

Planning Policy

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Local Plan 2040

Preferred Options Consultation Report

Regulation 18 Part 2
August 2023



Oxford City Council
Local Plan 2040 Preferred Options
(Regulation 18 Part 2)
CONSULTATION REPORT
August 2023

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Introduction

The Oxford Local Plan 2040 will set out how we want the city to look and feel. It will guide new development to the right locations while protecting and improving the environment and people's quality of life. It will help deliver the new homes, businesses, jobs, shops and infrastructure needed to support the growth of Oxford over the next 20 years and it will be used in determining planning applications and to guide investment decisions across the city. The [Consultation Statement Regulation 18 Part 1](#) sets out how Oxford City Council undertook consultation on its Oxford Local Plan 2040 Preferred Options (OLP PO) document between October 3rd, 2022, and November 14th, 2022. Both Regulation 18 consultation stages followed the requirements of Regulation 18 of the Town and County Planning (Local Planning) (England) Regulations 2012. The consultation was also carried out in accordance with the commitments in Oxford City Council's [Statement of Community Involvement in Planning](#), which sets out how we will involve the community in the planning process.

It was made clear in the Part 1 Consultation that a further consultation would be undertaken focussed on housing need. Although housing need was discussed in general terms in the Preferred Options document no figure of need was included. The Oxfordshire Plan 2050 was intended to determine the housing need for Oxfordshire and apportion an amount to each of the districts based on a spatial strategy. It had already been agreed by all the Oxfordshire Local Planning Authorities that the Oxfordshire Growth Needs Assessment (OGNA) originally undertaken in 2019 to inform the Oxfordshire Plan, was out of date and work had commenced jointly on updating this. However, work ceased on the updated OGNA when the Oxfordshire Plan was discontinued in August 2022. This left no time to collect alternative housing need evidence before the PO consultation in autumn 2022.

Instead, further work was commissioned by Oxford City Council and Cherwell District Council to provide the required evidence base. This was called the [Housing and Economic Needs Assessment](#) (HENA). This evidence informed the consultation for the Regulation Part 2 consultation and was published alongside it together with the [Green Belt Assessment of Additional Sites](#).

This Consultation Statement Part 2 is a summary of the comments received from the Housing Numbers (Regulation 18 Part 2) Consultation.

Local Plan Timeline

The details of the Local Plan timeline are set out in the [consultation part 1 report](#). The proposed submission consultation (Regulation 19 document) is to be consulted on in autumn 2023 for six weeks. Following this consultation, the document, the supporting evidence base and comments received will be submitted to the Secretary of State. An independent examination is then carried out. Those who have made comments to the proposed submission document have the right to ask the Inspector to be heard in person at the examination. Following the examination, the Inspector will provide a report. If the plan is found sound, any changes recommended by the Inspector are made and the plan will be taken to Full Council to formally adopt it.

Preferred Options Part 2 Consultation Process

The City Council ran a 6-week [consultation exercise](#) from 13 February – 27 March 2023.

Responses to Consultation Questionnaire

The responses to the consultation received on each of the questions are summarised in the table below with responses from statutory consultees summarised first followed by a summary of all other comments received on each of the questions.

A summary of the comments and number of responses received on the consultation portal are appended to this report as Appendix 1.

We received comments from some statutory and non-statutory consultees who responded with some general comments on the Plan. These comments have been noted and will be considered as part of the wider Plan comments.

Q1 - Are there other ways of identifying housing need that should have been considered?

Summary of comments from statutory consultees:

- Standard method should be used to produce a need figure close to the requirement. City officers should identify more housing sites and increase densities in the updated housing and employment land availability assessment (helaa) and explore increasing the windfall allowance (Oxfordshire County Council – OCC).
- Disagree with the Hena and disappointed about the lack of engagement to discuss other methods of establishing housing need evidence. The exceptional circumstances stating Oxfordshire’s role in the local and national economy should be set out clearly. The need to plan collaboratively to meet the requirement to deliver 100,000 homes as part of Oxon Housing and Growth Deal no longer exists so there is no need to depart from the Standard Method to determine housing need (South Oxfordshire DC and Vale of White Horse DC – SODC and VoWH DC).
- Suggest further discussions needed to reach an agreed position on the level of identified housing need for Oxford, and the extent and apportionment of any need which is unable to be met within the City’s boundaries. Further justification needed as to why the City Council has departed from the Standard Method, the 2021 census does not provide enough reason to do so. 2014 based Standard Method should be used until such a time as the 2021 census is reflected in new household projections (West Oxfordshire District Council - WODC).

Summary of comments:

- A collaborative approach with all Oxfordshire authorities is required.
- The scenarios developed by Cambridge Econometrics are based on the outdated premise of growth, whatever the long-term cost. Scenarios should be developed which consider and protect the well-being of future generations.
- Much of the predicted population growth can be accommodated by increasing the number of people who live in existing buildings and encouraging conversions and extensions to achieve this rather than just relying on building lots of new homes.
- Agreement that methodology needs to take account of the City's economic needs and the pressures that arise from forecast economic growth.
- Methodologies provide a clear basis to establish scale of local housing need that responds to critical local factors. Scenarios provide a clear indication of balance between jobs and homes and identify the extent to which growth in labour demand will be satisfied by labour supply. Scenario metrics also provide a measure of extent to which labour originating outside of county is required to satisfy demand originating within.
- Housing requirement figure should be based on the 2021 Census- adjusted Standard Method calculation – this is the most robust analysis of housing need in the city.
- Unless there are proven 'exceptional circumstances' for not using it, then Standard Method should be applied.
- The council should pause and see what opportunities the government's proposed planning reforms might offer OCC.

Q2 - Do you have any comments on the methodologies used in the HENA?

Summary of comments from statutory consultees:

- We support the methodology used in the HENA and as such the unmet need is likely to have to be provided by neighbouring authorities. (National Highways).
- We support the use of the jointly commissioned HENA (Cherwell DC - CDC).
- Oppose the HENA methodology and choice of scenarios, as well as the wider Oxfordshire geography that the evidence covers without our involvement or consent, and the distinct lack of evidence for Oxford City itself (SODC & VoWH DC).

