

## EXAMINATION OF THE OXFORD LOCAL PLAN 2036

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## EXAMINATION STATEMENT ON BEHALF OF DE MERKE ESTATES & M.K DOGAR LTD

*Matter 4 – Housing Delivery*

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November 2019

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*7<sup>th</sup> November 2019*

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*Matter 4 – Housing Delivery*

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### **1.0 Introduction**

- 1.1 This Examination Statement provides a response on behalf of De Merke Estates & M.K.Dogar Ltd, to those Matters and Issues raised by the Inspectors, and specifically relates to the Housing Delivery (Matter 4), in respect of the Oxford Local Plan 2036 and its supporting evidence base.
- 1.2 De Merke Estates & M.K.Dogar Ltd own 17ha of land situated adjacent to the northern side of Oxford City at Old Marston.
- 1.3 The site includes 3.52ha of land that is allocated for housing in the Oxford Local Plan 2036 under Policy SP26 – Hill View Farm. The Council's Housing Trajectory anticipates that a total of 110 dwellings will be delivered from this site during the monitoring years 2024/5 and 2026/7.
- 1.4 The remaining parcel of land (13.5ha) is being promoted as an omission site (HELAA reference number: 112a2), with capacity for a further circa 270-360 dwellings<sup>1</sup>.

### **2.0 Matter 4 – Housing Delivery:**

**Question 1      Whether the housing trajectory and its underlying assumptions and evidence provide a realistic and reliable assessment of the rate of housing delivery?**

- 2.1 No, for the reasons set out in its Reg 19 representations (Chapter 3) and contained within its Written Examination Statement in relation to Matter 1: Housing Requirement, Neame Sutton remains concerned regarding the various sources of supply being relied upon by the Council to maintain delivery of housing throughout the plan period.
- 2.2 In headline terms, these concerns relate to:
  - No compelling evidence to include windfalls within 5 year period as per NPPF 2019;
  - Removal of sites which are not considered to be deliverable in the context of Annex 2 Definition in NPPF 2019;
  - Increased Windfall allowance from 60dpa to 136dpa is not justified; and

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<sup>1</sup> Based on an indicative density range of between 30-40 dpha  
Neame Sutton Limited  
Chartered Town Planners

- Completions data for monitoring years 2016/17 and 2017/18 are incorrect and not supported by evidence.

2.3 Neame Sutton has taken the opportunity to update the housing trajectories previously submitted to reflect the Council's most up to date evidence.

2.4 In this respect a total of 8 trajectories are appended to this Statement at Appendix 1. 4 based on the Council's supply assumptions and 4 based on Neame Sutton's adjustments (set out above at paragraph 2.2), testing a range of housing requirement scenarios:

Table 1	LPA supply	constraint based target of 544dpa
Table 2	LPA supply	standard method target of 749dpa
Table 3	LPA supply	HELAA target of 1,400dpa
Table 4	NS supply	constraint based target of 544dpa
Table 5	NS supply	standard method target of 749dpa
Table 6	NS supply	HELAA target of 1,400dpa
Table 7	LPA supply	stepped trajectory *
Table 8	NS supply	stepped trajectory

\*It is of relevance to note that the figures contained within Table 7 do not mirror the Council's figures set out in PSD.5 as it contains multiple errors. Consequently, Table 7 shows an improved position over that set out by the Council.

2.5 Neame Sutton look forward to having the opportunity of discussing these trajectories with the Inspectors and participants at the forthcoming hearing sessions.

**Question 2 Whether it would be possible to demonstrate a 5 year supply of housing land at the adoption of the plan and a reasonable prospect of a rolling 5 year supply for a foreseeable period thereafter, and whether the use of a stepped trajectory is justified?**

2.6 No, indeed there has been a worsening of 5 year housing land supply based on the Council's updated evidence.

2.7 The comparison table below summarises the outcome of both Neame Suttons and the Councils approach to 5 year housing land supply and is replicated from Neame Sutton's Reg 19 representations (page 14) with those updated figures in *(brackets)*:

Annual Requirement	Council Position - Years	Neame Sutton Position - Years
	01 April 2018. (01 April 2019)	01 April 2018. (01 April 2019)
431 dpa (544dpa)	6.92 (4.01)	3.42 (2.31)
746 dpa (749dpa)	5.71 (2.65)	1.77 (1.55)

- 2.8 Detailed land supply tables are attached at Appendix 2.
- 2.9 In addition to the above, the updated trajectory tables attached at Appendix 1 set out the rolling 5 year housing land supply position across the Plan period and demonstrate that in the majority of cases (Tables 2-6 and 8), the Council are unable to demonstrate a rolling 5 year supply of housing land as the Plan simply fails to delivery sufficient housing land to meet its requirement.
- 2.10 It is clear therefore that in those scenarios the Council needs to allocate more sites.
- 2.11 Furthermore, using the Council's sources of supply, as set out in Table 1, it is evident that the Council is unable to demonstrate a 5 year supply of housing land at the point of adoption of the plan (2020/21) with a 4.9 year supply and shortfall of 299.5 dwellings.
- 2.12 The Council acknowledge this and suggests at paragraph 20 of its Updated Housing Trajectory Note<sup>2</sup> that introducing a stepped trajectory will ensure that a 5 year housing land supply can be demonstrated on adoption of the Plan.
- 2.13 Neame Sutton do not consider this to be a sound or justified approach.
- 2.14 Instead the Council should seek to positively plan for housing delivery in the early years of the plan period by allocating additional sites. The existing allocated site at Hill View Farm, Old Marston has the potential to contribute an additional circa 270-300 dwellings by allocating the promotion site and is a missed opportunity to maximise housing within Oxford..

### **3.0 Conclusion – Areas where amendment to the Plan is being sought:**

3.1 The following changes are required for the Plan to be found sound:

- Removal of windfalls from the first 5 years of the supply if compelling evidence cannot be demonstrated;
- Provision by the Council of clear evidence to meet the Annex 2 deliverable test if current supply sources are to be relied upon for the first 5 years of the Plan period;
- Increased windfall allowance of 136pa removed as not justified and replaced with 60dpa;
- Inclusion of correct completion data for monitoring years 2016/17 and 2017/18;
- Site details relating to 303 dwellings identified as commitments; and
- Allocation of additional sites to meet early years delivery and provide flexibility in overall housing delivery strategy.

3.2 In this respect, and having regard to De Merke Estates & M.K.Dogar previous representations submitted at the Regulation 19 stage, the Council has the necessary evidence to support the allocation of the promotion site in the emerging Oxford Local Plan and that the contribution of an additional circa 270-360 dwellings would make a valuable contribution towards the Council's open market and affordable housing needs.

