

**Submission by Radley Parish Council: August 2015**

**Matter 1 – Duty to Co-operate and other Legal Requirements**

*1.1 Has the Council satisfactorily discharged its Duty to Co-operate to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, including in particular minerals and waste and housing? (see also Matter 4)*

No – see comment under Matter 4.

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**Matter 2 – Objectively Assessed Needs for Housing and Employment Land**

National Policy dictates that the SHMA should use as its starting point the official household projections as produced by the Department of Communities and Local Government (DCLG). Allowance is made for adjustments for local data and market signals but these need to be reasonable and we find those in the SHMA to be excessive. They lead from an annual increase in housing of 367 using the DCLG figures to an annual increase of 1028 using the “committed economic growth” projection (SHMA table 39).

*2.1a Are the SHMA demographic adjustments to the 2011 CLG Household projections soundly based?*

We would argue that they are not.

Most people would acknowledge that rises in house prices have given rise to a slowdown in household formation most evidenced by the increasing numbers in their 20s and 30s living with their parents or in shared rented accommodation. We do not have to rely on anecdote as the census statistics back this up showing a slight rise in average household size between 2001 and 2011.

Rather than recognising the reasons for this rise G L Hearn consider that it must be an anomaly. On the basis of no acknowledged evidence they project a fall in average household size from 2.51 to 2.39 over the plan period (SHMA figure 51). Their argument seems to be that we should ignore the last 10 years and plan on the basis of pre 2001 trends. This is in stark contrast to the rationale for some of their other “adjustments” and suggests that they are only interested in moving the final figure in one direction.

SHMA table 26 shows a level of vacant and second homes in Oxfordshire of 4.2%. Rather than accept that measures may be brought forward to try to reduce vacant homes G L Hearn propose that an extra 4.2% of homes should be built to retain this level.

*2.1b Is it appropriate to include an allowance for addressing past shortfalls in delivery of housing against the SE plan housing requirements*

We feel that the danger of this is that it takes no account of whether the previous plan requirements were in fact justified. While not commenting specifically on the previous projections we are sure that the current SHMA exaggerates the housing requirement. In 20 years time will an adjustment be made for shortfall on the current plan be made in such a manner, or will there be some account taken of the way the previous figure was arrived at? There seems to be a danger of forever trying to catch up with unrealistic forecasts.

*Matter 2.1 ci. Is the SHMA adjustment to take account of forecast economic growth as in the CE/SQW document soundly based?*

We would argue that it is not.

By far the largest increases in the assessed housing requirement for the Vale comes from the expectation of economic growth. Whilst the baseline expectation of global growth of 4.5% for the next 20 years seems optimistic, it pales into insignificance compared to the aspirational figures for individual industries in the District.

These figures all come from a study by Cambridge Econometrics and SQW. They appear to have based their assessments primarily on optimistic bid documents rather than actual statistics.

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The Cambridge Econometrics/SQW document is difficult to criticise in detail as it includes very little of the background data and assumptions and no details of the model used for the projection as this is considered commercially confidential. We are simply asked to put our trust in experts.

We have looked in detail at two sectors of the economy and find the forecasts deeply questionable. We have no reason to believe the forecasts for other sectors are more credible.

The first sector is agriculture. Table 2.2 predicts a 109% increase in agricultural employment during the period 2011-2021. This can be set against decades of statistics showing a steady decline in agricultural employment. Also in our Parish alone three strategic sites are planned for prime agricultural land and as that is replicated across the district that adds a significant risk of a further reduction of employment in the sector. When G L Hearn were questioned on this they made the following reply, which we quote in full if only because it is the only reply from G L Hearn that has reached the public domain:

“The agricultural employment data at district level is based on the Business Register and Employment Survey (BRES), which does not include farm agriculture. This data, however, is scaled to more robust regional data published by ONS. The baseline predictions are based on the assumption that historical relationships between growth in the local area relative to the South East or UK (depending on which area that industry has the strongest relationship with), on an industry-by-industry basis, continue into the future. Thus if growth in agriculture in the local area outperformed agriculture in the region (or UK) as a whole in the past, then it will be assumed to do so in the forecast period. Similarly if it underperformed the South East (or UK) in the past then it will be assumed to underperform the region (or UK) in the future. The projections are consistent with CE's latest forecast for the regions and nations of the UK at the time of work, which was the May 2013 forecast”

We find this explanation deeply obscure and unconvincing.

The second sector we looked at is space science and satellite technologies. On page 21 of their report CE confidently predict 10,000 new jobs in space science and satellite technologies in and around Harwell by 2031. They do make allowance that some of these jobs will be outside the Vale district and that some have already been included as part of the Science Vale Enterprise Zone (EZ) figure. One might expect such a figure to be based on a careful independent study of the sector but it looks more like a back of an envelope calculation.

The only source quoted is a press release from the Department of Business, Innovation and Skills from November 2012: “UK space industry set to rocket with £240 million of investment”. This press release was timed to coincide with a speech by George Osborne to the Royal Society at a time when he was under pressure for cutting core science funding.

CE claim “The government estimates that space science will grow from a £9bn industry now to one worth £40bn by 2031, generating 100,000 new jobs.” What David Willetts, Minister for Science and Universities, actually talked of was an ambition (not a certainty) for a £30bn industry by 2030, £10m less than the figure CE claim as a formal Government estimate<sup>1</sup>. The figure of 100,000 jobs comes from the co-chair of the Space Leadership Council, who might reasonably be considered to have an interest in talking up the potential of his industry. The recently published “Case for Space” states that current UK wide space employment stands at 37,000.

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<sup>1</sup> Department for Business, Innovation and Skills Announcement. [UK space industry set to rocket with £240 million of investment](#). 9 November 2012.

