

## SODC LOCAL PLAN 2034 – EXAMINATION IN PUBLIC

### HEARING STATEMENT – Ginette Camps-Walsh

On behalf of

#### Beckley and Stowood Parish Council and Beckley and Stowood Neighbourhood Plan Steering Group

#### **Matter 1: Is the housing requirement soundly based?**

**Issue a: *The figure of 775 dpa comes from the Oxfordshire SHMA 2014; the local housing need (LHN) figure derived from the standard method is 627 dpa.***

***Have appropriate factors been applied to reach the housing requirement figure?***

There are many different versions of housing need calculations for SODC, Oxford City and calculations for the Oxfordshire Housing and Growth Deal, and SHMAs (Strategic Housing Market Assessment). There appears to have been great flexibility in the calculation methods and resulting figures. The final figures appear to be significantly inflated putting more land and residents under threat from development than are needed.

The 2014 SHMA used is out of date and inflates the housing need figures. It has been replaced by an updated version in 2018 (Objectively Assessed Need), which is more realistic and should be used in preference. Section 4.20 of the Publication Version (January 2019) of the South Oxfordshire Local Plan 2011-2034 (LP) states “the SHMA is based on 2011 “interim” household projections, and so the base data on which it is grounded is now quite dated”

In the Inspector’s question 7.a. it states “The standard method based on 2014 household projections points to a starting point for housing need in South Oxfordshire of 627 dwellings per annum. (Housing Topic Paper 2.27 and 2.28)”, which was confirmed by SODC.

Paragraph 4.16 of the Local Plan states – “the NPPF and Planning Practice Guidance direct Local Planning Authorities to use the “standard method” to establish the minimum local housing need figure. For South Oxfordshire this results in an annual housing need of **556** homes a year.”

Paragraph 4.22 states – “In South Oxfordshire, the evidence considers that the provision of 750 dwellings a year would support economic growth”.

Paragraph 4.23 states – the SHMA made recommendations in terms of the housing range that the Local Plan should seek to achieve, this range is shown as between 14,500 and 16,500 homes for South Oxfordshire (over the twenty year plan period 2011-2031). This equates to an annual provision of between 725-825 new homes. The 100,000-home target of the Oxfordshire Housing and Growth Deal is based on the midpoint of this range (**775 homes a year**). However, the basis of the figure of 100,000 homes in the Oxfordshire Growth Deal is itself questionable.

Paragraph 5.8 states “the Plan already made provision for around 15,700 new homes through the rolling forward of allocations in our adopted core Strategy and the Local Plan 2011, the commitments in made neighbourhood Development Plans and the granting of planning permissions. around 4,400 of these committed new homes have been built since 2011.”

In terms of annual numbers there is a range of housing need calculations from 556 to 775 with little evidence to choose between them. Similarly, one Growth Deal calculation is apparently derived by subtracting Growth Deal commitments from all the Oxfordshire LGAs and taking what is left as SODC's portion (paragraph 2.28 of the SODC Housing Topic Paper 2019), which is not considered an acceptable calculation method. The table below summarises 2 possible calculation methods for housing need and uses the main figures show in the main Local Plan document 5.5.

| <b>HOUSING NUMBERS SODC LOCAL PLAN</b>  |             |               |
|---|-------------|---------------|
|   | <b>p.a.</b> | <b>Total</b>  |
| <b>SODC's own need over 23 years (1st April 2011 - 31st March 2034)</b>   |             |               |
| Latest Government calculation   |             |               |
| Gives two alternatives  | 556         | 12,788        |
|   | 627         | 14,421        |
| <b>With Growth Deal</b>   | 775         | 17,825        |
| Share of Oxford's unmet housing need over 10 years<br>(the Government's calculation method gives close to zero) |             |               |
| <b>With the Growth Deal SODC has now accepted</b>   | 495         | 4,950         |
| <b>TOTAL</b>  |             | <b>22,775</b> |
| The SODC Local Plan provides  |             | 28,465        |
| <b>EXCESS PROVISION OF DWELLINGS</b>  |             | <b>5,690</b>  |

The total figure is derived from the table below (paragraph 5.11 of the Local Plan 2034 – page 86).

5.11 The various sources of the housing supply for the Local Plan are summarised on Table 5c below.

Table 5c: Expected sources of housing supply

| Supply of new homes to come forward   | Net number of dwellings to 2034 |
|---|---------------------------------|
| <b>Committed components of housing supply</b>   | <b>15,726</b>                   |
| <b>Completions</b> (1 April 2011 to 31 March 2018)  | 4,364                           |
| <b>Commitments</b> (as at 30 September 2018)  |                                 |
| Sites under construction, with planning permission and allocations carried forward from the Local Plan 2011 and Core Strategy | 11,362                          |
| <b>New components of housing supply in this Local Plan</b>  | <b>12,739</b>                   |
| New strategic allocations delivering in the plan period *   | 10,375                          |
| Outstanding market town allocations to be made through Neighbourhood Development Plans  | 519                             |
| Outstanding larger village allocations to be made through Neighbourhood Development Plans                                     | 499                             |
| Nettlebed allocations   | 46                              |
| Windfall allowance  | 1,300                           |
| <b>Total</b>  | <b>28,465</b>                   |

The housing figures appear to have been inflated by 5,690 homes and should be reduced by this amount to the established 'need' number of 22,775. At this figure there will be some flexibility as the figure is inflated due to the use of out of date inflated SHMA figures and different calculation methods. A total figure of 17,738 (556 p.a. plus Oxford) would also be just as valid, although this does not account for the Growth Deal, which has a questionable basis.

