

Comment

Consultee	Ms Anna Hoare (872452)
Email Address	
Address	Unknown Unknown Unknown
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Ms Anna Hoare
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Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
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Version	0.2
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The OHMA (Hearn 2014) cannot be considered a robust or reliable assessment of projected housing need for the following reasons. The unexamined criterion of 'affordability' is unsustainable as a way of measuring housing need. There is an uncritical assumption that more houses = more affordability. This is not the case in present conditions. The OHMA methodology is excessively simplistic because it fails to examine the structure of ownership, and radical changes in that structure over the past 20 years which now profoundly affect the appearance of housing 'shortages' in the south-east. Empty and/or 'unaffordable' houses and apartments, which are widespread in London, have been converted into tools of an international property investment market, i.e. they no longer function or can be considered as 'housing'. Individual/corporate investors in property constitute an unregulated source of competition

with people who need dwellings. These two markets are thus in opposition, and without proper control of the property investment market, housing 'shortages' will continue to grow incrementally. In short, the claimed 'objective' assessment of the housing market is no such thing. 'Property' and 'housing' are 2 distinct market forms tied up in the same object which, without correct management, always lead to growing divisions of wealth and housing need. This well-known 19th century phenomenon is once again running out of control due to government policies. There is no such thing as an 'objective' assessment of housing markets without taking into account the distinct characteristics of the property market. Under present conditions, the property market is forcing thousands of people away from the capital, where they can no longer 'afford' to live, and this will continue to happen unless steps are taken to return property to its status as housing- which will lead to affordability. The OHMA is unsound because it is based on a highly politicised attempt to (a) shore up an inflated property investment market (as if it were a 'natural' phenomenon,) and (b) generate economic activity through the construction/ housing markets. The Local Plan is probably 'legally compliant' with the fundamentally unsound criteria & methodologies of OHMA, and it is therefore unsound and unjustified for the reasons described.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Population growth through inward migration to Oxfordshire should be measured as a relation to the relative unaffordability of housing in the south-east, and changes (outlined above) in the structure of property in London in particular. A more discerning analysis of housing/property will reveal the relation between so-called housing shortages and the property market. Outward migration from London is not an 'objective' measure of housing need or population increase, it is the inevitable and deliberate effect of policies that encourage property value inflation.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No - I do not wish to participate at the oral examination