

28 March 2019

Delivered by email

Planning Policy,
Vale of White Horse District Council,
135 Eastern Avenue,
Milton Park,
Abingdon,
OX14 4SB

Ref: DAVR3005

Dear Sir / Madam

**VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2: DETAILED POLICIES AND ADDITIONAL SITES - SCHEDULE OF
PROPOSED DRAFT MAIN MODIFICATIONS
REPRESENTATIONS ON BEHALF OF DAVID WILSON HOMES (SOUTHERN)**

We write on behalf of our client, David Wilson Homes (Southern) (hereafter referred to as "DWS") to submit representations on the Schedule of Proposed Draft Main Modifications to the Vale of White Horse Local Plan Part 2: Detailed Policies and Additional Sites.

INTRODUCTION

DWS is promoting land to the east of Grove (hereafter referred to as land at Tulwick Park, Grove) for development. The site extends from the railway line at its northern boundary to Tulwick Lane at its southern boundary. The A338 is located to the west. Grove Park Drive passes through the site.

This land was promoted by DWS at the LPP2 Preferred Options stage in 2017 as 'Land at Grove Park, Grove'. Comprehensive representations, supported by a suite of technical documents, including a Vision Document setting out the nature of development which could be delivered and a "Sustainability Appraisal" prepared by Turley were submitted in November 2017 at the Local Plan Publication stage.

Those earlier representations provide a detailed justification as to the reasons why land at Tulwick Park, Grove should be allocated and as such that explanation is not repeated in this letter.

Since the LPP2 Preferred Options stage, DWS has engaged with Grove Parish Council, Wantage Town Council, Network Rail and Stagecoach and has undertaken its own research to inform the proposals for the site.

The land promoted by DWS extends to 47.4 hectares and the site is capable of delivering:

- Up to 600 homes (as part of a phased development);

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

- Typical housing mix consisting of detached, semi-detached and terraced family homes;
- The creation of land for employment uses;
- A community hub which would provide a building in use class D1 which could provide a for a range of community uses, such as a medical facility as well as local retail opportunities to serve the residential and employment uses;
- A park and ride facility;
- A 1 form of entry primary school (which could be extended to 2 forms of entry);
- Other non-residential uses include playing pitches, play areas and a productive landscape;
- The delivery of road, pedestrian and cycle access between the A338 and an area of land which would be safeguarded for the delivery of the reopened Grove railway station; and
- Safeguarded land for delivery of the reopened Grove railway station, helping to facilitate this long term aspiration through the delivery of new infrastructure and improved access.

This site is not dependent upon the prior delivery of any adjacent sites which must come forward before it is delivered and is not reliant upon any other schemes in order for necessary accesses to be provided.

The representations submitted on behalf of DWS explain how the land at Tulwick Park, Grove can help to facilitate the delivery of long supported infrastructure in the area, namely the reopening of Grove railway station. However it is important to note that DWS consider that this site is a sustainable location for new development whether or not the station is reopened during the Plan period.

In addition, DWS participated in the LPP2 Examination hearing sessions. At that time, the Turley Statement to Matter 8 of the Examination set out significant concerns regarding a number of sites which were to make up the housing supply in the District. The Council has not provided any evidence to overcome those objections.

In addition, the material submitted on behalf of DWS set out specific a commentary and concerns regarding the deliverability of sites at Grove (namely Grove Airfield; Monks Farm; and North West Grove). To date, no evidence has been provided to this Examination to overcome those objections.

We therefore maintain our objections and concerns regarding housing supply and delivery from sites throughout the Vale of White Horse, with particular regard to the three sites at Grove.

REPRESENTATIONS ON THE VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2: DETAILED POLICIES AND ADDITIONAL SITES - SCHEDULE OF PROPOSED DRAFT MAIN MODIFICATIONS

The following representations are made in response to the relevant proposed draft Main Modification (using the same reference numbers).

As a general comment, we note there is a lack of evidence which has been prepared to support the Main Modifications. The Modifications appear to be derived from the Local Plan Inspector's letter of 19th December 2018, however that letter does not provide any explanation as to why a number of the Modifications are necessary.

As a further point, we note that DWS (and other parties) have consistently raised concerns regarding the deliverability of the proposed allocations in the LPP2 (and other commitments, for example the allocations in the

LPP1) to the extent that those allocations will be unable to deliver the level of housing required in the District by 2031. No analysis of evidence has been presented to rebut or address those fundamental issues.

MM2 - Core Policy 4a: Meeting our Housing Needs

DWS note that the Main Modifications propose a reduced requirement from additional LPP2 allocations (reduced from 3,420 to 2,420 reflecting the proposed removal of the allocation at Harwell Campus). In addition, changes are proposed to the table within Core Policy 4a to redistribute dwellings between different sources of supply, for example by increasing the figure from known commitments and reducing the level of housing expected from LPP1 allocations.

The effect of these Main Modifications is that the LPP2 now proposes a total supply (at 31st March 2018) of 25,359 dwellings. This is set against the LPP1 housing requirement for 20,560 dwellings to meet the needs of the VoWH and 2,200 dwellings to meet the unmet needs of Oxford City.

Notwithstanding the Main Modifications and the redistribution of the housing supply between allocations and commitments, DWS maintains its objections (as set out in its representations at the Proposed Submission stage and to the LPP2 Examination hearing statements) that there are significant concerns over the deliverability of a number of the existing commitments (including LPP1 allocations) and the proposed allocations within the draft LPP2.

