



MATTER 2: Objectively Assessed Needs for Housing and Employment Land

22 - 24 September 2015

Vale of White Horse Local Plan 2031: Part1 - Examination

HEARING STATEMENT on behalf of Arnold White Estates Ltd

Project reference	GP 006	Date	5 August 2015
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1.0 INTRODUCTION

- 1.1 This is a Hearing **Statement** submitted to the Inspector holding the Part 1 Examination of the Vale of White Horse **Local Plan 2031 (LP)** in September 2015. It is submitted by Gardner Planning Ltd (**GPL**) on behalf of Arnold White Estates Ltd (**AWEL**) which is a development promoter with land interests in The Vale of White Horse (**VWH**) District. GPL/AWEL made a detailed response to the Local Plan Publication Version in December 2014.
- 1.2 This Statement responds to the Inspector's initial questions in order to inform the Examination and as a starting point to the round-table hearing session.

2.0 QUESTION 2.1

Is the identified objectively-assessed need for housing of 20,560 new dwellings (an average of 1028 per year), as set out in policy CP4, soundly based and supported by robust and credible evidence? In particular:

(a) Are the SHMA's demographic adjustments to the 2011 CLG Household Projections soundly based?

- 2.1 The 2011 based CLG Projections (10 years)¹ project growth in households for VWH alone to be 388 p.a. The figures for housing numbers are slightly higher (404 or 4%) to allow for vacancies and second homes. It is agreed that these figures are the 'starting point'.
- 2.2 The VWH SHMA increases that to 468 homes p.a. for VWH for 'demographic' reasons². It postulates that past household formation has been constrained by lack of housing and economic conditions leading to potential new household living with parents or sharing.
- 2.3 There is no obvious reason to challenge that degree of uplift for demographic reasons for VWH, but it is false to consider only the self-generated needs of the District. The CLG 2011 based Projections for Oxford actually show a decline in households of 2.5%³ 2011 - 21, which seems curious. For the HMA the 2011 based CLG projections show a 7% increase 2011 - 21. The HMA SHMA adjusts that (demographics) to an increase over 20 years to 2031 of 26.4% for Oxford and

¹ HOU01.2 Fig 6

² SHMA for VWH non-technical summary para 4.11

³ SHMA for HMA NTS Fig 6 P13

21.4% for the HMA⁴. Such a degree of difference casts doubt on the robustness of the projections.

(b) Is it appropriate to include an allowance for addressing past shortfalls in the delivery of housing against the South East Plan housing requirements?

- 2.4 The VWH SHMA acknowledges that there has been a serious shortfall in delivery for VWH of 801 homes 2006 - 11.⁵ This is based on SEP figures of 578 p.a. - completions 2,089, requirement 2,890 (2006/7 - 2010/11)⁶. However, the SEP was revoked in 2013 and the 578 figure was derived well before the SEP was adopted in 2009 (say 2006?). Clearly modelling has moved on since then and if the OAN for VWH is now 1,028 p.a. then an earlier requirement of about half of that is highly questionable, even the 1,028 figure already includes a small allowance for a shortfall.
- 2.5 Table 1 in the April 2014⁷ document shows completions of 4,120 in the 9 years up to 2014/15. At 578 p.a. that would be a shortfall of 1,082; at a level of need of 1,028 p.a. (9,252 for 9 years) that is a shortfall of 5,132 homes (at March 2015) - just to catch up. So a Plan total of 20,560 (2011 - 2031) seems to be short by some 2,250 homes (the pre-2011/12 shortfall at the OAN of 1,028 not 578).

(c) Is the SHMA's adjustment to take account of forecast economic growth as set out in the Cambridge Econometrics/SQW report soundly based?

(i) Are the report's forecasts of employment growth in the District realistic?

(ii) Is there evidence that the forecast employment growth would give rise to demand for new housing within the Vale of White Horse district?

- 2.6 VWH SHMA NTS⁸ February 2014 paragraphs 4.23 to 4.31 describe an extensive process of evaluation of future jobs growth. This begins with an increase of 10,600 jobs between 2011 - 2031 in the District⁹ which grows to 23,000 jobs to accommodate "*committed economic growth projects*"¹⁰.

⁴ ibid Fig 7 p14

⁵ HOU01.1

⁶ VWH Assessment of 5 Year HLS April 2014 - not in Library

⁷ ibid, T1 p3 extract at Appendix 1 to this Statement

⁸ HOU01.1

⁹ SHMA NTS VWH February 2014 para 4.27

¹⁰ ibid para 4.28

2.7 To provide a comparison, the main Oxfordshire SHMA states that jobs growth in Oxfordshire represents 1% p.a. 2011 - 31, compared to 1.7% p.a. 1981 - 2000, and 1.2% in Cambridgeshire 1990 - 2011.¹¹

2.8 Housing provision for VWH 2011 - 2031 is 20,560¹² compared to jobs growth of 23,000¹³. Jobs growth for Oxford is predicted to be 88,200 - 2011 - 2031¹⁴ - but only 28,000 homes to be provided¹⁵, of which Oxford has capacity for 10,212¹⁶. There seems to be no explanation for these different jobs/homes levels for VWH and Oxford, and no provision for housing the 70,000 Oxford workers that cannot be housed in the city.