Summary of comments:

- Fully support economic led projection, any lesser housing target risks frustrating the achievement of this economic potential and the benefits that the research focused sector (life sciences, low-carbon energy, AI) generates.
- Standard Method does not yet reflect demographic data from the 2021 Census, nor does it account for actual economic trends or strategies that reflect the importance of Oxford and Oxfordshire to the regional and national economy. The mid-year population estimates that the Standard Method relies on underestimates what has happened in terms of population growth.
- Methodologies provide a clear basis to establish scale of local housing need that responds to critical local factors. Scenarios provide a clear indication of balance between jobs and homes and identify extent to which growth in labour demand will be satisfied by labour supply. Scenario metrics also provide a measure of the extent to which labour originating outside of county is required to satisfy demand originating within.
- Demographic modelling used fixed ratios instead of dynamic cohort models and as such may have underestimated housing need. Use of earlier age projections that influence household formation and the use of economic activity rates rather than blending data with forecasts from OBR may have impacted on figures. Concern about assumption made on home-working & potential impact it may have on other scenarios.
- The HENA fails to understand the very special demographics (connected with universities, hospitals etc.) which substantially influence housing provision and whose requirements are far more complex than those identified in the very broad realisation in the report. Given that there are so few of these large institutions, it would have been helpful to have sent a survey to them all, asking demographics of staff and students and their future growth plans.
- The core assumption that housing is employment led is false given the large student population in Oxford. Where it is a factor, the demand is not representative, due to many single key workers and temporary residents.
- Key inputs that would reduce the demand for housing are missed in the calculation. Examples include large housing developments such as Barton Park and Land North of Bayswater Brook; new student accommodation associated with Oxford Brookes and all the small householder development that create new dwellings or uplift the number of bedrooms.
- Large, high-density and car-free housing (particularly on brownfield sites) would obviate the need for new family housing and make better use of the land currently in Oxford, reducing its' unmet need.

- Agree that this is an exceptional circumstance that justifies a departure from the Standard Method but evidence of why the higher growth has been recorded is needed. (Is it because of population movement related to COVID or are higher rates of growth experienced in specific parts of Oxfordshire due to new housing/ employment opportunities).
- The Standard Method is the correct method for calculating housing need and there is no justification for arbitrarily adjusting this method for Oxford City. The projection of economic growth in the HENA is unreliable given the over-riding impact of macro-economic factors and it is therefore unreliable for use in forecasting housing need.
- More Census data is becoming available since the report was produced, e.g., details of the student population, therefore it would be preferable to take this into account.
- Assumptions are made that the propensity of the population to form households will increase – it won't happen if we keep building expensive new houses.
- Net migration is assumed to continue at the rate during the last five years. Would prefer to see a more prudent method that bases net migration on the last ten years and allows for tapering off in the second decade of the plan - would reduce it by almost 28%.
- Overall, the relationship between housing development, carbon budget and biodiversity must be recognised in the method used to calculate the required number of homes.
- Housing requirement figure should be based on the 2021 Census- adjusted Standard Method calculation – this is the most robust analysis of housing need in the city. The HENA is flawed in the same way as the OGNA and appears to manipulate housing need upwards.

Q3: Do you have any comments on the scenarios?

Summary of comments from statutory consultees:

- Not helpful to only present as an Oxfordshire figure: it's not an Oxfordshire Plan. Do not agree with the 'census-adjusted SM' - Standard Method is not adjustable. The scenarios are not realistic or justified (SODC & VoWHDC)
- Any scenarios should have been applied to Oxford and Cherwell only, as they have not been agreed with the other Oxfordshire authorities. Do not agree with the adjustment to the SM which results in a 40% uplift of dwellings. The 2014-based approach should be used until government releases relevant 2021 Census data. Any uplift from the economic strategy scenario should be applied only to Oxford City and Cherwell, as they have not been agreed by the other authorities (WODC).

Summary of comments:

- The Economic Development-Led scenario is the only scenario that positively supports the economic growth expected in the City over the plan period and maximises the provision of affordable housing.
- The baseline trend economic method or economic led scenario more closely reflect the reality of housing pressures in the city and are more likely to respond to the economic role of the Oxford economy.
- Concern with the employment led scenarios is the economic uncertainty that currently exists and which could have an impact on the high levels of inward investment in Oxfordshire. The scenarios have demonstrably attempted to tackle this uncertainty, but recent events (such as the collapse of the SVB Bank) were not predicted and could have repercussions in the UK.
- The unprecedented rise of biotech and IT enterprises during the Covid pandemic is most unlikely to be repeated, and the future of financial investment in such companies is insecure to sustain such presumed growth. The projection of future housing need is therefore a gross over-estimate of the most likely actual housing need.
- The rate of housing delivery in the districts and the city is of concern and at the existing pace, the current rate of housing completions are likely to be unmet by the end of the plan periods. Neither of the HENA recommended employment led rate of completions will be possible to achieve unless measures are taken to make delivery more efficient and effective.
- Strongly disagree with the three scenarios resulting in the highest growth rates and consider they should be discounted. The two employment led scenarios would lead to housing need

projections over the next ten years 50% and nearly 100% higher than achieved over the last ten years. The census adjusted scenario, based on preliminary and incomplete data, inflates projections of housing need to over 60% above the household increase 2011-2021.

- The high rates of population growth in these scenarios are unrealistic. They rely on increased rates of household formation which are unlikely given worsening conditions in the jobs market and the current cost-of-living crisis, all of which results in less demand for new homes. These scenarios would also require high rates of net migration into the county over the next 20 years. This is unlikely due to the UK's restrictive immigration policy and free movement from the EU having ceased.
- The scenario based on the standard method includes a very high uplift of over 40% for affordable housing resulting in household growth some 16% above the increase in 2011-2021. Although there are some misgivings about this scenario (particularly as annual monitoring reports from the city council indicate that less than 15% of homes built from 2016-2021 meet the government's definition of affordable), it is consistent with current government policy and is the scenario that should be used.
- Unless there are proven 'exceptional circumstances' for not using it, the Standard Method is the approach which Cambridge Econometrics and Oxford City Council should have taken, to conform with the NPPF and PPG, and until the release of the ONS household projections in 2024, the 2014 Census population data is the correct data base to be used.
- The Standard Method figure of 3,388 is rejected because it is based on inaccurate 2014 based household projections. It is then adjusted by considering limited data from the 2021 Census figures, but there are no exceptional circumstances that exist to justify this approach.
- The 2014 household projections showed fairly rapid growth between 2019-29 but this tails off rapidly between 2029-39. However, the HENA assumes that the second decade will see the same level of growth as the first – just one example of how the HENA inflates figures, thereby grossly exaggerating housing need.
- The Census adjusted Standard Method and the Cambridge Econometrics Baseline scenarios both give very high and similar figures which is not much of a choice. There should be a lower net migration option for example and/or other adjustments to the figures.
- The HENA standard method is unreasonable as the affordability allowance is 15.8% more than the amount of growth we experienced up to the 2021 Census. The Cambridge Econometrics Baseline Trend is even more unreasonable as it is 50.6% more than what was experienced.
- For the employment scenarios, HENA correctly observes that the OGNA estimate is a market signal of housing undersupply and thus should be reduced so that supply and demand are more balanced.

