

Eugenie Buchan response to Oxford Local Plan Reg 19 Consultation, Dec 2023 – specifically to

REP 1, POLICY H1:

Policy H1 Housing Requirement

Q4. Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.

I support key points about the approach to housing need assessment which Need Not Greed made in its response to this consultation. I supplement, summarise or quote from that response below:

1. **The document is not sound because it does not follow the NPPF (September 2023) guidance in its housing need assessment.** NPPF specifically states that local authority should be *using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.* (NPPF para 63 p. 17).
 - The city council claims that the standard methodology understates the urgent need for housing in the planning period due to the city’s potential for economic growth.
 - This urgent need for housing constitutes exceptional circumstances which justify the use of an alternative method for stating minimal housing need. (see para 2.5 & 2.6)
 - The city council’s aspirations for economic growth do not justify the rejection of the standard method, given that already accounts for economic growth *and* also includes an uplift of 40% to reflect affordability issues. The difference between the standard method and the alternative method gives rise to an additional 560 dpa, amounting to 1,322 dpa. Para 2.5 states ‘... the role of Oxford in the regional and national economy, are particular drivers of housing need.....’.
 - The council’s visionary approach to planning leads to other inconsistencies between policies which have been critiqued by two neighbouring councils, South and Vale. (see summary conclusions of *CAPACITY ASSESSMENT OF OXFORD CITY South Oxfordshire District Council & Vale of White Horse District Council December 2023* pp. 37 – 42)
2. In adopting an alternative approach to calculating housing need **the city council fails to cooperate with neighbouring district councils.**
 - It entered into a HENA study with Cherwell district council which underpins its estimate for housing need but has failed to agree the approach with the other district councils.
 - Rather than representing true exceptional circumstances this statement actually merely reflects the very high economic growth aspirations that the City continues to hold despite the fact that this further stokes housing demand and does nothing to make homes in Oxford City more affordable. Oxford City Council also continues to allocate land to employment and market housing that could be used for council housing. The fundamental issue driving the housing affordability crisis in Oxford is the imbalance in jobs versus available, suitably priced, housing. A more appropriate solution to this problem could be to reduce the number of jobs in the City, not add to them.

3. the Oxford local plan is not effective because it does not overcome the ineffectiveness of the previous plan especially in terms of new infrastructure to support existing targets. Nor has the city made any effort to analyse why the current plan has failed to deliver on targets, and this reinforces the ineffectiveness of the current draft plan.

As Need not Greed pointed out in its response:

- a. *In the current Local Plan there were also very high numbers of housing that were approved which was supposed to address the affordability issue - given the problem persists, that has clearly been ineffective so on that basis this new plan must fail the effectiveness test.*

REP 2, General Statement of Common Ground: inputted under 'other comments' on database

- b. *The statement of common ground does not reflect effective joint working as matters of contention appear to have been deferred - reference page 4 'The City Council has opened discussions with the County Council and adjoining districts about our housing need. The points of acceptance and disagreement vary between each district. A separate Statement of Common Ground or individual Statements will be produced for this matter specifically, setting out clearly the points of agreement and disagreement.'*

REP 3, IDP: - inputted under c.8 on database

- c. *The very significant matter of lack of sewage capacity also appears to have been deferred. Page 36 of the Oct 23 Infrastructure Delivery Plan states 'Thames Water have also confirmed that funding is available for the delivery of a major increase in treatment capacity at the Sandford Wastewater Treatment Works (WWTW). 'Given the current financial difficulties Thames Water find themselves in it would seem appropriate to test this assertion and actually obtain a PLAN with a delivery date. Their stormwater discharge site <https://www.thameswater.co.uk/edm-map>, showing Sandford's ongoing regular discharges of raw sewage into the Thames, states 'We're finalising plans for a major upgrade at Oxford STW, costing more than £130m. This will provide a significant increase in treatment capacity, larger storm tanks and a higher quality of treated effluent going to the river. We can't yet confirm a completion date.'*