



*History of the
development of
housing needs
evidence in
Oxfordshire*

**Oxford Local Plan
2040**

**BACKGROUND
PAPER 17**

Contents Page

| | |
|---|-----------|
| Introduction | 1 |
| Pre-2018: Oxfordshire SHMA 2014 and Oxford SHMA roll-forward | 1 |
| 2014-2018: Post-SHMA joint working and the Housing and Growth Deal | 4 |
| 2018-early 2019: early work on the Oxfordshire Plan 2050, Regulation 18 Part 1 | 5 |
| 2019-2021: Oxfordshire Plan Regulation 18 Part 2 and the OGNA | 5 |
| 2021-2022: OGNA update and the end of the Oxfordshire Plan | 8 |
| 2022-present: Post-Oxfordshire Plan and HENA | 9 |
| Appendix 1: Summary timeline of meetings and publications | 17 |
| Appendix 2: City Council’s August 2023 note on its housing number calculations | 24 |

BGP.17 - History of the development of housing needs evidence in Oxfordshire

1. Introduction

1.1 This paper provides an outline of the development of housing needs evidence in Oxfordshire. It outlines the mechanisms used, assessments published, decisions taken and links to development plans. This is set out broadly chronologically and provides a record of the evolution of the evidence base.¹ Background Paper 16 (BGP.16: History of joint working in Oxfordshire) provides more specific details on joint working and governance arrangements between Oxfordshire's authorities. Appendix 1 provides a summary timeline of meetings and publications related to the development of the housing needs evidence.

2. Pre-2018: Oxfordshire SHMA 2014 and Oxford SHMA roll-forward

2.1 In April 2014 the Oxfordshire Strategic Housing Market Assessment (SHMA) was published. This was the culmination of a joint project commissioned by West Oxfordshire District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and Cherwell District Council. A consultancy team of GL Hearn, Justin Gardner Consulting and SQW produced the SHMA under the oversight of the Oxfordshire Spatial Planning and Infrastructure Partnership (which became the Oxfordshire Growth Board in 2014 and then the Future Oxfordshire Partnership in 2021).

2.2 The SHMA found that the county remained the most appropriate geography for analysis of housing markets in terms of 'best fit' of local authority boundaries to a functional housing market area. The SHMA worked through a demographic analysis and considered past housing delivery, overlaid the economic performance and took account of market signals and affordable housing needs. It identified three scenarios that informed the final Objectively Assessed Need, these were a demographic scenario, economic scenario and an affordable housing needs scenario.

2.3 The SHMA concluded that there was an identified need for provision of between 4,678 – 5,328 homes a year for the period 2011-31. This was a level of housing quite different from that delivered in the past, reflecting that housing provision had not previously kept pace with that needed. Taking a mid-point of this range over the period 2011-31, the headline conclusion was a SHMA identified housing need for Oxfordshire to be 100,060 homes.

Table 1: SHMA outputs:

| SHMA outputs per annum | Range: housing need per annum | Mid-point of Range per annum | Total need over SHMA period (2011-31) |
|-------------------------------|--------------------------------------|-------------------------------------|--|
| Cherwell | 1090-1190 | 1140 | |
| Oxford | 1200-1600 | 1400 | |
| South Oxfordshire | 725-825 | 775 | |
| Vale of White Horse | 1028 | 1028 | |
| West Oxfordshire | 635-685 | 660 | |
| Total Oxfordshire | 4678-5328 | 5003 | |

¹ Where minutes are quoted, officer names are replaced by the council name

2.4 The SHMA was the primary evidence on housing need informing that round of Local Plans. At the time, the five different district councils were all at slightly different stages of plan preparation, resulting in different plan periods, albeit within one housing market area.

2.5 Given the timing of the Oxford Local Plan, the City Council had decided that it would have an end date of 2036, due to the NPPF requirement for a Local Plan to make provision for housing supply for a period of 15 years post adoption. This meant that the SHMA evidence alone did not cover the entire plan period. Oxford City Council therefore commissioned an addendum-style report to supplement the 2014 SHMA, to roll-forward to 2036 Oxford’s housing need calculation. This was published in 2018. It did not replace the 2014 SHMA, it was not commissioned jointly, and only looked at Oxford City to cover the Oxford Local Plan period to 2036. The SHMA roll-forward used the same methodology as the previous SHMA, but used the most up-to-date household forecasts and recalculated the implications of economic growth and affordable housing need. This found that the housing target was similar to that identified in the Oxfordshire SHMA: that Oxford had a housing need of 1,356 dwellings per annum 2016 to 2036 and that a housing requirement of 1,400 dwellings per annum was justified by the evidence. Oxford’s Local Plan 2036 was examined on this basis, was found sound and adopted in June 2020.

3. 2014-2018: Post-SHMA joint working and the Housing and Growth Deal

3.1 Following the production of the SHMA, a programme of joint work was agreed between the Oxfordshire partners. In November 2014 an Oxfordshire Growth Board meeting agreed a programme of work to address the unmet housing need for Oxford City arising from the SHMA. (See BGP.16 for more details)

3.2 By November 2015 a working assumption of 15,000 unmet need homes for the period 2011-2031 was agreed, this was discussed at the Oxfordshire Growth Board meeting on 19.11.2015. On 26 September 2016 the Oxfordshire Growth Board decided on an apportionment of 14,850 for consideration in the preparation of Oxfordshire authorities Local Plans. This apportionment was followed by a signed Memorandum of Co-operation in November 2016. The Memorandum of Co-operation was signed by all other Oxfordshire authorities with the exception of South Oxfordshire District Council. Although not signed by South Oxfordshire District Council, South’s officers played an active part in the Growth Board work programme, contributed to the preparation of all evidence documents and the figure in the Memorandum was subsequently reflected in the South Oxfordshire Local Plan 2034. The Memorandum apportioned the 14,850 homes of unmet need as follows:

Table 2: Memorandum working assumption of apportionment of Oxford’s unmet need

| District | Apportionment (2011-2031) |
|---------------------|----------------------------------|
| Cherwell | 4400 |
| Oxford | 550 |
| South Oxfordshire | 4950 |
| Vale of White Horse | 2200 |
| West Oxfordshire | 2750 |
| Total | 14,850 |

3.3 In the budget statement of November 2017 the Government announced a Housing and Growth Deal for Oxfordshire. When agreed, this secured £215million of government investment over 5 years for new homes and infrastructure in Oxfordshire. The Growth Deal was signed by Cherwell District Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District

Council, Vale of White Horse District Council and West Oxfordshire District Council and Oxfordshire Local Enterprise Partnership and the Secretary of State for Communities and Local Government. As part of the deal Oxfordshire agreed to plan for 100,000 new homes by 2031. (See BGP.16 for more details.)

4. 2018-early 2019: early work on the Oxfordshire Plan 2050, Regulation 18 Part 1

4.1 Work on the Oxfordshire Plan 2050 began in 2018 (see BGP.16 for more details). Public consultation was held on the Oxfordshire Plan Regulation 18 Part 1 document in February and March 2019. The Regulation 18 Part 1 document identified *“Aspiration 4: Improve housing availability and affordability”*. It stated that: *“The implication of this aspiration is that the Plan makes provision for the delivery of additional housing beyond the 100,000 provided in current and emerging Local Plans. Even without the Oxfordshire Plan, additional housing will need to be provided in the period up to 2050 and national policy is that plans need to make provision for the housing needs of their area.”* (page 13).

4.2 Topic Paper 4 on Housing was published as part of the consultation material; it states: *“The adopted Oxfordshire Plan will ultimately identify a housing requirement for the whole of Oxfordshire and apportion it to each of the five district authorities as set out in the Statement of Common Ground. As District level Local Plans are reviewed in the future, the Oxfordshire Plan will form the strategic planning overview which Local Plans will need to be in broad conformity with. The precise level of detail that this information will be presented in will be determined through the production of the plan.”* (paragraph 10).

