

**VALE OF WHITE HORSE LOCAL PLAN 2031 EXAMINATION Part 1.**

**MATTER 2:**

**OBJECTIVELY ASSESSED NEEDS FOR HOUSING AND EMPLOYMENT**

**SUBMISSION BY EAST HENDRED PARISH COUNCIL**

Including submissions made by

Roger Turnbull, Cllr of East Hendred Parish Council

August 2015.

- 1. Is the need for 20,560 dwellings, in Policy CP4, soundly based, and supported by robust evidence?**
  - **are the adjustments to the 2011 CLG demographic forecasts soundly based?**
  - **Is the allowance for shortfalls appropriate?**
  - **Are the adjustments to the economic forecasts soundly based?**
  - **Are they realistic, and will they increase demand for new housing?**
  - **Is the identified need for 219 hectares of employment land soundly based?**

### **THE 2011 CLG PROJECTIONS ARE OUT OF DATE**

- 1.1 Under PPG ref: ID 2a-016-20150227, Methodology in preparing Housing and Economic Needs Assessments, local needs should be informed by the latest available information. This is identified as the Feb 2015 2012 based CLG Population Projections. So the Objectively Assessed Needs for housing are not soundly based because they use the out of date 2010 and 2011 based projections as the Base Case.
- 1.2 The Base Case is then adjusted to form the Alternative Base Case. It is unsound, because it is also derived from the out of date 2010 and 2011 based projections, as is the Planned Economic Growth option.
- 1.3 The Feb 2014 Cambridge Economics on Economic Forecasts to inform the Oxfordshire SHMA, page 10, states that the Baseline Case used the 2011 based Interim CLG projections up to 2021, and the 2010 CLG from 2022 onwards. The 2010 based CLG were found to under-report in Oxfordshire due to under-reporting of the student population, so JG Consultants were asked to prepare an alternative set of projections, and then adjusted to take account of unspecified new ONS data. In Oxford, the alternative population projections were too low, and an alternative approach taken, adjusting migration and fertility rates, and increasing employment in education. These are a significant amount of adjustments required to amend out of date 2010 and 2011 CLG projections, including the use of more recent ONS data.
- 1.4 Firstly these adjustments demonstrate that the 2010 and Interim 2011 based CLG projections are unsound, as acknowledged in the report. Secondly there is no transparency in how the adjustments were made.
- 1.5 The 2010 based CLG projections pre-dated the 2011 Census, and hence is not based on the latest available information. The Interim 2011 based CLG projections only cover the period 2011-21, and have a number of acknowledged weaknesses due to being prepared very soon after the 2011 Census, before trends could be updated.

## **THE 2012 BASED CLG PROJECTIONS, dated FEB 2015.**

1.6 The 2012 based CLG population projections published in May 2014, 3 months after the Feb 2014 Cambridge Econometrics Report cover the period 2012-2037. The 2012 based CLG Household Projections were published in Feb 2015, **see Appendix 1.**

1.7 The 2012 based CLG projections show the following in The Vale:

### **PAST TRENDS 2001-2011**

2001 Households	46,000
2011 Households	50,000
2001-2011 Change	+4,000 ( 2001-2011 an average of +400 per year)

### **CLG PROJECTIONS 2011-2031**

2011 Population	120,000
2021 Population	126,000
2031 Population	132,000
2011-2031 Change	+12,000 (2011-2031 an average of +600 per year)

2012 Households	50,000
2021 Households	54,000
2031 Households	58,000
2012-2031 Change	+8,000 (2012-2031 an average of 400 per year)

Source: Population Table 426 and Households Table 406 CLG Projections

2012 Av. Household Size	2.38
2031 Av. Household Size	2.29

1.8 The 2012 based CLG Household Projections 2012-2031 more closely match the past trends of 2001-2011 than the CE Alternative Population Baseline, both showing an average growth of 400 households per year, (equivalent to an average population growth of 600 persons per year).

