

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

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### **Hearing Statement**

#### **Matter 2 - Objectively assessed housing needs**

##### **2.1(a) & (d)**

18. The SHMA does not properly or adequately take account of the level of under-occupation of the existing housing stock (at least if not more important than the numbers of new dwellings) and the declining household size. Importantly, the SHMA does not explain or quantify the potential for meeting the ‘objectively assessed need’ for housing through building smaller dwellings.

19 The housing need has been assessed over a period of about 16 years covering specific or potential rural locations where there would be a high propensity for people to want to move within their village.<sup>1</sup> The logical consequence of supporting village housing would be the inclusion of policies to ensure that developments in rural areas were phased throughout the plan period.

20. At para 1.23 the Plan repeats the terms “objectively assessed need “ without any apparent questioning of the evidence on which the Plan is based. In fact, the SHMA expressly based a figure of “need” on the Local Enterprise Partnership “guess” as to what might happen to the Oxfordshire economy. It also confused ‘demands’, ‘requirements’ and ‘needs’ and made some insupportable assumptions about downsizing and upsizing as well as owning up to an inadequate understanding of self/custom building, which has become a Government priority. Importantly, neither the LEP nor the SHMA have taken into account the real difficulties in providing the infrastructure (or the unlikely radical transport measures) that would allow growth to take place without increasing congestion to levels which would make the area less sustainable for both new and existing residents

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<sup>1</sup> When asked, 9 out of 10 people living in the countryside said that they would prefer to stay where they are, compared to urban areas where only 2 in 10 people stated that they wanted to stay – and half reported a desire to move to the countryside.(The Taylor Review p34  
[http://www.wensumalliance.org.uk/publications/Taylor\\_Review\\_Livingworkingcountryside.pdf](http://www.wensumalliance.org.uk/publications/Taylor_Review_Livingworkingcountryside.pdf)

and businesses. The SHMA is not 'objective' and is only one of the sources of information on which housing need within the District should be assessed.

21. The following comments were submitted to the LPA on publication of the SHMA:-

"To meet local needs the Plan would also need to require the larger sites in villages to meet the need identified in 'local housing needs surveys' that would have previously been located on 'exception sites'. This will require a special level of discounting of the land value to make these dwellings affordable to the local people identified through these surveys. By not conflating or combining these 'exception sites' with rural allocations the Plan is ignoring the evidence contained in these surveys that will inevitably lead to support for developments on even less suitable sites around villages.

...3. Conclusions

3.01 Para 9.1 raises the three questions to be answered by the SHMA all relating to housing 'needs'. Clearly this cannot be based on the analysis that conflates and confuses needs with demands, wants and requirements. And the overall figure is based on projections of job growth that have not been properly scrutinized.

3.02 At para 9.55 the SHMA suggests that increased supply will reduce price although there is very little if any evidence to that effect. The housing market is so much more complex than a simple model of supply and demand. The SHMA is right to say that the affordability of housing should be taken into account when assessing the contribution towards achieving sustainable development. However, in doing so, equally important issues have to be considered as to the environmental costs of building new houses on the scale being proposed together with the infrastructure required to enable the local economy to continue to perform despite already serious congestion problems. There is a failure to appreciate that sustainable development is achieved through meeting economic, social and environmental objectives and not trading one off against another. The emphasis on economic growth suggests a misunderstanding of that fundamental point.

3.03 There is no evidence of the capacity or the desire of the house-building industry to build at the rates implied or proposed in the SHMA. In fact were the price of housing to be reduced by supply in the way being suggested, the incentive to increase building rates will be reduced. It would be expected that the SHMA would identify the owner-occupying pensioners as the greatest source of finance to drive housing growth (nationally 4m households are looking to downsize in the next 5 years, half of those looking to move house are downsizers and the potential capital to be released into the economy runs to £trillions). A greater number of smaller houses can be built on less land. The SHMA is discredited by the many repeated references supporting the building of larger houses to enabling upsizing, the demand for which (even if it exceeds existing plentiful supply) could more easily be achieved through the release of larger dwellings by downsizers.

3.04 By failing to properly consider how planning authorities could increase self-building the SHMA fails to recognize that self-building integrates the supply with the demand for housing. This would be less dependent on the vagaries of the housing market and the traditional models being followed by volume housebuilders. Reliance on a local champion for self-building (para 9.90) should be seen as an abrogation of the responsibility for the SHMA to make positive recommendations of how identified housing needs could be met. A planning authority responsible for preparing development plans (with the SHMA included in the evidence base) cannot reasonably wait for 'champions' to emerge when the same objective can be achieved through planning policy.

3.05 The distinct lack of enthusiasm for self-building is only exceeded by the muddled thinking in respect of co-housing. 'Intentional communities' are increasingly being recognized elsewhere (including abroad) as an attractive way of meeting the complex demands of downsizers, but also providing an alternative to new and younger households that are currently being forced to share unsuitable properties (including with parents). This pattern is described at para 9.89 but it is entirely unclear about what would be achieved by the SHMA recommendation to look at room sizes, property types and HMOs? Co-housing is entirely consistent with the group/self-building being incentivized by Government. It is also consistent with the need to reduce the costs of caring for pre-school children, the sick,

disabled and the elderly. The SHMA identifies most of these needs but makes no positive suggestions how they could be met.

