

Planning Policy Team  
Oxford City Council

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5<sup>th</sup> January 2024

Dear Planning Policy Team,

**Re: Oxford 2040 Local Plan Regulation 19 Consultation**

This letter is submitted by Gladman Developments Ltd (Gladman) in response to the Oxford 2040 Local Plan Regulation 19 consultation. It should be read in conjunction with the representations submitted by Stantec on behalf of a consortium of parties, including Gladman, which is appended to this covering letter.

The response includes a preliminary technical analysis of the housing need scenarios prepared by Stantec's Development Economics Team set out in the HENA. It also provides an analysis of the methodology of the HELAA and the resulting conclusions regarding Oxford's capacity to meet its housing need before commenting on how Oxford City has met the requirements of the duty to cooperate, and the importance of collaboration between Oxford City and the neighbouring districts on strategic housing and infrastructure and to meet Oxford's unmet housing needs.

Gladman are supportive of the preparation of a new Local Plan for Oxford City and the delivery of new growth, including new homes, across Oxfordshire. The current Oxford City Local Plan was adopted in 2020, however much of the housing and economic related evidence derives from the 2014 Oxfordshire Strategic Housing Market Area (SHMA) which outlined housing needs of the region and was agreed by the Oxfordshire Growth Board. Indeed, the housing requirements and identification of unmet housing needs up to 2031 within current adopted Local Plans across Oxford City, Cherwell, West Oxfordshire, South Oxfordshire and Vale of White Horse are derived from this evidence base.

In addition, to changes in national planning policy, preparation of the Oxfordshire Plan 2050 and the Arc Spatial Framework have been abandoned. Therefore, it is clear that there is a critical need for a new Local Plan which seeks to address the challenges across the County with clear cooperation with neighbouring authorities given the functional relationship, particularly in relation to economic growth, which exists.



[www.gladman.co.uk](http://www.gladman.co.uk)



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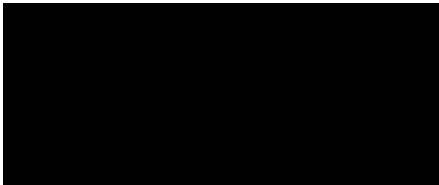
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Gladman support the approach and justifications in the HENA to incorporate economic needs into the calculation of housing needs. It is agreed that there are exceptional circumstances which warrant a departure from the standard method for calculating local housing need but note that Oxfordshire's housing need may be understated within the published HENA. It is considered that a more appropriate housing need figure across Oxfordshire is a minimum of 5,000 dwellings per annum.

This figure provides greater support for employment growth across the county and delivers a significant improvement in the balance between housing supply and demand whilst retaining a modest requirement for 1,000 daily inward commuters in 2040 against the baseline demand. Further commentary is set out in the appended response by Stantec.

Finally, it is acknowledged that engagement with strategic planning bodies and neighbouring authorities has taken place, as outlined in the Statement of Common Ground for Duty to Cooperate document (August 2023). Although there are differing views between parties on how some strategic matters such as housing and economic needs can be addressed, such disagreements does not demonstrate that there has been a failure on Oxford City Council's part, however further work is required to ensure apportionment of Oxford City's unmet housing need is agreed.

Yours faithfully,



Senior Promotion and Policy Planner

 **GLADMAN**

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**Appendix 1:** Oxford City Local Plan 2040 Proposed Submission Draft  
(Regulation 19) Consultation: Representations submitted by Stantec on behalf of, L&Q Estates, Cala Homes, Vistry Group, Peabody, Gladman Developments, Ptarmigan Land and Pye Homes

5<sup>th</sup> January 2024

Our Ref: 333100673/A3/LD/JD/MK/dw

Planning Policy Team  
Oxford City Council  
Oxford Town Hall  
St Aldates  
OXFORD  
OX1 1BX

Dear Sir / Madam

**OXFORD CITY LOCAL PLAN 2040 PROPOSED SUBMISSION DRAFT (REGULATION 19) CONSULTATION: REPRESENTATIONS SUBMITTED ON BEHALF OF L&Q ESTATES, CALA HOMES, VISTRY GROUP, PEABODY, GLADMAN DEVELOPMENTS, PTARMIGAN LAND AND PYE HOMES**