1.9 The justification on page 11 of the Feb 2014 Economic Projections Report for using an Alternative Population Baseline was that it “more closely matched the rates seen over 2001-2011.” That statement does not seem to be justified where using the 2012 based CLG Projections. Hence, little weight can be given to the CE justification for using an Alternative Population Baseline, based on out of date projections, which took limited account of the 2011 Census results.

1.10 Under PPG Housing and Employment Assessment Methodology, a comparison with past trends is required for housing and economic projections.

1.11 A comparison with past trends demonstrates that the projections are REALISTIC (my emphasis), as required by the NPPF. The PAS Technical Advice Note states that aspirations are not sufficient, but that credible supporting evidence is necessary to show how changes will be brought about.

1.12 It is concluded that:

**THE 2012 BASED CLG PROJECTIONS OF c. 8,000 NEW HOUSEHOLDS SHOULD BE THE STARTING POINT FOR ANY ADJUSTMENTS, NOT THE 2010 & 2011 BASED ALTERNATIVE POPULATION BASELINE.**

## **ADJUSTMENTS TO THE HOUSEHOLD PROJECTIONS**

1.13 The PPG states that the projections “may require adjustment to reflect factors affecting local demography and household formation rates which are not captured by past trends.” But NPPF paras 154-161 says that Local Plans should be aspirational but realistic, with meaningful engagement of a wide section of the community, based on a clear understanding of housing, incl. affordable housing, and business need. The Milton Keynes Core Strategy Inspector accepted that it was unrealistic for the Plan to meet more than the housing needs in the unadjusted household projections, reducing the housing requirement from 48,000 dwellings in the RSS to 28,000 dwellings. He also considered that no adverse effect would be caused by an imbalance in housing and job growth, on the grounds that in-commuting into a sub-regional centre was to be expected due to the wide range of jobs and services.

1.14 The need for adjustments has been reduced by the publication of the 2012 based CLG projections, because they take greater account of the 2011 Census. They estimate an increase of 14,000 population in Oxford City 2011-2031, compared to a 0% increase in the 2010 & 2011 based CLG projections used in the Feb 2014 CE Report, so they address under-reporting in Oxford City in the 2010 & 2011 based CLG forecasts.

1.15 They estimate an increase of 12,000 population in The Vale 2012-2031, an average of 600 persons per year, which closely matches the past trends for 2001-2011. Source CLG Population data. This is broadly the same population growth as the Baseline Projection in the CE Report.

1.16 The adjustments can relate to:

- household formation
- migration
- unattributable population change
- other factors

## **HOUSEHOLD FORMATION**

- 1.17 At Gloucester/Cheltenham/Tewkesbury Core Strategy Examination, NNMS Consultants (Neil MacDonald & Christine Whitehead) in their November 2014 Report adjusted household formation rates to partially return to the 2008 based headship rates for the 25-34 year age group because the 2011 based headship rates were below the trend in the 2008 based data. At the Examination, they considered there was no need to adjust the headship rates because they took greater account of the 2011 Census. At South Worcestershire, the Inspector quoted Prof Holman's Paper to the Town & Country Planning Association. The recent April 2015 Town & Country Planning paper Making Sense of the New English Household Projections by Ludi Simpson and Neil McDonald broadly supports the use of the 2012 based headship rates, with qualifications.

## **MIGRATION**

- 1.18 The same Consultants argued for using a 10 year migration trend rather than a 5 year trend (2007-2012) in the 2012 based CLG projections, due to the effects of the recession.

## **UNATTRIBUTED POPULATION CHANGE**

- 1.19 Opinion is divided on adjustments from this source, with the South Worcestershire Inspector considering that it had no effect on the jobs-led modelling. Unattributed Population Change is not included in the 2012 based CLG Household Projections and a decision to include them would be arbitrary rather than based on credible evidence.

## **EMPLOYMENT TRENDS**

- 1.20 The PPG states that "Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate." The Official Labour Market Statistics prepared by the Office of National Statistics (ONS) show no change in employment in The Vale 2001-2011.

