

The Rt. Hon. Robert Jenrick, M.P.
Secretary of State for Housing,
Communities & Local Government
Ministry of Housing, Communities
& Local Government
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Councillor Debby Hallett
Deputy Leader of the Council

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Dear Mr Jenrick,

I am writing on behalf of Vale of White Horse District Council regarding our Local Plan Part 2 (LPP2) and Oxford's unmet housing need. It is our opinion that for the LPP2 to be sound, the exact, evidenced number of houses that Oxford requires to meet its real need should be determined prior to its adoption. Therefore, while the Council recognises that at this stage in the plan making process our choices are limited, we are considering our options in relation to LPP2.

On 25 June 2019, the Vale received the Planning Inspector's final report on LPP2. Although the Inspector concluded that the plan was sound, as one of the key objectives of LPP2 is to set out policies and locations to meet the unmet need of Oxford City, we would contend that it could not be comprehensively examined in the absence of this information. The Council's view is, therefore, that the outstanding issues with Oxford City's Local Plan need to be resolved before we can decide on adopting LPP2.

The interconnectivity between the Local Plans being developed within Oxfordshire should have been considered in the examination process. We would argue that the current procedures are deficient as they do not take account of this fact. As one of the five local planning authorities in Oxfordshire, Vale of White Horse considers that the Examination process of Local Plans which are helping to deliver the unmet housing need of a neighbouring authority should be sequential. Moreover, where this is not the case, then clear guidance should be in place which allows for the straightforward amendment of previously examined Plans to reflect any changes in circumstances.

Further, while the Vale, as part of our Duty to Cooperate, have agreed in principle to assisting Oxford in meeting their unmet housing need, the City Council have so far failed to provide a clear and evidenced housing target. We believe that the Duty to Cooperate should run both ways, and that, therefore, Oxford should be obligated to

produce an accurate assessment of their housing need before asking their neighbours for assistance.

Our LPP2 allocations will result in the removal of Green Belt land within the Vale to help meet Oxford City's unmet housing need – site allocations that the Planning Inspector cautioned against in his final report. When this note of caution is considered in conjunction with the lack of an exact housing need figure for Oxford, it leaves the exceptional circumstances for releasing Green Belt land at Dalton Barracks and Shippon open to potential challenge.

As a result of these issues, and the potential impacts that they will have, we would, therefore, like clarification on how we should 'confirm or adjust' an adopted LPP2 once Oxford's unmet need is established.

In addition, the Council requests an explanation by inviting you to revisit the Inspector's report conclusion as to how LPP2 can be considered sound and legal when:

- the housing figures used are based solely on a "working assumption" of Oxford's unmet need,
- it allocates housing development in the Green Belt in clear contravention of the National Planning Policy Framework, and
- it removes Dalton Barracks and Shippon from the Green Belt without the exceptional circumstances that the regulations require.

Yours Sincerely



Councillor Debby Hallett
Deputy Leader, Vale of White Horse District Council