

WEST OXFORDSHIRE DISTRICT COUNCIL

CABINET: WEDNESDAY 19 OCTOBER 2016

SUGGESTED CHANGES TO THE WEST OXFORDSHIRE LOCAL PLAN 2031

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)

I. PURPOSE

To consider what changes ought to be made to the submission draft West Oxfordshire Local Plan in order to address the preliminary findings of the Inspector.

2. RECOMMENDATIONS

- (a) That the Council be recommended to approve the suggested modifications to the submission draft Local Plan, as shown in the track changes to the Local Plan attached at Appendix 1, for the purposes of the Local Plan Examination and statutory consultation for a period of 6 weeks on the main modifications;
- (b) That the Council be recommended to agree that the updated 5 year housing land supply position statement attached at Appendix 2 is published and utilised for the purposes of the Local Plan and development management; and
- (c) That the Council be recommended to authorise the Head of Planning and Strategic Housing to make any minor factual/typographical amendments to the suggested Local Plan modifications or to the housing land supply position statement, in liaison with the relevant Cabinet Member, prior to formal publication.

3. BACKGROUND

West Oxfordshire Local Plan

- 3.1. The West Oxfordshire Local Plan 2031 was formally published in March 2015 and submitted for independent examination in July 2015. The Local Plan sets out a framework for managing the development of the District up to 2031, and will replace the current West Oxfordshire Local Plan 2011.
- 3.2. The current Local Plan was adopted in 2006 and had an end date of 2011. Although most of the policies have been formally saved and are still used for development management purposes, the housing land supply policies are now out of date and there is a clear need to adopt a new Local Plan as soon as possible to ensure that sustainable development is achieved within the District and to minimise the risk of speculative applications in poor locations.
- 3.3. The progress of the new Local Plan has been delayed for a number of reasons. A key issue has been the proposed housing requirement which was originally based on the South East Regional Plan (365 homes per year). In 2014 a new Strategic Housing Market Assessment (SHMA) for Oxfordshire was published and this suggested that the housing need in West

Oxfordshire had increased to 660 homes per year in the period 2011 – 2031 (13,200 homes in total).

- 3.4. Based on the Council's own independent evidence (published after the SHMA) the final draft Local Plan was submitted on the basis of a housing requirement of 525 homes per year in the period 2011 – 2031 (10,500 in total) some 2,700 less than the figure identified in the SHMA.
- 3.5. The Council's primary justification for this lower figure was that the household projections used as the starting point for assessing housing need in the SHMA are trend based and were affected by high levels of house building that occurred in the District from 2005 – 2008. The Council also raised some concerns about other elements of the SHMA including the approach taken towards the alignment of new homes and jobs.
- 3.6. Another key issue addressed in the submission draft Local Plan was that of Oxford City's unmet housing need. The National Planning Policy Framework (NPPF) requires local planning authorities to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated. The NPPF also outlines that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. Through the work of the Oxfordshire Growth Board it was identified that Oxford City is unable to meet all of its own housing needs as a consequence of its tight administrative boundary and the limited growth options within them. A 'working assumption' of 15,000 homes was subsequently agreed in October 2015 to define the scale of this unmet housing need.
- 3.7. The submission draft Local Plan proposed to address the Oxford unmet housing need issue through an early review of the new Local Plan. This was intended to take forward the conclusions of the Oxfordshire Growth Board work programme to apportion the unmet housing need between the various Council areas when they became known. This proposed review process was similar to the approach that had been taken by Cherwell District Council in their recently adopted Local Plan and the approach taken by the Vale of White Horse District Council in their Local Plan.

