

Vale of White Horse Local Plan 2031 Part 1

Examination

Statement by Vale of White Horse District Council

Stage 1 – Main Strategic Issues

Matter 4 – Unmet Housing Need

August 2015

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Inspectors Question:

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?

4.1.1 The Council is confident its approach to accommodating any unmet housing needs that cannot be met elsewhere is soundly based, fully accords with national policy, and is fully consistent with the wider Oxfordshire strategies for growth and current Government Policy.

Positively prepared

4.1.2 The Vale of White Horse fully accepts the importance of seeking to meet its own objectively assessed development and infrastructure requirements, together with any unmet need from neighbouring authorities, where it is reasonable to do so and consistent with achieving sustainable development, as set out in national policy¹. The Vale of White Horse Local Plan does seek to fully meet the Objectively Assessed Need for the Vale within the Vale district. Furthermore, a commitment is made to ensure unmet need is addressed in accordance with Core Policy 2 (see below).

4.1.3 However, the need to address unmet need must be seen in the context of the strategic needs for Oxfordshire as a whole, and the Government's commitment to support accelerated housing and economic growth, particularly in the next five years. It is therefore important that housing delivery is supported in the short term by progressing the Vale Local Plan quickly, whilst ensuring that unmet need is also addressed in a timely manner.

Justified

4.1.4 The wider strategic approach to Oxfordshire is pertinent in this regard. The Oxford City Deal highlights the importance of 'accelerating' the delivery of homes, which is 'fundamental' to the delivery of innovation-led growth. One of the main objectives for the Oxfordshire Strategic Economic Plan is to 'provide quality homes' that are needed to 'support growth'. The Vale of White Horse houses much of Science Vale, the southern arm of the Oxfordshire Knowledge Spine, where 15,850² jobs

¹ **EIP Library Ref: LNP02** - Communities and Local Government. (2012) National Planning Policy Framework – Paragraph 182. Available at: http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=447616931&CODE=260043628407B2562AD80BF85476EB61

² **EIP Library Ref: HOU02** - GL Hearn Ltd. (2014). Science Vale Housing and Employment Study. Available at: http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=454436530&CODE=18AD275F4CA886532CA39D55D2EE17C9

are projected up to 2031 along with over £300³ millions investment in new infrastructure over the plan period.

- 4.1.5 It is therefore essential the Vale Local Plan supports accelerated housing delivery within Science Vale. As described in the Council's Statement to Matter 3, the Local Plan is fully meeting the identified housing need within Science Vale. It is clear therefore that any delay in bringing the Local Plan forward, by around 18 months or more, could significantly jeopardise economic led growth of strategic importance at an Oxfordshire and national level.

Effective

- 4.1.6 For the reasons set out above, the joint approach to addressing unmet housing needs for Oxford City, which was agreed by the Oxfordshire Growth Board, is clearly appropriate; it facilitates the accelerated delivery of housing within the Vale of White Horse, and avoids any delay to addressing unmet need. A process to address unmet housing need has been addressed at both officer and member level in partnership with other local housing and planning authorities⁴. This approach has been endorsed by means of an unopposed motion at Full Council and further broad plan making principles and have been endorsed by Cabinet.

- 4.1.7 The Cherwell Local Plan Examination provides a recent and local precedent for the same approach. The Inspectors Report set out a number of pertinent matters, which include:

- 'It is unrealistic to expect that this district (Cherwell) could reasonably provide for all of any unmet need arising from the city of Oxford's lack of capacity to meet all of its own requirements'⁵
- 'Clearly, a joint approach involving all the relevant Councils is required on a co-operative basis to fully address the OAN's of the whole county as one overall strategic housing market area'⁶, and
- 'Such a process could only be harmed by Cherwell not meeting its own full district OAN, but if it does then that will at least mean that the pressures on the city of Oxford will not be made any worse by a failure to deliver the necessary level of new housing in this district

³ **EIP Library Ref: DLP07** - Vale of White Horse District Council (2014). Infrastructure Delivery Plan. Available at: http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=454436231&CODE=03369568B89589563F211C327DEDF621

