

Home Builders Federation

Matters 2, 3 and 9

CHERWELL LOCAL PLAN EXAMINATION

Matter 2 – Unmet Need

Does the ‘working assumption’ that 4,400 homes is the correct apportionment of Oxford’s unmet need to Cherwell remain applicable?

Oxford City Council (OCC) have now published a proposed submission plan this outlines a commitment to deliver of 8,620 homes between 2016/17 and 2035/36. However, on the basis of the delivery trajectory plan and past delivery Oxford is expecting to see just under 9,500 homes built between 2011 and 2031¹. Given that the assessment of need for Oxfordshire was 100,060 – of which 28,000 was arising in OCC – this leaves an unmet need in the Oxfordshire HMA of 18,500, assuming all other authorities meet needs. Therefore, on the basis of the agreed apportionment of unmet needs set out in the MOU (PR28) the HMA is 4,200 units short of meeting needs. This is a considerably amount and whilst we have been supportive of the approach taken in Oxfordshire to facilitate growth consideration will need to be given across the HMA as to how this shortfall in addressing unmet need is addressed. As such the level of additional unmet need being delivered in Cherwell District Council (CDC) should be considered a minimum and it must be recognised that further development is likely to be required in Cherwell, and the rest of the HMA, following the examination of the Oxford City Local Plan.

Matter 3 – Spatial Strategy

If it does, is the strategy of directing the majority of the development designed to meet that need to land that is currently in the Green Belt soundly based?

We do not disagree with CDC’s decision to direct the majority of the development required to address Oxford’s unmet need to sites that are well connected to the City. The concerns regarding increasing cost of housing, affordable housing and the limited

¹ Delivery for period 2011 to 2025/26 is based on figure 2 of the 2017/18 Oxford City Council AMR. Figures for the period 2026/27 are based on diagram 3 in the Oxford City Council Proposed Submission Local Plan and as such are estimates as we could not find any exact figures for this year that had been published by the City Council.



ability of the city to meet needs within its urban areas are sufficient justification for amending Green Belt boundaries. However, whilst we would not disagree with the spatial strategy being taken forward should this approach not meet needs or provide sufficient development within the first five years then it would be an appropriate response for sites elsewhere in the HMA to be allocated in order to meet needs. The fundamental principle behind an HMA is that it is reasonable for housing needs in one LPA to be delivered elsewhere. This is also the reason why we would suggest that the housing needs identified to support Oxford City are not disaggregated from the rest of Cherwell's housing needs, a position we consider in more detail in our response to Matter 9.

Matter 9 – Other Policies

Are there any issues with the specific wording of Draft Policies (a) PR1; (b) PR2; (c) PR3; (d) PR4a; (e) PR4b; (f) PR5; (g) PR11; (h) PR12a and PR12b; and (i) PR13?

Policy PR12a – Delivering Sites and Maintaining Housing Supply

Our principle concern with regard to PR12a is the decision to disaggregate the delivery of the homes required to meet the needs of Oxford from those required to meet the identified needs of Cherwell. However, given that paragraph 47 of the NPPF states that LPAs should ensure their Local Plan meet the full objectively assessed needs for market and affordable housing in the housing market area we do not consider this approach to be sound. The purpose of identifying an HMA is to allow authorities to plan for needs across more than one area. This recognises that housing markets are not defined by local authority boundaries and that delivery in one LPA can reasonably be assumed to address the needs of another. This position has been reinforced in the most recent guidance on the Housing Delivery Test published in July 2018. Paragraph 12 of this guidance document states that for housing requirements that are less than 5 years old the figure will be:

“... the latest adopted housing requirement, including any unmet need from neighbouring authorities which forms part of that adopted requirement”

Therefore, to consider the needs of Oxford as separate to their own needs is not consistent with national policy. In order to be considered sound CBC should include the needs of Oxford within its own requirement. Not only would this be consistent with national policy it would also be consistent with the approach taken to Oxford's housing needs elsewhere in the HMA. West Oxfordshire recently adopted Local Plan identifies in policy H2 that delivery and supply will be assessed against the combined figure of its own needs plus the unmet needs of Oxford.

We also object to the proposed staged housing requirement. It is important that the homes required to meet the needs of the HMA are delivered from the point at which this plan is adopted in order to ensure the growing backlog of delivery arising from Oxford is addressed. As such the unmet needs arising in Oxford should be included

within CDC's housing requirement from the point at which this plan is adopted and not delayed a further two years. A staged requirement that puts back the delivery of any backlog until later in the plan period cannot be considered sound as it would be inconsistent with paragraph 03-35 which states that where possible local authorities should address backlog within 5 years.

We would therefore recommend that the wording of the policy is amended by deleting reference to the separate housing requirement for the unmet needs arising from Oxford and the inclusion of a sentence stating that from the adoption of the partial review Local Plan the Council's housing requirement will include the unmet needs of Oxford City Council.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E