- The CE baseline scenario and 2021 Census Adjusted Housing Need Scenarios are suitable housing need estimates, if the target is c.490,000 workplace workers in 2040 with 2021 Census Scenario (4,271 dpa) preferable, as it delivers the best balance between housing supply and demand. Assuming the above workers target the Economic Led Housing Need Scenario is the only suitable housing need estimate for Oxfordshire.
- Each of the three alternative assessments represent appropriate assessments, which take account of demographic and economic trend- based projections to derive reasonable estimates.
- The selection of the CE baseline trend scenario does not look forward to accommodating the projected growth of the science and technology sectors, which has intrinsic links with the presence of the Universities in the city.

Q4 - Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

Summary of comments from statutory consultees:

- City should not be determining levels of need for other local plans or making decisions on behalf of other councils. Current consultation does not reflect any changes since our previous response. The scenarios are not appropriate or realistic, and disagreeing with the SM is not an exceptional circumstance (SODC & VoWHDC).
- The most appropriate – as per the NPPF – is the standard method. Needs to be fully justified if departing, and any departure should only be applied to Oxford and Cherwell (WODC).

Summary of comments:

- Agree that this is the most appropriate scenario to use (as the fourth scenario is likely to be unachievable when considering environmental and social aspects of The Oxfordshire Vision in tandem with the economy), but a sustainability assessment of the scenario is essential.
- Support City Council’s decision to consider whether circumstances faced by Oxford require an alternative method for assessing housing need and conclude that a higher level of housing is needed. This aligns with PPG as a sound approach where it reflects current and future trends. Consultation document and HENA show acute housing shortfall in housing if only minimum/standard method is applied. Evidence shows underestimation in Oxfordshire's population growth and economic growth aspirations justify a higher housing figure. Economic baseline is less than Census adjusted for Standard Method and respects a ‘realistic expectation for economic development growth.’ But consider some unmet need has already been planned for in neighbouring Local Plans and therefore a higher housing level outside the city including Green Belt releases and focus on sustainable towns should be promoted.

- The suggestion that “the economic development-led scenario represents the highest realistic level of growth” is flawed as it does not take into consideration the special policy requirements for environmental protection and enhancement in Oxford and in the surrounding Districts, which must be a central part of any successful development plan for Oxford.
- It has been noted that one of the reasons for justifying the most appropriate scenario is because of the similarity between the figures calculated in this scenario and that of the Census adjusted Standard Method. However, a similarity between figures calculated on entirely different bases does not give comfort that they are both robust, or provide any justification for using either of the figures.
- Conclusion that Oxon’s housing need should be aligned to CE Baseline Housing Need scenario fails to recognise the more beneficial commuting balance achieved by the 2021 Census Adjusted Housing Need Scenario.
- Council’s preferred scenario fails to provide enough homes to realise the economic growth ambition articulated by the Economic Dev. Employment growth projection.
- HENA identifies uncertainty (macro- economic events and public funding constraints may slow projects down or lead to some not progressing) and the realistic Economic Led employment growth scenario is completely abandoned – this is unnecessarily pessimistic and a disproportionate response. It would have been more prudent to arrive at a housing need estimate between the baseline and growth position – recommend at least 5,000 dwellings per annum, this would support an improved balance between housing supply and demand, retains a modest requirement of 1,000 daily inward commuters in 2040 against baseline demand and would also support some employment growth in excess of the CE baseline projection, without breaching the ceiling target of 9,000 daily inward commuters in 2040.
- Proposed housing needs figure using CE baseline trend scenario represents an uplift to the local housing need figure calculated using the standard method but it would be prudent to sense check the adjusted scenarios and the economic trend data against the latest (population and migration) census data (due to be published in Summer 2023).
- Confusing that Cherwell DC is using Standard Method for calculating Housing need, having received the HENA. City should confirm where each authority stand in relation to the HENA.
- Reasons for discounting the ‘economic development-led’ scenario would benefit from further explanation.
- Assumption other Districts in Oxfordshire will use the same method for calculating housing need, not the case. The economic development-led scenario is flawed since it does not consider environmental protection and enhancement in Oxford & neighbouring districts.

Q5 - Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

Summary of comments from statutory consultees:

- We are not convinced that housing distribution should be based on jobs in different districts. Distribution should reflect the need to promote development patterns that support the Local Transport Connectivity Plan (LTCP). We would like to see where the unmet need for Oxford can be accommodated on the already allocated sites close the city (OCC).
- Attempting to divide Oxfordshire's housing need is beyond the City Council's remit or authority to determine the needs for the whole county or to unilaterally apportion that need. The HENA should only identify need for Oxford, which it fails to do (SODC & VoWHDC).
- HENA should not look at need on an Oxfordshire-wide basis, nor be apportioning need. This is beyond the remit and authority of the City Council and its planning function (WODC).

Summary of comments:

- Current local plans in Oxfordshire have already identified enough sites to meet Oxford's housing need until the mid-2030s. Therefore, the additional unmet need will be for the last four-five years of the new local plan. New sites coming forward in Oxford (although likely to be small), additional capacity from windfall sites and increased density will all result in a new unmet need figure for Oxford and needs to be calculated as part of the HENA.
- The unmet need figure should be lower as it doesn't consider delivery of strategic sites in other districts whose full capacity is not accounted for as some delivery is expected beyond the end of the plan period. Some of these sites have density policies which is lower than appropriate for edge of city sites so policy adjustments to increase density need to be factored into the calculation.
- More housing could be planned for in the city. The housing shortages in Oxford are due in part to the city council's continued promotion of employment growth; this despite the historic imbalance between jobs and economically active residents. Maximising the delivery of housing within Oxford's boundaries could involve promoting the redevelopment of all or part of employment sites for housing and enabling the high-quality conversion of under-used office and retail space for housing.
- Oxford City Council seem be exceeding their remit by seeking to determine the housing needs for the whole county and then apportioning that between the District Councils

- This housing need figure calculated for Oxford is around double than if the Standard Method for calculating housing need was used. There is no explanation of how this need could be delivered in a sustainable way, therefore it is unjustified.
- The housing need distribution to the other districts change depending on which of the three options is used, (2014 based Standard Method, 2021 Employment figures or 2040 Employment Figures) with the 2040 option giving the highest percentage to Oxford (30%). However, when this translates to an actual figure for Oxford, this figure (457) remains unchanged, meaning that Oxford's contribution is the same, no matter which option is picked but differs for all other districts. That means that the total pressure on other districts is the same, it is just spread around differently. Only by reducing the overall total and reducing estimated need in Oxford can the total pressure on other districts be reduced.
- Support proposed distribution of employment and subsequent housing across Oxfordshire authorities.
- Should be assessed through the 2021 Census adjusted Standard Method calculation.
- Other factors, including environmental and infrastructure capacity need to be considered alongside employment led distributions – therefore encourage discussions between Oxon authorities to ensure that the collective housing need identified is met in a way that achieves optimal sustainable arrangement.
- The HENA should not be part of the Local Plan as it impinges on the democratic rights of residents in other parts of the county to make their own decisions.

