

VALE OF WHITE HORSE LOCAL PLAN EXAMINATION PART 2.

SUBMISSION BY EAST HENDRED PARISH COUNCIL

ON THE COUNCIL'S HOUSING LAND SUPPLY UPDATES March-August 2018.

MATTER 8, HOUSING LAND SUPPLY & RING FENCE AREA.

(2ND CORRECTION TO ROW K OF TABLE 1, 5th Sept 2018).

POINT 1. THE EXCEPTIONAL BOOST TO HOUSING DELIVERY.

1. East Hendred Parish Council wishes to respond to the District Council's Updates on the 5 year land supply dated 27th March 2018 (PC01.1), 3rd July 2018 (HEAR03.1) and 22nd August 2018, circulated by the Programme Officer on 30th August 2018.
2. Documents PC01.1, HEAR03.1, & the 22nd August 2018 Note, give the Vale's response to the Inspector's Preliminary Questions on Housing Delivery. They show the *exceptional boost to housing delivery* just 18 months after the adoption of the Local Plan in Dec 2016. Housing delivery therefore complies with the new NPPF paragraph 59.
3. This demonstrates that the aspirational Strategic Policies in LPP1 are being delivered, and hence LPP1 is "sound." This suggests that there are unlikely to be exceptional circumstances, which require a large-scale increase in housing land supply in the AONB at Harwell Campus in LPP2, because the LPP1 is "sound."
4. See Appendix A for justification for exceptional boost to housing delivery.

POINT 2. THE INCREASED 5 YEAR LAND SUPPLY BY NOVEMBER 2018.

5. By November 2018, it would therefore be unreasonable for the District Council to continue to rely on the 20% buffer, in the Ring Fence area, in the superseded NPPF in assessing whether Local Plan policies are up-to-date in planning applications. Paragraphs 212-213 of the July 2018 NPPF gives limited weight to superseded guidance that does not conform to the latest NPPF.
6. Paragraph 11 Footnote 7 of the new NPPF introduces a new Housing Delivery Test, which limits the assessment of historic under-delivery of housing to the previous 3 years, instead of the start of the Plan period.
7. Paragraph 73c) Footnote 39 suggests a 20% buffer should only be applied where housing completions are below 85% of the housing requirement.

8. Paragraph 216 says that, from November 2018, a substantial under-delivery would require delivery to be below 25% of the housing required over the previous 3 years. The implications of this new guidance is that, by November 2018, there would be no substantial under-delivery in the Ring Fence area, and the Local Plan policies can be assessed as “up-to-date,” as shown below:

Table 1: 5 Year Housing Requirement (2018/19-2022/23).

	Ring Fence	Rest of District	District Total
A. Housing Requirement	11,850	10,910	22,760
B. Annual requirement	593	545	1,138
C. Last 3 year requirement	1,779	1,635	3,414
D. Last 3 year completions	1,739	2,629	4,368
E. Under/over supply 2015-18	-40	+992	+952
(With no substantial under-delivery, a 10% buffer is suggested in the new NPPF Paragraph 73, for both the Ring Fence & Rest of District areas).			
F. Completions to 2017/18	2,276	4,024	6,300
G. To be completed in 13 yrs	9,574	6,886	16,460
(Row A. minus row F.)			
H. 5 year land requirement	4,419	3,054	7,473
	3,682	2,725	6,407
(G./13 years x 5 years for Ring Fence & B.x 5 years for Rest of District).			
I. Incl. 10% buffer (H +10%)	4,050	2,998	7,048
J. Housing supply (22 nd Aug)	4,941	4,650	9,591
(LPP2 allocations – 250 dwellings in Ring Fence, 220 in Rest of District).			
K. No. of years supply (I./B.)	5.6 6.1	7.6 7.8	6.4 6.8
L. Surplus housing supply	+891	+1,652	+2,543

Sources: The Vale’s Housing Land Supply Notes of April, March, July & Aug 2018.

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9. I note the following extract from the LPP1 Inspector's Report, quoted in the Council's Housing Land Supply Report April 2018.

'Nonetheless, the robustness of the district's housing supply position is demonstrated by the fact that, even if implementation of all of the plan's housing allocation sites were to be delayed by a year beyond the Council's forecasts a supply of deliverable housing land exceeding six years would still exist.'

CONCLUSIONS OF POINTS 1 & 2.

10. It is concluded that:

- i) as an exceptional boost to housing supply has been delivered in LPP1 since its adoption in December 2016, and
- ii) a increase in the flexible & robust housing land supply would be provided by November 2018, (both throughout the Plan Period and in the 5 year land supply),
- iii) that there are no exceptional circumstances for large scale development in the AONB at Harwell Campus.

APPENDIX A:

JUSTIFICATION FOR EXCEPTIONAL BOOST IN HOUSING DELIVERY.

1. The average annual housing delivery 2011/12-2015/16 has risen from 3,065 dwellings (603 dwellings per year), to 1618 dwellings per year (2016/17-2017/18), after the Plan's adoption. For the Ring Fence area, a similar increase has occurred, with 1,011 dwellings delivered 2011/12-2015/15 (202 dwellings per year), rising to 1,265 dwellings 2016/17-2017/18, (632 dwellings per year), Vale Housing Land Supply, April 2018.
2. The Inspector noted "the impressive increase in permissions" in the 3rd July 2018 Note (HEAR03.1). These increased District-wide from 3,061 to 13,387 dwellings, and from 887 to 8,580 dwellings in South East Vale (& the Ring Fence area). Thus only 2,252 dwellings of the 12,495 total dwellings allocated in LPP1, (18%), do not have a permission.
3. The District housing land supply has a 16% surplus above the requirement, (a supply of 26359 dwellings compared to a 22,760 dwelling requirement), & a 17% surplus in S.E. Vale (the Ring Fence area).

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