

Policy and Programmes

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Dear Oxford City Council,

Introductory Response

South Oxfordshire District Council welcomes the opportunity to comment on the Regulation 18 stage consultation on the Oxford Local Plan Housing Need¹. We have read the Consultation Document, the HENA with its appendices, and the new Green Belt assessment of additional sites to inform our feedback. Our responses should be read alongside our submissions to the previous Regulation 18 consultation on the Preferred Options in November 2022. Our responses are directed towards answering the specific questions raised, and we aim to set out our responses with references to each paragraph of the consultation document in the order that they appear.

Question 1 - Are there other ways of identifying housing need that should have been considered?

We are disappointed that our response to your preferred options consultation from 18 November 2022² hasn't resulted in a change to the way housing need is considered. We responded to the consultation stating that Oxford City Council cannot determine housing need for the other authorities in Oxfordshire, we asked that you restrict exploration of exceptional circumstances to Oxford City and confirmed that we remained open to engage on methodology. This latest consultation continues to try to justify a housing need above the standard method. It has also published unsubstantiated housing need evidence for other areas in Oxfordshire using consultants and methodologies that are known to be a point of discord, and without any offers of engagement.

¹https://www.oxford.gov.uk/downloads/file/8354/housing_need_consultation_regulation_18_part_2_document

² <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2022/11/South-response-letter-to-Oxford-Local-Plan-FINAL.pdf>

Your Housing Need Consultation document provides an introduction with a few paragraphs of context. Within the introduction, paragraph 1.3 states:

“Housing need for each Oxfordshire authority was to be set by the Oxfordshire Plan.”

This statement doesn't represent the Oxfordshire Plan Regulation 18 Part 2 consultation correctly. The intention was for the Oxfordshire Growth Needs Assessment (OGNA) to provide an evidence base to establish the housing need. Following this the Oxfordshire Plan would try to establish district/city housing requirements. Paragraph 430 of the Oxfordshire Plan Regulation 18 Part 2³ explained this clearly:

“In planning for housing, the terms ‘need’, and ‘requirement’ have specific meanings. The Oxfordshire Growth Needs Assessment (OGNA) assesses the growth needs for Oxfordshire to 2050 to identify the range of what might be reasonable levels of growth to test through the Plan. It will then be for the Plan-making process to arrive at a growth requirement figure for the Plan policies.”
(emphasis added)

Your Housing Need consultation document discusses some unsubstantiated exceptional circumstances for departing from the standard method at an early section between paragraphs 2.2 to 2.4. Later the consultation document attempts to add another unsubstantiated exceptional circumstance in passing at paragraph 2.15. Why don't you set out all the claimed exceptional circumstances in a clear way within the early section of the consultation document?

At paragraph 2.4, the only claimed exceptional circumstance described reads like a disagreement you have with the Standard Method calculation itself, specifically the use of the 2014 population projections rather than the 2021 Census. This is the only mention of a potential exceptional circumstance in this section. It is interesting that this is a different explanation for potential exceptional circumstances than the ones that were made in the Preferred Options consultation, which you no longer maintain in this Housing Need consultation. The previous exceptional circumstances that you argued (which we disputed) were originally about Oxfordshire's role in the local and national economy as well as affordability issues. We note that these are no longer pursued.

We responded in November 2022 to the Preferred Options stating that we didn't agree that a critique of the Standard Method itself would be a valid exceptional circumstance. We do not support your approach. The Government sets out in the NPPF/NPPG that it expects all authorities to follow the Standard Method or provide an exceptional circumstance for doing something different. The NPPF and guidance doesn't say the

³ [Documents - Oxfordshire Plan 2050](#)

Standard Method is adjustable. The Standard Method is the Standard Method, the clue is the name. It's a set formula for all local authorities in England, with set inputs, and it isn't something to be corrected or doctored or something that can be manipulated to support a particular view of the world. The recent government consultation on the Levelling-up and Regeneration Bill and reform to national planning policy⁴ reiterates the expectation that the Standard Method is the starting point for determining housing need. It is not for Oxford City to attempt to pre-determine what, if any, changes the Government will make to the Standard Method when the new 2021 Census based household projections are published, but we note that until then Government intend to continue to use the 2014 projections at this time. Updates to the Standard Method take place periodically, as we have seen over the previous years since the Standard Method was introduced. The City Council therefore bases the only claimed exceptional circumstance on something that is likely to change over time. The recent consultation on the changes to the NPPF states:

