

# South Oxfordshire Local Plan 2034

## Publication Version Representation Form

**Please return by 5pm on Monday 18 February 2019 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

This form has two parts:

**Part A** – contact details

**Part B** – your comments / participation at oral examination

### Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

|                                  | 1. Personal Details                                   | 2. Agent Details (if applicable) |
|----------------------------------|---|----------------------------------|
| Title                            | <input type="text" value="Mrs"/>                      | <input type="text"/>             |
| Full Name                        | <input type="text" value="Helen"/>                    | <input type="text"/>             |
| Job Title (where relevant)       | <input type="text" value="Marshall"/>                 | <input type="text"/>             |
| Organisation<br>(where relevant) | <input type="text" value="CPRE OXFORDSHIRE"/>         | <input type="text"/>             |
| Address Line 1                   | <input type="text" value="20 High Street"/>           | <input type="text"/>             |
| Address Line 2                   | <input type="text"/>                                  | <input type="text"/>             |
| Address Line 3                   | <input type="text"/>                                  | <input type="text"/>             |
| Postal Town                      | <input type="text" value="Watlington"/>               | <input type="text"/>             |
| Postcode                         | <input type="text" value="OX49 5AF"/>                 | <input type="text"/>             |
| Telephone Number                 | <input type="text" value="01491 612079"/>             | <input type="text"/>             |
| Email Address                    | <input type="text" value="campaign@cpreoxon.org.uk"/> | <input type="text"/>             |

**Part B – Please use a separate sheet for each representation**

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

**Meeting housing and employment needs, p 30 et seq. and Policy Strat 2.**

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

**The scale and location of development are inappropriate, based on faulty assumptions, and are almost certainly undeliverable. Nor do they properly reflect the balance required in paras 7 and 8 of the NPPF.**

The housing numbers are not “need” as defined by the new standard method, but the “requirement” which would result if the ill-advised dash for growth was realised. The Local Plan derives its housing numbers from the Oxfordshire Growth Deal, a contract with Government that the Councils between them will build 100,000 new houses in return for £215 million. It is referred to as a Faustian Pact as, like Dr Faust, the Local Authorities were so keen to take the money that they overlooked the magnitude of the consequences, which are laid out below for South Oxfordshire, one of the signatories, and apply equally across the whole County.

The effect of the Growth Deal for South Oxfordshire, is that 28,465 new homes are planned to be built between 2011 and 2034 (see 5.11), being 22,775 required to meet the deal plus a surplus of 5,960 (20%) to ensure the Deal is achieved. Of these 4,950 are the “unmet need” of Oxford. These do not derive from any Oxford Local Plan, since none has been completed, but from an untested assessment by the Growth Board of Oxford’s capacity to meet its 2014 Strategic Housing Market Assessment (SHMA) derived housing requirement.

South Oxfordshire’s opening housing stock in 2011 was 54,000, on which the Plan represents a 50% increase. Given that only 4,500 houses have been built during the Plan period to date, around 650 per year, that leaves 24,500 during the remaining 15 years, a build rate of 1,633 a year on average, or 2.5 times the build rate to date. Looking at that another way that would be an increase in the housing stock of 2.5% for every remaining year of the Plan, six times the rate of the preceding ten years.

Even if the 5,960 contingency were not built out it would still be 1,236 houses a year, way beyond any past achievement.

Development on this scale is almost certainly undeliverable, beyond the capacity of communities to absorb, or infrastructure to service, harmful to the environment on which all sides acknowledge South Oxfordshire's prosperity belongs, and severely damaging to the Green Belt which 75% of South Oxfordshire's residents believe should remain intact despite housing pressures.<sup>1</sup>

### **Underlying Forecast**

The Growth Deal which drives the Plan is not a housing need forecast as both the Plan and the Growth Deal contract acknowledge.

The Plan states that the deal "derives its aspirational housing target from the Oxfordshire SHMA". But the Oxfordshire SHMA is out-of-date and will be over five years old by the time this Plan is examined. The Government forecasts that underpin it, the household formation projection and the population forecast, have both been revised in 2016 and both have reduced. The Government itself has abandoned the SHMA calculation – which CPRE exposed from the start as containing substantial double counting as well as masquerading as "need" when it was in fact a growth plan – and replaced it with the new Objectively Assessed Need (OAN).

It is true that the new OAN is a floor not a ceiling for preparing housing forecasts but the OAN figure does more accurately reflect the actual underlying need of South Oxfordshire households for homes and has the added benefit of making both the Objective Assessment and the growth strategy overlaid on it more transparent.

The OAN calculation is itself flawed however by adding an uplift intended to reduce prices when all experience is, and the seminal Kate Barker report confirmed, that you cannot build your way out of high house prices, the best you can hope to do is to slow the rate of house price inflation.

The household formation projections are a more realistic guide to actual local need in South Oxfordshire, although even these are not entirely reliable as they contain an extrapolation of past growth. The household projections indicate a requirement for 10,000 new homes in South Oxfordshire over the Plan period, 435 houses a year, a quarter of the build rate planned from now, and a third of the total housing numbers in the proposed Plan.

### **Social and Infrastructure Implications**

Assuming that the household formation projections are the most reliable indicator of real housing need, including that produced by economic growth at previous levels, that means that if the 28,465 houses are built 18,465 will be occupied by incomers to South Oxfordshire.

