





CPRE Oxfordshire also consider numerous factors have not been given consideration and, where necessary quantification within the HENA; for example:

- How does this approach relate to the Council's Net Zero strategy? What are the carbon consequences – both embedded and ongoing – of this level of housing?
- How likely is it that this level of housing growth will actually meet the real need for genuinely affordable housing, and should the focus be on 'what' rather than 'how many'?
- What are the consequences of this exaggerated proposal for growth for tackling our biodiversity emergency (declared by the District Councils)?
- How can education, health, water and transport infrastructure keep pace with this above trend growth?
- How does this approach sit alongside the Levelling Up agenda, since it is based on pulling in migrants from less affluent parts of the UK?

The Housing and Economic Need Assessment (HENA) report, consulted on in the Reg 18, Part B consultation must be revisited. Consultation feedback must not just be reported, it must be considered and acted upon.

### 3. What is the basis for choosing the CE Baseline scenario and departing from the standard method scenario? Is this justified?

CPRE Oxfordshire does not consider deviation from the standard method to be justified. National Policy has not been adhered to. National Policy states that the Standard Methodology should be used to assess housing requirements unless there are exceptional circumstances. Diversion from the Standard Method is premature given that the full Census results are not yet available and that this is still the Government's mandated methodology. However, if it is to be reviewed, this should also be in the light of other urgent considerations – in particular our biodiversity and climate emergencies.

We give little credence to the LEP's Investment Plan as this was produced behind closed doors and not subject to public consultation or constrained by any consideration of its environmental or social impacts. It is in effect just a marketing document or wishlist and is not an appropriate basis on which to make long-term projections.

The Levelling Up agenda is ignored throughout the HENA but requires serious consideration. The CE-baseline model is based on Oxfordshire's population increasing by nearly 27% by 2040. This compares to ONS estimates for UK population increase of less than 5%. Therefore, Oxfordshire could only achieve this level of growth at the expense of significant in-migration from elsewhere in the country.

**Overall, we do not accept that the City Council has established the exceptional circumstances required for deviating from the National policy advise to use Standard Method.**

In addition to our view that this approach does not follow national policy we also believe the approach Oxford City is proposing is not compatible with the Oxfordshire Strategic Vision which commits all our authorities to planning for 'good growth' that is both sustainable and inclusive.

### 4. What is the basis for choosing the apportionment between authorities based on the distribution of forecast jobs? Is this justified?

It is not justified; using the 2040 employment pattern maximises the share for Oxford (30%) and, given capacity constraints, will therefore maximise the overspill to the other four districts and increase pressure on the Green Belt. Using the nationally advised Standard Method base would reduce Oxford's share to 22.5%.



The current arbitrary apportionment between authorities ignores the fact that each Council is entitled to review and set its own policy with regards to new employment space, taking into account its own evidence and views on both national and local economic circumstances and overall priorities.

5. [What are the objectives of identifying a housing need of 1,322 homes per annum \(26,440 over the plan period\) for Oxford City and what are the intended outcomes?](#)

The City Council quite rightly seeks to address the housing affordability crisis within the City. However, the Government's standard methodology already allows for a significant uplift in numbers to reflect affordability issues. In addition, there is no evidence to suggest that simply building more houses has any significant impact on housing affordability.

The City Council contends that high levels of economic growth will inevitably come to the City so that housing must be generated to accommodate it. However, there is an alternative scenario which prioritises the well-being of existing residents and constrains growth to maximise the social and environmental outcomes. Indeed, the FOP Vision and the latest Oxfordshire Strategic Economic Plan put well-being centre stage and highlight the importance of the foundational economy. When considered on a national scale, in the context of the Government's Levelling Up agenda, this is a more logical approach.

*Capacity within Oxford City and the resultant housing requirement*

6. [How has the capacity to accommodate housing within Oxford City been assessed? Has the process been sufficiently thorough and robust? Could the capacity estimate be increased by altering assumptions or policy approaches? If so, what effect would this have?](#)

The housing requirement has not been positively prepared and the City is currently squandering opportunities to develop housing on large-scale city centre brownfield sites.

Research by CPRE Oxfordshire has revealed that over four key urban sites within the City, estimated figures suggest the creation of 14,015 jobs but only 714 homes (see Table 1 in full response to Reg 18, Part B consultation). Clearly this trajectory will considerably up the pressure on housing supply, which could then only be met by releasing far less sustainable greenfield / Green Belt sites away from the City.

