

## Oxford City Plan 2040 Examination

# Matter 3 Housing Need and the Housing Requirement Hearing Statements

May 2024







## MATTER 3: HOUSING NEED AND THE HOUSING REQUIREMENT

### The HENA and Housing Need

- Q1. Why does the HENA seek to assess the housing need for Oxfordshire and all of the individual authorities? Is this justified?
- 1.1.1 Yes, the approach of the HENA seeking to assessing the housing need on an Oxfordshire-wide basis is justified.
- 1.1.2 Oxford City is the core of the economic and geographical market area of Oxfordshire which has a corresponding housing market area, as identified through long-standing, historic and effective plan-making processes and indeed, economic strategies.
- 1.1.3 It is a common position between the Oxfordshire authorities, as identified in the signed Statement of Common Ground (SOCG) that the assessment of housing need is a strategically important matter which has important cross-boundary implications for local plan-making and indeed, there may be exceptional circumstances which justify an alternative approach to assessing housing need. Such an approach should reflect current and future demographic trends and market signals.
- 1.1.4 It is therefore justified that the HENA assesses housing need for the whole market area, as the factors which determine housing and employment needs for each authority area, such as migration, commuting patterns and administrative boundaries and inextricably linked.
- Q2. How does the HENA arrive at the four scenarios for housing need? What evidence sources and assumptions are used? Are these appropriate and justified?
- 1.1.5 Yes, the scenarios are robust and justified.
- Q3. What is the basis for choosing the CE Baseline scenario and departing from the standard method scenario? Is this justified?
- 1.1.6 Yes, departure from the standard method is justified to reflect economic growth prospects and trends across the nationally important Oxfordshire region, worsening housing affordability and to address in-commuting levels.



1.1.7 As outlined in our Regulation 19 consultation submission which is supported by representations submitted by Stantec on behalf of a consortium of parties, including Gladman, the housing need in Oxfordshire may be understated and it is considered that 5,000 dwellings per annum (dpa) across Oxfordshire, including 1,500 dpa in Oxford City, represents a more suitable housing need figure.

### **Capacity within Oxford City and the resultant Housing Requirement**

Q7. 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?

- 1.1.8 Yes, it is appropriate to set a capacity-based requirement this is a common approach which is also being explored by authorities such as Bristol. However, it is vital that all efforts have been made to explore and realise the true housing supply capacity of the authority area, such as Green Belt reviews.
- 1.1.9 The requirement to review the Local Plan within 5 years of adoption offers the opportunity to review delivery and supply figures alongside any factors which may impact, both positively and negatively, the supply capacity of the authority. Therefore, the figure represents a justified and reasonable approach to setting a housing requirement for the authority.

### **Unmet Housing Need**

Q8. How and where is it intended to meet the unmet need of 841 homes per annum (16,828 over the plan period)?

- 1.1.10 It is our understanding that only Cherwell District has identified the ability to accommodate additional unmet housing needs arising from Oxford City up to 2040.
- 1.1.11 This does not appear to be confirmed in Background Paper 001 (BGP.001), however the Cherwell Local Plan Review 2040 Regulation 18 consultation document (September 2023) identified that should the unmet need be distributed to the other



districts to the same percentages as previously occurred in 2014, Cherwell would accommodate 284 unmet homes per annum.

- 1.1.12 Further clarity is required from the Council and wider Oxfordshire authorities.
- 1.1.13 During the previous round of plan-making across the region and as a result of the 2014 SHMA, the Oxfordshire authorities sought to understand the options to address the working assumption that there would be unmet housing needs arising from Oxford City. This resulted in the Oxfordshire Spatial Options Assessment, which had the aim to provide a criteria-based analysis of the spatial options for meeting Oxford's unmet housing need.
- 1.1.14 The report identified 36 spatial sites as appropriate for further assessment due to their reasonable level of relationship to Oxford but did not make recommendations on which sites should be taken forward through Local Plans across the county, but outlined an assessment of the sustainability of each site.
- 1.1.15 Indeed, this contributed to the development of all of the neighbouring authorities' Local Plans and identification of sites for unmet housing needs. As further information and evidence came to light during the preparation of these plans other alternatives were identified through the Sustainability Appraisal processes such as Barnard Gate Garden Village in West Oxfordshire.
- 1.1.16 Clearly time has moved on since 2015 and the examination of Local Plans around the county, with new sites opportunities coming forward, as shown by sites identified by Cherwell District and the emergence of Barnard Gate as credible and deliverable options for meeting unmet housing needs arising in Oxford City. However, there is already a basis and approach for delivering unmet housing needs which has been successful and this could be updated to ensure that all homes are delivered in line with Local Plan(s) aspirations.

### Q11. Will the full unmet need realistically be delivered by other authorities?

1.1.17 In current emerging plans as drafted, there is no certainty that the full unmet needs will be met.



- Q12. What are the implications for emerging Local Plans in these authorities?
- 1.1.18 This plan should quantify the unmet need and direct neighbouring authorities to work jointly to establish what relevant contributions will be made to ensure that full needs are met in the county.
- Q13. 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?
- 1.1.19 As identified in response to question 8, there is already an existing evidence base and assessments which exist and which could be revised and updated to account for newly identified sites and local plan aspirations and objectives.
- 1.1.20 Opportunities exist to align meeting housing needs and aspirations such as to reduce in-commuting to Oxfordshire such sites which can deliver a wide range and types of homes alongside strategic infrastructure, such as highway and rail networks to improve current transport environments.