



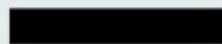
Oxford City Plan 2040  
Examination

**Matter 2 The Duty to Co-operate  
Hearing Statements**

May 2024



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



## MATTER 2: THE DUTY TO CO-OPERATE

### Housing Needs and the Housing Requirement

Q1. Who has the Council engaged with in terms of housing needs and the housing requirement. When did this take place and what form did it take?

1.1.1 Gladman consider this is primarily for the Council to answer. However, a detailed history of the development of housing needs evidence for the Oxford Local Plan and wider Oxfordshire area is set out in Background Paper 17 (BGP.017).

Q2 What factors led to the decision to cease work on a joint plan for Oxfordshire?

1.1.2 Gladman consider this is primarily for the Council and wider Oxfordshire authorities to answer and we also refer to Stantec's hearing statements.

Q3. How did engagement with other authorities in Oxfordshire change after this decision?

1.1.3 A new working arrangement for joint working on planning matters was established in September 2022 with the focus of engagement between officers (Further information is set out in BGP.016).

Q4. How and when did the Council engage with other authorities in Oxfordshire in relation to the Housing and Economic Needs Assessment (HENA)? Why was it only commissioned by Oxford City and Cherwell District Councils?

1.1.4 A detailed history of the development of housing needs evidence for the Oxford Local Plan and wider Oxfordshire area is set out in Background Paper 17 (BGP.017). This document identifies and explains the cessation of the Oxfordshire Plan 2050 and the subsequent processes of the city progressing plan-making and the need to fill evidential voids created by work on the Oxfordshire Plan 2050 been halted.

- 1.1.5 It is clear that Oxfordshire authorities were aware of Oxford City's desire to progress plan-making and had opportunities to support and join housing need evidence development from August 2022 (see paragraphs 7.2 to 7.7 of BGP.017).
- 1.1.6 Oxford City and Cherwell District are the only authorities which have, at this moment in time, committed to continuing the long history of cross-boundary cooperation and delivering the employment and housing growth ambitions of the county, building upon the legacy work from the Oxfordshire Plan 2050.
- 1.1.7 It appears that the other Oxfordshire authorities did not sign up to the HENA due to their approach to new housing growth and concerns surrounding the methodology for identifying future housing needs for the County.

Q5. Why was the decision taken to assess housing needs on an Oxfordshire wide basis and then set out a distribution of this by individual district authorities? Were the other authorities involved in this decision?

- 1.1.8 This is largely set out in paragraphs 9-10 of the CSD.012. However, given the historical context of plan-making and the identification and calculation of housing needs across the county this is an appropriate and rational approach.
- 1.1.9 As identified in response to Q4, other Oxfordshire authorities had the opportunity to, but did not, contribute and be involved in the housing need evidence preparation due to political positions on housing needs which derived from historic plan-making and then the Oxfordshire Plan 2050.

Q6. What was the response of the other authorities to the Regulation 18 consultations on the issue of housing need and the housing requirement? How did the Council take this into account going forward?

- 1.1.10 South and Vale have highlighted objections to the housing need/requirement approach taken by Oxford City primarily on the basis that the evidence should not consider and provide conclusions on need for areas outside of the City's administrative boundary alongside disagreement with the identification of exceptional circumstances to deviate from the use of the standard method for calculating housing needs.

1.1.11 This will be explored in our hearing statements to matter 3. However, this is clearly an incorrect, unreasonable and unjustified conclusion given the functional geographies and economies of Oxfordshire and that historically housing needs have been established on a county-wide basis to support housing and employment growth. The NPPF identifies that exceptional circumstances may justify an alternative approach to calculating housing needs which reflect current and future demographic trends and market signals which clearly exist in the case of Oxford City and Oxfordshire. The Council has attempted to account for the unique functional economy and geography of the county to establish a housing requirement for the city area, as the core of the functional area, despite formal joint plan making arrangements through the Oxfordshire Plan collapsing.

Q7. How has the Council engaged with the other authorities in relation to the capacity of Oxford City to accommodate housing?

1.1.12 Gladman consider this is for the Council to answer, although significant evidence and information is set out within the Duty to Cooperate, Statement of Common Ground and BGP.017 documents.

Q8. How and when did the Council discuss the conclusions of the HENA, the estimate of capacity, the resultant housing requirement and the implications for unmet need?

1.1.13 It appears that the Council sought guidance from the other authorities on the approach and timings for when a detailed discussion could take place on the HENA in January 2023. According to paragraph 7.8 of the BGP.017, South and Vale identified that they would respond during the consultation period.

Q9. How and when did the Council directly request the other authorities to assist in accommodating unmet housing need? What implications did this have for cooperation?

1.1.14 It is unfortunate that Oxford City only wrote to formally request assistance with their unmet housing needs in December 2020. This formal request could have taken place earlier in the plan-making process given the likelihood that assistance would be required, but it would appear that the Council waited on final confirmation and clarity on housing need and requirement numbers.

## **Other Strategic Matters**

Q.11 Are there any other genuinely strategic matters as defined by S33A (4) of the Planning and Compulsory Purchase Act 2004, including any site allocations that may have cross boundary implications?

**1.1.15** Gladman consider that should the Inspectors progress the Local Plan examination and agree on the position of housing needs and any residual unmet needs, then the site allocations which neighbouring authorities may identify to address unmet housing needs will have cross-boundary implications for Oxford City and Oxfordshire and should involve Oxford City in the identification and development of those allocations. However, this is a matter which will have to be addressed through those plan preparation and examination processes.

## **Overall**

Q.13 In overall terms has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan?

**1.1.16** Yes, the Council has clearly engage constructively, actively and an ongoing basis over a significant period of time. A failure to reach an agreement, at the current time, on the housing needs with all neighbours is not a failure to have satisfied the duty to cooperate.