

# Vale of White Horse EIP – Stage 2 – February 2015

## North Abingdon Local Planning Group Comments

### Matter 11 – Five Year Supply of Housing Land

#### 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?

We have previously expressed our concern about the 'objectively assessed need' figure which is key to answering this question. Broadly, half of that figure is based on what we consider are extremely optimistic forecasts of growth in the number of jobs. It is not reasonable or possible to set a very high target for growth 16 years in advance.

If we accepted that figure though, there would clearly be various key risks that the plan and the phasing does not address. These are, briefly:

- The forecast growth in jobs does not happen
- There are more jobs, but these merely replace losses of other jobs
- Property remains unaffordable for many people for various reasons so sales of new property are low
- Building starts in many locations, but growth and sales do not follow, so we end up with patchy development across too many sites
- Land or property speculators tie up the land or houses built on it making them unavailable

None of these (or other) risks are mitigated by the plan.

The risks could be mitigated by a monitored and careful release of land for housing as the extra jobs arise – thus accepting that not all sites might be released by the end of the plan period.

Comments on particular issues raised by NPPF paragraph 47 are:

- We think the plan does meet current assessed need for market and affordable houses. The table in Core Policy 4 (Section 4, page 38 of the Plan) sets out the overall figures. But as noted above we do not think that the assessment has been sufficiently '**objective**' or considered risks and mitigation.
- The strategic sites might produce more houses than the plan figures – though we are concerned about possible overcrowding as a result.
- In practice it may be possible to find more than the 1,900 Part 2 allocations and windfalls<sup>1</sup> mentioned in Core Policy 4, which would reduce the need for

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<sup>1</sup> Up to 1,000 Part 2 allocations + 900 windfalls.

strategic sites – the Part 1 allocations. In fact, only 1,400 houses (not 1,900) are needed to meet the overall 20,560 target<sup>2</sup>

- We do not think that the approach is ‘*consistent with the policies set out in this Framework*’ (the NPPF) as it allows extensive development on numerous Green Belt and AONB sites.
- ‘*key sites which are critical to the delivery of the housing strategy over the plan period*’ have been identified, but as the extent of growth is uncertain, we are not convinced that they are all ‘**critical**’. Several could be held back until it is clear that the planned growth in employment is actually taking place.

Section 7 of the plan (page 131) could be improved to mitigate the risks that considerable job growth does not materialise as planned. Section 7 just covers the risk that development sites do not come forward in a timely manner and what the Council would do in response. It does not consider what happens if sites are not needed.

Appendix H, the Monitoring and Implementation framework (this is on page 88 of the Appendices and is not Appendix G which is mentioned on page 131) gives more details of the monitoring arrangements for housing and employment development.

These all assume that the problem will be that growth is not fast enough and what could be done to speed it up.

For example, actions mentioned include:

*Consider the additional release / allocation of housing land; and*

*Review issues and actions available to bring forward employment development*

In practice neither approach might be effective or appropriate, if jobs growth or housing growth just does not materialise. Giving up control of development in these circumstances is an unbalanced, one sided way of controlling long term development in the Vale of White Horse.

The actions should be reworded (or added to) so that release of housing and development land can be slowed down if that is appropriate.

We commented on the house building rates in our earlier paper on the SHMA. We noted that Topic paper 4 of the plan (page 70) set out in detail how house construction might be phased. Some figures derived from that are as follows:

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<sup>2</sup> 1,400 = 20,560 – 1,250 completions – 781 estimated completions – 3,169 known commitments – 13,960 Part 1 allocations. From Core Policy 4. So arguably there is over provision of 500 or 2.4% of the 20,560.

<b>Period</b>	<b>Houses built or to be built</b>	<b>Years in the period</b>	<b>Average construction rate per year</b>	<b>North Abingdon site TOTAL build</b>
2011/12 - 14/15	2,031	4	508	
2015/16 - 19/20	8,047	5	1609	180
2020/21 – 24/25	7,351	5	1470	450
2025/26 – 29/30	3,238	5	647	170
2030/31	396	1	396	
<b>Total</b>	<b>21,063</b>	<b>20</b>	<b>1,053</b>	<b>800</b>

It is clear that:

- Building rates – at 508pa - have been less than half of the SHMA figure of 1,028 for the first four years;
- During the next five years the building rate of 1,609pa is higher than in any other period – this is 3.16 times more than in the last four years – a huge acceleration for the building industry. It is most probably unachievable; and
- The building rate then tapers off quite sharply, for the rest of the 20 year plan period.

We do not think that building rates can be increased by a factor of more than three in the Vale over the next five years. There are already shortages of skilled craftspeople.

We also conclude that there is more than sufficient land available for the plan period and for each of the five year periods within it.

We do not think there has been persistent under delivery in the Vale. We are not sure what to compare current building rates with. So there is no clear reason to increase the 5% buffer on the five year supply of land to 20%.

## **Density**

We are content that the plan sets out an approach to housing density that reflects local circumstances. This is in Core Policy 23, Chapter 6, page 93. This sets a target net density of at least 30 dwellings per hectare and produced a figure for the whole Abingdon North site of 800 dwellings (though as part of the site will not be developed, we think that should be reduced).

Net Density excludes major elements of supporting uses such as open space, community facilities, infrastructure etc.

We are particularly concerned that overcrowded developments should be avoided. So the plan does need to be much clearer about the effects of what open space (etc)

is allowed and how house numbers for particular sites are calculated. Also about whether any increases in these numbers will be considered and if so what they might be.

We have observed that a figure of 'around 800' houses, can by some be interpreted as up to 900.

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

Yes, as explained above.

Our major concern is that there are such high growth expectations for the area. These include pressures to cope with existing shortage, overspill pressure from Oxford city and pressure to cope with a huge increase in the number of jobs.

In particular, if the net jobs growth does not materialise there will be half as much demand for housing land. The plan should recognise this risk and mitigate it. We do not want to end up with the Vale covered with a patchwork of half developed housing sites, none of which stand any chance of being completed before 2050. This would severely damage the area, damage the businesses of builders and developers and remove key aspects of planning control from the local Council.

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**3 January 2016**

**Vale of White Horse EIP NALPG Comments on Matter 11.doc**

**1,336 words including all headings and questions**

## **Text of NPPF Para 47 (for reference, not part of our comments)**

47. To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, **objectively** assessed needs for market and affordable housing in the housing market area, as far as is **consistent with the policies set out in this Framework**, including **identifying key sites which are critical to the delivery of the housing strategy over the plan period**;
- identify and update annually a supply of specific deliverable<sup>11</sup> sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- identify a supply of specific, developable<sup>12</sup> sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

### **Footnotes**

11 To be considered deliverable, 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 development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

12 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.