

## MATTER 2: Unmet housing needs from Oxford

### 2.2 What are the arrangements for reviewing or updating this working assumption?

The unmet portion of the objectively assessed needs for Oxford City have formed the basis of discussions between the other local planning authorities within the housing market area as to how it will be met. A Memorandum of Cooperation was published by the Oxfordshire Growth Board in October 2016. Its purpose was to:

***“...formally record and make public the Oxfordshire Local Authorities’ agreement under the Duty to Co-operate to the position as set out in this Memorandum, subject to LPA ratification by their full Councils as part of their individual Local Plan preparation”*** (para. 1.4 refers).

Working on the basis that the level of unmet need from Oxford City was 15,000 dwellings, the Vale was provided with an apportionment figure of 2,200 dwellings. This figure has not been subject of any public consultation. We are also aware that South Oxfordshire is planning for a lower apportionment figure than the Growth Board’s work suggested was necessary (see their Final Publication Version of the Local Plan).

The Memorandum identifies that the level of unmet need for Oxford City will be tested through the Oxford City Local Plan Review (para. 3.3 refers). The latest information provided on Oxford City’s website indicates that the Examination of the Local Plan Review will not commence until Spring 2019 at the earliest. This is just under 12 months from now.

The Examination of Oxford’s Local Plan Review will provide the first opportunity for the level of Oxford’s unmet need to be critically assessed. Accordingly, it is quite possible that the level of objectively assessed needs for Oxford City could be found to be insufficient and consequently there could be a need to increase the objectively assessed need further. This will have a knock-on impact for the other local planning authorities within the housing market area, who would also need to accommodate further levels of growth to assist meet a higher level of unmet housing need.

In addition, the evidence emerging from work on the Oxford City Local Plan illustrates that the likely supply of housing land is less than had previously been assumed. The Preferred Strategy which was published as a consultation document in June 2017, provides contextual information relative to likely housing supply within the City’s administrative area. The Oxford Housing and Economic Land Availability Assessment (HELAA) assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The HELAA estimates the capacity to be 7,511 for the period 2016-2036. In the previous work, the 2014 Strategic Housing Land Availability Assessment (SHLAA), identified a capacity for 10,212 dwellings for the period 2011-2031. It is apparent that the anticipated housing supply is diminishing from that which was assumed in the Growth Board distribution. It is possible therefore that the Oxford City unmet need figure is greater than the 15,000 assumed in the Growth Board apportionment.

Given these uncertainties, it is necessary for the Plan to include an element of flexibility to cover the eventuality of having to accommodate a higher level of Oxford’s unmet housing need than currently proposed.

We are however concerned that at present the LPP2 does not provide any flexibility for this in either Core Policy 47A, or Appendix N.

This should be addressed through the Examination process.

**2.3 Is the spatial strategy for meeting these unmet housing needs in the Abingdon on Thames and Oxford Fringe Sub Area the most appropriate when considered against reasonable alternatives and supported by proportionate evidence?**

No.

Page 20 of the Consultation Plan confirms that the Vale's apportionment of Oxford's unmet housing need (currently 2,200 dwellings) will be delivered from sites allocated in both the LPP1 and 2, located within the Abingdon-on-Thames and Oxford Fringe sub-area.

The justification for this distribution is provided in para. 2.16 of the LPP2. The proximity of the Abingdon sub-area and its frequent and reliable public transport linkages to Oxford is cited as being the principal justification for the distribution strategy.

Whilst the unmet housing need will now be met closer to Oxford than previously proposed, the Council is reliant upon sites from the LPP1, which were assessed and considered suitable to accommodate the need and demand for housing within the Vale itself. As outlined in the Council's Site Selection Topic Paper (October 2017), four sites allocated to provide 1,660 dwellings in the Part 1 Plan and therefore were identified to meet the Vale's own housing needs, are now to be used, together with one further site, to meet unmet housing needs from Oxford City.

Consequently, the distribution of housing assessed by the LPP1 Inspector and found to be sound, has now been significantly revised, with the Abingdon sub-area, like the Western Vale, now having a reduced role in meeting the Vale's own housing needs.

Whilst the reduced role for the Abingdon sub-area is justified, no justification is provided as to why the Western Vale was not considered to play its proportionate role in meeting the Vale's own housing needs, let alone a reduced role.

Despite the LPP1 establishing the important role the Western Vale should have in housing delivery in the Vale, and Faringdon being one of 3 focuses for growth within the District, the LPP2 does not seek to redistribute the housing that had previously been used to meet the Vale's needs, that instead will now be used to meet the unmet housing needs of Oxford City, to the Western Vale. This housing will instead be focused within the South Eastern Vale, where significant concerns exist regarding the deliverability of the quantum of development proposed over the Plan period (see LRM Planning's response to Matter 3).

The redistribution of the Vale's housing needs in the manner proposed by the LPP2 significantly alters the spatial strategy and distribution of housing within the LPP1, which was tested through Independent Examination and found to be the most appropriate strategy, and indeed sound.

Consequently, the revised strategy promoted by the LPP2 cannot be considered the most appropriate strategy and is therefore an unsound proposition.

With the Inspector having endorsed the LPP1, it would be more appropriate for:

1. Allocations made within the LPP1 to remain key elements of meeting the Vale's own housing needs; and
2. To distribute the unmet need for both the Vale and Oxford City, in accordance with the LPP1's spatial planning framework.

This would necessitate the LPP2 recognising the rightful role the Western Vale can and should play in meeting the Vale's and Oxford City's unmet housing needs and require additional allocations in the sub area.

**2.7 To what extent is the strategy for meeting these unmet needs sufficiently flexible if the working assumption figure is revised in future?**

As outlined above, there is no mechanism or flexibility within the LPP2 should the working assumption figure for Oxford City increase in the future.

Core Policy 47a needs to provide a clear framework of the Council's actions should the working assumption figure increase in the future.

The strategy adopted by the LPP2 would not in itself provide the sufficient flexibility to respond to an increase in the working assumption figure. The full use of the LPP1 spatial strategy and its accompanying distribution of development, would go a long way to providing much needed flexibility.

***LRM Planning***  
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