
Examination into the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites

Written Statement on behalf of The University of Oxford (ID 902666)

Hearing Statement: Matter 8

June 2018

**Examination into the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies
and Additional Sites**

Written Statement on behalf of the University of Oxford

Hearing Matter 2: Unmet Housing Needs from Oxford

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1.0 INTRODUCTION

- 1.1 This statement is submitted to the Examination into the Vale of White Horse District Local Plan 2031: Part 2 on behalf of the University of Oxford (hereafter referred to as 'the University').
- 1.2 This statement responds to questions 8.3 and 8.4 posed under 'Matter 8: Housing Land Supply, Viability, Delivery and Monitoring', identified by the Inspector in his List of Matters and Questions.

2.0 MATTER 8 - HOUSING LAND SUPPLY, VIABILITY, DELIVERY AND MONITORING

Question 8.3

Are the figures for completions and known commitments (both overall and in each sub-area) accurate? Should any allowance be made for the non-implementation of commitments?

- 2.1 Although the LPP2 refers to a known commitments figure of 3,601 dwellings, we consider that is not clear within the evidence base as to the makeup of this figure. We acknowledge that the Council's Housing Land Supply Statement (April 2018) details those sites which form large site commitments, however it is not clear as to the make-up of medium (sites 10-49 dwellings) and small site (1-9 dwellings) commitments. In addition, although we understand the Council applies a 10% non-implementation rate to small sites (1- 9 dwellings), the evidence is not clear as to whether a discount is applied to medium and large scale sites.
- 2.2 We therefore consider that the district should have a fall-back position to include further or 'reserve' small scale allocations to ensure that they are able to meet the required growth within the Plan period to cover the non-implementation of medium and large scale commitments. This will ensure that the Council are able to bring forward such sites if it becomes evident that the know commitments are not delivering the numbers that consist of the 3,061 dwellings indicated at Core Policy 4a of the LPP2 Publication Version, October 2017 (Ref: CSD01).
- 2.3 In addition small scale allocations can generally be brought forward at a quicker rate, with on-site completions soon after commencement. This will allow the Council to react swiftly to cover any non-implementation of commitments.
- 2.4 Further or 'reserve' small scale allocations would also be appropriate as we are concerned that the Dalton Barracks site will not deliver 1,200 dwellings (see our response to Matter 2, Question 2.6).

Question 8.4

Is the revised calculation for windfall sites in the LPP2 (both overall and in each subarea) compared to the LPP1 supported by proportionate evidence and consistent with national policy?

- 2.5 As indicated within the table at Core Policy 4a of the LPP2 Publication Version, it is expected that in total 1,100 dwellings will come forward via windfalls within the Plan period. We note that this windfall allowance has been split between the sub-area within the district as follows:
- 308 dwellings within the Abingdon-on-Thames & Oxford Fringe Sub-Area
 - 484 dwellings within the South East Vale Sub-Area
 - 308 dwellings within the Western Vale Sub-Area
- 2.6 We note that within the LPP2 - Preferred Options document, March 2017 (Ref: LLP05) that the windfall allowance was 820 dwellings over the Plan period. Therefore, the windfalls allowance has risen by 260 dwellings over the Plan period since the last consulted version of the Plan. The LPP2 Publication Version confirms that the windfall figure of 1,100 dwellings has been updated to reflect past delivery.
- 2.7 On page 32 of the 'Topic Paper 2 - Site Selection', October 2017 (Ref: TOP02.1) document it states that the Council has reviewed the completions on small housing sites that have taken place between 2011/12 and 2016/17 and concludes that this demonstrates that small housing sites are a reliable source of supply in the district and therefore the Council has increased its windfall allowance from 70 dwellings a year to 100 dwellings a year.
- 2.8 We would like to emphasise that the NPPF states at paragraph 48:
- “Local planning authorities may make allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. An allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.” (our emphasis)**
- 2.9 Although we acknowledge that the Council has considered historic windfall delivery rates, we consider that the Council has failed to provide 'compelling evidence' for its windfalls allowance of 1,100 dwellings as required by national policy.