2001 65,000 jobs  
2006 64,000 jobs  
2011 64,000 jobs  
2013 66,000 jobs

Source: Nomis.

- 1.21 The employment projections thus need to be assessed against these past trends, as required by PPG Methodology on Housing & Employment Assessments, to test whether they meet the test in the NPPF, that they are both aspirational and realistic.

1.22 It is also concluded that the CE economic forecasts should be based on the unadjusted 2012 based CLG Population forecast, because the Alternative Population Baseline is based on out of date projections, and to allow transparency in seeing the effect of adjustments to the CLG projections. The 2012 based CLG Projections, published in May 2014, have been shown to be more closely matched with past trends than the Alternative Population Baseline, which was the justification for adopting them on page 11 of the Feb 2014 CE Report.

1.23 At the Stroud and the Gloucester/Cheltenham/Tewksbury Core Strategy Examinations, the Inspectors asked the Councils to use as a starting point the latest unadjusted CLG Projections, as the base for household, dwelling, and economic projections. At South Worcestershire, the Inspector, commenting on the variations between economic projections, based his recommendations on a triangulated average of three economic projections, from CE, Experian and Oxford Econometrics.

### **REQUEST FOR ALTERNATIVE ECONOMIC PROJECTIONS**

1.24 The Inspector is asked to request the Council to prepare at least one other economic projection from another Consultant, due to the variations in the methodology and assumptions within the forecasting models of different Consultants.

1.25 At Gloucester/Cheltenham/Tewkesbury, the Council's Consultants concluded that, using CE economic activity rates for the South West region, no additional homes were needed above the demographic Observed Assessed Need (OAN) for the three areas. The Core Strategy proposes 30,000 new dwellings and 28,000 jobs 2011-31, with 10,000 dwellings in each District. The three Districts have similar characteristics with Oxfordshire, comprising a City, which already extends to the Green Belt boundary, and a rural District constrained by AONB and flood plain.

1.26 In Table 23 of the Mar 2014 SHMA, the forecast growth in residents in employment in the Baseline Scenario, 11,053 employees, exceeds the forecast growth in jobs, 10,628 jobs. There would therefore be no need for additional dwellings to meet the unadjusted Baseline Scenario, assuming a commuting ratio of 1.04.

1.27 The Feb 2014 CE Report Baseline Employment Projection for The Vale, Table E.1 shows a forecast growth from 67,000 to 76,000 jobs 2011-31, an increase of 9,200 jobs. Any adjustments should be made in relation to the 2012 Based CLG Projections, which are similar to the CE Baseline in Table 3.2. Table E.3 shows a 27% increase of 4,900 jobs in Finance & Business Services, the largest growth sector, with no change in Government Services or Manufacturing.

- 1.28 By comparison, the Planned Economic Forecast shows, Table E.5, shows a 54% increase of 9,200 jobs in Finance & Business Services, a 73% growth of 3,200 jobs in Manufacturing, and no change in Government Services. These assumed growth rates are significantly higher than the unadjusted CE employment forecasts in the Baseline Forecast in Table E.3. with limited evidence to justify how these changes would be brought about.
- 1.29 The SHMA recommendations for The Vale are the only District where the Planned Economic Growth Scenario significantly exceeds the need for affordable housing, assessed as 683 dwellings per year. The Inspector is asked to request that the SHMA is reviewed to estimate the need for affordable housing based on that arising from the forecast growth of new households in the 2012 based CLG Projections, and any revised adjustments in this and other submissions.
- 1.30 The SHMA recommendations for The Vale offer no alternative economic based scenarios or range of housing requirements, unlike every other Oxfordshire District, justified in its conclusions, para 4.3 on the basis that “this is directly aligned committed economic growth scenario.” It is my understanding that only after the adoption of the Local Plan, would there be a planning commitment to the level of growth.

