

## Home Builders Federation

### Matter 1

## OXFORD CITY LOCAL PLAN EXAMINATION

### Matter 1: The housing requirement

Whether the circumstances exist in Oxford to justify applying an approach that differs from the standard method of assessing local housing need, and whether it is appropriate to plan for a higher level of need than the standard model suggests.

Whether the evidence base, including the 2018 SHMA Update and the evidence of housing affordability and affordable housing need, support the continued use of 1,400 dwellings per annum (28,000 homes identified in the Growth Deal) as an overall housing requirement (before considering Oxford's capacity).

The Government have established in paragraph 2a-010 of the Planning Practice Guidance the circumstances in which it is appropriate for a Council to plan for a higher level of housing needs. Within this paragraph PPG outlines that one such circumstance is where a deliverable growth strategy has been agreed. Given that Oxford City are part of the Oxfordshire Housing and Growth Deal agreed with to support the delivery of 100,000 homes between 2011 and 2031 it is self-evident that this circumstance alone supports the use of a different approach to assessing need that plans for a higher level of housing need are present. Given that this level of housing need which supports the growth deal has also been found sound at the examinations of the local plans Cherwell, Vale of White Horse and West Oxfordshire would also suggest that the it represents a sound basis against which to plan for housing not only within Oxford but across the HMA. Most recently we would draw the Inspectors' attention to the Inspectors interim note<sup>1</sup> on Cherwell's part 2 local plan which states:

*"All in all, like my colleagues who examined Local Plans in West Oxfordshire, and the Vale of White Horse, I find nothing problematic in the Plan's reliance on the figures produced and agreed through the OGB"*

We would suggest that paragraph 2a-010 of the PPG was written for precisely the situation found in Oxfordshire and as such there can be no question that the level of housing growth agreed between the authorities in the Oxfordshire Growth Board is the level of housing needs that Oxford City Council and its neighbours must plan for. In

<sup>1</sup> <https://www.cherwell.gov.uk/info/83/local-plans/515/local-plan-part-1-partial-review---examination/11>



addition, where need is higher than the standard methodology Councils are required by paragraph 2a-015 of PPG to ensure their approach “*adequately reflects future demographic trends and market signals*”. However, it must also be noted that the Government’s concerns regarding the use of alternative methodologies are primarily focussed on those that result in a lower level of housing delivery. Indeed, paragraph 2a-015 of PPG only applies the test of exceptional circumstances mentioned in paragraph 60 of the NPPF to alternative approaches that result in the in a lower housing need figure than that identified using the standard method. This test is not mentioned in relation to authorities using a methodology resulting in higher housing numbers. Based on the Council’s statements and evidence, in particular that set out in the 2018 SHMA update, we would support the assertion that their approach adequately reflects future demographic trends and market signals as required by PPG.

Mark Behrendt MRTPI  
Planning Manager – Local Plans SE and E