due primarily to its close proximity to Oxford. The Council have demonstrated that at least 2,200 dwellings are on sites close to and accessible to Oxford, as set out in Table 2.1 of the Part 2 plan (**CSD01**)<sup>26</sup>, through a combination of site allocations in the Part 1 and Part 2 plans. The strategy is consistent with the Spatial Strategy of the Local Plan 2031, as set out in the Part 1 plan (**ALP02**)<sup>27</sup>, in short because the allocations reinforce the service centre roles of the main settlements across the district and promote thriving village and rural communities whilst safeguarding the countryside<sup>28</sup>.
- 2.3.3 This strategy is also supported by the conclusions of the Part 1 Inspector who stated that the housing allocated in the Part 1 plan around Abingdon, Radley and Kennington would be available just as much to people falling within an Oxford need as well as a Vale need. Moreover, Oxford City consider these sites are well located to meet their need and the Abingdon-on-Thames and Oxford Fringe Sub Area is closest to Oxford<sup>29</sup>.
- 2.3.4 The Council has published a suite of supporting documentation alongside the submitted plan, in particular, Topic Paper 2: Site Selection (**TOP02.1**)<sup>30</sup> and the Sustainability Appraisal (SA) Report (**CSD09**)<sup>31</sup>. The Topic Paper 2: Site Selection (**TOP02.1**)<sup>32</sup> details how the Council has selected sites, demonstrated their consistency with the Spatial Strategy established by the Adopted Part 1 plan and responded to consultation (in particular Section 4: Requirements for Local Plan 2031 Part 2). Appendix A sets out a high-level assessment of over 400 sites and Appendix B sets out a more detailed assessment of over 30 short-listed sites. The SA Report (**CSD09**)<sup>33</sup> sets out in detail the iterative process of identifying and testing the reasonable alternatives (in particular Section 6: Establishing the reasonable alternatives).
- 2.3.5 The SA Report (**CSD09**) includes a summary of the Council's approach to selecting the Preferred Option (Page 33 of the SA Report) and includes the following:

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<sup>25</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version), Section 4

<sup>26</sup> **CSD01** Local Plan 2031 Part 2 Detailed Policies and Additional Sites (Publication Version) (in particular page 23)

<sup>27</sup> **ALP02** Local Plan 2031 Part 1: Strategic Sites and Policies

<sup>28</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version), Section 4

<sup>29</sup> **ALP03** Inspectors Report on the Examination into Vale of White Horse Local Plan 2031 Part 1, (in particular paragraphs 25, 55 and 56)

<sup>30</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version)

<sup>31</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version)

<sup>32</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version)

<sup>33</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version) (in particular Section 6)

*“The Council has followed an iterative approach to plan making, ensuring the plan is informed by a wide range of technical evidence, formal and informal consultation, including with key stakeholders such as Oxfordshire County Council and the Statutory Bodies, and SA. The SA has informed each stage of plan making, with an ‘interim’ report subject to consultation alongside the ‘Preferred Options’ plan in March 2017.*

*The Council has followed a comprehensive approach to site selection, based on the approach followed to inform the Part 1 plan and consistent with guidance. This has included assessing over 400 sites with a proportion of these being assessed in some detail through the SA, both in isolation and in combination. The Council’s site selection has been informed by the SA and other wide-ranging factors. Key considerations include: minimising impacts on an already constrained highway network and seeking to maximise opportunities for supporting sustainable modes of travel; supporting housing delivery to fully meet the identified housing need for the district and for the agreed quantum of unmet housing need for Oxford to be addressed within the Vale and maintaining an up to date housing supply, which should rely, as far as possible, on allocating sites of different size, type and geography; supporting the delivery of appropriate infrastructure; seeking to minimise any harmful consequences, such as harming the environment.*

*The site allocations set out in the Part 2 plan represent the Council’s strategy for meeting sustainable development, having considered a range of alternatives (i.e. alternative sites, and alternative strategies). Development at Dalton Barracks, for example provides an opportunity to: maximise use of brownfield land, minimise Green Belt impact, deliver a comprehensive package of infrastructure including new schools, connect new housing well to Oxford and Abingdon-on-Thames via sustainable modes, and facilitate a comprehensive approach to planning for the long term. Other sites seek to make use of relatively unconstrained sites, minimise harmful impacts and balance these with fully meeting the identified housing requirement”<sup>34</sup>.*

2.3.6 The Council’s approach to site selection and SA was iterative, informed by comprehensive technical evidence and formal and informal consultation. The proportionate technical evidence prepared to inform the assessment includes (refer also to the Site Selection Topic Paper Section 3: Site Selection Methodology)<sup>35</sup>:

- Landscape Capacity Study
- Evaluation of Transport Impacts
- Water Cycle Study
- Strategic Flood Risk Assessment
- Viability Assessment, and
- Green Belt Assessment.