“6. The government does not propose changes to the standard method formula or the data inputs to it through this consultation. However, the government has heard representations that the 2014-based household projections data underpinning the standard method should no longer be relied on. The government continues to use these data to provide stability, consistency and certainty to local planning authorities. Once we have considered the implications of new 2021 Census based household projections, planned to be published by the Office for National Statistics in 2024, the government will review the approach to assessing housing need, to make sure the method commands long-term support based on the most relevant data.”

The City Council is therefore arguing something that the Government has recently rejected. Your temporary objection to the 2014 projections being used to calculate the standard method isn't a valid exceptional circumstance for a local plan, which plans over the long term.

We question paragraph 2.4 of the consultation document:

“This shows that population growth in Oxfordshire is not as had been predicted in the ONS 2014-based population projections that feed into the Standard Method, but is 18,700 higher”

Even if this approach to explore alternatives to the standard method was correct (which we don't agree with), the ONS 2014-based population projections were never a prediction but a projection of what would have happened if population trends at that time were to continue. The period that informed that projection was 2008-2014, a period

⁴ [Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy)

when fewer than 1,700 homes were delivered each year in Oxfordshire. This increased to over 4,300 homes being delivered annually on average from 2014-2021, well over double the previous levels. It is inherently wrong to take this higher level of population growth – which follows as a direct consequence of the higher number of homes that were planned and delivered – as a baseline for justifying yet another step-change.

Notwithstanding this, we simply don't understand why you express the difference between the 2014 projections and the Census 2021 outcome as an Oxfordshire figure. You should restrict your consideration to exploring what the difference is in the population of Oxford, the area that your evidence base and local plan needs to cover. Indeed, the HENA actually shows that Oxford had a slower rate of growth than projected by the ONS 2014-based population projections, so it follows that any adjustment to the standard method would in all likelihood result in a housing need figure that was lower than the Government's minimum.

Alternative scenarios for calculating housing need are set out at paragraphs 2.5 to 2.12 in your consultation document. Paragraph 2.6 states:

“The HENA scenarios calculate housing need at an Oxfordshire level. This is because Oxfordshire operates as a Functional Economic Market Area (FEMA) and Housing Market Area (HMA).”

The NPPF does not recognise Housing Market Areas as the basis for calculating housing need, this was in the 2012 version of the NPPF but was removed in the 2018 version when the standard method was introduced. Also, there is no guidance in the NPPF/PPG about housing need calculations having a relationship to Functional Economic Market Areas. The HENA has been commissioned as an Oxfordshire assessment, which is neither promoted in line with the NPPF, nor supported by those other districts that the City Council have presumed to include, without any consultation or engagement with us. If Oxford City Council wants to use the County of Oxfordshire as an economic entity (a FEMA) to help determine business needs across the area, this needs some engagement with the other Oxfordshire authorities which so far hasn't been attempted. As we have responded to previous consultations about this lack of contact, as well as there being unsubstantiated exceptional circumstances to depart from the standard method, we must conclude that this is a failure of the duty to cooperate in your plan making process.

Your consultation document states at paragraph 2.6:

“Applying the two demographic projection scenarios to each district individually factors in part suppression of household formation”.

This suggests that demographic projection scenarios were prepared for each district individually, yet the HENA only presents figures for Oxfordshire. Any adjustment that covers the whole county assumes that all the district councils that you have included in the HENA think that your claim that there are exceptional circumstances to depart from the Standard Method is valid. South Oxfordshire District Council does not. The Standard Method already takes account of constrained household formation through applying an affordability adjustment. There is no need or justification to take an alternative approach.

In paragraph 2.6 again the consultation document states:

“Looking at Oxfordshire as a whole provides a far more robust figure of need.”

