

South Oxfordshire and Vale of White Horse Joint Local Plan EIP

Matter 3: Housing Target Requirement

ISSUE – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing and the housing requirement?

NB. This matter focuses on the housing target/requirement for the Plan and the evidence base which underpins it. The broad assumptions within the Joint Housing Needs Assessment (JHNA) (HES15.1) will be addressed, including the methodology used to align the respective requirements arising from the JHNA and the Local Housing Need assessment. Affordable housing, specialist housing need and other housing policies will be addressed in Part 2 Hearings.

Policy HOU1

Q3.1 Is the calculation of the housing target/requirement set in Policy HOU1 consistent with the Local Housing Need standard methodology set out in national guidance?

1. The calculation is consistent with the standard method required by NPPF23.

Q3.2 Are there exceptional circumstances which warrant the Plan taking a different approach to the Local Housing Need standard methodology? If so, what evidence is there to support this?

2. As set out in our representations Oxfordshire has a continues to be a focus for strong economic activity, with successive Governments recognising the County, alongside its neighbours in the Oxford Cambridge Arc, are a key part of the national economy in a range of sectors and, as noted by the National Infrastructure Commission, that housing supply is a key barrier to future investment and ensuring the areas achieves its economic potential. Therefore, the need to deliver sufficient growth to ensure investment is not compromised is clearly a circumstance justifying a different approach to assessing housing needs.
3. However, no robust attempt has been made by the Councils to consider whether the housing requirement being proposed by the JLP will be a barrier to investment and economic growth in SODC and VoWH, or in fact across Oxfordshire as a whole. The JHNA for example provides limited consideration on this matter simply stating:

“We would also note that a concurrent Employment Land Needs Assessment was undertaken for both local authorities. This yielded a projected jobs growth for both of the areas which is consistent with achieving a balance between the number of workers in the areas and the number of jobs when sustainable commuting flows have been allowed for. Therefore, there is no requirement for a higher dwelling target to accommodate the projected workforce.”

4. However, neither the JHNA nor the ELNA, which sets out job’s growth expectations for the JLP, considered other evidence on jobs growth beyond those proposed by Oxford Economics. Nor do there appear to be any considerations as to whether jobs growth will be higher in future to reflect the investment that has been made in the County in recent years, and conversely the potential negative impact on economic growth and investment in and around Oxford, should housing growth be constrained. The decision not to consider the potential for higher economic growth scenarios runs counter to the joint working that had taken place prior to the decision not to progress with the Oxfordshire Joint Statutory Spatial Plan. The only piece of work considering higher growth scenarios was the Housing and Economic Needs Assessment published by Oxford City Council. HBF recognises that the inspectors examining the Oxford City Local Plan did not consider this piece of work to be sufficiently robust to justify using it as an alternative approach to assessing housing needs. But this does not remove the fact that Oxfordshire remains a focus for growth and that some consideration needed to be given as to whether the level of jobs growth being proposed in the ELNA took account of future growth and whether the housing requirement would need to be increased to ensure housing was not a barrier to investment.
5. In our hearing statements we refer to the recent announcements in the Autumn budget to unlock land for new development and investment opportunities. The budget statement clearly indicate that jobs growth has the potential to be higher than set out in the ELNA and could be more line with the higher growth scenarios set out in earlier housing needs assessments. It is therefore a clear failing of the JLP not to even consider alternative economic growth assessments alongside its neighbours in Oxfordshire and whether these would require an alternative approach to the housing requirement for SODC and VoWH.

Q3.3 The Councils’ response to IQ58 sets out how the Plan takes account of the previously agreed Oxford City’s Local Plan 2036 unmet need. Does this response sufficiently demonstrate that the Plan accommodates the unmet need in full?

6. The position taken by the Councils, as set out in their response to IQ58 of LPA02, in relation to the delivery of homes in VoWH towards Oxford’s unmet needs is that between 2019/20 and 2020/21 these needs have been met in full. However, such a position does not take into account that the VoWH Local Plan has a plan period of 2011/12 to 2030/31 and that homes delivered in 2019/20 and 2020/21 can’t automatically be considered as addressing unmet needs of Oxford. Looking at delivery in VoWH in the first half of the plan period in their adopted local plan the Council delivered 10,169 homes – a shortfall of 111 homes against needs over the same period of 10,280. Therefore, to state that the unmet needs of Oxford were addressed in 2019/20 and 2020/21 seem to be simply repurposing delivery during these two years to meet the needs of Oxford which would appear to be required to address shortfalls in the adopted local plan. On the basis that there was a shortfall against the

Council's own housing needs up to 2020/21 it cannot be concluded that any of Oxford's unmet needs have been addressed by VoWH the Council will need to increase its housing requirement to 2031 to take into account 2019/20 and 2020/21.

