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# Examination into the Vale of White Horse Local Plan Part 2

Written Statement on behalf of Ptarmigan Land Ltd.

Hearing Statement: Matter 8

June 2018



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Housing land supply, viability, delivery and monitoring**

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## **INTRODUCTION**

This statement is submitted to the Examination into the Vale of White Horse Local Plan Part 2 on behalf of Ptarmigan Land Ltd. (hereafter referred to as 'our client')

This statement refers to the following Issue, identified by the Inspector in his Matters and Questions:

- Matter 8: Housing land supply, viability, delivery and monitoring

## **MATTER 8 – HOUSING LAND SUPPLY, VIABILITY, DELIVERY AND MONITORING**

### **8.1 DO THE PROVISIONS OF THE LPP2 MAKE THE NECESSARY CONTRIBUTION TOWARDS A FIVE YEAR SUPPLY OF DELIVERABLE HOUSING SITES AGAINST THE STATED HOUSING REQUIREMENT FOR THE DISTRICT AS A WHOLE AND THE SCIENCE VALE RING FENCE AREA?**

8.1.1 The Innovation Village at Harwell campus provides a form of development that has not been delivered previously in the VoWH and is likely to offer a product that is not what is being delivered by the sites elsewhere or currently in the “system” – they will offer homes to people with a different need and lifestyle.

8.1.2 It is also recognized that the housing supply in Science Vale is not as strong as was the case in the preparation of LPP1, by virtue of the delays to the delivery of some key sites. Notwithstanding the fact that some sites have outline consent, there is a risk that their commencement may therefore not come forward in the timescales indicated by the District Council, particularly where they are scheduled to deliver housing in 2018/19, including:

- Crab Hill, north east Wantage – 1500 homes
- Land at Grove Airfield, Grove – 2500 homes

8.1.3 In addition, land to the west of Great Western Park, Didcot (4254 homes), is understood to only have a resolution to grant outline consent, but is expected to deliver housing in 2019/2020.

8.1.4 Whilst there are some strategic sites that are currently delivering on schedule, there is a significant reliance on the delivery of sites in the next 1-2 years, whereby if they were to be delayed further, the housing supply figure could drop significantly. In our experience, trajectory's are often optimistic and delays to the trajectory can easily occur due to a wide range of circumstances. Therefore, developments are frequently delayed and deliver more slowly than the trajectory initially identified; but rarely deliver faster.

8.1.5 As discussed in our response to Matter 3, the Ring-fence policy remains valid and up to date policy, as it is needed to protect the particular needs within the Science Vale.

8.1.6 In light of the above, as stated in our response to Matter 7, it is important to secure an ongoing supply of housing across the district, including within the Science Vale. Across the district, it is considered that the identified trajectory is ambitious, albeit potentially achievable, on which basis, assuming the identified trajectory is correct, a 5 year supply of housing can be achieved. (We understand that there is currently an appeal regarding a proposed development at Sutton Courtenay (ref APP/V3120/W/17/3180396) that is seeking to challenge the District's housing land supply assumptions).

8.1.7 That said, given the above identified differences to other allocations in the LPP2 and the particular circumstances at Harwell campus, there could well be delays to its suggested delivery.

8.1.8 We recognize that the April 2018 Housing Land Supply statement for the VoWH identifies a 20% buffer for the Science Vale area, due to the need to ensure delivery of housing in this area and recognizing the “persistent under-delivery” in this area, albeit then utilizing the Liverpool method to address the backlog in supply.

8.1.9 Given the above, we therefore consider the allocations made in LPP2 to be essential to ensure a sound approach is maintained. It is also essential that particular emphasis should be placed on the monitoring and review mechanisms within LPP2, as set out further below, so as to respond quickly and effectively if housing delivery within the Science Vale is delayed.

