



MATTER 3: Overall housing provision in the plan and its distribution between sub-areas

HEARING STATEMENT on behalf of Arnold White Estates Ltd

Examination of Vale of White Horse Local Plan 2031: Part 2 - Detailed Policies and Additional Sites

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1.0 INTRODUCTION

- 1.1 This is a Hearing **Statement** submitted to the Inspector holding the Part 2 Examination of the Vale of White Horse **Local Plan (LPP2)** 2031 in July 2018. It is submitted by Gardner Planning Ltd (**GPL**) on behalf of Arnold White Estates Ltd (**AWEL**) which is a development promoter with land interests in The Vale of White Horse (**VWH**) District. GPL/AWEL made a detailed response to the LPP2 Publication Version on 20.11.17.
- 1.2 This Statement responds to the Inspector's List of Matters and Questions (15.5.18) which are a starting point for the round-table hearing session.



2.0 QUESTIONS 3.1, 3.2, 3.4, 3.5

2.1 No comments are made on these questions in this Statement.

3.0 QUESTION 3.3

Taking the objectively assessed housing needs of the Vale and the unmet needs of Oxford together, is the overall housing provision in the LPP2, its distribution between sub areas and its various components, consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?

3.1 The fragility of the OAN¹, devised in 2014 and on which LPP1 was based and thus LPP2 is based, has already been raised in Matters 1 and 2. Significant and recent ‘developments’ mean that the current housing figures are short-lived:

- Government/Oxfordshire has proposed a Growth Deal which includes an extra 100,000 homes in Oxfordshire
- The ‘Final Report’ by the NIC on the Cambridge/MK/Oxford Corridor envisages an extra 132,000 homes.

3.2 Whilst it may be claimed that this a matter to be addressed by another cycle in the planning process, it cannot be ignored as relevant context when looking at the numbers and spatial distribution in LPP2. These numbers will have entered the planning system before, for example, Dalton Barracks has even become available. LPP2 cannot slavishly follow the housing numbers in LPP1 which are, in any event, minima as explained in the Spatial Strategy Overview (emphasis added in bold):

*The Spatial Strategy makes provision for growth of around 23,000 new jobs, 218 hectares of employment land, and **at least** 20,560 new homes, to be delivered during the plan period from 2011 to 2031.²*

3.3 LPP2 also regards the housing figures as minima (emphasis added in bold):

*The Vale of White Horse housing requirement, on adoption of the Vale of White Horse Local Plan 2031 Part 2, or two years after adoption of Local Plan 2031 Part 1, whichever is sooner, will be **at least** 22,760 homes.³*

3.4 For the Abingdon/Oxford Fringe the total housing need for the plan period (without Oxford’s unmet need) is given in LPP1 Core Policy 8 as 5,438. The additional Oxford unmet need is said in

¹ HOU07

² LPP1 p36

³ LPP2 para 2.7

to be 2,200 in LPP2 Core Policy 4a and this is to be provided for in the Abingdon/Oxford Fringe Sub-Area.⁴

“The agreed quantum of unmet housing need for Oxford City to be addressed within the Vale of White Horse of 2,200 dwellings will be provided for through either strategic or additional sites provided for within the Abingdon-on-Thames and Oxford Fringe Sub-Area.”

- 3.5 This then totals a need for 7,638 homes in the Abingdon/Oxford sub area. However, LPP2 Core Policy 4a states it to be 7,512. The difference of 126 is unexplained. Sources of supply given in LPP2 Core Policy 8a are made up as follows:

	LPP2 (dwellings)	LPP1
Completions Apr 2011-Mar 2017	2,051	LPP1 2011/2016: 1,175 (+876)
Commitments Apr 2017-Mar 2031	1,401	LPP1 2016/2031: 2,011 (-610)
LPP1 allocations	1,790	same as LPP1
windfalls Apr 2017 - Mar 2031	308 (22p.a.)	LPP1 240 so +68, but 1 less year
Sub total	5,550	subtotal in LPP1 5,216 (so +334)
LPP2 allocations:		
North of East Hanney	80	
North-East of East Hanney	50	
East of Kingston Bagpuize with Southmoor (Fyfield and Tubney Parish)	600	
South-East of Marcham	90	
Dalton Barracks	1,200	
LPP2 total	2,020	
Total	7,570	

