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8<sup>th</sup> November 2014

## Response to Invitation to comment on the local plan

Sirs,

The new local plan, on which comment is invited, is based upon a Strategic Housing Market Assessment (SHMA) written by Messrs. G L Hearn Limited and dated April 2014. This report is itself informed by other specialist reports including a major report by Cambridge Econometrics (CE) dated 28<sup>th</sup> February 2014.

The report provides a great deal of analysis and concludes that there is a necessity to build 20,600 new dwellings in the Vale of the White Horse between 2011 and 2031. This is building at an average annual rate of 1028 a year.

The calculation behind this total is derived as follows: -

The Alternative Demography model referred to in the SHMA as "PROJ2. This is the calculation of future demand based on predicted future population growth. This plan is has been adjusted to allow for the abnormalities of the Oxford housing market and predicts 468 new dwellings a year	468
Catch up un past shortfall on 2006/7 to 2010/11 plan. The shortfall was 801 dwellings which is 40 a year for 20 years	40
A Committed Economic Growth Overlay referred to as PROJ4. This is to take account of major Economic developments, which will drive pockets of large job growth. In total this is expected to create demand for 11200additional dwellings or 520 a year	520
GRAND TOTAL AS ABOVE	1028

As there is considerable use of statistics about annual and aggregate growth in Populations, Jobs and Housing Numbers I set out below tables 39 and 40 from pages 100 and 101 of the SHMA, which summarises the statistics neatly.

	Annl Pop Growth	Annl Housing Growth	Annl Emp Growth	Total Pop Growth	Total Housing Growth	Total Emp Growth
PROJ2	873	468	301	17453	9365	6012
PROJ 4	2526	1028	1195	50556	20559	23901
Incremental 2 to 4	1653	560	894	33103	11194	17889

I will now set out my difficulties with the SHMA, which I believe are so severe that the local plan should be withdrawn and rewritten.

### **The Alternative Demography model (PRO12)**

Population growth in the Vales is set out in the SHMA Table 14 Page 15. It has run at 5% pa between 2001 and 2011. The assumption used in the Conclusion is that Population will grow at 7% pa between 2011 and 2031. This seems to fly in the face of the table and charts on page 61 which state that the population is aging and that the proportion who might be considered child bearing appears to be about static.

In the absence of any other reason for this I can only conclude that our councilors plan to introduce Viagra to our drinking water or that they have the numbers wrong. I suggest a 5% population growth is more realistic and the 468 houses proposed should be pro rata reduced by 134 to 334 houses a year

### **Past performance against past plans**

The SHMA is calculating the numbers of dwellings required to be built by subtracting the existing stock from that required in the future. Given that the existing stock is smaller than it otherwise would have been had the past plan been delivered in full then this shortfall does not need to be included again otherwise it is being double counted.

The SHMAA proposed total is therefore overstated by a further 40 houses a year.

### **Supporting Committed Economic Growth (PRO14)**

The housing total considered necessary to support Committed Economic Growth is the largest component part of the SHMA assessment. It also appears to be the most flawed.

This exercise is supposed to reflect the effect of specific abnormal jobs growth scenarios. They are set out in the report and include things like Very fast economic growth at Harwell and Milton Park for example.

The CE report listed 12 particular cases across Oxfordshire totaling some 27,750 expected new jobs over the 2011 – 2013 time horizon. Importantly only 10,200 of these jobs were considered to be in the Vale by CE.

By the time that the final SHMA report was published the job total had been revised down to 25,050 jobs however 17,889 were considered to be in the Vale. To put it at its most charitable it seems there is an inconsistency here and it appears that growth assumptions of 7600 jobs, driving a population growth of about 14,000 and a housing requirement of some 4755 dwellings are overstated.

In addition to this the reports all seem to assume that property should be built were the jobs are created. I do not think that is necessarily true either. If we take

the two biggest individual Scenarios, Growth at Harwell and Milton Park, Is it not at least likely that a significant proportion of the hi tech, highly educated employees needed in these jobs will live anything up to 10 miles from work and thus very likely in a neighboring authority area. It is also highly likely that a lot of flats will be require probably in riverside locations rather than endless boxes on vast housing estates.

Taking the forgoing into account I believe the PROJ4 calculations to be overstated by somewhere between 4700 and 6000 houses or between 235 and 300 a year.

### **Conclusion**

In conclusion I believe the SHMA overstates the Vale housing need by between 800 and 9500 units as set out below.

	Per SHMA Aggregate	Per SHMA Annually	Should be Aggregate	Should be Annually	Overstated Demand Aggregate	Overstated demand annually
PROJ2	9365	468	6680	334	2685	134
Catch up	801	40	0	0	801	40
PROJ4	11194	560	5194 - 6439	260 - 315	4755- 6000	235 - 300
TOTALS	21360	1068	11874- 13119	594-649	8241- 9486	409-474

In the circumstances there seems to me to be precious little point in discussing or even producing a local plan that is based on such flawed data and I suggest you have a rethink.

Yours sincerely

Robin Border