**8.2 DO THE PROVISIONS OF THE LPP2 MAKE THE NECESSARY CONTRIBUTION TOWARDS MEETING THE STATED HOUSING REQUIREMENT FOR THE DISTRICT AS A WHOLE AND THE SCIENCE VALE RING FENCE AREA OVER THE FULL PLAN PERIOD TO 2031?**

8.2.1 For the reasons outlined above, we consider that the housing trajectory identified to be “just enough” to deliver the identified housing requirement for the Science Vale. It is also worth noting the emerging JSSP for Oxfordshire and the emerging revised NPPF, which in its draft form proposed a Housing Delivery Test.

8.2.2 As stated above, we consider it essential that particular emphasis is placed on the monitoring and review mechanisms within LPP2. It is also worth recognizing that it is not just the quantum of housing delivered, but the type of housing, particularly given the form and type of housing proposed within the Innovation Village at Harwell campus.

8.2.3 Background Paper 3 (Employment & Housing Growth) to the LPP2 identifies the need for rented / starter homes (paragraph 3.17). Background Paper 4 (Housing Needs) also demonstrates a shortfall in private rented accommodation (paragraph 4.31). Therefore, the monitoring mechanisms in LPP2 should focus on the type as well as the quantum of housing delivered, particularly within Science Vale and Harwell campus, where the needs are more focussed and bespoke.

**8.3 ARE THE FIGURES FOR COMPLETIONS AND KNOWN COMMITMENTS (BOTH OVERALL AND IN EACH SUB-AREA) ACCURATE? SHOULD ANY ALLOWANCE BE MADE FOR THE NON-IMPLEMENTATION OF COMMITMENTS?**

We have no comment to make on this issue

**8.4 IS THE REVISED CALCULATION FOR WINDFALL SITES IN THE LPP2 (BOTH OVERALL AND IN EACH SUB-AREA) COMPARED TO THE LPP1 SUPPORTED BY PROPORTIONATE EVIDENCE AND CONSISTENT WITH NATIONAL POLICY?**

We have no comment to make on this issue

**8.5 HAS THE CUMULATIVE IMPACT OF THE POLICIES AND STANDARDS OF THE LPP1 AND LPP2 TOGETHER WITH NATIONALLY REQUIRED STANDARDS ON THE VIABILITY OF DEVELOPMENT BEEN APPROPRIATELY ASSESSED? WOULD THESE PUT THE IMPLEMENTATION OF THE PLAN AT RISK AND WOULD THEY FACILITATE DEVELOPMENT THROUGHOUT THE ECONOMIC CYCLE?**

We have no comment to make on this issue

**8.6 DO LPP2 CORE POLICY 47A AND THE MONITORING FRAMEWORK IN APPENDIX N PROVIDE A SOUND BASIS FOR MONITORING IMPLEMENTATION OF THE LPP2 AND FOR THE NECESSARY ACTION TO BE TAKEN SHOULD THE LPP2 NOT BE DELIVERED AS ENVISAGED?**

8.6.1 Core Policy 47a within LPP2 identifies that in the event of the Part 2 policies not delivering in accordance with the Monitoring Framework in Appendix N, then the Council will identify the reasons and take action, which may include: additional funding for infrastructure, accelerating delivery elsewhere, identifying alternative sites to come forward and a full or partial review of the plan.