The Local Plan Inspector's Preliminary Findings

- 3.8. The first examination hearing sessions dealing with strategic matters including housing and employment were held in November 2015 and the preliminary findings of the Inspector were published in December 2015.
- 3.9. In his preliminary findings the Inspector concluded that the Council had fulfilled the duty to co-operate. However, his findings also set out a number of significant concerns with the submitted plan including the proposed housing requirement and the need to take account of 'unmet' housing need arising from Oxford City.
- 3.10. The Inspector concluded that in choosing to prepare its own housing evidence and not fully engaging with the other Oxfordshire authorities, the Council had failed to accord with the requirements of the NPPF. In particular, the Council had failed to provide evidence that it had explored with its partners the potential implications of its approach for plan making in Oxfordshire.
- 3.11. The Inspector was critical of the Local Plan evidence base and suggested that the Council had drawn selectively on various studies, none of which present a single coherent, evidential narrative, in contrast to the SHMA. In his commentary he focused on three main issues; the demographic starting point (i.e. future household projections) economic growth and affordable housing.

- 3.12. The Inspector did not accept the Council's arguments about the past 'over-supply' of housing but did accept that the demographic starting point used in the SHMA (541 dwellings per year) has been superseded by more recent DCLG household projections (483 dwellings per year) as well as the Council's own 10-year migration trend analysis (491 dwellings per year). He concluded that a new demographic starting point for West Oxfordshire is around 490 dwellings per year. However, he questioned whether this lower starting point would affect the overall SHMA recommendation and also highlighted that it may include some suppression of household formation in the 25 – 34 age group.
- 3.13. Whilst recognising the volatility of economic forecasts, the Inspector saw no reason to depart from the 'committed economic growth' scenario set out in the SHMA and rejected the Council's reliance on the lower, baseline scenario. In essence, he considered that the Council should be aiming for a more ambitious level of job growth in line with the LEP and other authorities and providing enough new homes to support it.
- 3.14. The Inspector endorsed the SHMA figure of 274 affordable homes per year in West Oxfordshire. He stated that the Council should be actively considering how to maximise the delivery of affordable housing and suggested that the issue is considered afresh.
- 3.15. The Inspector's conclusions on the West Oxfordshire housing target effectively gave the Council the choice to either adopt the SHMA figure of 660 dwellings per year, or to carry out further technical analysis taking account of more recent information on population and household projections in liaison with neighbouring Councils.
- 3.16. In terms of the approach to be adopted in the Local Plan on helping to meet Oxford City's unmet housing need the Inspector made it clear that he would not support this issue being deferred to an early plan review. His rationale for this was that suspension of the examination to allow for further work on the Council's own housing requirement would provide the opportunity to address the unmet housing need from Oxford City. He concluded that not addressing it at this stage could render the new Local Plan out of date before it can be adopted and would also not be conducive to planning for sustainable development.
- 3.17. The Inspector also indicated that in his initial view any apportioned figure for Oxford City's unmet housing need will carry significant weight and would immediately form part of West Oxfordshire's need and thus need to be taken into account in calculating the 5-year housing land supply. This initial view is not consistent with the assumptions made by each of the Oxfordshire local authorities through the Oxfordshire Growth Board work, which has identified significant lead in times for strategic sites required to meet Oxford's needs and assumes that these are likely to come forward after 2021.
- 3.18. In light of the issues raised in his preliminary findings the Council wrote to the Planning Inspector in January 2016 asking him to formally suspend the Local Plan examination to allow for consultation on proposed changes to the plan (known as 'main modifications') later in the year.
- 3.19. The Inspector agreed to suspend the Local Plan examination until December 2016. This timescale was chosen as it would fit with the Oxfordshire Growth Board work programme and the expected date when the conclusions of the Growth Board on how to apportion Oxford City's unmet housing need would become available. It would also allow time for the Council to carry out further technical analysis on its housing target, and to identify any additional housing sites required as a consequence.