That in turn at average occupancies means an above trend increase in the South Oxfordshire population (at 2.1 per household) of 39,000 people, or population growth 30% above long-term trend. At 6.10 the Economic Forecast assumes that 12,403 new jobs will be created to 2033 (sic). Assuming that this is correct, and ignoring likely job losses over the Plan period, this means less than one new job per new home, or, alternatively, assuming conservatively that most new homes will be of two wage earners, that of the 39,000 new residents attracted by the houses 70% will not be employed locally but will, presumably, be London commuters, facilitated by the improved rail links.

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<sup>1</sup> **Attitudes to the Oxford Green Belt Survey, 2015:** <http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbiIsIidncmVlbiIsImdyZWVuJyIsImJlbHQiLCJiZWx0JyIsImJlbHQnLCIsImJlbHQnLiIsImJlbHQncyInN1cnZleSIzImdyZWVuIGJlbHQiLCJncmVlbiBiZWx0IHN1cnZleSIzImJlbHQgc3VydmV5IiI0=>

Apart from the impact of the development itself on the rural nature of the District, which is acknowledged to be of key importance to its high value economy, growth on this scale will stress roads, schools, and infrastructure generally as well as placing great strain on community cohesion.

### **Deliverability and its implications**

The Plan implicitly assumes that the build rate can be stepped up from 650 a year to 1,600 a year “overnight”. The longer the time to ratchet up the build rate, the greater the rate will need to be in the following years.

Not only that but all of the Oxfordshire Councils are assuming a similar exponential increase in build rate and competing for the same building capacity.

The situation is well-expressed in the Plan for the neighbouring Vale District which states *935 dwellings per year will need to be delivered between 2021 and 2031 (excluding past backlog). This rate of delivery is nearly double the historic long-term housing delivery rate in the District and will be extremely challenging for the house building industry to deliver.*

Achieving Plan levels means unjustifiable harm to the environment and social cohesion of South Oxfordshire. Failure risks opening the District to Planning by Appeal on a hitherto unprecedented scale – because the numbers are so much larger – and to developers cherry picking the most attractive sites – that is the most damaging green field sites in the Green Belt – and bypassing the most justified in Didcot and the Science Vale.

### **Oxford’s unmet need**

Oxford’s unmet need was calculated by the Growth Board team on the total housing forecast from the 2014 SHMA – 28,000 houses – and an assumption that of these only 13,000 could be accommodated in Oxford.

That left a “total unmet need” of 15,000 which was allocated to Districts primarily on the basis of their offer of sites to accommodate it.

The unmet need figure has no robust foundation in fact or argument. Equally valid assumptions between 26,000 and 14,700 could be made, even assuming Oxford’s strategy remained unchanged. If, as CPRE and the new NPPF recommend, Oxford’s strategy was amended to use higher densities appropriate to a compact City (equivalent to those in Strat 5 of this SODC Plan) half the assumed unmet need would be eradicated. Utilising land ring-fenced for further employment for housing instead would eradicate the remainder.

In any event the 2014 SHMA on which the unmet need is based is now out of date and the underlying forecasts of household formation and population growth it contained have both been superseded.

CPRE’s submission to the Oxford City Plan is that both densities should increase and ring-fenced employment land be released. It is obviously more sustainable that available land should be utilised to relieve housing shortages within the City rather than, as is presently planned, to increase employment and thus ratchet up City housing shortages and consequent commuting.

This would have a neutral effect on the Growth Deal as the same number of houses could be planned, but they would be provided in the right place, and without the need for co-operation from neighbouring authorities.

In any case the SHMA figures are now out of date and unreliable, and the SHMA process has been abandoned by Government. The new Objectively Assessed Need calculation produces a figure of 14,920 total houses for Oxford which – even if Oxford’s capacity had been correctly assessed by the Growth Board team – would of itself reduce unmet need to 1,920 houses of which SODC’s allocation would be 634 rather than the present 4,950.

This all goes towards showing that the Oxford “unmet need” figure is at the very best unreliable and substantially overstated.

Certainly, for the purposes of requiring co-operation from neighbouring Councils and especially for determining whether exceptional circumstances exist for Green Belt release, weight should be given to the facts that:

1. Oxford has the capacity within its present boundaries to meet all of the present SHMA assessed housing requirement, and
2. The household projections are the only Government figures that define actual need, or by extension “unmet need”, as distinct from ill-advised growth aspirations (called “requirement”). Therefore, in calculating “need” for the purposes of imposition on neighbouring authorities, or especially for determining whether “exceptional circumstances” exist for Green Belt release, the household projections or the Government’s Objectively Assessed Need calculation should be used. This is the only reasonable interpretation of para 60 of the new NPPF which requires only “needs” from neighbouring areas to be considered and requires these to be calculated by the standard method.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

The Plan is fundamentally unsound and should be re-drafted based on the appropriately assessed needs of local residents.

Any additional growth should be modest in scale; at a rate which can be absorbed without harm to the rural nature of the District, or to the cohesion of its society; in sustainable locations outside the Green Belt and AONB; and deliverable.

(Continue on page 4 if necessary)

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? \*

Yes  No

\* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:  Date: 15.2.19  
*(this can be electronic)*

### Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit [www.southoxon.gov.uk/dataprotection](http://www.southoxon.gov.uk/dataprotection)

### Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

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