#### **EVIDENCE TO JUSTIFY HOW CHANGES TO FORECASTS WOULD BE BROUGHT ABOUT.**

- 1.31 Harwell Campus is an existing allocation in the 2011 Local Plan under Policy E7, where significant demolition of existing buildings has taken place. The Inspector is asked to request information on how much floorspace has been demolished so the net gain by redevelopment of science laboratories can be justified. Research activities at Harwell employ 4,500 people at Harwell. The same number as in the 2011 Local Plan. The expected growth at Harwell in the Local Plan of 2,500 jobs did not occur by 2011 as planned. The EZ was expected to attract 8,000 jobs by 2015, (page 52 of the March 2013 Employment Land Review).The developer Partnership to achieve this was terminated when these forecasts were not met.
- 1.32 Parts of the EZ are open space used for recreation. The NPPF requires an assessment to be made prior to the loss of open space which may require providing alternative facilities elsewhere. I am not aware that such an Assessment has been carried out. Other parts outside the EZ have been allowed to revert to landscape and do not comply with the NPPF definition of brownfield land, whilst the RAL site is largely already developed or a large bund to screen the new development. The timetable for the removal of contaminated waste by Magnox has been put back from 2025 to 2040.

## **HARWELL MASTER PLAN**

- 1.33 The Harwell Master Plan in Harwell Now, Harwell Future Summer 2015, appears to show new development largely by redevelopment of existing buildings south of Fermi Avenue. It comprises 2 x 50,000 sq.ft buildings to be subject to planning applications in The Quad, a Space Cluster of 250,000 sq ft ‘to rationalize what is there,” and a 200,000 sq.ft University Quarter “to support teams that are already there.” Neither does the RAL Annual Report provide credible evidence of Government funding to support the proposed 5,400 additional jobs at Harwell in Table 4.1 of the CE Report. The “University quarter” could provide jobs in the education sector already included in the CE Employment forecasts.

### **IMPACT ON THE AONB.**

- 1.34 East Hendred Parish Council have objected to the scale of development within the AONB at Harwell Campus. The NPPF states that the protection of the AONB requires special circumstances to be justified to support large-scale development within the AONB. This would particularly apply to the loss of open space, landscaping, or greenfield land at Harwell Campus. Local Plan Policy E7 states that no development will be permitted within structural areas of open space, and perimeter landscaping and Policy NE1 protects areas of nature conservation value. Thus robust credible evidence is required to justify the Local Plan proposals for Harwell Campus. The proposals for 10,200 additional jobs above 2012 based CLG projections, focused on land in the AONB are not considered to meet that test, because they either involve double-counting, are already provided for in the CLG projections, involve redevelopment “to rationalize what is already there,” or are not permitted under 2011 Local Plan Policy E7 and NE1.

### **SUGGESTED AMENDMENT TO ADJUSTMENT FOR ADDITIONAL JOBS AT HARWELL CAMPUS.**

- 1.35 Whilst support to the scientific work being done at Harwell is welcomed, a reduction in the net increase in jobs from 5,400 (a 120% increase) to nearer 2,500-3,500 new jobs (a 55%-78% increase) would be more likely to be achievable. It is also unlikely that there will be 2,500 additional jobs in Space Science and Satellite Technologies, because these would involve double-counting with Harwell Master Plan for its Space Quarter and University Quarter proposals already provided for at Harwell Campus. I also consider 200 proposed additional retail jobs, 1,500 warehouse and distribution jobs, and 100 environmental technology jobs are already accommodated within the unadjusted CE Employment Forecasts, and should not be added as an adjustment.



- 1.36 The competition from major surrounding areas has been inadequately discussed. The Vale is a rural area with no large settlements able to compete in size for the growth in Finance & Business Services with London, Oxford, Reading, Swindon, Newbury. These are all accessible from parts of the District. This makes the forecast 53% growth in the Planned Economic Growth Scenario in Finance & Business Services unrealistic and the Plan aspirations unlikely to be brought about. The 27% growth in Finance & Business Services in the Baseline Scenario seems more realistic, whilst remaining aspirational.

