

Vale of White Horse Local Plan Deposit Draft 2031 (the “Plan”)

Part 2 Examination

Matter 8. Housing land supply delivery and monitoring

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1.0 Introduction

1.01 This evidence refers to the quantitative assessment of needs and demands for housing. In acknowledgement that housing is a systemic issue, while concentrating on land supply, the representations also refer to issues that could and should affect delivery. Having first addressed the SHMA, the paper refers to the particular issues of:

- housing suitable for the elderly,
- self/custom building and splitting, and
- community led housing.

1.02 All these types of housing are of real interest to the Government, Parliament and the public. However, none are given sufficient priority to make the Plan sound or accord with the relevant legislation and the NPPF.

2.0 The 2014 SHMA

2.01 ‘The Local Plan 2031 (Parts 1 and 2) seeks to fully meet the objectively assessed need for housing arising from the Vale of White Horse District...’.

The 2014 SHMA was and is a flawed and unreliable assessment of genuine housing needs. This can readily be seen through the way in which it

- conflates the ‘need’ for smaller houses to live in (ie the job of the Plan), with the ‘demand’ for larger houses as investments (ie not the job of the SHMA nor the Plan) and a distortion of the calculation of the OAN,
- seriously underestimates the need for houses suitable for the elderly,
- relies on ‘up-scaling’ to meet the demand for larger houses more than ‘down-sizing’, that would meet the need for larger houses by people moving to smaller dwellings and **reduce the land required** for the same number of dwellings.

- fails to understand that addressing the demand for down-sizing would reduce under-occupancy and **reduce the total number of new houses required** to meet genuine housing needs.
 - Fails to deal adequately or at all with the demand for co-housing or self/custom building.
- 2.02 The Government has now suggested that the 'OAN' in the 2014 SHMA is an over-estimate (possibly by as much as a third).
- 2.03 The SHMA mix for the VWH District favours a higher proportion of 3 bedroom properties than for Oxford City (for which over 2000 dwellings are being planned) ie 45 % vs 39 %. However, neither estimate of housing need reflect the fall in household size where the average household size is close to 2.5 while the current average dwelling size of about 3 bedrooms and suitable for 4 people. This would suggest a need for more two (and even one) bedroomed properties. When land, labour (even in the EU) and materials, all with implications for carbon emissions, are all scarce, and there are further implications for space heating/fuel poverty, this overestimate of housing need is material to the soundness of the Plan. A larger number of smaller dwellings that are genuinely/objectively needed would take up less land.
- 2.04 CP13a on the Oxford Green Belt is unsound as it seeks to justify changes to the boundaries to accommodate unmet housing need as an 'exceptional circumstance'. This overlooks the overestimate of the need for new housing by relying on the 2014 SHMA in respect of both the VWHD and Oxford City overspill, the need for smaller dwellings as well as the unexplored potential for custom-splitting. The latter should be investigated as a 'reasonable alternative' to developing in the Green Belt.

3.0 Housing the elderly

- 3.01 If the Plan continues to rely on the 2014 SHMA it will fail to address the need for down-sizing estimated by the All Party Parliamentary Group for Care and Housing of the Elderly at 8 million across the country (see the 2016 HAPPI 3

report¹) and crucially, would fail to provide sufficient and attractive downsizing options – including custom splitting that would enable ‘downsizing-in-place’.

- 3.02 Older households are those most likely to be responsible for the under-occupation of the existing housing stock and, for financial reasons and/or concerns about property maintenance, and the financing of social and health care, also express a demand to invest in and under-occupy new stock. The level of under-occupation could and should be seen as the least sustainable aspect of the housing system and should be a main concern to be addressed by a sound Plan to 2031.

4.0 Custom building and splitting

- 4.01 The Government expectation of housing supply (about 300,000 dwellings per year) far exceeds the capacity of the building industry to deliver. It is possible that the Government response to the *Independent Review of Build Out* being carried out by Oliver Letwin MP and the various initiatives in respect of off-site prefabrication might identify means to increase supply. However, it is current Government policy to see the rate of self/custom building increase from the current level of about 7% of <150,000 (ie 10,500) to 20% of <300,000 (ie 60,000), nearly a six-fold increase. Although this might be down to Development Management Policies under Matter 9, in so far as Government is relying on this sector to contribute to the delivery of the required numbers, the absence of adequate support in the Plan brings the prospect of delivering the planned numbers through traditional methods into question.

5.0 Community led housing

- 5.01 Although this is another matter to be dealt with under Matter 9 on Development Management Policies, the Government (see speech by Housing and Planning Minister Alok Sharma on 27 November 2017 that is found on

¹ <https://www.housinglin.org.uk/Topics/type/Housing-our-Ageing-Population-Positive-Ideas-HAPPI-3-Making-retirement-living-a-positive-choice/>

the Gov.uk web site) sees 'community led housing' as a means of developing 'difficult sites'. The absence of policies supporting these forms of housing brings the prospect of reaching the planned levels into question, or would rely on the relatively easy and sometimes more damaging or less sustainable sites being developed. Forms of community led housing are likely to be needed to maintain a supply of truly affordable housing, to provide examples of how housing can meet social needs, and to 'deliver' the choice in accordance with para 50 of the NPPF.

6.0 Summary of objections and soundness

- 6.01 Housing supply has to be considered in a systemic way to establish a reliable picture of the land requirement, viability, affordability and the prospects of delivery. In these circumstances it is necessary to consider together the issues of housing for the elderly (perhaps the most significant challenge for a development plan for the period to 2031), the potential of self/custom building and splitting and community led housing. Previous attempts to plan for housing without taking these important issues properly into account has resulted in the under-supply of housing in terms of quality, quantity and affordability.
- 6.02 The Plan relies on the flawed 2014 SHMA which has not provided an objective assessment of housing needs. The Plan underestimates the need for smaller dwellings, including those suitable for and attractive to the elderly, which is one reason why the SHMA is likely to have significantly over-estimated the need for new building.
- 6.03 The permissive policy relating to self-building will not be effective in providing the plots necessary to fulfil the duty under the Self-build and Custom Housebuilding Act 2015 (as amended). Prescriptive and proscriptive policies are required to enable this sector to grow to comply with the legislation and meet Government expectations.
- 6.04 Unless and until the potential of custom splitting has been explored, under-occupancy will continue at unsustainable levels and the Plan cannot rely on

the 'OAN' in the 2014 SHMA or claim that reasonable alternatives to building in the Green Belt have been exhausted.

- 6.05 The absence of support for co-housing, community-led housing or community land trusts, for example, through reserving parts of larger sites for these purposes, is disappointing, indicative of the lack of positive planning and not in accordance with the Government's aspirations for these sectors.
- 6.06 The Plan has not been positively prepared, will not meet development needs and infrastructure requirements of the District and is inconsistent with achieving sustainable development. The housing policies are unsustainable by failing to address the scale of under-occupation of the existing dwelling stock and going on to support an unnecessarily large number of new houses of the wrong size (some in the wrong places) and not adequately targeted at the real needs of increasingly elderly and smaller households.