

WEST OXFORDSHIRE DISTRICT COUNCIL

CABINET: WEDNESDAY 15 NOVEMBER 2017

**COMMENTS ON THE SOUTH OXFORDSHIRE AND VALE OF WHITE HORSE
LOCAL PLANS**

REPORT OF THE HEAD OF PLANNING AND STRATEGIC HOUSING

(Contact: Giles Hughes, Tel: (01993) 861000)

(The Cabinet decision on this matter will be a resolution)

1. PURPOSE

To consider the Council's response to the Local Plan consultations by South Oxfordshire and Vale of White Horse District Councils.

2. RECOMMENDATIONS

- (a) That the Cabinet welcomes the positive steps being taken by Vale of White Horse District Council to address the issue of Oxford City's unmet housing need through Part 2 of its Local Plan;
- (b) That the Cabinet raises concerns over the approach of South Oxfordshire District Council in its emerging Local Plan to not follow the Growth Board agreed apportionment for meeting Oxford City's unmet housing need;
- (c) That the Head of Planning and Strategic Housing be authorised to prepare and submit representations on the two consultations, following consultation with the Cabinet Member for Strategic Planning, taking into account the points included in paragraph 5.1 below and subject to any other comments from Cabinet; and
- (d) That, for the reasons specified in paragraph 3.38 below, and in accordance with the provisions in the Overview and Scrutiny Rules in Part 4 of the Constitution, the ability to call-in this item for further consideration be waived.

3. BACKGROUND

- 3.1. In May, Cabinet considered a report outlining the two separate Local Plan consultations that were being carried out by South Oxfordshire District Council and by Vale of White Horse District Council in late spring of this year. The Council subsequently submitted comments to the Vale of White Horse on their Local Plan Part 2, and also submitted a joint response with Cherwell District Council and Oxford City Council to South Oxfordshire District Council on their new Local Plan.
- 3.2. South Oxfordshire District Council is developing a new Local Plan to set out their vision for South Oxfordshire up to 2033. On 11 October 2017 the Council published the final publication version of their Local Plan and consultation on this plan closes on the 30 November 2017. One of the issues that it addresses is that of the additional housing provision needed to help meet part of Oxford City's unmet housing need, which totals around 15,000 homes. Following this consultation South Oxfordshire intends to submit its plan to the Secretary of State so that it can be examined by an Inspector from the Planning Inspectorate.
- 3.3. Separately, Vale of White Horse District Council has been preparing Part Two of their Local Plan. Vale of White Horse adopted Part One of their Local Plan in December 2016. Part One sets out the major housing development sites for the Vale until the year 2031,

along with the employment sites and infrastructure needed to support them. Part Two allocates some further housing sites, provides detailed policies that will be used to determine planning applications, and also shows how Vale of White Horse will support Didcot Garden Town and deliver the housing for Oxford that they have agreed to provide. A Preferred Options consultation draft of Part Two was published on the 11th October 2017 and is open for consultation until 22 November 2017. Again, following this consultation the plan will be submitted to the Secretary of State for examination.

Oxfordshire Strategic Housing Market Assessment (SHMA)

- 3.4. The Oxfordshire Strategic Housing Market Assessment (SHMA), published in 2014, sets out the future housing needs of Oxfordshire for the period 2011-2031. The SHMA identifies an objectively assessed housing need of between 14,500 to 16,500 dwellings in South Oxfordshire, and an objectively assessed housing need of 20,560 dwellings in Vale of White Horse.
- 3.5. One of the key issues identified in the SHMA is that there is a high level of housing need in Oxford of between 24,000 to 32,000 homes. All parties agree that Oxford is not able to meet all of this housing need within its own boundaries and a 'working assumption' was agreed that around 15,000 homes will need to be delivered outside the City in adjoining Districts.

Oxfordshire Growth Board

- 3.6. The Localism Act 2011 places a Duty to Co-operate on Local Planning Authorities (LPA). This requires them to engage constructively, actively and on an on-going basis in the preparation of development plan documents where this involves strategic matters. Assisting Oxford with its unmet housing need is a key element of the Duty to Co-operate in Oxfordshire.
- 3.7. The Oxfordshire Growth Board process to apportion the unmet housing need from Oxford City concluded in September 2016. This followed an extensive technical work programme involving officers from the four District Councils, Oxford City Council, and Oxfordshire County Council. This work programme evaluated a range of strategic options available to help meet Oxford City's unmet need. The following apportionment was agreed by the Growth Board on 26 September 2016.