The Turley Statement to Matter 8 of the LPP2 Examination set out a detailed analysis of housing supply within the VoWH. Whilst we do not repeat the commentary regard specific sites as set out in that Statement, we note the overall conclusion that there would be substantial shortfalls between the likely supply of housing to 2031 and the level of delivery anticipated by the LPA. The Turley Statement to Matter 8 highlighted that these shortfalls would exist in each part of the VoWH, including the Western Vale Sub-Area, the South East Vale Sub-Area and the Abingdon and Oxford Fringe Sub-Area. In addition, the Turley Statement highlighted shortfalls in the 'Science Vale Ring Fence' area and the Rest of the District area which are used by the VoWH for the calculation of disaggregated housing supply requirements.

The Main Modifications do not include any measures to overcome these shortfalls in delivery. On the face of it, it may appear as though providing for more dwellings than is required (to meet the housing requirement of the VoWH and the apportionment of Oxford City's unmet need) is a step towards providing the flexibility to achieve the overall requirement. However that would only be the case if the combined sources of supply were likely to deliver in the manner expected by the Council. The Council has not provided any evidence to support its proposed housing trajectory and in contrast, the detailed analysis undertaken by Turley on behalf of DWS highlights that there will be significant shortfalls of housing in all areas of the VoWH. Rather than representing an oversupply, the combined sources of housing will not achieve the housing requirement.

DWS consider that this matter should be resolved and that sustainable sites (such as the land at Tulwick Park, to the east of Grove) exist to achieve this.

DWS consider that Core Policy 4a should be revised such that it provides for a realistic (rather than significantly overly optimistic and unrealistic) level of delivery from specific sites. DWS's comments on specific sites are contained in the Turley Statement to Matter 8 with further commentary where relevant set out in these representations below.

DWS participated in the LPP2 Examination hearing sessions. At that time, the Turley Statement to Matter 8 of the Examination set out significant concerns regarding a number of sites which were to make up the housing supply in the District. The Council has not provided any evidence to overcome those matters.

In addition, the material submitted on behalf of DWS set out specific concerns regarding the deliverability of sites at Grove (namely Grove Airfield; Monks Farm; and North West Grove). To date, no evidence has been provided to this Examination to overcome those matters.

We therefore maintain our concerns regarding housing supply and delivery from sites throughout the Vale of White Horse, with particular regard to the three sites at Grove.

Meeting the Needs of Oxford City

In addition to the comments set out above, DWS also note that it is now possible (due to the progress made with the draft Oxford City Local Plan and the draft South Oxfordshire Local Plan) to have a greater degree of certainty over the level of unmet housing need arising from Oxford City. **Appendix 1** of these representations includes an analysis undertaken by Turley using the requirements in the existing and emerging Local Plan documents. The Oxfordshire Housing & Growth Deal commits all of the Oxfordshire Authorities to the delivery of 100,000 homes in the County by 2031. However Appendix 1 of these representations demonstrates that the adopted and emerging Local Plans for the Oxfordshire Authorities only provide for a maximum of 94,236 dwellings (a shortfall of **5,764** dwellings against the Housing & Growth Deal requirement) through the planned policy requirement and the capacity led approach used in Oxford City.

DWS consider that it is essential that the Development Plans in Oxfordshire set a planning policy requirement which is collectively capable of achieving the requirements of the Housing & Growth Deal (as a minimum). As it is currently prepared, the VoWH LPP2 will contribute to a Development Plan context which fails to deliver on the key commitments made by the Oxfordshire authorities.

In light of the above commentary and in order for the Policy and Plan to be found sound, DWS consider that there is a clear and compelling case that the VoWH should increase its planned housing requirement such that it helps to resolve the shortfall in housing delivery throughout Oxfordshire by 2031 both to support the needs of the City and to help ensure that the commitments in the Growth Deal are achieved.

DWS do not consider that it would be acceptable to delay addressing this shortfall until Local Plan reviews are undertaken. Achieving 100,000 homes in Oxfordshire is an essential component of the Growth Deal and should be addressed and planned for at the first opportunity. The LPP2 represents one such opportunity.

This shortcoming should be resolved as a matter of urgency. DWS consider that there are sites (such as the land at Tulwick Park, to the east of Grove) exist to achieve this.

MM3 - Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area

The Main Modifications update the tables within Core Policy 8a to refer to different quantum of development from the various sources of supply. As with other amendments, this approach makes amendments which redistribute dwellings from allocations to known commitments. However DWS again refer to the analysis submitted in the Turley Statement to Matter 8 of the LPP2 Examination hearing sessions and the considerable issues regarding the deliverability of particular sites which make up the expected sources of supply.

DWS consider that Core Policy 8a should be revised such that it provides for a realistic (rather than significantly overly optimistic and unrealistic) level of delivery from specific sites.

MM8 - Core Policy 15a: Additional Site Allocations for South East Vale Sub-Area

Core Policy 15a is proposed to be modified by removing the allocation at Harwell Campus and by making other amendments to the sources of housing land supply which update the tables within Core Policy 15a to refer to different quantum of development from the various sources of supply. As with other amendments, this approach makes amendments which redistributes dwellings from allocations to known commitments. However DWS again

refers to the analysis submitted in the Turley Statement to Matter 8 of the LPP2 Examination hearing sessions and the considerable concerns over the deliverability of particular sites which make up the expected sources of supply.

As set out in the Main Modifications, Core Policy 15a (and Core Policy 4a) retains the proposed allocation of the land north west of Grove for 400 dwellings during the Plan period. As set out in our previous representations, we have significant concerns regarding the retention (and reliance) upon this proposed allocation when evidence demonstrates the substantial issues which will need to be addressed if it is to be delivered by 2031.

