

VALE OF WHITE HORSE LOCAL PLAN 2031 (Part 1 Strategic Sites and Policies)

EXAMINATION HEARING STATEMENT

MATTER FOUR:

Unmet Housing Needs

Respondent Nos: 874832/874516

August 2015

Vale of White Horse Local Plan 2031

Hearing Statement on Matter Four: Unmet Housing Needs

Question 4

- 4.1 Is the approach to meeting within the District any housing needs which cannot be met elsewhere in Oxfordshire, as set out in policy CP2, soundly based and does it accord with national policy?
- 4.2 What is the likely timescale for agreement being reached between the relevant authorities on (i) the scale of unmet needs in Oxford City (and any other district) (ii) the most appropriate way of any unmet needs being provided for?
- 4.3 Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?
- 4.4 If you contend that the approach set out in policy CP2 is not soundly based should the Local Plan be delayed pending agreement on 5.2 (i) and (ii) above or could modifications to the plan be made to make it sound?

The 2014 Strategic Housing Market Assessment (SHMA) identifies a significant housing need arising in Oxford City. This identified need is an uplift to the needs being planned for in the adopted Oxford City Core Strategy 2011. Furthermore, the work on the SHMA does not conclude what the objectively assessed needs for Oxford City should be, instead it provides for a range of between 24,000 and 32,000 new homes over the period 2011-2031.

Notwithstanding the lack of certainty in relation to the objective needs in Oxford City (and by implication the HMA as a whole), it is clear that Oxford City will not be able to accommodate all of its housing needs. The latest Strategic Housing Land Availability Assessment (SHLAA) identifies a capacity for only about 10,000 homes in the City in the period 2011-2031. However, the adjacent local authorities, including Vale of White Horse District, are challenging this figure and have commissioned a study by Cundall which indicates that Oxford actually has the land capacity for around 16,000 homes. Nevertheless, this figure still indicates a significant shortfall in Oxford's supply which, if apportioned equally between the adjacent local authorities, would require each authority to accommodate between 2,000 and 4,000 additional new dwellings.

The City Council's boundary is tightly drawn and the City is constrained by its size, capacity, and land availability as well as by Green Belt and other land use designations.

There are also significant pressures which indicate the need to urgently address the Government's commitment to "boost significantly" the supply of new homes. Pressures here are greater than other parts of the County and as a consequence the need to address housing shortages are even more urgent.

Oxford is one of the UK's least affordable housing locations, with the cost of buying a house in Oxford 11 times the average salary. The strength of economic growth in the area will continue to place pressures on housing as a result of migration and household growth. Serious social and economic issues will be exacerbated if housing supply is not appropriately (and urgently) addressed.

Given the evidence available there is likely to be a substantial unmet need in Oxford City between 2011 and 2031. This shortfall will need to be met in neighbouring authorities including Vale of White Horse. The resulting implications for Vale of White Horse are likely to be significant and these issues should be appropriately addressed now through this Local Plan.

There is no basis in the NPPF for an approach which, having identified the objectively assessed needs for the Housing Market Area, does not meet these needs in full.

There are very close similarities between the situation in Oxfordshire and that in Coventry and Warwickshire. In Coventry and Warwickshire, significant housing needs will arise in the Coventry City administrative area, and like Oxford, it too has a tightly drawn boundary and is constrained by Green Belt. Whilst its Plan making is behind neighbouring authorities there is a recognition that there will be unmet needs which will need to be accommodated in neighbouring authorities. The Warwick District Local Plan was prepared and submitted on the basis of objectively assessed needs but leaving the issue of unmet needs arising from Coventry City to be dealt with by way of a Review of the Plan in cooperation with the other Warwickshire Councils. The approach has recently been found to be unsound by the Local Plan Inspector. A copy of his letter is appended to this Statement for ease of reference. His findings, particularly at paragraph 21 and 24-28, are relevant to the situation in Oxfordshire.