	Proportion of unmet need apportioned
Cherwell DC	4,400
Oxford City Council	550
South Oxfordshire DC	4,950
Vale of White Horse DC	2,200
West Oxfordshire DC	2,750
Total	14,850

- 3.8. This apportionment was supported by all of the Councils apart from South Oxfordshire.
- 3.9. The figure of 4,950 dwellings identified for South Oxfordshire was based upon a positive technical evaluation of strategic options on land south east of Grenoble Road, at Wick Farm, and adjacent to Thornhill Park & Ride.
- 3.10. The Vale of White Horse figure of 2,200 dwellings was based upon a positive technical evaluation of strategic options on land at Abingdon North, at Botley, and at Cumnor.

South Oxfordshire Local Plan 2011 -2033 Final Publication Version

- 3.11. Historically, growth in South Oxfordshire has been largely focussed upon Didcot and the market towns of Thames, Wallingford and Henley-on-Thames. Other than Wallingford, these towns are located towards the boundary of the District. The continued focus on the periphery of the district is perceived by South Oxfordshire to have led to a reduction in development to support the investment in services and infrastructure within the heart of their District. The new Local Plan seeks to build upon the existing settlement hierarchy and actively create a pattern of development central to the area. It identifies strategic levels of growth at four locations connecting through the central area of the District at Berinsfeld, Chalgrove, Culham and Wheatley.
- 3.12. South Oxfordshire considers that 17,050 new homes are required to meet the District's own needs during the plan period 2011 to 2033. This equates to 775 homes a year, which reflects the midpoint of the recommended range in the SHMA (extended on a pro-rata basis from 2031, which is the end date of the SHMA, to 2033).
- 3.13. In addition the South Oxfordshire Local Plan commits to an additional 3,750 new homes contributing towards Oxford City's unmet housing need over the plan period up to 2033. This figure falls short of the South Oxfordshire apportionment identified by the Growth Board (4,950 homes by 2031).
- 3.14. In total therefore, South Oxfordshire is aiming to meet a target of 20,800 homes by 2033. To meet this requirement the Local Plan identifies a housing supply of 22,563 homes.
- 3.15. South Oxfordshire state that the housing which contributes towards Oxford's needs is to be delivered in accordance with South Oxfordshire's own spatial strategy and is not identified at any one site or location. This housing contribution will start in 2021/22. The level of Oxford's unmet housing need will be monitored and a partial review of the South Oxfordshire Local Plan undertaken when Oxford City's Local Plan is adopted, taking into account the most up-to-date evidence available at that time.
- 3.16. South Oxfordshire proposes the following overall spatial strategy:
- Significant development at Science Vale including strategic scale development at Didcot Garden Town and Culham;
 - Strategic scale development at Chalgrove and Berinsfield;
 - Major growth at Henley, Thame, Wallingford and Wheatley;
 - Growth in the larger villages of Cholsey, Crowmarsh Gifford, Goring, Nettlebed, Sonning Common, Watlington and Woodcote in order to support their roles as local service centres;
 - Limited amounts of growth in other villages; and
 - Protection and enhancement of the countryside, particularly those areas within the AONBs and Oxford Green Belt.
- 3.17. To deliver its overall spatial strategy South Oxfordshire proposes a limited number of new strategic allocations at Culham Science Centre (3,500 homes), Berinsfield (1,700 homes), Chalgrove Airfield (3,000 homes), and major development at the Wheatley Campus (300 homes). The Culham Science Centre, Berinsfield and Wheatley Campus sites are within existing Green Belt boundaries. In Didcot, 6,500 new homes are planned on sites largely carried over from the adopted Core Strategy. Allocations in other settlements will be largely delivered through Neighbourhood Development Plans.
- 3.18. Policy H9 in the South Oxfordshire Local Plan seeks at least 40% of new homes to be affordable on sites above 10 dwellings. No details are provided in the plan of how any

new affordable housing in South Oxfordshire will contribute towards Oxford's unmet affordable housing needs, or how it is intended that the two housing authorities will work together to meet these needs. The high level of housing need identified in the SHMA for Oxford was largely driven by the very high level of affordable housing need in the City. The SHMA figures also assume that 50% affordable housing will be delivered on sites linked to Oxford's needs. It is unclear that South Oxfordshire can contribute effectively towards Oxford's affordable need and this could ultimately lead to additional development pressure in other Districts.