- 8.6.2 In reviewing Appendix N to the LPP2, it is clear this is lacking in both teeth and purpose, in particularly in relation to Science Vale. As stated in our response to Matter 7, the needs of Science Vale are important to the local, regional and national economy, quite separate from the remainder of the district. It is for this reason that the "ring-fence" still applies.
- 8.6.3 However, Appendix N fails in that it:
- does not sufficiently highlight the need to monitor the delivery of both homes and jobs within Science Vale;
  - does not seek to monitor the delivery of types / forms / tenures of housing, eg PRS, which is essential given their specific role within Science Vale (to reflect the type of jobs and associated lifestyle, timescale and purpose)
  - in relation to Harwell, it does not require the monitoring of the delivery of jobs, facilities or the infrastructure planned for the Innovation Village – given the specific nature of these proposals, particular monitoring mechanisms are considered essential so as to respond to changing circumstances, the more dynamic nature of the campus and its particular identified needs.
- 8.6.4 Furthermore, if a problem in the delivery of the proposed developments occurs within Science Vale, then there are insufficient safeguards within the policy framework to require any re-provision to take place within the Science Vale (and importantly not outside of it). Importantly, such problems may of course not be solely related to housing delivery and the ring-fenced housing supply.
- 8.6.5 As drafted, CP47a merely states that when considering alternative sites, these will need to be "*in general accordance with the spatial strategy of the Part 1 Plan*".
- 8.6.6 Without better and more specific mechanisms in place for Science Vale, notwithstanding the ring-fence policy, if one site fails to deliver for whatever reason, the particular needs and target job growth within the Science Vale could be lost or undermined through the resulting provision outside of the Science Vale area. Therefore, additional safeguards are essential within CP47a and Appendix N to reflect this.
- 8.6.7 As also stated in our response to Matter 7, we consider it is vital that there is a monitoring mechanism within the Plan to enable the Council to monitor whether the Enterprise Zone is delivering sufficient commercial uses on site, especially given the removal of a portion of the Enterprise Zone for housing development. However, there is currently no mechanism to monitor the actual breakdown of floorspace per use class over time. Given the purposes of the Enterprise Zone, and that the '9000' jobs to be generated at Harwell are solely for above-trend based jobs, such monitoring must focus on "above-trend" jobs (ie not retail and leisure etc). This will enable the Council to identify with more certainty that the inclusion of housing within the Enterprise Zone is not compromising the ability to provide sufficient employment generating uses which contribute to the objectives of the Enterprise Zone.
- 8.6.8 The land in the Enterprise Zone is fixed but the jobs generated could vary significantly from the assumptions depending on what is needed at any time. The evidence supporting LPP2 has had to make reasonable assumptions based on the information available at this point in time. However, the policy framework needs to have a mechanism that can respond if these assumptions are not achieved. For example, there is potential for "land hungry" uses, such as Research and Development, that in themselves do not have a high number of jobs for the floorspace built, to locate themselves within the site. These will continue to have an important role at Harwell but will not contribute generate the jobs average assumed in the report. They also do not generate business rates to meet the Enterprise Zone objectives or contribute towards funding infrastructure. Such an occurrence could consequentially lead to a reduction in the jobs that are assumed can be accommodated on the remaining Enterprise Zone land.

- 8.6.9 As such, it is critical that a mechanism be put into place to monitor the proportion of commercial vs non-commercial uses on the site, to ensure that the objectives of the Enterprise Zone can be achieved, and the site can generate the number of employment opportunities identified within the Evidence Base. This should be linked to a phasing requirement for the housing allocation to enable a review to be undertaken and other land to be brought forward at the Campus for the housing if necessary. 
- 8.6.10 In addition to the above, whilst we are aware of the technical constraints affecting the land at Harwell campus, none appear to be “showstoppers” to the principle of development. In the event that there was a shortfall in housing supply or a delay in the delivery of the proposals, then the monitoring mechanisms would need to be engaged so as to overcome any shortfall and ensure the economic objectives for Harwell Campus are not undermined.
- 8.6.11 Furthermore, it is considered that LPP2 should be reviewed before the new minimum 5 year legal requirement in any event, so as to reflect any changes in circumstances and ensure the delivery of its aspirations and objectives. Notwithstanding the implications of BREXIT, such changes in circumstances could include:
- The emerging proposals for Oxford - Milton Keynes - Cambridge corridor, including the proposed infrastructure delivery (eg Expressway routes etc) and funding for more infrastructure delivery
  - Take up of employment land on key employment sites (including Harwell campus) and the potential need for more land to be identified
  - Any constraints to delivery of the identified proposals
  - Success (or otherwise) of the Enterprise Zones
  - The emerging JSSP for Oxfordshire
  - Changes to funding
  - The new NPPF (although it is recognized this is likely to have transition arrangements within it)

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