Like Warwick, Vale of White Horse have submitted a Plan in the absence of a clear strategy to meet the objectively assessed needs for the Housing Market Area in full. Like Warwick there is clear and upto-date evidence regarding objectively assessed needs produced jointly by all the relevant authorities and there has been the opportunity to consider the evidence on objectively assessed needs and put forward a strategy to meet it in full.

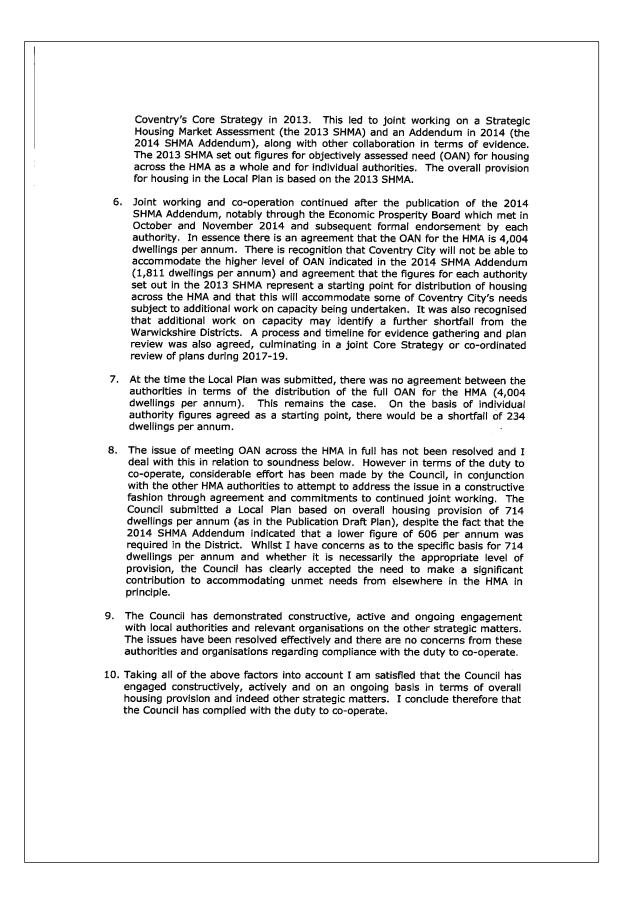
In these circumstances a review mechanism is not considered to be appropriate or a sound basis on which to plan to meet the significant housing needs of the area.

Whilst there are clearly benefits to having an adopted Plan in place as soon as possible, this should not be at the expense of having a sound Plan which effectively deals with key strategic matters. Postponing the decision to a review of the Plan leaves key housing matters undetermined and timescales for appropriate planning and delivery unknown. The need for proper strategic planning, to

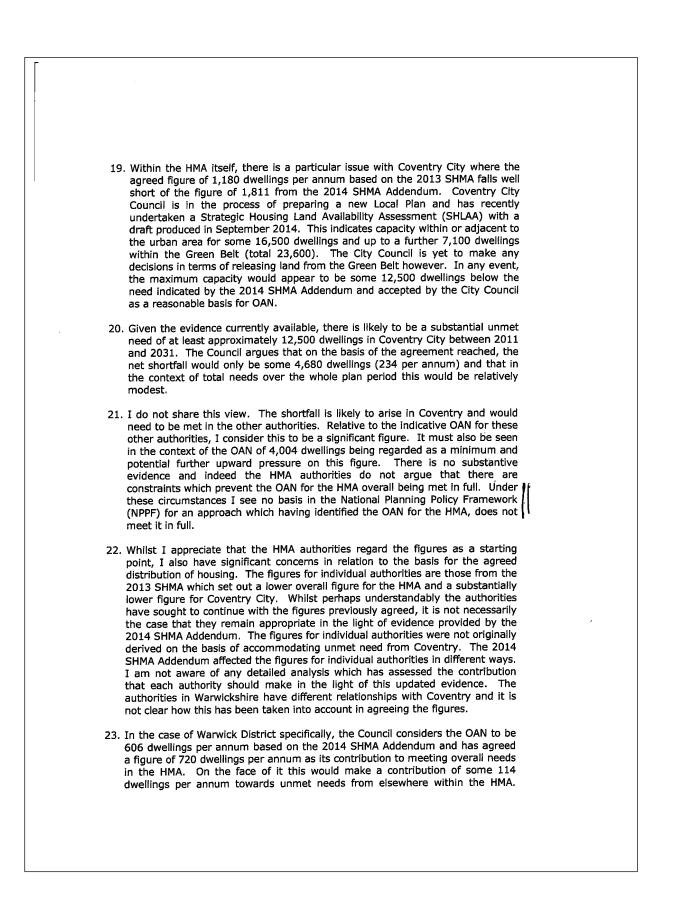
meet the Housing Market Area's housing needs in full and to boost significantly housing supply, are fundamental requirements of the NPPF and putting off decisions means that the Local Plan is not positively prepared, justified, effective or consistent with national policy and renders it unsound.

