



## **Gladman Developments Ltd**

### **Vale of White Horse Local Plan 2031 Part 2**

#### **Examination Stage 1: Hearing Sessions**

#### **Matter 3: Overall housing provision in the plan and its distribution between sub-areas**

##### **Questions:**

**1.1 Is the proposal in the LPP2 to allocate 1,400 additional homes in the South East Vale Sub Area to support economic growth of the Science Vale consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?**

1.1.1 Gladman has comments to make on this question.

**1.2 Is the proposal in the LPP2 not to allocate additional sites in the Western Vale Sub Area consistent with the strategy in the LPP1 and supported by proportionate evidence?**

1.2.1 The Part 1 Local Plan identifies a housing requirement of 3,173 dwellings for the Western Vale Sub-Area. This was in excess of the level of housing required to meet the housing needs of the sub area. The overall strategy and the distribution of housing between the various sub-areas was found to be sound by the Part I Local Plan Inspector. In particular, in paragraph 57 of the Inspector's report he noted that *"Conversely it has been argued that it does not make sense to allocate 13% of housing in the west of the Vale, distant from the new employment opportunities. However, this is a relatively small proportion of all housing, and will (in line with the guidance in the NPPF) support the main settlements in this area – the market town of Faringdon and the two larger villages)."*

1.2.2 Also, in paragraphs 136 to 142 of his report, the Inspector concludes that the level of housing provision proposed for the Western Vale sub-area, including the housing allocations at Faringdon, Shrivenham and Stanford in the Vale, represents a sound approach.

- 1.2.3 The proposed embargo on further housing growth for the Western Vale in the Part 2 Plan appears therefore illogical and unsupported by evidence. There are no reasons put forward to explain why the Western Vale should not make a contribution to the housing requirement for the Part 2 Local Plan including the unmet needs of Oxford City.
- 1.2.4 In effect the Part 2 Plan proposes that a number of sites in the Abingdon and Oxford Fringe Sub-Area will now be used to accommodate the unmet needs of Oxford City as opposed to the Vale's own housing needs. As a consequence the housing requirement for the South Eastern Vale is significantly increased in terms of meeting the Vale's housing need. The deliverability of the increased housing provision for the South Eastern Vale over the plan period is a matter of some concern. Gladman contends that additional housing allocations should be made in the Western Vale Sub Area to provide a sensible level of flexibility in the likely circumstances of delays in allocated sites in the South Eastern Vale and the Abingdon Oxford Fringe sub areas coming forward.

**1.3 Taking the objectively assessed housing needs of the Vale and the unmet needs of Oxford together, is the overall housing provision in the LPP2, its distribution between sub-areas and its various components, consistent with the strategy in the LPP1, supported by proportionate evidence and deliverable?**

- 1.3.1 No. Gladman considers that additional allocations for housing development are required to provide flexibility and contingency in the likely event that allocated sites do not deliver as expected. There is no justification for effectively reducing the role that the Western Vale plays in the delivery of new housing to meet needs during the plan period.
- 1.3.2 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.
- 1.3.3 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.
- 1.3.4 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.

## **1.4 How would the overall provision of housing in the district be monitored to ensure delivery? Is the housing supply ring fence for the Science Vale area still relevant and necessary?**

- 1.4.1 Gladman considers that the ring fence policy is not justified. Whilst the overall objective of providing housing in close proximity to where jobs are to be created is a legitimate aim and is supported as a spatial strategy in the plan, the application of a ring fence is not necessary to achieve this.
- 1.4.2 The overriding purpose of the Local Plan, in terms of housing supply, should be to meet the full objectively assessed need for market and affordable housing in the housing market area as set out in para 47 of NPPF. The Oxfordshire SHMA clearly identifies Oxfordshire as a distinct housing market area and there is no evidence in the SHMA that the ring fence area constitutes a discrete or recognisable housing market area.
- 1.4.3 The operation of the ring fence policy is likely to lead to a situation where a five year supply of housing land in the ring fence will not be able to be identified and the needs of the housing market area will not be met. This situation was considered by the Inspector in the Thames Farm, Shiplake appeal<sup>1</sup> who concluded that, in the absence of a five year supply of housing in the ring fence area, the aspiration for the comprehensive transformation of Didcot was “outweighed by the need set out in the Framework to ensure choice and competition in the market for land and thereby boost significantly the supply of housing to meet the needs of present and future generations.”
- 1.4.4 Gladman contends therefore that the ring fence policy represents a strategy that will not meet the housing needs of the housing market area

## **1.5 Does the LPP2 provide for the housing needs of Gypsies, Travellers and Travelling Show People as envisaged by, or in a manner consistent with, Policy CP27 of the LPP1?**

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

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<sup>1</sup> Paragraph 20 Appendix 1