- 3.19. The new Local Plan also proposes to safeguard land for a range of key transport improvements: including a Culham to Didcot Thames River Crossing; Didcot Northern Perimeter Road; Science Bridge Didcot; bypasses for Benson, Clifton Hampton, Southern Abingdon, Stadhampton and Watlington; and a new Park and Ride site at Sandford to the south-east of Oxford.
- 3.20. In the joint comments submitted by West Oxfordshire, Cherwell and Oxford City on the earlier draft of South Oxfordshire's new Local Plan concerns were raised over the departure from the agreed Growth Board apportionment, which raises issues under the duty to cooperate, and which is already leading to pressure for additional housing in other Districts to make up the shortfall. The comments also asked for clarity on which specific housing sites within South Oxfordshire will contribute towards Oxford's needs. It is important to consider the relationship of sites with Oxford when considering how well they contribute to helping meet Oxford's unmet housing needs. South Oxfordshire has not made any significant changes to address these comments.

Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites – Publication Version

- 3.21. The adopted Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies sets out the 'spatial strategy' and strategic policies for Vale of White Horse. The 'spatial strategy' has three main strands and is not changed by the Part 2 document. The main strands are:
 - Growth within the Science Vale area;
 - Reinforcement of the service centre roles of the main settlements across the district; and
 - Thriving villages and rural communities whilst safeguarding the countryside and village character.
- 3.22. The Vale of White Horse Local Plan Part 1 established three Sub-Area Strategies to ensure the plan is locally distinctive and focussed on each part of the district. The three sub-areas are:
 - Abingdon-on-Thames and Oxford Fringe;
 - South East Vale; and
 - Western Vale.
- 3.23. The housing requirement for the Vale of White Horse, as set out in the Local Plan Part 1, is 20,560 homes for the Vale's own needs up to 2031 and 2,200 homes to help address Oxford City's unmet housing needs over the same period. In total therefore, Vale of White Horse is aiming to meet a target of 22,760 homes by 2031. To meet this requirement the Local Plan Part 2 identifies a housing supply of 24,748 homes.
- 3.24. The publication version of the Part 2 plan states that the agreed quantum of Oxford's unmet housing need will be met within the Abingdon-on-Thames and Oxford Fringe Sub-

Area. This recognises that housing within this Sub-Area is relatively accessible to Oxford, with more frequent and reliable public transport linkages, and therefore is considered appropriate to contribute to the unmet housing needs of Oxford City. The following specific allocations within the Sub-Area are listed as close to, or accessible to, Oxford:

- North Abingdon-on-Thames (950 homes)
- North-West Abingdon-on-Thames (200 homes)
- North-West Radley (240 homes)
- South of Kennington (270 homes)
- Dalton Barracks (1,200 homes)

- 3.25. However, the Part 2 plan does not ring fence any of these specific allocations for the sole purpose of addressing Oxford's unmet housing need. The site at Dalton Barracks is within current Green Belt boundaries.
- 3.26. The Local Plan Part 2 also proposes additional housing allocations at East Hanney (130 homes), Kingston Bagpuize (600 homes), Marcham (90 homes), Harwell Campus (1,000 homes), and Grove (400 homes).
- 3.27. The adopted Vale of White Horse Local Plan Part 1 sets out a requirement for 35% affordable housing on sites over 10 dwellings in size. The Part 2 plan states that allocations will be made in accordance with an approach to be agreed between Vale of White Horse and Oxford City. As stated in para 3.18 the high level of housing need identified in the SHMA for Oxford was largely driven by the very high level of affordable housing need in the City, and an assumption was made that 50% affordable housing will be delivered on sites linked to Oxford's needs. Therefore there is a risk that the approach adopted by the Vale might not contribute adequately towards Oxford's affordable housing need.
- 3.28. The Part 2 plan also updates the area to be safeguarded for the possible future provision of the Upper Thames Reservoir. It also safeguards land for a range of additional transport improvements including Park and Ride sites at Cumnor and Lodge Hill, a South Marcham Bypass for the A415, and the re-opening of the railway station at Grove.