Q6 - Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

Summary of comments from statutory consultees:

- We don't accept the HENA correctly reflects the scale of affordable housing need to meet future social care needs (OCC).
- The HENA makes a claim about affordable housing need for all other districts, without consultation or engagement with us. This is unreasonable and unjustified (SODC & VoWHDC).
- HENA should report figures only for Oxford and Cherwell (WODC)

Summary of Comments

- Support HENA approach which continues to identify a substantial need for affordable housing both in Oxford and throughout the County.
- Surprising that hospitals, teaching and students are of such little importance that they were not even included, given their very special demographics and needs, whereas the relatively small industrial, lab tech and general office sector are addressed in depth.
- Concerned that there is no housing provision to protect key staff who work in the healthcare sector in Headington and who are forced to commute to work each day.
- Concerned that the proposals do not appear to make sufficient provision for affordable housing within the city. It is a myth that building more houses will see prices fall. Priority should be to provide genuinely and permanently affordable social housing to meet existing need. Table 2.2 should cover social rented housing need as set out in Table 9.11 of the HENA to add clarity.
- There must be a focus on the need for smaller social dwellings, as the definition of affordable at 80% or market value means that these are still unaffordable to the less well off, first-time buyers and average income families.
- Given the increasing number of elderly home-owning residents, the provision of high-density, high-quality apartments could free up under-occupied family homes. Government household projections also indicate this increase, and more attention needs to be focused on this trend when considering plans for new estates.
- Support the housing mix that provides affordable and specialists housing.

- The affordable housing need is high and higher housing requirements maximise affordable housing delivery. Use of 2021 Census adjusted Standard Method calculation is more robust and will result in a higher rate of affordable housing delivery.
- Consideration could be given to research undertaken by DLP which is emerging as an industry standard (utilised in Local Plan examinations and endorsed through appeals). The Older Persons Housing Needs Model considers that the minimum level of future provision should be based on a prevalence rate of 275 units per 1,000 of the population who are 75 years or over, alongside providing tenure specific prevalence rates and older person accommodation needs projections more responsive to local circumstances (https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU_Older_Person_Housing_Need_Research.pdf)
- Student housing – using census data taken during covid lockdown could be unreliable so cross reference with other data sources to ensure there is no under provision of student housing in the future.
- There is no mention of securing increased mooring in the assessment.

Q7 - Do you have any comments about the assessment of housing capacity?

Summary of comments from statutory consultees:

- Support the City Council's commitment to maximising capacity within the city and the need to increase the supply of affordable housing (CDC).
- The updated HELAA should reflect new policies and initiatives. As the County Council referenced in the Nov 2022 response development patterns need to support the Oxfordshire Local Transport and Connectivity Plan and ensure that fewer car journeys are made. Press releases and local actions to deliver affordable housing are positive initiatives in the City, and this momentum could also be reflected in the HELAA. The ambitions for zero carbon should influence the HELAA too with more accessible sites and efficient use of land being promoted. It is therefore concerning to see its unlikely the HELAA will see significant changes to the capacity estimate when new policies are applied. The exceptional circumstances for Green Belt review and release of Green Belt should be clarified. Wolvercote Social Club could be an opportunity to make more efficient use of land. Green Belt base layer map and map extracts are out of date – parcels were released in the South Oxfordshire Local Plan eg Land North of Bayswater Brook (SODC & VoWHDC).
- City must leave no stone unturned and seek to maximise delivery of housing within the city boundaries before looking to adjoining districts to assist with any unmet housing requirement figure. Providing more homes in Oxford will have the most benefit for people who want to live and work in Oxford, it is where the best transport connections are and encourages the maximum use of previously developed land in preference to sensitive, undeveloped greenfield sites, including those within the Oxford Green Belt (WODC).

Summary of Comments

- Density should be looked in more detail. A lot could be gained by incrementally increasing average residential densities (not tower blocks!) which would increase housing capacity.
- Sites in the city should be prioritised for social rent housing rather than employment. The proposed Oxpens development will deliver 3,000 new jobs but only a few hundred homes.
- Dispute the projections for office floorspace that will be needed. If the tendency to work at home (37.9% in the 2021 Census, not the 30% mentioned in the HENA) continues and maybe even grows, then need for office workspace in Oxford could reduce and free up space for housing. Similarly, retail floorspace need seems to have reduced as more goods are delivered direct to customers.
- The City Council will need to work with neighbours through duty to cooperate to distribute housing or else the economic aspirations of the area will not be achieved.
- City Council should not limit itself to GB review when revisiting HELAA. GB release is only one of several potential sources that need to be fully assessed. Opportunities to review land already excluded from the GB should also be investigated, as reinforced by proposed Central Gov's reforms to planning system (which indicates urban areas provide most sustainable locations for growth and development opportunities). A comprehensive Green Belt review undertaken under the auspices of the Future Oxfordshire Partnership Strategic Planning Advisory Panel is recommended. Comprehensive review will need a joint approach with all DC's. The GB Assessment of Additional Sites – falls short of a comprehensive review of the GB around Oxford because land outside administrative boundary is excluded.
- Urge Oxford City Council and its neighbours to address cross boundary matters pro-actively and constructively. Would be useful to understand what discussions and buy in the City Council has had on the HENA with other authorities.
- Operational sites and campuses should be dedicated to meeting the teaching, research and innovation needs of the Universities. Identifying residential targets on university sites will detract from the teaching and research missions of the Universities. Balance of housing provision v teaching and research space must be at discretion of University, rather than other policy objectives. Key operational sites should be protected for (intensified) academic teaching and research uses.
- Address housing capacity through using empty homes and retail units.
- Land available as vacant on industrial sites should be allocated for high density low-cost homes.

Q8 - Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?

Summary of comments from statutory consultees:

- Support the City Council's commitment to work closely with neighbouring authorities to continue to refine proposals for respective local plans (CDC).
- Ideally evidence should be jointly commissioned by all the Oxfordshire authorities so agreement could be reached, and we can be confident that the figure of unmet need is realistic and achievable and agreed with district councils (OCC).
- Should use Standard Method to calculate housing need. In the absence of exceptional circumstances should not use the economic baseline scenario by Cambridge Econometrics. The approach also does not assess the need for Oxford City. Concerned about the low capacity in the interim HELAA, the inflated housing need, and the resultant gap between housing need and capacity is greater than it should be. Clarify any windfall assumptions. Clarify the rationale for a stepped trajectory if applied (SODC & VoWHDC).
- Going above the standard method in terms of housing delivery may have potentially harmful impacts on the environment and Oxford's heritage. But acknowledge constraints and importance of working with neighbouring authorities to help meet Oxford's housing need. Keen to see historic interest given due consideration in seeking to meet housing capacity target (Historic England).

