Our Ref: SCB/5035

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Planning Policy
South Oxfordshire District Council
Benson Lane
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Dear Sirs

SOUTH OXFORDSHIRE CORE STRATEGY EXAMINATION - COMMENTS UPON THE NPPF

SUBMITTED ON BEHALF OF BLOOR HOMES (NORTHAMPTON) LTD AND HALLAM LAND MANAGEMENT LTD

We refer to email correspondence received from the Programme Officer requesting any comments upon the NPPF to be submitted by 14 May 2012 and our comments are set out below.

The NPPF sets out a presumption in favour of sustainable development and paragraph 7 identifies that there are 3 dimensions to sustainable development, comprising (i) Economic, (ii) Social and (iii) Environmental.

Paragraph 156 emphasises that this presumption relates both to meeting the needs for homes and jobs (bullet 1), together with other forms of development.

We believe that greater emphasis is put on the need to provide for the housing needs of a Plan area in the NPPF.

The NPPF makes it clear at paragraph 47 that LPAs should, inter alia, boost significantly the supply of housing and use their evidence base to ensure their Local Plan meets the full objectively assessed needs for market and affordable housing. The second bullet point of the paragraph also introduces a change whereby an additional 5% or 20%
above the 5 year supply (see further comments on this matter below) is now required to ensure that housing provision targets are met.

Paragraph 50 also requires LPAs to plan for a mix of housing based on current and future demographic trends.

Paragraph 159 requires LPAs to use an appropriate evidence when preparing Local Plans and to prepare a Strategic Housing Market Assessment ("SHMA") to assess their full housing needs and to work with neighbouring authorities where housing market areas cross administrative boundaries. The paragraph further adds that the SHMA should identify the scale and mix of housing likely to be needed over the plan period to address the need for all types of housing.

Against the above background, whilst it is important to retain the SEP target as a minimum to be met in the period to 2027 (given that the South East Plan remains part of the Development Plan), the evidence base, including the Council's own Housing Needs Assessment, identifies a level of need totalling 1,413 dwellings per annum (530 affordable and 883 market dwellings). This further emphasises the need to plan for housing growth now and to ensure the early delivery of housing allocations.

Given the high level of housing need identified by the evidence base to the CS (noting in particular the high level of affordable need) the components of supply relied upon by the LPA must be demonstrated to be deliverable/developable at the point envisaged. However, there is no contingency in the CS that could otherwise take up any slack in the event that the identified components of supply fail to come forward at the point envisaged. This is particularly the case in the larger villages where it is suggested at the proposed footnote to Table 7.3 (Planned Housing Provision in the Rest of District) that the 1,154 dwellings at the larger villages should be divided so that at least 500 are provided at larger villages in the Central Oxfordshire ("CO") Sub-area.

As matters stand, and in relation to the most up to date LDS, we have a great concern in relation to the timetable for preparation of the Site Allocations DPD and the timetable for the delivery of housing opportunity and choice at the larger villages.

Given the identified need for housing (including that identified in the SHMA), the Inspector should seek the early preparation of the Site Allocations DPD in order to supplement the strategic sites relied upon the CS should they fail to come forward at the rate/point envisaged. This is particularly important given the high level of affordable housing need that exists at the larger villages. Accordingly, it should be a key objective of the CS to encourage and facilitate sustainable sites to come forward at these locations and the wording of the CS should be revised to enable such development to come forward along the lines of the following:

"Where sustainable development proposals come forward in the Larger Villages ahead of the SA DPD that would assist in addressing the needs identified in the SHMA, they should be viewed favourably when considered against the general strategy for the Larger Villages and other policies of the CS"
As to housing delivery, and the application of a 5 or 20% buffer, we have considered the annualised supply positions in SODC from 1996 to 2011 (a 15yr period) and compared the annual strategic requirement (based on relevant Structure Plan and SEP policy with actual completions achieved in the plan period). Our assessment shows that over this period the average requirement figure of 524pa has been ‘undershot’ with an average of only 340 dwellings being achieved per annum. The requirement during this period was for the delivery of 7,900 dwellings, although actual completions only resulted in some 5,100 dwellings – a shortfall of 2,800 dwellings and a deficit of 35%.

The past history of under-performance represents a significant backlog in unmet housing need and provides further justification for release of additional sites now in order to meet the manifest shortfall in housing delivery, particularly within the South Oxfordshire sub-region. Together with the accumulated shortfall, this demonstrates a record of persistent under delivery whereby, in accordance with the NPPF (para 47), SODC should increase their five year buffer to 20%.

Finally, in relation to windfalls, it is clear from paragraph 48 of the NPPF that LPAs can only make an allowance for windfall sites in their assessment of the five year supply position if there is compelling evidence that such sites have consistently become available. However, any such windfall assessment should not include residential gardens. This qualification in the NPPF severely restricts the potential windfalls sources of supply and moreover, any such sites should ideally be identified in the SHLAA. On this basis, we do not accept that there is a case for making an allowance for windfall sites in the first five years.

We trust the above comments are of assistance in assessing the soundness of the Core Strategy.

Yours faithfully

[Signature]

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