

Vale of White Horse Local Plan 2031 (Part 1 Strategic Sites and Policies) Examination - Stage 2



Hearing Statement on Behalf of Redrow Homes South
Midlands Respondent 723103 - Matter 11

5 January 2016

Table of Contents

| | |
|---|----------|
| Matter 11 – Five Year Supply of Housing Land | 1 |
|---|----------|



Matter 11 – Five Year Supply of Housing Land

- 1.1 This Statement responds to the Stage 2 Matters and Questions as at 17 December 2015.
- 1.2 This Statement specifically deals with the five year supply of housing land being relevant to Strategic Site 5 East Sutton Courtenay.
- 1.3 Bidwells on behalf of Redrow Homes South Midlands made representations to the Publication Stage of the Local Plan in December 2014 and are participant at relevant Stage 2 Examination Hearings.
- 1.4 A Statement of Common Ground between Vale of White Horse District Council (the Council) and Redrow Homes South Midlands in respect of Site 5 was submitted in respect of Stage 1 of the Examination Hearings.
- 1.5 The Statement of Common Ground was signed by the Council dated 10 September 2015.
- 1.6 An outline planning application for up to 200 dwellings and associated development on part of the Site (reference: P15/V2353/O) was registered by the Council on 5 October 2015. This application remains under consideration by the Council.
- 1.7 It is acknowledged that Stage 2 of the Examination Hearings is not intended to examine the current planning application for part of the Site. However there are technical matters assessed through the current planning application which are relevant to the examination of the Local Plan during the Stage 2 hearings.



- 1.8 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?**
- 1.9 Currently the Council acknowledge that a five year supply of deliverable housing land cannot be identified, in accordance with NPPF Paragraph 47 against the stated housing requirement when the accumulated shortfall is taken into account.
- 1.10 We consider the Council will not be able to demonstrate a 5 year supply of land, unless the Local Plan is adopted as this contains the vision, strategy and a significant number of allocations for strategic sites.
- 1.11 The Vale of White Horse Local Plan Part 1 sets a housing requirement of 20,560 homes over the plan period; this is based on the Objectively Assessed Needs, set out within the Oxfordshire Strategic Housing Market Assessment (HOU01). The requirement equates to an average annual delivery rate of 1,028 dwellings per annum, before any shortfall is taken into account.
- 1.12 The OAN figure is considered by Redrow Homes South Midlands to be a robust assessment of the housing needs of the district, as explored during the Part I examinations.
- 1.13 The Housing Topic Paper (TOP04 Housing) sets out the trajectory of expected delivery of homes across the district, including a 'ring fence' for the Science Vale Area where the majority of new homes are planned. This Trajectory has been used as the basis of this response.
- 1.14 In the preceding years (2011-2014) there has been a significant under delivery against the OAN. The NPPG (Paragraph: 035 Reference ID: 3-035-20140306) states that the definition of persistent "may vary from place to place and, therefore, there can be no universally applicable test or definition of the term". RHSM note that TOP04 acknowledges this undersupply, both within the district and the wider Housing Market Area (HMA). RHSM agree that it is appropriate for a 20% buffer to be added to the housing requirement for the five-year period. RHSM note the wording of the NPPF, which requires the 'buffer' to be, "brought forward from later in the plan period". It is not, therefore, a buffer of 20% to be added to the total planned housing requirement from 2011-2031.
- 1.15 The five year requirement, excluding any shortfall for the five year period is calculated as 6,425 (1,285 p.a).
- 1.16 TOP04 identifies the current shortfall, as of 2015/16 as 2,031 dwellings; this figure includes a number of 'expected' completions. It then indicates a deliverable housing supply 2015-2020 of 8,047.



- 1.17 There are two methods that can be used to meet any shortfall. Sedgefield, which requires the shortfall to be made up over the 5-year period or, Liverpool which spreads the shortfall across the whole of the remaining plan period.
- 1.18 Based on the information set out within TOP04, adding a 20% buffer and taking into account the shortfall, we conclude the following.
- 1.19 For the Sedgefield methodology this equates to a housing requirement of 1,792 dwellings p.a, equating to a land supply of 4.4 years.
- 1.20 For the Liverpool methodology, this is an average of 1,411 dwellings p.a, inclusive of the 20% buffer (7,055 dwellings over 5 years) equating to 5.7 years.
- 1.21 The NPPG (Paragraph: 035 Reference ID: 3-035-20140306) states:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible".
- 1.22 It goes on to state:

"Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."
- 1.23 RHSM consider that in preparing the plan, the Council has discharged the Duty to Cooperate, providing mechanisms for plan reviews and preparing joint evidence (these matters were addressed in more detail during Part 1 of the hearings).
- 1.24 To meet the OAN figure, delivery of housing will need to be significantly increased. The Annual Monitoring Report 2010-11 sets out the historic delivery of housing. It reveals that from 1996-2011 delivery averaged 367 p.a. and from 2006-2010/11 this increased to 417. Therefore, whilst it is desirable for historic undersupply to be addressed, on balance, RHSM agree with the application of the Liverpool Methodology at this time and the following statement set out within TOP04:
- 1.25 The housing trajectory together with the evidence study "Meeting the 'Objectively Assessed Need' for housing" also demonstrates that the Council cannot fully make up its previous undersupply within the first five years of the plan because when a 20% supply buffer is included the sheer scale of frontloaded growth required to do so it is not realistically deliverable (taking into account the delivery implications of bringing forward multiple sites in close proximity are considered, i.e. market behaviour and competition)."
- 1.26 Footnote 11 to paragraph 47 sets out the criteria for deliverability. This is that sites should:

"Be available now;



Offer a suitable location for development now; and

Be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that the development of the site is viable."

- 1.27 The Housing Trajectory, as contained within the Housing Technical Paper (TOP04), sets out the principal sources of supply. These include:

Large Sites with Outline Planning Permission

Large sites with resolution to grant Outline Permission

Large Part 1 strategic allocations

- 1.28 There is a small windfall allowance of 75 dwellings in 2019/20.

- 1.29 The NPPG advises Planning Permission is not a pre-requisite for assessing deliverability and so long as there is a reasonable prospect of delivery the site can be included within the supply (NPPG Paragraph: 031 Reference ID: 3-031-20140306).

- 1.30 When assessed against the guidance of the NPPF (footnotes 11 and 12 to paragraph 47) the sites within the trajectory meet the requirements of being 'available'. However, for some sites the suitability of the sites, for example those within the Green Belt or the ANOB, and larger developments in villages, are reliant on the adoption of the local plan to be seen as suitable. As such, the Strategic Allocations are fundamental to achieving the anticipated delivery rates.

- 1.31 The strategic allocations, such as East Sutton Courtenay, are unconstrained and as such will form a vital source of supply in the short-term. East Sutton Courtenay is expected to deliver 23 dwellings in the period 2016/17 and 45 dwellings p.a, thereafter.

- 1.32 As mentioned part of this site is presently subject to an outline planning application. This site is available, deliverable and achievable as set out.

- 1.33 RHSM would like to emphasise that, in order to ensure that supply is maintained, the Council has proactively encouraged sites, such as East Sutton Courtenay to be brought forward in tandem with the Local Plan process to ensure that aspirations can be achieved.



1.34 The principal issue for the Council in demonstrating a 5 year land supply, is therefore, the need to have a plan in place to enable the delivery of the strategic allocations to deliver the housing requirement. This is particularly important for allocations within the South East Vale Sub-Area, where the majority of growth is focused and will need to be delivered to meet the wider strategy. The need to use the Liverpool Methodology to meet the shortfall must be tempered by the likelihood that, without the strategy set out within the Local Plan, there is little to no prospect of the housing requirements being met. This will exacerbate the current acute housing shortfall

1.35 11.2 Is it realistic that a five year supply of deliverable housing land would be maintained throughout the plan period?

1.36 As noted in our response to 11.1, a significant increase in housing will be required to demonstrate a five year supply of land.

1.37 Central to the land supply is a series of strategic allocations. Without these sites, some of which will require allocation to be delivered due to constraints such as the AONB or Green Belt, it will not be possible for the Council to achieve and then maintain the land supply position across the five years, particularly beyond 2016/17 where the supply from existing sites with planning permission (Full or Outline) begin to trail off as they reach completion. Careful monitoring of existing policies will need to be undertaken to ensure the five year supply and, if necessary, identify alternative sites (see response to Matter 13).

1.38 The trajectory sets a highly ambitious target for delivery. To maintain the land supply upwards of 1,900 dwellings will need to be delivered from 2017/18. However, whilst the aggregate numbers are significant, delivery figures for individual sites are considered realistic.

1.39 Furthermore, the Council intends to supplement strategic sites with a Site Allocations (Part 2 Local Plan), Neighbourhood Plans and a Presumption in Favour of Sustainable Development in the Market Towns, Local Service Centres and Larger Villages (Core Policy 4). RHSM consider that taken together with the strategic allocations, the policies provide sufficient flexibility for the market to respond to meet any shortfall in a planned and co-ordinated manner.

1.40 Conclusion

1.41 Currently the Council acknowledge that a five year supply of deliverable housing land cannot be identified, in accordance with NPPF Paragraph 47 against the stated housing requirement when the accumulated shortfall is taken into account.

1.42 We consider the Council will not be able to demonstrate a 5 year supply of land, unless the Local Plan is adopted as this contains the vision, strategy and a significant number of allocations for strategic sites.

1.43 The inclusion of Strategic Site 5 East of Sutton Courtenay is soundly based and deliverable.

1.44 **Word Count: 1,811.**

BIDWELLS



Cert No. 8542
ISO 9001, ISO 14001

Bidwells



@Bidwells



bidwells.co.uk

