

Stage 2 Matters and Questions**Matter 11 – Five Year Housing Land Supply (11.1 and 11.2)**

The emerging Local Plan at Core Policy 4 states that the VoWH will deliver at least 20,560 new homes over the period 2011-31, equating to 1,028 per annum. The starting point for calculating the 5 year housing land supply for VoWH is therefore 1,028 new homes x 5 years = 5,140.

Buffer

Para. 47 of the NPPF states that when calculating five year housing land supply, a 5% buffer should be added to ensure choice and competition in the market for land or 20% if *'there has been a record of persistent under delivery of housing'*. Para. 25 of the December 2011 VoWH Annual Monitoring Report states that *'since the start of the current Plan period in 2006 (current adopted Local Plan), we have completed 2,082 dwellings or an average of 417 homes per year. This is lower than our annual target of 578 homes per year'*. Looking at the accompanying Figure 6, it is evident that over the five year period 2007/08 to 2010/11, the Council did not meet or exceed their 578 homes per annum housing target in any single monitoring year.

As we will expand upon below, the Council has also failed to deliver the annual housing delivery target of 1,028 units per annum as contained in the emerging Local Plan from the start of the new Plan period being 2011/12 up to the most recent monitoring year being 2014/15. As the Council has therefore failed to achieve their housing delivery target in any of the last eight years, it is indisputable that the VoWH has a record of persistent under delivery of housing and therefore the 20% buffer should apply to five year housing land supply calculations.

Historic Shortfall

Having regard to Figure 3.4 on pg. 68 of the VoWH *'Topic Paper 4 – Housing'* (ref. TOP04), the Council achieved the following completions over the first four years of the Plan period:

2011/12 = 376 (-652)

2012/13 = 326 (-702)

2013/14 = 548 (-480)

2014/15 = 781 (-781)

Over the first four years of the Plan period, the VoWH accrued a shortfall of 2,081 units compared with the Local Plan target of 4,112 homes (1,028 x 4 = 4,112 – 2,031 = 2,081). The VoWH therefore only managed to deliver approximately 50% of the new homes required.

When applying historic delivery shortfalls to five year housing land supply calculations, the NPPG is clear that *'Local Planning Authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'*. Given the availability of unconstrained land outside the Green Belt and AONB, such as at Stockham Farm, west of Wantage, we do not consider that it is justified to apply the 'Liverpool' rather than 'Sedgefield' methodology as the NPPG is clear that it is incumbent upon Local Authorities to deal with any undersupply as soon as possible. This is particularly important as historic undersupply represents 'real' unmet housing need which is currently impacting

upon affordability, affordable housing delivery and household formation rates if it remains unaddressed.

The housing shortfall of 2,081 units over the first four years of the Plan period should therefore be added to the five year housing land requirement – $1,028 \times 5 = 5,140$ plus 20% = 6,168 plus 2,081 = 8,249. Please note that the 20% buffer has not been applied to the historic shortfall which has accrued from the start of the Plan period in 2011/12 and therefore the 8,249 represents a 'best case' scenario from this perspective.

Conclusions

The five year housing land supply calculation for the VoWH is therefore as follows:

- Annual housing target in Core Policy 4 of the emerging Local Plan = 1,028 p/a;
- Annual housing target multiplied over the next five years = $1,028 \text{ p/a} \times 5 = 5,140$;
- Five year housing target including the 20% NPPF buffer = $5,140 \times 20\% = 6,168$;
- Five year housing target, plus 20% buffer plus historic under delivery applying Sedgfield = $6,168 + 2,081 = \mathbf{8,249 \text{ or } 1,650 \text{ p/a}}$.

Figure 34 on pg. 68 of the VoWH '*Topic Paper 4 – Housing*' (ref. TOP04) sets out the Council's housing delivery trajectory for the next five year period 2015/16 to 2019/20 which is as follows:

- 2015/16 = 1,123;
- 2016/17 = 1,325;
- 2017/18 = 1,907;
- 2018/19 = 1,931;
- 2019/20 = 1,761.