3.06 The SHMA cannot be seen as an objective assessment of housing needs in general or in the specific sectors identified. Given that it is unlikely to be revisited in the timescale during which the local plans will be produced, LPAs should dedicate themselves to a detailed analysis of the SHMA to decide what recommendations should be followed, which should be rejected and where housing needs have simply not been included. The SHMA is not designed to assess the implications for the environment or for infrastructure provision. When these essential matters are taken into account the 'need' for small dwellings including substantial proportion dedicated to co-housing and self/group- building becomes clear. The fact that these needs have not emerged from the evidence and analysis included in the SHMA is evidence of its deficiencies and reasons for limiting the weight that should be given to its conclusions.

3.07 If the substantial scale of new housing envisaged by the SHMA is proposed in development plans and site allocations, this would have the benefit of providing space for different forms of delivery. There would be no cost to a developer if part of a large site is allocated to self-building and/or co-housing during the years it might take to build out the remainder in more traditional ways. It is not clear what purpose the partial analysis provided by the SHMA might have in supporting the work of plan preparation, but it is a good example of a document dedicated to housing supply but which has failed to grasp the special characteristics of self-build and co-housing, deficiencies that could and should be made good by the LPAs in their local plans."

22. These remain valid reasons why the SHMA is only part of the story of housing need within the District - and how the various needs should be addressed by the Plan.

23. Perhaps because of the deficiencies in the SHMA, para 6.4 of the Plan refers to the growing number of smaller households but not to the unsustainable level of under occupation (ONS 2011 – QS-408EW) that is a result of the failure to provide attractive downsizing alternatives. It is unclear what is intended by Core Policy 22, but, to soundly address objectively assessed need (see ONS figures), it should be making it clear that

small dwellings should be the predominant form of housing required to meet the needs in the District. Although a number of builders are ahead of the planners in realising the potential of addressing the downsizer market – (estimated at 50% of those looking to move), the development plan is actually required to plan positively to meet identified needs. In this case the undeniable need is to plan positively to reduce the unsustainable level of under-occupation. Developments have recently been allowed in Abingdon (160 dwellings and Drayton (73 dwellings) with no/zero one or two bedroomed properties for sale. In rural areas smaller dwellings are particularly scarce and are needed as being relatively affordable for new households to buy.

24. 'Core Policy 24: Affordable Housing:' This policy and preceding paragraphs are not up to date with the Government's proposal that self-building could (or should) be a form of affordable housing<sup>2</sup>. The Plan is the opportunity to formalise the fact that self/custom-building/finishing is an affordable way of providing housing (definitions of these categories will be required in a sound local plan – see questionnaires produced by other LPAs eg Erewash DC) and, as the Government has removed the liability of CIL/s106, should be part of the 35% which is already exempt from CIL and s106 contributions. Self-building could be incorporated into schemes permitted under the new Starter Homes policy, possibly increasing the 20% discount. The Plan should also be referring to 'affordable living' as well as 'affordable housing' as running costs will be what actually matter to the occupiers, and fuel poverty and other running costs are known to be of serious concerns to residents. In these circumstances energy efficiency is not just an environmental priority but is fundamental to the affordability and sustainability of housing. The Plan should prioritise smaller, terraced housing as being more affordable (in private and social rental sectors) in construction, purchase/rent and occupation. A local plan that fails to address these important issues should not be found to be sound

25. Since the plan was produced the Self-build and Custom Housebuilding Act 2015 has been passed and modifications should be made to assist with the substantial increase in the self/custom-building sector intended by Government. Teignmouth DC is an example of a LPA that is securing a proportion of self/custom-build serviced plots on larger residential developments.

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<sup>2</sup> DCLG Consultation on *Right to Build*

26. 'Core Policy 26: Accommodating Current and Future Needs of the Ageing Population:' This is a very important part of the Plan but seems to be in danger of being out of date before its adoption. The concept of Lifetime Homes that encourage under-occupation and isolation is being reconsidered and replaced by Lifetime Neighbourhoods within which people can move as household circumstances change, including aging and caring. This does not mean that there should not be a supply of homes built to a high mobility standard, but these will mostly be smaller dwellings and any larger ones should be covered by a policy requiring adaptability/sub-division to be incorporated in the original design.

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### **Soundness - Summary**

The failure to adequately plan for sustainable development should result in the Plan being found **unsound** for the following reasons:

- The plan has not been **positively prepared** as sustainable development is more likely to occur in spite of the Plan rather than due to its policies.
- The Plan does not include a strategy which seeks to meet **objectively assessed requirements** of the Climate Change Act and the related carbon reduction budgets.
- The plan is not **justified** because it is not based on the logical implications of the Climate Change Act for the development of land and buildings over the next 15 years.
- The Plan is not based on **robust and credible evidence** that relates to the necessary reduction in carbon emissions from existing land and buildings as well as all new development.
- The document will not be **effective** due to the failure to understand the repercussions of the statutory and advisory carbon reduction targets.
- The development supported by the Plan will not be **deliverable** in accordance with the criteria in the Plan. Development would need to accord with other criteria in order to contribute to the achievement of sustainable development.

- The Plan is not **flexible** in the sense that it would need substantial change to be contributing to the achievement of sustainable development.<sup>3</sup>
- It would not be possible to **monitor** the contribution it is making to the achievement of sustainable development as it lacks the necessary criteria (eg energy assessments, carbon reduction targets and rates) to carry out that fundamental exercise.
- The Plan is not consistent with **national policy** in respect of carbon reductions nor the **Climate Change Act** (see NPPF paras 14 and 94).

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<sup>3</sup> S.39(2) Planning and Compulsory Purchase Act 2004