Q3.4 Is the approach of meeting Oxford's City's unmet need in terms of the use of a stepped trajectory and also not identifying a separate trajectory, justified and consistent with national policy?

7. The use of the stepped trajectory in HOU1 is an outcome of the fact that no consideration has been given to meeting Oxford City's unmet housing needs beyond 2031 for VoWH or 2036 in SODC and is a symptom of the Councils failing to co-operate effectively with Oxford City during the preparation of the JLP.
8. With regard to the need for a separate trajectory the issue outlined in our response to Q3.3 would not have arisen had a separate trajectory and allocations to meet that trajectory been included in the adopted local plan. To avoid this situation in future, and ensure the plan is effective, is a separate trajectory setting out what homes have been delivered to meet Oxford's unmet housing needs is necessary. This would ensure that HOU1 is unambiguous and clear as to how a decision maker should react, as required by paragraph 16 of NPPF23.

Q3.5 How does the Local Housing Need calculation compare to the calculation of housing need set out in the JHNA (HES15.1)?

9. For Council.

Q3.6 The JHNA defines the specialist housing need for affordable housing and specialist housing need including for older people for the Plan area. Is the use of a 10-year migration trend variant of the 2018 based household projections, adjusted to take account of the 2021 Census and mid-year population estimates, an appropriate demographic basis for determining housing need? Are the assumptions contained within the Study justified?

10. No comment.

Q3.7 Is the approach used to align the recent trend household growth with the LHN target set out at paragraph 5.7 onwards of the JHNA and explained in the Councils' response to IQ55 justified? Are the migration rates utilised to match the LHN figure justified?

11. No comment.

Q3.8 Paragraph 4 of the Executive Summary of the HNA together with the Councils' response to IQ56, sets out how the housing target/requirement (31,020) would meet the projected jobs growth/workforce of 16,082 workers as determined in the Employment Land Needs Assessment (ELNA). Are the assumptions set out at IQ56.7 of the Councils' response and Table 56.1 of the Councils response, justified?

12. The ELNA uses single jobs forecast within SODC and VoWH. It does not consider the impact on investment Oxfordshire on jobs growth across the area covered by the JLP, or across the county as whole. As such the Council's response in IQ56 does not provide any reassurance that the proposed housing requirement will provide sufficient housing to meet jobs growth within SODC or VoWH. There is a significant risk that the housing requirement in the JLP will, as it has for many years, constrain economic investment, contrary to paragraph 85 and 86 of NPPF23. In order to ensure the housing requirement is consistent with the expectations of the NPPF further work is required to understand the potential for economic growth not only in SODC and VoWH but across Oxfordshire. However, the Councils have not undertaken this work either unilaterally or in partnership with others rendering the JLP not only unsound but also failing to maximise the effectiveness of plan making under the duty to co-operate.

Q3.9 The Councils conclude at IQ56.8 that the Plan's housing requirement/target would yield a surplus of 4,553 economically active persons compared to that required to support the forecast jobs growth. Is there any evidence to suggest that this conclusion is not justified?

13. As set out above the Councils have not undertaken a detailed assessment on the link between employment growth and housing needs. The ELNA provides the jobs growth figures based on the outcomes of one forecast, but no attempt appears to have been made to cross check this figure with other forecasts and whether this level of jobs growth will be sufficient to support the economic growth expectations of the area. There is a distinct lack of evidence on the interplay between economic growth and housing needs that should have been addressed prior to submission.

Q3.10 In overall terms, are the respective housing requirements for South Oxfordshire (16,530 homes) and Vale of White Horse (14,490 homes) between 1 April 2021 and 31 March 2041 set out at Policy HOU1 of the Plan appropriate and justified?

14. No. HBF recognise that these are the minimum number of homes that should be provided under the standard method. However, insufficient consideration has been given to the interplay between job growth and the housing requirement. Oxfordshire is one of the most important areas for economic growth in the country. It is home to world leading industries that will find it increasingly difficult to grow if insufficient homes are built. Yet the Council have not considered whether growth will be in excess of what is suggested in the ELNA and have paid cursory attention to this key issue in the JHNA. Without further evidence considering these issue HBF do not consider HOU1 to be justified.

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