Summary of comments:

- Circumstances faced by Oxford & Oxfordshire remain the same, acute shortage of housing to meet economic aspirations of city and county, scenarios considered therefore to be reasonable and supported. Support approach to meet the needs of those in high need & those, particularly the young, who may struggle to remain in the city.
- Welcomes statement by the City that 'the delivery of housing is a priority' and its commitment to 'work closely' with neighbouring authorities so that housing needs of Oxford can be met in full. But consider actual need for housing could be even higher.
- This assessment impacts the whole county, and it is unclear as to what extent district councils have been involved in the drafting. Council to pursue active and constructive engagement with its neighboring authorities on provision of identified housing needs across the Oxfordshire Housing Market Area (HMA) and publish evidence of this engagement at the earliest opportunity.

- Housing need should not be based on a projected economic growth in response to an outdated Cambridge led study which ignores the Green Belt, NPPF, climate change awareness and an economic reality post-Brexit.
- The HENA fails to provide a detailed analysis or separate section on Oxford, the main target of the report. The Growth Board required 650 homes p a to be provided in Oxford's administrative boundary between 2011-2031. This has been reduced to 457 home per annum and is not explained clearly in the HENA.
- Almost meaningless to analyse historical housing trends as this is influenced by cost and availability of housing – analysis of past trends is not a predictor of future need.
- The HENA needs to be publicly discussed and reviewed for consistency with climate change / environmental and social / inclusivity priorities and for consistency with the Oxfordshire Vision overall.
- Move away from an old-fashioned pursuit of GDP 'growth' to the more socially and environmentally aware 'doughnut economics', which aims to ensure that no one lacks life's essentials, and that development does not compromise the planet's ability to support life.
- There is no Sustainability Appraisal of the environmental, social or cultural impacts of these proposals, or even acknowledgement of such impacts.
- As recently as 2018, the objectively assessed need for Oxford City was 93 dwellings per annum, with any figure above this being a 'policy choice'. This consultation fails to make clear what has changed so dramatically since 2018 and fails to distinguish adequately between 'need' and 'requirement'.
- The CE figures are automatically presented as the housing 'requirement' but there has been no balancing exercise undertaken to assess the environmental and social impacts of this approach.
- Ox City is facing a growing housing and employment need. Need to plan for both future housing and employment needs.
- The assumption that households rent because they cannot afford to buy is tenuous at best when so many are in temporary residence.
- Housing need is understated, should be higher than the HENA recommended scenerio - at least 5000 dwellings per annum.
- HELAA Table B capacity info does not align with the interim assessment of capacity suggested within the PO documents; therefore it would be useful for greater clarity on the deliverable sites in future iterations. Also, be helpful if the council could publish info relating to how the

unmet need of City will be delivered, the role of the council in determining and identifying sites to meet this need and how the relationship to the city will be considered.

- Local plans which sought to meet Oxford's unmet need have an end date of 2031/2 - Further work needed to ensure period to 2040 is addressed as well as any under-provision arising from the period to 2031.

Appendix 1 Summary of Responses to Consultation Questionnaire on Portal

Q1 - Are there other ways of identifying housing need that should have been considered?

Number of comments received on the portal - 105

Summary

- Meet only the genuine need for affordable housing rather than providing market housing.
- Use the Standard Method and apply the calculations only to the city itself, rather than Oxfordshire as a whole, adjust for falls in birth rate and life expectancy changes since 2014
- The assessment should not make assumptions based on the actions and policies of other authorities.
- ONS estimates a UK population increase of less than 5% for Oxfordshire so there are other ways of estimating need which differ hugely.
- Wait for the ONS projections to come out in 2024 and base them on that.
- Housing needs vary but can be characterised by the degree and amount of 'external' intervention to make them viable. All this has implications for what kind of housing is best for each category and its location.
- The housing need should be the need of people who already live here and key workers who work here, not the need that the council plans to create with their business growth agenda. An alternative assessment based on lower economic growth should be provided.
- New opportunities for commuting due to the expansion of railway lines will reduce housing need in Oxford.
- Allow the market to determine what to build, how much and where.
- The council should consider the lack of housing built in the past 20+years and add that onto the current targets.
- The 2018 SHMA stated that actual need was 93 dwellings per annum (dpa) but an updated figure appears to be missing in this document.
- The current level of under-occupation of existing dwellings should be considered.
- A precautionary approach should be taken due to the uncertain impact of shock events such as Brexit and financial crises.
- Housing need should be assessed in the context of a successful 'levelling-up' of other parts of the country.
- Looking at the housing waiting list to see who is in housing need and the cause of the need and the number of and geographic location of empty housing units across the city.
- Housing needs arising from new jobs/new companies in Oxford should consider increased patterns of hybrid and virtual working.
- Explore an alternative methodology lower than the Standard Method, based on meeting only the genuine need for affordable housing rather than top-loading with market housing.
- Given the constrained nature of the city there would be justification for a lower figure that focused purely on addressing actual need which the city identifies as 740 dwellings per annum.

- An assessment based on low internal migration, levelling-up and the reskilling of existing residents.
- The model of employment growth should be split into two sectors of employment – the international ‘knowledge’ sector driven by the universities, and the secondary ‘dependent’ economy which services the city’s needs.
- Carbon Budgets should be considered and need should be balanced against scope 1, 2 and 3 carbon emissions from construction and occupancy.
- An increase in moorings and the amount of people living on houseboats should be considered in the assessment.
- People should have been asked what they want, and street consultations undertaken.

Q2 - Do you have any comments on the methodologies used in the HENA?

Number of comments received on the portal - 89

Summary

- The Standard Methodology is preferred option, it already includes a substantial allowance of 218 dpa to reflect affordability concerns - a lower figure that reflects the constraints in Oxford City would be more sustainable. Note that this method's 2014-based household projections were previously criticised for being high.
- Census-adjusted Standard Method - On what basis is the upward adjustment of +39.3% to the Standard Method for Oxfordshire made? The 2021 Census for Oxford City shows population and households to be lower than the 2014-based projections by 2.6% and 11.1% respectively - any adjustment for the City should be downwards. Such manipulations of the 2014-based projections are neither justified nor acceptable.
- Population figures are not the same as household projection figures – the census indicated a fall in household numbers from 2011. New census data has become available since the publication of the report – e.g. student population and should be considered.
- Table 3.9 shows the 2014 SHMA – SNPP inflates the 2011 census data by approximately 1,000 and underestimates the 2021 census data by 3.6%.
- The high level of economic growth is by no means likely to happen and has a high environmental impact.
- Table 4.4 shows a difference of 4% between the ONS predictions for '21 and the actual '21 census data. This is not a significant difference. It is also not very different from the 2014 SHMA projections [2014 SNPP] of 3%. There is no data or analysis on the 2018 SHMA that could have been for the current Local Plan and how using these figures compare with those in the previous Plan.
- The alternative methods produced by Cambridge Econometrics (CE) are not more valid than the standard method. The CE baseline is inflated, to over 50% more than the growth seen over the last 10 years. This trajectory would expect to see Oxfordshire’s population growing by nearly 27% by 2040, compared to ONS estimates of a UK population increase of less than 5%. This is not deliverable or sustainable.

