

## Home Builders Federation

### Matter 2

#### SOUTH OXFORDSHIRE LOCAL PLAN EXAMINATION

#### **Matter 2. Is the housing trajectory deliverable, and what is the position with housing supply overall, and for a rolling 5-year period?**

##### *a. What is the overall headroom – the figure for completions, commitments, allocations and windfalls, compared with the housing requirement?*

1. This is primarily for the Council to answer and provide the most up to date evidence on this issue. From the evidence provided, and if it is an accurate reflection of future supply, it would appear that the Council can show significant headroom between its housing requirement as set out in STRAT2 and the expected level of supply. On the basis of the revised trajectory in PSD26 the headroom is circa 24% above the housing requirement. Whilst this may seem a significant buffer between the requirements and supply it is important to recognise that the Council is relying on strategic sites to deliver the majority of its housing supply. Such a strategy means there is a greater risk to housing supply should there be delays in the delivery of such schemes or should they not come forward at the rates expected.
2. We note that the Council are expecting delivery rates of up to 250+ dwellings per annum (dpa) on some of the allocated sites and whilst this is possible it is by no means certain. The recent update to the “Start to Finish”<sup>1</sup> report by Lichfields examining the delivery of strategic scale sites shows that it takes time to for such sites to start delivering and whilst delivery at high rates can be achieved it is by no means certain. On the issue of delivery, the report outlines on page 11 that one site of over 2,000 homes delivered 414 dpa in one year but that was significantly higher than the 147 dpa average for the scheme. The average delivery from developments of over 2,000 dwellings assessed in the study was 160 dpa and for schemes of between 1,500 to 1,999 that average falls to 120 dpa. We recognise that all developments are unique and some can deliver at higher rates but given the Council’s proposed strategy it is sensible and appropriate to plan for levels of development that are higher than their stated requirement in order to minimise the inherent risks.

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<sup>1</sup> Start to Finish (Second Edition) (Lichfields, 2020) <https://lichfields.uk/content/insights/start-to-finish>



*b. Is the stepped trajectory soundly based?*

3. PPG outlines that stepped trajectories may be appropriate where there is a significant change in the level of housing required or where strategic sites have phased delivery. Evidence is required to support the use of a stepped trajectory. The Council's evidence to support the trajectory is set out in the Council's response to the inspectors' initial questions (IC1A). Whilst we do not disagree with the use of step trajectory in relation addressing Oxford's unmet needs, we have some concerns regarding the amended approach set out in IC1A.
4. The approach to the stepped trajectory set out in the submitted local plan reflects the position taken across Oxfordshire with regard to Oxford City's unmet housing needs in that the unmet needs of Oxford were added to the local requirement for the period 2021 to 2031. However, the Council have in IC1A proposed a different trajectory to that submitted which reduces the requirement in the years immediately following adoption and pushing back more deliver to the end of the plan period. The requirement in the submitted plan for the first full five years of the plan post adoption (2021/22 to 2025/26) would have required the Council to deliver 5,775 homes. The adjusted trajectory would now require the Council to deliver 4,939 (this includes backlog from earlier in the plan period) homes in the same period. It would appear that the Council are seeking to unnecessarily push back the delivery of homes in the adjusted trajectory.
5. The Council state that this is to ensure a strong five-year land supply across the remaining plan period. However, we would argue that it is more important to ensure stepped requirements, where they are used, press the delivery of new homes as much as possible and do not seek to reduce the effectiveness of the intervention mechanism set out in the NPPF and PPG. By reducing the requirement in the first part of the plan period would delay the point at which both the Housing Delivery Test and presumption in favour of sustainable development are applied and push back any response and, potentially, lead to housing needs not being addressed. Given the affordability concerns across the county and in particular the scale of this issue in and around Oxford it is important that such interventions are not delayed unnecessarily. On the basis that the Council are able to show a five-year land supply on the existing trajectory there does not appear to be any justification or need for the proposed amendment as suggested in IC1A. If the Council are confident in their delivery expectations, they should not need further headroom as is being proposed in the modified trajectory.
6. As commented on in our matter 1 statement we also consider an increase in the overall requirement will be necessary to take account of the additional unmet needs in Oxford. There is a shortfall of circa 2,400 homes that must be delivered by 2031 in order to meet identified needs and this cannot be ignored.

*c. Will it be robust in the light of any foreseeable variations in the start dates or delivery rates of the allocations and commitments? (At this stage only headline points should*

be made in respect of risks to the delivery trajectory; I will be looking at the timing of infrastructure and delivery rates when dealing with the individual site allocations.)

7. The HBF does not comment on the deliverability of specific sites. However, as highlighted above the proposed strategy to deliver a high proportion of new homes on larger sites does pose greater risks to deliverability. Whilst we welcome the strategic allocations the trajectory in PSD26 shows that 64% of housing between 2019/20 and 2034/5 will come forward from sites of 500 homes or more. This is a significant proportion of overall delivery and there is a significant risk to the overall provision of new homes should any of these sites be delayed or delivery is not as expected.
8. If it is considered that the difficulties in bringing forward strategic sites may require reductions in delivery rates from any of these sites then we would suggest that rather than adjusting trajectories to suit the allocated sites, which would push delivery back even further, that additional sites are allocated for development earlier within the plan period that are likely to ensure the necessary supply.