In addition, Core Policy 15a has not been modified in response to the clear evidence that significant concerns exist regarding the deliverability of a number of the existing allocations (and therefore known commitments) in the South East Vale Sub-Area.

DWS consider that Core Policy 15a should be revised such that it provides for a realistic (rather than significantly overly optimistic and unrealistic) level of delivery from specific sites.

Delivery at Grove

The LPP2 proposes to allocate land at North West Grove for 400 dwellings in the Plan period, whilst the LPP1 expected the Grove Airfield and Monks Farm sites at Grove to contribute a combined total of 3,385 dwellings to 2031. In total these three sites at Grove were anticipated to provide 3,785 dwellings by 2031 (representing 41.8% of all housing expected in the South East Vale Sub-Area) in the Proposed Submission version of LPP2.

As far as we are aware, the Main Modifications do not propose any alterations to the level of development expected from these three sites by 2031 and as such the Council still expects that they will make a substantial contribution to the overall level of development planned in the South East Vale Sub-Area (and the District overall).

The Turley Statement to Matters 6 (South East Vale Sub Area) and 8 (Housing Land Supply, Viability, Delivery and Monitoring) set out significant concerns associated with the delivery of three sites at Grove (Grove Airfield, Monks Farm (LPP1 allocations) and the land at North West Grove which is to be allocated in the LPP2). In short, these objections relate to the need to create a Grove Northern Link Road (GNLR) from the A338 through Monks Farm, crossing Denchworth Road, through the North West Grove proposed allocation and then running through the Airfield. As this GNLR passes through each site, the delivery of each allocation is therefore reliant upon other land coming forward.

At the time of the LPP2 Examination, we set out significant objections in relation to the delivery of the Monks Farm (LPP1 allocation) site. Part of this site is the subject of an application (P16/V0981/O) for the following development:

“Application for outline planning permission for up to 400 dwellings, extension to the Grove CE primary school, associated landscaping and infrastructure with all matters except access reserved. (As amended & amplified by information received 3 January 2018).”

Despite having been submitted in April 2016, and amended in January 2018, nearly three years after its submission permission is still to be granted. The application was considered at the VoWH DC's Planning Committee on 11th July 2018. The Committee resolved to grant permission, subject to the completion of a S106 Agreement to secure contributions to local infrastructure, the transfer of land for primary school expansion and open space and to secure affordable housing; and a series of conditions.

Part of the complication of delivering the GNLR is that the Monks Farm application boundary (for P16/V0981/O) does not extend as far as Denchworth Road to the west, meaning that there is a clear obstacle to the GNLR. Since that connection is required to serve the Grove Airfield allocation and is also intrinsically linked to the delivery of the proposed North West Grove allocation, the lack of progress with the Monks Farm application (and the omission of

the land adjacent to Denchworth Road) calls into question the extent to which those other sites will also be delivered.

In fact, the Committee Report on the Monks Farm application referred to these concerns in relation to the GNLR. The Committee Report summarised the comments from Oxfordshire County Council as being:

“5.4 The development is proposed to be served by two vehicle access points, one off the A338 (the Northern Link Road - NLR), and a secondary access link onto Denchworth Road (at The Maples junction). These access points are acceptable subject to the comments below.

*5.5 Highways raise no objection on highway safety or traffic generation grounds on the wider network, subject to conditions and contributions to strategic highway improvements, but do raise concern over the capacity of the existing A338 junction into the site. **This is based on a short section at the Denchworth Road end of the NLR not being part of this application, resulting in a risk that the road is never completed as a through route.***

5.6 To mitigate this concern the applicant proposes the secondary access onto Denchworth Road at the junction of The Maples. Highways advise this will need to be provided prior to occupation of the 150th dwelling. This can be secured by condition.

5.7 Subject to relevant conditions and those contributions sought for strategic highway improvements, the proposal accords with policy DC5 and the NPPF in respect of traffic and highways.”

It is evident that the County Council’s stated position is that due to the exclusion of land on the northern side of Denchworth Road from the Monks Farm application boundary, **there is a risk that the GNLR is never completed as a through route.** The Committee Report on the Monks Farm scheme refers to a secondary access at the junction of The Maples which is to be provided prior to the occupation of the 150th dwelling. DWS do not consider that this secondary access at the junction of The Maples is capable of performing the same function as the GNLR. Both Denchworth Road and The Maples are narrow in width, with The Maples being designed to serve a residential development of less than 20 dwellings.

DWS consider that this concern, as expressed by the County Council is well-founded and justified. However despite this issue, the Council still relies upon housing allocations at Grove which require the GNLR to be delivered. We consider that this reliance is misplaced.

A search of the Council’s online planning application register indicates that no applications have come forward in respect of the land between Denchworth Road and the Monks Farm site.

The Grove Airfield outline permission (P12/V0299/O) is subject to Condition 30 which states:

“No more than 1,500 dwellings shall be occupied before the Northern Link Road, linking the northern spur road and the A338 has been constructed and made available for use in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority.”

The Grove Airfield scheme therefore requires the GNLR from the Airfield site to the A338, passing through what is now the Monks Farm allocation. As this the earlier representations on behalf of DWS set out, whilst the Grove Airfield application makes provision for a road to the extent of their control, the delivery of the GNLR through Monks Farm is subject to considerable uncertainty.