This statement makes it appear that all the other district councils that you have included within the scope of your HENA accept that the standard method calculation is wrong or not robust. Irrespective of the validity of the justification that the City Council pursues that the data inputs for the Standard Method constitute exceptional circumstances, it is not the City Council’s place to decide whether exceptional circumstances exist for Oxfordshire. We made this same point at the previous consultation. In fact, in 2017, the City Council highlighted the dangers of attempting to undertake planning at a county-wide scale, when you highlighted *“A threat to local communities through a remote planning process that could impose new homes on communities against the wishes of locally elected councillors and communities.”*⁵ And *“The people of Oxford need control of their community so as to reflect their needs, not those of other parts of a very diverse county area.”* Yet the approach you have taken in the HENA is attempting to do just that and appears to fail to recognise the diverse nature of the County.

There are no exceptional circumstances presented that justify (or attempt to justify) either the Cambridge Econometrics baseline trend scenario or the Economic development-led scenario being explored. The City Council hasn’t justified these scenarios appearing in the HENA.

Question 2 - Do you have any comments on the methodologies used in the HENA?

We are opposed to the HENA methodology and the 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. The three additional scenarios tested are unnecessary and inappropriate because there is no robust justification for departing from the Standard Method to determine housing need.

⁵ [Response to One Oxfordshire launch](#), 19 January 2017

Question 3 - Do you have any other comments on the Scenarios?

The final parts of the explanations for each scenario (in paragraphs 2.7 to 2.11 of the consultation document) are presented as a collated figure for Oxfordshire, for example at paragraph 2.7:

“This Standard Method collated figure for Oxfordshire shows a need for 3,388 dwellings per annum”.

We don't believe that it helps people trying to interpret the Oxford housing need, that the need from each scenario is only displayed as an Oxfordshire figure. You aren't writing an Oxfordshire Plan, but it's written like that. The style of presentation needs to reflect what the Oxford Local Plan can achieve and make it clear what the local plan's housing need is under each scenario.

Paragraph 2.8 sets out something called the 'Census-adjusted standard method' scenario. We have explained under question 1 above that we do not consider the Standard Method to be an adjustable calculation, as have Government in the NPPF consultation. It's the Standard Method. We do not consider your apparent dislike of the Standard Method results constitutes an exceptional circumstance. It isn't clear from your consultation document whether, when formulating this scenario, the consultants have factored in the same things as with the non-Census adjusted scenario, such as the cap. Paragraph 2.8 doesn't make it clear what has, or hasn't, been factored into this scenario. There is absolutely no information presented about the specific calculation for Oxford City. The City Council has failed to clearly explain the ways in which it differs from the Standard Method and offers no reasonable expectation as to why a variation from the Standard Method is reasonable, even within the City.

An 'Economic development-led scenario' is presented at paragraph 2.10 of the consultation document where it states:

“The NPPF, in Para 82, says that in setting out an economic vision, planning policies should have regard to local policies for economic development and regeneration. It is a valid exercise to assess the needs of a growth-focussed development strategy.”

This reads like a choice has been taken to be growth–focussed, using any reference to economic development in national guidance to justify that. Reference to the NPPF paragraph 82 is not a valid justification for the economic development-led scenario, because this is only loosely relevant. It is about having regard to the Local Industrial Strategy and other local economic policies when setting an economic vision and strategy in planning policies. The NPPF is presented by the City Council like an exceptional circumstance to justify testing a higher economic growth scenario for local plan housing

numbers. But this is national planning policy, and it applies to every English local plan in production. If this paragraph of the NPPF justifies economic growth scenarios being tested for everyone, this would have to be an exceptional circumstance for every local plan, which it isn't. Paragraph 82 does not reference housing need scenarios. Paragraph 82 of the NPPF requires us to 'have regard to' economic policy in developing economic vision and strategy, but it's equally important this be balanced against other sustainability matters when informing such decisions.