Oxfordshire Strategic Housing Market Assessment

- 3.20. In response to the Inspector's suggestion that the Council may wish to undertake some further analysis of future housing requirements taking account of more recent information on population and household projections the Council appointed Peter Brett Associates (PBA) to undertake a partial update of the Oxfordshire SHMA (2014) focused on West Oxfordshire. An initial draft copy of the report was shared with the other Oxfordshire authorities before being published more widely for informal consultation with stakeholders in July/August 2016.
- 3.21. In their report Peter Brett Associates conclude that West Oxfordshire's objectively assessed need (OAN) for the plan period 2011-31 is 568 dwellings per annum. This is a job-led number, providing enough workers to match the Committed Economic Growth scenario put forward in the SHMA. The reason for the difference from the equivalent figure in the SHMA (661 dwellings per annum) is that Peter Brett's analysis necessarily uses a different job-led model and has also updated the age profile of the district's population, using information that post-dates the SHMA.
- 3.22. This OAN figure does not include any cross-boundary unmet need from Oxford City. It also does not include any assessment of affordable housing need.
- 3.23. Peter Brett Associates estimate that the total annual affordable housing need in West Oxfordshire is 204 households per year taking account of committed affordable housing supply. Excluding existing commitments, the total net need for affordable housing is calculated to be 275 per annum, which is very similar to the directly equivalent figure of 274 per annum contained in the original SHMA (2014) when considered on an annual basis.
- 3.24. Peter Brett Associates state that in light of the affordable housing need analysis in their report and the original SHMA, the Council should consider an appropriate uplift from the 568 dwellings per annum OAN figure that they have identified in order to address affordable housing need. They do not however quantify the extent of the uplift needed stating that it is a policy judgement to be made by the authority and is independent of the OAN.
- 3.25. In terms of responses from the other Oxfordshire authorities, only Oxfordshire County Council provided detailed critical technical comments on the SHMA update report and those were addressed in the final report. When published for wider stakeholder input in July/August 28 responses were received, 17 of which were from the development industry.
- 3.26. The comments from the development industry made the following key points:
- WODC is continuing to work in isolation from the other Oxfordshire authorities;
 - Applying a different methodology for West Oxfordshire alone is not appropriate;
 - Lack of transparency in the PBA report e.g. their job-led model assumptions and lack of consistency with the original SHMA;
 - Failure of PBA to test a return to more positive household formation rates;
 - Failure of PBA to test scenarios with and without unattributable population change (UPC) in line with the Inspector's recommendations; and
 - Market signals suggest a worsening of affordability and an appropriate response is needed.

- 3.27. The comments from the other stakeholders are very different. While some feel that a figure of 568 dwellings per annum may be appropriate as West Oxfordshire's OAN others consider that this figure is still too high as it still relies upon the SHMA which they consider to be flawed.
- 3.28. Peter Brett Associates are currently preparing a technical response to the comments made. This will be made available as part of the statutory consultation on the suggested changes to the Local Plan.

Strategic Housing and Economic Land Availability Assessment

- 3.29. To help the Council consider which additional housing sites could be available to help meet a revised housing target a call for potential development sites was made in January/February 2016. A large number of sites were submitted before or shortly after this date. This is currently informing the preparation of a new Strategic Housing and Economic Land Availability Assessment (SHELAA).
- 3.30. The SHELAA will consider the development potential of a range of different sites across the District for both housing and economic development. This will include sites that are already known to the Council, additional sites that have been submitted to the Council through the call for sites, and sites identified by the Council itself. Input has been sought from Parish Councils and other key stakeholders including Oxfordshire County Council as the highway and education authority. The emerging findings from the SHELAA assessment process have guided the officer recommendations in this report. The SHELAA will be finalised following the consideration of the Local Plan at the Cabinet and Council meetings and made available as part of the statutory consultation on the suggested changes to the Local Plan.

Oxfordshire Growth Board

- 3.31. 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 to evaluate the 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	4400
Oxford City Council	550
South Oxfordshire DC	4950
Vale of White Horse DC	2200
West Oxfordshire DC	2750

- 3.32. The figure of 2,750 dwellings apportioned to West Oxfordshire is based upon a positive technical evaluation of strategic options for a new settlement to the north of the A40 near Eynsham (2,200 dwellings) and an urban extension to the west of Eynsham (550 dwellings). Other options in West Oxfordshire at Witney, Carterton and Barnard Gate scored poorly through the evaluation process.
- 3.33. South Oxfordshire District Council does not agree with this apportionment. Therefore the Memorandum of Cooperation that sets out the apportionment will be signed by the

other five Councils, but not by South Oxfordshire. Officers are confident that the Growth Board process satisfies the Duty to Co-operate, and that the other signatories to the Memorandum of Cooperation, including Oxford City, will support this position through our Local Plan process.