5. 2019-2021: Oxfordshire Plan Regulation 18 Part 2 and the OGNA

5.1 During Autumn 2019 an officer steering group drawn from across the partner councils was brought together to drive the housing evidence and together with the Oxfordshire Plan 2050 team drafted a brief for the piece of evidence that would inform the housing policies of the Oxfordshire Plan. This piece of work became known as the Oxfordshire Growth Needs Assessment (OGNA). Work was careful and collaborative due to the importance of this commission to all parties and due to the understanding that it would underpin not just the Oxfordshire Plan, but also the tranche of Local Plans to follow.

5.2 By the end of 2019 a brief for the OGNA had been published and advertised on the South East Business Portal on behalf of all the districts. The brief was later published on the Oxfordshire Plan website in response to requests from the public. The brief states: *“The aim of this study is to identify numerical scenarios for sustainable housing and economic growth needs in Oxfordshire over the period 2020-2050 based on consideration of key drivers including the housing market, demography and the economy. Taken together, the scenarios will provide a tool that policy-makers can use when developing policies for the Oxfordshire Plan.”* (paragraph 13)

5.3 As a result of this tendering process, the Oxfordshire councils (through Oxford City Council) commissioned Cambridge Econometrics with their partners Icen Projects and J G Consulting to prepare the OGNA. As that work progressed, to ensure it effectively addressed the core objectives of the brief, the assessment was divided into three complementary reports, broadly corresponding to three phases of work, starting with:

- The Phase 1 Report, which addresses housing need, economic growth and employment land requirements for Oxfordshire, and appraises the high-level commuting and affordability implications;
- Following on from this, The Phase 2 Report defines and characterises the Oxfordshire Functional Economic Market Area, which is used to develop and test scenarios for the distribution of Phase 1 housing need and employment growth within Oxfordshire;
- Finally, to reflect the emergence of the Covid-19 pandemic during the development of the OGNA, a Covid-19 Impacts Addendum was produced to sense-check, contextualise, and update the results of the Phase 1 and Phase 2 Reports in light of these developments.

5.4 As work on the OGNA commission started to produce emerging findings, and as the commission came towards a close, significant work was put in to ensuring that all levels within each partner authority were fully briefed and understood the approach. This was essential in order that each party could be in a position to sign off the OGNA for publication and that its findings could be presented and applied in the Oxfordshire Plan Regulation 18 Part 2 document. The embedded officer steering group continued to meet regularly with the consultants and feedback through the governance arrangements for the project, keeping the Heads of Planning informed and at appropriate points, the Executive Officer Group (EOG), Chief Executives, Leaders and Oxfordshire Plan Member Advisory Sub-Group (see BGP.16 for more details on the Oxfordshire Plan governance arrangements).

5.5 In brief, the OGNA modelled three scenarios for testing as potential levels of growth:

- The low growth, standard method scenario was based on the standard method for calculating homes (albeit very slightly adjusted to account for local demographic factors) and a calculation of the number of jobs expected to support those homes
- The middle, business as usual scenario represented a continuation of Oxfordshire’s recent (pre-Covid) economic performance, and a calculation of the homes needed to support that level of economic growth
- The upper growth, transformational scenario was based on the Local Industrial Strategy’s aspirational “go for growth” jobs scenario, and a calculation of the homes needed to support that level of economic growth

5.6 These scenarios were considered to cover the range of options available: the lower growth scenario being the lowest level permitted under the NPPF (as then in place); the upper scenario being a reasonable upper bookend based on the approved Local Industrial Strategy and one middle, trend-based scenario.

Table 3: OGNA outputs

| OGNA Scenarios | Total homes needed in Oxfordshire to 2050 | Dwellings per annum | Additional jobs in Oxfordshire to 2050 |
|--------------------------|--|----------------------------|---|
| Standard Method Adjusted | 101,580 | 3,386 | 85,400 |
| Business as Usual | 123,390 | 4,113 | 122,451 |
| Transformational | 152,790 | 5,093 | 171,200 |

5.7 The lower level of housing tested in the OGNA would represent a slowing down of housing delivery compared to the previous decade (as a comparison the Growth Deal was a commitment to delivering 5,000 per annum). The OGNA states: “...*planning for higher levels of housing provision than the standard method provides greater potential, both to support economic growth and deliver affordable housing; and a greater likelihood of improving the affordability of market housing over the plan period to 2050.*”

5.8 On June 3rd 2020, a presentation of the emerging OGNA was made by the consultants to a joint meeting of the Heads of Planning and EOG. That meeting also considered a two-step process for sharing the information with the elected members of the districts and county. The July Heads of Planning minutes confirm that step-one: circulation of a recorded presentation with narration explaining the commission (but not the outputs) had been shared. By September 2020 plans were discussed as Liaison Group for step-two: sharing of the OGNA findings with the Oxfordshire Plan Member Advisory Sub-Group (part of the FOP governance arrangements).

5.9 The OGNA Stage 1 findings (the tested scenarios for level of growth) were shared at the 15th October 2020 Member Advisory Sub-Group. The minutes of that meeting show that the presentation included among other items: *“An explanation of HM Government’s ‘Standard Method’ of calculating minimum housing need • Wider policy considerations • Economic trajectories and assumptions in modelling • A range of indicative needs trajectories for Oxfordshire • Next steps”*. At the following meeting of the Member Advisory Sub-Group on 19th November 2020 there was an agenda item for: *“Reflecting on the Stage 1 OGNA findings”* and also: *“Presentation on Stage 2 OGNA findings”*.

5.10 Having shared and discussed the OGNA findings with members of the Member Advisory Sub-Group, the next step was to brief the wider members of the constituent authorities. Member briefings took place in June 2021 ahead of Cabinet decisions on the Oxfordshire Plan Regulation 18 Part 2 document as had been agreed by Heads of Planning on 3rd June 2020. All partners in the project (having been embedded in the work throughout) agreed to sign off the final version of the OGNA for publication, and also for its findings to be presented and interpreted in the Oxfordshire Plan Regulation 18 Part 2 document.

5.11 In July of 2021 the draft Oxfordshire Plan Regulation 18 Part 2 document went to each Local Planning Authority’s Scrutiny Committee and Cabinet/Executive for consideration and approval for public consultation. The common report for all those Cabinet decisions included a section explaining the OGNA and stated: *“We have undertaken an assessment of the growth needs of Oxfordshire up to 2050, the Oxfordshire Growth Needs Assessment (OGNA), which will be published alongside the Regulation 18 part 2 consultation document given its important role as an evidence document. It sets out three scenarios for housing need...The decision on which level of growth will be taken around Christmas 2021 to inform the Regulation 19 stage draft plan.”*

5.12 The period of consultation ran from 30th July until 8th October 2021 on the Oxfordshire Plan website and also on the Oxfordshire Open Thought website with links from all partner authority websites. All phases of the OGNA work were published as one combined document and published in full as part of the supporting evidence. The consultation process was a significant exercise with email notifications to 1,700 registered parties, a social media campaign, online events and webinars, a focus group and press releases to 33 media outlets. Elected members of each district and the county were part of this campaign with several of the Leaders and Chief Executives appearing on the panel at events and giving interviews in the media.

5.13 As expected the housing need evidence drew a large number of comments during the public consultation. The Consultation Statement for the Regulation 18 Part 2 stage notes that this option: *“Policy Option 28 – Homes: How Many? Commitments and Locations”*, was the single issue with the largest number of comments with a total of 326 comments received. The consultation did not propose a single policy approach deriving from the OGNA, instead it presented the three scenarios and asked people’s views on them.