Appendix 1

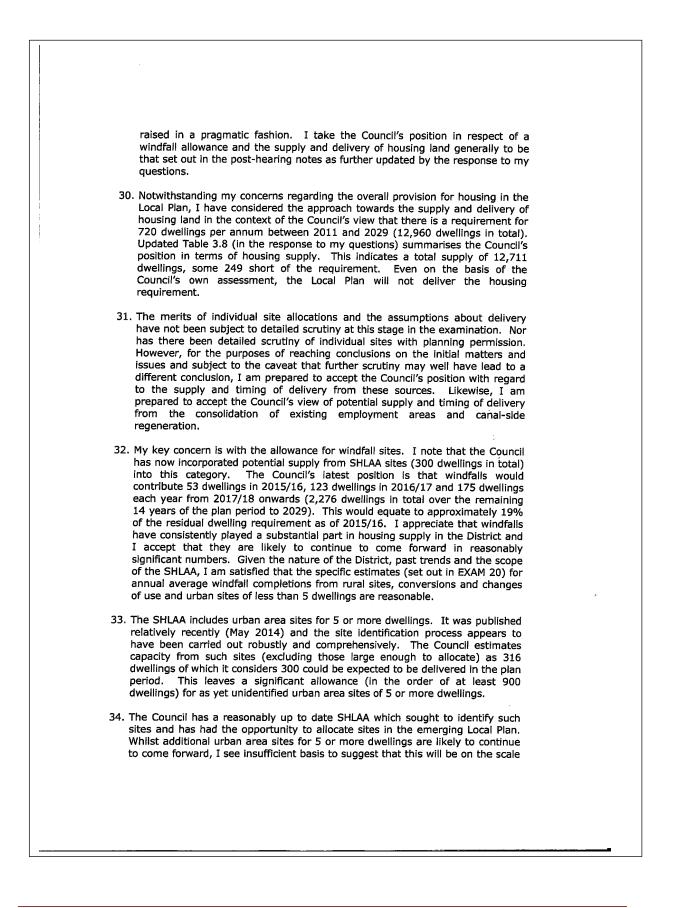
Dave Barber Planning Policy Manager Warwick District Council	Our Ref:	PINS/T3725/429
	Date:	1 June 2015
Dear Mr Barber, Examination of the Warwick	District Local Plan:	
Inspector's findings regardin 1. Further to the initial hearing	-	
2015, I set out below my fin 1), soundness in terms of ove terms of the supply and deliv consequences for the examina-	dings in respect of the erall housing provision (very of housing land (M	duty to co-operate (Matt Matter 2) and soundness
Duty to co-operate		,
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 I am satisfied that the Council the HMA and beyond throug overall housing provision. The constructive and the exter effectiveness of the preparation 	ghout the plan prepar ne key question is whe nt to which co-opera	ation process in terms of the terms of terms
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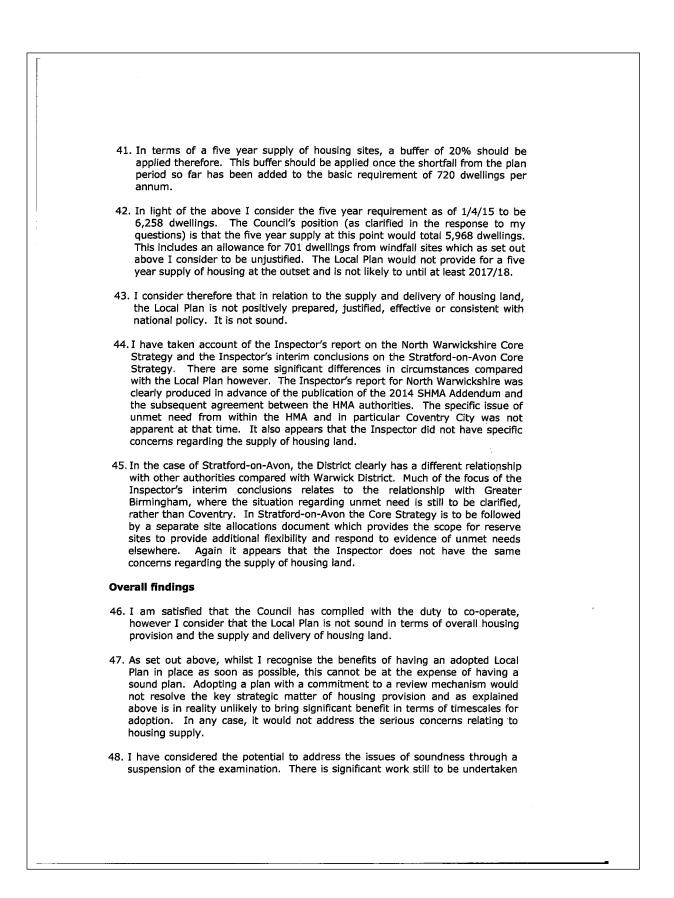
9	Soundness – overall housing provision
:	11. I am satisfied that the 2014 SHMA Addendum, when read alongside the 2013 SHMA, provides a robust assessment of OAN for the HMA. It is based on the most up to date national projections available at the time and in my view uses reasonable assumptions to arrive at a demographically led figure of 4,004 dwellings per annum between 2011 and 2031.
:	12. Whilst the 2014 SHMA Addendum does not include a specific uplift for market signals, affordability or economic growth, it recognises the case that higher household formation rates for younger households and higher jobs growth would indicate a higher figure. It makes it very clear that the figure of 4,004 dwellings per annum should be regarded as a minimum.
1	13. The 2012-based household projections published in February 2015 indicate the need for 4,100 dwellings per annum across the HMA between 2011 and 2031 (taking account of allowances for vacancy rates). These are the most up to date projections currently available and give further weight to the findings of the 2014 SHMA Addendum, although again they would suggest that the figure of 4,004 dwellings per annum should very much be seen as a minimum.