**1. INTRODUCTION AND EXECUTIVE SUMMARY**

We write on behalf of a group of residential developers, promoters and registered providers in response to the Oxford City Local Plan Proposed Submission Draft (Regulation 19) consultation undertaken by Oxford City Council. The group comprises the following members represented by Stantec:

- L&Q Estates
- Cala Homes
- Vistry Group
- Peabody
- Gladman Developments
- Ptarmigan Land
- Pye Homes

Our clients are actively involved in supporting the delivery of new housing and mixed use developments across Oxfordshire. This response specifically relates to the housing requirement identified in the plan which is underpinned by the Housing and Economic Needs Assessment (HENA) published in December 2022 and the Housing and Economic Land Availability Assessment (HELAA) published in September 2023.

Our response includes a preliminary technical analysis of the housing need scenarios prepared by Stantec's Development Economics Team set out in the HENA. It also provides an analysis of the methodology of the HELAA and the resulting conclusions regarding Oxford's capacity to meet its housing need. We would welcome an opportunity to discuss our representation in more detail with Oxford City Council to inform the preparation of its Proposed Submission (Regulation 19) draft Local Plan 2040.

The response also comments on how Oxford City has met the requirements of the duty to cooperate, and the importance of collaboration between Oxford City and the neighbouring districts on strategic housing and infrastructure and to meet Oxford's unmet housing needs.

All spatial matters including the selection of a spatial strategy and sites within Oxford City and across Oxfordshire will be subject to separate representations at this and future stages of consultation.

## 2. STRATEGIC PLANNING CONTEXT

Oxfordshire has a long track record in long-term planning for development and infrastructure being undertaken at a county-wide geography. Notably, the Oxfordshire Structure Plans, then the South East Plan and, more recently, the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 which informed the preparation of the Oxfordshire Housing and Growth Deal (OHGD) 2018 and, alongside updated evidence which informed Oxford City's adopted Local Plan, the current adopted local plans for all local planning authorities (LPAs) in Oxfordshire.

It is commendable that all LPAs in Oxfordshire have an adopted plan (albeit Cherwell, Vale of White Horse (VOWH) and West Oxfordshire (WODC) have Part 1 plans which are now more than five years old). However, this position was only reached as a result of intervention by Inspectors appointed to examine the plans of Cherwell, West Oxfordshire, and Vale of White Horse Councils, and in the case of South Oxfordshire, intervention by the Secretary of State. The adopted plans for the Oxfordshire districts each identify sites to accommodate a proportion of 'unmet' housing need that Oxford City is unable to provide for within its own administrative boundary. This was established through joint working coordinated through the Oxfordshire Growth Board.

Regrettably, during the past 2 years, the Department for Levelling Up, Housing and Communities (DLUHC) has abandoned the preparation of the Arc Spatial Framework and the LPAs in Oxfordshire announced that the Oxfordshire Plan 2050 - a OHGD commitment - was also abandoned<sup>1</sup>. Whilst we acknowledge that this leaves a vacuum in terms of any strategic plan for Oxfordshire, there remains a compelling case in our view for a strategic plan to be produced.

In the short term, absent of such a strategic plan, it is imperative that Oxford City Council's neighbours engage constructively, actively and on an ongoing basis to help shape a shared understanding of housing and employment needs of the area. At present, this must be undertaken under the duty to cooperate (s110 of the Localism Act 2011) but is anticipated to be replaced by the Government's proposed 'alignment test'.

Oxford City Council has led the production of the HENA in collaboration with Cherwell District Council. The HENA followed the preparation of the Oxfordshire Growth Needs Assessment (OGNA) 2021 which was published as part of the Oxfordshire Plan evidence base. Oxford City Council held a 'part 2' regulation 18 consultation specifically on housing need and the HENA from February 2023 - March 2023.

During this consultation, responses were received from the neighbouring local planning authorities as well as Oxfordshire County Council. South Oxfordshire District Council (SODC) and VOWH submitted a joint response which opposed the HENA methodology and the departure from the standard method to calculate housing need<sup>2</sup>. As set out in the Preferred Options Regulation 18 (Part 2) Consultation Report<sup>3</sup>, WODC commented that further justification for departure from the standard method is needed and that further discussions are required to identify the extent and apportionment of any unmet need between neighbouring districts. Cherwell supported the use of the HENA, which it jointly commissioned.