2.3.7 Section 6 of the SA Report (**CSD09**)<sup>36</sup> describes the process of establishing and testing the reasonable alternatives in detail. This demonstrates a comprehensive approach to identifying reasonable alternatives, being informed by an examination of high level issues and options, by examining larger sites options and by examining smaller site options in detail. Alternatives were considered in relation to individual

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<sup>34</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version) (in particular page 33)

<sup>35</sup> **TOP02.1** Topic Paper 2: Site Selection (Publication Version), Section 3

<sup>36</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version), Section 6

sites, and for different strategies to meet unmet need, and included consideration for a reliance on large sites versus a greater number of smaller sites.

- 2.3.8 The alternatives considered evolved through the plan making process, including taking account of consultation. For example, consideration was given to new site options identified following the 'Preferred Options' consultation such as for focusing the allocation of sites to address the agreed quantum of unmet housing for Oxford within the Vale in the Abingdon-on-Thames Sub-Area, rather than within both the Abingdon-on-Thames and Oxford Fringe Sub-Area and South-East Vale Sub-Area following consultation responses from Oxford City Council and Oxfordshire County Council.

## 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 The stated strategy for meeting the unmet housing needs in the Abingdon-on-Thames and Oxford Fringe Sub-Area is followed through into the Part 2 plan.

2.4.2 The Part 2 plan makes provision for the agreed quantum of unmet housing need for Oxford, to be addressed within the Vale, in full, (2,200 dwellings), and additional sites are allocated to ensure the identified Vale need, plus unmet need, is met within this sub-area. At least 2,200 dwellings are provided for on sites that are demonstrably close and accessible to Oxford (Table 2.1), recognising that the Part 1 sites will be just as much available to those falling within an Oxford need as a Vale need. This view was shared by the Planning Inspector presiding over the Part 1 plan. The Inspector's final report (**ALP03**) states the following in relation to the Part 1 allocations around Abingdon-on-Thames, Radley and Kennington:

*"Whilst allocated with the primary intention of meeting the Vale's own objectively-assessed need for housing, as discussed at the hearings, Oxford City Council consider these sites to be well-located to provide for their own unmet housing needs. Notwithstanding the primary purpose of their allocation, housing on these sites would be available just as much to people falling within 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'<sup>37</sup>.*

2.4.3 The Council considers that the Part 2 plan has identified a strategy for meeting Vale's proportion of Oxford's unmet need consistent with Core Policy 2 of the Part 1 plan<sup>38</sup>. Core Policies 4a and 8a set out the housing supply for the district and sub-area and show how the identified requirement will be fully met (Table 2.2 provides the sub area supply). The Council's response (**PCO1.1**)<sup>39</sup> to the Inspector's Preliminary Questions demonstrates the difference between the Part 1 and Part 2 plans and illustrates that the Council has followed through with its strategy for unmet needs.

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<sup>37</sup> **ALP03** Inspector's Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 25)

<sup>38</sup> **ALP02** Local Plan 2031 Part 1: Strategic Sites and Policies

<sup>39</sup> **PCO1.1** Vale of White Horse Response to Inspector's Preliminary Questions dated 27 March 2018 (in particular Table 1 and 2)

**Table 2.1: Vale of White Horse Local Plan Part 1 and Part 2 allocations that are demonstrably close to and accessible to Oxford<sup>40</sup>.**

Site	Allocation
North Abingdon-on-Thames (LPP1 allocation)	950 <sup>a</sup>
North-West Abingdon-on-Thames (LPP1 allocation)	200
North-West Radley (LPP1 allocation)	240
South of Kennington (Radley Parish; LPP1 allocation)	270
Dalton Barracks (LPP2 Allocation)	1,200
<b>Total</b>	<b>2,860</b>

<sup>a</sup> The LPP1 allocation for North Abingdon-on-Thames was for around 800 dwellings, however a Planning Application for 950 dwellings was approved at committee on 26 July 2017