1	4. Although the 2014 SHMA Addendum sets out figures for each authority, it regards these as indicative given the sensitivity to variable migration levels. It also recommends further work by individual authorities in terms of economic growth prospects.
1	5. The HMA authorities confirmed at the initial hearing sessions that they regard 4,004 dwellings per annum as the minimum figure for OAN in the HMA. On the basis of the evidence before me, I share that view.
1	6. Other than Stratford-on-Avon District Council, the authorities in the HMA confirmed that they consider the individual authority figures in the 2014 SHMA Addendum as a reasonable basis for OAN in their areas. Stratford-on-Avon District Council considered it to be higher (at least 565 dwellings per annum compared to 508 per annum in the SHMA Addendum) and were undertaking further work in the light of the interim conclusions of the Inspector carrying out the examination of their Core Strategy. It is unclear at this stage to what extent any increase in the figures for individual authorities should be absorbed within the overall HMA total or added to it.
1	 The figures from the 2012-based household projections for individual authorities are broadly comparable with the figures from the 2014 SHMA Addendum although it is notable that the figure for Coventry City is 144 dwellings per annum higher.
1	8. It may be that some of the authorities in the HMA could be asked to accommodate unmet needs from the Greater Birmingham area in due course. If this was the case it is likely to require a further re-assessment of the distribution and overall level of housing provision in the HMA. Whilst the situation in this respect is not yet clear, it seems to me likely that if anything, there would be further upward pressure on the figures for the HMA and individual authorities.



