

Wantage and Grove Campaign Group



Vale of White Horse Local Plan Examination

Matter 11 – Five Year Supply of Housing Land

Submission from the Wantage and Grove Campaign Group.

11.1 Can a five year supply of deliverable housing land (in accordance with NPPF para 47) be currently identified against the plan's stated housing requirement?

11.2 Is it realistic that a five year supply of deliverable housing land would be maintained throughout the plan period?

1. We refer the inspector to the submission made on 19/12/14 by the Wantage and Grove Campaign Group (copy attached as Appendix 1).
2. This submission is based on completion figures obtained from ONS Live Table 253 (Housing building) – see Appendix 2. It demonstrates that in 2014-15 a total of 440 homes were completed in the Vale. The average number completed in a year since 2005 is 439. The most completed in a year was 810 in 2009-10.
3. The evidence provided by the District Council is contained in *HOU03 Meeting Objectively Assessed Need for Housing*. This document states:
"The rate of housing delivery is not something that the Council can control. Whether there is an adequate land supply is within the Council's sphere of influence, however there are many other factors. These include:
 - *The availability of development finance*
 - *Numbers of active developers and housebuilders*
 - *The speed of planning and mobilisation*
 - *The land supply*
 - *Availability of Mortgage Finance"*
4. In paragraph 44 the paper concludes:
..In the short term the Council can have a degree of confidence over the consented sites coming forward, but even for that development to be built out will require a doubling of current construction rates. To increase further will certainly be challenging and if the capacity within the construction sector does not increase it would not be possible to deliver all the planned housing."
5. The delivery of a five year supply of housing land can only be achieved if:
 - Sufficient construction workers and materials can be found when similar targets are being imposed all around the country,
 - Sufficient employment opportunities are forthcoming to provide the demand,
 - Sufficient key infrastructure (schools, medical facilities, leisure facilities, public transport etc.) can be provided in a timely manner to make the new dwellings attractive to buyers,
 - Sufficient profits are generated for developers to encourage them to continue building at this rate, and
 - Incomes are sufficient to make the dwellings affordable.
6. The Communities and Local Government "Glasgow" Report demonstrated clearly that developers were slowing down build-rates to maintain margins and obtain more planning permissions [CLG Housing Markets and Planning Analysis Expert Panel, "Factors Affecting

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Housing Build-out Rates" A report by Professor David Adams and Dr Chris Leishman 2008
http://www.gla.ac.uk/media/media_302200_en.pdf].

7. Evidence in the Vale of the White Horse is in line with these findings as building rates are not increasing over time even when approvals have been granted for large numbers of homes across the District.
8. There are many statistics in the public domain at the moment which demonstrate that house prices in Oxfordshire are still increasing. Properties in the Vale are being purchased by London commuters not those working in the scientific community in the Vale. Take the article in the Oxford Mail on 19 December 2015:
http://www.oxfordmail.co.uk/news/14155804.Two_Oxfordshire_towns_highlighted_as_top_housing_hotspots_for_commuters/
"TWO Oxfordshire towns have been highlighted by estate agents as new housing hotspots for London commuters, and they predict property prices in both will rise.
Online estate agency eMoov identifies Bicester and Didcot as two areas in the county where property is in high demand, but prices are still affordable.
The town centre redevelopment, new rail links to Oxford and London via Bicester Village Station, and planned improvements as part of the East West rail project, which will link Bicester with Milton Keynes and Bedford, along with new housing had attracted buyers to Bicester, it said.
A survey showed the average house price in the town was £312,460 and the value of residential properties had increased by £12,000 in the past six months.
In Didcot, the firm's research showed houses had increased by £18,000 in the last year, while the average house price was £293,625."
9. Given that 5% of all the Objectively Assessed Need (ONS) for housing in Oxfordshire is planned and (mainly) approved in Wantage and Grove (5,000+ out of the 93,560 to 106,560 new homes by 2031). These have to be built within 15 years. This assumes a local build-out rate of over 300 homes a year within an area of 9 km².
10. If the housing market remains consistent with new homes being less than 10% of the market then 3,000 homes will change hands in this area within this time frame. Given that at the 2011 census there were less than 8,000 dwellings in Wantage and Grove, this suggests a very high turnover rate for an area when a large proportion of the population have lived in the same properties for more than 30 years.
11. All of these statistics show that the overall housing targets and five year supply of deliverable housing land is simply not realistic.
12. Two years ago when the Vale first launched its Local Plan, we pointed out that 5,500 homes in Wantage and Grove when the work is in Harwell, Milton Park, Culham, Oxford and London means 9,314 new jobs and 6,986 more people driving to work or a station. If we want to move them onto public transport then assuming that there are roughly 30 people on each bus we need 233 buses in each direction. We were told at the time "not to be silly, obviously this wasn't going to happen".
13. We could quote the same phrase back to the Council when discussing the deliverable housing targets. It is not realistic that a five year supply of deliverable housing land would be maintained throughout the plan period.

