

### Matter 6: South East Vale

We do not specifically have any comments in relation to Questions 6.1 to 6.6.

However, as outlined in our response to Matter 3, we are concerned that the quantum of development proposed in both the LPP1 and LPP2 will not deliver over the Plan period. This is both as a result of unrealistic assumptions regarding delivery and the narrow market in which a significant quantum of development will be provided in. Our concerns relating to these matters particularly focus on the South Eastern Vale. Our detailed concerns are outlined below.

**Housing Delivery:** As outlined in our response to Matter 3, we have concerns relating to the Council's housing supply delivery assumptions.

These concerns are most notable in the South East sub-region, where there is a significant quantum of development expected in a narrow geographic area. Our concerns increase when considering the proposals within the emerging South Oxfordshire Local Plan, which provide a significant quantum of development immediately adjacent to the South East sub-area. This is discussed in more detail below.

We are concerned that without a reconsideration, the Plan will not deliver the housing needed to meet the Vale's overall housing need, including its apportionment from Oxford City. It will therefore not be positively prepared, justified, effective or consistent with national planning policy. Consequently, the Plan will be an unsound proposition.

As outlined in our response to Matter 3, recent research indicates that large sites take on average 6.6 years provide first legal completions<sup>1</sup>. Further research<sup>2</sup> indicates that:

***"...in combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years."***

The above analysis would not include the preparation of Supplementary Planning Guidance, which is required on some LPP2 sites, including those within the South Eastern sub-area.

It appears from the supporting evidence (the Housing Trajectory Topic Paper) that unrealistic lead-in times are being proposed by the Council. More realistic lead-in assumptions based on the analysis provided above, should be used.

Moreover, we also have concerns with the anticipated build rates employed by the Local Planning Authority.

Recent research indicates<sup>3</sup> that on average:

1. Sites of less than 100 units will deliver 27 dwellings per annum;
2. Site of up to 1,499 units will 'barely exceed' 100 units per annum and none of the sites considered in the research achieved a rate of 200 dwellings per annum;
3. Sites with a capacity for 2000 units will deliver at an average rate of 161 dwellings per annum.

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<sup>1</sup> Page 5, [https://cweconomics.co.uk/wp-content/uploads/2017/10/CWEconomicsReport\\_Land\\_Banking.pdf](https://cweconomics.co.uk/wp-content/uploads/2017/10/CWEconomicsReport_Land_Banking.pdf)

<sup>2</sup> Page 8, <https://lichfields.uk/media/1728/start-to-finish.pdf>

<sup>3</sup> Page 14, <https://lichfields.uk/media/1728/start-to-finish.pdf>

The Council's trajectory employs considerable higher rates of delivery. Whilst in certain areas it may be possible to argue for higher delivery rates, for the reasons outlined in the 'narrow market in the South East Vale' section of this participation statement, we consider that it would not be a robust position to adopt in the South East Vale, which when considered alongside proposals in South Oxfordshire, places a significant quantum of development in a very narrow market.

Using the more realistic assumptions presented above would ensure that the housing trajectory was **deliverable** and therefore **effective**.

This will of course mean that a proportion of the Council's identified supply, will fall outside the Plan period. It will therefore be necessary to remedy this shortfall through the allocation of additional or alternative housing sites.

Given the concerns relating to the deliverability and sustainability credentials of the new spatial strategy and the distribution of development proposed in the LPP2, it is considered necessary to revert back to the sound and robust position contained within the LPP1. This would require the Vale's housing needs, together with its apportionment of Oxford City's unmet housing needs, to be distributed in accordance with the LPP1 spatial strategy and distribution of development, in full.

**Narrow Market in the South East Vale:** During the preparation of the LPP1, objectors raised concerns that whilst the level of housing proposed was distributed in line with the spatial strategy, it would, by virtue of its limited geography, not deliver in the manner envisaged. These concerns principally related to the South Eastern sub-area, where the majority of housing need is to be met.

Whilst the Inspector did not agree with these objections at that point in time, the additional housing allocations proposed in the sub-area adds further validity to them, with a further 1,400 dwellings to be accommodated from just two sites.

This places a significant quantum of development, some 13,362 dwellings, in this narrow area. Alone, the South East sub-area needs to deliver an additional 11,829 dwellings over the remaining 14 monitoring years of the Plan. This equates to a rate of development of some 844 dwellings per annum over this timeframe, when the area has to date only delivered an average of 256 dwellings per annum since 2011. This is also a higher annual rate of development to that delivered across the whole District in the period 2011-2015. Additional growth adjacent to the sub-area, but within South Oxfordshire is also planned within their emerging Local Plan Final Publication Version – some 6,500 units in Didcot alone (October 2017). We question whether this rate of development can be accommodated within this small housing sub-market, over the plan period.

There are already strong indications that the South Eastern sub-area cannot accommodate this level of planned growth. Most notably, the Appeal at Mather House and Greensands, White Road and Reading Road, Wantage (Appeal Ref: APP/V3120/W/16/3145234), where the Inspector concludes that the Council was already unable to demonstrate a 5-year supply of housing from within the 'ring-fenced' area of the District, which is located within the South Eastern sub-area.

We are also aware that a national house builder has already raised concerns with the Council's delivery assumptions concerning their site at the Grove Airfield, which was allocated in the LPP1 (the developer has indicated that 846 dwellings of the 2,500 dwelling allocation will be delivered outside the Plan period).

The pursuit of a strategy which focuses increasing amounts of development within the South East sub-area, which has been accentuated by the LPP2, both in terms the proportion of housing relative to the overall requirement for the Authority and the number of housing proposed, risks the delivery

of the overall housing need and demand for the Vale and the unmet need from neighbouring authorities. In such a circumstance, it is likely that the housing land supply will reduce to below 5-years once again, which will encourage speculative planning applications on sites not allocated in the LPP1 or 2.

In our view, it is essential that a realistic geographic strategy is adopted, which reinstates the distribution of housing to the Western Vale and considers its role in accommodating Oxford's unmet housing need in line with the spatial strategy defined by the LPP1. The role envisaged for it in the LPP1 needs to be reflected in proportionate terms in the LPP2. The delivery of the overall housing need must be afforded more importance than the pursuit of a strategy which is contrary to the adopted Development Plan, which is by definition the most appropriate strategy when considered against reasonable alternatives and which in all likelihood, is likely to fail in any event.

*LRM Planning*  
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