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<sup>1</sup> <https://www.southoxon.gov.uk/uncategorised/joint-statement-from-the-leaders-of-south-oxfordshire-district-council-vale-of-white-horse-district-council-cherwell-district-council-oxford-city-council-and-west-oxfordshire-district-council/>

<sup>2</sup> <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2022/11/South-response-letter-to-Oxford-Local-Plan-FINAL.pdf>

<sup>3</sup> [Preferred Options Regulation 18 \(Part 2\) Consultation Report | Oxford City Council](#)

SODC and VOWH have since published their Joint Local Plan Preferred Options Consultation Document (Regulation 18 Part 2)<sup>4</sup>. It is expected that this document will be subject to consultation from January through to February 2024. The document sets out a housing requirement which is based upon the Government's standard method plus the unmet need from the City which is already committed through the adopted plans for SODC and VOWH. No additional strategic allocations are included in the consultation and there is no provision to meet any future unmet need for Oxford City. On behalf of its clients, Stantec will respond to this consultation in due course.

As explained in section 4 below, our clients support Oxford City Council's decision to plan for a housing need figure that exceeds standard method. The Standard Method calculation is substantially lower than the housing requirements established through the current adopted local plans and which, in our view, would result in significant consequences for housing affordability, meeting housing needs, supporting economic growth and prosperity, and environmental harm including increased commuting.

Unsurprisingly, there is a long history of Oxford City not being able to accommodate its housing need within its own administrative area. Successive local plans have set a housing requirement less than the identified need, principally because of capacity constraint, and this has been justified through local plan examinations. We comment on Oxford City Council's latest evidence base - the HELAA - in more detail below.

In conclusion there is a pressing need for the Oxfordshire authorities to work constructively, to agree an evidence base, plan for and deliver development and infrastructure through new and existing mechanisms of cooperation, to meet needs in full.

### **3. DUTY TO COOPERATE**

As set out above, there has been a longstanding need and structures for the Oxfordshire authorities to co-operate on strategic planning matters.

Section 110 of the Localism Act 2011 sets out the duty to co-operate in relation to planning of sustainable development. Importantly, as set out in paragraph 022 Reference ID: 61-022-20190315 of the Planning Practice Guidance (PPG), this duty does not require agreement between authorities but does require an authority to demonstrate the efforts it has made to co-operate and the outcomes achieved. This involves the preparation of one or multiple statements of common ground which details the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. Paragraph 23 of the updated NPPF (December 2023) continues to require authorities to comply with the duty to cooperate and, in any event, the previous version of the NPPF (September 2023) will apply to the examination of this local plan.

Oxford City Council has prepared two key documents in relation to its duty to co-operate. The Duty to Cooperate Scoping Strategy (June 2021) was subject to consultation with key stakeholders. It summarises Oxford City's responsibilities under the duty to cooperate, identifies the strategic matters which will fall under the duty, identifies the relevant bodies for cooperation and sets out the relevant mechanisms for cooperation.

The General Statement of Common Ground for Duty to Co-operate (GSCG) (August 2023) is referred to as a 'live document' and updates the Scoping Strategy with further details on the strategic matters and how Oxford City Council has engaged with the relevant strategic planning bodies. Section 4 of the GSCG summarises the various mechanisms for cooperation including each of the specific meetings which take place, their frequency, and their purpose.

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<sup>4</sup> <https://democratic.southoxon.gov.uk/ieListDocuments.aspx?CId=121&MId=3188>

It is acknowledged that there are differing views on some of the strategic matters, such as housing and economic needs, between the authorities. Importantly, however, such disagreement as it exists does not demonstrate that there has been a failure on Oxford City Council's part.

In Stantec's view, the GSCG demonstrates that active and ongoing cooperation has taken place. Stantec recommends that a future update is produced prior to submission which includes minutes of the meetings listed in section 4 of the GSCG which would assist with demonstrating that cooperation has been constructive. Such additional information should include an in principle agreement with the other local planning authorities in Oxfordshire to accommodate Oxford City's unmet housing need in full.