Given the high levels of employment within the City, we believe that the Plan should do more to address the issue that any new employment space simply draws in more people from outside the City and therefore increases demand for housing. The City should be seeking to minimise this increased demand, to minimise the need to offload housing need onto its neighbours. New employment sites should only be permitted if accompanied by sufficient new housing to compensate for the anticipated demand arising from that site.

The City should re-prioritise its policy to focus on the delivery of high density housing. If landowners (including the colleges) do not wish to release land in this way then the City should not be afraid to consider compulsory purchase options.

It seems that Oxford City Council is keener on asking neighbouring District Councils to sort out its housing problems than trying to do so itself. Presumably because it keeps a substantial amount of the business rates received, it seems happier to attract new commercial development and likewise to offload the financial burden of providing services for new homes and their extra residents.



7. Is it appropriate to set the housing requirement to exactly match the identified capacity (notwithstanding the use of some discounting)? What implications would this have for future assessments of housing land supply? Should more flexibility be built in between the requirement and the estimate of capacity?

*Unmet housing need*

8. How and where is it intended to meet the unmet need of 841 homes per annum (16,828 over the plan period)?
9. What agreements are in place to do this and what is the position of other authorities, including in relation to continuing commitments in existing adopted Local Plans?

CPRE Oxfordshire are unaware of any agreement in place with other authorities. As per guidance (<https://www.gov.uk/guidance/duty-to-cooperate>) *“The duty to cooperate is not a duty to agree and local planning authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the National Planning Policy Framework, for example policies on Green Belt, or other environmental constraints.”*

South Oxfordshire, Vale of White Horse and West Oxfordshire have all indicated that they are opposed to the findings of the HENA report and the unmet housing need figures allocated to their respective districts.

10. How do housing requirements in adopted Local Plans in other authorities compare with standard method calculations of housing need?

South Oxfordshire and Vale of White Horse all propose use of the Standard Methodology within their emerging draft Local Plans. They conclude that “exceptional circumstances” do not exist to deviate from this and CPRE Oxfordshire concur with this view.

11. Will the full unmet need realistically be delivered by other authorities?

South Oxfordshire, Vale of White Horse and West Oxfordshire have all indicated strong opposition to the HENA report findings and meeting the unmet need identified for their respective districts.

CPRE Oxfordshire strongly support the findings of the Independent Review of the Oxfordshire Housing and Economic Needs Assessment prepared for Cherwell District and Oxford City Councils -Report of Findings for South Oxfordshire and Vale of White Horse Councils and presented as Appendix 2 in the response from South Oxfordshire and Vale of White Horse councils. This report concluded :

"the standard method calculation identifies the Local Housing Need mandated by Government for every local authority area. Based upon the demographic and employment data for Oxford City and Cherwell (and the rest of Oxfordshire) the HENA 2022 does not provide any justification for using an alternative approach or different housing need figure anywhere in Oxfordshire."

Additionally , a level of pragmatism is also required as to what is deliverable by the City and its neighbouring districts. The Oxfordshire Housing & Growth Deal set a target of 5,000 dwellings per annum (dpa) across the county. In the period since 2011, the average delivery has been only 3,865 dpa. For Oxford, average delivery is only 288dpa against a target of 550 dpa. Given the current economic outlook, it seems highly unlikely that there will be much change in this situation in the foreseeable future.



12. What are the implications for emerging Local Plans in these authorities?

The level of housing being placed on neighbouring districts would have major consequences for the environment and residents' quality of life within these districts, but these appear to be completely off the Council's radar when it comes to assessing the housing requirement. These factors must be given due consideration.

13. How would delivering unmet need in other authorities achieve the objectives and outcomes intended, for example in terms of commuting and addressing affordable housing needs in Oxford City?

Traffic constraints within the City are already significant, to the point of intense social and political controversy. This is before the impacts of the nearly 20,000 new houses already allocated in existing Local Plans are delivered, on what was formerly Green Belt land. Further offloading of housing to the Districts can only serve to exacerbate this issue and make it impossible to provide housing in a sustainable manner.

We recognise that the City Council is committed to trying to find affordable housing solutions for its residents and to supporting the world-class education and research offered by our universities. However, this must not come at the expense of Oxfordshire's environment, which in fact underpins the health and wellbeing of both residents and the economy.

14. If Oxford City's housing need was calculated using the standard method, what would be the implications for the scale of unmet need and the potential for it to be met by other authorities?

A level of unmet need would still exist, although we contend that a fair proportion of this could be addressed by reviewing policy on employment sites and increasing the density of development. However, the overall scale of unmet need would significantly reduce, thereby increasing the potential for the Districts to accommodate this in a sustainable manner.

**-END OF STATEMENT-**