This constraint is reflected in a Phasing Plan which has been submitted by Persimmon to discharge condition 5 of the outline permission demonstrates the site will come forward in the following phases:

- Phase 1 – 750 dwellings, inside the GNLR;
- Phase 2 – 750 dwellings, mostly inside the GNLR;
- Phase 3 – 1,000 dwellings, almost entirely outside the GNLR.

As we set out above, the delivery of the GNLR is likely to be substantially delayed, or undeliverable at Monks Farm for the following two reasons:

- The GNLR is potentially undeliverable due to land vital for its delivery being controlled by a third party, out of the control of the Applicants' or Local Authority;
- The delivery of the GNLR will potentially be substantially delayed (if deliverable) because there are first landownership issues to be resolved, and second its delivery is reliant on obtaining satisfactory legal permissions to cross the BOAT, through a potentially complicated procedure.

We consider that there must be significant doubt as to whether the GNLR can be delivered from the Grove Airfield site to the A338 (as accepted by the County Council) and as a result whether more than 1,500 dwellings can be occupied at the Airfield. The third phase of this allocation, as proposed in Persimmon's phasing plan, should be considered undeliverable at this stage.

However the issues regarding the deliverability of Grove Airfield do not only relate to the GNLR. The Grove Airfield application was submitted by Persimmon and Taylor Wimpey. However our understanding is that Taylor Wimpey have no current interest in the scheme and that Persimmon's interest relates to no more than 1,500 dwellings. We therefore consider that there is significant doubt regarding the deliverability of the remainder of the Grove Airfield scheme.

DWS maintains significant objections regarding the deliverability of the three sites at Grove. There does not appear to have been any progress with the Monks Farm application since July 2018 and that application has been with the LPA for close to three years. However the delivery of the Monks Farm site, particularly the delivery of the GNLR through it, is essential to the deliverability of the sites at Grove Airfield and North West Grove. Despite the critical nature of the GNLR, the current Monks Farm application is unable to deliver this requirement as the site excludes the land required to connect to Denchworth Road and no other schemes have come forward in respect of that area. There is no proposal in respect of the intervening land to provide for the missing stretch of the GNLR.

DWS consider that it is essential that the Examination of this LPP2 grapples with the fundamental uncertainty associated with the deliverability of these three sites at Grove which make up a significant component of the housing which the VoWH expects to be delivered in the South East Vale Sub-Area and the Science Vale ring fence area (and the District). This part of the VoWH is critical to the economic growth aspirations of the VoWH (and for that matter, Oxfordshire as a whole) and it is of significant concern that the Council seeks to rely on sites which have significant obstacles to their deliverability.

The Council already expects two sites at Grove to be developed, despite the uncertainty over the GNLR. The effect of the LPP2 is that three sites, all of which rely on the GNLR, will be expected to be developed at Grove despite this uncertainty.

As a consequence, the level of housing to be provided on these three sites by 2031 should be substantially reduced. This will have an impact on the available supply to achieve the requirement in the South East Vale Sub-Area and the Science Vale Ring Fence area. Alternative sites, such as the land at Tulwick Park to the east of Grove, are available as sustainable locations which are capable of making a meaningful contribution to housing delivery in this critical

part of the VoWH early in the Plan period. Significantly, the delivery of the land at Tulwick Park, Grove does not require the earlier delivery of infrastructure from any other sites.

MM10 - Supporting text, Para 2.98 to 2.100

The revised text proposed to be included at paragraphs 2.98 – 2.100 is to include the following wording:

“IT IS IMPORTANT THAT THE NEW DEVELOPMENT PLANNED FOR WANTAGE AND GROVE DELIVERS INFRASTRUCTURE (SUCH AS NEW SERVICES, FACILITIES AND ROADS) ALONGSIDE THE DELIVERY OF NEW HOUSING. TO ASSIST WITH INFRASTRUCTURE DELIVERY IN THIS AREA, AN ADDITIONAL DEVELOPMENT SITE IS ALLOCATED IN THE PART 2 PLAN AT NORTH-WEST OF GROVE ON LAND BETWEEN THE MONKS FARM AND GROVE AIRFIELD SITES.”

DWS agree that it is important that the new development planned in the area does deliver new infrastructure. However as the preceding section of these representations explains (supporting the earlier representations and Hearing Statements submitted on behalf of DWS), there are significant concerns over the deliverability of the sites at Grove as a direct consequence of the complications of providing infrastructure, namely the GNLR which has a bearing upon the trajectory of all three sites.

The revised text is also proposed to read:

“THE ALLOCATION OF THE NORTH-WEST OF GROVE SITE WILL ASSIST WITH DELIVERING THE NORTH GROVE LINK ROAD (GNLR) THAT WILL FORM AN IMPORTANT CONNECTION BETWEEN GROVE AIRFIELD AND THE A338, ALONG WITH CONTRIBUTING TO A RANGE OF OTHER SERVICES AND FACILITIES. ALLOCATING THIS SITE WILL ALSO ENSURE THE MASTERPLANNING FOR THIS SITE CAN BE CONSIDERED ALONGSIDE PLANNING FOR THE MONKS FARM AND GROVE AIRFIELD SITES, ENSURING THEY ARE FULLY INTEGRATED. IT IS, HOWEVER, EXPECTED THAT HOUSING DEVELOPMENT ON THE NORTH-WEST OF GROVE SITE WILL NOT COME FORWARD UNTIL TOWARDS THE END OF THE PLAN PERIOD AND MUCH CLOSER TO 2031. IT IS THEREFORE IMPORTANT TO CONSIDER THE LONG-TERM DEVELOPMENT POTENTIAL FOR GROVE AND PLAN EFFECTIVELY FOR ITS DELIVERY.”