5.14 Views were mixed, in contrast to some of the narrative which has developed subsequently, it was not the case that the majority of respondents criticised the OGNA, or the approach to assessing housing need. There was actually real variation in the responses received and indeed a large movement towards supporting the highest of the tested scenarios. The key messages (and headline statistics) from the consultation were stated in the Consultation Report (at page 84) as follows:

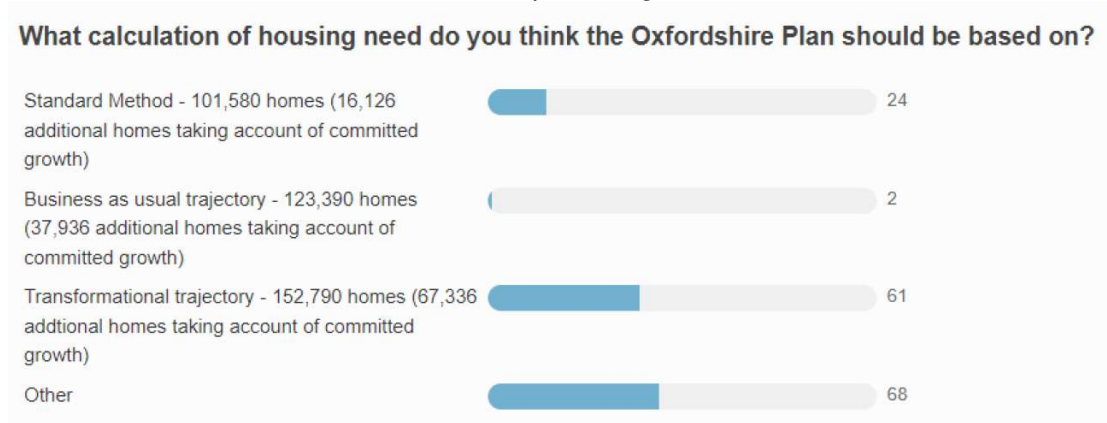
“Key Messages:

There were a wide range of views expressed in relation to the number of new homes that should be delivered in Oxfordshire to 2050.

“Regarding the three housing need scenarios, opinion largely varied. Some respondents considered that the transformational figure should be selected, as they believe it is required to provide new homes, encourage economic growth and reduce commuting. However, several others considered that the standard method figure should be selected, stating that it best matches with climate change objectives, and that higher housing growth could cause significant environmental damage. Other scenarios were also suggested, including an option proposed that would let Oxfordshire grow organically, based on up to date natural population growth figures produced by the Office for National Statistics, with the focus on making housing in the area more affordable.

“There were also many comments received that related to the Oxfordshire Growth Needs Assessment (OGNA). A number of comments received questioned a number of the assumptions used in the OGNA, with some respondents considering that its findings require review.”

Table 4: Extract of headlines from Consultation Report on Regulation 18 Part 2



5.15 As with every document related to the Oxfordshire Plan, the Consultation Statement was drafted by the core team but reviewed and signed off by all the partner authorities. The Statement itself went to each authority’s Scrutiny Committee in February 2022 and onto their Cabinet/Executives in March 2022.

6. 2021-2022: OGNA update and the end of the Oxfordshire Plan

6.1 After the publication of the OGNA and Oxfordshire Plan Regulation 18 Part 2 document in Autumn 2021, work progressed onto the next stage of work. By this point, the partners were clear that the decision on level of growth was needed promptly in order for the Oxfordshire Plan project to progress, as was expressed in the Cabinet Report quoted above at paragraph 5.11. In February 2022, members of OPPO agreed to meet regularly to discuss the housing evidence, next steps, and met with the OGNA consultant team (7.2.22) to discuss what work (including any updates) was needed. By March 2022 a new brief for an update to the OGNA including a review of those comments received through the Reg18 Part 2 consultation was being drafted, informed by legal advice on the OGNA approach.

6.2 In April 2022 a proposed six-step process to secure consensus on Oxfordshire Plan housing questions was being discussed at senior levels across the partnership, including at a Chief Executives meeting. A key step on that process was to update the OGNA. On this basis an approach to the update the OGNA work was agreed with the consultants in May 2022; this was a collective piece of work commissioned with the agreement of all parties. From that point, the OPPO meetings increased in frequency to become weekly meetings as the intensity of the work increased particularly to help steer the OGNA update. A facilitated OPPO and HoP workshop took place in mid-June to co-design and agree the framework to present housing need and requirement options to elected members.

6.3 A series of senior level workshops were held as findings began to emerge from the OGNA update. These workshops comprising Chief Executives, Leaders and Cabinet Members discussed the evidence base and next steps. At a workshop on 14th July 2022 this senior grouping received a presentation from the OGNA update consultants.

6.4 However, by the following workshop held in August, the working relationship between the parties had broken down and the partnership arrangements to deliver the Oxfordshire Plan came to an end. A joint statement was released by the leaders of South Oxfordshire District Council, Vale of White Horse District Council, Cherwell District Council, Oxford City Council, and West Oxfordshire District Council, on 3rd August 2022:

“The five Local Planning authorities in Oxfordshire have been working together on a joint plan for Oxfordshire to 2050. It is with regret that we were unable to reach agreement on the approach to planning for future housing needs within the framework of the Oxfordshire Plan.

“Local Plans for the City and Districts will now provide the framework for the long term planning of Oxfordshire. The Oxfordshire Plan 2050 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing needs will now be addressed through individual Local Plans for each of the City and Districts. The Councils will cooperate with each other and with other key bodies as they prepare their Local Plans.”

7. 2022-present: Post-Oxfordshire Plan and HENA

7.1 With the fall of the Oxfordshire Plan in August 2022, the participating authorities each had a choice to make about the progress of their own Local Plans. Throughout the Oxfordshire Plan project there had been an intention that it would set the overall strategy and level of growth and that a suite of new Local Plans would implement that in terms of site allocations and detailed policies to aligned plan periods.

7.2 By this time, Oxford City Council had already prepared a Preferred Options Regulation 18 document for the Local Plan 2040 and was securing approvals for its publication. However, that Regulation 18 document did not include any options on housing or employment need as those strategic policies had been due to be delivered through the Oxfordshire Plan process. Oxford decided to progress with the planned Local Plan consultation as the loss of the Oxfordshire Plan meant that progress with the Local Plan was then even more urgent. The decision was to progress that consultation and later supplement it with a further consultation when additional housing needs assessment work was available. The Cabinet report seeking approval for the Local Plan Regulation 18 document stated:

“It was also anticipated that the Oxfordshire Plan’s evidence base would form part of that required for the Local Plan. However, the Oxfordshire Plan is no longer being progressed. As such the Local Plan will need additional evidence on issues which would previously been covered by the Oxfordshire

Plan. For example, an Oxfordshire-wide assessment of housing needs had been an integral part of the Oxfordshire Plan work, this assessment will not now progress. Therefore, a detailed assessment of the specific housing needs for Oxford will be commissioned to support the Local Plan; ideally working with as many of our neighbouring districts as possible. This evidence base and any implications for the housing needs options for the City, will form part of an additional consultation in 2023". (Report to Cabinet 14.9.22 and Scrutiny 6.9.22)

7.3 Also in the Summer of 2022, Cherwell District Council were in a similar position to Oxford; they were preparing to consult on a Local Plan Regulation 18 document, in the form of a Draft Plan.

7.4 At the 12th August 2022 Heads of Planning meeting, the City Council informed the other parties that the intention was to move at pace, that there was a need to fill the evidence base gap with regards to housing needs, and that the City Council would be happy to work with whichever partners would like to work together on that. Cherwell were similarly keen to progress this work. Later in August, Cherwell and Oxford were progressing conversations with the consultants who had worked on the OGNA about a new commission with the two authorities as commissioners. Oxford and Cherwell had been content with the (by then aborted) OGNA update work and a good deal of work had already been carried out. As both parties were keen to progress a new commission, it was decided to do so with a new brief largely based on the same approach and methodology of the OGNA but with the detailed elements such as specialist housing needs only being delivered for the two commissioning authorities. This new commission would become known as the Housing and Economic Needs Assessment (HENA).

7.5 In brief, the HENA modelled four scenarios for testing as potential levels of growth, aligned to those used in the OGNA, albeit updated:

There were two housing-led scenarios (using housing level to derive the number of jobs supported):

- The 2014-based Standard Method Scenario, based on the standard method for calculating homes and a calculation of the number of jobs expected to support those homes; and:
- A Census Adjusted Scenario, adjusted to account for release of the 2021 Census, and a calculation of the number of jobs expected to support those homes.

