

VALE OF WHITE HORSE
LOCAL PLAN 2031 - PART 1
Examination in Public
Stage 1 – Matter 4

Representations
on behalf of
Jewson Holdings Limited

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Introduction

1. This statement is submitted on behalf of Jewson Holdings Limited (Jewson Holdings) as part of the Stage 1 Examination in Public of the Vale of White Horse Local Plan 2031 – Part 1 (LPP1). Jewson Holdings have land under their control south east of Farmoor between the B4044 and B4017 and within the Vale of White Horse District ('the Vale') and the Oxford Green Belt.
2. The following sections of this statement consider and respond to the Inspector's Stage 1 Matters and Questions with respect to Matter 4 – Unmet Housing Needs. It should be read alongside and as an update to Jewson Holdings' previous representations.

4.1 Is the approach to meeting within the District any housing needs which cannot be met elsewhere in Oxfordshire, as set out in policy CP2, soundly based and does it accord with national policy?

3. Jewson Holdings support the intentions of Core Policy 2 to co-operate with adjoining authorities to address Oxford's unmet housing needs but object on the basis this co-operation and a strategic Green Belt review has not been undertaken to inform the Local Plan Part 1 (LPP1).
4. At the time of making representations on the Draft Local Plan (December 2014) the agreement over the disaggregation of unmet needs among Oxfordshire district's was expected to have been complete by August 2015. Some progress has been made by the Oxfordshire Growth Board and it is noted that a number of workstreams, including a Green Belt Study, are ongoing.
5. Based on the revised programme (see below) the disaggregation of unmet needs will be completed around a similar time that LPP1 would expect to be adopted (March 2016) rendering the plan out of date almost immediately.
6. NPPF paragraph 47 requires authorities to ensure Local Plans meet the full objectively assessed needs in the housing market area, paragraph 157 requires plans to take account of longer term requirements and be kept up to date and paragraph 179 that strategic priorities (including the homes needed in the area) are properly co-ordinated and reflected in individual Local Plans.

7. Jewson Holdings continue to assert that, where there is an acceptance of unmet housing need arising out of Oxford, that need must be addressed by Local Plans in accordance with NPPF paragraphs 47, 157 and 159.
8. Since the publication of LPP1 in 2014, it is also acknowledged that the report of the Cherwell Local Plan Inspector has been published and indeed is something the Council rely on.
9. Some of the conclusions of the Cherwell Inspector's Report (paragraphs 17 and 18) may be summarised as:
 - Addressing Oxford's unmet needs requires a joint approach involving all the relevant Council's;
 - Cherwell meeting its own need will mean that pressures on the city of Oxford will not be made any worse;
 - It was appropriate for that plan to proceed on the basis of a firm commitment by the Council to play its part in addressing the needs of Oxford City once they had been fully clarified/confirmed.
10. Core Policy 2 similarly proposes that the Vale first meets its own needs but with a commitment to work with other Oxfordshire authorities to address Oxford's unmet needs. These intentions are supported and there is notable similarity with the views of the Cherwell Inspector.
11. The work of the Oxfordshire Growth Board has clearly moved on and is more advanced than at the time of the Cherwell Examination. This is clearly set out in the most recent work programme which was presented to the Board on 30th July 2015 which identifies that a Green Belt Study and the appraisal of strategic options is ongoing. The disaggregation of Oxford's unmet needs among districts is now much more of a reality.
12. Should LPP1 be allowed to proceed as proposed and without addressing Oxford's needs in a timely manner, it is quite conceivable that other district Local Plans will follow suit (e.g. West Oxfordshire) and none will address Oxford's needs in a timely manner. This will be clearly be unsound.
13. Whilst there is intention to co-operate to address Oxford's unmet housing needs, it is the outcomes of this process which need to be tested and enshrined in the Local Plan process.

14. If LPP1 proceeds to adoption as proposed, it will be out of date almost immediately yet there will be little incentive to address unmet needs in a timely manner – which will only mean that the housing pressures of Oxford will increase. Such an eventuality must be considered unsound and ineffective.

4.2 What is the likely timescale for agreement being reached between the relevant authorities on (i) the scale of unmet needs in Oxford City (and any other district) (ii) the most appropriate way of any unmet needs being provided for?

