

## Home Builders Federation

### Matter 3

#### Matter 3 Housing need and the housing requirement

##### **Issue**

*Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.*

##### **Questions**

#### **The HENA and housing need**

1. Why does the HENA seek to assess the housing need for Oxfordshire and all of the individual authorities? Is this justified?

This is largely for the Council to answer. However, the HBF would consider Oxford City Council (OCC) to be justified in considering alternative assessments of housing need across Oxfordshire. Up until relatively recently the local authorities in Oxfordshire have worked closely to establish the level of housing need for the county. The work undertaken by OCC and Cherwell District Council (CDC) has looked to continue that approach which recognises the interconnected nature of the economic and housing market across Oxfordshire and primary role Oxford plays in driving the economy of the county.

Indeed, understanding whether housing growth using the standard method across Oxfordshire would be sufficient to support economic growth would appear to the HBF to be key part of plan preparation for Oxford. The city is highly constrained with a tight border its urban edge as well as being surrounded by Green Belt. Given the city has few opportunities to expand it must rely on neighbouring authorities to meet some of



its development needs. Therefore, it is important for OCC to understand the number of homes required across the county to support the level jobs growth expected to 2040. This can then be used to assess whether the standard method is sufficient to support this growth, or indeed if the standard method is used elsewhere whether this figure when combined with the constrained level of supply in Oxford is sufficient to support the expected levels of jobs growth.

As OCC note in their topic paper the standard method does not account of economic trends and strategies. This is supported in PPG which states at paragraph 2a-010 that the standard method “... *does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates*”. As such it would have been remiss of OCC not to consider the impact of economic growth on housing needs and, given the constraints faced by the city, to consider these at a county level in order to properly assess the unmet needs arising within the city alongside the number of homes that must be provided elsewhere to support economic growth across the county.

*2. How does the HENA arrive at the four scenarios for housing need? What evidence sources and assumptions are used, are these appropriate and justified?*

The HBF considers the sources and assumptions used in the HENA provide a reasonable a basis for assessing housing needs and jobs growth in Oxford and across the County.

*3. What is the basis for choosing the CE Baseline scenario and departing from the standard method scenario? Is this justified?*

The reason for choosing the CE Baseline is for the council to answer. However, the HBF considers it justified for the council to depart from the standard method. Oxford and Oxfordshire have seen high levels of growth in previous years and the expectation is that this will continue to 2040. The HBF’s only concern, as set out in our representations, is that this scenario may underestimate the level of housing growth needed across Oxfordshire and consequently the level of unmet needs in Oxford.

4. What is the basis for choosing the apportionment between authorities based on the distribution of forecast jobs? Is this justified?

This is largely for the council to answer. HBF does not comment on what the most appropriate approach to distributing housing needs is across Oxfordshire, however apportioning housing needs in a county wide assessment on the basis of jobs growth is a reasonable and justified approach. An alternative approach to distribution may be arrived at on the basis of where the most sustainable locations for development as plans are prepared and agreements on distribution are reached, but this does not mean that the apportionment for the purposes of this plan is unjustified.

5. What are the objectives of identifying a housing need of 1,322 homes per annum (26,440 over the plan period) for Oxford City and what are the intended outcomes?

This is principally for the Council to answer. However, the NPPF states in paragraph 61 that the number of homes that need to be planned for should take into account needs that cannot be met in neighbouring areas. Therefore, where an LPA cannot meet housing needs in full it is essential that the level of unmet housing need is stated in policy to provide an agreed position as to what needs to be addressed elsewhere.

**Capacity within Oxford City and the resultant housing requirement**

6. How has the capacity to accommodate housing within Oxford City been assessed? Has the process been sufficiently thorough and robust? Could the capacity estimate be increased by altering assumptions or policy approaches? If so, what effect would this have?

No comment.

7. Is it appropriate to set the housing requirement to exactly match the identified capacity (notwithstanding the use of some discounting)? What implications would this have for future assessments of housing land supply? Should more flexibility be built in between the requirement and the estimate of capacity?

Where plans cannot meet housing needs it is common place for the requirement to meet supply. For example, the recently adopted Worthing Local Plan has a housing

requirement that reflects supply with the annual requirement being the average of total supply across the whole plan period. Whilst recognising this provides no buffer to take account of changing circumstances it is for the Council to ensure that its assumptions are realistic and don't overestimate what can be delivered. It is also the case that the paragraph 76 of most recent NPPF means that the Council no longer have to demonstrate a five-year land supply for the first five years following adoption. Should there be concerns when the plan is reviewed in five years' time that development is not coming forward as expected and there will not be a five-year land supply in future then the plan can be amended at that point.

### **Unmet housing need**

8. How and where is it intended to meet the unmet need of 841 homes per annum (16,828 over the plan period)?

For Council.

9. What agreements are in place to do this and what is the position of other authorities, including in relation to continuing commitments in existing adopted Local Plans?

For Council.

10. How do housing requirements in adopted Local Plans in other authorities compare with standard method calculations of housing need?

For Council.

11. Will the full unmet need realistically be delivered by other authorities?

For Council.

12. What are the implications for emerging Local Plans in these authorities?

As required by paragraph 11 and 61 of the NPPF they will need to take account of the level of unmet need arising in Oxford and plan to meet those needs in full unless the application of policies in the NPPF provide strong reason for restricting the overall

scale of development or the adverse impacts would of do so would demonstrably outweigh the benefits.

13. How would delivering unmet need in other authorities achieve the objectives and outcomes intended, for example in terms of commuting and addressing affordable housing needs in Oxford City?

This is principally for the Council to answer. However, re affordable housing, given that Oxfordshire is considered to be a single Housing Market Area ensuring the unmet needs of Oxford are addressed will allow for further affordable homes to be delivered as part of overall delivery. Whilst it is not possible assess how many affordable homes would be delivered as this is dependent on the sites allocated and the viability of those sites it is reasonable to assume that they would make a substantial contribution to the affordable housing needs of Oxford.

14. If Oxford City's housing need was calculated using the standard method, what would be the implications for the scale of unmet need and the potential for it to be met by other authorities?

For council.

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