

Comment on local plan from Ian Middleton – [REDACTED] Yarnton, [REDACTED]

With reference to policies S1, SPS2, SPS3, S4, H1, H2 and the duty to co-operate

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Policy H1: reasons for unsoundness

1. The Government's standard method calculation sets out the minimum local housing need for every local authority area, unless there are exceptional circumstances that can be demonstrated which justify an alternative approach and a different number.
2. In determining an estimate of housing need the Council has departed from the Standard Method promoted in the NPPF and instead relies on a figure of need inflated by what appears to be an arbitrary uplift applied within the Housing and Economic Needs Assessment (HENA).
3. The HENA has added 30% to the standard method yet ONS population prediction of population growth is only 5%. This is a deliberate over-inflation of the housing need numbers that makes no sense. Then a further houses per annum for Oxford's unmet need is added even though there's no actual data on Oxford's needs other than the same report from the samcoue company.
4. Housing need numbers should be based on the 2014 census numbers not speculating on the 2024 numbers which may be lower.
5. The City Council should not be assuming that growth will continue infinitely especially as this goes against their commitment to tackling climate change by breaching planetary boundaries.
6. The government's Standard Methodology should remain the upper limit of what would be acceptable in terms of housing growth. Even this will place significant strain on our environment, services and infrastructure, and a trajectory based purely on meeting affordable housing need should be considered.

Duty to Cooperate

7. This report is compiled along very similar lines to the Oxfordshire Growth Needs Assessment which was a central platform of the now defunct Oxfordshire 2050 plan (OP2050). The HENA appears to be a reworked report based on much of the same data and arrives at a figure previously encompassed in the scenario that called for the highest level of growth. My understanding is that Oxford City Council's insistent on this growth approach caused the ultimate failure of the OP2050.

8. The City plan, based on the HENA, appears to be trying to facilitate a similar outcome to the OP2050 by assuming a level of co-operation with surrounding districts as was evidenced during the last round of local plans (and in the case of Cherwell a local plan review). That generated a supposed need of 14800 houses that were to be sited outside the City and were instead destined for Geen Belt sites in the surrounding districts.
9. This relied on the 'duty to co-operate' between councils and was co-produced by the Oxfordshire Growth Board which ultimately concocted a total need figures due to lack of evidence at the time from the incomplete City local plan. On that occasion the City Council was also accused of inflating the housing need figures and evidence was provided from a recognised independent consultancy.
10. The Local Plan indicates that Oxford City Council wants and so-called 'unmet need' to be met by additional housing provision within the surrounding Oxfordshire local authorities in an Oxfordshire strategic housing market area.

Policy H1: reason for unsoundness

11. The total supply proposed represents some 36% of the total identified need, with the remainder they say to be considered as unmet housing need. This is not Positively Prepared because Oxford has set a deliberate policy of not meeting its chosen high level of need, the plan then carries forward the concept of having a capacity led approach to the housing requirement, and then it does not met those needs.
12. This policy is clearly not Positively Prepared because it is not informed by any actual agreements from the authorities this impacts upon, with the possible exception of Cherwell. It is merely based on an expectation that other authorities will co-operate. This fails on the Duty to Cooperate as it is not a 'Duty to agree' without any prior discussion.
13. It appears, yet again, that the City Council intends to ignore options for housing developments within its own boundaries and instead is prioritising its own land for economic development, leaving districts to provide for housing that it says it cannot provide itself.
14. There are additional housing opportunities available on sites that are proposed to be safeguarded /brought forward for employment use such as land within the City Council's ownership at Oxpens.
15. This is not a sustainable position given that it generates employment without providing any additional housing for those employees. Moreover it does not address the existing issue of housing need within the city boundaries, but instead makes that need even worse by encouraging economic development over residential. This then generates a further need for commuting into and out of the city which is not

sustainable and is incompatible with the climate change mitigation priorities of all Oxfordshire local authorities.

16. In accordance with the NPPF, the City Council should have undertaken its own local assessment of housing need relevant to Oxford only. Instead, it has sought to recreate the SHMA of 2014 with input only from Cherwell District Council.
17. For these reasons (and some others) I do not feel that the housing need identified by the HENA does not produce a plan that is Positively Prepared, Justified, or Consistent with National Policy as well as failing in the Duty to Cooperate.

Duty to Cooperate

18. As a Cherwell District Councillor and resident of Cherwell this will have a direct impact on me as we once again face a situation where areas around the city will come under pressure to be developed.
19. I understand that an Independent Review of the Oxfordshire Housing and Economic Needs Assessment prepared for Cherwell District and Oxford City Councils by other district councils raises concerns about the fundamental soundness and duty to Cooperate concerns.