- 3.34. The apportionment is based upon a common assumed start date of 2021 for the commencement of development after the adoption of the respective Local Plan reviews or Local Plan updates/refresh. This assumption does not preclude earlier delivery, but does recognise the complexity of the issues being considered and has sought to factor in reasonable lead times to enable options to come forward and to be fully considered through the Local Plan process.
- 3.35. Each local planning authority will remain responsible for the allocation of housing sites within its own district and through its own Local Plan process. This allows local planning authorities to adopt alternative locations in their area for meeting the apportioned need if their evidence base justifies this. In West Oxfordshire, the alternative locations considered did not perform well in the technical evaluation, and therefore are not considered to be viable alternatives.

Garden Village

- 3.36. In July the Council submitted an expression of interest to Government to create a locally-led Garden Village in an area just off the A40 and to the north of Eynsham. The Garden Village would be its own distinct settlement with its own facilities including transport links, science/business park, schools and community resources. It could play a key role in helping to meet Oxford City's unmet housing need.
- 3.37. The garden village concept is at an early stage. If the garden village is included as a strategic proposal as part of the Local Plan, then third parties will have an opportunity to make formal representations on this suggested change during the 6-week consultation period. Officers expect that the Government will make an announcement in the autumn on whether they will support West Oxfordshire's garden village concept through their garden village programme. If Government financial support is made available then the delivery of this new strategic development area could be accelerated. If the expression of interest is not successful, then it is still recommended that the Council work with partners to deliver a garden village in this location, but its delivery may be slower.

Other Technical Work

- 3.38. Oxfordshire County Council commissioned the Chipping Norton Transport Options Study from White Young Green to help inform the Local Plan. This study evaluates the impact of a number of potential residential development scenarios focussed on Chipping Norton, and explores potential transport schemes to mitigate these impacts. The study concludes that the highways impact of development to the east of Chipping Norton on the town centre can be reduced if the scale of development is increased to a sufficient scale to deliver a new distributor road to the east of the town, which it is estimated will result in a 40% reduction in HGV traffic through the town centre.
- 3.39. To support the Local Plan a number of other technical studies are underway to update the evidence base. These include:
- Updated Travelling Communities Accommodation Needs Assessment; and
 - Level I Strategic Flood Risk Assessment (SFRA) Update; and
 - Water Cycle Study Phase I Scoping Report; and

- Renewable and Low Carbon Energy Assessment and Strategy; and
 - Infrastructure Delivery Plan update; and
 - Updated Sustainability Appraisal; and
 - Updated Habitat Regulations Assessment (HRA) Report; and
 - Transport modelling; and
 - Local Plan/CIL Viability update.
- 3.40. The emerging findings from these studies have been considered in preparing the officer recommendations set out in this report. The studies will be finalised following the consideration of the suggested changes to the Local Plan at Cabinet and Council in October. The intention is to publish the relevant documents during the consultation period on the suggested Local Plan changes.
- 3.41. The Council is also working with the other Councils in Oxfordshire, as part of the Growth Board programme of work, to carry out a joint Habitat Regulations Assessment Screening exercise.

Local Plan Timescales

- 3.42. The anticipated timescale for taking the Local Plan through to adoption is now as follows:
- Cabinet/Council meetings to agree proposed modifications and the main modifications consultation: October 2016
 - Consultation on proposed main modifications (6 weeks): November 2016
 - Review of consultation responses: December 2016
 - Submission of modifications to Inspector: January 2016
 - Examination hearings: February/March 2017
 - Inspector's Report: June/July 2017
 - Adoption of the Local Plan: September/October 2017
- 3.43. These timescales would depend upon there being no significant changes to the suggested modifications at Cabinet/Council in October, and the Inspector not having any further fundamental concerns with the Local Plan.