- CE also came up with the Oxfordshire Growth Needs Assessment (OGNA) which had similar flaws. The independent review by Opinion Research Services Ltd (ORS) of the OGNA found that it was not fit for purpose.
- The council's assessment of the High Economically Led Growth Scenario is that: "there are potential downside risks to economic growth Given the current economic uncertainties, this scenario is not considered to be the most appropriate housing need scenario".
- A high-economic development scenario commits the city to unsustainable overdevelopment (especially in relation to traffic, water, sewage). And is fundamentally incompatible with a more biodiverse, low carbon and more equal city and surrounding areas.
- Please pursue the transformational / Economic Development Led scenario, Oxford is horrifically unaffordable and the problem is only getting worse. Building significantly more houses compared to our current (lacklustre) rates is the only way of solving this.
- These seem to support a plan for industrial development raised by the universities and certain forms of business (research based medicine etc) and not the people of Oxford. Skilled employees will be found from outside Oxford.
- Lack of adequate analysis of the embodied and operational carbon emissions implied by the intended growth levels.
- What would the impact be on the levelling up agenda?

Q3 - Do you have any other comments on the Scenarios?

Number of comments received on the portal - 81

Summary

- Overall, the approach behind the HENA assessment appears manipulated towards higher growth figures.
For example:
 - a) ONS 2014 Household projections for Oxfordshire taper off fairly rapidly from 37,301 in 2019-29 to 21,834 in 2029-39 ie 41% lower in the second decade. But the HENA assumes that the second decade will see the same growth as the first, which adds 26% to the figures.
 - b) The HENA averages net migration over five years up to 2020 and carries this forward. A 10 year average would be more appropriate, especially when forecasting two decades ahead. This would reduce the annual net migration figure from 2,752 per annum (HENA Table 3.11) to 2,287 per annum, a drop of 17%.
- The departure from the Standard Method is fundamentally flawed, because it creates no consequences to uninhibited growth.
- There should be a scenario included that assumes a desire to limit population growth in Oxfordshire.
- An affordable housing Scenario should have been included. Effectively stating "Oxford has so little affordable housing that addressing it would require building more houses than our most extensive growth projections" should not be an excuse for failing to address unmet affordable housing needs.
- The scenarios are unnecessary, just let people and businesses build whatever they want.
- Previous projections by CE have already been shown to be over-optimistic and this would assume carrying on recent high rates of growth consistently over the next 20 years. It would put immense pressure on our local environment and infrastructure and would also undermine the Levelling Up

agenda as it is not based on providing jobs for existing residents but on creating new jobs to attract people in from elsewhere.

- The priority should be the provision of social housing (for rent or purchase) to meet existing need, not seeking to generate additional need.
- Until analyses of the latest census results are available, any change from the current Standard Methodology is based on speculation - what drives this? It has the appearance of being motivated by economic aspirations rather than overall wellbeing of the population.
- The Scenarios cannot be considered valid unless local constraints are addressed, including the carbon budget, biodiversity, the need for less expensive, smaller houses, and the ability to encourage greater occupancy of existing buildings and residential areas. Other constraints such as the transport network, water supply and sewage treatment cannot be ignored.
- The Cambridge Economics' method seems to be to increase the numbers to fulfil the ambitions of the City and University to grow in size and deliver GDP measured growth with no regard to the wellbeing of the present population and future generations and ignoring the constraints of our environment. This approach is out-dated and the Climate Emergency demands a different approach based on balancing growth against wellbeing and sustainability.
- The High Economic Development Led Scenario is not appropriate.
- They are out of line with ONS predictions. A 29% increase in the Oxon population by 2040 is over 5 times greater than national predictions.
- The final employment scenario, based on a 'go-for-growth' approach will not benefit people living in Oxford.
- Expanding Oxford's business and commercial profile will place undue strain on an already overstretched infrastructure, this could be ameliorated by an assumption of very low growth.
- There seems to be a presumption that excessive growth rates are a foregone conclusion, and a more rational assessment has not been given the time of day.
- The proposed scenarios build in a spiralling increase in housing need.
- There is too great a drive towards economic growth and no apparent realisation that other parts of the economy, such as BMW Mini, are quite likely to decline or cease to exist, which will lessen the need for more housing and potentially release more brownfield options for development.

Q4 - Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

Number of comments received on the portal - 75

Summary

- The estimates are far too high and the process seems to have arrived at a predetermined answer.
- The reasoning appears to be based on a fishing exercise to justify decisions about prioritising inner city land (disproportionately owned by the University) for employment, knowing full well that this will accentuate pressures on less sustainable locations at the fringes of the City and in neighbouring Districts for the housing demand that delivery of such employment will generate.
- I reject as irrational the conclusion in paragraph 2.15 that either the Census-adjusted Standard Method or the CE Baseline Trends forecast could be selected as an appropriate scenario. The justification is false and conclusion illogical that the robustness of these scenarios is demonstrated by their similarity.
- The reasoning of the council is over optimistic and indeed the assumption needs not only to be challenged but to be modified.

- A level of pragmatism is required as to what is actually deliverable. The Oxfordshire Housing & Growth Deal set a target of 5,000 dwellings per annum (dpa) across the county. In the period since 2011, the average delivery has been only 3,865 dpa. For Oxford, average delivery is only 288dpa against a target of 550 dpa. Given the current economic outlook, it seems highly unlikely that there will be much change in this situation in the foreseeable future.
- You are trying to impose a planning framework based on the statement, "the economic development-led scenario represents the highest realistic level of growth".
- Apparently no thought has been given to environmental and societal effects or to the levelling up agenda.
- What is the associated carbon budget, both embedded and ongoing, for this level of growth
- It is vital that the scenario used should take account of the urgent need for mitigation of the climate emergency and endangered biodiversity.
- The Levelling Up agenda is ignored throughout the HENA but requires serious consideration. The CE-baseline model is based on Oxfordshire's population increasing by nearly 27% by 2040. This compares to ONS estimates for UK population increase of less than 5%. Therefore, Oxfordshire could only achieve this level of growth at the expense of significant in-migration from elsewhere in the country.
- "Economic need" as a driver for the most appropriate housing scenario allows Oxford to dictate the housing needs of the county, by using its definition of "economic need".
- It is time the councils of the area started to push back on economic designs on the region rather than just accept, via a methodology, that these must happen.
- It has failed to address the changes in the Levelling-Up and Regeneration Bill going through Parliament at the moment which removes the 'duty to co-operate' and further protects the Green Belt.

