

**VALE OF WHITE HORSE LOCAL PLAN 2031**  
**(Part 1 Strategic Sites and Policies)**  
**EXAMINATION**

**Matter 2 – Objectively Assessed Needs for Housing and  
Employment Land**

Hearing on 22-24 September 2015

Representation from Harwell Parish Council

*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?*

Harwell Parish Council asserts that the SHMA is based on a series of questionable assumptions which add up to a total employment forecast which lacks credibility. This employment forecast in turn drives the housing need forecast. Despite being a statement of need, and not a target, the Vale has accepted this number without scrutiny or challenge.

The PC supports the detailed critique of the SHMA prepared by Alan Wenban-Smith on CPRE's behalf, and which will be submitted by CPRE. A summary of his conclusions are presented in an Appendix.

*In particular:*

*(a) Are the SHMA's demographic adjustments to the 2011 CLG Household Projections soundly based?*

No, specifically because of the adjustment to the average household size adding 7,600 houses to the forecast. (Summary para 3, report para 2.18). Other adjustments also make the projections unsound.

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

No, any forecast should be independent of the revoked South East Plan

*(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?*

No. Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and house building rates and it has not been subject to public consultation or independent scrutiny.

Anecdotal evidence from new jobs and housing in Science Vale area is that people buying the houses work outside the district and county, and that new employment is coming from jobs relocated elsewhere in the country, such that the employees continue to commute from their original locations, rather than move to housing within the district.

Whilst this may not remain true for all new jobs and housing, it doesn't appear to have been factored into the SHMA housing and employment forecasts.

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

No comment

*2.2 Is the identified need for 13 additional pitches for gypsies and travellers (CP27) soundly based and supported by robust and credible evidence?*

No comment

*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?*

No comment

## Appendices

### Appendix 1: LPPT1 Submission Version. PC Representation 1 - SHMA

#### Policy

**Core Policy 4** Meeting Our Housing Needs  
& all others that flow from it, in particular, **Core Policies 8, 15 & 20**

#### Legally Compliant

**Yes**

#### Sound (Positively Prepared, Effective and Justified)

**No**

#### DtC Compliant

**Yes**

#### why unsound

Plan is based on exceptionally high forecast of housing need as defined in the controversial Oxfordshire SHMA and supporting evidence base.

The SHMA is based on a series of questionable assumptions which add up to a total employment forecast which lacks credibility. This employment forecast in turn drives the housing need forecast.

Despite being a statement of need, and not a target, the Vale has accepted this number without scrutiny or challenge.

More evidence is provided in the critique commissioned by CPRE Oxfordshire from a leading planning expert who concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

- The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;
- The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire; and
- Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and house building rates and it has not been subject to public consultation or independent scrutiny.

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. The Vale did not attempt to undertake any further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

By the time the Vale plan is inspected, the Cherwell plan will have been reviewed, and Oxfordshire SHMA accepted as an appropriate statement of need and hence setting the district housing target, or it will have been rejected.

#### modification(s) necessary

If the Oxfordshire SHMA is rejected by the Cherwell inspector, then the Vale should withdraw its plan and modify it line with the Cherwell inspector comments.

The SHMA should be reviewed and a revised statement of needs derived, based on Government's official household projections and more credible and realistic employment projections. .

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

## **Appendix 2: Summary of conclusions reached in a detailed critique of the SHMA prepared by Alan Wenban-Smith on CPRE's behalf**

[with acknowledgement to CPRE]

1. The present SHMA is not in accordance with current planning policy, which allows “adjustment of the Government’s published household projections, while the SHMA proposes a wholesale replacement” (2.7). The SHMA figures are in fact more than 2.5 TIMES the official projections.
2. The SHMA replaces the direct national statistics for migration in and out of Oxford City over the last 10 years with a local estimate cobbled together from total population and births/deaths. This is projected forward another 20 years and mostly assigned to extra international migration into the County. Any estimate centred on net migration gains will be volatile because of the large population movements in and out of Oxford, and so unreliable. This “tweak” adds a hypothetical 13,000 houses (2.12).
3. The authors of the SHMA have “adjusted” the projected average household size for Oxfordshire (2.52 in 2011) from the DCLG trend (a decline to 2.47 persons per household by 2031), to a revised (pre-credit crunch) trend figure of 2.41. This alone adds 7,600 houses to the “forecast” (2.18).
4. The SHMA adds the “deficiency in housing delivery” for the period 2006-2011 to the forecast total of housing need, effectively assuming that future growth (‘business as usual’) will wipe out all the effects of the global economic crisis. This adds a further 3,500 houses (2.19).
5. The SHMA draws on plans drawn up by the (unelected) Local Economic Partnership which forecasts 85,000 new jobs in Oxfordshire over the period, and a consequent need for a further 24,000 new houses. But on examination the committed growth scenario is essentially a catalogue of development proposals. It confuses economic development with property development, by assuming that jobs will be created as a direct result of new development, but taking no account of the dynamic processes of job losses and gains that go on in the much larger existing stock of firms and premises. For example it assumes that new shops increase trade and jobs rather than simply moving them around. What is more it brushes aside known future job losses – the departure of JET from Culham (2.29).
6. However the authors of the SHMA actually understate the percentage of affordable housing which would be necessary if their overall numbers were remotely correct, ignoring standard practise on the relation of average household income to affordable housing need (2.31). Affordable housing is of course a burden on developers, and G.L. Hearn, (the SHMA’s authors) who are (according to their webpage) one of the UK’s leading independent property consultancies providing trusted commercial property advice to the public sector, developers, investors and occupiers could be concerned at the impact of large affordable housing obligations on developers including their clients.
7. The SHMA proposes another 15,000 houses as the means of getting more ‘affordable housing’ as by-product, through Planning Obligations. However it is neither valid (nor feasible) to attempt to build additional houses over and above demographic or economic needs already set at

the extremes of probability, simply to secure provision of affordable housing. If such additional housing could be sold, it would be because it was meeting such needs itself.

8. The SHMA does suggest that house building on the scale it proposes would decrease house prices, and thus assist affordability and increase sales in another way. However, the 2004 Barker Report estimated that even a 50% increase in building would price only 5000 additional households (nationally!) into the market after ten years” (3.8). What is more Figure 7 of the consultant’s report shows that even if outputs more than double recent levels were achieved, housing would still become less affordable not more.

9. This is partly because house prices are set not by new build but by the sale of existing properties (known as ‘churn’) and because much of the land market takes the form of option agreements between landowners and builders and incorporates a house price expectation (3.21).

10. For all these reasons the SHMA is likely to be grossly overstated, by a multiple of over 2. Allocations of housing land made in response to it will have the effect of giving builders carte blanche in their choice of which sites to develop to meet actual levels of demand (3.30).

11. Builders will choose to develop only the easiest and most profitable sites. Green field sites are easier to develop and therefore preferred by builders, so a large increase in provision inevitably means changing the successful brownfield first policy to “Greenfield First” (3.31a last sentence). This is not only environmentally harmful but flies in the face of sustainability.