**Table 2.2: Abingdon-on-Thames and Oxford Fringe Sub-Area housing supply<sup>41</sup>.**

Category	Number of Dwellings	
Housing requirement for the full plan period (Apr 2011 to Mar 2031)	7,512	
Housing completions (Apr 2011 to Mar 2017)	2,051	
Housing Supply (Apr 2017 to Mar 2031)	Known Commitments	1,401
	Local Plan 2031: Part 1 allocations	1,790
	Local Plan 2031: Part 2 allocations	2,020
	Windfalls	308
Total Remaining to be identified (at October 2017)	0	

<sup>40</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version) (in particular Table 2.1, Page 23)

<sup>41</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version) (in particular Core Policy 8a, Page 32)

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 the Green Belt the most appropriate?**

2.5.1 The strategy for addressing the agreed quantum of unmet housing need for Oxford, to be met within the Vale, is the most appropriate and is consistent with national policy, guidance and legislation.

2.5.2 As has been explained in response to Matter 2.3 (see above), the Council has followed a comprehensive approach to plan production that was consistent with the approach to preparing the Part 1 plan. The preferred strategy has been informed by iterative formal and informal consultation, technical evidence and SA (**CSD09**<sup>42</sup>) testing both reasonable alternative site options and strategies.

2.5.3 It is noted that Paragraph 136 of the draft NPPF also makes reference to “*make as much use as possible of suitable brownfield sites and underutilised land*”<sup>43</sup>. Whilst the draft NPPF is not yet adopted policy, the Council has sought to support the Government intentions to minimise harm to the Green Belt, whilst also ensuring consistency with currently adopted national policy, including Paragraphs 83 to 85, which include:

*“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider that Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”*<sup>44</sup>.

5.1.1 The Council is content that ‘exceptional circumstances’ exist to justify the amendment of the Green Belt at Dalton Barracks with minimal harm to the Green Belt purposes and to support maximum use of brownfield sites and to provide long-term flexibility, thus minimising the likelihood of further Green Belt amendments being required in the future. The ‘exceptional circumstances’ are discussed in more detail in response to Matter 5. In addition, land at Dalton Barracks had not previously been assessed, either during the development of the Part 1 plan nor by the Oxfordshire Growth Board process, as it was not known that the Defence Infrastructure Organisation (DIO) would be seeking to release the site from their estate and thus make it available for redevelopment. The Council consider the release of the Dalton Barracks site by the DIO to constitute a ‘major change in circumstances’<sup>45</sup>.

2.5.4 The Council note the comments in the Final Report of the Planning Inspector presiding over the Part 1 plan examination (**APL03**)<sup>46</sup>, which included:

*“Within this Sub-Area there is very limited potential for housing development within the main settlements themselves and the built-up areas of Botley, Radley and*

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<sup>42</sup> **CSD09** Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 2 (Publication Version)

<sup>43</sup> MHCLG (2018) National Planning Policy Framework, Draft text for consultation (in particular paragraph 136), available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685289/Draft\\_revised\\_National\\_Planning\\_Policy\\_Framework.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf)

<sup>44</sup> CLG (2012) National Planning Policy Framework (in particular paragraph 83), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>45</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 82), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>46</sup> **ALP03** Inspector’s Report on the examination into Vale of White Horse Local Plan 2031 Part 1

*Kennington are very closely bounded by Green Belt, as are the eastern, northern and western sides of Abingdon-on-Thames. Whilst land to the south of Abingdon-on-Thames is outside the Green Belt, access difficulties and potential flooding render its development for housing highly problematic<sup>47</sup>; and*

*“National policy does not prohibit an authority from revising Green Belt boundaries subject to it being done in exceptional circumstances, through a Local Plan and having regard to the need to promote sustainable patterns of development. I therefore do not accept the argument that a revision of the Green Belt boundaries is inherently unsustainable.<sup>48</sup>”*

- 2.5.5 Furthermore, as the Inspector presiding over the Part 1 plan found four strategic Green Belt release sites to be soundly based around Abingdon-on-Thames, Radley and Kennington, all located close and accessible to Oxford, this provided the opportunity for the ‘additional’ site allocations set out within the Part 2 plan to contribute to Vale housing need, as well as Oxford housing need.
- 2.5.6 This approach helps to ensure the most appropriate strategy can be employed overall with both Vale and Oxford need being met in full, with at least 2,200 homes being provided on sites demonstrably close and accessible to Oxford, with minimal harm to the Green Belt purposes and making maximum use of brown field land, and still giving consideration to all other relevant factors and by providing long-term flexibility.
- 2.5.7 The Council considers it has met the requirements of the existing NPPF and the recently consulted amendments to the NPPF<sup>49</sup> and that the plan strategy is the most appropriate following consideration of alternatives and that exceptional circumstances exist to justify an amendment to the Green Belt boundary