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Appendix 1

Part B – Please use a separate sheet for each representation

Name or Organisation : Wantage and Grove Campaign Group

3. To which part of the Local Plan does this representation relate?

Paragraph 4.10. Policy Core Policy 4: Meeting Our Housing Needs

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> X
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
<i>Please mark as appropriate.</i>				

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Plan aims to meet the housing need outlined in the SHMA even though the SHMA states that

"1.9 The SHMA does not set housing targets in itself. It provides an assessment of the future need for housing based on facts and unbiased evidence.

1.10 Government guidance and advice is explicit that the SHMA itself must not apply constraints to the overall assessment of need, such as environmental constraints or issues related to congestion and local infrastructure. This does not mean that these issues are not important. They are very relevant issues in considering how much development can be sustainably accommodated and where new development should be located."

The presumption in favour of sustainable development within the NPPF (para 15) sets out that plans should be based on meeting the need identified in full, *where it is sustainable to do so*.

The graph on the following page shows the number of homes completed by year. The data sources are –

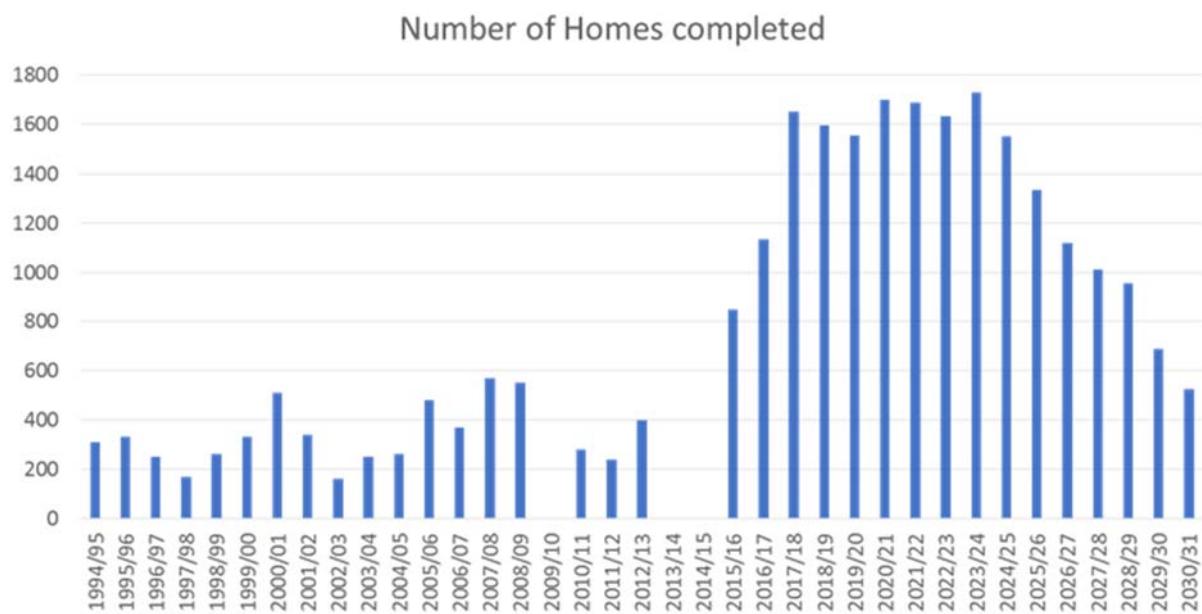
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1994-2014 government statistics (ONS), 2015-2031 "Meeting the 'objectively assessed need' for Housing" VOWHDC. This shows that the maximum number of homes built in any year since 1993 in the Vale of the White Horse was 570 in 2007/8. Yet the documents supporting the Local Plan propose that 1,650 homes can be completed in 2017/8.

