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**Oxford City Council response
to Inspectors initial questions
and comments - AMENDED**

Question 2

July 2019

NOTE: It has been brought to the Council's attention that there was an erroneous calculation in the original response to this question. The SHMA 2014 period was 20 years between 2011/12 and 2030/31 although often referred to in shorthand as 2031. In our response we had incorrectly calculated the scenarios using the period 2011/12 to 2031/32. Therefore, in scenario 1 we had multiplied 544 by 16 years (2016/17 to 2031/32) instead of 15 years (2016/17 to 2030/31). The same issue then occurs in scenario 2 where the supply is taken for 2016/17 to 2031/32 instead of 2016/17 to 2030/31. This has been amended as ~~strikethrough text~~.

Question 2: Timescales and wider planning

We note that the Oxfordshire Housing and Growth Deal Plan assumes that the capacity of Oxford is 10,000 dwellings, but this is a figure to 2031. The submitted Plan indicates a capacity of 8,620 to 2036. Please can the Council comment on the cause of the substantial difference in capacity, and the implications for that and the different plan end-dates on the planning of the wider Oxfordshire area.

- 2.1 The Oxfordshire Housing and Growth Deal ("the Housing and Growth Deal") runs from 2011-2031 and the Oxford Local Plan 2036 ("the Plan") runs from 2016-2036. This provides for at least a 15 year plan period post adoption of the Plan. The calculation of Oxford's housing need to 2036 is detailed in the Assessing and Meeting Housing Need Background Paper (BGP.3). The housing need for the plan period was re-based for the plan period through the housing needs update in 2018. This means that any backlog of supply is not added to the requirement as it is reflected in the in the modelling through market signals adjustment for the period 2016-2036 rather than through a separate calculation or specific response.
- 2.2 Since submission of the Plan in March 2019, the housing trajectory and Housing and Economic Land Availability Assessment (HELAA) have been updated in response to completions and commitments data to March 31 2019 and to ensure that the trajectory reflects changes in the NPPF and the confirmed nationally prescribed ratio of communal accommodation (student only households and other communal accommodation) set out in the Housing Delivery Test.
- 2.3 As a result of these updates the capacity based housing requirement for Oxford City 2016-2036 has been established to be 10,884. This equates to an annual average requirement of 544 dwellings per annum. The updated trajectory and accompanying note has been submitted to the Planning Inspectors (EXM.3-5).
- 2.4 The figure 1 below summarises the capacity making up the revised housing trajectory for 2016-2036.

Figure 1: Oxford Local Plan 2036 – components of capacity based housing requirement

	2016-2036
Completions 2016/17 to 2018/19 *	1,159
Outstanding Commitments < 10	303
Anticipated supply from deliverable sites HELAA 2019**	7,518
Windfalls	1,904
Total capacity based housing requirement	10,884
Average Annual requirement	544

*The figures used reflect the figures reported in the 2018 Housing Delivery Test measurement, which included the new national ratio for communal accommodation, so they differ from those in AMRs from 2015/16.

**This includes the 10% discount for non-delivery of future anticipated supply (explained at paragraph 3.9 of the draft OLP and Assessing and Meeting Housing Need Background Paper, BGP.3)

2.5 Between 2011/12-2015/16 there were 1,428 completions. These are set out in the Annual Monitoring Report 2017/18 but reflect the figure reported in the Housing Delivery Test from the year 2015/16, which included the new national ratio for communal accommodation. Please note that paragraph 26 of the accompanying note (EXM. 3) sets out that the completions for 2011 to 2015 as 1,371 using the Annual Monitoring Report figures. However, this did not take account of the new national ratios for communal accommodation (student only households and other communal accommodation) in 2015/16 included in the 2018 Housing Delivery Test Measurement. In 2015/16 this increases completions from 383 to 440 in 2015/16. This takes the overall housing completions between 2011-2015 to 1,428 completions.

Scenario 1 – translating Oxford Local Plan housing completions and emerging capacity – based housing requirement to the period 2011 to 2031

2.6 The capacity-based housing requirement between 2016/17 to **2030/31** (~~16~~ **15** years), based on the average annual requirement of 544, would be ~~8,704~~ **8,160** homes. When the 1,428 completions between 2011 and 2015 are added to this, the overall total for the period 2011/12 and **2030/31** would be ~~10,132~~ **9,588** homes. This is summarised in the table below.