There were also two economic-led scenarios (using jobs level to derive the number of homes needed):

- A Cambridge Econometric Baseline Trend Scenario, based on a 2022 update to CE’s projection of economic growth for Oxfordshire, and a calculation of the homes needed to support that level of economic growth; and:
- An Economic Development Led Scenario, based on the level of growth included in the 2020 Local Investment Plan (Oxfordshire Local Enterprise Partnership’s most recent work supporting the Local Industrial Strategy), and a calculation of the homes needed to support that level of economic growth.

7.6 The table below sets out the dwellings needed per annum in Oxfordshire for each of the HENA scenarios. For comparison purposes only, the previous OGNA scenarios are also identified:

Table 5: HENA Scenario Outputs (with OGNA Scenario Outputs)

| HENA Scenarios | Dwellings per annum Oxfordshire | Dwellings per annum Oxfordshire | OGNA Scenarios |
|-------------------|---------------------------------|---------------------------------|--------------------------|
| Standard Method | 3,388 | 3,386 | Standard Method Adjusted |
| Census Adjusted | 4,721 | - | - |
| CE Baseline Trend | 4,406 | 4,113 | Business as Usual |

| | | | |
|--------------------------|-------|-------|------------------|
| Economic Development-Led | 5,830 | 5,093 | Transformational |
|--------------------------|-------|-------|------------------|

7.7 Throughout this period all Oxfordshire authorities continued to meet monthly through Heads of Planning and regularly (varying between weekly and bi-monthly) through OPPO. A standing item at each of these meetings is for each party to provide an update on Local Plan progress. At the Heads of Planning meeting on 9th September 2022 Cherwell and Oxford explained to the other districts that they had jointly commissioned the HENA, largely based on the OGNA and using the same consultants.

7.8 At the OPPO meeting on 12th January 2023, “Housing Evidence” was a named item on the agenda. The City Council asked when and how the other authorities would want to have a more detailed discussion on the HENA. The City Council were keen to understand whether this would be preferred ahead of the City’s consultation or as part of it and whether it would be with other district’s own housing needs consultants. South and Vale responded that it would be preferable to have that discussion when their own housing needs consultant was on board and that that was likely to be during the consultation period.

7.19 At their meeting on 11th January 2023, Cherwell’s Scrutiny Committee considered their proposed Regulation 18 (Draft) Local Plan. The report appended their proposed Regulation 18 document and the HENA in full. The covering report set out at paragraph 3.37: *“The HENA concludes that the 2021 Census Adjusted and Economic Baseline Scenarios are justified assessments of need. For the purposes of LP40, it is recommended that the Economic Baseline Scenario is identified as representing housing need for Cherwell for the plan period up to 2040. This means a need for Cherwell of 1,009 homes per annum or 20,180 homes in total (2020-2040).”* And the proposed consultation document stated at paragraphs 4.17 and 4.22 (as amended by an addendum note): *“4.17 Overall, the Plan provides for 5,667 homes for Oxford’s needs including the 4,400 homes that are already planned...”* and: *“4.22 Cherwell has already made provision for 4,400 homes for Oxford, through its Local Plan Partial Review, adopted in 2020, and these allocations are saved through this Local Plan 2040. Our Local Plan Review, through the identified allocations, also makes provision for ‘at least’ 1,267 homes elsewhere in Cherwell (i.e., giving a total of 5,667 as set out above), that are accessible to Oxford, including for example at Bicester. Bicester is easily accessible to Oxford by sustainable transport modes. Specific sites and homes will not be identified for Oxford at Bicester, other than for the provision of 633 affordable homes, thus maintaining the commitment to deliver 50% affordable homes provision for Oxford as part of the identified unmet need. The Council will use the same mechanism for allocating affordable homes for Oxford City as for the saved Partial Review Plan allocations.”*

7.10 At their meeting on 19th January 2023, Cherwell’s Executive decided to defer consideration of their Local Plan Regulation 18 document until a later date in the light of the comments of the Overview and Scrutiny Committee.

7.11 In February 2023 the City Council launched the Oxford Local Plan 2040 Regulation 18 Part 2 consultation; this was the additional supplementary consultation to pick up the elements not covered in the earlier Regulation 18 consultation but now necessary because of the fall of the Oxfordshire Plan. The City Council’s Scrutiny Committee considered the document at their meeting on 1st February and on 8th February the City Council’s Cabinet approved it for publication. This public consultation ran between 13th February 2023 and 27th March 2023.

7.12 On 27th March 2023 a bi-lateral meeting was held between the City Council and South and Vale, to discuss the response from South and Vale District Councils to Oxford’s consultation on

housing needs and the HENA. The meeting discussed points raised by South and Vale including points of principle over the approach taken (e.g. the Oxfordshire-wide basis, the continued use of the OGNA methodology, whether the HENA would be revisited following the Regulation 18 Part 2 consultation, and why the City had not yet set out its exceptional circumstances case).

7.13 In June 2023 a series of bi-lateral meetings was held between the City Council and each of the districts primarily to discuss the City Council's Housing and Employment Land Availability Assessment (HELAA); the capacity/supply side of the City's evidence base. An additional conversation was had with Cherwell about progress on the existing unmet needs sites. These meetings were held as follows: South and Vale -26.6.23; West Oxfordshire -28.6.23; Cherwell - 27.6.23. At these meetings the emerging City calculations were shared as follows (extracted from the meeting note):

“Current draft working assumptions (final figures still being refined eg monitoring data for 2022/23 is not yet finalised, and still pending landowner site capacity estimates for some sites):

- *Oxford's need 2020-2040 is 26,440, or 1,322 pa (HENA)*
- *Oxford's capacity is c. 10,736 (537pa) (HELAA)*
- *Resulting in an unmet need for Oxford of c.15,704 (785pa)*

“In the context of:

- *Total of existing unmet need sites from last round of plans 14,300 to 2036*
- *Additional unmet need 2036- 2040: 1,404”*

7.14 At the South and Vale meeting they shared the intention to commission consultants to review both the HENA and the HELAA.

7.15 At the June OPPO meeting the City Council asked the other districts: *“for ideas on how to progress the housing conversation now that some of the previous governance arrangements have ended”* (taken from the minutes). At that meeting there was also a discussion about possibly working towards a joint Statement of Common Ground. There was some disagreement about this as a next step, but the meeting decided to look again at the requirements in the regulations and come back to the issue at the next meeting.

7.16 The 19th July 2023 OPPO meeting was largely devoted to three interlinked issues. Firstly, the minutes record that the City Council, Cherwell and West Oxfordshire favoured the production of a joint Statement of Common Ground, but that South and Vale were not keen on the idea, preferring bi-lateral SoCG. Secondly, the City Council also asked all other parties: *“...how their authority would like to take forward the conversation on Oxford's need and unmet need?”* (taken from the minutes). The meeting agreed that OPPO was a good forum to progress discussions but with senior officers needing to be involved at the appropriate stages. The City Council agreed to circulate a paper on housing numbers to help facilitate this next step. Finally, South and Vale brought their officer who had looked at the HENA in detail into the meeting to present some slides with their queries. The queries included how existing unmet need had been deducted, and how under-provision in previous years has been accounted for.

7.17 On 28th July the Chief Executive of the City Council emailed the Deputy Chief Executive of South and Vale District Councils to explain that the next steps, following publication and comments received on the HENA and the HELAA, were likely to be further discussion between officers at OPPO. Agreement was received by email on the same day.

7.18 On 2nd August Oxford City shared the draft HELAA document with the districts. This included the following table presenting the headline summary of capacity at that stage (and updating the figure from the interim HELAA published as part of the Regulation 18 part 2 consultation).