4. ALTERNATIVES/OPTIONS

- 4.1. Effectively the Inspector, through his preliminary findings, has given the Council the choice to either formally withdraw the submitted Local Plan or to put forward suggested changes to the plan in order to make it sound.
- 4.2. The recommendation from officers is that the Council should propose changes to the Local Plan rather than withdrawing it. There are a number of disadvantages of withdrawing the plan including the risk of Government intervention and a longer period of exposure to 'planning by appeal'. In any case a new plan would still have to address West Oxfordshire's increased housing need and the apportionment to help meet Oxford City's unmet housing need.

5. RECOMMENDED CHANGES TO THE LOCAL PLAN

- 5.1. This report recommends a package of suggested main modifications to the Local Plan relating to issues of soundness as well as a number of more minor additional modifications (typographical and factual corrections, improved clarity, etc.). The proposed main modifications address the following key issues that arise from the Local Plan Inspector's preliminary findings:
- What housing target should be set to meet West Oxfordshire's housing needs;
 - How to provide for the Growth Board apportionment to West Oxfordshire of 2,750 additional dwellings to help meet Oxford City's unmet housing need;
 - Does the strategy and settlement hierarchy in the Local Plan need to be adapted as a consequence of a higher housing target;
 - 5 Year Housing Land Supply and whether to use the Liverpool or Sedgfield approach in its calculation; and
 - Which additional housing sites should be identified?
- 5.2. For ease of reference, the suggested changes to the Local Plan are shown as 'tracked changes' in an amended version of the Local Plan which is attached at Appendix I. The changes will also be set out in two schedules in the Council agenda, which will list the proposed main modifications in plan order along with the more minor additional changes, again in plan order.

West Oxfordshire Housing Target

- 5.3. In light of the assessment work carried out by Peter Brett Associates, the responses made to their report, and the need to support the delivery of affordable housing, officers recommend that a housing target of 660 dwellings per year should be adopted in the Local Plan. The rationale for this approach is that although the Peter Brett Associates report identifies a much lower job-led housing requirement, they advise that the level of identified affordable housing need is very similar to that identified by the original SHMA. Utilising the original SHMA figure for West Oxfordshire also ensures consistency of approach across the Oxfordshire Housing Market Area.
- 5.4. A housing target of 660 dwellings per year can be seen as a generous target given that the Inspector himself accepted that a lower demographic starting point may be appropriate. It represents a significant uplift from the target in the submission draft of the Local Plan (525 dwellings per year) and is substantially higher than long term historic housing delivery rates in West Oxfordshire of circa 480 dwellings per year. It responds to the call in the NPFF for a significant boost in the supply of housing. The development sector will need to boost its capacity, and accelerate its delivery of planned sites, if this target is to be met over the plan period.

Oxford Unmet Housing Need

- 5.5. As mentioned before, the Growth Board apportionment of 2,750 dwellings to West Oxfordshire is based upon a positive technical evaluation of strategic options for a new settlement to the north of the A40 near Eynsham (2,200 dwellings) and an urban extension to the west of Eynsham (550 dwellings). The area assessed to the north of the A40 is the same location covered in the Garden Village expression of interest. Whilst there are other alternative strategic options in West Oxfordshire at Witney, Carterton and Barnard Gate for helping to meet Oxford City's unmet housing need these options

did not score well through the technical evaluation process. In part, this is because these alternative options are further from Oxford, and therefore less suitable for meeting Oxford City's unmet housing need in terms of their spatial and functional relationship with the City.

