



GERALDEVE

EXAMINATION IN PUBLIC OF

**Oxford Local Plan 2036**

**Hearing Statement in Matter 2: Housing capacity in Oxford**

On behalf of Christ Church Oxford

## Matter 2: Housing capacity in Oxford

**Whether the policies of the Plan adequately promote housing delivery, and whether the Plan provides an adequate basis for ensuring that the best use would be made of land within Oxford to maximise housing provision?**

- 1 Oxford has a chronic unmet housing need. This is evidenced by a range of studies produced by, or undertaken on behalf of the City Council, which have collectively identified a need for between 24,000 and 32,000 new homes over the period 2011 to 2031 to meet the City's growing need for housing (Strategic Housing Market Assessment).
- 2 In recognition of the extreme variance between demand and the ability of the City to meet all of its own housing needs, the Oxfordshire local authorities agreed to work together to address Oxford's unmet housing need through the Oxfordshire Growth Board in recognition of this being a cross-boundary matter. It is important to recognise that the quantum of homes required is substantial, and also that the constituent authorities agreed to work together through the Oxfordshire Growth Board. The Oxfordshire Growth Board comprises the six Oxfordshire authorities: Cherwell District Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council. Non-voting members include OxLEP, the universities, Oxfordshire Clinical Commissioning Group, Homes England and the Environment Agency.
- 3 Oxford remains one of the least affordable locations for living in the United Kingdom, with the average cost of purchasing a home in the City now more than eleven times the average salary of someone working within the City.
- 4 Within the Growth Strategy Key Issues (2016), the City Council recognised that:
  - Recruitment by the city's businesses, universities, hospitals and schools is difficult, because of a lack of housing choice and affordability. This adversely affects our economy, the quality of our services, and the lives of those living and working in the city.
  - Our universities are being held back in the global competition for the best research talent, and outcomes in our public services, such as health and education, are compromised through the lack of available affordable housing for key staff.

- 5 The City Council commissioned studies to identify suitable locations for housing and economic development within the City (the Oxford Housing and Economic Land Availability Assessment (HELAA) – undertaken by AECOM, 2016, and updated in 2019). The City Council also commissioned consultants Turley to embark on a programme to objectively consider the various growth options in and around the City (Investing in Oxford's Future - Oxford Growth Strategy – 2016) in anticipation that the scale of the need could not be met within Oxford City itself.
- 6 The City Council's HELAA (2019 update) identified that there is potential capacity in Oxford to accommodate around 11,721 additional homes within the plan period. This is a material increase from the earlier iterations of the HELAA.
- 7 In recognition of the extreme variance between demand and the ability of the City to meet its own housing needs (through the potential capacity of around 7,500 to 12,000 additional homes within the City), the Oxfordshire local authorities agreed to work together to address Oxford's unmet housing need through the Oxfordshire Growth Board in recognition of this being a cross-boundary matter. It is important to recognise that the quantum of homes required is substantial, and while not all need is capable of being accommodated within the City Council boundaries, the City Council should be doing all it can to promote the best use of sites within the City.
- 8 In a written ministerial statement dated 12th September 2018 (enclosure 1), the Secretary of State for Ministry of Housing, Communities and Local Government confirmed that:

“we recognise the ambitious plans in Oxford to deliver above their housing need in the long term. The Government wants to support this strategic approach to supporting housing delivery through joint working”
- 9 The review of the Local Plan, combined with the ambition within the agreed Growth Deal, indicate that there is a very clear impetus for a step-change in housing delivery in order to support the economic growth of the City and wider County as well as addressing existing shortfalls in provision.
- 10 Despite the clear and urgent housing need, it is nonetheless disappointing that smaller sites have not been considered within the site allocations, as they can provide a material contribution to the delivery of homes within the City in order to assist with addressing the urgent housing shortage.

- 11 We remain concerned that the emerging plan still has not considered sites under 0.25 ha within its site allocations; the decision not to include these smaller sites excludes sites which have the potential to provide many homes over the lifetime of the plan.
- 12 Due to this threshold, sites such as Osney Warehouse and St Thomas School are not considered for allocation even though they are identified as being suitable for housing in the iterations of the Council's own Housing and Economic Land Availability Assessment (HELAA).
- 13 The City Council's 0.25 ha threshold will ultimately lead to many smaller sites being developed as uses that are not as vital as the current pressing need for significant residential development and ought to be reconsidered in the broader circumstances of the unmet housing need within Oxford. Given this, there would be clear justification for considering sites below 0.25ha within the City.

**List of enclosures:**

- 1 Written Statement by the Secretary of State for Ministry of Housing, Communities and Local Government on 12th September 2018

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## Written statements

**WS**      **Ministry of Housing, Communities and Local Government**

Made on: 12 September 2018

Made by: **James Brokenshire** (Secretary of State for Ministry of Housing, Communities and Local Government)

Commons      **HCWS955**

### Housing Land Supply in Oxfordshire

In March this year the Government committed to the Oxfordshire Housing and Growth Deal, to support ambitious plans to deliver 100,000 homes by 2031. The Oxfordshire-wide Joint Statutory Spatial Plan to be adopted by 2021 will be supported by £215 million of funding to help deliver more affordable housing and infrastructure improvements to support sustainable development across the county.

Paragraph 217 of the National Planning Policy Framework sets out that the Government will explore potential planning freedoms and flexibilities, for example where this would facilitate an increase in the amount of housing that can be delivered. Such freedoms and flexibilities are to be considered by the Government on a case by case basis. In this instance the Government has worked closely with the authorities in Oxfordshire to agree planning freedoms and flexibilities that will support the ambitious plan-led approach through a Joint Spatial Strategy and the Housing Deal.

As part of the Housing Deal, Oxfordshire sought flexibility from the National Planning Policy Framework policy on maintaining a 5 year housing land supply. This policy supports the delivery of housing by ensuring sufficient land is coming forward to meet housing need. However, we recognise the ambitious plans in Oxford to deliver above their housing need in the long term. The Government wants to support this strategic approach to supporting housing delivery through joint working. We have therefore agreed to provide a short term flexibility which will support the delivery of the local plans for the area and ensure that the local authorities can focus their efforts on their Joint Spatial Strategy. The Government recognises that in the short term this will result in fewer permissions being granted under paragraph 11 of the National Planning Policy Framework but the Government believes that it is important to support these ambitious plans that will deliver more housing in the longer term.

Having considered the responses from a local consultation, which closed on the 12<sup>th</sup> July 2018, I am today implementing a temporary change to housing land supply policies as they apply in Oxfordshire.

For the purposes of decision-taking under paragraph 11(d), footnote 7 of the National Planning Policy Framework will apply where the authorities in Oxfordshire cannot demonstrate a three year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73). This policy flexibility does not apply to the Housing Delivery Test limb of footnote 7 of the National Planning Policy Framework nor plan making policy in paragraph 67. If a local authority intends to fix their land supply under paragraph 74 they will still be required to demonstrate a minimum of five year supply of deliverable housing sites, with the appropriate buffer.

This statement is a material consideration in planning decisions and applies to those local planning authorities in Oxfordshire with whom the Government has agreed the Oxfordshire Housing and Growth Deal, namely Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council. This statement applies from today and remains in effect until the adoption of the Joint Statutory Spatial Plan in each area, provided the timescales agreed in the Housing and Growth Deal are adhered to. I will monitor progress against these timescales and keep the planning flexibility set out in this statement under review.

This statement has also been made in the House of Lords: **HLWS924**