Table 6: extract of August 2023 HELAA Outputs:

| Summary of capacity 2020-2040: | |
|--|--|
| 3 years completions within the plan period (2020/21, 2021/22, 2022/23) | 1,848 (inclusive of 1,529 majors and 319 minors) |
| HELAA Table B sites (major commitments and draft allocations) | 6,554 (10% buffer not applied) |
| Minor commitments (2023/24, 24/25, 25/26) | 272 |
| Windfall (116 x14 years (2026/27 to 2039/40)) | 1,624 |
| Total capacity 2020-2040 | 10,298 |

7.19 On 11th August the City Council also shared a note on its housing number calculations. The value of a note setting out the City’s calculations on housing need and capacity had been discussed at the July OPPO meeting. The note was shared in the full knowledge that some of the districts intended to challenge the work behind the constituent parts of the City Council’s evidence base but was intended to provide a helpful outline of the City’s work to date. This note (presented in full as Appendix 2 to this paper) set out:

Table 7: Extract of August 2023 note

| | | | | | |
|----|-------------------------|--------------|------------------------------|---------------|---------------------|
| A) | Housing Need (the HENA) | <i>minus</i> | Housing Capacity (the HELAA) | <i>equals</i> | Oxford’s Unmet Need |
|----|-------------------------|--------------|------------------------------|---------------|---------------------|

And then:

| | | | | | |
|----|---------------------|--------------|---|---------------|--|
| B) | Oxford’s Unmet Need | <i>minus</i> | Sites previously allocated in Oxfordshire Districts for Oxford’s unmet need (Current Local Plans) | <i>equals</i> | Additional Unmet Need for Oxford Local Plan 2040 |
|----|---------------------|--------------|---|---------------|--|

7.20 That note concluded that:

“Whilst the overall unmet need for Oxford over the plan period (2020-2040) totals 16,828. 14,300 of those homes have already been allocated in Local Plans, the vast majority of which did not (or will not) deliver before the current plan periods. These allocations could therefore be re-allocated to meet the new unmet need. The additional unmet need beyond this, to cover the whole period to 2040 is 2,528. For comparison, the sites allocated for Oxford’s unmet need in the last round of plans was 14,300 or 715 dwellings per annum. Oxford’s unmet need calculated for the period 2020-2040 is 16,828, or 841 dwellings per annum, which is a difference of 126 dwellings per annum compared to the previous plan period.”

7.21 The note was discussed in detail at the OPPO meeting on 5th September 2023. The City Council had collated all the comments received to date on a single version of the note and circulated it. At the meeting the County Council shared a note and South and Vale shared an annotated copy. South and Vale asked if the City Council had taken legal advice on the points raised in the slides shared at the previous OPPO meeting. The City Council explained that it had sought advice from their barrister and that it remained confident in the approach taken. South and Vale asked to see the advice, the City explained that it was in a verbal con rather than in writing, but that if it would

help it would be secured in writing. South and Vale also stated that there was an issue with lack of co-operation in not sharing the exceptional circumstances.

7.22 In September, Cherwell held their Regulation 18 consultation, publishing the HENA and their proposed approach to its findings. The consultation document had been considered by their Scrutiny Committee on 16th August and approved by their Executive on 4th September. The consultation was held between 2nd September and 3rd November 2023.

7.23 On 13th October the City Council held a workshop with policy officers from all the Oxfordshire districts and the County to discuss the approach taken in the HELAA. That workshop discussed the methodology, the assumptions and the outputs of the HELAA. Throughout the Autumn of 2023 the City Council kept partners up to date on Local Plan progress through OPPO, HoP and Planning Advisory Group (the reframed successor of the Member Advisory Sub-Group) meetings and also through conversations between Chief Executives, Leaders and Cabinet Members. The October OPPO meeting took the form of a workshop starting to draft a joint Statement of Common Ground.

7.24 On 16th October the City Council circulated their legal advice on the points raised by South and Vale as requested at the September OPPO meeting. At the same time the City Council also circulated an extract from an emerging housing background paper setting out the circumstances for departing from the standard method of calculating housing need (the case for exceptional circumstances), also responding to a comment made at the September OPPO meeting. That paper was later published as part of the Regulation 19 consultation in November 2023.

7.25 The minutes of the November OPPO note that since the previous meeting the City had circulated the legal advice on the HENA points raised by South and Vale, they state: *“There was a brief discussion around whether this advice helped address the issues raised by (S&V). (S&V) stated that they would be taking their own legal advice when their barrister was appointed and that there were still planning issues outstanding with regards to S&V concerns on the HENA. (City) recognised this was always likely to be the case. (WODC) commented: if City are happy with the risks related to their work but others have concerns that’ll be dealt with at examination.”*

7.26 In December 2023 a series of bi-lateral meetings were held between the City Council and each of the other districts primarily to cover any queries with the HELAA and HENA work ahead of the districts submitting their representations to the City’s Local Plan Regulation 19 consultation. These meetings were held as follows: Cherwell -5.12.23; South and Vale -19.12.23; West Oxfordshire -19.12.23.

7.27 On 22nd December the Chief Executive of the City Council wrote to all the other districts’ Chief Executives to ask formally for assistance in meeting Oxford’s unmet housing need.

7.28 A joint response was received from South and Vale District Councils on 19th January 2024. It states: *“Our recent representations to your Regulation 19 stage Local Plan 2040 reiterate our earlier responses to state that, as matters stand at present, your emerging Local Plan 2040 fails the legal duty to cooperate. We have also identified several soundness issues, and set out our long-standing concerns relating to the flaws in your evidence base on housing need and housing capacity, which inform your Regulation 19 local plan.*

“Considering this context and a lack of progress in resolving these matters, neither South Oxfordshire District Council nor Vale of White Horse District Council can currently agree to meet any unmet housing need that exists for the period after 2036 i.e. new unmet housing need that has not

previously been accommodated, as we are not persuaded by your evidence base (given its deficiencies)."

7.29 A response was received from West Oxfordshire District Council on 30th January. It states:
*"Our two Councils have a record of working constructively with each other, and with other partners, to address cross boundary planning issues in Oxfordshire. There is a mutual understanding of the challenges facing our two authorities, and dialogue can help support a holistic approach on important issues like housing, employment and the environment.
"...we are currently in the process of commissioning our own local housing needs assessment in line with national policy and will shortly be undertaking an assessment of potential capacity in the form of a housing land availability assessment. You will appreciate that it is only once we have completed these and other studies and progressed the draft plan to a more advanced stage, that we will be in a position to understand whether or not the District Council is able to assist you in any way in relation to the housing need you have identified."*

7.30 A response was received from Cherwell District Council on 8th March. It states:
*"May I begin by recognising the cooperative work undertaken between our officers on assessing housing needs following the cessation of work on the Oxfordshire Plan in August 2022 and the countywide work on housing need that had been taking place up until that point.
"The Housing and Economic Needs Assessment (HENA) produced by our two authorities in December 2022 is a key part of our local plan evidence base and relied upon in producing a draft of our emerging Plan which we consulted upon from September to November 2022.
OPPO work on joint SoCG.
"The 2020 adopted Partial Review of our 2015 Local Plan provides unambiguous commitment to delivering 4,400 homes in the interest of meeting the identified unmet housing needs of Oxford. Development briefs have been prepared and decisions are emerging for a number of these sites.
"The proposed spatial strategy within the consultation draft of our new, emerging Plan highlights a commitment to ensure the successful implementation of the committed 4,400 homes.
"The proposed housing requirement for the emerging Plan (Table 3) suggests a potential allowance for Oxford's unmet housing need for the period to 2040 (Table 2) having considered the conclusions of the HENA.
"Our Plan requires further preparation and evidence will be tested at respective Local Plan Examinations. However, it is clear that we have engaged positively in joint working and ensured that the possibility of accommodating some additional housing to assist Oxford to 2040 is within the scope of our consideration."*

7.31 A Joint Statement of Common Ground was agreed focussing on the strategic matters of housing need, housing capacity and unmet housing need. OPPO took the lead in drafting this statement, it was an item at each monthly OPPO meeting between June 2023 and March 2024, with email correspondence between OPPO officers between. This was agreed and signed ahead of submission of the plan. This Statement of Common Ground has been prepared specifically in relation to Oxford's Regulation 19 submission draft Local Plan 2040. The City Council's letter of 22nd December 2023 and those received in response are appended to the Joint Statement of Common Ground between Cherwell, Oxford City, South Oxfordshire, Vale of White Horse and West Oxfordshire District Councils.