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<sup>47</sup> **ALP03** Inspector’s Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 77)

<sup>48</sup> **ALP03** Inspector’s Report on the examination into Vale of White Horse Local Plan 2031 Part 1 (in particular paragraph 85)

<sup>49</sup> MHCLG (2018) National Planning Policy Framework, Draft text for consultation, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685289/Draft\\_revised\\_National\\_Planning\\_Policy\\_Framework.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf)

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

- 2.6.1 The Council's strategy for meeting the agreed quantum of unmet housing need for Oxford within the Vale is deliverable within the plan period up to 2031. The Post SHMA Work Programme Report to Oxfordshire Growth Board stated that the apportionment of Oxford's unmet need was based on a commencement date of 2021, but it did not preclude earlier delivery<sup>50</sup>.
- 2.6.2 The Council consider the sites contributing towards meeting unmet needs provides flexibility and ensures delivery over the plan period, as demonstrated in the Council's Matter 8 Statement in particular Appendix A and B. The Part 1 sites are progressing positively with applications either under determination or with granted planning permission. In particular, full permission has been granted for the North of Abingdon-on-Thames allocation for 950 dwellings, with delivery anticipated to commence in 2019.
- 2.6.3 This demonstrates the Council will be delivering housing that is demonstrably close and accessible to Oxford from 2019, which is two years sooner than the Oxfordshire Growth Board's expectations and may be the first site to contribution towards unmet needs, outside of Oxford, within the County.
- 2.6.4 The Part 2 plan allocates Dalton Barracks which will also contribute towards Oxford's unmet needs and ensures housing will be delivered throughout the plan period
- 2.6.5 The housing trajectory demonstrates the delivery of the sites that contribute towards Oxford's unmet need (shown by Appendix A) which is appended to the Council's Matter 8 statement. The delivery of the Dalton Barracks site is also discussed further within the Council's Matter 5 statement.

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<sup>50</sup> Oxfordshire Growth Board (2016) Post SHMA Strategic Work Programme (in particular paragraph 16), available at:  
[https://mycouncil.oxfordshire.gov.uk/documents/s34708/OGB\\_SEP2616R02%20apportionment%20of%20Oxfords%20unmet%20need.pdf](https://mycouncil.oxfordshire.gov.uk/documents/s34708/OGB_SEP2616R02%20apportionment%20of%20Oxfords%20unmet%20need.pdf)

**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 Council considers the process for reviewing and updating the working assumption of Oxford's unmet need is detailed in the Council's response to Question 2.2 above. The Council consider the commitment by all of the Oxfordshire authorities to prepare an Oxfordshire Joint Statutory Spatial Plan (JSSP), for submission to the Secretary of State in March 2020, will ensure that the housing requirement for Oxfordshire is reviewed within a timely manner, including the level of unmet need that exists within the City boundaries. This will be informed by an up to date assessment of housing needs Oxfordshire wide in accordance with national policy.
- 2.7.2 The Vale of White Horse commitment to support the preparation of the JSSP and to prepare an updated Local Plan for the Vale in parallel, also for submission in early 2020, ensures there is flexibility for planning for future unmet need up to 2031 and beyond.
- 2.7.3 The Part 2 plan makes provision for over 2,800 homes on sites that are demonstrably close and accessible to Oxford, and these sites are just as much available to those individuals falling within an Oxford need as a Vale need. The Dalton Barracks site is capable of accommodating substantially more housing in the longer term, as identified by Core Policy 8a<sup>51</sup>, and so the plan already provides for additional flexibility that could be used in making further contributions to unmet housing need in the longer term. The Dalton Barracks site is discussed more within the Council's Matter 5 statement.

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<sup>51</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version) (in particular Core Policy 8a, Page 32)

## 2.8 What are the arrangements for securing affordable housing to meet the needs of Oxford within this figure. Would they be effective and deliverable?

