



Gladman Developments Ltd

Vale of White Horse Local Plan 2031 Part 2

Examination Stage 1: Hearing Sessions

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

1.1 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?

1.1.1 As identified by Gladman within their hearing statements, there are a number of scenarios that could result in the Council being unable to demonstrate a five year housing land supply. Given the presence of these scenarios, it is surprising that the Local Plan Part 2 does not seek to allocate additional smaller sites to provide additional flexibility in the event that the larger allocations at Dalton Barracks and Harwell Campus do not come forward either in full (if the Inspector does not consider their inclusion within the plan is justified by the Council's evidence base), or if the constraints to delivery identified by both Gladman and others around the development industry do prove to be problematic for the Council in meeting their anticipated housing trajectory.

1.1.2 It is also surprising that the Council have not built in any allowance for non-implementation within the Local Plan Part 2. It is Gladman's experience that other authorities build in an allowance for non-implementation of sites to provide further flexibility in the event that sites do not come forward for delivery as planned. Gladman consider an allowance for non-implementation in the region of 10% is justified and would provide further flexibility.

Oxford's Unmet Needs

1.1.3 The plan also contains limited flexibility to react to an increase in the working assumption figure for unmet needs, specifically from Oxford (as set out within Gladman's hearing statement for Matter 2). This is because of:

- a) Overly optimistic assumptions regarding lead in times and the delivery of housing on strategic sites; and
- b) Unrealistic expectations in respect of windfall development.

Further Allocations

- 1.1.4 Together the Part 1 and Part 2 Plans are heavily reliant on large sites. In respect of the Part 2 Plan, of the allocated sites only three have a capacity of less than 100. The Part 2 Plan should be providing a wider portfolio of sites in terms of their size and location ensuring that a range of house types may be provided and that a full range of house builders may be represented. Smaller sites are less likely to have major infrastructure requirements and may be brought forward for development quickly.
- 1.1.5 The Part 2 Plan provides for a total of 12,150 new dwellings in the South Eastern Vale over the Plan period. Some 1536 dwellings have been completed in the Sub Area between 2011 and 2017 (an average of 256 dwellings per annum). A total of 10,614 dwellings remain to be delivered during the remainder of the plan period which is equivalent to 758 dwellings per annum. This is a significant increase which will be extremely challenging to achieve especially having regard to substantial growth proposals at Didcot being put forward by South Oxfordshire Council in its Local Plan.
- 1.1.6 There is clearly high degree of risk that the South Eastern Vale will not deliver the anticipated numbers of dwellings during the plan period and as a consequence the Plan is not effective and is unsound. This should be remedied by the allocation of additional available and readily deliverable sites in the Western Vale, within which the Council proposes no further allocations within the Local Plan Part 2.

1.2 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?

- 1.2.1 Core Policy 4a sets out how the Council proposes to meet its housing target of at least 22,760 homes across the plan period. In terms of completions, commitments and allocations in Parts 1 and 2 of the Local Plan, a total of 23,648 new dwellings are anticipated. A further 1,100 dwellings are expected to be delivered as windfalls, either through the Neighbourhood Plan process or through the approval of planning applications on unallocated sites.
- 1.2.2 The Part 2 Local Plan proposes that there should be no additional site allocations in the Western Vale Sub Area which has a housing requirement of 3,173 dwellings in the Part 1 Local Plan. Gladman considers that the approach to the Western Vale is unsound in that flexibility in the Western Vale by way of additional housing allocations should be provided in the event that allocations in the Part 1 Local Plan do not come forward as anticipated or deliver less dwellings than expected and/or that, as explained above, the expected level of windfalls does not materialise. Elsewhere in these representations, Gladman expresses concerns about a number of proposed allocations in the Part 2 Local Plan. If, as Gladman suggests, these allocations are removed from the Local Plan, there will be a need for additional allocations to be made and there are suitable and available sites in the Western Vale which should be considered for allocation.
- 1.2.3 Gladman has a number of concerns regarding how the Council proposes to meet its housing target. Firstly, whilst Gladman supports in principle the objective of the Plan to seek to accommodate 2,200

homes to assist in meeting Oxford City's unmet housing needs, it considers that there may be a need for Vale of White Horse to accommodate in excess of 2,200 homes as its contribution to meeting Oxford's unmet need.