In conclusion, whilst we acknowledge that ongoing cooperation between the Oxfordshire authorities to agree an apportionment of Oxford City's unmet housing need is required, Oxford City Council has complied with the requirements of the duty to cooperate.

#### **4. HOUSING AND ECONOMIC NEED**

The HENA objectively assesses the housing need for Oxford and tests 4 scenarios to calculate the need. It was published as part of the housing need consultation (second regulation 18 consultation) alongside the consultation document. The consultation document identifies the Cambridge Economics Baseline Trends forecast as the most appropriate scenario. This gives a need housing need figure for Oxford of 1,322 dwellings per annum. This figure is reflected in the background text to policy H1 (paragraph 2.8) in the consultation document.

The foreword to the regulation 19 consultation document states that "Oxford continues to suffer from a housing crisis". Paragraph 2.1 sets out that there is a limited supply of housing in the city, which exacerbates inequalities by leading to high property prices and a limited supply of affordable housing. This provides a succinct explanation why it is so important to boost housing supply locally.

##### **HENA Scenarios**

The methodologies used to develop the HENA's four scenarios provide a clear basis to establish the scale of local housing need that responds to critical local factors. Specifically, the fact that Oxford is the functional hub of the high performing Oxfordshire functional economic market area (FEMA).

Housing has a critical role to play in enabling Oxfordshire's sustainable economic growth. Generally, new homes should be located near to jobs (the quantity set against plausible forecasts of employment growth over the next twenty years) ensuring that unsustainable commuting is minimised, and sustainable neighbourhoods are created that help to reduce private car use.

Oxfordshire operates as a FEMA and Housing Market Area (HMA). The FEMA / HMA authorities are inextricably linked, they do not operate in isolation, their housing needs are collective and should be addressed as such; in full, within the FEMA / HMA. If not, sustainable economic growth will be compromised and ultimately constrained, increasing the risk that social harm will result. Furthermore, under delivery of much-needed housing will exacerbate existing issues identified in paragraph 1.1 of the consultation document.

In the circumstances outlined above, the HENA scenarios provide a clear indication of the balance between jobs and homes - a critical measure in the context of an economic powerhouse of international significance. Further, the scenarios identify the extent to which growth in the demand for labour will be satisfied by the supply of labour associated with a given level of housing supply. Finally, where shortfalls in labour / housing supply exist, the scenario metrics provide a measure of the extent to which labour originating outside of Oxfordshire is required to satisfy demand originating within Oxfordshire.

Table 4.1 below, which puts the four HENA housing need scenarios side by side in order of increasing size (dwellings per annum) from left to right, illustrates this point. The figures presented have been derived from the HENA (Tables 7.8 (p.85), 7.9 (p. 86), 7.13 (p.94)) or calculated using the assumptions published in the HENA (Tables 7.6 (p77) and 7.7 (p.83)). Apart from the scenario headings (dwelling per annum figures), the numbers are rounded for ease of reference.

**Table 4.1: Key HENA Scenario Metrics**

<b>Housing Need Scenario</b>	<b>Standard Method</b> <b>3,388 dpa</b>	<b>CE Baseline</b> <b>4,406 dpa</b>	<b>2021 Census Adjusted</b> <b>4,721 dpa</b>	<b>Economic Development Led</b> <b>5,830 dpa</b>
A. Dwellings in 2022	310,000			
<b>B. Dwellings in 2040</b>	<b>371,000</b>	<b>389,000</b>	<b>395,000</b>	<b>415,000</b>
C. Net additional dwellings	61,000	79,000	85,000	105,000
<b>D. Population in 2040</b>	<b>876,000</b>	<b>919,000</b>	<b>932,000</b>	<b>979,000</b>
E. Working age in 2040	552,000	579,000	588,000	618,000
<b>F. Working residents in 2040</b>	<b>425,000</b>	<b>446,000</b>	<b>453,000</b>	<b>476,000</b>
G. Workplace workers target (CE Baseline Jobs)	460,000			
<b>H. Daily inward commuting 1</b>	<b>23,000</b>	<b>9,000</b>	<b>5,000</b>	<b>-10,000</b>
I. Workplace workers target (Econ. Development Led Jobs)	490,000			
<b>J. Daily inward commuting 2</b>	<b>42,000</b>	<b>28,000</b>	<b>24,000</b>	<b>9,000</b>

Source: HENA and Stantec analysis

The smaller the daily inward commuting figure is, the more self-contained the FEMA / HMA becomes and therefore the less necessary it is to rely upon labour from outside of Oxfordshire. The effect of which is to reduce unsustainable commuting and improve the balance between housing demand and housing supply.