- 5.6. Officers recommend that the Local Plan should identify the Garden Village location, north of the A40 near Eynsham, and the West Eynsham area, as the areas within West Oxfordshire that should contribute towards meeting Oxford City's unmet housing need. There would be significant lead in times for the development of both of these areas. It is suggested that the Local Plan should plan for the District's contribution to Oxford City's unmet housing need to be delivered in the 10-year period 2021 to 2031 in line with the Growth Board's conclusions. If the Garden Village expression of interest is supported by Government then delivery on this site could be accelerated.

Local Plan Strategy

- 5.7. The submission draft of the West Oxfordshire Local Plan 2031 contained core objectives to help guide the development of the District. Core objectives CO1, CO2 and CO4 place significant emphasis on locating development in appropriate locations where it can meet local needs and reduce the need to travel. These core objectives are taken forward into a defined settlement hierarchy and a development strategy set by Policy OS2 – Locating Development in the Right Places.
- 5.8. It is recommended that the essence of this strategy and the settlement hierarchy which is focused on delivering the majority of future growth in the District's main towns and larger villages is retained. The alternative would be a more dispersed pattern of development leading to significant harm to the character of the District and making it difficult to deliver the necessary infrastructure. However, some adjustment is required to the strategy, and the settlement hierarchy, as a consequence of making provision for helping to meet Oxford City's unmet housing need in the Eynsham area.
- 5.9. It is recommended that the proposed Garden Village should be identified as a future rural service centre. The Garden Village would then replace Long Hanborough which would no longer be a defined rural service centre. This reflects the significant scale of development proposed in the Garden Village, the key role it will play as a transport and business hub, and the relatively limited scope for further development in Long Hanborough. It also avoids an over concentration of rural service centres in this part of the District.

5 Year Housing Land Supply

- 5.10. An updated 5-year housing land supply position statement is attached at Appendix 2. This sets out the current position taking into account the recommendations in this report for changes to the Local Plan as well as past completions and existing commitments. It is recommended that this updated position statement is used for development management purposes. The Local Plan Inspector will also look closely at whether the Local Plan includes a deliverable 5 year housing land supply.
- 5.11. In calculating a 5 year housing land supply a key consideration is how to address any past backlog in housing delivery. There are two different methods for calculating how to address any backlog in the delivery of housing in a 5 Year Housing Land Supply. The Sedgfield method of calculating land supply involves adding any shortfall of housing in the local plan from previous years over the next five years of the plan period, whereas the Liverpool (or 'residual') method spreads the shortfall over the whole remaining plan period.

- 5.12. National Planning Guidance states that “Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the ‘Duty to Cooperate’.”
- 5.13. A housing target of 660 dwellings per year will require a 5 year housing land supply of 5,393 dwellings in the period 1st April 2016 – 31st March 2021 including a 5% buffer and using the Sedgefield method. If the Liverpool method is used then a 5 year housing land supply of 4,108 dwellings would be required, again with a 5% buffer. The projected 5 year housing land supply based on the recommendations in this report is 4,514 dwellings which is sufficient to meet the 5-year requirement using the Liverpool (residual) approach but not using the alternative Sedgefield methodology.
- 5.14. In order to be included in the assumed 5 year housing land supply housing sites need to be realistically deliverable over the next 5 years. Using the Sedgefield methodology, more than 1,000 homes per year would need to be built consistently over the five year period to 2021. This level of growth has never been achieved in West Oxfordshire and is highly unlikely to be achieved. The addition of further large Strategic Development Areas would not boost this short term supply by much given the long lead in times on such sites. Conversely a huge number of smaller sites would need to be brought forward to achieve the necessary uplift and the additional capacity needed has not been identified in the emerging SHELAA. Officers will carry out further technical work to evaluate the implications of a Sedgefield approach, but at present it does not appear that this could be achieved without fundamentally changing the Local Plan strategy, and including unacceptable sites in sensitive areas. Officers will engage with neighbouring authorities to assess whether they are able to address any shortfall, but this appears unlikely in light of their own significant housing requirements and apportioned need from Oxford City.
- 5.15. Therefore officers are of the opinion that a reasonable approach is to base the calculation of 5-year housing land supply on the Liverpool method.