- 1.2.4 South Oxfordshire has not agreed to accommodate the 4,950 dwellings which was its apportionment of Oxford's unmet need as determined by the Oxfordshire Growth Board at its meeting on 2th September 2016. In its Publication Plan currently subject to consultation, South Oxfordshire is proposing to accommodate only "around 3,750 homes" as its contribution towards meeting Oxford's unmet need. There is therefore currently a potential shortfall of 1,200 dwellings arising from South Oxfordshire's position which will need to be redistributed across West Oxfordshire, Vale of White Horse and Cherwell Districts in their local plans. However, the Cherwell Local Plan was adopted in 2015 and a partial review to consider meeting its share of Oxford's unmet need is at an early stage. The West Oxfordshire Local Plan is currently subject to examination. Unlike the other authorities in the Oxfordshire Strategic Housing Market Area, VOWH is therefore well placed to address this situation now and flexibility to address any subsequent increase in its apportionment of Oxford's unmet need should be built into the Local Plan Part 2.

Local Plan Part 2 Allocations

Dalton Barracks

- 1.2.5 Gladman has significant concerns that the delivery of 1200 dwellings on this site is not feasible in the plan period. These concerns relate firstly to the lead in time for large strategic sites generally and secondly to the specific circumstances pertaining to this site.
- 1.2.6 Gladman understands the need for large scale urban extensions and the role that they can play in delivering the long term supply of housing. However it is imperative that the local planning authority is realistic in relation to the delivery and timescales associated with these types of developments. Delays in sites coming forward are due principally to lead in times, gaining outline consent, negotiations on Section 106 agreements, reserved matters applications, discharge of conditions, the need for major infrastructure investments, site clearance and difficulties caused by sites in multiple ownerships.
- 1.2.7 Generally Gladman considers that the Council is overly optimistic regarding the timing of housing delivery on a substantial number of allocated sites. In considering the Councils trajectory, Gladman refers to a study published in September 2017 by Nathaniel Lichfield and Partners based on an assessment of 70 large sites (500 – 2,000 dwellings). The study found an average lead in time of 3.9 years for large sites prior to the submission of the first planning application, and an average of 5 years for the planning approval period, with a further period of 9-10 months to first housing delivery.
- 1.2.8 In the particular circumstances of this site, firstly it is in the Green Belt and the submission of an outline planning application is extremely unlikely until confirmation of the release of the site from the Green Belt is confirmed when the Part 2 Local Plan is adopted. This unlikely to occur until early in 2019 at best. In addition Policy 8b requires the preparation of a Supplementary Planning

Document to guide the development of the site. This will need to be subject of public consultation prior to adoption and one would expect this to be in place prior to the determination of any planning application.

- 1.2.9 The site is currently occupied by military units and although the Defence Infrastructure Organisation says that they will vacate the site prior to 2026, it is unclear as to how development of the site might start prior to that date. This is clearly the expectation of the Council which anticipates the delivery of the first 50 dwellings on the site in 2024/25.
- 1.2.10 Gladman consider this site in more detail in their Hearing Statement for Matter 5.

Harwell Campus

- 1.2.11 In his report on the examination of the Vale of White Horse Part 1 Local Plan, Inspector Rivett unequivocally rejected the Council's proposals for two housing allocations totalling 1,400 dwellings on land adjacent to the Harwell Campus on the grounds that the exceptional circumstances necessary to justify such developments did not exist. Whilst the location of the proposed allocation for the Harwell Campus in the Part 2 Plan differs from those considered in the Part 1 Local Plan, the Inspector did consider an alternative proposal for the development of housing within the northern part of the Campus. In paragraph 121 of his report, the Inspector found that *"This would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously-developed land. However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus. Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist."*
- 1.2.12 Given the conclusions of the Inspector for Part 1 of the Local Plan, Gladman do not consider that the allocation of Harwell Campus is justified within the Local Plan Part 2. Given this, if the Inspector for the Local Plan Part 2 agrees that the Council have not adequately demonstrated that exceptional circumstances exist for the site's inclusion within the Local Plan Part 2, then this would have significant implications for the Council's ability to deliver their housing requirement, given the lack of flexibility built into the Local Plan Part 2 (i.e. not identifying additional sites to come forward in advance of the larger strategic allocations to maintain a five year housing land supply before they are delivered).

1.3 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?

- 1.3.1 Gladman has no comments to make on this question.

1.4 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?

1.4.1 Gladman considers that the Council's expectation that 1100 new dwellings will be delivered as windfalls, either through Neighbourhood Plans or through the development management process, is unrealistic. There is no guarantee that Neighbourhood Plans will be prepared or that where they are prepared, they will deliver significant levels of new housing. With an up-to-date Local Plan in place, the potential for a substantial number of new dwellings to be delivered through the development management process is also unlikely (particularly without a positive policy framework to enable them and to secure a minimum level of housing allocations).