- 2.8.1 The Council recognises the need to support the delivery of affordable housing for Oxford, which makes up an important component of the agreed quantum of unmet need. Oxford City's policy requires a 50 % contribution to affordable housing (Policy CS24: Affordable housing<sup>52</sup>) and therefore it is considered that up to 1,100 affordable dwellings may be expected to be provided for within the Vale. However, the Council considers that until the updated Oxford City Local Plan is adopted, the precise number of affordable housing need for Oxford will be unconfirmed. The Oxford City Preferred Options Local Plan stated that some housing allocations within Oxford may consist of 100 % affordable housing<sup>53</sup>. On this basis, the need for affordable housing for Oxford from neighbouring authorities may reduce, and the Council consider there needs to be some flexibility reflecting this.
- 2.8.2 In determining the contribution of affordable housing in the Vale towards meeting Oxford's unmet need, the Council consider the sites identified that are demonstrably close and accessible to Oxford should contribute. The Vale's policy requires a 35 % contribution to affordable housing on sites of eleven dwellings or more (Core Policy 24: Affordable Housing<sup>54</sup>). The Council consider the application of a higher affordable housing threshold would be unviable<sup>55</sup> and contrary to national policy<sup>56</sup> as tested through the Part 1 plan.
- 2.8.3 The sites identified as demonstrably close and accessible to Oxford, as listed in Table 2.1 above, would contribute around 980 affordable units in total, consistent with Core Policy 24. However, it is important to consider that these sites will be meeting both Vale and Oxford housing needs, and so it is proposed that affordable units on these sites are allocated on the basis of 10 % to Vale and 25 % to Oxford. This ensures the provision of around 700 affordable dwellings to Oxford, which equates to over seven years supply within the Vale.
- 2.8.4 In addition, the Council considers that re-lets of affordable housing on an annual basis, specifically within the Abingdon-on-Thames and Oxford Fringe Sub-Area, could also contribute towards Oxford's unmet affordable housing need. Should it be necessary to allocate additional affordable units to Oxford within the Vale, and within the plan period, the Council's Affordable Housing Allocations Policy will make provision for allocating re-lets in the Abingdon-on-Thames and Oxford Fringe Sub-Area to Oxford residents. The Council also considers that whilst not allocated for the intention of contributing housing to the unmet need for Oxford, the allocation at East of Kingston Bagpuize with Southmoor (in Fyfield and Tubney Parish) of around 600 dwellings could also contribute over 200 affordable dwellings in total, thus providing further flexibility should this become necessary.

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<sup>52</sup> Oxford City Council (2011) Core Strategy, Policy CS24: Affordable housing, Page 109, available at: [https://www.oxford.gov.uk/downloads/file/1450/oxford\\_core\\_strategy](https://www.oxford.gov.uk/downloads/file/1450/oxford_core_strategy)

<sup>53</sup> Oxford City Council (2017) Oxford Local Plan 2036 Preferred Options, Page 36, available at: [https://www.oxford.gov.uk/downloads/file/3738/oxford\\_local\\_plan\\_2036\\_preferred\\_options\\_full\\_document\\_low\\_res](https://www.oxford.gov.uk/downloads/file/3738/oxford_local_plan_2036_preferred_options_full_document_low_res)

<sup>54</sup> **ALP02** Local Plan 2031 Part 1: Strategic Sites and Policies (in particular Core Policy 24: Affordable Housing, Page 109)

<sup>55</sup> HDH Planning & Development (2014) Vale of White Horse District Council Local Plan Viability Study, available at: [http://www.whitehorsedc.gov.uk/java/support/dynamic\\_serve.jsp?ID=627982262&CODE=472C9BB8F54A90FE176DAC899B9E3BA1](http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=627982262&CODE=472C9BB8F54A90FE176DAC899B9E3BA1)