⁴ **EIP Library Ref: DTC01** Oxfordshire Growth Board (N/A). Oxfordshire Statement of Cooperation. Available at: <https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/ourworkwithcommunities/oxfordshirepartnership/spatialplanninginfrastructure/OxfordshireStatementofCooperation.pdf>

⁵ **EIP Library Ref: DTC06** - The Planning Inspectorate (2015). Report to Cherwell District Council. Ref. PINS/C3105/429/4. Available at: http://www.cherwell.gov.uk/media/pdf/d/9/Cherwell_Local_Plan_Inspector's_Report_with_Main_Modifications_2015.pdf

⁶ **EIP Library Ref: DTC06** -The Planning Inspectorate (2015). Report to Cherwell District Council. Ref. PINS/C3105/429/4. Available at: http://www.cherwell.gov.uk/media/pdf/d/9/Cherwell_Local_Plan_Inspector's_Report_with_Main_Modifications_2015.pdf

(Cherwell) and the sustainable development of the county as whole will be materially assisted'⁷.

- 4.1.8 The Inspector's Report also confirms that it is appropriate for the Cherwell Plan to proceed on the basis proposed (i.e. the same approach being proposed by the Vale of White Horse), providing there is a 'firm commitment from the Council to play its part in addressing the needs of Oxford City' through the joint process in the near future. The Inspector was satisfied that the 'duty-to-co-operate' had been met and that the formal arrangement in place between the Oxfordshire Councils to fully address the results of the 2014 SHMA would 'materially assist' the on-going co-operation.
- 4.1.9 The Council is aware that modifications to policy have been made to the Cherwell Local Plan through the examination process following submission of the Vale of White Horse Local Plan 2031 in March 2015. On this basis, and informed by ongoing co-operation with the other Oxfordshire authorities, the Vale of White Horse has proposed a similar amendment to policy (set out in Statement 4.4), which has been agreed with Oxfordshire County Council through a Statement of Common Ground.

Consistent with national policy

- 4.1.10 The recent House of Commons Written Statement made it clear how Government intends to 'accelerate house building over the next five years, provide certainty for local residents and enterprises, and contribute to the Government's long-term economic plan'⁸. The Statement makes it clear that Local Plans should have been produced by 'early 2017' and that commitment to an 'early review' of a Local Plan may be appropriate to ensure a Local Plan is not unnecessarily delayed⁹. It is therefore clear that an early review of a Local Plan is considered by Government to be an appropriate mechanism to ensure housing delivery is not delayed.
- 4.1.11 Furthermore, the approach is consistent with the National Planning Policy Framework (NPPF), which for example states that planning authorities should:

⁷ **EIP Library Ref: DTC06** - The Planning Inspectorate (2015). Report to Cherwell District Council. Ref. PINS/C3105/429/4. Available at: http://www.cherwell.gov.uk/media/pdf/d/9/Cherwell_Local_Plan_Inspector's_Report_with_Main_Modifications_2015.pdf

⁸ **EIP Library Ref: LNP18** - Department for Communities and Local Government (2015). House of Commons: Written Statement made by: Minister of State for Housing and Planning, Brandon Lewis. Available at: <http://www.parliament.uk/documents/commons-vote-office/July%202015/21%20July/8-Communities-and-Local-Government-Local-Plans.pdf>

⁹ **EIP Library Ref: LNP18** - Department for Communities and Local Government (2015). House of Commons: Written Statement made by: Minister of State for Housing and Planning, Brandon Lewis. Available at: <http://www.parliament.uk/documents/commons-vote-office/July%202015/21%20July/8-Communities-and-Local-Government-Local-Plans.pdf>

- boost significantly the supply of housing¹⁰, and
- should ensure that their strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals¹¹.

¹⁰ **EIP Library Ref: LNP03** - Communities and Local Government (2012). National Planning Policy Framework - Paragraph 47. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹¹ **EIP Library Ref: LNP03** - Communities and Local Government (2012). National Planning Policy Framework – Paragraph 158. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Inspectors Question:

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?