(d) What are the implications of the 2012-based CLG Household Projections for the objectively-assessed need for housing?

2.9 The 2011 based projections (10 years) have now been updated by 2012 based projections (20 years) but both project growth in households, based on VWH figures alone, to be some 400 p.a.

3.0 2.2 Is the identified need for 13 additional pitches for gypsies and travellers (CP27) soundly based and supported by robust and credible evidence?

3.1 No comments

4.0 2.3 Is the identified need for 219 ha of land for future employment development (policy CP6) soundly based and supported by robust and credible evidence?

4.1 The URS Vale of White Horse Employment Land Review Addendum 2014 appears to have looked at each potential site and demonstrated that the sites and their areas will accommodate 23,000 jobs.

¹¹ SHMA NTS Oxfordshire March 2104 para 3.37

¹² VWH LP Core Policy 4 p38

¹³ ibid para 4.24

¹⁴ SQW/CE Table 52 p35 ECO02

¹⁵ SHMA Summary Oxfordshire March 2014 Fig 15 p24 HOU01.2

¹⁶ Oxford Housing Land Availability and Unmet Need Assessment Dec 2014 Table 11 p52 Appendix 2 to this Statement



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Appendix 1 VWH Assessment of 5 Year HLS April 2014

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd



**Vale
of White Horse**
District Council



Help us Shape the Future

Vale of White Horse District Council Assessment of Five Year Housing Land Supply

Your Vale - Your Future

April 2014

Vale of White Horse District Council

Assessment of Five Year Housing Land Supply, April 2014

Summary

- i. The adopted Local Plan 2011 is based on the former South East Plan requirement of 578 homes per annum. Against this requirement the district has 5.2 year supply of housing land including 20% buffer as at 30 September 2014. This represents a very significant improvement on the 2012 position of 2.8 years supply.
- ii. Within the planning commitments pipeline the Council granted planning permissions for 2,045 additional homes, and has resolved to grant permission for a further 4,324 homes, subject to the signing of s106 planning obligation legal agreements. This is a very significant and positive response to the requirements of the NPPF in a predominantly rural district.
- iii. The Oxfordshire Strategic Housing Market Assessment 2014 is a material consideration and whilst untested at examination it identifies an objectively assessed need (OAN) for 1,028 homes per annum in the district 2011-2031, including backlog and all appropriate adjustments.
- iv. The emerging Local Plan 2031 Part 1: Strategic Sites and Policies is published for pre-submission public consultation. It demonstrates a five year housing land supply for the period 2015-2020 and each of the following five years, based on SHMA OAN including a 20% buffer.
- v. Calculating five year supply in 2014 based on the untested SHMA OAN, and excluding the emerging plan site allocations being put forward to address it, the district has 3.1 years housing land supply including 20% buffer as at 30 September 2014.
- vi. In the period 2015/16 with the inclusion of the strategic site allocations in the draft Local Plan 2031, we estimate that we will have 5.8 years of housing land supply.

Introduction

1. The National Planning Policy Framework (NPPF) require local planning authorities to *“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements”*, including an appropriate buffer¹. The NPPF states that:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites”.²
2. To meet requirements directed by the NPPF, this document sets out Vale of White Horse District Council’s housing land supply position at April 2014.

Existing and Emerging Housing Requirements

3. The adopted Vale of White Horse Local Plan 2011 was prepared in the context of the now revoked South East Plan³ which required that the Vale of White Horse District deliver a total of 11,560 net additional homes between April 2006 and March 2026 (equivalent to an average annual requirement of 578 homes).
4. To inform emerging Local Plans in the Housing Market Area an Oxfordshire Strategic Housing Market Assessment (SHMA) was prepared for all the local authorities in Oxfordshire and published in April 2014. For the Vale of White Horse the SHMA identified a full objectively assessed need (OAN) of 20,560 net additional homes between April 2011 and March 2031 (equivalent to an average annual requirement of 1,028 homes).
5. In accordance with the Planning Practice Guidance, OAN figures identified through the SHMA are a material consideration for the determination of planning applications. Any weight afforded to the OAN figures should also take into account the fact they have not been tested at a Local Plan examination.
6. The housing target for the district over the emerging plan period is a matter to be determined through the plan making process. To address the full OAN figure identified by the SHMA, Vale of White Horse District

¹ National Planning Policy Framework, para.47

² National Planning Policy Framework, para.49

³ From 25 March 2013 under Statutory Instrument No. 427 (2013)

Council is preparing a Local Plan 2031 Part 1: Strategic Sites and Policies. The emerging plan sets out how the objectively assessed need for housing in the district will be met in full and identifies the proposed locations for strategic housing development up till 2031. The Local Plan has been published for pre-submission public consultation and will be submitted for examination in February 2015.