### Commentary on the Scenarios

In the context of its two employment led scenarios (CE Baseline (4,406 dpa) and Economic Development Led (5,830 dpa)) the HENA sets a target of reducing daily inward commuting to 9,000, noting that the OGNA estimated daily in commuting to be about 1.5 times greater. The HENA rightly observes that this OGNA estimate is a market signal of housing undersupply and should be reduced so that the supply of and demand for housing achieves a better balance.

By reference to the HENA daily commuting 'market signals' shown in rows H and J of Table 1.1, we can immediately conclude that the Standard Method housing need scenario should be ruled out, because the daily inward commuting figures are significantly above 9,000. This means that the existing imbalance between the demand for and supply of homes would not be addressed and could worsen, the risk of unsustainable commuting is high, the availability of so many workers from outside Oxfordshire is unknown and a further risk factor to economic wellbeing.

Assuming the workplace workers target associated with HENA CE baseline employment growth (c460,000 workers in 2040), the remaining three housing need scenarios all pass the HENA daily inward commuting 'test', because they are either set at or are less than 9,000. That said, the Economic Led Housing Need Scenario would produce a notional (and unnecessary) surplus, because that scenario's purpose is to provide for a greater number of workplace workers (c490,000) in 2040.



Thus, we can conclude that the CE Baseline Scenario and 2021 Census Adjusted Housing Need Scenarios are suitable housing need estimates, if the target is c460,000 workplace workers in 2040, with the 2021 Census Scenario (4,721 dpa) preferable, because it delivers the best balance between housing supply and housing demand.

Assuming the workplace workers target associated with HENA Economic Led employment growth (c490,000 workers in 2040), then self-evidently, the Economic Led Housing Need Scenario (5,830 dpa) is the only suitable housing need estimate for Oxfordshire.

In summary, review of the scenarios leads us to conclude that Oxfordshire's housing need is 4,721 dwellings per annum if the workers target is c460,000 in 2040 (the CE baseline employment projection) or 5,830 dwellings per annum if the workers target is c490,000 in 2040 (the Economic Development led employment projection).

### **The Appropriateness of the Selected Scenario**

The conclusion that Oxfordshire's housing need should be aligned to the CE Baseline Housing Need Scenario, a need for 4,406 dwellings per annum, fails to recognise the more beneficial commuting balance achieved by the 2021 Census Adjusted Housing Need Scenario (4,721 dwellings per annum).

Furthermore, the Council's preferred scenario fails to provide enough homes to realise the economic growth ambition articulated by the Economic Development Led employment growth projection (c490,000 workers in 2040). This puts a brake on sustainable economic growth, risks exacerbating unsustainable commuting patterns, tipping the supply of and demand for housing further off balance and thereby worsening Oxfordshire's housing crisis. Oxfordshire's housing need should be capable of facilitating above trend economic growth, the following extract from the HENA explains why:

**“It is important to recognise that in the longer-term Oxfordshire remains one of the most important investment locations in the country and that there can be expected to be continued demand for investment and projects to locate there. In summary, this [Employment Led] scenario is designed to represent an example of a scenario showing the housing and employment impacts of a realistic, growth led scenario. It is based on the economic impacts of a realistic set of known development plans. The scenario is meant to demonstrate the impacts in terms of housing and economic needs - it is not meant to judge whether the specific projects and investments will or will not come forward. Rather it is an assessment of growth needs should economic development plans and projects in Oxfordshire's knowledge and technical sectors come forward to the level indicated by the scenario.” (HENA, page 75, paragraph 7.3.23)**

The HENA goes on to state that macro-economic events and public funding constraints may slow projects down or lead to some not progressing. It adds that there are also potential downside risks to economic growth but goes on to state that it is difficult to speculate about the path of recovery in the UK and global economy over the next 20 years (HENA page 93 paragraph 7.7.16-17 and page 93/4 paragraph 7.7.21).