1.4.2 Indeed, Core Policy 4 of the Local Plan Part 1 states:

"Development outside of the existing built area of these settlements will be permitted where it is allocated by the Local Plan 2031 Part 1 or has been allocated within an adopted Neighbourhood Development Plan or future parts of the Local Plan 2031. This development must be adjacent, or well related, to the existing built area of the settlement or meet exceptional circumstances set out in the other policies of the Development Plan and deliver necessary supporting infrastructure."

1.4.3 It is clear that proposals that come forward through the development management process will be in conflict with Core Policy 4, which means that there is limited flexibility for sites to come through this process. Given the lack of flexibility built into the Local Plan Part 2 by the Council, due to the lack of an allowance for non-implementation and by not allocating further smaller sites for development, there is a significant prospect that development will have to come forward via the development management process for the Council to continue to maintain a five year housing land supply.

1.5 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?

1.5.1 Gladman has no comments to make on this question.

1.6 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?

1.6.1 The method of calculating the housing supply differs between the two housing delivery areas and that of the district as a whole. The Science Vale Ring Fence area (referred to Ring Fence hereafter) uses the Liverpool method, whilst the Rest of District (RoD) uses Sedgfield. A combination of both methods is used to calculate the housing land supply of the district as a whole.

- 1.6.2 Core Policy 5 of LPP1 is the development plan's Housing Supply Ring Fence policy. It is clear that the ring fence area is to be treated as a separate subarea with its own housing requirement. It also clearly states that:

“the supply calculations for the ring-fence area and the rest of the district area will be combined to provide a district wide calculation.”

- 1.6.3 It does not, however, provide any guidance as to how these factors play out in practice. Gladman had hoped that the LPP2 would provide more clarity, particularly with regard to the *“appropriate measures”* as set out within Core Policy 47a, at any point that the Local Plan Part 2 is failing to deliver housing as anticipated within the Council's housing trajectory.
- 1.6.4 Gladman are aware of the recent appeal in Wantage (APP/V3210/W/16/3145234), 'where the Council reiterated that the overall housing supply would determine if paragraph 14 should be engaged or not. It is noted that the Council have in the past considered themselves able to demonstrate a supply in both housing delivery areas, only for an Inspector to determine that they are unable to do so.
- 1.6.5 At this recent appeal, the Inspector concluded that, with the evidence presented to him, the Council could not demonstrate a five-year housing land supply within the Ring Fence area (paragraph 22).
- 1.6.6 The Inspector discussed the implications of a shortfall in housing land supply in the Ring Fence Area (§35), concluding that:

“This does not, however, somehow allow the Council to park the issue of a lack of supply in the ring fence area. One of the indicators in LP2031's Monitoring Framework, concerning the successful operation of Core Policy 5, is whether a five year supply of deliverable housing sites is maintained in the ring fence area. If this is not maintained, then the measures in Core Policy 47 (Delivery and Contingency) are to be implemented. One such measure is,

‘identifying alternative deliverable sites that are in general accordance with the Spatial Strategy of the plan through the Local Plan 2031: Part 2 or other appropriate mechanism’

It is reasonable to consider that an ‘other appropriate mechanism’ could be the granting of planning permissions on alternative deliverable sites, within the ring fence area, which are in general accordance with the Spatial Strategy of LP2031.”

- 1.6.7 Gladman consider that the approach advocated is an effective and sensible way of rectifying under supply in either the ring fence area, or the rest of the District, in the event of a deficiency in housing land supply.

¹ Mather House & Greensands, White Road and Reading Road, East Hendred, Wantage (ref APP/V3210/W/16/3145234)

- 1.6.8 It would be for the decision maker to come to a view as to the weight to be attributed to the lack of a five-year supply in the ring fence area, or the rest of the District, when assessing a proposal against the development plan as a whole.
- 1.6.9 Appendix N of the Local Plan Part 2 is not sufficiently detailed enough to establish the “*appropriate mechanisms*” either.
- 1.6.10 Subject to the Council identifying the “*appropriate mechanisms*”, then Gladman would consider that Core Policy 47a would be effective if the plan were not delivering as anticipated. However, as currently drafted the plan is unclear as to what the “*appropriate mechanisms*” are, and therefore the plan is not currently effective in the terms of §182 of the Framework.