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Mark Stone
Chief Executive
South Oxfordshire District Council

22 December 2023

SENT VIA EMAIL

Dear Mark

Oxford Local Plan 2040: Formal request to assist with Oxford unmet housing need

I write to you regarding the Oxford Local Plan 2040 and in particular the challenge Oxford faces in meeting its housing needs.

You will be aware that Oxford City Council has recently published its Regulation 19 stage of the Local Plan 2040, which considers how to manage the competing challenges facing the city of housing, the economy, environment and infrastructure. A fundamental challenge in this is that the housing need for Oxford far exceeds the capacity of the city: this is a long-standing issue and has been discussed for many years with the Oxfordshire local planning authorities through various collective forums and collaborative working initiatives both at officer and member levels.

We all worked collectively to address the unmet need identified in our current Local Plan 2036, through the Oxfordshire Growth Board forums, and ultimately this culminated in an apportionment of the unmet need for each district. Subsequently, each district incorporated their apportionment into the current round of Local Plans and included site allocations accordingly. It is a very positive step that many of the identified sites related to Oxford unmet need are already now under construction, and several more are in the planning process.

As the Oxford Local Plan 2040 looks slightly further ahead to 2040, the evidence needs to revisit the housing need for Oxford and the subsequent level of need that cannot be accommodated within the city boundaries. The updated housing need evidence is set out in the Housing and Economic Needs Assessment (2022) (HENA) and the updated evidence on capacity is set out in the Housing and Economic Land Availability Assessment (2023) (HELAA). The HENA identifies a housing need in Oxford of 1,322 dwellings per annum. [The Housing Need Background Paper 1](#) sets out the exceptional circumstances for not using the Standard Method and explains how the need figure has been derived. The housing requirement set out in the submission draft Oxford Local Plan 2040 is 481 dwellings per annum, which is based on the capacity identified in the HELAA (9,612 homes over the plan period).



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The level of unmet need in the Local Plan 2040 is therefore calculated as follows:

Total need 2020-2040	26,440
Total capacity 2020-2040	9,612
Unmet need 2020-2040	16,828
Provision already made in current local plans (which had not been delivered before 2020)	14,300
Remaining unmet need 2020-2040 to be addressed	2,528

The Oxford Local Plan 2040 includes a number of policies designed to maximise housing capacity and delivery in order to minimise unmet need, including:

- Site allocations for residential development, including minimum housing numbers where appropriate;
- Minimum housing numbers and capacity assumptions being based on highest appropriate density assumptions;
- Including assumptions for windfall housing developments within the capacity assessment;
- Allowing housing on all employment sites;
- Assessing all greenfield sites for their intrinsic value and allowing development on some (where surplus or can be replaced, in compliance with NPPF approach);
- Not allowing loss of dwellings
- Including a policy preventing the loss of existing homes; and
- Allowing uses other than new homes only in city and district centres and where already established as a lawful use, and also not allocating new sites outside the areas for other uses, thus prioritising housing.
- Delivery of housing, particularly affordable housing, is a key priority of the City Council, and there are further measures from across the council more widely to increase the supply of housing in Oxford, including setting up the housing company OX Place to deliver over 2,000 homes in the next 10 years, including on sites that would not be considered commercially viable. It has already successfully delivered 6 schemes in the city, with two more to be available shortly, delivering 215 homes so far (including 20 homes at The Curve, Between Towns Road; 90 homes at Railway Lane, Littlemore and 43 homes in Rose Hill).

However, despite taking a very positive approach to delivering housing in Oxford, the highly constrained nature of the city and the lack of land for expansion of the city means there is a limited supply of new sites and not enough to meet identified needs. The tightly drawn boundary around the city and lack of available land means that that there is simply no way that a greater number of homes can be delivered in a sustainable manner.

A substantial amount of work has been undertaken between respective authorities to address the Duty to Co-operate in recent years. As part of this process, officers from our Planning Policy Team have been liaising with officers from your authority throughout the preparation of the OLP2040 and in the lead up to the Regulation 19 stage consultation through various channels. We intend to set up further meetings in January to discuss the Statement of Common Ground that we would like to have in place between our respective authorities before the end of March when we formally submit the OLP2040 for Examination.



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We appreciate that districts in Oxfordshire are at different plan-making stages. We also understand the very real pressure you have in meeting your own needs. However, under the 2011 Localism Act and the provisions of the National Planning Policy Framework (NPPF), I am writing to you now to formally ask whether your authority would be able to meet any of Oxford's unmet housing need? I look forward to hearing from you on this important issue and would be grateful for a response by 31st Jan 2024.

Yours sincerely



Caroline Green
Chief Executive



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