On the basis of what amounts to uncertainty, the realistic Economic Led employment growth scenario, for one of the most important investment locations in the country is completely abandoned. This is an unnecessarily pessimistic and disproportionate response.

In the circumstances (e.g., some not all investment led projects may not progress), it would be more prudent to arrive at a housing need estimate somewhere between the baseline and the growth position. To that end, for Oxfordshire, at least 5,000 dwellings per annum is recommended, derived by Stantec Development Economics by applying the assumptions used by the HENA.

A minimum of 5,000 dwellings per annum increases Oxfordshire’s self-containment and would support a significant improvement in the balance between housing supply and demand, but nevertheless retains a modest requirement for 1,000 daily inward commuters in 2040 against baseline demand (thus avoiding any notional surplus of working residents or homes).

Furthermore, and crucially, 5,000 dwellings per annum (minimum) provides the scope to support some employment growth in excess of the CE baseline employment projection, without breaching the ‘ceiling’ target of 9,000 daily inward commuters in 2040. Table 4.2 below sets out the key metrics described above and associated with this ‘Stantec Alternative Housing Need Scenario’, alongside the HENA CE Baseline and Economic Development Led scenarios.

**Table 4.2: Stantec Alternative Scenario**

<b>Housing Need Scenario</b>	<b>CE Baseline</b> <b>4,406 dpa</b>	<b>Stantec ALTERNATIVE</b> <b>5,000 dpa</b>	<b>Economic Development Led</b> <b>5,830 dpa</b>
A. Dwellings in 2022	310,000		
<b>B. Dwellings in 2040</b>	<b>389,000</b>	<b>400,000</b>	<b>415,000</b>
C. Net additional dwellings	79,000	90,000	105,000
<b>D. Population in 2040</b>	<b>919,000</b>	<b>944,000</b>	<b>979,000</b>
E. Working age in 2040	579,000	595,000	618,000
<b>F. Working residents in 2040</b>	<b>446,000</b>	<b>459,000</b>	<b>476,000</b>
G. Workplace workers target (CE Baseline Jobs)	460,000		
<b>H. Daily inward commuting 1</b>	<b>9,000</b>	<b>1,000</b>	<b>-10,000</b>
I. Workplace workers target (Econ. Development Led Jobs)	490,000		
<b>J. Daily inward commuting 2</b>	<b>28,000</b>	<b>20,000</b>	<b>9,000</b>

Source: HENA and Stantec analysis

Stantec recommends that 5,000 dwellings per annum should be the minimum housing need figure for Oxfordshire. In terms of apportioning need to individual authorities, the HENA recommends district level distribution based on the distribution of Oxfordshire’s jobs at the end of the plan period. For Oxford City, that means ~30% of Oxfordshire’s minimum housing need<sup>5</sup>, or approximately 1,500 dwellings per annum (+13% approx. above the CE Baseline figure used by Oxford City Council as the assessment of housing need).

### Conclusions on Housing and Economic Need

Overall, Stantec agree that there are exceptional circumstances which justify a departure from the standard method and find that Oxfordshire’s housing need is understated. Our analysis concludes that housing need across Oxfordshire should be at least 5,000 dwellings per annum, equating to ~1,500 dwellings per annum in Oxford City.

<sup>5</sup> Oxfordshire HENA 2022, page 89, table 7.12 and paragraph 7.6.13

## 5. ESTABLISHING A HOUSING REQUIREMENT FOR OXFORD CITY

Following the identification of the housing need figure through the HENA, Oxford City has prepared a HELAA which is dated September 2023 and is published as part of the current regulation 19 consultation. The HELAA identifies that the total housing supply is 9,612 dwellings for the Local Plan period 2020-2040 (including a 10% buffer). This capacity/supply side figure is based on the following evidence which we discuss below.

### The HELAA

The HELAA lists and maps land which is considered to be deliverable during the plan period 2020-2040. The HELAA considers sites with potential for housing (including student accommodation) over 0.25 ha (or capable of delivering 10+ dwellings net gain), and economic uses (Use Class B2 and Use Class E) over 500 square metres. Sites of 1-9 dwellings were considered more appropriately dealt with through a windfall allowance. Sites which are considered to have development potential during the plan period 2020-2040 are given a 'development potential' figure which is the capacity of the site to accommodate development. The HELAA is also informed by the Employment Land Needs Assessment (ELNA) (2022 and 2023) which recommends whether sites are available for release from employment use for other uses.