7. The emerging Local Plan is also a material consideration for the determination of planning applications. The weight that can be attached to the emerging Local Plan increases as it progresses, subject to the extent of support for emerging policies.
8. For the purpose of the housing land supply assessment, the Council will examine housing requirements both under the revoked South East Plan and the untested full OAN identified in the SHMA.
9. Table 1 below summarised the number of net additional homes completed in the district since April 2006.

Table 1 – Past housing completions and requirements

	Annual	Based on the South East Plan 578 homes per annum			Based on SHMA OAN 1028 homes per annum		
		Accumulated completions	Accumulated requirements	Accumulated balance ^	Accumulated completions	Accumulated requirements	Accumulated balance ^
2006/07	538	538	578	-40	n/a	n/a	n/a
2007/08	458	996	1,156	-160	n/a	n/a	n/a
2008/09	323	1,319	1,734	-415	n/a	n/a	n/a
2009/10	436	1,755	2,312	-557	n/a	n/a	n/a
2010/11	334	2,089	2,890	-801	n/a	n/a	n/a
2011/12	376	2,465	3,468	-1,003	376	1,028	-652
2012/13	326	2,791	4,046	-1,255	702	2,056	-1,354
2013/14	548	3,339	4,624	-1,285	1,250	3,084	-1,834
2014/15*	781	4,120	5,202	-1,082	2,031	4,112	-2,081

Notes:

* Projected completion figures for 2014/15.

^ Accumulated balance is the sum of completions against the requirements for Vale.

10. The NPPF indicates that a buffer must be included in the assessment of the 5 year housing land supply, this buffer should normally be 5% of the total 5 year housing land requirement but where there has been a persistent record of under delivery, the buffer should be 20% of the total 5 year housing land requirement. Based on past performance of housing delivery in the district, an additional 20% requirement will be



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Appendix 2: Oxford Housing Land Availability and Unmet Need Assessment Dec 2014 Table 11 p52

Vale of White Horse Local Plan 2031: Part1 - Examination

GPL on behalf of Arnold White Estates Ltd



Oxford's Housing Land Availability and Unmet Need Assessment

December 2014

Stage 4: Assessment Review - Summary of Results

- 166.** Appendix A lists all sites assessed as part of the SHLAA with a conclusion about the suitability and availability of each site in terms of potential development for housing. For sites which have been assessed as suitable and available, an indication of the number of dwellings achievable on each site is shown and the expected timescale for delivery in Appendix B.
- 167.** As well as suitability and availability, sites must also be viable to be judged as achievable for housing delivery. Individual viability assessments for each site have not been carried out as existing evidence demonstrates that the majority of sites in Oxford City are viable, and for those where the landowner can demonstrate unviability, the Council can be flexible in applying Affordable Housing requirements to allow a site to become viable. Instead, a typology approach has been applied to indicate the likely viability.
- 168.** In summary, the housing potential from all sites which have been assessed as suitable, available and achievable is **6,422** dwellings. In addition, there is an estimated windfall of **180** dwelling per year. Windfalls are excluded from 2011/12 - 2013/4 to avoid double counting of completions. Windfalls are also excluded from 2014/15 to avoid double counting of existing small site commitments likely to be completed in 2014/15. Windfalls are therefore only counted over a 16 year period from 2015/16 – 2030/31. With an estimate of 180 windfall dwellings per year this equates to **2,880** dwellings.
- 169.** Housing completions for years 2011/12, 2012/13 and 2013/14 were 228, 213 and 70 respectively totalling **511** dwellings. Student accommodation completions over the same period equate to **104** dwelling completions and C2 completions equate to 33 dwellings. Small site commitments at 31st March 2014 total **262** dwellings. The total capacity for 2011-2031 is therefore **10,212** dwellings.

Table 11: SHLAA summary table

Housing Supply 2011/12 to 2030/31	Reference	Dwellings
Total potential housing from identified sites (including residential, student and C2)	<i>Appendix B</i>	6,422
Windfall dwellings 2015/16 to 2030/31	<i>Stage 3</i>	2,880
Completions 2011/12 to 2013/14		648
<i>Housing</i>	<i>AMR 2014</i>	<i>511</i>
<i>Student accommodation (equivalent dwellings)</i>	<i>Table 9</i>	<i>104</i>
<i>C2 residential care home (equivalent dwellings)</i>	<i>Stage 3 and Table 10</i>	<i>33</i>
Small site commitments extant at 31 st March 2014		262
<i>Housing</i>		<i>252</i>
<i>Student accommodation (equivalent dwellings)</i>		<i>10</i>
<i>C2 care homes</i>		<i>0</i>
Total supply		10,212