Paragraph 2.11 of the consultation document goes on to state:

“The LIS was pre-Covid, but the more recent Local Investment Plan (LIP) followed the LIS in late 2020. That means it was produced before the more recent economic downturn. The LIP cites a modest goal to add £1.2bn to Oxfordshire’s annual GVA by 2030. In effect, the LIP halves the GVA growth target originally outlined in the LIS. This £1.2bn increase is based upon only the more concrete economic development and investment plans in the area that have either already begun or are close to coming forward.”

We don't agree that an investment plan can be described as 'concrete' in terms of its GVA aspirations, because by its nature it aspires to draw investment. Nor can we know if the £1.2bn GVA increase is 'modest' given that this increase was an aspiration that was set prior to an economic slowdown. No recognition is given to the long-accepted view by most Oxfordshire partners that the economy within the City boundary is very different from that across the rest of the county.

Paragraph 2.12 of the consultation document states:

“The four scenarios tested cover the realistic range.”

It isn't clear what this means. The City Council needs to explain what 'realistic range' means and who has set any expectations about what might be realistic. We interpret the opposite, because you don't reflect the NPPF and you attempt to 'fish' for exceptional circumstances, so your approach is unrealistic. Paragraph 2.12 of the consultation document also states:

“the economic development-led scenario represents the highest realistic level of growth”

We do not agree that this scenario is a realistic level given that the scenario is rooted in the concept of economic growth at all costs, without balancing other environmental and social matters. It is presented without any economic-based exceptional circumstance being provided to justify the use of economic-led scenarios, and so should be withdrawn from consideration.

Question 4 - Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

Your consultation document states at paragraph 2.13:

“The Standard Method is not considered to lead to a good approximation of need in Oxford (or Oxfordshire)”

Oxford City’s Local Plan has no powers to make any determinations about the other Local Plans in Oxfordshire. To seek to do so is an act in poor faith and demonstrates a lack of understanding of the NPPF. South Oxfordshire and Vale of White Horse district councils in our Joint Local Plan are free to comply with national policy and accept the national Standard Method for housing need if this is right for our districts. We raised the issue of the City Local Plan making these decisions on behalf of other plans when we responded to your preferred options consultation in November 2022, but your current consultation document hasn’t reflected any changes since our response. This is not a reasonable approach, nor one that reflects the NPPF or national planning policy guidance.

At the time that the Standard Method was introduced in 2018, the NPPF clearly placed the focus on Local Housing Need being identified for individual Local Planning Authority areas. We believe that the City Council has failed to recognise this change. You are still using the outdated concept of preparing a Strategic Housing Market Assessment (SHMA) for a Housing Market Area (HMA) to try and save the methodology promoted in the 2014 SHMA and then the Oxfordshire Growth Needs Assessment (OGNA) when the Oxfordshire Plan was being prepared. But you have failed to prepare what the NPPF now requires: a Local Housing Needs Assessment that provides evidence about the housing needs of your own local area. Instead, the City Council is choosing to undertake every other local plan’s evidence base in Oxfordshire on their behalf, without their input, which is a hostile way to try to operate under the Duty to Cooperate. This is a highly questionable use of City residents’ council tax and fails to reflect the statutory roles of other bodies.

Functional Economic Market Assessments (FEMA) are referenced in the consultation document, but these are for determining employment need (for FEMA references, see Planning Practice Guidance⁶ regarding economic need entitled ‘How can authorities determine the type of employment land that is needed?’). FEMA references in your consultation document about housing need is inappropriate. In addition, we ask for your explanation of why you believe that the approach to establishing a local plan’s housing

⁶ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#economic-need>

need by district rather than county doesn't give a good estimate of housing need? This is another attack on the Standard Method calculation itself but without justification.

Your consultation document explains why the City Council doesn't prefer the economic development-led scenario in paragraph 2.14 by stating:

“The HENA considers two employment-led scenarios for identifying housing need. One of these is the economic development-led scenario, the objective of which is to estimate and understand the development needs associated with a realistic expectation of Oxfordshire’s economic development goals and projects set out in the LEP’s Investment Plan. These projects are important to Oxfordshire and of national significance and value. However, there are potential downside risks to economic growth and it remains possible that macro-economic events and funding constraints may slow projects down or lead to some not progressing. Given the current economic uncertainties, this scenario is not considered to be the most appropriate housing need scenario”

We would accept some of the issues raised about uncertainties. However, the reason why you should not be choosing this economic-led scenario is that there are no exceptional circumstances that justify the need for this scenario. Your narrative demonstrates a lack of understanding of both the NPPF and the Standard Method.