Issues for West Oxfordshire

- 3.29. Vale of White Horse and West Oxfordshire share a common boundary along the Rover Thames. There are major connections between Witney and Abingdon (A415) and between Witney and Faringdon (A4095). As a consequence there is significant interaction between the economies of the two Districts. There is a weaker level of interaction between the South Oxfordshire and West Oxfordshire economies given their locations on opposite sides of Oxford.
- 3.30. Vale of White Horse is proposing significant additional allocations close to the A415 at Dalton Barracks (1,200 homes), and at Kingston Bagpuize (600 homes). Transport measures associated with these developments include an A425 Bypass at Kingston Bagpuize brought forward as part of the development there, and the safeguarding of land for a Marcham Bypass. However, the constraint at Newbridge, caused by the crossing of the Thames will remain.
- 3.31. The unmet housing need of Oxford City is a major strategic planning issue for Oxfordshire. It is important that all Oxfordshire local planning authorities make appropriate provision for additional housing in order to help meet this need. Vale of White Horse District Council are proposing to take forward the agreed Oxfordshire Growth Board apportionment, but South Oxfordshire District Council have proposed a

different lower figure for their district. This raises issues under the duty to cooperate for South Oxfordshire as the consequences of this approach have not been worked through with neighbouring authorities. Some respondents to the West Oxfordshire Local Plan have argued that West Oxfordshire should take additional growth because South Oxfordshire is not proposing to meet its share.

- 3.32. It is important that housing that is intended to contribute towards meeting Oxford City's unmet housing need is accessible to Oxford, with frequent and reliable public transport linkages. This was a key consideration of the work undertaken to agree the proposed apportionment of the unmet need. Otherwise the planned homes may not serve the needs of future residents and it may place an additional strain on transport infrastructure.
- 3.33. The Vale of White Horse Local Plan Part 2 identifies that in the Vale of White Horse their contribution towards Oxford City's unmet need will be made in the sub-area of their District closest to Oxford, and a list of sites that are considered suitable have been identified although they are not specifically allocated for this role. South Oxfordshire does not identify any specific locations or areas that will contribute towards Oxford City's need, which means that housing in any location in South Oxfordshire might be counted towards this need even though many locations may be relatively inaccessible from Oxford. This may create additional pressure for development in those parts of West Oxfordshire close to Oxford.
- 3.34. The high level of housing need in Oxford is largely driven by the need for affordable housing. Another strong reason for clarity on where Oxford's unmet needs are to be delivered is to allow a proper assessment of how sites can contribute towards this affordable housing need. The affordable housing policies for Vale of White Horse and South Oxfordshire aim for 35% and 40% of larger developments to be affordable respectively, which is below the 50% assumed in the SHMA in connection with Oxford's needs. If sites outside of Oxford in other Oxfordshire Districts, which are intended to count towards Oxford's unmet needs, do not effectively contribute towards the need for affordable housing then this may create additional pressure for development elsewhere. It also may adversely affect the ability of important employers in Oxford, such as the health sector and the Universities, to recruit and retain staff.
- 3.35. Both South Oxfordshire and the Vale of White Horse are proposing to release sites from the Green Belt for housing development. The Growth Board work programme identified that the release of Green Belt sites is necessary to help meet Oxford City's unmet housing needs effectively. However it is not clear that South Oxfordshire's assessment of options has been robust and objective as the Grenoble Road option has been dismissed despite its positive assessment through the Growth Board work programme.
- 3.36. South Oxfordshire place significant reliance on new allocations in Neighbourhood Development Plans to help deliver future housing needs (at least 2,200 dwellings or 10% of the total expected supply). This does create a risk over the delivery of the necessary housing in their district, although South Oxfordshire state that they will favourably consider speculative planning applications for housing in Neighbourhood Development Plan areas if Neighbourhood Development Plans do not allocate the required level of housing.
- 3.37. Officers are in discussion with officers at Cherwell District Council and Oxford City Council about the implications of South Oxfordshire's Local Plan given the lack of consistency with the agreed Growth Board apportionment. It may be that a joint representation on these matters would be helpful.

