

# **VALE OF WHITE HORSE LOCAL PLAN 2031**

## **(Part 1 Strategic Sites and Policies)**

### **EXAMINATION**

#### **Stage 1 Matters and Questions (to be considered by the Examiner)**

Faringdon Town Council does not believe that the conditions set out in the following Matters are met.

#### **Matter 2 – Objectively assessed Needs for Housing and Employment Land**

##### **Matter 2.1**

- a) The SHMA for Oxfordshire to 2031 undertaken by G L Hearn appears to be based on a series of unjustified assumptions. For example, paragraph 3.11 of the Hearn Report states: *‘The projections only run to 2021 and project further falls in the proportion of young people who will form new households. Whilst these trends are influenced by declining affordability of housing and the economic recession, it is not reasonable to plan on the basis that we see a further deterioration in household formation.’*

This contains both a ‘reasonableness’ assumption and a dismissive reference to the DCLG figure for housing growth from 2011 to 2021 of 7.0% despite this being consistent with historical trends. Extrapolating this growth prediction to cover the whole period 2011-2031 gives an increase of 14% (i.e. consistent with the historic national average and higher than the 4.6% historic figure for the Vale); applying this growth rate solely to the Vale, it produces a total of 57,531 houses by 2031, an increase of 7,750 houses over the 2011 figure, with an average build rate of 388 p.a.

G L Hearn’s figures, however, project that there will be closer to a 10% rise over each of the two decades giving an extra 10,160 houses in the Vale, an increase of 2,410 over the predicted DCLG figures, equating to a further 120 house to be built annually. The calculation is then further adjusted upwards to provide sufficient households to meet both the estimated number of new employment opportunities and the desired number of affordable houses, finally arriving at a grand total of 20,560 new houses required in the Vale up to 2031 giving a build rate of 1,028 p.a.

These differences are irreconcilable and the Hearn figures, which appear to have been accepted as fact, are not evidence-based, but mere speculation.

- b) It is not appropriate to include the previous shortfall which forms part of Hearn’s calculations.
- c) Nowhere in the report is there any evidence to support the increase in jobs predicted. There are estimates based on the allocation of employment land with the assumption that it gets developed and manned at the levels predicted. Using the predicted jobs’ numbers leads to a positive feedback loop where the number

of houses based on the number of jobs predicts the number of jobs based on the number of houses, etc. to produce a self-justifying number.

The Vale has about 50,000 houses; the assessed increase over the period to 2031 is ~20,000, i.e. a 40% increase. This number will not be created at a steady rate, year on year; it is likely to be front loaded and thus raises serious questions about infrastructure provision of water, services, schools, health provision, etc. to support this increase.