### **IMPLICATIONS OF SHMA HOUSING REQUIREMENTS ON OXFORD**

The SHMA housing requirements for Oxford of 20,000 to 30,000 additional dwellings are significantly above land availability identified as c. 10,000 dwellings. In July 2015 the Leader of The Vale considered that the level of growth proposed in The Vale would prevent The Vale being able to accommodate Oxford City's unmet need. Hence, a reduction in the housing requirement in The Vale would enable some of Oxford's unmet needs to be met in The Vale, if such a need could be justified.

The Alan Baxter Oxford Transportation Strategy Response April 2015 page 15 shows that the SHMA would increase trips from Oxfordshire into Oxford from 35,000 trips per day by the addition of 26,000 trips per day. This is in addition to 42,000 trips per day within Oxford. Oxford has successfully prevented a growth in car commuting into Oxford 2001-2015, and achieved a reduction in car use in the City Centre, which has protected its historic character, by traffic management. On page 59, the DfT project a 37% increase in car commuting into Oxford. It will be exceptionally challenging to continue to protect Oxford's historic environment from the impact of these housing projections.

- 1.37 IT IS CONCLUDED THAT THE GROWTH IN EMPLOYED RESIDENTS IN THE UNADJUSTED BASELINE SCENARIO EXCEEDS THE GROWTH IN JOBS. THERE IS THEREFORE NO NEED FOR ADDITIONAL DWELLINGS ARISING FROM THE DEMOGRAPHIC PROJECTIONS.**

- 1.38 IT IS CONCLUDED THAT THE PROPOSED ADJUSTMENTS TO THE 2012 BASED CLG PROJECTIONS SHOULD BE REDUCED FROM 10,200 JOBS IN TABLE 4.2 OF THE FEB 2014 CE REPORT, TO 2,500-3,500 JOBS AT HARWELL CAMPUS, FOR THE REASONS SET OUT ABOVE.**

- 1.39 THE TOTAL EMPLOYMENT -BASED SCENARIO SHOULD THEREFORE BE AMENDED BY CHANGING THE GROWTH IN JOBS FROM 23,000 ADDITIONAL JOBS IN THE DRAFT LOCAL PLAN TO 11,700-12,700 ADDITIONAL JOBS (c.9,200 jobs plus adjustments of 2,500-3,500 jobs), TO MEET NPPF ADVICE THAT THEY SHOULD BE ASPIRATIONAL AND REALISTIC. (I.e. similar to the level of housing and jobs in the Alternative Population Projection, the RSS, and Options A, C & E of the Sustainability Appraisal).**

## **2 IS THE 219 HECTARES OF EMPLOYMENT LAND SOUNDLY BASED?**

2.1 The proposed 219 hectares of employment land can be compared with the 219 hectares of available employment land in Milton Keynes, as shown in the Milton Keynes Core Strategy, and the 64 hectares of employment land proposed in the Gloucester/Cheltenham/Tewkesbury Joint Core Strategy. It is significantly larger than the proposed employment land in the adjoining District of South Oxfordshire.

2.2 The most recent Annual Monitoring Report dated 2011, fig 12, states that 89 hectares of employment remained undeveloped in 2011, of which 31 hectares had planning permission. At Harwell Campus, 36 hectares of allocated employment land remained undeveloped in 2011.

2.3 In paragraph 53, Local Plan 2011 Policy E9 notes that employment be directed to the five main settlements. The 2011 Local Plan, page 209, proposed 7,500 new jobs divided between Milton Park (2,500 jobs), Harwell Campus (2,500 jobs) and West of Didcot Power Station (2,500 jobs on 64 hectares). Whilst development at Milton Park has been implemented, proposals for 2,500 additional jobs at Harwell Campus and at West of Didcot Power Station have not been implemented.

### **2.4 TOTAL B1, B2, and B8 DEVELOPMENT 2006-2011**

(Fig 10 of AMR 2011)

Permitted Employment Development 44,477 sq.m. floorspace.