15. The most recent report to the Oxfordshire Growth Board on 30th July 2015 presented and sought the endorsement of an updated programme which confirmed the following timing:
- Definition of Oxford's unmet need by August 2015;
 - Outcome of the Green Belt Study by January 2016;
 - Distribution of unmet needs by March 2016.
16. Whilst there has been some slippage, the Growth Board Programme identifies that various workstreams are ongoing including a Green Belt Study. It is expected on the above timetable that if LPP1 is allowed to proceed to adoption as proposed then it will be out of date almost immediately.
17. It is also of concern that, whilst the Growth Board programme can be followed through its meetings, the process of defining Oxford's unmet need, assessing spatial options and distributing the unmet need is being undertaken without public consultation as this is intended through a subsequent Local Plan Review.
18. Jewson Holdings has significant concerns that, if LPP1 proceeds to adoption as proposed, Oxford's unmet housing needs will not be addressed in a timely manner despite the intentions of Policy CP2 and that it will be out of date almost immediately.
19. Allowing LPP1 (and other emerging district Local Plans) to proceed in advance of the conclusion of the ongoing work of the Oxfordshire Growth Board will not assist the process as it will dis-incentivise these Council's from addressing the issue. If the unmet needs are not met through LPP1 it is not clear when they will be addressed. This is clearly ineffective and contrary to the NPPF.

4.3 Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?

20. The endorsed principles of the Oxfordshire Growth Board include:
- A recognition that the work must be collaborative and joined up to provide a county wide spatial picture and strategy; and
 - A recognition therefore that joint work on future spatial options, transport infrastructure and green belt will be required to feed into Local Plans.
21. Core Policy 2 and the Growth Board Programme is explicit in including a strategic Green Belt Review – which is reportedly underway. Jewson Holdings have land under their control at Farmoor which is in the Oxford Green Belt and which they seek to be considered in the Green Belt Review.
22. As highlighted above it is also of significance that joint work will be required on transport infrastructure. Additional strategic growth areas will be required and it is likely that some will be in the Green Belt, such as potential land at Farmoor. This would clearly be a significant alteration to the spatial strategy.
23. Furthermore, the identification of new growth areas may open up opportunities for improvements to transport infrastructure such as funding the B4044 community path between Oxford/Botley and Eynsham, via Farmoor.
24. Equally, additional growth will need to be considered in terms of its impacts and appraised alongside and against existing and alternative options – for example transport impacts on the A34 corridor will need to be considered alongside existing growth proposals.
25. Allowing the Vale Local Plan to proceed in advance of the Green Belt Review and agreement on Oxford's unmet need may constrain the ability to properly coordinate and address strategic development and transport priorities in accordance with paragraph 179 of the NPPF.

4.4 If you contend that the approach set out in policy CP2 is not soundly based should the Local Plan be delayed pending agreement on 4.2 (i) and (ii) above or could modifications to the plan be made to make it sound?

26. In Jewson Holdings' view a strategic Green Belt review is required at the current time to inform LPP1 and to identify and allocate additional sites to meet Oxford's unmet housing needs. Such an assessment should include Jewson Holdings' land at Farmoor. In the absence of such an assessment, LPP1 cannot be considered sound as it is not positively prepared, not justified, not effective and inconsistent with the NPPF.
27. In Jewson Holdings' view LPP1 should be delayed pending agreement on both the scale of Oxford's unmet needs and its distribution – as noted above this is now expected within a relatively short timescale (by March 2016).
28. Jewson Holdings is aware that other authorities have proposed early review mechanisms and may even specify a time period within which such a review will be undertaken (e.g. within 2 years). Notwithstanding that Jewson Holdings do not consider this a sound approach, if the Inspector considers the approach of Policy CP2 to be sound, it is suggested that the policy is modified to at least include a timescale for formally publishing a Local Plan Review beyond which LPP1 will be considered out of date.
29. If the Inspector considers the approach of Core Policy 2 to be sound, Jewson Holdings consider that the failure to impose a timescale will result in a further failure to address Oxford's unmet needs in a timely manner. As such LPP1 will be ineffective and contrary to the NPPF.