



**WEST OXFORDSHIRE
DISTRICT COUNCIL**

EXAM 011

West Oxfordshire District Council

Additional Paper - Preferred Option in Absence of Five Year Land supply

1. Introduction

- 1.1 This paper has been prepared by West Oxfordshire Council at the request of the Inspector, Malcolm Rivett. It arises from discussions at the Stage 2 Hearings into the West Oxfordshire Local Plan which were held between 9 and 19 May 2017. In particular, discussions on Matter 6.6 relating to whether there is a five year supply of specific, deliverable housing sites and, if not, what would be the most appropriate way forward for the Local Plan.

2. Five Year Supply Position

- 2.1 The Council maintains its view that there is a five year supply of specific, deliverable housing sites. The latest position is set out in the Housing Land Supply Position Statement – May 2017 (HOU21), which demonstrates that the Council has a 5.85 year supply of deliverable housing sites when set against a 5-year requirement using the Liverpool (residual) methodology and applying a 5% buffer i.e. a supply of 5,258 homes against a requirement of 4,496 homes and assuming Oxford's unmet needs are met after 2021.
- 2.2 There are alternative approaches to establishing the housing requirement, notably by adopting the Sedgefield approach to dealing with backlog, applying a higher level of buffer and making different assumptions about when Oxford unmet needs should be addressed. The Council's position on these alternatives, and an explanation why the approach taken by the Council remains sound, is set out in its Hearing Statement for Matter 16 on the Five Year Supply of Deliverable Land, which is due to be discussed at the Stage 3 Hearing Session on Thursday 20 July.

3. Options in absence of five year land supply

- 3.1 Notwithstanding the updated land supply position set out above, if the Inspector concludes that there is not an adequate supply of specific deliverable housing sites there are a number of possible approaches which the Council could take. The appropriateness of each option will, to a certain extent, depend on the scale of the perceived shortfall.
- 3.2 In developing these options, the Council is very mindful of the need to ensure that a plan is in place as soon as practicable to provide certainty for the development management process and thereby facilitate houses actually being built. It is concerned that prolonging the plan-making process with a further stage of site evaluation to identify additional sites, along with the associated Council decision making processes and public consultation that this would entail, could delay the eventual adoption of the plan by up to a year.
- 3.3 If the shortfall is relatively modest – say in the order of a few hundred homes – the Council's preferred approach would be to review and update the housing land supply position taking account of, firstly, planning consents since May 2017 and, secondly, the feedback from site promoters in response to the Request for Information on 5 Year Housing Land Supply (EXAM1) which arose out of the Stage 2 Hearings in May. A summary table setting out responses to this request are set out in EXAM009.
- 3.4 In broad terms, the responses from site promoters demonstrate a more positive view of the five year land supply position – principally due to more optimistic assumptions about likely build out rates compared to the Council's position, especially where sites are now being

developed by a number of developers. These are particularly evident in the responses from developers of larger sites such as Tank Farm (Chipping Norton), North Witney and East Witney.

- 3.5 In total, reassessing the 5 year land supply in light of the responses from site promoters could add up to 1,000 dwellings to the five year land supply, if their assumptions are considered to be realistic. Combined with a review of recent planning consents, this would be the Council's preferred approach to address any modest shortfall in the five year housing land supply.
- 3.6 If the shortfall is more significant - say in the order of 1,000 homes or more - as a result of a more pessimistic view of the delivery of the sites currently identified as making up the five year land supply, or following an indication that an alternative approach to determining the housing requirement is more appropriate and resulting in an even higher five year requirement, then an alternative approach may be required.
- 3.7 In these circumstances, the Council considers that there are two potential options and a third option which is a hybrid of the other two options.
- 3.8 One option would be to amend the approach to the overall housing requirement to reflect that the Local Plan allocates a significant number of large strategic sites and that, due to lead in times, many of the land allocations will not come forward until the latter part of the plan period. A staged or stepped approach to the housing requirement for the District as a whole would therefore be justified and appropriate. Under this approach the West Oxfordshire requirement would remain as 13,200 homes, but the annual requirement up to 2021 could for example be reduced to 600 dwellings per annum with a consequent increase in the annual requirement post 2021 to 720 dwellings per annum. This would complement the approach adopted for Oxford City's unmet housing need, and also recognise that housing delivery in the early part of the plan period was significantly lower than now proposed in the Local Plan.
- 3.9 An alternative option would be to identify further land allocations to add to the housing land supply. Due to the lead-in times associated with additional large strategic sites, these are most likely to be smaller non-strategic allocations or extensions to existing sites. Only sites which are readily available and capable of early delivery would have any significant impact on the five year housing land supply position. There is a risk, however, that these could prove to be in less sustainable locations than the proposed strategic allocations and therefore they could distort the spatial strategy of the plan, and the build out on smaller sites could threaten delivery on the larger sites.
- 3.10 There are two potential sources of additional sites. Firstly, sites which were identified as potential non-strategic allocations when the Modifications to the Local Plan were being prepared, but were not subsequently allocated in the Modifications to the Local Plan published in November 2016. These are the "grey" sites which are listed in the Local Plan Site Selection Paper- June 2017 (EXAM007). Secondly, the feedback from site promoters in response to the Request for Information on 5 Year Housing Land Supply (EXAM1) includes a list of sites proposed by site promoters – some have already been identified through the SHEELA and are therefore known to the Council, others have been raised at the Local Plan Examination Hearings, and others are entirely new sites.

- 3.11 Clearly, if the Council was to follow the additional allocation route, this would require a substantial review and assessment of all the potential additional sites including sustainability appraisal of reasonable alternatives. Furthermore, proposals to allocate further sites would be subject to full Council discussion and approval, followed by full public consultation. This in turn, could lead to further examination hearing sessions, further delaying the potential final adoption of the Local Plan.
- 3.12 In the Council's view, this approach would not only prolong the uncertainty about the five year land supply position and increase the risk of planning by appeal with sites being granted planning consent in less sustainable locations, it would also increase uncertainty for the substantial number of sites that are already allocated in the Local Plan and have the potential to deliver housing in the next five years. It would also put at risk plans to secure delivery to meet the pressing unmet needs of Oxford, particularly for affordable housing. The net result of this continuing lack of certainty could potentially mean that fewer dwellings would be constructed, contrary to the aims of the NPPF to boost housing supply.
- 3.13 A third option would be a hybrid approach, which combines a staged approach to the housing requirement with the addition of further sites. In the Council's view, such a hybrid option would be helpful in some respects, in terms of providing more definitive policy guidance on housing requirements in the latter part of the plan period, but this would have to be set against the serious drawback of delay to plan adoption.
- 3.14 For these reasons, therefore, the Council concludes that its preferred approach, if a five year housing supply is not available, and the shortfall is modest, would be to review the housing land supply position in light of the latest information on planning consents and the information provided by developers about key build out rates on existing committed sites. If the shortfall was deemed to be more substantial, the Council's preferred approach would be to adopt a staged approach to the housing requirement.