Oxford City Council has gathered information on sites through an initial Call for Sites consultation in 2021 (and which has been open to submissions on an ongoing basis), desktop sources of sites, sites identified in the ELNA as having potential for additional employment or housing and consultation responses on previous stages of the Local Plan 2040 and the Oxfordshire Plan 2050. Planning applications were also analysed including extant permissions, withdrawn, and refused applications and lapsed permissions. Landowners of private open-air sports facilities (universities and schools) were also contacted to assess whether there was any land surplus to requirements that could be developed.

The search for sites excluded areas in undeveloped Flood Zone 3b, the SAC, SSSIs and Town Greens as development in these areas would be unsuitable. All other brownfield or greenfield sites, including Green Belt, open air sports facilities, green infrastructure corridors, Local Wildlife Sites, and Oxford City Wildlife Sites and Oxford City Wildlife Corridors were included in the search. An updated Green Belt Assessment (2023) has been undertaken, however, no review of Green Belt boundaries is proposed. Overall, the HELAA assesses 479 sites. Stantec considers the approach taken to sieving sites from the HELAA to be robust.

The capacity of sites has been calculated by a combination of taking account of site promoters' capacity assessments of sites where provided, site specific urban design assessments and using a density typology approach. The housing capacity from sites identified as suitable, available and achievable and capable of delivering 10+ net dwellings is 5,870, and a 10% discount has been applied to this figure to account for potential non-delivery of identified sites.

The total housing supply identified for the period 2020-2040 is 9,612 dwellings. This comprises 3 years of completions within the plan period, the identified housing capacity of HELAA sites, minor commitments (2023/24, 24/25, 25/26), and windfall sources.



### Local Plan Policies and Allocations

The consultation document emphasises the importance of seeking to maximise the supply of housing within Oxford City, and identifies ways in which the draft policies and site allocations prioritise residential development over other uses wherever possible. At paragraph 2.9 the consultation document states:

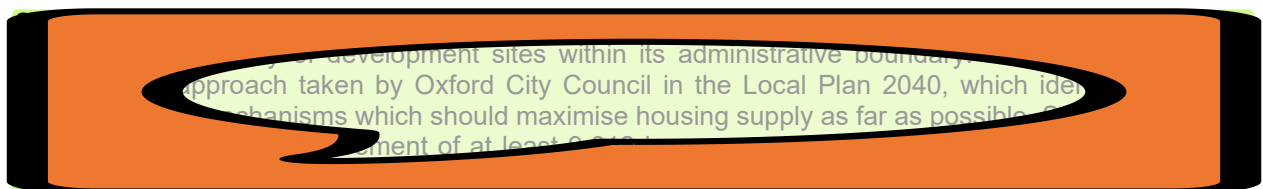
**“Delivery of housing is a priority, and the Local Plan’s strategy is to maximise housing delivery while balancing protection of other important land uses.”**

Draft policy H1 sets out the proposed requirement of 9,612 homes for the plan period (2020-2040). Reflecting the positive approach taken in the HELAA and ELNA, the consultation document includes draft planning policies which also serve to maximise the supply of housing within the City. These include more flexibility on changing existing employment sites to residential uses, the employer-linked housing policy which supports specific major employers in Oxford to deliver affordable housing on their own sites, resisting the loss of existing housing and promoting the efficient use of land at the highest appropriate densities and heights.

The consultation document also includes a significant change in relation to the approach to affordable housing, reducing the on-site affordable housing requirement from 50% to 40% for sites over the threshold. This change is the result of findings of a Viability Study 2023 which explored this issue. This should serve to accelerate the delivery of sites for housing which may have been prevented or delayed in coming forward previously.

Chapter 8 of the consultation document sets out the development site allocations for types of land use and/or whether a site is protected for certain uses. In terms of housing, the estimated capacity of sites is expressed as a minimum, giving developers flexibility to over-provide housing where this would be consistent with other policies in the plan.