Paragraph 2.15 of your consultation document explains how the two scenarios of 'Census Adjusted' and 'CE Baseline Trends Forecast' are similar in terms of outcome and draws the conclusion that the close outcomes demonstrate robustness. However, two wrongs do not make a right. We believe that there are no exceptional circumstances for either of these scenarios.

Your consultation document oddly tries to introduce a new unsubstantiated exceptional circumstance at paragraph 2.15, which wasn't mentioned in the earlier section about 'exceptional circumstances', where it says:

“On balance, because the Census releases are not complete, and because one exceptional circumstance that justifies departing from the Standard Method is because it does not directly account for economic needs and therefore runs the risk of making existing housing shortages worse, the economic baseline trend scenario is the most appropriate scenario”.

Here your consultation document calls into question the HENA methodology for the Census Adjusted scenario, suggesting that it is incomplete. However, a disagreement with the Standard Method itself isn't an exceptional circumstance. The consultation document concludes with an 'economic baseline trend scenario' being used as an alternative to the Standard Method, but you give no related economic-based exceptional

circumstances to justify the use of this scenario. We do not believe that your approach is in line with the NPPF.

Question 5 - 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?

Why are the City Council attempting to divide Oxfordshire's housing need? This is well beyond the City Council's remit or authority. It is not for the City Council to determine the housing need for the whole county, and it is definitely not for you to unilaterally apportion that need between districts. What the City Council must do is identify the need for Oxford, yet the HENA fails to do this. The only figures that actually relate to the housing needs of Oxford City are the outputs from the Standard Method. Every other figure is an apportionment of housing need for the whole county.

Paragraphs 2.17 to 2.19 of your consultation document attempt to recreate the Oxfordshire Plan in many ways. Oxford City's Local Plan has no remit to make planning decisions on behalf of other districts surrounding it. It is particularly frustrating that such wording was used in the City Council's previous Regulation 18 consultation last year, and although we objected to the use of such approaches in our response of November 2022, we have been ignored. It is necessary to repeat some of our relevant November 2022 comments below:

“Oxford City Council cannot solely make determinations about the housing need required to serve all communities through Oxfordshire.”

“It is beyond the remit of this plan to draw conclusions for the whole county of Oxfordshire.”

“It is disappointing that this now appears to be commissioned before a discussion about collaboration with South Oxfordshire was had, which is not positive preparation. We remain open to engaging with the City Council on the methodology.”

The housing need consultation document undoubtedly ignores the concerns that we raised previously. Developing evidence on behalf of other local plans, whilst being fundamentally wrong, progresses the ill-fated OGNA into a HENA without our consent or engagement and is brazenly promoted in your consultation document as the right approach. This is a flagrant failure of the Duty to Cooperate in the production of your plan.

The first sentence in paragraph 2.17 of the consultation document starts with the following:

“Once a need figure for Oxfordshire is established...”

The City Council cannot establish an Oxfordshire housing need for the four other districts.

Paragraph 2.17 then says:

“it is necessary to apportion that to each district, in order for it to inform development of local plan...In the absence of an Oxfordshire Plan, and in order to try and assign the need to where it arises, alternative means of apportionment have been developed as part of the HENA.”

Whilst apportionment was an aim of the Oxfordshire Plan, this work has ceased and you cannot achieve an apportionment in the Oxford Local Plan alone, and with no discussion with us. The Oxford HENA has no mechanism to determine housing need in other districts. A mechanism for apportionment wasn’t developed for the Oxfordshire Plan before it ceased. The City Council have omitted to mention that the objective of the Oxfordshire Plan apportionment wasn’t about assigning need to where it arises, but instead was intended to be a sustainable and vision-led strategy approach, which would have needed to take account of oversupply and delivery records in certain districts. The apportionment approach described in the Oxford HENA stays silent on those matters.