3.38. The respective deadlines for responses to the consultations are 22 November (Vale) and 30 November (South). The consultations are part of formal stages of the plan processes and cannot be extended. In the case of the Vale consultation, the deadline will have passed before the call-in period following this meeting has finished; and in the case of South Oxfordshire, there would be insufficient time to organise a meeting of the Overview and Scrutiny Committee in the event of a call-in request, and for the Cabinet to consider the matter again if that call-in request was supported. Accordingly, to ensure that the Council's position in response to the consultations can be submitted, the recommendation at 2(d) above has been included, and the Chairman of the Economic and Social Overview and Scrutiny Committee has confirmed that he is supportive of that, in all the circumstances.

4. ALTERNATIVES/OPTIONS

Cabinet can choose whether it wishes to respond to the two Local Plan consultations for South Oxfordshire and Vale of White Horse, and could choose to amend the scope of the proposed response.

5. SUGGESTED OFFICER RESPONSE

5.1. Officer's recommend that the Council should respond to the two consultations with the following key points:

- Support for Vale of White Horse District Council's positive steps in taking forward the second part of its Local Plan in order to help address Oxford City's unmet housing need.
- Concern over South Oxfordshire's proposal to depart from the agreed Growth Board apportionment, which raises issues under the duty to cooperate, and which is already leading to pressure for additional housing in West Oxfordshire to make up the shortfall.
- The South Oxfordshire Local Plan itself shows that there is adequate housing capacity in the District to meet the full growth board apportionment – no technical reasons have been identified for why this can't be done.
- The importance of considering the relationship of sites with Oxford when considering how well they contribute to helping meet Oxford's unmet housing needs.
- It would be helpful to have additional clarity on which specific housing sites within the Vale of White Horse will contribute towards Oxford's needs, as this would allow effective monitoring of delivery, and enable affordable housing requirements to be considered through planning application processes.
- South Oxfordshire's approach to deliver housing that contributes towards Oxford's needs solely in accordance with its own spatial strategy is unsound as it takes no account of the relationship of sites with Oxford.
- There is a need for clarity on which specific housing sites within South Oxfordshire will contribute towards Oxford's needs, as this would allow effective monitoring of delivery, and enable affordable housing requirements to be considered through planning application processes.
- Concern on how Vale of White Horse and South Oxfordshire can effectively contribute to Oxford's unmet affordable housing need given the percentage of affordable housing that will be sought on sites in their Districts.
- The importance of infrastructure to support future growth and the need for infrastructure issues, such as transport, to be looked at across Local Authority boundaries.

6. FINANCIAL IMPLICATIONS

There are no direct financial implications from responding to these two consultations.

7. RISKS

There is a reputational risk to the Council if it does not respond constructively to the two consultations. There are also risks for the Council from how other parties might seek to use the South Oxfordshire proposal not to follow the Growth Board apportionment in order to undermine the Council's strategy for West Oxfordshire through the Local Plan Examination process. Otherwise there are no other direct risks in responding to the consultation.

8. REASONS

Providing comments on the South Oxfordshire and Vale of White Horse Local Plans can support the Council's ability to protect and enhance the environment of West Oxfordshire and maintain the district as a clean, beautiful place with low levels of crime and nuisance. It will also support the Council's ability to work in partnership to sustain economically prosperous towns and villages with full employment.

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Background Papers:

1. South Oxfordshire Local Plan 2011-2033 – Final Publication Version, South Oxfordshire District Council, October 2017 (<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/emerging-local-plan>)
2. Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites – Publication Version, Vale of White Horse District Council, October 2017 (<http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2>)
3. South Oxfordshire Local Plan 2033 Second Preferred Options, South Oxfordshire District Council, March 2017 (<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-second-preferred-options-consul>)
4. Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites - Preferred Options Consultation, Vale of White Horse District Council, March 2017 (<http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2>)
5. Oxfordshire Strategic Housing Market Assessment, GL Hearn, April 2014 (<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/ourworkwithcommunities/oxfordshirepartnership/spatialplanninginfrastructure/Final%20SHMA%20Report.pdf>)
6. Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area, Oxfordshire Growth Board, September 2016 (<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/communityandliving/partnerships/GrowthBoard/MemorandumofCooperation.pdf>)