This implies a take up of employment floorspace of 8,896 sq.m. per year between 2006-2011.

2.5 The Addendum to the Employment Land Review estimates the need to provide for 6,000 B Class jobs in the CE Baseline and Alternative Population Scenario. Table 3.1 shows that there is capacity for over 7,000 jobs based on 62 hectares of employment land, on which 3,900 jobs would be provided at Didcot A. Under the Planned Economic Growth Scenario, sites are expected to accommodate 12,400 additional jobs to the Baseline Scenarios, of which 8,000 additional jobs are at Harwell Campus, 1,500 jobs are in existing premises at Didcot A and 500 jobs at Grove (Williams F1).

- 2.6 Clarity is sought on what provision has been made in the Plan to meet the land requirements of 4,600 additional non-B Class jobs in the Baseline Scenarios and an additional 2,400 jobs in the Planned Economic Growth Scenarios. These may be retail, educational e.g. University, health or sui generis jobs, on Town Centre Sites, on employment or residential land.
- 2.7 The Aug 2013 Employment Land Review estimated in Table 2 a Demand for 140-146 hectares of employment land based on 14,300 jobs in office, warehousing and industrial land, with 92 hectares in the EZ and 48-54 hectares elsewhere. Table 3 provides for 63 hectares for business use (Offices), 58 hectares for Industry, and 23 hectares for warehousing.
- 2.8 The Aug 2013 Employment Land Review summary and conclusions do not therefore provide a clear paper trail of credible evidence to support the proposed 219 hectares of employment land in the Local Plan. In particular, the proposed additional 58 hectares for Industry is not supported by the forecast no change in employment in Manufacturing in the Baseline Scenario or the increase of 3,200 jobs in the Planned Economic Growth Scenario.
- 2.9 The Aug 2013 Employment Land Review is based on out of date data. For example, Table 4-2 shows population forecasts to be rebased when the 2011 Census data is available. Table 4-7 Travel to Work Patterns is based on 2001 Census data. The 2001 Census shows that travel to Oxford has increased from 9,626 trips in 2001 to 10,600 trips in 2011, remaining at 16% of travel to work trips. Table 7.51 shows a CE Employment Projection dated June 2010 of 8,600 jobs 2012-2029.
- 2.10 Table 6-3 of the Report identifies Vacant and Developable Land of 112 hectares, including 64 hectares at Harwell Campus, 28 hectares at Milton Park.
- 2.11 There is estimated to be a demand for 140-146 hectares in Table 2, and a Supply of 112 hectares in Table 6-3. The evidence therefore suggests the need for 28-34 additional hectares of employment land. It is unclear as to which Scenario this demand estimate is made. If it is for the Planned Economic Growth Scenario, the Inspector is asked to seek a revision note setting out estimated demand and supply for each Scenario.

## **2.12 ESTIMATED DEMAND AND SUPPLY OF EMPLOYMENT LAND**

Demand (Table 2)	140-146 hectares
Supply (Table 6-3)	112 hectares
Future Potential Supply (Table 6-5)	180 hectares
Requirement (Demand minus Supply)	28-34 hectares.

2.13 Page 53 of the Employment Land Review Mar 2013 deals with historic floorspace trends, employment trends and future employment forecasts. It says the analysis of the historic rate of change can be used as a proxy for the future rate of change. It does not use the conventional method of converting employment projections to floorspace using employment densities. In Table 7.2 it estimated a growth from 224,000 sq.m to 393,000 sq.m. in offices (+169,000 sq.m.) and an additional 98,000 sq.m. of factories and warehousing, 1998-2008.

2.14 The Inspector is asked to request the Council to provide an analysis of employment planning permissions for a recent 10 year period to substantiate this evidence. This information is normally available in Annual Monitoring Reports or Employment Land Reviews. The data provided in Table 7.11 of the Report shows a net gain of 450 sq.m. of B Class Development since 2008 (to 2012?) and no factory or office development being built, with a net gain of 12,342 sq.m. in the pipeline, using the Council's development activity database. It is unclear whether or not this just relates to land in the EZ.