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CE then claim that “a reasonable assumption is that one tenth of the national growth in space science jobs by 2031 will be based in and around Harwell”. There is absolutely no statistical justification for this assumption.

The EZ has been running for three years. The figure of 5040 net extra jobs by 2030 is taken straight from the bid document. No account has been taken of actual progress. The minutes of the Executive Board of the Oxfordshire Local Enterprise Partnership (LEP) from 12/05/15 state that since the start of the EZ Harwell's growth has been slow and behind forecast. The original Joint Venture partners Goodmans were replaced 18 months ago but the new partners do not seem to be doing any better.

*Matter 2.1 c ii Is there evidence that the forecast employment growth would give rise to demand for new housing within the Vale of White Horse district?*

There are two issues here. First in paragraph 5.55 of the SHMA it states that no adjustments will be made to take account of changes in commuting ratio since the 2001 census figures. It seems curious as it would not seem unreasonable to assume that increases in house prices in the district may have led to a higher number of employees commuting into the district from cheaper areas.

Also it is not clear how the extra number of jobs has been converted into extra requirement for housing. While the current jobs: housing ratio in the Vale is 1.3 this includes a large percentage of retired people, and also many who bought property when it was less expensive as a proportion of average income. As most of the new jobs will be taken by people moving to the district, we question whether enough account been taken of the fact that to purchase or rent property in the district now generally needs at least two incomes per household.

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### Matter 3 – Spatial Strategy and Housing Supply Ring Fence

*3.1 Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based? In particular:*

*(a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3) and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?*

Radley Parish Council considers that policy on the distribution of new housing land in CP4 is not soundly based. While not inconsistent with the settlement hierarchy set out in CP3, that policy is itself flawed. Further, the distribution proposed in CP4 does not adequately take account of some of the core planning principles in the NPPF (para 17). Specifically:

- i. The settlement hierarchy in policy CP3 **fails to deal with the question of the scale of development appropriate for larger villages**. This is crucial. Development on a modest scale around these villages could make sense in planning terms provided there was adequate infrastructure provision. But large-scale development that will overwhelm and destroy the existing character of the villages certainly does not. The policy is completely silent on the question of scale relative to the size of the existing community. The numbers proposed for Radley Parish more than double its current size<sup>2</sup>. Far from safeguarding the village character, this could in our view destroy it.
- ii. The settlement hierarchy in policy CP3 is also inadequate in that it **fails to address the question of separation of communities**. Land around Radley Village has been protected from development for decades by the planning authority and Planning Inspectors alike on the grounds that it is crucial to the continued separation of our community from Abingdon and from Kennington. CP4 envisages the development of large parcels of land which have been protected on these grounds over many decades. CP3 is again silent on this issue, providing no explanation or rationale for overturning the long-standing policy to protect communities from coalescence.
- iii. Whilst the proposals in CP4 are consistent with some of the 12 core planning principles in NPPF (para 17), including the requirement to make full use of public transport, they are inconsistent with others. In particular, the proposals **fail to reflect the NPPF requirement to take account of the different roles of different areas, including protecting the Green Belt around urban areas, supporting thriving rural communities and promoting the development and diversification of agriculture**. The housing proposals for the Abingdon and Oxford fringe area will destroy the character of some local communities, take out swathes of existing Green Belt and seriously weaken the local farming industry.

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<sup>2</sup> CP4 proposes a total of 1,100 new homes in Radley parish: 240 homes at the North West Radley strategic site; 390 homes in the Radley Parish area of the North Abingdon site; 270 homes in the South Kennington site; and around 200 homes at the South Radley site removed from the Green Belt and identified as suitable for Part 2 allocations. The village currently comprises some 650 homes in the main settlement and a further 250-300 mobile homes within the parish boundaries to the south of Kennington.

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**Matter 4 – Unmet Housing Needs**

*4.3 Is it likely that the spatial strategy, policies and allocations proposed by the plan to meet the district's own housing needs would need to be significantly altered if unmet needs from elsewhere in Oxfordshire are to be accommodated in the Vale of White Horse district?*

Yes. If the numbers and proposed allocations to meet Oxford's unmet needs are as in a paper considered by the Vale Cabinet on 7 August 2015<sup>3</sup>, then the spatial strategy and policies for the Abingdon and Oxford Fringe sub-area will need to be re-thought from first principles

The report provides a middle point estimate that the number of houses falling to the Vale to deliver to meet Oxford's unmet need will be 3000. It argues that 'good opportunities exist to meet unmet need' in the Abingdon and Oxford fringe sub-area, while for the other two areas of the Vale it is 'unclear how development could meet unmet need'. The implication is that most of the estimated 3000 homes required to meet Oxford's needs will need to be built in the Abingdon and Oxford fringe sub-area.

Taking into account also the 722 dwellings identified in CP8 as needing to be found in this area under Part 2 allocations, it appears that the Vale is proposing that something in the order of a further **3,500** homes should be built in the Abingdon and Oxford fringe sub-area on as yet unidentified sites. This is over and above the **1,990** homes in strategic sites in the sub-area which are identified under CP4.

As set out under Matter 3, we are already extremely concerned about the impact of more than doubling the size of our community following development as envisaged under the CP4. The policy set out in CP3 is not fit to provide an adequate planning basis for the siting of the 1,990 new homes currently proposed in the Abingdon/ Oxford fringe sub-area, let alone a further 3,500 homes in the area. We do not begin to understand how this many houses can be accommodated simply by further incremental expansion of Abingdon and the larger villages. It is essential that development on this scale, if it must happen, should be rethought from first principles.

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<sup>3</sup> *Planning to address Oxford unmet housing need in the Vale of White Horse.* By the Vale's Head of Planning