

Vale of White Horse Draft Local Plan 2031 (“the Plan”)

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Matter 11 Five year supply of housing land

Can a 5 year supply of deliverable housing land (in accordance with NPPF para47) be currently identified against the plan’s stated housing requirement?

- 11.01 Under the current policies in the Plan the question of the ‘deliverability’ of housing depends very largely on the willingness of the volume builders to build out the strategic sites. This in turn depends on the viability of these developments, the suitability of the infrastructure and how these factors interrelate.
- 11.02 Following from the recent Ministerial Written Statement¹ serving as a reminder that developments have to pay the full costs of necessary infrastructure² there might be some sites that will become unviable and will not contribute to the supply of housing until the value is adjusted to be able to meet the infrastructure needs. The infrastructure costs might also fall on a smaller proportion of the new dwellings.³ The infrastructure provision cannot be compromised in an area where there are already high levels of congestion and a deficit of other facilities and housing genuinely affordable to key workers (ie relating to average local earnings) who would be deprived of the opportunity to be housed at social rents. In these circumstances some land that appears to be available might not be.
- 11.03 It cannot be assumed that the allocation of these sites will result in the houses required to meet the needs of the area (not those in scale and kind suggested by the flawed SHMA). Given the history of housing delivery on land allocations at Grove and Didcot, and the uncertainties being created by pending legislation, different forms of delivery are likely to be required.
- 11.04 Substantial allocations or reservations of land for the purposes of self/custom – build/finishing by individuals and associations of individuals⁴ will increase the likelihood of permissions being converted into dwellings. This will make the allocations more reliable and representative of the housing needs.
- 11.05 The housing models being adopted by the volume builders in the recent past and supported by the LPA include a housing mix that varies substantially from the objectively assessed need (ie that evident from the ONS 2011 Census and household trends). NPPF para 47 requires the LPA to, “set out their own approach to housing density to reflect local

¹ <https://portaldirector.wordpress.com/2015/12/03/government-confirms-value-of-land-should-reflect-planning-requirements/>

² Letter to Islington LBC re development at

³ If the ‘starter homes’ are additional to the affordable housing already exempt from s106/CIL contributions.

⁴ See Housing and Planning Bill 2015

circumstances". The Plan would be unsound if it did not include the evidence of the levels and incidence of under-occupation followed by a clear strategy of how, through the use of controls over density and mix (including housing suitable to meet the objectively assessed needs of the ageing population) this unsustainable level of underuse of the housing stock will be improved.

- 11.06 Building substantial numbers of dwellings larger than would be necessary to meet the objectively assessed need for smaller dwellings will delay the meeting of real needs and use excessive amount of resources; the labour, land and materials needed to meet the real housing needs.
- 11.07 In conclusion, the sites identified in the draft Plan could include land where the price and viability have been wrongly assessed and might not therefore be genuinely deliverable.

Is it realistic that a 5 year supply of deliverable housing land would be maintained throughout the plan period?

- 11.08 Most of the points made under the first question apply to the maintenance of the 5 year supply through to 2031.
- 11.09 The incoherent policies emanating from Government in stoking demand in attempting to increase the supply of houses cheaper to buy, but without contributing to necessary infrastructure, could actually depress the rate of building in the area.
- 11.10 Maintaining a five year supply of housing land will depend on policies that would ensure that adequate infrastructure will be delivered, including the housing affordable to key workers necessary to support the employment growth on which the SHMA assessment of 'need' was based. Whatever the theoretical housing land supply, the actual delivery of houses will grind to a halt in the absence of infrastructure which works and a local supply of key workers.