

## **Vale of White Horse Local Plan 2031**

### **(Part 1 Strategic Sites and Policies)**

#### **Stage 1 Examination**

**Matter 2 – Objectively assessed needs for housing and employment land**

**Statement on behalf of Commercial Estates Group**

## 1 Introduction

- 1.1 This statement is submitted to the Examination into the Vale of White Horse Local Plan on behalf of Commercial Estates Group (hereafter referred to as CEG). CEG is promoting the whole of the draft North Abingdon-on-Thames strategic site allocation for around 800 dwellings.
- 1.2 This statement refers to Matter 2 - Objectively assessed needs for housing and employment land, and the matters and questions identified by the Inspector in his 'Matters and Questions for the Stage 1 Examination'.

## 2 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 Yes. The objectively assessed housing need set out in CP4 reflects the findings of the SHMA for the Oxfordshire Sub-Regional Housing Market. It has been prepared by a consultant team comprising GL Hearn, Justin Gardner Consulting and SQW on behalf of the local authorities falling within the housing market area, namely West Oxfordshire District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and Cherwell District Council.
- 2.2 The SHMA has been prepared taking account of both the 2007 SHMA Guidance and the National Planning Practice Guidance on Housing and Economic Assessments.
- 2.3 Government guidance (NPPG para 015) states that household projections published by DCLG should provide the starting point estimate of overall housing need. However it recognises that these may require adjustment to reflect factors affecting local demography and household formation rates.
- 2.4 We consider the demographic adjustments made to be soundly based as explained in the SHMA and note that the Council's Statements to this Hearing will provide further explanation and discussion. We further note that the objectively assessed housing needs as identified in the SHMA were accepted by the Inspector considering the Cherwell Local Plan in June 2105.

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

- 2.5 Yes. Para 015 of the NPPG states that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. *The assessment*

***will therefore need to reflect the consequences of past under delivery of housing*** (writer's emphasis).

2.6 The SHMA assesses past delivery performance against South East Plan (SEP) figures for the 2006/7- 2010/11 period; given that the SEP included past backlog in determining the housing targets therein; and 2011 is the base date of the demographic projections considered in this SHMA. The development of the South East Plan was informed by consideration of household projections as well as wider factors including land availability, with the 2004-based Household Projections considered at the Examination in Public.

**(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?**

2.7 Yes. We consider the adjustments to take account of forecast economic growth to be soundly based and note that the Council's Statements to this Hearing will provide further explanation and discussion.

2.8 The adjustments take into account the present level of employment commitments in the county/housing market area, the very positive prospects for the county's economy, the relevant county and district Strategic Economic Plans, the Oxford/Oxfordshire City Deal (2014) and the objectives of the Local Economic Partnerships involved.

2.9 We further note that the findings of the SHMA in this regard, and the resulting objectively assessed housing needs, were accepted by the Inspector considering the Cherwell Local Plan in June 2105 when he endorsed the '*important policy decision*' of selecting the high-growth option by the relevant Councils as appropriate, reasonable and realistic in the current context.

2.10 He found that the evidence for the very positive economic growth prospects in the county were '*robust and realistic, bolstered by the national economic recovery now underway*'. He recognised that the SHMA has been acknowledged by the relevant Councils as the most suitable and appropriate basis on which to plan for their new housing needs up to 2031.

2.11 He also found that the process was defined and the methods agreed and monitored by all the Councils commissioning the work from independent consultants, at each relevant stage, as being consistent with the requirements set out in the NPPF and appropriate for the task. He was '*fully satisfied*' that the methods used in, and the scenario outcomes arising from, the 2014 SHMA are consistent with the requirements of the NPPF and the PPG.

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

2.12 The following table presents the most recent household projections for Vale of White Horse District. There is a small upward trend.

	1991	2011	2021	2033
2008-based Projections	42,000	-	52,000	57,000
Interim 2011 Projections	42,430	49,781	53,656	-
2012-based Projections	42,431	49,807	53,960	58,454

2.13 In terms of Oxfordshire as a whole, the 2012-based projections present a lower household estimate in 2033 than the 2008-based projections (307,571 versus 313,000).

2.14 The Vale Housing Topic Paper notes that – “looking to the future, The DCLG 2011-based Household Projections predict that from 2011 to 2021 the number of households in the Vale will increase by 7.8% (49,781 to 53,656)”. The latest 2012-based Household Projections predict an 8.3% increase in the number of households.

2.15 The Oxfordshire SHMA 2014 makes use of the Interim 2011 Projections but the difference (as at 2021) is within tolerable limits, at just over 300 households. If anything, the 2012 based projections indicate an increased housing need.

**3 Question 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 CEG has no comment to make in this regard.

**4 Question 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 We support the findings of the Vale of White Horse Employment Land Review Addendum (2014) and the District’s assessed employment needs and agree that demand for employment land in the District is strong for the reasons explained in the Local Plan ‘Meeting business and employment needs’ on page 42.