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Vale of White Horse Local Plan 2031 - Part 1 - Examination

RESPONSE ON MATTER 11: Five Year Supply of Housing Land

11.1 Can a five year supply of deliverable housing land (in accordance with NPPF para 47) be currently identified against the plan's stated housing requirement?

11.2 Is it realistic that a five year supply of deliverable housing land would be maintained throughout the plan period?

The answer to both questions is 'certainly no'.

The crucial word here is 'deliverable', applying equally to both cases.

The main reason for the impossibility of supplying **deliverable** housing land is the unreliability of the economic modelling underlying the SHMA figures, expressed well by Alan Wenban-Smith in the paper deposited with the CPRE's statements sent to the Inspector in response to the Stage 1 Questions. Unlike the aspirational and wholly unrealistic figures and arguments provided by Cambridge Econometrics for the SHMA calculations, Alan Wenban-Smith showed that, under any reasonable economic prediction of the circumstances that could come about over the planning period, the extreme targets proposed are certain to result in failure of the Local Plan and hence the Plan must be unsound. The Plan is in no way in line with the requirements of NPPF paragraph 173 - to quote from that paragraph: *'....the sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened....'*

In this regard, one can note that only in exceptional years has the Vale been able to produce as many as 800 houses, whereas the Local Plan would need in the region of twice as many to meet the grossly exaggerated and unrealistic SHMA-driven figures. That an adequate number of jobs would be available to fuel the housing demand is also entirely unrealistic. The strategy would need 1,500 new jobs to be provided on average in each year until 2031. But less than 1,000 (rather than 4,500) were provided in the three years 2011-14.

Further, many of the proposed sites are on land which will be expensive to develop, which much decreases the likelihood of delivering the required housing in the given time frame. A careful reading of the District Council's Local Plan Appendices shows the likely need for mitigation in respect of **flooding** in very many cases and the likely need for special provision and substantial contributions to provide the necessary **infrastructure**, in particular in respect of **highways**. If this had been properly quantified in respect of each site, we could better evaluate how big an obstacle this might become.

The CIL and special grants, especially in respect of the innovation improvements in the Harwell/Milton/Chilton area, will clearly only go some way to meeting the actual cost. The Vale's resources will not meet the costs, and developers will not deliver the houses if high infrastructure costs are demanded from them. In respect of Highways, the Oxfordshire Local Transport Plan 4, on which Core Policy 17 is built, does not go nearly far enough in meeting the need. A sufficient supply of affordable housing will be an early casualty. Together there will not be sufficient resources for the identified sites to deliver the houses with the infrastructure demanded in the NPPF.

In this regard, one can consider the difficulties experienced in 'commissioning' the Grove Airfield site which was identified as the site that could solve, in the last planning period, the 5-year housing land supply difficulty endemic in the Vale. The Airfield has very few of the problems associated with a number of the sites identified in the Plan's Appendices. Yet the cost of providing the associated infrastructure has been a major consideration for the developers in not delivering houses at the Airfield. Similar problems seem now to be occurring at the strategic site at Crab Hill, also in the Wantage area, which has already been sold. Developers are clearly afraid to develop properties where demand for so many houses in a small area is unclear. Slow and steady, rather than blitz tactics as proposed in the Local Plan, carefully monitored with well-planned contingencies, would seem to be advisable. However, we do not see anything which would commit the Vale to observing the requirements of the NPPF on these topics in the Local Plan.

Further, the fact that a number of the sites listed in the Appendices are in the Green belt or AONB is likely to provide, if the Plan were to be found sound, further problems for the developers, insofar as the scrutiny given by the Council and the public is likely to be severe and the conditions for any approval are likely to be relatively stringent and costly.

Even the recent increase in approvals of applications to build houses by the District Council, due largely to the Council's failure to meet its 5-year target, has not resulted in the target being met. The increase is due, so it would seem, to either an Inspector, on appeal, approving an otherwise inappropriate site solely because the 5-year target has not been met, or the Vale's having not refused an application because it has taken the view that an Inspector would most likely act in this way, or the fact that, having once included an inappropriate site in its Draft Local Plan, the District Council approves an inappropriate development ahead of approval of the Local Plan in order to be consistent with its Draft. This strongly suggests that it is important, in a District of which a great part is either Green Belt or AONB or flood-plain, to take environmental constraints into account to reduce the projected

housing figures at the Draft Local Plan stage, and not just take the full SHMA figures unexamined.

Thus, the acceptance of the unrealistic high housing figures can only result in free rein being given to developers and development on inappropriate sites, running in parallel with further lack of success in delivering a 5-year supply.

Much of the above argument applies equally well to Matter 13 where we shall return to it.

END