7.32 In January and February 2024 a series of bi-lateral meetings were held between the City Council and each of the other districts primarily to discuss Statements of Common Ground. These meetings were held as follows: Cherwell -26.1.24; South and Vale - 9.2.24; West Oxfordshire - 22.2.24. Before and after those meetings there was exchange of drafts and proposed amendments

via email. Statements of Common Ground were signed with each of the District and County Councils in time for submission.

Appendix 1: Summary timeline of meetings and publications

| 2014-2018: Post-SHMA joint working and Housing and Growth Deal | | |
|---|-----------------------------|--|
| Date | Type of engagement | Details |
| April 2014 | Evidence publication | Publication of Oxfordshire SHMA |
| November 2014 | Growth Board Meeting | Agreed programme of work for addressing the unmet housing need arising from the Strategic Housing Market Area (SHMA) for Oxford City |
| 2014 | Evidence publication | Oxford Strategic Land Availability Assessment (SHLAA) published |
| November 2014 | Evidence publication | Cundall report (a critique of the City Council's SHLAA commissioned by South, Vale and Cherwell) published |
| May 2015 | Evidence publication | City Council's response to Cundall published |
| May 2015 | Evidence commission | Fortismere Associates appointed by the Oxfordshire Growth Board to act as a critical friend on its 'post SHMA Work Programme' and "to review the Oxford City SHLAA, to satisfy partners that the assessment of the ability to meet the stated level of unmet housing need is correct |
| June 2015 | Evidence publication | Cundall response to City Council's response published |
| October 2015 | Evidence publication | LUC Green Belt Study published (commissioned by Oxfordshire County Council (on behalf of the six Oxfordshire Local Authorities) to assess how the land within the Oxford Green Belt performs against the purposes of Green Belt |
| June 2016 | Evidence publication | LUC Assessment of Strategic Options published |
| 19.11.15 | Growth Board meeting | Agreed working assumption 15,000 for Oxford's unmet housing need |
| 26.9.16 | Growth Board meeting | Decided on an apportionment of 14,850 for consideration in the preparation of Oxfordshire authorities Local Plans |
| November 2016 | Policy agreement | The Memorandum of Co-operation on the apportionment of 14,850 homes was signed by all other Oxfordshire authorities with the exception of South Oxfordshire District Council |
| December 2016 | Policy publication | Vale of White Horse Local Plan 2031 Part One adopted (based on SHMA) |
| 2017 | Policy publication | Oxfordshire Strategic Economic Plan published |
| October 2017 | Oxfordshire Leaders meeting | Oxfordshire Leaders consider business case for and recommend work on joint spatial plan |
| 30.10.17 | Growth Board meeting | Oxfordshire Growth Board consider business case for and recommend work on joint spatial plan |
| November 2017 | Evidence commission | Oxford commissions SHMA roll forward |
| November 2017 | Government publication | National Infrastructure Commission (NIC) publishes "Partnering for Prosperity: A new deal for the Oxford-Milton Keynes-Cambridge arc" including the announcement of a preferred corridor for the expressway and the commitment to its funding |
| 26.9.17 | Growth Board meeting | First OxIS approved |
| 22.11.17 | Government publication | Autumn Budget Statement announcement of the Oxfordshire Housing and Growth Deal |

| | | |
|--|--------------------------|--|
| November 2017 | Policy publication | Oxfordshire Local Industrial Strategy agreed with government |
| February 2018 | Growth Board meeting | Governance structures within Oxfordshire to help manage the Growth Deal programme agreed |
| <u>2018-2022: Oxfordshire Plan 2050</u> | | |
| March 2018 | Government publication | Growth Deal signed by government |
| April 2018 | Stakeholder event | JSSP (Oxfordshire Plan) Internal Stakeholder Launch Event within partners |
| 31.7.18 | Growth Board meeting | Growth Board considers drafts of Scoping Document, LDS and SCI |
| September 2018 | 5x LPA Cabinet meetings | Approve LDS, Scope and SCI for consultation (CEB: 19.9.18) |
| September 2018 | Policy publication | West Oxfordshire Local Plan 2031 adopted (based on SHMA) |
| September 2018 | Stakeholder event | JSSP (Oxfordshire Plan) Stakeholder event |
| October 2018 | Government publication | Government published a response to the NIC recommendations |
| Nov. 2018 –Jan. 2019 | Public consultation | Public consultation on the draft JSSP SCI |
| 21.1.19 | 5x LPA Scrutiny meetings | Consider Cabinet report to: Approve Oxfordshire Plan Reg18pt1 for consultation and approve amendments to LDS (City Scrutiny: 21.1.19) |
| 22.1.19 | 5x LPA Cabinet meetings | Approve Oxfordshire Plan Reg18pt1 for consultation and approve amendments to the LDS (City CEB: 22.1.19) |
| 29.1.19 | Growth Board meeting | Note the draft Reg18pt1 document |
| Feb-March 2019 | Public consultation | Public consultation on the Oxfordshire Plan Reg18pt1 (6 weeks) |
| October 2019 | Policy publication | Vale of White Horse Local Plan 2031 Part 2 adopted (based on SHMA) |
| December 2019 | Evidence commissioning | Brief for the OGNA published and advertised on South East Business Portal |
| 13.5.20 | Liaison meeting | Minutes: <u>OGNA</u> <i>Growth trajectories being modelled, including Standard Method. Discussions ongoing with Steering Group and consultants to develop 3-5 distribution scenarios for modelling against the trajectories. For more details contact your district rep on Steering Group.</i> <i>The initial presentation for all members (about scope of the study) was circulated to Liaison Group last meeting and will be trialled at Member Steering Group this week for their feedback. Intention is to then roll it out to Members later in May</i> |
| 3.6.20 | HoP meeting | Presentation of emerging OGNA findings with consultants and EOG members Minutes: <i>Presentation on emerging OGNA work from Cambridge Econometrics and Icen</i> <i>Group agreed it was a helpful presentation</i> <i>At the last Member Sub Group meeting, (Plan Team) trialled a presentation that outlined what this piece of work is seeking to do and what it will not be doing. Members were supportive of the idea of rolling it out on a wider membership basis. Team are now exploring ways of</i> |

| | | |
|----------------|-------------------------------|---|
| | | <i>recording a narrative over the presentation which can be circulated more widely and will help take members on this journey with us. ACTION: Each district to decide on arranging to share with their own councillors. View to sharing completed presentation end-June/July.</i> |
| 10.6.20 | Liaison meeting | Minutes: <i>OGNA Presentation for Members: Presentation is substantially unchanged from the draft presented to Member Sub-Group and focusses on the scope and remit of the OGNA. No outputs at this stage. Narration is being finalised and should be available mid-June for circulation. Each district can then decide how they want to share with their own councillors.</i> |
| June 2020 | Policy publication | Oxford Local Plan adopted (based on SHMA and SHMA roll forward) |
| 3.7.20 | HoP meeting | HoP informed OGNA powerpoint now going to all members and a discussion on <i>“how to present district housing numbers within OGNA whilst keeping the focus on Oxfordshire’s need”</i> |
| 8.7.20 | Liaison meeting | Minutes: <i>Feedback from Heads of Planning (3rd July)</i> <ul style="list-style-type: none"> • <i>Introductory powerpoint on OGNA should now be going out to all members</i> • <i>Conversation about how to present district housing numbers within OGNA whilst keeping the focus on Oxfordshire’s need</i> |
| September 2020 | Policy publication | Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford’s Unmet Housing Need adopted (based on SHMA) |
| 15.10.20 | Member Steering Group meeting | The OGNA Stage 1 findings (the tested scenarios for level of growth) were shared |
| Nov/Dec 2020 | Public consultation | Consultation on the Strategic Vision |
| 19.11.20 | Member Steering Group meeting | The meeting reflected on the Stage 1 OGNA findings and had a presentation on the Stage 2 OGNA findings |
| December 2020 | Policy publication | South Oxfordshire Local Plan 2035 adopted (based on SHMA) |
| December 2020 | 5x LPA Scrutiny meetings | Consider Cabinet report to: agree the Strategic Vision (City Scrutiny: 1.12.20) |
| 9.12.20 | 5x LPA Cabinet meetings | Consider draft Strategic Vision (City Cabinet: 9.12.20) |
| February 2021 | Government publication | Government published <i>“An Introduction to the Oxford-Cambridge Arc Spatial Framework”</i> |
| March 2021 | Policy publication | Oxfordshire Strategic Vision agreed |
| March 2021 | Evidence completion | OGNA completed |
| April 2021 | 5x LPA Cabinet meetings | Agree the Strategic Vision (City Cabinet: 14.4.21) |
| June 2021 | Member briefings | OGNA findings were shared with wider members from constituent authorities |
| July 21 | 5x LPA Scrutiny meetings | Consider CEB report to: Approve Reg18pt2 for consultation and approve updated SCI (City Scrutiny: 14.7.21) |
| 19.7.21 | Growth Board meeting | Consider the Reg18pt2 document |
| July 21 | 5x LPA Cabinet meetings | Approve Reg18pt2 for consultation and approve updated SCI (City Cabinet: 21.7.21) |