It is notable that the emerging Local Plan looks to achieve a significant increase in housing delivery rates which represent three times the completion rate experienced during the first two years of the Plan period (2011 – 13) and over double the completion rate experienced during the previous two years of the Plan period (2013 – 15). Taking these projected completions purely at face value, it is evident that the VoWH cannot currently demonstrate a five year housing land supply:

- Total projected VoWH housing completions 2015/20 = 8,047;
- Five year housing land supply requirement = 8,249;
- Five year housing land supply shortfall = **-202**.

Whilst the Council cannot currently demonstrate a five year housing land supply, we do concur with their strategy to allocate a large number of sites of different sizes, dispersed across the District, in order to ensure that housing supply does come forward should one or more sites experience delivery delays. However, we do have two specific concerns regarding the housing completion projections included in Figure 34 on pg. 68 of the VoWH '*Topic Paper 4 – Housing*' (ref. TOP04):

- (1) There are a number of sites where housing completions are projected to occur within unrealistically short timescales:

- (a) Grove Airfield which, whilst benefitting from a resolution to grant outline planning permission dating from December 2013, still does not have a completed Section 106 legal agreement. Assuming that the Section 106 legal agreement is signed imminently, the planning application remains in outline form only and it would realistically take a minimum of 18 months for the first house to be completed given timescales to approve Reserved Matters, pre-commencement Conditions, infrastructure provision and site preparation. This would push at least 263 dwellings beyond the current five year housing land supply monitoring period with the first completions likely commencing from mid 2017 at the earliest;
 - (b) Crab Hill which, although benefitting from outline planning permission dating from 13th July 2015, remains under the control of the site promoter, Land Improvement Holdings (who do not directly develop) and has yet to secure a developer / house builder to take the site forward. Given that the site currently has no active developer / house builder control, and the timescales associated with approving Reserved Matters and pre-commencement Conditions, it is considered unrealistic to assume any completions until at least the latter part of 2017. This would push at least 225 dwellings beyond the current five year housing supply monitoring period;
 - (c) All emerging Local Plan Part 1 strategic housing allocations are envisaged to begin completing dwellings during 2017/18. As the Local Plan is not expected to be formally adopted until mid-2016 at the earliest, it is considered unrealistic to assume that all strategic housing sites will simultaneously submit and secure planning permissions and commence development, with all Reserved Matters, pre-commencement Conditions and site infrastructure / preparation works completed, within a period of little more than 12 months. Taking recent large scale housing sites as an example, it took almost two years for Crab Hill to receive planning permission from validation (validated August 2013 – Decision Notice issued July 2015) and it has taken over two years for Grove Airfield to move from resolution to grant outline planning permission to a Decision Notice being issued which remains pending. At the very least, it is considered that any completions from emerging Local Plan strategic housing allocation sites should be pushed back to 2018/19 which would see 1,195 homes moved out of the current five year housing land supply period.
- (2) Looking at past completion rates on a range of different sized sites within Figure 34 on pg. 68 of the VoWH *‘Topic Paper 4 – Housing’* (ref. TOP04), it is evident that, with the exception of the former Tree Nursery and Cricket Club site in Great Faringdon, the experienced maximum yearly completions are generally in the region of 50-75 units for larger sites. As an example, Dandara Ltd secured planning permission for 380 new homes on land at Stockham Farm in Wantage which are currently under construction and completing at circa 50 per annum. This site is in immediate proximity to Grove Airfield and the 50 completions per annum represents the level of take-up within a market which, with Grove Airfield and Crab Hill yet to commence construction, is relatively uncompetitive. We see no evidence that Crab Hill, Grove Airfield and Harwell will be able to oversee completions of between 150-200 dwellings p/a each which is unrepresentative of experienced completion rates within the VoWH at a time when the housing market was strongly recovering and housing supply was limited. It is considered that maximum completion rates on the larger sites of 100 units per annum are more realistic and evidenced.

In conclusion, based on the above, we consider that the total projected VoWH housing completions over the next five year period being 2015/20 should reduce from 8,047 as set out in the VoWH *'Topic Paper 4 – Housing'* (ref. TOP04), to a more realistic 6,364 (- 263 for Grove Airfield, - 225 for Crab Hill and – 1,195 for emerging Local Plan strategic housing allocations) which would lead to a five year housing shortfall of -1,885 giving the Authority a 3.9 year supply.