- 2.10 Firstly, as shown at Table 4.3 of the 'Topic Paper 2 - Site Selection' document, it is noted that for the year 2016/17 there were 448 completions on small housing sites. This figure is significantly greater than that the completion rates for any of the other years between 2011/12 – 2015/16. This is evident by the fact that the average completions per annum over the period 2011/12 – 2015/16 is 113 dwellings but by including the completions for 2016/17 would increase this average to 169 dwellings. We therefore consider that the completions figure for 2016/17 has skewed the historic windfall delivery rates to which the Council's windfall allowance is based upon.
- 2.11 Although we acknowledge the Councils' evidence base, we consider the Council has provided no justification within this Topic Paper, the subsequent Topic Paper 2 – Site Selection Addendum, February 2018 (TOP02.4) or within the Council's most recent Housing Land Supply Statement (April 2018) as to how these figures have been derived nor an explanation as to why the completion figure in 2016/17 is so high.
- 2.12 Secondly, although the Council has provided historic windfall delivery rates to justify its windfalls allowance, there is no reference to the Council's Housing Land Availability Assessment nor expected future trends therefore we do not consider that the Council has justified its windfall allowance in accordance with paragraph 48 of the NPPF. From what we understand, there also does not seem to be any clarity as to whether the windfall figure excludes residential gardens.
- 2.13 In addition to the above points, we find it surprising that the Council has put so much reliance on windfalls contributing to approximately 24% of the housing requirement within the LPP2 Publication Version when added to the Part 2 allocations figure of 3,420 dwellings. We also find it surprising that although the LPP2 Publication Version document allocates more sites within the Abingdon-on-Thames and Oxford Fringe Sub-Area rather than the South-East Vale Sub-Area, the windfall allowance is greater within the South-East Vale Sub-Area than the Abingdon-on-Thames and Oxford Fringe Sub-Area. In addition, 308 dwellings are expected to come forward as windfalls within the Western Vale Sub-Area which is the same windfall allowance figure for the Abingdon-on-Thames & Oxford Fringe Sub-Area, yet no allocations are proposed within the Western Vale Sub-Area within the LPP2 Publication Version. We cannot locate any evidence to suggest why the Council has taken this approach for the sub-areas.
- 2.14 We therefore consider that the windfall allowance has disproportionately been split between the sub-areas and does not reflect the location of allocations to come forward within the sub-areas.

2.15 The proportion of windfall development is therefore both inconsistent in its distribution with the spatial strategy and focus for development in the Abingdon-on-Thames & Oxford Fringe Sub-Area and moreover does not provide sufficient certainty of delivering a significant proportion of the Council's requirement for new homes. Therefore, The University considers the Plan is not flexible and has not demonstrated deliverability of this component of the housing land supply. On this basis, the LPP2 Publication Version cannot be considered sound as it does not have a justified strategy for delivering houses.

2.16 The University also notes that the text directly above the table at Core Policy 4a states:

“Additional dwellings (for example, windfalls) will be delivered through Neighbourhood Development Plans or through the Development Management Process.”

2.17 Although we note that several Neighbourhood Plans are still at a very early stage in preparation, we consider that there is an absence of evidence to suggest that those adopted Neighbourhood Plans, and any other plans in the pipeline, have an obligation to deliver housing sites to ensure that the windfall allowance can be met which forms a component of the housing requirement for the district. At the time of writing, only five Neighbourhood Plans have been adopted and out of those plans it is our understanding that only the Drayton Neighbourhood Plan is allocating sites for housing.

2.18 We note that the Topic Paper 2 – Site Selection Addendum, February 2018, states (paragraph 2.15) that the past delivery rate is sufficient to justify the windfall allowance, to which we have questioned above, without any sites coming forward through neighbourhood plans. In other words, the LPP2 recognises that sites may come forward through neighbourhood plans but does not rely on these sites coming forward to meet the districts housing needs.

2.19 Although we note this justification, if allocated sites fail to deliver the proposed amount of housing within the Plan period (for example the Dalton Barracks site as indicated in our response to Matter 2 - Question 2.6), the Council may need to rely on sites that are coming forward through Neighbourhood Plans. Yet without any obligation for Neighbourhood Plans to deliver housing sites, we consider the Council are not 'future proofing' against this risk.

2.20 If the Council is not willing to specify the locations for housing sites to be delivered through Neighbourhood Plans across the district, then we consider that the district should have a fall-back position to include further or 'reserve' small scale allocations to ensure that they are able to meet the required growth within the Plan period. The alternative option is to include a policy which clearly allocates housing via Neighbourhood Plans at settlements within the which states that if a Neighbourhood Plan does not allocate housing by a point in time then the strategic plan (Local Plan) will be reviewed to allocate housing.