

**Matter 3: Overall housing provision in the plan and its distribution between subareas**

**3.1 Is the proposal in the LPP2 to allocate 1,400 additional homes in the South East Vale Sub Area to support the economic growth of the Science Vale consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?**

No.

As outlined in our response to Matter 6, the additional allocations in the South East Vale sub-area are not consistent with the strategy provided by the LPP1.

Our primary concerns relate to:

1. Spatial strategy and the distribution of development; and
2. The deliverability of the quantum of development in the South East sub-area;

Each concern is addressed below.

***Spatial Strategy and Distribution of Development:*** Table 4.1 of the Council's Topic Paper 2 confirms that the Vale's apportionment figure of Oxford City's unmet housing needs will be met within the Abingdon sub-area, including from four LPP1 sites. It follows that the increase in the supply figure for the South East sub-region therefore is to meet the Vale's own housing needs.

This significantly increases the role and function the South East sub-region has in meeting the Vale's own housing needs when compared to the LPP1 Plan. In terms of supply, its role increases by as much as 5%. The additional growth focused in this sub-region should be more equitably distributed with the Western Vale to ensure a better alignment with the LPP1 spatial strategy and distribution of development.

***Deliverability:*** As outlined in our response to Matters 6 and 8, we are concerned that the level of development proposed in the South East sub-region, will not deliver in the manner envisaged. This is both due to market saturation and the unrealistic lead-in and delivery assumptions being employed by the Council.

**3.2 Is the proposal in the LPP2 not to allocate additional sites in the Western Vale Sub Area consistent with the strategy in the LPP1 and supported by proportionate evidence?**

No.

We are concerned that the strategy for the Western Vale sub-area conflicts with the strategy adopted in the LPP1. Our concerns are as follows:

1. The strategy in the LPP2 seeks to dilute the role clearly defined for the Western Vale in the LPP1;
2. The LPP2 does not make any further allocations within the Western Vale, as required by the LPP1;
3. The LPP2 increases the quantum of windfall development within the sub-area, without any robust justification.

A detailed assessment of these concerns is presented below.

**1.The Strategy for the Western Vale:** The LPP1 afforded an important role for the Western Vale in meeting the wider district's housing requirement. As indicated in our representations to Matter 1, the Western Vale had a role and function of delivering a housing supply in excess of what the Local Planning Authority considered was necessary to meet housing needs derived from the area. The over provision was considered necessary to meet the Vale's overall need for housing in full. This strategy was considered against reasonable alternatives within the iterative Sustainability Appraisal process, which was assessed through Independent Examination and found to be sound (para. 137 and 138 of the Inspector's Report refers).

Despite this tightly defined role for the Western Vale and the robustness of the strategy contained within the LPP1, the LPP2 seeks to introduce a revised strategy for the wider district. This is at the detriment of the Western Vale.

The LPP2 proposed an increase in the Abingdon sub-area's requirement of 2,074 dwellings and an increase in its supply of 1,632 dwellings. Table 4.1 of Topic Paper 2 (October 2017) identifies that all Oxford's unmet housing needs will be met within the sub-area. In overall terms, it therefore has an enhanced role in the delivery of the strategy in the LPP2, when compared to the LPP1.

Given that all Oxford's housing needs are to be met within the Abingdon sub-area, the additional 1,400 dwellings proposed in the LPP2 in the South East sub-area, must, by implication, be required to meet the Vale's own housing needs. We quantify this increased role as being as much as a 5% increase in its role in meeting the Vale's needs.

This compares to the Western Vale, wherein the LPP2 seeks to reduce its role. This is shown most notably in Table 1 below.

**Table 1 – Western Vale Requirement and Supply Comparison**

Category	Dwellings	Percentage of Overall No.s for VoWH
LPP1 Requirement	3,173*	15.06
LPP1 Supply	3,704	16.9
LPP2 Requirement	3,098	13.6
LPP2 Supply (Dwellings)	3,816	15.4

Having been adopted, the LPP1 has established both the spatial strategy for distributing development, including the proportional distribution of housing within the Local Planning Authority Area. This was its intended role and as outlined in para. 1.1 of the LPP1, it was not for the LPP2 to unpick this strategy.

Accordingly, the LPP2 should have provided all housing requirements and met all needs in accordance with the LPP1's spatial strategy. Such a strategy, which forms part of an Adopted Local Plan, must be the most appropriate when considered against reasonable alternatives, including the amended and less robust strategy promoted in the LPP2.

Had all housing needs to be met through both the LPP1 and 2 have been made in accordance with the Part 1 Plan's strategy, it would have had the following implications for the Western Vale.

**Table 2 – Apportionment of the Vale's Housing Needs and Oxford's Unmet Needs in Accordance with the Part 1 Plan's Spatial Strategy**

Category	Dwellings	Percentage of Overall No.s for VoWH	Comparison to Part 2 Plan
LPP2 Requirement	3,428	15.06	+330
LPP2 Supply (Dwellings)	4,182	16.9	+366

To remedy the deficiencies in the LPP2's spatial strategy, there is a need for the LPP2 to identify additional housing allocations at the Western Vale, including at Faringdon as the preeminent settlement within the sub-area. In this regard, we draw attention to my Client's outline application on land at Fernham Gate, Faringdon (Ref: P/18/V1362/0).