- 3.6 There are discrepancies between LPP1 (CP8) and LPP2 (CP8a). Completions rose by 876 which should see a similar reduction in commitments, but the drop is 610, meaning that 266 plots have been ‘lost’. A small number of completions would have been on windfall sites (average in LPP2 is 22 p.a.) so the difference between completions and commitments reduces to 588. If the whole difference could be attributed to windfalls, then either that would have be 244 extra windfalls (i.e. more than the entire allowance of 240 in LPP1 when even the average has increased to 22 p.a. in LPP2 from 16 p.a. in LPP1) or some completions have been on LPP1 allocated sites (although the figure of 1,790 remains) or LPP2 proposed sites. In either case there would be

- double-counting. The subtotal of completions, commitments, LPP1 allocations, and windfalls should remain the same, but in LPP2 has increased these by 334.
- 3.7 So, there needs to be explanation by VWH why the ‘target’ requirement has dropped to 7,512 when it should be 7,638 (-126), and why the delivery number to date (excluding LPP2 allocations) has increased by 334 dwellings.
- 3.8 If the 7,638 number were to stand and delivery was reduced by 334, then LPP2 needs to allocate sites for 2,422 dwellings not 2,020 - **a shortfall of 402 dwellings.**
- 3.9 **Alternatively**, LPP1 CP8 for the Abingdon/Oxford sub area (which identified VWH housing numbers only) underprovided for the 5,438 homes needed and left LPP2 to allocate sites for 722 homes for VWH own needs. To this, an additional 2,200 homes must be added for Oxford’s unmet needs, meaning that 2,922 homes must be allocated in LPP2, yet LPP2 CP 8a allocates 2,020 homes - **a shortfall of 902 homes.**
- 3.10 The VWH response to the Inspector’s questions of 27.3.18 Table 1 (District-wide) also demonstrates similar discrepancies. Completions have increased (an extra year) between LPP2 and LPP1 by 1,607 but commitments have decreased by 1,407, a loss/difference of 200. Even if windfalls (now 70 p.a.) account for some of that difference there is still a ‘loss’ of 121 homes. Unless some completions have been on LPP1 or LPP2 sites (in which the corresponding figures should reduce), there is no explanation. Also, LPP2 allocations are 3,420 in CP4a, not 3,450.
- 3.11 However, the Housing Supply Statement (April 2018)⁵ says at para 4.6 that “5 [of the LPP1 sites] are under construction” but a brief inspection of Appendix C shows no completions 2011 - 2017,
- 3.12 The VWH ‘explanation’ for the LPP1 CP4 figure (20,560) not being the sum of the CP8, 15 and 20 figures (which sum 20,971 - a difference of 411 not the 501 stated in the response) is that some extra was added to the sub-areas “*partly reflected the planned supply at the time*” which requires further interpretation/clarification by VWH.
- 3.13 Given that the housing figures in LPP1 and LPP2 are “*at least*”, and according to VWH included a margin, there is no justification for ‘reinterpreting’ the adopted figures in LPP1 and introducing a

⁵ HOU03.1

discount. The correct figure for Abingdon/Oxford sub area is to add the 2,200 from Oxford to the LPP1 figure of 5,438 without any adjustment.

- 3.14 The housing crisis identified in the ‘housing white paper’⁶ in which the introduction by the Prime Minister stated “*Our broken housing market is one of the greatest barriers to progress in Britain today.*” By the time that LPP2 is adopted (December 2018⁷), it will be 4 years since the Reg 19 consultation on LPP1, on which work probably started at least 2 years before that.
- 3.15 One of the principle concerns in Oxfordshire is meeting Oxford’s housing needs that have to be met beyond its administrative boundary. For the VWH this means that (modification already added):

*The Abingdon-on-Thames and Oxford Fringe Sub-Area is closest to and has the most frequent and reliable public transport linkages to Oxford WITH THE GREATEST POTENTIAL FOR FUTURE ENHANCEMENTS and for these reasons, the Vale’s agreed quantum of unmet need for Oxford (2,200 dwellings) is allocated to this Sub-Area as set out by Core Policy 4A: Meeting Our Housing Needs.*⁸

- 3.16 The same principle must apply to any increase in that number.
- 3.17 Thus LPP2 Policies CP 8a and 4a are not compatible with LPP1 (especially Policy CP8).

⁶ DCLG Fixing our broken housing market February 2017

⁷ OCD09 LDS Feb 2018

⁸ LPP2 para 2.14 (as amended)