### **Conclusions on Oxford City’s Housing Requirement**



## **6. ACCOMMODATING OXFORD CITY’S UNMET NEED**

The evidence prepared by Oxford City Council, primarily the HENA and HELAA, indicates that there will be an unmet need of 16,828 dwellings over the plan period 2020-2040. For the reasons set out below, Stantec finds that the actual unmet housing need figure is significantly higher.

Firstly, the unmet housing need established through the Oxfordshire SHMA 2014 and agreed through the Oxfordshire Growth Board and adopted local plans relates to housing need between 2011 and 2031. Furthermore, the Cherwell, West Oxfordshire and VoWH plans run to 2031. In the case of South Oxfordshire, despite its plan period extending to 31 March 2035, it does not include additional unmet housing need beyond that agreed through the OGB to 2031.

Therefore, we consider there to be a compelling case that 9 years of unmet housing need should be identified through the Oxford City Local Plan 2040 and accommodated within the districts. This is in addition to the 14,300 homes already planned for through adopted plans 2011-2031 (715 dpa).

Taking account of Stantec’s analysis of the Oxfordshire HENA, our support for Oxford City Council’s proposed housing requirement, and our findings relating to unmet housing need, we consider the unmet housing need to be significantly higher than that identified by Oxford City, as summarised in Table 6.1 below.

**Table 6.1: Stantec Alternative Unmet Need Scenario (Residual 2031-2040)**

<b>Stantec Assessment of Oxfordshire's Additional Unmet Housing Need 2020-2040</b>	<b>Dwellings</b>	<b>Dwelling Per Annum</b>
<b>Stantec Alternative HENA Scenario for Oxford City</b>	30,000	1,500
<b>Oxford City Housing Requirement</b>	9,612	481
<b>Oxford City's Unmet Housing Need</b>	20,380	1,019

Using Stantec's Alternative Unmet Need Scenario presented in Table 6.1 above, we conclude that an additional 1,019 homes per annum of unmet need should be included for the period 2031-2040 through future plan reviews (+9,171 homes).

This unmet need figure is increased further if Stantec's Alternative Unmet Need Scenario is extrapolated from the start of the plan period (2020) using our higher annualised unmet housing need, as set out in Table 6.2 below.

**Table 6.2: Stantec Alternative Unmet Need Scenario (2020-2040)**

<b>Stantec Assessment of Oxfordshire's Additional Unmet Housing Need 2020-2040</b>	<b>Dwellings</b>	<b>Dwelling Per Annum</b>
<b>Oxford City's Unmet Housing Need</b>	20,380	1,019
<b>Unmet Housing Need Already Allocated Through Adopted Local Plans (2011-2031)</b>	14,300	715
<b>Oxford City's Unmet Housing Need (2020-2031)</b>	3,344	304
<b>Oxford City's Unmet Housing Need (2031-2040) (see Table 6.1 above)</b>	9,171	1,019
<b>Total Oxford City's Unmet Housing Need (2020-2040)</b>	12,515	n/a

As set out in Table 6.2 above, Stantec finds that the unmet housing need arising from Oxford City for the period 2020-2040 is approximately 12,515 homes, in addition to that already secured through adopted local plans.

It is imperative for the Oxfordshire districts and the City Council to work collaboratively to apportion and plan to accommodate the unmet housing need for Oxford City in addition to their own housing need. As described in section 2 of these representations, there are structures in plan which provide for active and ongoing cooperation. These structures should be used to secure active, ongoing and constructive engagement, similar to that achieved in 2016 through the Oxfordshire Growth Board, to plan to meet Oxfordshire's housing and economic needs in full.

We trust that these representations are useful to Oxford City Council in preparing to submit its Local Plan 2040 in early 2024. On behalf of our clients, we broadly support Oxford City Council's evidence base, including the HENA and HELAA. As explained above, Stantec has presented alternative assessments of housing need, largely based on the HENA, and have provided an alternative calculation of unmet housing need which should be accommodated elsewhere in Oxfordshire. We conclude that the consultation document complies with the legal requirements and can be found sound subject to modifications. We look forward to participating in the relevant examination hearings.

Please contact me by emailing [REDACTED] should you have any queries or wish to discuss these representations in more detail.

Yours faithfully

[REDACTED]

**MICHAEL KNOTT**  
**Planning Director**  
**STANTEC UK LIMITED**

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