	2011-2031 – requirement based approach
Completions 2011-2015	1,428
Requirement 2016/17 to 2030/31 based on average annual requirement of 544	8,704 8,160
Total 2011/12 and 2030/31	10,132 9,588

2.7 We consider this to be the most robust approach to comparing the Housing Growth Deal period to the plan period as it is based on actual completions and the annualised capacity based housing requirement.

Scenario 2 – translating Oxford Local Plan housing completions and anticipated housing supply to the period 2011 to 2031

2.8 An alternative scenario would be to take the anticipated supply from the housing trajectory for 2016/17 to 2030/31 and add this to the completions that occurred between 2011 and 2015. This gives a total supply of ~~11,495~~ **11,142** homes between 2011/12 and 2030/31. This is set out below.

	2011-2031 – anticipated supply approach
Completions 2011-2015	1,428
Actual and anticipated supply 2016-2031 taken from Housing trajectory (EXM.4)*	10,067 9,714
Total 2011/12 and 2030/31	11,495 11,142

*This includes the 10% discount for non-delivery of future anticipated supply (explained at paragraph 3.9 of the draft OLP and Assessing and Meeting Housing Need Background Paper, BGP.3)

2.9 The challenge with this approach is it is based on the anticipated delivery timescales of the housing need in the Plan, which is based on the latest information and applying the NPPF definition of deliverable but can be subject to change over time. This could affect the figures included for the future years to 2031.

Scenario 3 – adding 2011 to 2015 housing completions to the Oxford Local Plan 2036 housing requirement

2.10 If the capacity-based housing requirement for the Local Plan 2016 to 2036 (10,884) was added to the 1,428 completions from 2011-2015 then the total would be 12,312 homes for the period 2011-2036.

	2011-2036 – all supply
Completions 2011-2015	1,428
Anticipated supply 2016-2036 taken from Housing trajectory (EXM.4)*	10,844
Total 2011/12 and 2035/36	12,272 12,312

*This includes the 10% discount for non-delivery of future anticipated supply (explained at paragraph 3.9 of the draft OLP and Assessing and Meeting Housing Need Background Paper, BGP.3)

2.11 The risk with this scenario is the conflation of the Housing and Growth Deal period and the different Local Plan period, which runs 5 years beyond the Housing and Growth Deal period. This therefore includes housing beyond the Deal period.

Relationship to Oxford's unmet housing needs

- 2.12 These scenarios show that the need of 28,000 identified for Oxford in the 2014 Strategic Housing Market Assessment (SHMA) (HOU.3) and embedded in the Oxfordshire Housing and Growth Deal **for the period 2011/12 to 2030/31** is close to being met across Oxfordshire. As set out below the working assumption is that our neighbouring authorities were accommodating 14,300 homes for Oxford's unmet housing needs. Taking the scenarios set out in this answer as a range Oxford's needs being met range between ~~24,432~~ **23,888** and ~~25,795~~ **25,422** between 2011/12 and 2030/31 and up to 26,612 if the period is extended to be 2011/12 to 2035/36.

Figure 2: The apportionment of Oxford's unmet housing need (taken from Oxfordshire Memorandum of Cooperation GDL.13)

District	Apportionment (2011-2031)
Cherwell	4,400
Oxford	550
South Oxfordshire	4,950*
Vale of White Horse	2,200
West Oxfordshire	2,750
Total	14,850
Total excluding Oxford	14,300

*South Oxfordshire did not sign the Memorandum of Cooperation although this figure is now incorporated within the Submission South Oxfordshire Local Plan 2034

- 2.13 As set out in this answer we consider the figures in scenario 1 to be the most robust in terms of comparing the Oxfordshire Housing and Growth Deal to the Oxford Local Plan because it takes our completions between 2011 and 2015 plus the annualised capacity-based housing requirement for the period 2016-2031. The figure of ~~10,132~~ **9,588** is very close to the assumed capacity figure of Oxford of 10,000 and there are not considered to be any implications for planning in the wider Oxfordshire area.