

West Oxfordshire Local Plan.

Stage 3

Matter 16: Five year supply of deliverable housing land

16.1 Is it appropriate for the plan to have separate housing requirement figures for West Oxfordshire's own housing needs and for the unmet needs of Oxford City? Would such an approach have any practical benefit? Should there instead be a single housing requirement figure for the plan reflecting both needs?

The HBF considers that there should be a single housing requirement figure. Local Planning Authorities must plan to meet the needs for both market and affordable housing across the Housing Market Area. Where one authority cannot meet that need then it is necessary, where appropriate, for other areas to increase delivery. As such West Oxfordshire is delivering additional housing in its own area in recognition that a degree of unmet need within Oxford City will inevitably fall on its shoulders. It does not make sense to consider delivery of this specific part of overall need separately to the rest of the plan.

However, we recognise that the Oxfordshire Growth Board has agreed that the unmet needs of Oxford City will be provided for by all the hinterland Oxfordshire authorities from 2021 onwards (although it encourages delivery sooner than this if possible, and this is what West Oxfordshire has said it hopes might happen). Therefore, although the HBF would prefer for the unmet needs of Oxford City to be provided for as soon as possible, if not from day one, we recognise that delivery may be delayed until 2021. If the inspector endorses this deferral, it will be appropriate to roll-up West Oxfordshire's OAN and its share of Oxford City's unmet need into a single housing requirement figure from 2021. So the housing requirement for performance monitoring purposes would be:

West Oxon housing requirement 2011 - 2021

= 660dpa

West Oxon housing requirement 2021 – 2031

= 660dpa + 275dpa = 935dpa (West Oxon's share of Oxford City's unmet need which is 2,750 divided by 10 years)

Please note that this is a simplified example and does not consider any residual requirements arising from the under delivery of housing since 2011.

Having said that we cannot see any practical benefit to having a separate requirement. Indeed there is a significant disadvantage in that any unmet need arising now due to the constraints faced by Oxford City will be met much later than required. These needs can, and should, be met from anywhere within the HMA and as such the full housing requirement for the plan should be reflected across the plan period.

16.2 In determining the five-year housing requirement figure:

- ***Is it appropriate for the shortfall in housing delivery in the early years of the plan period to be addressed over the remainder of the plan period (i.e. the "Liverpool" method)?***

No. It is essential that the Council does not ‘put off’ the delivery of its significant backlog in housing needs that has accrued since 2011 until later in the plan by using the Liverpool methodology. This will place delivery of the plan at risk should any of the proposed strategic sites not come forward as set out in Appendix 2 of the Local Plan. Indeed the Council acknowledges its concerns about the slow delivery of strategic sites in paragraph 5.25. In recognition of this risk it should be seeking to spread delivery across the whole plan period by increasing the mix of available development opportunities. This would give time for strategic sites to be built out without compromising overall delivery of the plan.

This issue could become more challenging for the Council because of its decision to only consider unmet needs from Oxford City from 2021/22. This means that both a significant proportion of the existing backlog and of Oxford City’s housing need (1272 and 2750 dwellings respectively) must be delivered within the last 9 years of the plan. Combined with West Oxfordshire’s requirement for this period of 5940 new dwellings the Local Plan will need to deliver just over 62% of the total requirement in the second half of the plans lifetime. We therefore have serious concerns that the Liverpool methodology is being used to mask wider problems with regard to the plans effectiveness and whether, as set out in paragraph 182 of the NPPF it is “deliverable over its period”.

Whilst we recognise that using the Sedgefield method will place an increased burden on the Council to deliver sites in the next five years Planning Practice guidance is clear that “Local Planning Authorities should deal with any backlog in the first five of the plan period where possible”. Consideration therefore needs to be given as to whether the Council has considered sufficiently the possibility of addressing this backlog within the first five years of this plan being in operation. In our response to the main modifications we highlighted that the Council should have been looking to increase the supply of small and medium sites as a way of increasing delivery in the earlier part of the plan which would in turn reduce the reliance on large strategic allocations. This could have been done through additional allocations within villages of small sites of less than 10 units and increasing non-strategic allocations of between 20 and 100 dwellings. Just because delivery in the later part of the plan is convenient does not mean it was not possible to address the backlog in the first five years.

- ***Is it appropriate to use a 5% ‘buffer’ in the calculating the housing requirement figures?***

We do not believe it is appropriate to use the 5% buffer as there has been consistent under-delivery of housing during the first 6 years of the plan period for the Local Plan. Since the 2011 the Council has delivered a total of 1982 homes, an average of 330 dpa compared to its South-East Plan target of 365 dpa and half of the 660 homes required per annum to meet the Borough’s objectively assessed housing needs. This under delivery is further emphasised against the housing requirement set out in the Plan and represents a severe under performance against an annual requirement of delivering 798 dpa.