- 4.2.1 The Council is confident that the scale of unmet housing for Oxford City and the most appropriate way of providing for that need will be concluded in accordance with the Growth Board timetable, thus allowing a partial Local Plan Review to commence in accordance with the proposed changes to Core Policy 2 (Statement 4.4).
- 4.2.2 The Growth Board Paper (dated 30th July) concludes that the proposed timetable is 'achievable'¹². This approach is consistent with the approach being taken by Cherwell District Council as set out in the Planning Inspectors Report and has been agreed with Oxfordshire County Council through our Statement of Common Ground¹³.
- 4.2.3 The Council continues to work positively with the other Oxfordshire authorities through the joint approach. The timetable for addressing unmet need has been agreed and this confirms that work on Local Plan review's can commence by March 2016. The commitment to commence a partial review of the Local Plan is set out within the proposed amendments to Core Policy 2.

¹²Available at <https://www.oxfordshire.gov.uk/cms/content/oxfordshire-growth-board>

¹³ Vale of White Horse District Council & Oxfordshire County Council (2015). Vale of White Horse Local (Part 1) 2011- 2031 Stage 1 September 2015. Statement of Common Ground between Vale of White Horse District Council and Oxfordshire County Council. Available at: <http://www.whitehorsedc.gov.uk>

Inspectors Question:

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?

4.3.1 The Council is confident that a contribution to unmet need can be accommodated within the Vale of White Horse District without any need to change, significantly or otherwise, the proposed Spatial Strategy, policies or existing allocations and this confidence will be strengthened through the Cabinet endorsed process. Indeed, the strength of the strategy is that it is sufficiently flexible to accommodate any likely increased requirement, thus demonstrating that it is the most appropriate for the area.

4.3.2 The proposed distribution of housing set out in the Local Plan has been demonstrated to be appropriate and soundly based (this is described more fully in Statement 3)¹⁴. The key strengths of the approach are:

- 72 % of growth is located at Market Towns and Local Service Centre's thus demonstrating a clear fit with the Settlement Hierarchy
- 74 % of growth is located within Science Vale thus demonstrating a strong fit with the Oxfordshire Strategic Economic Plan
- the inclusion of a mix of sites, in terms of size and geography, makes a significant contribution towards housing 'delivery' thus demonstrating consistency with both national policy and the Oxfordshire Strategic Economic Plan, which states that housing delivery is 'fundamental' to support innovation-led growth
- the inclusion of the Abingdon-on-Thames and Oxford Fringe Sub-Area reflects the geographical proximity of Oxford City and the functional relationship between these areas, and
- strong consistency with the core principles of national policy, including for example, ensuring access to sustainable modes of transport.

4.3.3 It is also the case that the plan approach is flexible, retaining some potential to accommodate housing for Oxford City unmet need, without any compromise to the proposed approach to housing distribution.

4.3.4 It is of course difficult to answer the question fully, without first understanding what the actual quantum for unmet housing need for Oxford City is, and without allowing the joint approach to addressing this matter to reach a conclusion. Furthermore, there must be no

¹⁴ Vale of White Horse District Council (2015) Statement by the Vale of White Horse District Council. Stage 1 Main Strategic Issues. Matter 3 – Spatial Strategy and Housing Supply Ring Fence.

assumption that the Oxfordshire authorities will automatically be able to accommodate all identified unmet need for Oxford City. The NPPF states that plans should 'seek to meet objectively assessed' requirements including unmet requirements from neighbouring authorities 'where it is reasonable to do so and consistent with achieving sustainable development'¹⁵.