DWS do not agree with the assertion that North West Grove will assist in delivering the GNLR. This road is required to serve the Grove Airfield scheme, regardless of whether the North West Grove site is developed. In addition, as set out above, the delivery of the GNLR is highly doubtful due to the fact that the Monks Farm application site boundary does not include the land required to connect the GNLR to Denchworth Road.

The GNLR must be delivered regardless of the North West Grove proposed allocation. However the North West Grove allocation makes the delivery of the GNLR no more certain and this remains highly doubtful.

MM12 - Core Policy 19a: Reopening of Grove Railway Station

DWS note that the Main Modifications propose to expand the land which is safeguarded for the reopening of Grove Railway Station to include the land to the east of the A338. DWS has been advocating this approach as this maximises the opportunities and flexibility required in order to support the reopening of the station. This approach is necessary since the material submitted on behalf of DWS (namely to the Proposed Submission version of the LPP2 and the LPP2 Examination Hearing Statements) establishes that the proposed safeguarded land to the west of the A338 is the subject of obstacles which mean that it is unlikely to be able to accommodate a new station.

As well as the objections expressed by Turley on behalf of DWS (in our previous representations, Hearing Statements and document HEAR06.3.2), we note that Williams Grand Prix Engineering Limited has expressed a series of issues regarding (document HEAR06.3.1) the implications of a number of the options for accommodating a new station on its own operations. We consider that the fact that these concerns have been raised by a third party supports DWS's approach of advocating flexibility.

DWS support MM12 and consider that it represents a positive response to the objections raised.

In addition, DWS support the proposed amendment to the Policies Map and Appendix B for land safeguarded for Grove Railway Station to include the site east of A338.

Summary

Whilst DWS supports MM12 and the inclusion of additional land being safeguarded for the reopening of Grove Railway Station, the Main Modifications do not grapple with the issue of the deliverability of the existing allocations in LPP1 and the proposed allocations in LPP2.

The fundamental objections raised previously on behalf of DWS regarding the LPA's reliance on sites which are not deliverable (at least to the extent envisaged by the Council) have not been addressed and as such those concerns remain in their entirety.

The objections raised by DWS regarding the deliverability of the Council's housing land supply are demonstrated clearly by a consideration of the three sites at Grove allocated in LPP1 and proposed for allocation in LPP2. These sites rely on a single piece of infrastructure – the GNLR. This is critical to the delivery of the Grove Airfield scheme which requires the completed GNLR before the occupation of more than 1,500 dwellings. However the County Council's stated position (as set out in the Monks Farm Committee Report is that the GNLR may never come forward as a through road). If that is the case then as things stand, not more than 1,500 dwellings could be delivered at the Grove Airfield site.

The Monks Farm allocation was envisaged as providing the GNLR between the A338 and Denchworth Road. However the subsequent Monks Farm planning application excludes the land required for the connection to Denchworth Road and the application has been with the LPA for nearly three years without having been determined and without resolution of the critical highways matter. In resolving to grant permission for the Monks Farm application, the Committee Report explained that the GNLR may never be completed as a through route.

The proposed allocation at North West Grove is said by the LPA as being able to assist with the GNLR. It plays no such role. The GNLR is required regardless of whether North West Grove is allocated. Regardless of whether North West Grove is allocated, the Airfield still requires the connection to be made to the A338, and the inability to connect the GNLR from Monks Farm to Denchworth Road remains (with this being described as something that may never happen).

The Council's reliance on sites with such obstacles to delivery supports the case made by DWS at the Local Plan Examination that the housing requirement in the VOWH will not be achieved. As Turley's Statement to Matter 8 of the Examination demonstrates, the existing and proposed allocations will result in a significant shortfall against the level of housing delivery expected by the LPA in all parts of the District.

We maintain that this issue is fundamental and critical to the soundness of the LPP2 bearing in mind the 'tests of soundness' set out at paragraph 182 of the NPPF (2012). The Plan is not deliverable and the shortfall of housing supply against requirements will fail to achieve sustainable development. This flaw means that the Plan will not provide the quantum of housing identified as being required with consequential impacts on the economic growth of the area. In order to ensure that the LPP2 is a deliverable Plan, DWS consider that it should be revised in order to allocate sufficient sites which are capable of collectively delivering the housing requirement to 2031.

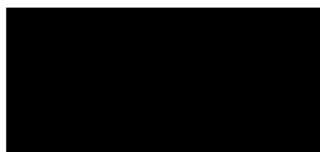
A reliance upon undeliverable housing sites also brings in to question the matter of whether or not the 100,000 homes required by the Oxfordshire Housing & Growth Deal by 2031 will be achieved. In order to ensure that the VoWH plays its proper role in achieving the commitments in the Housing & Growth Deal, DWS consider that the LPP2 should be revised in order to allocate sufficient sites which are capable of collectively delivering the housing requirement to 2031.

Notwithstanding all of the comments set out in these representations, it is now clear that the unmet housing need arising from Oxford City is significantly greater than previously thought when the 'working assumption' apportionment was set out in 2016. In combination the adopted and emerging Local Plans in Oxfordshire fail to plan for the 100,000 homes required by the Oxfordshire Housing & Growth Deal by 2031. This is due to the fact that Oxford City has identified that fewer dwellings can be accommodated within its own boundaries than their HELAA suggested in 2016. As things stand, it is expected that the adopted and emerging Plans set out requirements for 5,764 fewer dwellings than the Housing & Growth Deal requires by 2031.