In short, we do not support the approaches to apportionment that are set out in paragraph 2.18. They are irrelevant given that there is no remit for the City Council to undertake this exercise for other districts.

Question 6 - Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

Table 2.2 of the consultation document presents affordable housing need per annum.

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Cherwell	128	659	161	948	288	660
Oxford	255	567	188	1,010	270	740
South Oxon	91	520	88	700	199	501
VoWH	79	567	110	756	259	497
West Oxon	76	365	69	510	142	368
Oxfordshire	629	2,678	616	3,924	1,157	2,767

It shows a current need for Oxford City of 255 per year and a predicted net need of 740 per year. However, the City Council’s HENA makes a claim about affordable housing

need for all other districts. This has been included within the HENA without consultation or engagement with us. The first we knew of this was the publication of this consultation document. It is unreasonable and not justified to attempt to produce the specialist need evidence base for other local plans.

Question 7 - Do you have any comments about the assessment of housing capacity?

Your consultation document discusses capacity constraints in Oxford City from paragraph 3.2 to 3.8. Paragraph 3.2 sets some context about previous Oxford Local Plans having justified a housing requirement that falls short of the housing need:

“In Oxford successive plans have set a housing requirement less than the identified need because of capacity constraint, and this has been justified through local plan examinations.”

It is important to reflect on the exceptional circumstances that the City Council were able to explain at the time which justified that approach. Those circumstances, especially the need to plan collaboratively to meet the requirements for 100,000 homes as part of the Oxfordshire Housing and Growth Deal, no longer exist.

In November 2022 Oxford City Council published an interim HELAA which the consultation document explains was influenced by current planning policies. The City Council’s HELAA won’t be updated until the end of 2023, at which point it will consider new planning policies. Paragraph 3.3 of the consultation document states:

“the proposed policy approaches in the Preferred Options do not suggest that an update as we draft policies for the Oxford Local Plan 2040 will result in significant changes to the capacity estimate of the HELAA.”

We would like to see new policies and initiatives reflected in the updated HELAA. There is a need to promote development patterns that support the Oxfordshire Local Transport and Connectivity Plan and ensure that fewer car journeys are made. The November 2022 consultation response from Oxfordshire County Council to you expressed this clearly, describing how the City Council needs to be more articulate and consistent in its responses to the significant changes to transport policy. Press releases and local actions to deliver affordable housing are positive initiatives within the City, and this momentum could also be reflected in the way the HELAA is implemented. We would expect that your ambitions for a zero-carbon city would influence the HELAA too, with more accessible sites and efficient use of land being promoted. It is concerning to read at paragraph 3.3 of the consultation document that the City Council doesn’t envisage significant changes to the capacity estimate when new policies are applied. If the forthcoming HELAA update fails to respond to changes in policy approaches and fails to

find an increased supply of potential land within Oxford, then these policies changes will not have been responded to effectively.

At paragraph 3.6, your consultation document explains that the City Council has undertaken an exercise to review Green Belt parcels for their development potential. It should be clarified what the exceptional circumstances are for the Green Belt review of sites⁷. These are not the same exceptional circumstances for deviating from the Standard Method, but they are exceptional circumstances for altering a Green Belt boundary once it is established. There is an accompanying document alongside this consultation called 'Green Belt assessment of additional sites'. The assessment itself makes it clear that the assessment doesn't consider whether exceptional circumstances for altering the Green Belt boundary exist. However, we would have expected the consultation document to explain the position regarding Green Belt release and the exceptional circumstances, but it doesn't explain this. Also, Table 1.5 of the consultation document sets out the three sites with a low or moderate impact on Green Belt, if removed:

Site name and GB assessment conclusion	Comments	Conclusion
153-a Wildlife corridor at River Cherwell (moderate)	Site 153 is a long thin site adjacent to the River Cherwell, to the east of Summer Field School playing fields. For the purposes of the Green belt assessment it is divided into two parcels because of a variation in character. 153a was assessed as making a less important contribution to the Green Belt. However, the parcel is small and without clear access.	Do not consider review of Green Belt in this location.
118 Land rear of Wolvercote Social Club (low)	The majority of this site is not in Green Belt. A review of the Green Belt could not be justified to release the tiny amount of Green Belt within this site as it would not be needed to unlock the site and it would not itself deliver homes as it is too small.	Do not consider review of Green Belt in this location.
159 Wildlife corridor adjacent to Duke's Meadow (moderate)	This is a narrow strip of land adjacent to the railway and with no means of achieving access.	Do not consider review of Green Belt in this location.

One 'low impact' site is land to the rear of Wolvercote Social Club. The conclusion is to not release this from the Green Belt, and the comments state:

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NP_PF_July_2021.pdf

“The majority of this site is not in Green Belt. A review of the Green Belt could not be justified to release the tiny amount of Green Belt within this site as it would not be needed to unlock the site and it would not itself deliver homes as it is too small.”

It isn't clear from this commentary whether this Green Belt parcel could form part of a wider re-development opportunity with the social club itself or some other adjacent land that isn't in the Green Belt. If it is an opportunity to make efficient use of the land, there could be merit in maximising opportunities for development potential if Green Belt release is justified.

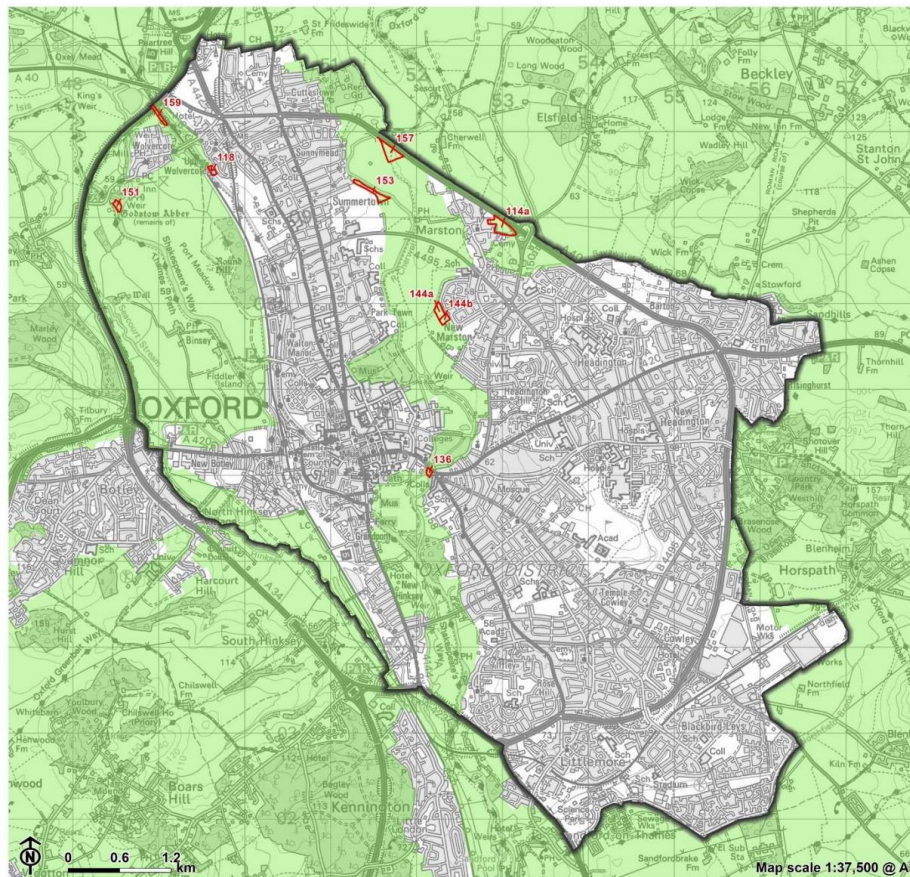
Paragraph 3.7 of the consultation document has some references explaining why some sites were excluded, but these are vague:

Most Green Belt parcels were not included in the assessment because they are protected for reasons in addition to the Green Belt, such as because they are playing pitches (that had not been promoted with proposals for their replacement), of biodiversity value, or of functional flood plain. This means that few parcels were assessed. 9 sites (some of which are divided into smaller parcels) were reassessed to check the results from the previous Green Belt assessment were still applicable. 10 new sites were assessed.