- 4.3.5 The Planning Inspectors Report into the Cherwell Local Plan states that it is considered 'unrealistic that this district (Cherwell) could reasonably provide for all of any unmet need arising from the city of Oxford's lack of capacity to meet all of its own requirements'¹⁶, which the Vale of White Horse District suggests would apply equally to the Vale.
- 4.3.6 The identified Objectively Assessed Need for housing for Oxford City is between 24,000 and 32,000, the Oxford City Strategic Housing Land Availability Assessment (SHLAA) identifies capacity for around 10,000 homes, thus leaving an unmet need in the range of 14,000 to 22,000¹⁷.
- 4.3.7 The Vale of White Horse, South Oxfordshire and Cherwell commissioned an independent assessment of the capacity of Oxford City for additional housing and identified the potential for 16,000 homes¹⁸. This is referenced here purely for the purposes of illustration; it is not appropriate to discuss the detail of the joint approach to addressing unmet need in this Statement.
- 4.3.8 However, for the purposes of illustration, the range of unmet need may be considered likely to fall within the following scenarios:
- a. low: 8,000 to 14,000 (24,000 less either 10,000 or 16,000)
 - b. mid: 12,000 to 18,000 (24,000 less either 10,000 or 16,000), and
 - c. high: 16,000 to 22,000 (24,000 less either 10,000 or 16,000).
- 4.3.9 If it is assumed that each district accommodates up to one quarter of the unmet need¹⁹ we might conclude that the range of Oxford City

¹⁵ **EIP Library Ref: LNP03** - Communities and Local Government (2012). National Planning Policy Framework. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶ **EIP Library Ref: LNP13** - The Planning Inspectorate (2015). Report to Cherwell District Council. Ref. PINS/C3105/429/4. Available at: http://www.cherwell.gov.uk/media/pdf/d/9/Cherwell_Local_Plan_Inspector's_Report_with_Main_Modifications_2015.pdf

¹⁷ **EIP Library Ref: HOU09** - HDH Planning & Development Ltd (2014). Strategic Housing Land Availability Assessment (SHLAA). Available at: http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=454436467&CODE=797FC7FA2DA0E6E2946648EC994D592B

¹⁸ **EIP Library Ref: DTC06** - 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>

¹⁹ The actual level of unmet need to be accommodated within each district will be determined through the Duty-to-Cooperate process being driven by the Oxfordshire Growth Board.

unmet housing need for the Vale to accommodate would be unlikely to be less than 2,000 and very unlikely to be more than 5,500.

- 4.3.10 The Vale Local Plan 2031 Part 1 is based on a comprehensive suite of technical evidence, which includes the Vale SHLAA, a local Green Belt Review of the Oxford Green Belt within the Vale of White Horse, an assessment of housing delivery, detailed analysis of potential strategic site options and Sustainability Appraisal.
- 4.3.11 The Vale are also contributing fully to the joint approach to addressing unmet need and this has started to involve the use of existing evidence to assess high level options for how unmet need could be accommodated. This is discussed further in the Vale Cabinet Paper dated 7 August 2015²⁰. As a stating point, the three sub-areas set out in the Vale Local Plan 2031 Part 1 were considered for their suitability to accommodate unmet need.
- 4.3.12 The next stage of work to inform the joint approach is to consider more spatially discrete development options for their potential to accommodate unmet need. This work is ongoing and it is not appropriate to discuss the detail here. Nonetheless, a high level assessment would indicate that at the very least, a significant element of this unmet need could be provided for consistently with the spatial strategy, for example by means of urban extensions to existing sustainable settlements.
- 4.3.13 It can therefore be demonstrated that not only is the proposed Spatial Strategy sufficiently flexible to allow an appropriate quantum of unmet housing need for Oxford City to be accommodated within the Vale, in sustainable locations that relate well to Oxford City; but, given the robustness of the Spatial Strategy overall and its highly consistent fit with wider strategies, including the Oxfordshire Strategic Economic Plan, that considering alternative Spatial Strategies would be harmful.

²⁰**EIP Library Ref: LNP18** - Vale of White Horse District Council (2015) Cabinet Report - Planning to address Oxford unmet need in Vale of White Horse. Available at:
<http://democratic.whitehorsedc.gov.uk/documents/s26976/Report.pdf>

Inspectors Question:

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?