| | | |
|--|---|--|
| 30.7.21-8.10.21 | Public consultation | Public consultation on Reg18pt2 document (OGNA published alongside) |
| 25.1.22 | Growth Board meeting/Policy publication | Updated OxIS (Phase 1) agreed and published |
| February 22 | 5x LPA Scrutiny meetings | Summary Report of Reg18pt2 consultation responses (City Scrutiny: 1.2.22) |
| 7.2.22 | OPPO meeting | Initial meeting with OGNA consultants on what further work and updates to OGNA will be needed |
| March 22 | 5x LPA Cabinet meetings | Summary of Reg18pt2 consultation responses (City Cabinet: 10.3.22) |
| March 22 | 5x LPA Cabinet meetings | Adopt revised SCl (City Cabinet: 16.3.22) |
| 25.04.22 | Chief Executives meeting | Councils discuss a proposed six step process to secure consensus on Oxfordshire Plan housing questions |
| May 2022 | Evidence commissioning | Agreed approach for the OGNA update work |
| 16.06.22 | Workshop | Facilitated workshop to co-design and agree the framework to present housing need and requirement options to elected members |
| 14.7.22 | Leaders meeting | Workshop with Chief Executives, Leaders and Cabinet Members and OGNA consultants |
| 2.8.22 | Leaders meeting | Follow up workshop |
| 3.8.22 | Public statement | Joint Statement on Oxfordshire Plan work stopping |
| 12.8.22 | HoP meeting | City confirms to the meeting that: instruction is to move at pace, there is a need to fill the evidence base on housing gap left by OxPlan, City will work with whoever wants to work with them on that |
| <u>Autumn 2022-present: Post-Oxfordshire Plan</u> | | |
| August 2022 | Emails | Initial discussions with Cherwell on progressing with OGNA update |
| 18.8.22 | City/Cherwell meeting | HENA inception meeting |
| 9.9.23 | HoP meeting | HoP informed about HENA commission |
| 27.9.22 | FOP meeting | Agree a new approach to co-ordinating planning across the county by updating the remit of the Oxfordshire Plan Advisory Group |
| 3.10.22 to 14.11.22 | Public consultation | City Council consult on Local Plan 2040 Reg18 pt1 document |
| 3.1.23 | Evidence publication | Cherwell papers published for Scrutiny (including HENA) |
| 6.2.23 | Evidence publication | Cherwell Executive – published HENA |
| 13.2.23 to 27.3.23 | Public consultation | City Council consultation on Reg18 part2 document (including HENA) |
| 27.3.23 | City/S&V meeting | To discuss the HENA |
| W/c 27.6.23 | City/district meetings | Series of bi-lateral meetings with districts on Local Plan housing evidence, HELAA, draft outputs and direction of travel |
| 30.6.23 | OPPO meeting | Minutes: <ul style="list-style-type: none"> “(City) took opportunity to ask for ideas on how to progress the housing conversation now that some of the previous governance arrangements have ended” Discussion on possible joint SoCG (S&V not keen, look at regs) |

| | | |
|--------------------|---------------------|---|
| 19.7.23 | OPPO meeting | Discuss process for considering unmet need, thoughts on the HENA and the unmet need approach proposed Minutes: <ul style="list-style-type: none"> • Meeting (except S&V) keen to progress a joint SoCG, (West) to explore • OPPO proposed as way forward to tackle H conversation. (City) promised to circulate a paper on H nos • S&V raise queries on HENA (S&V slides) |
| 2.8.23 | Email to OPPO | City shared draft HELAA report 2023 and referred to the draft capacity figure 10,298 2020-2040 (updating the figure from the interim HELAA in the Reg18 part 2 consultation) |
| 11.8.23 | Email to OPPO | City circulated paper on housing numbers |
| 5.9.23 | OPPO meeting | Minutes: <ul style="list-style-type: none"> • City shared annotated version of housing numbers notes with all comments collated • County shared paper on nos and posed questions • S&V shared annotated version of city note and asked about City legal advice • City said yes in a con; S&V asked City for in writing • S&V say “there is a lack of co-operation by not sharing exceptional circumstances.” |
| 13.9.23 | Workshop | Workshop with policy officers from all Oxfordshire districts and the County to discuss our approach to the HELAA |
| 22.9.23 to 3.11.23 | Public consultation | Cherwell Reg 18 Local Plan consultation |
| 3.10.23 | OPPO meeting | Minutes: <ul style="list-style-type: none"> • Workshop on Joint SoCG |
| 16.10.23 | OPPO email | City circulates legal advice on S&V HENA questions |
| 16.10.23 | OPPO email | City circulates extract of emerging housing background paper for Reg19 on exceptional circumstances |
| 7.11.23 | OPPO meeting | Minutes: <ul style="list-style-type: none"> • There was an action from last time for (City) to seek and circulate legal advice on the HENA points raised by (S&V) powerpoint which was shared at the July meeting. This legal advice was circulated on 16th October. There was a brief discussion around whether this advice helped address the issues raised by (S&V). (S&V) stated that they would be taking their own legal advice when their barrister was appointed. (S&V) stated that there were still planning issues outstanding with regards to S&V concerns on the HENA. (City) recognised this was always likely to be the case. (West): if City are happy with the risks related to their work but others have concerns that’ll be dealt with at examination. • (West) volunteers to streamline the joint SoCG |
| 6.12.23 | OPPO meeting | Minutes: <ul style="list-style-type: none"> • (City) as an update from the City, you’ll have seen our consultation material, we have booked meetings with each authority over the next week or so to discuss housing in more detail, we will be sending a formal letter requesting help with unmet need very shortly • The last meeting had agreed that a more straightforward approach to Joint SoCG might be helpful. (West) provided a |

| | | |
|----------|----------------------------------|--|
| | | <i>redraft just ahead of the meeting (circulated with these minutes) and ran the group through it. There are some key questions for the group to consider</i> |
| 22.12.23 | Chief Exec correspondence | Formal letter on unmet need sent by City Chief Executive to all district Chief Executives |
| 9.01.24 | OPPO meeting | Minutes: <ul style="list-style-type: none"> • (City) – The plan had been to collate everyone’s answers to (West’s) questions on the previous version to inform this item but only (S&V) responded yesterday. I’ve concluded that we won’t get that version agreed in time for my submission so yesterday circulated a suggested interim approach for my LP whilst we also progress the main joint one (Email and attachment circulated with these minutes). Did anyone have any thoughts on that approach? • (City) – can each authority pull together a few bullets that they think should be included by the end of next week and I can collate them and circulate a new draft ahead of our next meeting? Next meeting needs to be refining a nearly final version • ACTION: All to send (City) some draft wording (or few bullets) for collation by 19th January • (City): At the last meeting I promised a formal letter requesting help with unmet need – you all received that before Christmas. Does anyone have any thoughts or comments? • (West) – if people respond to the letter by 7th February we could discuss at the next OPPO meeting |
| 19.01.24 | Chief Exec correspondence | Joint response to letter of 22.12.23 received from South Oxfordshire and Vale of White Horse District Councils |
| 30.01.24 | Chief Exec correspondence | Response to letter of 22.12.23 received from West Oxfordshire District Council |
| 07.02.24 | OPPO meeting | Action was agreed: “All to review the latest draft [of the Joint SoCG] with intention to agree it between ourselves within a week to start circulating more widely” |
| 08.03.24 | OPPO meeting | Meeting discussed remaining outstanding issues on the Joint SoCG and agreed who would be signatories at each partner council |
| 08.03.24 | Chief Exec correspondence | Response to letter of 22.12.23 received from Cherwell District Council |
| 27.03.24 | Joint Statement of Common Ground | Joint Statement of Common Ground on housing need, housing capacity and unmet housing need relating to Oxford’s Local Plan signed |

Appendix 2: City Council’s August 2023 note on its housing number calculations

Note on Oxford’s Housing Numbers – August 2023

Introduction

Oxford City Council is preparing its new Local Plan covering the period to 2040; when adopted this will replace the Oxford Local Plan 2036.