We consider that steps should be taken to ensure that the LPP2 supports measures to ensure that this shortfall is accommodated. That would be achieved by allocating sites, in addition to those in LPP2 (particularly those which are subject to deliverability obstacles) which can deliver housing during the Plan period to 2031.

We therefore consider that the LPP2 should be reviewed in order to allocate additional or alternative sites to ensure that the housing requirement can be achieved, the greater unmet housing needs from Oxford City can be accommodated and in doing so, ensure that the LPP2 plays a full and proper role in providing for the commitments of the Housing & Growth Deal.

Yours sincerely



David Murray-Cox
Associate Director



Appendix 1: Meeting the Housing Needs of Oxford City

INTRODUCTION

- 1.1 DWS note that the purpose of the VoWH LPP2 is, in part, to help address the unmet needs arising from Oxford City. It is well known and established that as an Authority, with boundaries tightly drawn around its urban area, the City Council is unable to accommodate its own housing needs in full.
- 1.2 DWS consider that it is essential to consider whether the LPP2 is written and prepared in such a way that it supports the delivery of 100,000 new homes in Oxfordshire by 2031, as per the requirements of the Oxfordshire Housing & Growth Deal.
- 1.3 The SHMA 2014 was intended to set out an objective assessment of housing need for each of the Oxfordshire authorities over the period 2011 – 2031, with the housing requirement range and ‘midpoint’ set out in Table 1.1 below:

Table 1.1: Strategic Housing Market Assessment 2014 Objective Assessment

Authority	Housing requirement per year (2011 – 2031)	
	Range	Midpoint
Cherwell	1,090 – 1,190	1,140
Oxford	1,200 – 1,600	1,400
South Oxfordshire	725 – 825	775
Vale of White Horse	1,028	1,028
West Oxfordshire	635 – 685	660
Oxfordshire	4,678 – 5,328	5,003

- 1.4 Since the publication of the SHMA in 2014, the Oxfordshire authorities have agreed a Housing & Growth Deal with central Government. Whilst this places several commitments on the parties to the Deal, we note that the authorities commit to the delivery of 100,000 homes in Oxfordshire by 2031. This broadly reflects the culmination of the delivery by the authorities of the SHMA 2014 ‘midpoint’ as shown by Table 1.1 above.
- 1.5 This Note explores two factors:
 - Whether the commitment for 100,000 homes in Oxfordshire is being planned for; and
 - Whether the adopted and emerging Plans in Oxfordshire make provision for the unmet housing needs of Oxford City.
- 1.6 The SHMA figures, in particular the ‘midpoint’ of the objectively assessed range, have subsequently informed the adoption of the Cherwell Local Plan 2011 – 2031 (Part 1), the Vale of White Horse Local Plan 2031 Part 1 and the West Oxfordshire Local Plan 2031. Each of these adopted Local Plans covers the period 2011 – 2031.

- 1.7 This is demonstrated by table 1.2 which reveals that Cherwell, Vale of White Horse and West Oxfordshire District Councils are collectively planning for 56,600 dwellings for their own needs against the SHMA midpoint.

Table 1.2: Planned provision for authorities against SHMA midpoint

Local Authority	Planned provision for that Authority against SHMA midpoint
Cherwell District	22,840 (midpoint 22,800)
Vale of White Horse District Council	20,560 (midpoint 20,560)
West Oxfordshire District Council	13,200 (midpoint 13,200)
TOTAL	56,600 dwellings

- 1.8 The 'midpoint' of the SHMA 2014 revealed a requirement for 28,000 homes (1,400 dwellings per annum) in Oxford City.
- 1.9 It is well established and understood that Oxford City is unable to accommodate all of its housing need within its own administrative boundaries.
- 1.10 It is important to note that the Oxfordshire Growth Board (OGB) agreed a 'working assumption' in November 2015 that the unmet housing need arising from Oxford City equated to 15,000 dwellings in the period April 2011 to March 2031.
- 1.11 The OGB meeting on 26 September 2016 considered the recommended apportionment of the unmet needs of Oxford City. The recommended apportionment was proposed as shown by Table 1.3.

Table 1.3: OGB Recommended Apportionment of Oxford City Unmet Need

Local Authority	Recommended Apportionment
Cherwell District	4,400 dwellings
Oxford City Council	550 dwellings
South Oxfordshire District Council	4,950 dwellings
Vale of White Horse District Council	2,200 dwellings
West Oxfordshire District Council	2,750 dwellings
TOTAL	14,850 dwellings

- 1.12 At the time, South Oxfordshire District Council was unwilling to accommodate the recommended apportionment and instead earlier drafts of the Local Plan made provision for 3,750 dwellings towards the City's unmet housing need.