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	anticipated with any degree of certainty. Previously (see H005 and the Council's written statement for the hearing session) the Council had not included an allowance for completions from urban area sites for 5 or more dwellings up to 2019, in recognition of the overlap with specific sites identified in the SHLAA. Whilst this category has now been merged in the Council's latest assessment, I see no basis for including an allowance for unidentified urban area sites for 5 or more dwellings in addition to specific SHLAA sites in this period.
35.	I note that you accept that the Council's trajectory set out in EXAM 20 included double counting with the anticipated completions in 2015/16 and 2016/17 from sites already with planning permission.
36.	In the terms set out in Paragraph 48 of the NPPF, I do not consider that there is compelling evidence that windfall sites will continue to provide a reliable source of supply on the scale envisaged. I find therefore that the overall windfall allowance is not justified or realistic.
37.	Solely on the basis of the Council's own estimates there would be a shortfall in provision of some 249 dwellings over the plan period compared to the requirement. Even this relies on a windfall allowance which I consider to be unjustified. It also provides no flexibility should site allocations not come forward as expected. I consider that the supply of housing land for the plan period as a whole would fall short of that necessary to meet requirements and provide even a modest level of flexibility by several hundred dwellings.
38.	Actual completions since 2011 have totalled 1,180 dwellings (up to 28/2/15). I accept that an allowance can reasonably be made for the net effect of additional care home bedspaces and that on this basis completions since 2011 can be regarded as 1,265 dwellings. Compared with an annual requirement of 720, there has been a shortfall in delivery of 1,615 dwellings in the first four years of the plan period.
39.	I accept that previous constraint policies (applied between 2005 and 2009) and wider economic conditions from 2007 onwards are likely to have had an effect on the level of housing completions in the District. I also acknowledge that completions each year between 2001 and 2006 exceeded regional strategy requirements, although this was clearly in the context of more buoyant economic circumstances.
40.	However, completions in each of the first four years of the plan period since 2011 have been very significantly below the annual requirement. As noted above, giving a shortfall of 1,615 dwellings already. There has been under delivery in each of the last six years and in seven out of the last ten years. Since 2005 there has been an overall shortfall of some 1,700 dwellings. Despite higher levels of completions between 2001 and 2006, there has been an overall shortfall of approximately 500 dwellings between 2001 and 2015. Warwick District had a separate housing target from Coventry City during this period and it is this against which performance should be judged. On the basis of the above I consider that there has been persistent under delivery of housing.



jointly with the other HMA authorities in terms of assessing the capacity to accommodate housing, Green Belt, and agreeing a distribution of the OAN for the HMA in full. The timetable for this would put it well beyond a reasonable period of suspension. It may also result in a significantly different approach to accommodating housing development in Warwick District. In order to address the serious issues with housing supply both for a five year period and the plan period as a whole, additional housing land on a significant scale would need to be identified. This is likely to take considerable time given that options would
need to be properly considered and assessed. It is also likely to require a review of the spatial strategy and potentially the approach to the Green Belt. The Council acknowledges this in EXAM 20 in respect of the implications of seeking to identify broad locations for growth or significant additional site allocations.
49. Taking all of these factors into account, I do not consider that a suspension of the examination is appropriate in this case, it would take too long, is likely to result in a plan substantially different from that submitted and in any event is unlikely to facilitate the adoption of a sound local plan in a timetable that is significantly shorter than the other options open to the Council.
50. Under the circumstances my advice to the Council is that there are realistically only two options. Firstly the Council could choose to receive my formal report. Given my findings, I will only be able to recommend non-adoption of the Local Plan. Alternatively the Council may choose to withdraw the Plan under S22 of the Planning and Compulsory Purchase Act 2004 (as amended).
51. I appreciate that you will be disappointed by my findings and will need time to consider them. However, I would be grateful if you could confirm the Council's position via the Programme Officer as soon as possible. A copy of this letter should be placed on the Council's website and made available on request.
Yours sincerely
Kevin Ward INSPECTOR
,