At each consultation stage the other Oxfordshire Districts and the County Council made representations on the published material and bi-lateral conversations have been held with each party. At the OPPO meeting in June it was suggested that a note setting out the City Council’s workings would be helpful to those conversations. This note sets out the City’s calculations to date. It is drafted in the full knowledge that some of the districts intend to challenge the work behind constituent parts of the City Council’s evidence base but is intended to provide a helpful outline of the City’s work thus far.

This note presents the key elements of the City Council’s evidence base as follows:

| | | | | | |
|----|-------------------------|--------------|------------------------------|---------------|---------------------|
| A) | Housing Need (the HENA) | <i>minus</i> | Housing Capacity (the HELAA) | <i>equals</i> | Oxford’s Unmet Need |
|----|-------------------------|--------------|------------------------------|---------------|---------------------|

And then:

| | | | | | |
|----|---------------------|--------------|---|---------------|--|
| B) | Oxford’s Unmet Need | <i>minus</i> | Sites previously allocated in Oxfordshire Districts for Oxford’s unmet need (Current Local Plans) | <i>equals</i> | Additional Unmet Need for Oxford Local Plan 2040 |
|----|---------------------|--------------|---|---------------|--|

A) Housing Need minus Housing Capacity

Housing need (HENA):

The Housing and Economic Needs Assessment (HENA) (jointly commissioned by Cherwell and Oxford) uses four scenarios for calculating housing need. Two housing led scenarios and two employment led scenarios:

| | Housing led scenarios | | Employment led scenarios | |
|---------------------------------|-----------------------|----------------------|--------------------------|--------------------------|
| | Standard Method | 2021 Census Adjusted | 2022 CE Baseline | Economic Development Led |
| Housing Need (per annum) | 3,388 | 4,721 | 4,406 | 5,830 |

Figure 1: HENA scenarios

Cherwell and Oxford have agreed that the most appropriate scenario (based on Cambridge Econometrics economic forecasts) results in Oxfordshire’s housing need to 2040 as 4,406 dwellings per annum.

(The City Council acknowledges that it will need to make the case for the approach taken in the HENA and the exceptional circumstances at examination and that South and Vale intend to challenge the HENA.)

As this need is Oxfordshire-wide it is subsequently necessary to apportion this between the constituent local planning authorities. The HENA tests a range of ways of doing this including by using the same proportion as application of the Standard Method, according to distribution of jobs at baseline date, or according to distribution of jobs at the end of the study period. The City Council, based on the consultants’ advice, considers that the latter of these options is more appropriate. The HENA does not attempt to set the need for other districts, but the results of that apportionment are shown for information:

| CE Baseline Trend Scenario with Employment Based Distribution | Projected (2040) Distribution | |
|--|-------------------------------|--------------------------------------|
| | % of jobs in 2040 | Associated number of homes per annum |
| Oxfordshire | 100% | 4,406 |
| Cherwell | 22.9% | 1,009 |
| Oxford City | 30% | 1,322 |
| South Oxfordshire | 18% | 793 |
| Vale of White Horse | 16.2% | 714 |
| West Oxfordshire | 12.8% | 564 |

Figure 2: Indicative apportionment of HENA figure

Housing capacity (HELAA):

Due to a range of factors that limit the City's ability to accommodate need, Oxford has now had a housing requirement based on capacity for several plan cycles. The City Council is keen however to explore every opportunity to accommodate need within its own boundaries. A draft Housing and Economic Land Availability Assessment (HELAA) was published in Autumn 2022 alongside the Preferred Options consultation. That draft HELAA identified sites and windfalls that would total 9,147 dwellings for the Local Plan period 2020-2040. Since that draft was published, further work has been carried out to refine that capacity figure. This has included updated completions monitoring data, and planning permissions, an updated windfall assumption and work on 2040 Plan site allocations and updated landowner intentions. The total capacity now currently stands as **9,623 dwellings** in total over the Plan period, or 481 dwellings per annum. (The capacity figure of the adopted Oxford Local Plan 2016-2036 was 10,884, 1,934 of which were delivered in the years 2016-2020, prior to the base date of the 2040 plan).

Calculating unmet need:

Oxford's unmet need can therefore be calculated as follows:

| | | Total for plan period 2020-2040 | Homes per annum |
|---------------|----------------------------------|---------------------------------|-----------------|
| | Oxford's Need (HENA) | 26,440 | 1,322 |
| Minus | Oxford's Capacity (HELAA) | 9,623 | 481 |
| Equals | Oxford's Unmet need | 16,817 | 841 |

Figure 3: Calculating Oxford's unmet need

B) Unmet need minus previously allocated sites

The majority of the 2040 plan period overlaps with that of the previous round of Local Plans; the adopted Oxford Local Plan runs until 2036, the Local Plans in other districts run to 2031 or 2035. A series of sites to accommodate Oxford's unmet needs were identified and adopted in those Local Plans following Duty to Co-operate conversations, joint cross-county work on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and the signing of the Oxfordshire Housing and Growth Deal with the government in 2018.

The SHMA identified housing need for Oxfordshire over the previous period (2011-2031) was 100,060 homes. The working assumption of Oxford's unmet housing need was 15,000 homes for the period 2011-2031, apportioned and allocated as follows through a Memorandum of Understanding:

| District | Apportionment (2011-2031) |
|---------------------|---|
| Cherwell | 4400 |
| Oxford | 550 |
| South Oxfordshire | 4950 (South Oxfordshire did not sign the MoU although this figure is incorporated within the South Oxfordshire Local Plan 2034) |
| Vale of White Horse | 2200 |
| West Oxfordshire | 2750 |
| Total | 14,850 |

Figure 4: MoU working assumption of apportionment of Oxford's unmet need

Each of the Oxfordshire authorities made provision for the above figures through the last round of Local Plans. In total, the other Oxfordshire districts made provision for and allocated sites to accommodate **14,300** dwellings (14,850 minus the 550 apportioned for Oxford). Many of these sites have started to be delivered or are in pre-application or planning application stages. In addition, nominations agreements over the affordable housing element of that provision have also been signed with WODC, SODC and VoWH.

Calculating Additional Unmet Need:

Beyond the already allocated sites for Oxford's unmet need in current Local Plans, the figures above lead to additional unmet need of 1,404 homes over the plan period calculated as follows:

| | | Total for plan period 2020-2040 |
|---------------|--|---------------------------------|
| | Oxford's Unmet Need | 16,817 |
| Minus | Already allocated sites for Oxford's Unmet Need | 14,300 |
| Equals | Oxford's Additional Unmet Need outside of already allocated sites | 2,517 |

Figure 5: Calculating Oxford's Additional Unmet Need

Whilst the overall unmet need for Oxford over the plan period (2020-2040) totals 16,817. 14,300 of those homes have already been allocated in Local Plans, the vast majority of which did not (or will not) deliver before the current plan periods. These allocations could therefore be re-allocated to meet the new unmet need. The additional unmet need beyond this, to cover the whole period to 2040 is 2,317. For comparison, the sites allocated for Oxford's unmet need in the last round of plans was 14,300 or 715 dwellings per annum. Oxford's unmet need calculated for the period 2020-2040 is 16,817, or 841 dwellings per annum, which is a difference of 126 dwellings per annum compared to the previous plan period.