**2.Addional Allocations in the Western Vale:** Para. 1.1 of the LPP1 outlines the roles for each part of the Development Plan. The LPP1's role is to:

- Establish the spatial strategy for the District;
- Identify the number of new homes and jobs to be provided in the area over the Plan period to meet the Vale's own development needs in full;
- Set out the strategic policies to deliver sustainable development;
- Allocate large-scale, strategic sites. In the case of housing, the minimum threshold was 200 dwellings.

Para. 1.1 of the LPP1 also confirms the role of the LPP2 as being:

- To establish policies and locations for housing to meet the Vale's proportion of Oxford's housing need, unable to be accommodated within the City's boundaries;

- Policies relating to the Didcot Garden Town;
- To allocate additional development sites for housing and other uses; and
- Other detailed development management matters.

Given these tightly defined roles, the LPP2 should have made allocations in accordance with the LPP1 i.e. allocated sites to provide an additional 222 dwellings within the Western Vale, in line with Core Policy 20. Notwithstanding this clear policy position, this requirement has not been taken forward into the LPP2.

Para. 2.133 of the LPP2 outlines the justification for this significant alteration, stating that the requirement had already been planned for. This analysis fails to recognise that:

1. The overall supply has only increased by 112 dwellings since the adoption of the LPP1;
2. The requirement for the Western Vale has been reduced by 75 dwellings from the LPP1, with no robust justification provided; and
3. The level of windfall development has been increased by 68 dwellings (28%).

With regard to Point 1, we have raised concerns in our representations to Matter 8 that not all existing commitments will deliver as expected. Accordingly, it would be prudent for a non-implementation allowance to be provided within the LPP2. This would reduce the supply within the Western Vale to below that of the LPP1, as outlined in Core Policy 20.

In addition, given that there is no robust justification, or indeed scope within the LPP2 to reduce the Western Vale's requirement further, it should revert back to the LPP1 position (i.e. 3,173 dwellings).

We discuss our concerns relating to windfall provision in regard to Question 3.3 and in our response to Matter 8.

Together with our other concerns relating to the Council's approach to housing supply with the LPP2, there is a clear justification for reintroducing the need for additional allocations in the Western Vale.

**3.Windfall:** As outlined in our representation to Matter 8, we are concerned with the increase in windfall provision proposed in the Western Vale.

The Council's revised evidence is provided in para. 4.22 of Topic Paper 2 (October 2017) and at para. 2.13 of its Addendum (February 2018).

We have two fundamental issues with the Council's evidence as follows:

1. It falls short of the necessary evidence to demonstrate that windfall provision will continue to be a reliable form of development in the local area, particularly with the number of larger strategic sites likely to come forward over the Plan period; and
2. The evidence only relates to the number of windfalls over the entire district. No information is provided to justify the increase for each sub-region, including the Western Vale.

The level of windfall provision within the Western Vale is proposed to rise from 240 dwellings to 308 dwellings (an increase of 28%). No evidence has been provided to justify this increase. Moreover, windfall development is now proposed to form 8% of the Western Vale's supply, which is significantly higher as a proportion than either the South East (3.6%) and Abingdon (4%).

To ensure a consistent approach across all sub-areas, windfall provision within the Western Vale should be limited to 4% of its supply. Consequently, there is a need for a site or sites within the Western Vale sub-area to accommodate an additional 156 dwellings. In this respect we draw attention to our Client's current application on land at Fernham Gate, Faringdon (P18/V1363/0). The Council's latest HELAA work confirms that the site is suitable, available and achievable to be developed for housing within the next five-year period (Site Ref: FAR15 refers).

**Summary:** We do not believe that the strategy to accommodate additional allocations within the Western Vale is consistent with the strategy outlined in the LPP1 and is not supported by robust evidence.

Consequently, there is a need for:

1. The LPP2 to distribute all housing needs, including Oxford City's unmet housing needs, in accordance with the LPP1's spatial strategy and distribution of development. This strategy was found sound at Examination and therefore must be considered as the most appropriate strategy for accommodating development in the Vale, when compared against reasonable alternatives, including that proposed in the LPP2. It is also beyond the scope of the LPP2 to revisit strategy and distribution of growth matters.
2. The LPP1 envisaged the need for additional allocations to be made within the Western Vale in the LPP2. For the reasons outlined above, the Council's justification for not requiring further allocations is not robust and is again beyond the scope of the LPP2.
3. The increase in the quantum of windfall provision in the Western Vale is not justified by the Council's evidence and is a proportionally higher level of windfall development than both other sub-areas. The windfall allowance should therefore reduce to c.4% of the Western Vale's supply.

Taken together, these considerations, as well as the other points made within our participation statements, justify the need for (a) further allocation(s) to be made within the Western Vale.

In this regard, we draw attention to my Client's application (P18/V1363/0).

**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?**

No.

As outlined in our participation statements, we have a number of concerns relating to the distribution of housing provision in the LPP2, its distribution between sub-areas, its consistency with the strategy in the LPP1, the various components of supply and the evidence base supporting the LPP2.

For brevity, these concerns are not repeated here.

**LRM Planning**  
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