- 1.13 However, DWS consider that it is now possible to establish whether the adopted and emerging Local Plans within Oxfordshire support the Housing & Growth Deal's aims of 100,000 homes in the County by 2031.
- 1.14 As shown by Table 1.2 above the Local Plans adopted since the publication of the SHMA in 2014 plan for 56,600 dwellings to meet the needs of those authorities.
- 1.15 In addition, Cherwell District Council, Vale of White Horse District Council and West Oxfordshire have adopted, or are in the process of adopting Local Plans which seek to address the unmet housing needs from Oxford City. For example:
- Cherwell District Council is producing a Partial Review of Cherwell Local Plan 2011-2031 - Oxford's Unmet Housing Need (currently at Examination) which provides for 4,400 dwellings of Oxford City's unmet need.
 - The Vale of White Horse District Council is in the process of producing a Local Plan Part 2 (currently at Examination) to provide for 2,200 dwellings of Oxford City's unmet need.
 - West Oxfordshire District Council's adopted Local Plan 2031 provides for 2,750 dwellings.
- 1.16 In combination, Cherwell District Council, Vale of White Horse District Council and West Oxfordshire plan for **9,350 dwellings** for Oxford City's unmet housing need.
- 1.17 For their own needs, and those arising from Oxford City, Cherwell District Council, Vale of White Horse District Council and West Oxfordshire therefore plan for **65,950 dwellings between 2011 – 2031** (56,600 plus 9,350).
- 1.18 The South Oxfordshire Local Plan 2034 covers the period 2011 – 2034 and plans for an annual rate of 775 dwellings. Over the period 2011 – 2031 this equates to a total of 15,500 dwellings for the need of South Oxfordshire against the SHMA 2014 midpoint.
- 1.19 In addition, South Oxfordshire District Council now seeks to provide for 4,950 dwellings for the unmet housing needs of Oxford City.
- 1.20 During the period 2011 – 2031, South Oxfordshire District Council therefore plans for a requirement of 20,450 dwellings (750 x 20 years plus 4,950 for the City's unmet need).
- 1.21 In light of the above, Table 1.4 shows the quantum of development planned for by Cherwell, South Oxfordshire, Vale of White Horse and West Oxfordshire during the period 2011 – 2031.

Table 1.4: Housing Requirement (2011 – 2031) Oxfordshire Authorities (with the exception of Oxford City)

Authority	Housing requirement (2011 – 2031)	
	Meeting the District's Need	Meeting Oxford City's Need
Cherwell	22,840	4,400
South Oxfordshire	15,500	4,950
Vale of White Horse	20,560	2,200

West Oxfordshire	13,200	2,750
Sub-total	72,100	14,300
Total	86,400	

- 1.22 Table 1.4 demonstrates that the adopted and emerging Local Plans in Oxfordshire (with the exception of Oxford City) (including the emerging VoWH LPP2) provide for a total of 86,400 dwellings (being the policy requirement).
- 1.23 Since the apportionment of Oxford City's unmet housing need, the City Council has consulted on its own draft Local Plan. The City Council's Proposed Submission Local Plan is intended to cover the period 2016 – 2036, however it is possible to establish the quantum of development expected between 2011 – 2031. The City Council submitted its Local Plan for Examination on 22nd March 2019.
- 1.24 Oxford City Council's latest Annual Monitoring Report for the period 2017/2018 published in October 2018 indicates that 2,026 dwellings were completed in the period 2011 – 2018, with 1,371 dwellings completed between 2011 – 2016 (i.e. in the Growth Deal period but before the Local Plan period). At the start of the proposed Plan period for the draft Oxford City Local Plan, its unmet need against the SHMA 2014 midpoint therefore stood at 26,629 dwellings (28,000 minus 1,371). Table 1.3 above demonstrates that Cherwell, South Oxfordshire, Vale of White Horse and West Oxfordshire District Councils collectively plan for 14,350 dwellings to meet the needs of the City.
- 1.25 The City Council's Submission Local Plan explains that the housing target is established upon a 'capacity based' assessment and as a result Policy H1 of that Plan explains that provision is made for a total of 8,620 dwellings between 2016 – 2036, with 7,600 of these on deliverable sites in the HELAA and 1,020 dwellings from windfall sites.
- 1.26 Using the completions (1,371 dwellings) in Oxford City between 2011 – 2016 and the annual requirement to be applied by the City Council during the Plan period (431 dwellings per annum), we therefore calculate that provision is made for 7,836 dwellings in the City during the period 2011 – 2031. As shown by Table 1.5 below.

Table 1.5: Oxford City Supply 2011 - 2031

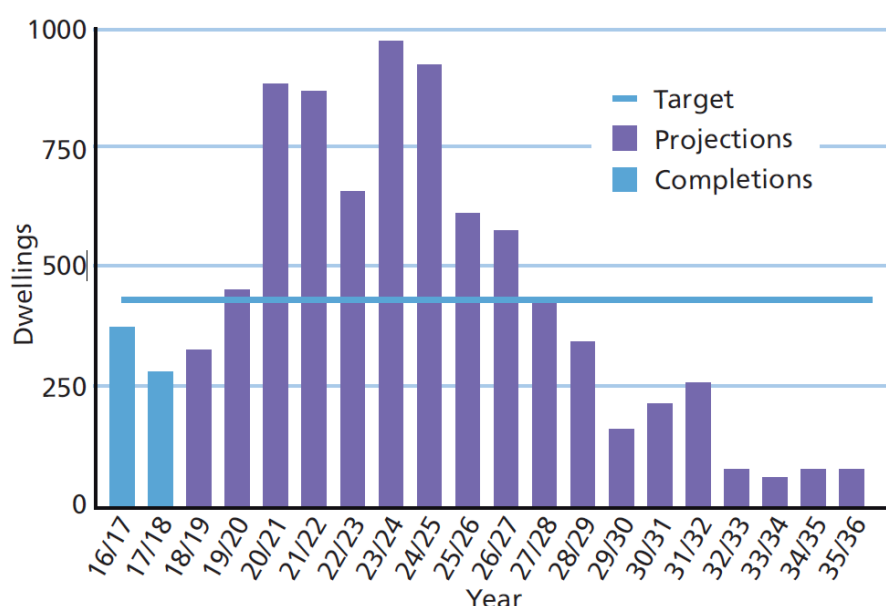
Completions between 2011 - 2016	1,371 dwellings
Requirement between 2016 – 2031 (15 x 431 dwellings per annum)	6,465 dwellings
Total provision during 2011 - 2031	7,836