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## Appendix 1. Rolling five-year land supply assessment

### Trajectory used in submitted local plan

Year	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
Requirement	775	775	775	775	775	775	775	775	775	775	1270	1270	1270	1270	1270	1270	1270	1270	1270	1270	775	775	775	775
Cumulative	775	1550	2325	3100	3875	4650	5425	6200	6975	7750	9020	10290	11560	12830	14100	15370	16640	17910	19180	20450	21225	22000	22775	23550
Delivery	508	475	484	600	608	722	967	1337	1469	1391	1485	1193	1073	1446	1560	1782	1525	1519	1564	1451	1456	1386	1257	1262
Cumulative	508	983	1467	2067	2675	3397	4364	5701	7170	8561	10046	11239	12312	13758	15318	17200	18925	20694	22358	23995	25587	27109	28502	29900
Deficit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Five-year requirement	3,875	3,875	3,875	3,875	3,875	3,875	4,370	4,865	5,360	5,855	6,350	6,350	6,350	6,350	6,350	6,350	5,855	5,360	4,865	4,370				
Add deficit	3,875	4,142	4,442	4,733	4,908	5,075	5,623	5,926	5,859	5,855	6,350	6,350	6,350	6,350	6,350	6,350	5,855	5,360	4,865	4,370				
Buffer	194	207	222	237	245	254	281	296	293	293	318	318	318	318	318	318	293	268	243	219				
Total requirement	4,069	4,349	4,664	4,970	5,153	5,329	5,904	6,222	6,152	6,148	6,668	6,668	6,668	6,668	6,668	6,668	6,148	5,628	5,108	4,589				
Five-year supply	2,675	2,889	3,381	4,234	5,103	5,886	6,649	6,875	6,611	6,588	6,757	7,054	7,386	7,832	7,950	7,841	7,515	7,376	7,114	6,812				
Surplus/deficit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5YHLS	3.29	3.32	3.62	4.26	4.95	5.52	5.63	5.52	5.37	5.36	5.07	5.29	5.54	5.87	5.96	5.88	6.11	6.55	6.96	7.42				

### Proposed main modification to the trajectory

Year	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
Requirement	900	900	900	900	900	900	900	900	900	900	900	900	900	900	900	1120	1120	1120	1120	1120	1120	1110	1110	1110
Cumulative	900	1,800	2,700	3,600	4,500	5,400	6,300	7,200	8,100	9,000	9,900	10,800	11,700	12,600	13,500	14,620	15,740	16,860	17,980	19,100	20,220	21,330	22,440	23,550
Delivery	508	475	484	600	608	722	967	1337	1469	1391	1485	1193	1073	1446	1560	1882	1725	1769	1664	1637	1592	1522	1393	1398
Cumulative	508	983	1,467	2,067	2,675	3,397	4,364	5,701	7,170	8,561	10,046	11,239	12,312	13,758	15,318	17,200	18,925	20,694	22,358	23,995	25,587	27,109	28,502	29,900
Deficit	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Five-year requirement	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,500	4,720	4,940	5,160	5,380	5,600	5,600	5,590	5,580	5,570				
Add deficit/surplus	4,500	4,892	5,317	5,733	6,033	6,325	6,503	6,436	5,999	5,430	4,939	4,720	4,940	5,160	5,380	5,600	5,600	5,590	5,580	5,570					
Buffer	225	245	266	287	302	316	325	322	300	272	247	236	247	258	269	280	280	280	279	279					
Total requirement	4,725	5,137	5,583	6,020	6,335	6,641	6,828	6,758	6,299	5,702	5,186	4,956	5,187	5,418	5,649	5,880	5,880	5,870	5,859	5,849					
Five-year supply	2,675	2,889	3,381	4,234	5,103	5,886	6,649	6,875	6,611	6,588	6,757	7,154	7,686	8,382	8,600	8,677	8,387	8,184	7,808	7,542					
Defecit	-	-	-	-	-	-	-	117	312	887	1,571	2,198	2,499	2,964	2,951	2,797	2,507	2,315	1,949	1,694					
<b>5YHLS</b>	<b>2.83</b>	<b>2.81</b>	<b>3.03</b>	<b>3.52</b>	<b>4.03</b>	<b>4.43</b>	<b>4.87</b>	<b>5.09</b>	<b>5.25</b>	<b>5.78</b>	<b>6.51</b>	<b>7.22</b>	<b>7.41</b>	<b>7.74</b>	<b>7.61</b>	<b>7.38</b>	<b>7.13</b>	<b>6.97</b>	<b>6.66</b>	<b>6.45</b>					