

**David Edwards**

Direct Line: 01865 252394

Fax: 01865 252256

Email: [dedwards@oxford.gov.uk](mailto:dedwards@oxford.gov.uk)Website: [www.oxford.gov.uk](http://www.oxford.gov.uk)**Chief Executive's Office**

Town Hall

Oxford

OX1 1BX

Switchboard: 01865 249811

**www.oxford.gov.uk**

Ian Kemp  
Programme Officer  
*By email*

7<sup>th</sup> October 2015

Dear Sir

At the hearing session on Tuesday 22<sup>nd</sup> September the Vale of White Horse (VWHDC) provided new information stating that they had identified sites to meet Oxford's unmet housing needs. They believed that these sites could be accommodated without significant alteration to the proposed draft Local Plan, and in particular avoid the need to review its spatial strategy or consider further changes to the Green Belt boundary. VWHDC also stated that it anticipated having an 8 year housing land supply at the date of Plan's adoption. The Inspector requested that VWDC and the City Council meet to discuss their respective positions in the light of this new information.

Officers from the Councils met on Thursday 24<sup>th</sup> September, which helped to clarify the position. In summary, no sites had been assessed or alternatives considered with respect to meeting Oxford's current and future unmet need. Without an assessment of the sites and the alternatives this cannot be an appropriate approach to the distribution of Oxford's current and future unmet need. Given the acknowledged strategic importance of meeting Oxford's unmet need and the recognised scale of the requirement (accepting a precise number has not finally been agreed), we believe that the draft Local Plan which ignores these is unsound.

Second, this approach ignores the significant strategic infrastructure implications, given the high levels of commuting to Oxford, and the need for critical mass to plan and fund essential infrastructure. The County Council has also repeated that it does not accept VWHDC's view that the current Plan's infrastructure proposals can accommodate additional housing, which includes Oxford's current and future unmet need.

Third, this approach presents considerable continuing uncertainty and risk for communities in settlements, including those considering neighbourhood plans, as they may be required to take part of Oxford's unmet need. The approach is not justified or effective.

More generally, VWHDC gave us to understand that the Oxford unmet need could be met from the following sources of supply:

- Sites currently in the Green Belt and proposed for re-designation to non-Green Belt (but not allocated)
- Sites identified in the current SHLAA but not proposed for allocation in LPP1, and in excess of the Vale's own remaining OAN
- Anticipated higher than expected delivery in the early part of the Plan period on allocated and non-allocated sites.

None of these sites has been assessed as to their suitability to meet Oxford's unmet need, or alternative options considered. The sites in the Green Belt have also not been assessed as suitable, available or deliverable, and there is no evidence to support higher than expected housing delivery and a change from current trends. Without assurance on all these points there is no substance in the assertion that there will be an 8 year land supply should the current Plan be adopted.

Only one specific site was referenced in our discussion: Valley Park site, to the west of Didcot adjacent to the A34. VWHDC has told us that this has a planning application for 4,500 homes, which is substantially above the 2,500 homes proposed for allocation in LPP1. The SEA implications have not been considered in increasing the allocation on this scale. The site is entirely unsuitable for meeting Oxford's needs. It is some 13 miles from Oxford, and adjoins the A34 Milton interchange. The development will not deliver additional housing for Oxford early in the Plan period and in the timescale required. The location has no functional relationship with Oxford and will promote commuting by unsustainable car travel to Oxford. The subsequent suggestion by VWHDC that the station is close (we measure the distance as approx. 2.5 miles), and that rail will be the preferred travel mode is completely contrary to all the evidence, and most of Oxford's and indeed Oxfordshire's employment opportunities are not directly accessible by rail.

In conclusion, VWHDC proposes to restrict the consideration of Oxford's unmet need to their current restrictive spatial strategy which has been developed in isolation and without any reference to the needs of Oxford or the wider area, and to rely on an oversupply of housing on sites that have not been assessed against their ability to meet Oxford's housing needs sustainably. This is not an appropriate or an effective process to meet Oxford's current and future unmet housing need. This process also seeks to set aside the joint work of the Oxfordshire Growth Board joint work where it does not accord with the Vale's own restricted spatial strategy. It is far better to resolve the issue through the proper Duty to Co-operate process, based on sound sustainability principles aligned with the NPPF, and we have requested this through a short deferral of the Local Plan examination as it can be achieved in a reasonable timescale with your support.

Yours faithfully



**David Edwards**  
**Executive Director**