Policy H1: reasons for unsoundness

20. The HENA includes an employment scenario, which shows a much lower level of growth than previous projections for Oxfordshire whilst simultaneously predicting a higher level of housing need. It predicts a large drop in economic activity in Oxfordshire at the same time as job numbers are growing strongly. Both cannot be true
21. The HENA employment-led model of housing need adopts a policy-on approach to commuting, and a policy-on approach to apportioning need between the local authority areas. However in reality, the level of housing need generated in Oxford City from the modelling will inevitably be lower than the Government's standard method figure of 784 dpa without the policy on apportioning of need.
22. I agree that the Census figures for Oxfordshire show that our population has grown faster than predicted (not surprising given the Oxfordshire Housing & Growth Deal, by which our local authorities agreed to a level of housing development well above local need). However, population figures are not the same as household projection figures. The Census indicated that household numbers in Oxford actually dropped slightly from 2011.
23. The argument for the increased housing need proposed in the HENA, over and above the standard method is by means of a 'Census adjusted' figure, but this is

unprecedented and not justified. The standard method calculation uses specific algorithms which provide a fixed number for

24. housing need. Only where there is evidence that exceptional circumstances apply in the local authority area should these be changed. No exceptional circumstances have been demonstrated for Oxford City or Cherwell District, or any of the other Oxfordshire local authority areas.

Policy H2: reasons for unsoundness

25. In terms of 'affordable' housing the HENA identifies a net need for 2767 affordable homes per year across Oxfordshire. This figure is unjustifiable. The correct figure is more likely to be in the range 1,000-1,150 affordable homes per year.

Policy H1: reasons for unsoundness

26. Based upon the demographic and employment data for Oxford City and Cherwell (and the rest of Oxfordshire) the HENA does not provide any convincing justification for using an alternative approach to the standard method. Any demographic adjustments to these figures are purely speculative and rely on assumptions about census data that is yet to be published.

27. New standard methodology figures are expected in 2024, when the ONS's household projection figures based on the 2021 Census are due to be published. Further census data still to be published also includes information on commuting, household formation and student numbers. Until then, a highly precautionary approach is required

28. As with the OGNA, and the Strategic Market Housing Assessment before it, the HENA identifies an artificially inflated local housing need for Oxfordshire that forms the basis for the City's preferred figure of 1322 DPA. These figures are primarily driven by economic activity rates which are entirely unrealistic and cannot be substantiated.

29. Removing those unrealistic assumptions brings the figures broadly in line with the standard method (762 dpa) and it is that figure that should be used to inform the Oxford Local Plan and any discussion of unmet need.

30. Setting high growth numbers has an impact on the 5 year land supply which could allow speculative development

Duty to Cooperate

31. It says: "Oxford is the most sustainable location for employment in the county. It is easier to strengthen and develop the public and active transport systems to take people to jobs in the city rather than scatter employment to less sustainable locations."

32. In terms of the duty to co-operate the plan shows poor understanding of the nature of rural communities and retrofitting priorities.
33. To attempt to provide resilience and adaptation to climate change, and to reduce greenhouse gas emissions in accordance with national policy different types of labour-intensive work must be developed. These include tradespeople and builders to retrofit homes with insulation and renewables and fit other energy efficiency measures, organic horticulturalists and workers for regenerative farming and land-workers to restore natural habitats, provide flood-protection through restoration of flood plains and the planting of trees etc. Much of this rural based. Oxford cannot assume that the City is the most sustainable location for employment.
34. The aim to create new areas of employment in the city, unrelated to the extreme needs demanded by earth systems collapse, runs counter to Levelling Up and ignores the resource we need in every place where people live, or where people manage land.

Duty to Cooperate

35. The failure to consult with other rural districts on the distribution of work in the County is a failure of the Duty to Cooperate.
36. The plan also doesn't take into account the proposals for a revised NPPF where the duty to co-operate is to be replaced with an as-yet-unformulated "alignment policy". The duty will remain in place until those provisions come into effect, the document says, and "further consultation on what should constitute the alignment policy will be undertaken".

Policy SPS2: unsound

37. Policy SPS2 makes reference to the possibility of the relocation of the Kassam football Stadium. This is by no means a certainty and should not be speculated on within a local plan. The policy does state that the site should remain as a football stadium and this should be the assumption unless other plans are definitely identified. As it stands at the moment there is no certainty that the stadium will move, although without the intervention of the City Council, Oxford United Football Club may lose the ability to play there. The City Council should be doing everything they can to facilitate the continued occupation of the stadium by the football club that bears their name. It is counter-productive for them to be speculating on likely use of the land as this ends up the wrong message to all parties concerned as well as raising unrealistic expectations about available land.

Ian Middleton