- 4.4.1 The Council is mindful that since submitting the Local Plan in March 2015, an Inspectors Report has been published into the Cherwell Local Plan Examination²¹. The Cherwell Inspectors Report contains a proposed modification to policy relating to how unmet housing need for Oxford city should be addressed. The principle change is to clarify the timing of a partial Local Plan review and the mechanism for addressing unmet need.
- 4.4.2 The Council have continued to work positively with the other Oxfordshire authorities in the joint approach to addressing unmet need and have also prepared Statement's of Common Ground with a number of key stakeholders, including Oxfordshire County Council.
- 4.4.3 On this basis, the Council believe that making a consistent change to Core Policy 2, to the change made to the Cherwell Local Plan through their examination process, would provide useful additional clarity and consistency in approach across Oxfordshire (**Appendix 1**). This proposed change has been agreed with Oxfordshire County Council in our Statement of Common Ground²².

²¹ **EIP Library Ref: LNP13** The Planning Inspectorate (2015). Report to Cherwell District Council. Ref. PINS/C3105/429/4. Available at: http://www.cherwell.gov.uk/media/pdf/d/9/Cherwell_Local_Plan_Inspector's_Report_with_Main_Modifications_2015.pdf

²² **EIP Library Ref: SCG01** - Vale of White Horse District Council & Oxfordshire County Council (2015). Vale of White Horse Local (Part 1) 2011- 2031 Stage 1 September 2015. Statement of Common Ground between Vale of White Horse District Council and Oxfordshire County Council.

Appendix 1: Proposed amendments to Core Policy 2.

Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire

The Council will continue to fulfil its statutory **work under the** 'duty-to-cooperate by working effectively with all the other Oxfordshire local authorities in **on an ongoing basis to address** accordance with the Oxfordshire Statement of Cooperation to ~~seek to jointly meet~~, in full the objectively assessed need for economic and housing growth across the Oxfordshire housing market area **and to meet joint commitments such as the Oxford and Oxfordshire City Deal (2014).**

As a first step Vale of White Horse District Council has sought to accommodate the housing need for Vale of White Horse District in full in the Vale of White Horse Local Plan 2031 Part 1. The 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) identifies a significant level of housing need in Oxfordshire. The Council recognises that Oxford City may not be able to accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary. **At the time of preparing this Local Plan the urban capacity of Oxford is as yet unconfirmed.**

~~Whilst the extent to which Oxford City can meet its own needs is robustly tested and agreed, the Council will first seek to meet its own housing needs in full, to help ensure that the needs of both the district and the housing market area as a whole are met as quickly as possible.~~

~~In tandem,~~ The Council will continue to work jointly **and proactively** with **all of** the other Oxfordshire local authorities **and through the Oxfordshire Growth Board to** address any unmet housing need. This will include assess ~~ing~~ all reasonable spatial options, including the release of brown field land, the potential for new settlements and a full strategic review of the ~~whole~~ **boundaries** of the Oxford Green Belt. These issues are not for the Council to consider in isolation. These options will need to be undertaken in accordance with national policy, national guidance, the **Strategic Environmental Assessment (SEA)** ~~Environmental Assessment of Plans and Programmes Regulations~~, and the Habitats Regulations Assessment **(HRA)** to establish how and where any unmet need might best be accommodated within the Oxfordshire Housing Market Area.

~~If, following this joint work, it is identified and agreed, either through the Oxfordshire growth Board or through an adjoining local plan examination, that any unmet housing need is required to be accommodated within this district, the Council will either:~~

- ~~undertake a full or focused partial review of the Local Plan 2031 or~~
- ~~allocate appropriate housing sites through a subsequent development plan document in conformity with the Spatial Strategy set out in the Local Plan 2031.~~

~~The appropriate approach will depend on the scale of the unmet need to be accommodated.~~

Joint work will need to comprehensively consider how spatial options could be supported by necessary infrastructure to ensure an integrated approach to the delivery of housing, jobs and services. Full public consultation will be central to a 'sound' process and outcome. If this joint work reveals that Vale of White Horse and other Districts need to meet additional need for Oxford, this will trigger a partial review of the Local Plan, to be completed within two years of adoption, and taking the form of the preparation of a separate Development Plan Document for that part of the unmet need to be accommodated in the Vale of White Horse District. The Council will engage in joint working on supporting technical work such as countywide Sustainability Appraisal as required to support the identification of a sustainable approach to meeting agreed, unmet need.