

Home Builders Federation

Matter 1

SOUTH OXFORDSHIRE LOCAL PLAN EXAMINATION

Matter 1. Is the housing requirement soundly based?

a. The figure of 775 dpa comes from the Oxfordshire SHMA 2014; the local housing need (LHN) figure derived from the standard method is 627 dpa. Have appropriate factors been applied to reach the housing requirement figure?

1. Paragraph 60 of the National Planning Policy Framework (NPPF) states that the local housing needs assessment arrived at using the standard method is the minimum number of homes that Councils should plan for and goes further in paragraph 2a-010 of Planning Practice Guidance in setting out some of the scenarios where increases in housing needs are likely to exceed past trends. These scenarios include the need to support growth strategies for an area, where strategic infrastructure improvements are likely to drive in increase in needs and where there is agreement to take on the unmet needs of a neighbouring authority. In addition, paragraph 2a-010 also requires consideration to be given to previous assessments of growth.
2. What is evident from the Council's Housing Topic Paper (TOP1) is that the relevant factors set out in national policy and guidance have been considered in arriving at the housing requirement of 775 dpa. In line with PPG the Council have considered the impacts of the Growth Deal, and the strategic infrastructure improvements this will bring, and the implications this will have on future housing needs. It is evident that these improvements will see increases in economic activity which will, in turn, mean that housing needs will have to exceed past trends and the minimum levels of housing need arising from the standard method to support expected levels of economic growth. In rejecting options for lower growth the Council have highlighted these important considerations within their decision to plan for housing needs above the standard method, and as such we would consider the Council approach to reaching their stated housing needs assessment for South Oxfordshire of 775 dpa to be sound.

b. What are the implications of extending the plan period as proposed?

3. Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption. Given that the plan will not be adopted until 2021 at the earliest it is necessary for the plan period to be extended until



2035/36. At present the Council has proposed to extend the period by a single year to 2034/35 but a further adjustment is required in order to ensure conformity with the NPPF.

4. The implications for such an extension for South Oxfordshire would be to increase the housing requirement for the area by 1,550 homes to 24,325. It would appear from the Council's housing trajectory, if it is accurate, that there is sufficient capacity to meet this level of need.

c. Is there an appropriate component within the stated housing requirement for meeting the unmet needs arising from Oxford City, having regard to the findings of the Inspector's report into the submitted Oxford City Local Plan? What should that figure be?

5. In line with the paragraph 60 of the NPPF and paragraph 2a-010 of PPG we would agree with the Council that it is necessary and appropriate for the proposed increase to its housing requirement in order to address the unmet needs identified in Oxford City. As established through the hearings and then in the inspector's report the level of need arising in the city is 1,400 dpa.
6. In our representations we were concerned that the unmet needs arising in Oxford City had been underestimated by the Council. As the Inspector will be aware at that time the Oxford City Local Plan was considered to have a capacity during the plan period 2016 to 2036 of 8,620 homes. Following the examination of the Oxford City Local Plan that capacity has increased to 10,884 dwellings¹. Whilst this increase in the expected level of residential development is welcomed, we remain concerned that even with this additional capacity there will continue to be a shortfall in the housing requirements for the county over the 2011 to 2031 period. Using the latest delivery expectations presented by Oxford City Council at the examination of their local plan they will deliver 11,142 homes against needs of 28,000 for that period. A shortfall of circa 16,800 homes. Oxford's housing delivery between 2011 and 2031 is set out in the table below alongside the housing requirements for the rest of Oxfordshire and shows that during this period there is a shortfall against the assessed needs for the county of 100,000 homes between 2011 and 2031.

Table 1: Shortfall in housing requirements to address Oxford City's unmet needs

| LPA | LPAs housing requirement (2011 to 2031) | Homes in housing requirements to address Oxford's unmet needs | Total housing requirement (2011 to 2031) |
|------------|--|--|---|
| Cherwell | 22,800 | 4,400 | 27,200 |
| Oxford | 11,142 | n/a | 11,142 |
| S Oxon | 15,500 | 4,950 | 20,450 |
| Vale of WH | 20,560 | 2,200 | 22,760 |

¹Paragraph 41 Oxford Local Plan 2036 Inspectors' Report 15 May 2020

| | | | |
|--------|--------|--------|--------|
| W Oxon | 13,300 | 2,750 | 16,050 |
| Total | 83,242 | 14,300 | 97,542 |

7. This evidence shows that an additional 14,300 homes have been identified in other local plan housing requirements to meet Oxford City's unmet needs. In arriving at these additional requirements, the working assumption made by the Councils was that Oxford would have capacity to deliver 13,000 homes between 2011 and 2031². In addition to this supply of 13,000 it would appear that Oxford City Council also committed to the delivery of an additional 550 homes to address its own unmet needs³. However, as has been confirmed at the examination Oxford City Local Plan total delivery for the period of that plan - 2016 and 2036 - will be 10,884 homes. Based on actual delivery in Oxford between 2011/12 and 2018/19 of 2,587 homes and forecast delivery of 8,555 homes between 2019/20 and 2030/31 means that delivery between 2011 and 2031 will, as mentioned earlier, amount to 11,142 homes. This shortfall against the initial estimates means that the requirements in local plans across Oxfordshire are some 2,500 homes short of the 100,000 homes needed in the county during that period. More specifically it is 2,500 homes short of the 28,000 homes identified as being required to meet the housing needs of Oxford where affordability and needs are most acute.
8. However, further to the above concern, is the shortfall against what Oxford City is required to deliver between 2011 and 2031. The stepped trajectory set out in the recently adopted Oxford City Local Plan means that the City is only required to deliver 9,473 homes between 2011 and 2031⁴. As such, should only the requirements in each authority across Oxfordshire be delivered this would leave a shortfall of circa 4,200 homes against the Oxfordshire's housing needs between 2011 and 2031.
9. Whilst this working assumption was clearly optimistic, it would appear, if estimates of delivery are accurate, that the buffer in provision across Oxfordshire should address this shortfall. However, setting aside the expected levels of delivery and focussing on requirements within local plans we would suggest that there should be an increase in the requirement in the South Oxfordshire Local Plan between 2021 and 2031 to take account of the shortfall. This will ensure effective monitoring against the shared objective for housing delivery for the county and should delivery not be as expected that additional sites can be brought forward. Therefore, the question that must be considered at the examination is the degree to which South Oxfordshire's housing minimum requirement should be increased to reflect the shortfall between needs and stated requirements.

d. Does the plan provide for sufficient affordable housing?

² Cherwell Part 21 local plan Partial Review – Oxford's Unmet Housing Need – paragraph 1.28

³ Paragraph 3.11 of SCG01

⁴ Comprising of 1,428 delivered between 2011/12 and 2015/16, requirement of 475 dpa between 2016/17 and 2020/21 (2,375) and requirement of 567 dpa between 2021/22 and 2030/31 (5,670).

10. No comment

e. To conclude, and leaving aside (for the moment) the stepped trajectory, what average annual figure should constitute the housing requirement, and what would that figure be over the plan period?

11. We would agree with the Council's conclusion that the annual average housing requirement for the Council would be 775 dwellings per annum. This annualised amount should be applied over an extended plan period to 2035/36. This would give a total requirement for South Oxfordshire alone as 18,600 homes for the period 2011/12 and 2035/36. However, the unmet needs within Oxford City which are to be delivered between 2021 to 2031 will need to increase to take some account of the final agreed capacity within the city.

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