Q5 - Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

Number of comments received on the portal - 81

Summary

- Build within the city boundary and don't rely on the neighbouring districts. Support numbers that the city can achieve.
- Aim for a round number to aim for.
- Building in Iffley will change the character of the area and affect the greenbelt.
- Use brownfield sites more effectively.
- Stick to a minimal growth agenda like other councils.
- True local housing need has been inflated. Oxford 'need' has been influenced by London land grabbers.
- OCC shouldn't dictate local authorities' plans.
- Using the Standard Method base would reduce Oxford's share to 22.5%.
- You have inflated the figure to 1322 on the basis of scenario-led methodology. That figure is 73 percent more than the 762 delivered by the Standard Method. How can any planning inspector consider such a vast increase in housing need above the Standard Method reasonable or justified? He/she would not.

- There are other policy choices you could make such as increasing density including building upward and / or the St Ives approach to restrict sales of houses to locals only.
- Oxford city should focus on its own needs, and should plan for a more sustainable future, not high levels of economic growth.
- Has this allocation of housing been fully discussed and agreed with the surrounding districts? Surely Oxford City Council only has a remit to assess the City itself and not dump extra housing requirement on everywhere around.
- The City should make an assessment of the housing needs that could be met through prioritising the use of existing buildings through (green) retrofitting and subdivisions, before indicating what level of unmet need should be met by the surrounding districts. They in turn will need to largely meet the assessed need through retrofitting and sub-divisions address the level of under-occupation.
- For houses built in the neighbouring districts, please prioritise building them as close to Oxford as possible and/ or to transport hubs.
- Oxford City Council should not be promoting business growth in the city if the housing and services cannot be provided in the City without destroying what is already good about Oxford, in particular its green spaces.

Q6 - Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

Number of comments received on the portal - 94

Summary

- Housing needs should include schools and nurseries.
- Flat towers should be the solution. Need more affordable housing which is actually affordable.
- Again, let the market build what they think is needed and this will be correct. There should be greater allowance for self builds and community led affordable housing projects. Let people decide and be part of the building process.
- More affordable housing should not exist, some housing needs to be socially rented.
- The mix of affordable and specialist housing should not be placed as a burden in full to the developer. It is common knowledge that this is exploited by service personnel who live in rented and then seek to purchase affordable housing only to sell it on at a later date. This needs to be stopped as it is pushing those who really need affordable housing into a unaffordable situation.
- Oxford City isn't affordable for the majority and we don't need a complex algorithm to demonstrate that. If Oxford City increased its build out rate, then that like other areas, might bring down the cost of housing in Oxford.
- It is unreasonable and not justified to attempt to produce the specialist need evidence base for other local plans.
- The housing mix assumes the current profile of housing. It would be better to include an additional scenario involving an effort to improve affordable housing.
- The obvious priority is to use brownfield sites to provide not expansion but affordable housing.
- Housing should meet the pressing need for affordable homes for local residents and key workers.
- There is not nearly enough lower cost housing, especially for young people who are trying to afford their own homes.

- These people are necessary and should not have to live outside the city and commute in and out.
- I could not find a clear explanation of how the city council will achieve any affordable or social housing for itself whether the housing need figure is 762 or 1322.
- The current practice of building market homes may help to swell council funds but does not directly help those people, particularly key workers, who struggle to find accommodation in Oxford.
- The housing requirement must be focussed on the need for smaller social dwellings.
- More housing for elderly, disabled, travellers all good. But what about self-employed outside knowledge/tech industries? There is emphasis in local plan on disadvantaged groups (rightly so), but there appears to be a belief that increasing computer skills/education is the (only) solution. I would assert that there are many who would prefer or be better suited to practical small-scale work (e.g. bicycle maintenance, odd-jobs, home maintenance, 'creative' industries) who need workshop space. Housing including such space would offer employment opportunities and contribute to an areas diversity and ensure access to local needs (a positive for the 15-minute community if you can get your bike mended locally or a new bookcase made down the street).
- The hospitals should provide affordable housing for nursing staff within a mile radius and also a 24 hour minibus service to bring them in to work and take them home. Nurses should never be expected to pay for parking at work, particularly since some of them commute in from as far as Berinsfield, at night. Teachers in Oxford schools can no longer afford to live in the city, yet the Council is creating thousands more jobs to aggravate the problem.
- Value key workers not growth.
- Tenure types and housing mix should not be decided on the basis of profitability. The Council has a responsibility to address the housing crisis in the City, and where that creates conflict with budget management, the social requirements should outweigh the financial. There is a major problem with divesting delivery to 'wholly owned subsidiary' companies who seek to act as if they are private sector firms, including when it comes to financial management. The slippage towards OCC operating as just another developer (albeit one with special privileges) needs to be guarded against.
- The only way to meet housing needs is through a better balance of the size of houses/flats and households. It is not possible to build new housing and associated infrastructure within carbon budgets and the scale of under-occupation is resulting in unsustainable levels of operational emissions heating (and ventilating) space and fabric not meeting housing needs. In these circumstances the only new building that can be proposed would be one or two bedroomed targeting households looking or prepared to downsize and release space to larger houses or allow for further sub-divisions.
- Sub-divisions and small new units are more affordable than larger (and under-occupied housing), and easier to heat and insulate. Ideally most if not all new housing will be provided by the social rental sector to target and prioritise housing needs.
 - * Past failures of LPAS to concentrate on smaller houses and to accept arguments about demand for larger units has resulted in instant under-occupation.
- As regards sites on the Marston Road, more weight should be given to the need for housing for hospital staff and other key workers, with any 'affordable' element being specifically designated for those groups. This is particularly the case with Oxford Brookes Marston Road Campus (HELAA ref 429, SP 50), which is only half a mile from the John Radcliffe Hospital (12-minute walk or bus from Marston Rd).

From OLP2040 Site assessment proforma (including Sustainability Appraisal) for this site:
"Can access for vehicles be achieved?"

Yes from north and south of site. However, roads offer limited capacity into site (narrow and fairly quiet) - UD assessment suggests site may be more suitable for car free development that would not put additional pressure on surrounding connections".

- Limited capacity into site" - certainly as regards Jack Straw's Lane, which is narrow but not "fairly quiet" at peak times, as it is a popular route from Marston Road to the John Radcliffe Hospital, which is used by a large number of cyclists and pedestrians, as well as vehicular traffic. A car-free development providing key-worker housing would be perfect here. An increase in vehicular movements into and out of the site from the Harberton Mead site would also be hazardous.

