

Sent by email to: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

27/03/2023

Dear Sir/ Madam

### **Response by the Home Builders Federation to the consultation on the Housing Needs Consultation**

Please find below the Home Builders Federation (HBF) response to the consultation on the housing needs for Oxford City. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

#### *Approach to identifying housing need in the HENA.*

Given the decision last year to cease work on the preparation of the Oxfordshire Joint Strategic Spatial Plan (JSSP) the HBF is pleased to see that Oxford City Council has, in partnership with Cherwell, decided to continue the work related to the housing needs of the County. In our response to the consultation on the JSP the HBF considered the most appropriate way forward was for the JSP to base its ambitions as a minimum on the economic development led scenario that expected current growth trends to continue. Given that the circumstances faced by Oxford and Oxfordshire remain the same with an acute shortage of housing to meet the economic aspirations of the city and county the scenarios considered are therefore reasonable and are those we would expect to be undertaken in a housing needs assessment.

The HBF also consider the methodology used in assessing each scenario to be reasonable and an appropriate basis on which to consider housing needs for both Oxford and Oxfordshire as whole.

#### *The most appropriate scenario of housing need.*

The HBF welcomes the Council's decision to consider whether the circumstances faced by Oxford warrant the adoption of an alternative method for assessing housing needs that results in a higher level of housing need than that proposed in the NPPF. It is clear that the Government is supportive of such a position with PPG stating that such



approaches should be considered sound where it adequately reflects current and future demographic trends.

What is evident from the consultation document and the HENA is that Oxford, and Oxfordshire in general, will face an acute shortfall in housing if it were to only meet the minimum number of homes required using the standard method. The evidence from the Census presented in the evidence indicates that there has been underestimates in population growth for Oxfordshire that leads to significant underestimation of needs using the standard method, therefore a higher level of housing need would align with future demographic trends. The Council also note that if economic growth continues as expected then housing needs are similar, though slightly lower, to those expected based on the latest Census data. As such the conclusion is that these form the most appropriate scenarios on which to prepare the local plan.

Whilst supportive of the Council's position that housing needs will clearly be higher than that arrived at using the standard method, we are concerned that the Council has dismissed the economic led scenario on the basis that there are risks that the economic development goals of the county may not be achieved. Whilst there are risks it can also be assumed that if the level of housing growth is insufficient to support the investment plans of the LEP and other partners then it is inevitable that these goals will not be achieved. The Council is at the heart of the revived Oxford Cambridge Growth Arc which is seeking to drive economic growth in this area. The focus of the Arc in its latest incarnation is on economic prosperity and it is important to recognise that this must go hand in hand with ensuring there are sufficient homes to support the area's ambitions.

The HBF would therefore suggest that the economic led development scenario remains a likely and realistic one and could form the basis for local plan development in Oxfordshire. We would therefore suggest that OCC seek to ensure this higher level of growth is supported through the duty to co-operate and its interactions with its neighbours and partners. Oxford is at the heart of the area's aspirations to be a world leading area for science and technology innovation and it must play a vital role in encouraging others to support the delivery of the homes needed across Oxfordshire to meet wider sub regional ambitions for economic growth.

### Housing capacity

Despite welcoming the approach taken by the Council with regard to housing needs assessments it will not be possible for the Council to meet its own needs. The Council is constrained by the surrounding Green Belt and a relatively tight boundary that clearly limits opportunities for the Council to deliver a significant increase in new homes. As such there will be a significant level of unmet needs arising as a result of this local plan. However, no consideration is given as to how these unmet needs will be met, or indeed how the Oxfordshire LPAs will respond to the housing needs set out in the Council's HENA which are clearly well beyond those arrived at using the standard method. Already we have seen both Cherwell and Vale of White Horse move away

from their growth based housing requirements in adopted local plans to the lower standard method through internal reviews of their local plans.

Therefore as part of the preparation of this local plan Oxford City will need to challenge their neighbours to do more through the duty to co-operate. Without the rest of Oxfordshire planning on the same basis as Oxford itself then the economic aspirations of this area, ones that are supported by the Government, will not be achieved.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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