Additional Housing Sites

- 5.16. The recommended increase in the West Oxfordshire housing target from 525 dwellings per annum to 660 dwellings per annum means that additional housing sites need to be identified in the Local Plan.
- 5.17. To help meet the increased West Oxfordshire housing requirement the following package of additional housing sites is recommended:
- Increased capacity at REEMA North and Central, Carterton (200 homes (net) to 300 homes);
 - New allocations at Carterton (Swinbrook Rd and Milestone Road, 266 homes);
 - Increased development area at Tank Farm, Chipping Norton (600 homes to 1,400 homes);
 - Part of a new allocation at West Eynsham (450 homes);
 - Increased development area at North Witney (1,000 homes to 1,400 homes);
 - Increased capacity at East Witney (400 homes to 450 homes);
 - New allocations at Woodstock (670 dwellings); and

- New allocations at Burford (85 homes), Charlbury (40 homes), Long Hanborough (75 homes), Minster Lovell (85 homes), Shipton under Wychwood (44 homes), Stanton Harcourt (50 homes), Stonesfield (50 homes), and Witney (50 homes).
- 5.18. Members will note that the indicative capacities of the four sites that are already included in the draft Local Plan (REEMA, East Witney, North Witney and East Chipping Norton - Tank Farm) have all been increased to help meet the increased overall housing requirement. At the Local Plan examination officers indicated that if the requirement were to increase, this would be a logical first step before considering the need for new site allocations.
- 5.19. The increased quantum of development at North Witney is a result of the inclusion of an additional parcel of land to the west of Hailey Road, a modest increase in the extent of the developable area to the north, and slightly higher density assumptions on the main part of the site. It is considered that around 1,400 homes can be delivered on the site whilst ensuring an acceptable degree of impact in landscape terms. The increase in dwelling numbers also assists with viability by bolstering the overall gross development value of the scheme whilst retaining a broadly similar package of supporting infrastructure.
- 5.20. The increase in the size of the Tank Farm, Chipping Norton allocation is a result of the inclusion of additional land to the north of London Road (previously not part of the site boundary) as well as a modest increase in the extent of the existing site boundary to the east. The inclusion of the land north of London Road provides the opportunity to deliver a significant quantum of new business floorspace (approximately 9 hectares) in a single, highly sustainable location with potential for further expansion in the longer term. The increase in the extent of the site as a whole will enable the provision of an alternative strategic transport link for the town, as well as helping to ensure the viability of a new primary school, both of which can be delivered as integral parts of the allocation. It is considered that this quantum of development can be successfully accommodated on the site without undue harm in terms of landscape impact subject to appropriate mitigation.
- 5.21. The strategy for Carterton focuses on delivering the existing strategic commitments for housing in the town, which include the development of 700 homes to the east of Carterton, additional housing on the REEMA sites in the central area of Carterton and the development of a further 250 homes to the north west of the town at Swinbrook Road. The opportunity has also been taken to add additional allocations at Swinbrook Road and Milestone Road within the existing framework of the town. Areas of further MOD housing in addition to the REEMA sites have also been identified as having the potential for redevelopment over the plan period although have not been included in the housing supply assumptions. At this point in time officers are not proposing an additional strategic development area to extend Carterton further into the countryside, but this issue will need to be considered again as part of any future Local Plan review.
- 5.22. There are a number of sustainable development opportunities on the edge of Woodstock. Three sites have been identified, which together can deliver 670 dwellings, without harm to the historic character of the town or the setting of the Blenheim World Heritage site. It is anticipated that as these sites are in the same land ownership they are likely to come forward in a sequential manner thereby helping to ensure a gradual level of growth.

- 5.23. To contribute towards meeting Oxford City’s unmet housing need the following additional housing proposals are recommended:
- A Garden Village on land north of the A40 north of Eynsham (2,200 homes)
 - Part of a new allocation at West Eynsham (550 homes)
- 5.24. These proposals reflect the positive technical evaluation of the strategic options in these two locations through the Growth Board apportionment process. The developments would have strong spatial and functional relationships with Oxford City, and would help bring forward significant infrastructure improvements.