Year	Completions (AMR)
2001/02	392
2002/03	450
2003/04	567

2004/05	629
2005/06	733
2006/07	810
2007/08	865
2008/09	578
2009/10	384
2010/11	424
2011/12	359
2012/13	278
2013/14	186
2014/15	395
2015/16	246

Looking further back whilst completions were high between 2003/04 and 2008/09 it is evident that the Council has seen a significant decline in delivery since 2009/10. During this time the average annual delivery rate was just 324 dpa compared to an average delivery since 2001/02 of 486 dpa. It is clear that since the change in Government in 2010 there has been a persistent under delivery by the Council against both its SE Plan targets, housing needs and the requirement set out in the Plan. We recognise that this period would have been affected by the 2008 recession, however, it is clear that even 7 years past this point housing delivery remains significantly lower than assessments of housing needs. In our opinion this level of under delivery points to the application of the 20% 'buffer'.

16.3 Overall, is there convincing evidence to demonstrate that:

(a) There are sufficient specific and deliverable housing sites to provide a supply of housing land of at least five years' requirement?

This will depend on the approach taken to the five year housing land supply. If the Liverpool method is applied and Oxford City's unmet need is not addressed until after 2021 then there would appear to be sufficient developable land. However, if Oxford City's unmet need is spread across the plan period then only where the Liverpool method is applied with a 5% 'buffer' is there sufficient supply to meet the 5 year requirement. If a 20% 'buffer' is applied or the Sedgefield method used then the Council will not have a sufficient deliverable sites to meet their five year housing land supply requirement. This is shown in table 1 below.

Approach to backlog	5 year housing land supply based on a requirement of 660 units between 2011 and 2017 and delivering Oxford City's unmet need in 2021/22				5 year housing land supply based on a requirement of 798 units between 2011 and 2017 (i.e. Oxford City's needs planned through the plan period)			
Method used	L'pool (5%)	L'pool (20%)	S'field (5%)	S'field (20%)	L'pool (5%)	L'pool (20%)	S'field (5%)	S'field (20%)
Base requirement	3300	3300	3300	3300	3990	3990	3990	3990
Backlog	707	707	1978	1978	1002	1002	2806	2806
Provision for Oxford City unmet need 21/22	275	275	275	275	0	0	0	0

Requirement 2017 - 2022	4282	4282	5553	5553	4992	4992	6796	6796
Buffer applied (5%/20%)	4496	5138	5831	6664	5242	5991	7136	8155
Supply	5258	5258	5258	5258	5258	5258	5258	5258
Under/over supply	762	120	-573	-1406	16	-733	-1878	-2897

Table 1: Assessment of 5-year supply

(b) There are sufficient specific developable sites, or broad locations for growth to meet the plan period housing requirement?

And in particular:

- ***Does the overall supply of housing land place too much reliance of large, strategic sites?***
- ***Does the overall supply of housing land place too much reliance on sites which will not deliver until after 2021?***
- ***Is it feasible to deliver the 2750 homes which the plan proposes to provide in connection with Oxford City's unmet needs in the ten year period 2021-2031?***

As set out above we consider there to be an over reliance on large strategic sites. Based on appendix 2 of the Local Plan (CD5) 7500 of all the dwellings to be delivered during the plan period are from sites of over 200 units. This means that 47% of all delivery will come from larger sites. In addition 5500 dwellings will be delivered from just 4 sites. However, it is the scale of delivery that is expected within the later part of the plan that must be a major concern as to its effectiveness and deliverability. The Council are expecting 6479 dwellings to be delivered on allocated sites in the last 9 years of the plan. Of these dwellings 4950 are expected to be delivered on the 4 largest strategic sites. If any of these sites were not to come forward as expected then it would compromise the delivery of the plan. Given the potential risks it is also surprising that the Council have not looked to set out any contingency measures within the Plan should delivery of these strategic sites be delayed.

We are concerned as to the feasibility of delivering 2750 homes to meet Oxford City's unmet need within the 10 year period and across just two sites. Research by Lichfields¹ suggests that the average rate is 161 dpa. There is an additional question as whether they can meet these additional homes alongside those required to meet the housing required during this period? As set out in our response to question 16.2 the Council are expecting that 62% of their total housing requirement will be delivered after 2021. Planning this scale of housing in a relatively short period could have consequences for rate at which new homes are built across the District.

When all these factors are considered together this Local Plan has the potential to saturate the market during the second half of the plan period and slow down the rate of delivery. Whilst there may be potential to increase the number of outlets on each strategic allocation to assist with build out rates it would have been reasonable for the authority to have identified and allocated a greater number of small and medium sized

¹ Start to Finish How Quickly do Large-Scale Housing Sites Deliver? (November 2016)

sites across the plan period. This would have provided more flexibility within the plan in relation to the delivery of the housing requirement and reduced the inherent risk of concentrating delivery on a few large strategic allocations. It would also have had the added benefit of supporting smaller developers by providing more sites with a greater certainty that development will be supported.

- ***Is it appropriate to include C2 residential development in the housing supply figures?***

In general we do not believe it is appropriate to consider C2 uses as part of housing need. Whilst we recognise the Planning Practice Guidance sets out that C2 accommodation related to both residential institutions for older people and student accommodation can be included there is the risk that a significant proportion of the housing requirement could be delivered as bed spaces rather than new homes. However, if, as the Council has proposed in paragraph 2.17 of the Housing Land Supply Position Statement (HOU21) that this would only apply to 'self-contained' properties this may be considered acceptable. However, a clear definition would need to be agreed and included in Local Plan as to a 'self-contained' property.

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