The feasibility of trebling the maximum build rate achieved in the last 20 years and maintaining this rate for the next eight years is untested. To assume that that, even if it can be achieved at all, this can be achieved sustainably without contributing to increasing congestion and capacity problems in local infrastructure in the short to medium term is worthy of Lewis Carroll (a local author). This is not sustainable and will place an undue burden on the existing local infrastructure in the Vale (already at breaking point in many areas).

Planners must recognise that people will not buy homes if no school places are available, road congestion is at or exceeds capacity, medical facilities are full and leisure facilities are operating above capacity. Build rates are dependent on sales and if sales are not achieved the plan will not be achieved leaving the five year land supply in tatters.

Evidence from Great Western Park on the eastern edge of the Vale in a recent report by the BBC <http://www.bbc.co.uk/news/uk-england-oxfordshire-30374134> suggests that the first residents moved into Great Western Park, Didcot in 2011, but a planned shop is lying empty and a bus shelter is yet to be built. A new primary school, due to open in 2015, has also been delayed by a year.



6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Build rates should be realistic and the plan should include an infrastructure delivery plan that means that road improvements, schools, improvements to medical facilities and leisure facilities should be provided in line with development not (as proposed) in following years when or if funding from developers becomes available.

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Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To answer any questions that the Inspector may have about the statistics provided and the current state of infrastructure in the Vale

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

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Appendix 2: ONS Live tables on House Building

	Lower and Single Tier Authority Data	Dwellings started				Dwellings completed			
		Private Enterprise	Housing Associations	Local Authority	All	Private Enterprise	Housing Associations	Local Authority	All
1995/96	Vale of White Horse	150	50	0	200	320	0	10	330
1996/97	Vale of White Horse	160	10	0	170	190	70	0	250
1997/98	Vale of White Horse	390	50	0	450	130	40	0	170
1998/99	Vale of White Horse	400	20	0	420	210	50	0	260
1999/00	Vale of White Horse	300	30	0	330	290	40	0	330
2000/01	Vale of White Horse	350	50	0	390	450	60	0	510
2001/02	Vale of White Horse	320	40	0	360	310	30	0	340
2002/03	Vale of White Horse	240	40	0	280	150	20	0	160
2003/04	Vale of White Horse	300	20	0	320	200	50	0	250
2004/05	Vale of White Horse	350	60	0	410	240	20	0	260
2005/06	Vale of White Horse	400	70	0	470	390	90	0	480
2006/07	Vale of White Horse	370	60	0	430	350	30	0	370
2007/08	Vale of White Horse	450	40	0	480	470	100	0	570
2008/09	Vale of White Horse	280	80	0	360	540	10	0	550
2009/10	Vale of White Horse	790	810	810
2010/11	Vale of White Horse	180	50	0	230	230	50	0	280
2011/12	Vale of White Horse	240	140	10	390	150	60	40	240
2012/13	Vale of White Horse	240	50	0	290	270	130	0	400
2013/14	Vale of White Horse	370	180	0	550	360	150	0	510
2014/15	Vale of White Horse	510	240	0	750	270	170	0	440

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building> Table 253 extracted 21/12/2015

Average per annum 1995 -2015	340	64	1	404	317	31	3	350
Average per annum 2005 -2015	383	91	1	474	384	51	4	439
Average per annum 2010 -2015	308	132	2	442	256	102	8	366