2.15 By comparison, in Table 7.14, the estimated demand outside the EZ is estimated to be at the lower end of 270-307,000 sq.m. of office floorspace, 26-29,000 sq.m. of factories and 94,000-105,000 sq.m. of warehousing, giving a total demand outside the EZ for 23-26 hectares of employment land for factories and warehousing, and 24-28 hectares for offices, in Table 7.16. The summary table 7.17 shows a demand for 92 hectares within the EZ and 48-53 hectares outside it, making a total demand for 140-146 hectares, as set in Table 8-2.

## **2.16 IT IS CONCLUDED THAT THERE IS INSUFFICIENT CREDIBLE EVIDENCE TO SUPPORT 219 HECTARES OF EMPLOYMENT LAND.**

## 11.

### APPENDIX 1. NATIONAL ADVICE

The PPG paragraph 15 ref: 2a-015-20140306 identifies the starting point of housing need assessments as the CLG population and household projections. The most recent (2012 based) updates the 2011 based interim projections to be consistent with ONS population projections. Further analysis of household formation rates as revealed in the 2011 Census will continue in 2015. Local changes should be clearly explained and justified.

It may be appropriate to adjust projections to reflect market signals. It is not considered that land prices, house prices, rents, affordability or overcrowding, is significantly different in The Vale to the adjoining Districts in Oxfordshire, as indicated in the SHMA. Thus, there is insufficient evidence to adjust household projections for these reasons. There has been under delivery of housing, and the SHMA includes proposals to make up the shortfall.

The PPG ref: 2a-030-20140306 provides advice on how the current situation on economic needs should be assessed. It requires the Council to consider:

- recent patterns of land supply and loss based on recent planning permissions,
- the existing stock of employment land to determine future requirements e.g. recent take up rates
- locational and premise requirements,
- projections based on past trends and forecasts.
- Qualitative and Quantative needs
- To consult relevant organizations
- To analyse supply and demand to identify under or over-supply.

It is considered that these requirements have not been met in full, in particular the analysis of supply and demand to determine whether there is over or under-supply. The evidence indicates a significant over supply, and yet the Plan proposes significant additional employment land based on unrealistic employment forecasts.

## APPENDIX 2. 2012 Based CLG POPULATION & HOUSEHOLD PROJECTIONS

The differences in population growth between the SHMA and the 2012 based SNPP projections are given below:

	<b>2012 BASED CLG POPULATION PROJECTIONS</b>			<b>2014 SHMA</b>
	2012	2031	Change 2012-31	Alt Population
OXFORDSHIRE	631	700	+69	+107
CHERWELL	140	155	+15	+18
OXFORD	134	148	+14	+37
SOUTH OXON	133	145	+ 12	+16
THE VALE	120	132	+12	+17
WEST OXON	105	119	+14	+18

It can be seen from Table 1 above that the 2012 based CLG projections for The Vale are 5,000 population lower than the 2014 SHMA Alternative Population Baseline. They also address the issues of student population and migration in Oxford by adding an additional 14,000 additional population 2012-2031 compared with the 2011 Interim SNPP projections, in Table 3.1 of the Feb 2014 Cambridge Econometrics (CE) Report.

The table below shows that the 2014 SHMA estimates of housing need to be more than double that in the 2012 based CLG household projections:

	<b>2012 BASED HOUSEHOLD PROJECTIONS</b>			<b>2014 SHMA</b> (Dwellings) Alt. Population
	2012	2031	Change	
OXFORDSHIRE	263	304	+41	+100
CHERWELL	57	68	+11	+23
OXFORD	56	63	+7	+28
SOUTH OXON	55	63	+8	+16
THE VALE	50	58	+8	+21
WEST OXON	45	53	+8	+13