The recommended housing supply is shown in the following table:

Source	Number of Homes
Completions 2011-2016	1,464
Large existing commitments	4,107
Small existing commitments	644
Future anticipated windfall 2016-2031	1,380
Strategic Development Areas	6,450 (including 2,750 for Oxford’s unmet housing need)
Non-Strategic Site Allocations	1,719
Total	15,764
Anticipated 5-year housing land supply	4,514

- 5.25. The Council could choose to develop a different package of housing sites to meet the housing target. However, any significant changes, such as the inclusion of another Strategic Development Area, could necessitate further technical work, on issues such as sustainability appraisal, transport modelling and viability, before the suggested Local Plan main modifications could be published for consultation. This could lead to additional delays to the Local Plan and is therefore not recommended.

Other Suggested Changes

- 5.26. A number of other additional modifications to the Local Plan, which are minor in nature, are suggested. These changes update the plan text, clarify the role of the Council in enabling development, and identify critical infrastructure requirements.

Conclusion

- 5.27. The NPPF states that the planning system should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.
- 5.28. The West Oxfordshire Local Plan has a vital role to play in helping to manage future development in this area of high housing pressure. The Local Plan Inspector in his preliminary findings has raised a number of important issues. The Council needs to respond with a package of suggested changes and technical studies that address these issues.
- 5.29. This report recommends that the Council adopts a housing target of 660 dwellings per year in order to meet West Oxfordshire’s own housing needs, and that it should plan for an additional 2,750 dwellings between 2021 and 2031 in order to help meet Oxford City’s

unmet housing needs. A package of additional housing sites are suggested which can meet these needs without significant change to the intrinsic character of the District. This package includes new sites at Eynsham which can help meet Oxford City's unmet housing need, as well as increases in the capacity and/or development areas on the already identified strategic development areas in Carterton, Chipping Norton and Witney. The package of housing sites also includes a range of small and medium sized sites in sustainable locations across the District, and this is important to strengthen the 5 year housing land supply. The critical infrastructure requirements have been identified to support these increases in capacity and new sites. This new infrastructure will have wider benefits for existing communities.

6. FINANCIAL IMPLICATIONS

- 6.1. There are cost implications associated with the publication of the suggested Local Plan modifications for consultation, the next phase of the Local Plan Examination and for the remaining stages of the Local Plan process.
- 6.2. The changes to the Local Plan suggest that an Area Action Plan should be prepared in order to bring forward the Garden Village. If the Garden Village expression of interest is supported by Government then Government funding may be available to cover all or part of the costs involved.

7. RISKS

- 7.1. There is a risk that the Local Plan Inspector will not accept the Council's suggested modifications or will find the Local Plan unsound. There is also a risk that third parties will challenge elements of the Local Plan either through the Local Plan Examination or subsequently through a legal challenge. The current lack of an up to date adopted Local Plan has put the Council at a greater risk of speculative planning applications being approved on appeal against the Council's wishes, and this is evidenced by recent appeal decisions. The longer the period before an adopted Local Plan is in place the longer the period of uncertainty for development management decision making and for the communities served by the Council.

8. REASONS

- 8.1. The Local Plan is a key mechanism to enable the Council to manage the future growth of the District. It enables the Council 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. West Oxfordshire Local Plan 2031, Submission Draft, West Oxfordshire District Council, March 2015
2. West Oxfordshire Local Plan Examination - Inspector's Preliminary Findings – Parts I and II, December 2015
3. Oxfordshire Strategic Housing Market Assessment Partial Update, Peter Brett Associates, July 2016
4. Draft Memorandum of Co-operation between the local authorities in the Oxfordshire Housing Market Area - Meeting the Objectively Assessed Need for Housing in Oxfordshire, Oxfordshire Growth Board, September 2016
5. Chipping Norton Transport Options Study, WYG Transport Planning, July 2016