Where this paragraph says that most Green Belt parcels were not included, we think that you should be clear about what 'most' means in this context. It is not clear how many of the Green Belt parcels do not have other policy designations but were still excluded.

Green Belt assessment of additional sites accompanying document feedback

On pages 9 and 10 of the Green Belt Assessment there are some maps of Green Belt (in green) and the sites that have been tested (the small areas shown in red outline below).



These maps use a Green Belt base which is now out of date. Several Green Belt parcels were released in the South Oxfordshire Local Plan in areas surrounding Oxford, but the map still displays these parcels as Green Belt. The map should be updated to reflect current Green Belt boundaries.

Similarly, the map extracts related to the assessment sites are out of date on page 33. This is Site 114a - Land at Marston Brook (northern part). The maps do not show the correct Green Belt boundary. The land removed from the Green Belt to accommodate the allocation at 'Land north of Bayswater Brook' in the South Oxfordshire Local Plan is still mistakenly shown as Green Belt. Paragraph 4.7 of the Green Belt assessment sites:

“The parcel is undeveloped farmland but forms part of broader area of Green Belt that is dominated by urban fringe uses and separated from the wider countryside by the A40 and B4150. This limits its role in safeguarding the countryside from encroachment.”

This map error, as well as the analysis at paragraph 4.7 referencing ‘broader areas of Green Belt’ suggests that the site may have been incorrectly assessed without the proper context of the 2020 revision to the Green Belt boundary.

Question 8 - 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?

The Standard Method calculates your housing need. In the absence of exceptional circumstances, the NPPF says that you should be using the Standard Method. Housing need should not be based on the Economic Baseline Scenario generated by Cambridge Econometrics. Moreover, that analysis has only considered the need for the whole county, which has then been apportioned in various different ways. The scenario does not assess the housing need for Oxford City. The only housing need figure that has been provided for the City itself is the Standard Method approach.

We have previously commented in November 2022 about the low predicted capacity set out in the interim HELAA. As such, the housing need is inflated well above the initial capacity of the City, and the gap between housing need and capacity is much greater than it should be.

The City Council intends to set Oxford’s housing requirement to match Oxford’s capacity, but with an inflation of the former and an underestimate of the latter. This ‘capacity-led approach’ (which has been the same approach used in the previous Local Plan) hasn’t met the potential of delivery of housing in the City.

It isn’t clear from the consultation document how any windfall development (coming forward beyond the housing requirement) would be taken into account.

In the conclusion of your consultation document, you state:

“If it is appropriate, a stepped trajectory will be proposed whereby a greater number of homes are required in some years of the plan than others.”

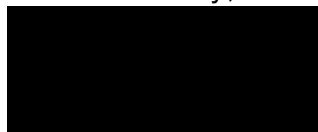
The consultation document should explain what the rationale is for introducing a stepped trajectory at this stage. It is included as a possibility without a reason provided as to why a stepped trajectory may be required.

The consultation document mentions the contribution towards the housing needs of Oxford that surrounding districts have made. This is a welcome inclusion and some recognition of the very large contribution towards housing need that South Oxfordshire District Council is making, and much of this development is still yet to deliver within this new plan period.

Concluding comments

To conclude, we have serious concerns about many aspects of this Housing Need Consultation. We have set out our thoughts in response to each question about the HENA and its methodology, the lack of any exceptional circumstances to deviate from the Standard Method, the housing capacity, the chosen housing need and capacity-led requirement and also the way in which Oxfordshire housing needs and specialist housing need are being considered by the City. 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. We would be grateful to hear your thoughts on our responses, particularly as we are yet to hear how our November 2022 response is being addressed.

Yours sincerely,



Planning Policy Team Leader
South Oxfordshire District Council