<sup>56</sup> CLG (2012) The National Planning Policy Framework (in particular paragraph 173), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 2.8.5 The Council consider the mechanism for allocating affordable housing to meet Oxford's needs sits outside of the plan making process, as identified in the Part 2 plan (**CSD01**)<sup>57</sup>, and the Council has made a clear commitment to progress this work, which has been agreed with Oxford City (**SCG18**)<sup>58</sup>. The Part 2 plan makes the commitment to work with Oxford City Council to develop an Affordable Housing Allocations Policy to define the precise mechanism for how individual dwellings will be allocated to Oxford residents. This work has commenced through a review of the Council's Affordable Housing Allocations Policy, which is involving officers from Oxford City Council. The updated Affordable Housing Allocations Policy will be adopted later in 2018. This will allow the commencement of the allocation of affordable dwellings to Oxford City residents during 2019 in line with the delivery of the first housing completions expected from the sites listed in Table 2.1 above.
- 2.8.6 The preparation of an updated Local Plan for the Vale, prepared in parallel to the Oxfordshire Joint Statutory Spatial Plan (JSSP), is intended for submission to the Secretary of State in March 2020. It is anticipated that the JSSP and updated Vale Local Plan will both be adopted before the end of 2021, thus providing additional flexibility. This approach will ensure that housing need for Oxfordshire continues to be planned for comprehensively and is based on up to date evidence.
- 2.8.7 The approach outlined above is effective and consistent with the Oxfordshire Growth Board Memorandum of Understanding (**DUC01**)<sup>59</sup> and Statement of Common Ground with Oxford City (**SCG18**)<sup>60</sup>, and is deliverable with both market and affordable housing for Oxford from 2019 onwards. The Council consider the Affordable Housing Allocations Policy is an effective mechanism to secure the affordable housing to meet Oxford's need. The commitment set out in the Part 2 plan for the Council to meet the affordable housing need will ensure the need is delivered<sup>61</sup>. In addition, the Plan enables flexibility should it be necessary to provide additional affordable housing for Oxford within the Vale.

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<sup>57</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version) (in particular Paragraph 2.25)

<sup>58</sup> **SCG18** Statement of Common Ground with Oxford City Council

<sup>59</sup> **DUC01** Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area – Meeting the Objectively Assessed Need for Housing in Oxfordshire

<sup>60</sup> **SCG18** Statement of Common Ground with Oxford City Council

<sup>61</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version) (in particular Paragraph 2.25)

**2.9 How would the strategy for meeting Oxford’s housing needs within the Vale be monitored to ensure its delivery? Is a housing supply ring fence for Abingdon and the Oxford Fringe Sub Area required?**

- 2.9.1 The Council consider the strategy for meeting Oxford’s unmet needs is deliverable, as detailed in the Council’s response to Question 2.6 above, and thus is confident the sites listed in Table 2.1 above will deliver within the plan period. It has been demonstrated that the Council will be delivering housing to meet the unmet need from 2019 onwards.
- 2.9.2 The Council will monitor the progress of these sites as set out in the Monitoring Frameworks for both Plans. The progress of these sites will be monitored on an annual basis as part of the Five-Year Housing Land Supply Statement and reported on in the Authority Monitoring Report. In monitoring the progress of sites, the Council undertake a robust and comprehensive approach, as further explained in the Council’s Matter 8 statement. In addition, the Council’s Monitoring Framework for both plans include actions detailing the action the Council will undertake if delivery is not taking place, in particular the measures set out in Core Policy 47a (**CSD01**)<sup>62</sup>.
- 2.9.3 The Council considers that the monitoring arrangements explained in paragraph 2.9.2 will enable the Council to effectively monitor the delivery of its strategy to meet Oxford’s unmet need. It is therefore considered that a specific monitoring approach, such as a housing supply ring-fence within the Abingdon-on-Thames and Oxford Fringe Sub-Area is not required.
- 2.9.4 The Council does not consider that a housing supply ring-fence within the Abingdon-on Thames and Oxford Fringe Sub-Area is required. The approach to housing delivery within the adopted Part 1 is already proving to be effective for which the Part 2 plan will complement.
- 2.9.5 The Council considers that the proposed approach, as set out in the Part 1 and 2 plans, provides sufficient flexibility, in particular with the Presumption in Favour of Sustainable Development applying to the built-up areas of market towns, local services centres and larger villages. Furthermore, the Part 1 and 2 plans allocate a sufficient range of sites, of suitable size, type and geography to ensure the housing trajectory is met as discussed in more detail within the Council’s Matter Statement 8. Table 2.1 clearly illustrates the quantum of housing allocated within the Part 1 and 2 plans that are demonstrably close and accessible to Oxford already exceeds the 2,200 unmet need figure agreed to be apportioned to the Vale of White Horse by the Oxfordshire Growth Board (Refer to the Council’s response to Matter 2.1).
- 2.9.6 Given the importance of meeting the unmet housing need for Oxford on sites that are demonstrably close and accessible to the City, and the coverage of the Oxford Green Belt within the Vale located closest to Oxford, it is also unclear how a ring-fence in this area would function, or if it would be effective.

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<sup>62</sup> **CSD01** Local Plan 2031 Part 2: Detailed Policies and Additional Sites (Publication Version)