The total housing numbers to meet Oxford's 'unmet' housing need have been reduced at Examination – see c. below by 2,264 homes, so a reduction of this amount should be included, in the new strategic allocations figure for SODC.

### Concluding Comments

The method of calculation for housing need figures seems confusing and appears to include an additional 5,690 dwellings over the plan period, which is not required to meet South Oxfordshire's housing need, nor its portion of Oxford's 'unmet' housing need, nor the Oxfordshire Growth Deal.

The Oxford City unmet housing need was reduced in the Inspectors final report by 2,264. As all other Oxfordshire Local Authorities have an up-to-date local plan or are at an advanced stage, this reduced need should be reflected in the SODC housing figures. Reducing the number to 20,511 over the plan period

### ***Issue b. What are the implications of extending the plan period as proposed?***

It may help to ensure that the strategic site at Chalgrove can be delivered.

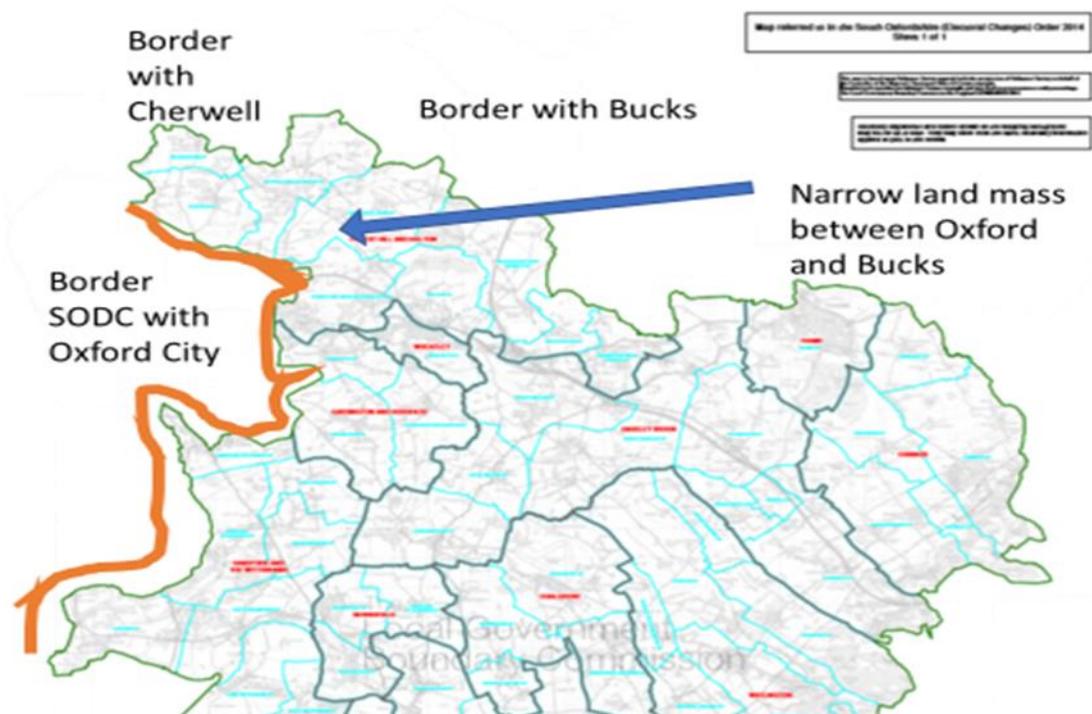
**Issue c. Is there an appropriate component within the stated housing requirement for meeting the unmet needs arising from Oxford City, having regard to the findings of the Inspector's report into the submitted Oxford City Local Plan? What should that figure be?**

The recent Examination of the Oxford City Local Plan reduced its 'unmet' housing need as greater provision has been made for housing within Oxford. The provision within Oxford has been raised from 8,620 to 10,884 (with a stepped trajectory). This should mean a reduction of 2,264 homes to be exported to SODC.

SODC had received an unfair proportion of Oxford City's 'unmet' housing need as it has a long boundary with Oxford City as shown on the map below (Figure 1.). This is despite the fact that the boundary with Oxford City is to the east and south of Oxford, but there is very little SODC land to the east of Oxford between Oxford and the boundary with Buckinghamshire. This puts extra ordinary pressure on the villages in this part of the District.

The proportion of Oxford's 'unmet' housing need that should be removed from SODC's share is the full 2,264 homes. This is because –

- SODC was given an unfair portion in the first place as it has a long boundary with Oxford (even though this is not considered a fair way to apportion the 'unmet' need which should be based on land area by district.)
- The Local Plans for Cherwell, Oxford, Vale of White Horse and West Oxford have already been 'adopted' and so cannot be altered.



**Fig 1. Map of northern part of SODC area showing borders with Oxford, Bucks and**

***Issue e. To conclude, and leaving aside (for the moment) the stepped trajectory, what average annual figure should constitute the housing requirement, and what would that figure be over the plan period?***

This housing figure should be the defined need ranging from 17,738 to 22,775 minus the reduction in Oxford's 'unmet' housing need i.e. a total of 15,474 to an absolute maximum of 20,511 over the Plan period. This would allow all the proposed allocation sites contained in the Green Belt around Oxford to be dropped.

To conclude the annual housing requirements should be between 673 and 892

Providing a total provision of between 15,474 and 20,511 over the 2011 – 2034 Plan period.