- 1.27 The provision of 7,836 dwellings over 2011 – 2031 is substantially less than the figure that led to the 'working assumption' that the City Council's unmet need amounted to 15,000 dwellings. If provision is made for 7,836 dwellings in the City between 2011 – 2031 then that implies an unmet need of 20,164 against the SHMA midpoint of 28,000 dwellings (28,000 minus 7,836).
- 1.28 It is acknowledged that the housing trajectory presented at Diagram 3 of the Oxford draft Plan (an extract of which is provided below at Figure 1.1), implies that between the periods 2019/20 to 2026/27 Oxford City expect housing delivery to be in excess of the baseline 431 dwellings per annum and as a result housing delivery thereafter will be reduced. Overall, implying that the majority of the 8,620 dwellings planned

between 2016 – 2036 will be delivered before 2031. This position has been reaffirmed through Oxford City’s response to Matter 2 of the Cherwell Examination in Public, which notes at paragraph 31 that “Only 308 of these homes are expected in the housing trajectory to deliver in the 2032-2036 period”

Figure 1.1: Extract of Diagram 3 of Oxford City draft Local Plan

Diagram 3: Housing Trajectory 2016-2036



- 1.29 However, it is clear following a review of the draft Oxford City Local Plan that there is no mechanism or planning policy which seeks to control the phasing of development to ensure that it delivers within this time period and thereby no certainty of delivery prior to 2031. As such it is DWS view that this should not be given any weight by SODC in the preparation of their Plan.
- 1.30 As such, if just 7,836 dwellings are delivered in the City between 2011 to 2031 and the other Districts (including South Oxfordshire) plan for 86,400 then this indicates that there will be a total provision of **94,236** dwellings in the County during this period compared to the requirement for **100,000**. This would represent a substantial shortfall of **5,764** dwellings against the 100,000 homes which underpins, and is a key commitment of, the Oxfordshire Housing and Growth Deal.
- 1.31 DWS consider that this failure could lead to significant and concerning economic implications and that it would fail to support the significant need for affordable housing within Oxfordshire. As a consequence, it is essential that provision for this outstanding shortfall is not delayed. It is essential that the Local Plan context within the County makes provision for it.
- 1.32 The importance of the Growth Deal is such that neither the Oxfordshire Authorities, nor the Government as a key party to the Housing and Growth Deal should seek to rely on other measures to resolve this shortfall. In fact, there are few other measures available since the Government has applied ‘planning flexibilities’ in Oxfordshire such as a 3 year housing land supply requirement until the adoption of a Joint Statutory Local Plan and upon its adoption, a bespoke Housing Delivery Test (details to be confirmed) for three years. As a result, there will be a period of six years where the expectations on delivery and identifiable housing land supply are reduced. The authorities and Government cannot therefore rely on

the market and developers bringing forward sites to resolve this shortfall because of the relaxation of the policy requirement.

- 1.33 Similarly, DWS do not consider that it would be unacceptable to delay addressing this shortfall until Local Plan reviews are undertaken. Achieving 100,000 homes in Oxfordshire is an essential component of the Growth Deal and should be addressed and planned for at the first opportunity. The LPP2 represents one such opportunity.

MODIFICATIONS

- 1.34 In light of the above commentary and in order for the Policy and Plan to be found sound, DWS consider that there is a clear and compelling case that the VoWH should increase its planned housing requirement such that it helps to resolve the shortfall in housing delivery throughout Oxfordshire by 2031 both to support the needs of the City and to help ensure that the commitments in the Growth Deal are achieved.
- 1.35 The Local Plans for South Oxfordshire and Oxford City (as well as the emerging VoWH LPP2) are the only two which are still to be adopted in the County and therefore the only opportunities to resolve this shortfall in a timely manner. Since the Oxford City Local Plan is a response to the constraints in that authority, the burden must fall to those authorities who are able to make provision for this unmet need. In this regard, DWS would note that the 15,000 Oxfordshire Growth Board unmet need figure was a working assumption to be refined once Oxford City had published its Plan.
- 1.36 Notwithstanding the precise level of the shortfall arising from Oxford City, Table 1.6 demonstrates how making provision for an increased level of dwellings would achieve the requirements of the Housing & Growth Deal:

Table 1.6: Turley Assessment of Planned Housing across Oxfordshire 2011 - 2031

Authority	Planned Housing (2011 – 2031)			Total
	Own Requirement	Oxford City's Need	Additional	
Cherwell	22,840	4,400		27,240
Oxford City	7,836			7,836
South Oxfordshire	15,500	4,950		20,450
Vale of White Horse	20,560	2,200		22,760
West Oxfordshire	13,200	2,750		15,950
			5,764	5,764
Total	79,936	14,300	5,764	
Total				100,000

- 1.37 It is also essential that this increased level of housing is reflected in the Development Plan as a 'requirement' and not simply by identifying additional sources of supply which might collectively be able to deliver the requirement. There are a number of reasons for this. Firstly, simply identifying additional sources does not mean that there is certainty that these sites will be delivered. Secondly, the Growth Deal provides planning freedoms and flexibilities which reduce the policy requirement when considering housing supply and delivery. It is essential that the calculation of housing land supply and the Housing

Delivery Test is undertaken against a requirement which is capable of helping to achieve the 100,000 homes required by 2031.

- 1.38 Without these modifications we consider the Plan is currently unsound on the basis it is not positively prepared, effective nor consistent with national policy.