Q7 - Do you have any comments about the assessment of housing capacity?

Number of comments received on the portal - 86

Summary

- Assumes population growth well above UK forecasts.
- There is no mention of brownfield development, or of targeted policies for improving housing density within Oxford.
- The creation of an estimated 13,250 jobs but only 1,214 homes is completely unbalanced
- HENA need to develop an Environmentally Sustainable Method for calculating housing need.
- Research by CPRE shows that the city is currently squandering opportunities to develop housing on large-scale city centre brownfield sites.
- The four key urban sites within the City, estimated figures suggest the creation of 14,015 jobs but only 714 homes. 1 The new jobs increase and export housing need to unsuitable greenfield / Green Belt and rural sites away from the City. 2. The brownfield sites should instead be used to meet current affordable housing need.
- An enormous amount of land within the city is used very inefficiently.
- Far too many houses in Oxford have been turned into multiple occupation.
- Stop building new offices and workplaces. Stop the growth of both the universities.
- How much infrastructure needs to be put in place before development starts?
- The City should not be afraid to consider compulsory purchase options.
- The whole idea of 15 minute neighbourhoods requires a much more mixed pattern of development.
- Since growth of internet shopping, & especially since pandemic, high street shopping's declined; w/many businesses having relocated physically &/or on web. So within Oxford, there's potential for much, extra accommodation of its key workers.
- There are also empty/redundant clusters of garages throughout the City which could be repurposed. Sites such as these should be brought into development, if necessary through compulsory purchase. All available should be prioritised for homes and not permitted to be used for further student housing, which should be entirely accommodated on the existing footprint of the Universities [including the Colleges].
You should use the Standard method
- Table 1.5 looks at three sites that could be considered for removal from the Green Belt. Site 153-a Wildlife corridor alongside the Cherwell. Site 118 Land to the rear of Wolvercote Social Club. Site 159 Wildlife corridor adjacent to Duke's Meadow. All three sites have areas of deciduous

woodland, which is identified as a priority habitat. These corridors could make a valuable contribution to habitat connectivity and support emerging policy for Biodiversity Net Gain and the delivery of Local Nature Recovery Strategies. We would further recommend a site survey of these sites to record any ancient, veteran and notable trees on the Ancient Tree Inventory.

- There are major City development sites that should be used to meet our real need for housing but are being developed for creation of many thousands of new jobs and very little housing. This is all wrong. Those jobs are increasing pressure on housing and exacerbating the problem.
- As to getting significant extra housing, the most carbon friendly option is to build where there is currently good services and employment- within the ring road, near to the main radial roads. The radical solution, maybe for when there is a change in national planning and housing policy, is to convert low density 1930s to 1980s housing areas to higher density mid height housing along the main roads.

Q8 - Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?

Number of comments received on the portal - 95

Summary

- All the building of new homes in and around Oxford has not reduced the cost of housing in Oxford. We need to find another way of reducing house prices rather than just building more homes.
- The time will soon come when large areas of inter war housing needs to be reimagined. Lets bring this closer to the agenda and start using the land and energy efficiently. Its time to look beyond what is known.
- The housing need for Oxford City should be only for Oxford City and not the whole of Oxfordshire.
- Oxford doesn't need to grow. Focus on northern cities and communities.
- There's plenty of sites around Oxford to develop and build an equitable, affordable city but at the moment vested interests and the council are not thinking radically enough to accomplish this.
- The proposed level of growth is unsustainable and should be reconsidered, with more balanced provision and more meaningful consultation with neighbouring district councils, residents, community and interest groups.
- What's the planning argument for going above the standard method?
- The projected housing requirement, based on work done by Cambridge Econometrics (CE), expects Oxfordshire's population to grow by nearly 27% by 2040, compared to ONS estimates of a UK population increase of less than 5%. This assumes that recent high growth rates would continue over the next 20 years. This puts too much pressure on the local infrastructure and the environment. The additional high-tech jobs would draw people in from outside Oxford and put further pressure on house prices. Priority should be given to providing affordable social housing to meet existing need, not seeking to generate additional need. There is scope to locate University spin-off technology elsewhere in Oxfordshire along the A43 or M40 corridors.
- The government projection for population growth till 2040 are 5%. To bump up this figure for Oxfordshire to 27% cannot be justified.

- Plan for sustainable and inclusive development and in accordance with the Oxfordshire Strategic Vision.
- There is a lack of any exceptional circumstances to deviate from the Standard Method. There is a Duty to Cooperate to engage on strategic matters that cross administrative boundaries, but the City Council is failing to demonstrate the Duty to Cooperate. Undertaking and publishing disputed evidence on housing need and specialist and affordable housing need for neighbouring districts without any engagement does not demonstrate effective and on-going joint working. It will be impossible for the City Council to document how such important strategic matters have been addressed and progressed in a cooperative manner.
- Oxford North land should have been used for 100% social housing with schools, training college, facilities for a good life. We don't need more jobs in Oxford.
- Delivering affordable housing in Oxford is a priority and delivery of housing should be maximised as far as possible within other constraints. It is not clear from the supporting document how that will be put into effect and how it will be balanced with development for employment. Currently, despite similar statements about the urgent need for housing in Oxford, several recent and proposed large development sites in or near the city centre and districts centres have a low proportion of housing.
- We recognise that the City Council is committed to trying to find affordable housing solutions for its residents and to supporting the world-class education and research offered by our universities. However, this must not come at the expense of Oxfordshire's environment, which in fact underpins the health and wellbeing of both residents and the economy.
- The National Planning Policy Framework [NPPF] says the 'Standard Method' for calculating housing need should be used. No exceptional circumstances exist or are put forward as to why any other method should be used. According to CPRE this Local Plan intends to generate only 714 homes, but 14,015 jobs. This zoning of land for employment has increased the price of housing land within Oxford and made houses more unaffordable.
- Employment - The City refuses to allow housing to be built on land that has been used for employment. To fit in with the "15 Minute neighbourhoods" envisaged in the Oxfordshire Transport Strategy this must change. Plans for the Osney Industrial Estate do allow for student and other accommodation to be included with commercial and university buildings. This should be extended to all other redevelopments. Allowing two floors of flats above all new commercial and retail buildings would produce many thousands of units and encourage redevelopment of the less intensively used land available.
- We ask the City Council needs to re-consider its chosen trajectory, and to take further advice on future housing need from a range of sources in order to arrive at a sensible figure. based on ALL the available evidence. And it needs to work with - not against - the neighbouring councils to identify a more sustainable long-term approach. We can't keep covering our green spaces with asphalt, concrete and bricks. Green spaces, once gone, are gone forever. And once gone they can no longer support climate mitigation, biodiversity and nature recovery, decrease flood risk, help with local sustainable food production, and improve the wellbeing of residents.

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