

South Oxfordshire Local Plan 2034

Publication Version

Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent Business or organisation Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text"/>	<input type="text" value="Mr"/>
Full Name	<input type="text"/>	<input type="text" value="Brian Flynn"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Croudace Homes Ltd"/>	<input type="text" value="Carter Jonas LLP"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="One Station Square"/>
Address Line 2	<input type="text" value="The Spirella Building"/>	<input type="text"/>
Address Line 3	<input type="text" value="Bridge Road"/>	<input type="text"/>
Postal Town	<input type="text" value="Letchworth, Hertfordshire"/>	<input type="text" value="Cambridge"/>
Postcode	<input type="text" value="SG6 4ET"/>	<input type="text" value="CB1 2GA"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
Email Address	<input type="text"/>	<input type="text" value="████████████████████"/>

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

Policy STRAT 2

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Policy STRAT2 of the Final Publication version of the South Oxfordshire Local Plan 2034 (FPSOLP2034) includes the housing requirements during the plan period. The overall housing target for the period 2011 to 2034 is 22,775 dwellings, comprising 17,825 dwellings (775 dwellings per annum) to meet South Oxfordshire's housing needs and 4,950 dwellings (495 dwellings per annum between 2021 and 2034) to address Oxford's contribution to the Oxfordshire Housing & Growth Deal.

It is noted that the housing requirement included to meet Oxford's unmet needs is the figure previously contained in the Memorandum of Co-operation on Meeting the Objectively Assessed Need for Housing in Oxfordshire (September 2016); it is not clear whether South Oxfordshire District Council has signed the Memorandum of Co-operation.

The Council has published a Housing Topic Paper to provide background information and evidence to support Policy STRAT2.

It should be noted that FPSOLP2034 will be examined against the National Planning Policy Framework 2018 (NPPF2) and the associated Planning Practice Guidance (PPG), and as such the housing target in Policy STRAT2 will need to be consistent with the standard methodology for calculating local housing needs.

In summary, Croudace Homes objects to the proposed housing target contained in Policy STRAT 2 for the following reasons:

- The standard methodology for calculating local housing needs only provides the minimum starting point for determining housing needs in an area, and further uplifts need to be assessed;
- The proposed housing target has not assessed uplifts to take into account growth strategies, strategic infrastructure improvements, unmet needs from neighbouring authorities using the standard methodology, and previous delivery levels as required in the 'When might a higher figure than the standard method need to be considered?' section of the PPG (Paragraph 010 (Id: 2a))

- The proposed housing target has not assessed whether the housing target should be increased to deliver more affordable housing as required in the ‘How is the total annual need for affordable housing calculated?’ section of the PPG (Paragraph 027 (Id: 2a)).

Paragraph 59 of NPPF2 sets out the Government’s objective to significantly boost the supply of housing. Paragraph 60 expects the standard methodology for calculating local housing needs to be used to determine the minimum number of housing needed, and that unmet needs from neighbouring authorities are also taken into account in establishing a housing target. Section Id: 2a of the PPG provides guidance on housing needs assessment using the standard methodology, and identifies circumstances where an uplift should be considered.

In summary, as explained in the Council’s Housing Topic Paper, the proposed housing target in FPSOLP2034 is based on the standard methodology using the 2014-based household projections, with reference to the findings of the 2014 Strategic Housing Market Assessment, the Oxfordshire Housing & Growth Deal, Growth Deal funded infrastructure projects, unmet needs from Oxford, and past delivery rates. The proposed housing target in FPSOLP2034 is identical to the preferred housing target derived from the SHMA 2014 i.e. 775 dwellings per annum.

The ‘When might a higher figure than the standard method need to be considered?’ section of the PPG (Paragraph 010 (Id: 2a)) indicates that uplifts to the standard methodology should be assessed to take into account growth strategies, strategic infrastructure improvements, unmet needs from neighbouring authorities using the standard methodology, previous delivery levels, and recent strategic housing market assessments.

It is considered that the proposed housing target does not adequately assess the circumstances where an uplift may be required. Firstly, it is noted that the SHMA 2014 was prepared 5 years ago, and the data that has informed the assessment is out of date, and therefore any analysis of housing need that is based on the findings cannot be robust. Secondly, the Oxfordshire Housing & Growth Deal of 100,000 dwellings is based on the preferred objectively assessed housing need figure derived from the SHMA 2014, which as set out above is out of date, and in any event effectively seek to deliver identified housing needs rather than ‘growth’. Thirdly, the economic impacts associated with East West Rail and the Oxford to Cambridge Expressway have not been considered in the assessment of whether an uplift is required. Fourthly, the quantum of unmet needs from Oxford are based on the findings of the SHMA 2014 and not on an assessment using the standard methodology for calculating local housing needs as required in the PPG.

Therefore, the proposed housing target is inconsistent with national guidance and is unsound.

The proposed housing target in FPSOLP2034 has also not considered whether an uplift should be made for affordable housing. The ‘How is the total annual need for affordable housing calculated?’ section of the PPG (Paragraph 027 (Id: 2a)) states:

“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” [our emphasis]

There is no evidence in the Housing Topic Paper that the required assessment as to whether there should be a further uplift for affordable housing has been undertaken. It is considered that there are a number of factors that justify an assessment of affordable housing on this matter, and a further uplift to the housing target.

It is concluded at Table 90 of the SHMA 2014 that 965 dwellings per annum would meet affordable housing needs in full within South Oxfordshire; it is acknowledged that the SHMA 2014 is out of date, but no more recent figure has been provided in the evidence for FPSOLP2034.

Policy H9 of FPSOLP204 has a target of 40% affordable housing on sites to meet the needs of South Oxfordshire. The housing target to meeting South Oxfordshire's local housing needs is 17,825, and if 40% of the local housing need is delivered as affordable housing this equates to 7,130 affordable dwellings being delivered during the plan period or 310 dwellings per annum.

Table 9 in the Council's Annual Monitoring Report 2017/18 provides details of annual affordable housing delivery rates since 2011/12, which are as follows: 194 for 2011/12; 143 for 2012/13; 187 for 2013/14; 114 for 2014/15; 180 for 2015/16; 172 for 2016/17; and, 259 for 2017/18. It is clear that there has been a significant under-delivery of affordable housing compared with what needs to be delivered to achieve the 40% affordable housing target specified in Policy H9.

It is noted that all of the strategic allocations in FPSOLP2034 – Policy STRAT7, STRAT9, STRAT10, STRAT11, STRAT 12 and STRAT13 – all require significant levels of infrastructure to be provided including new highway infrastructure. The Infrastructure Delivery Plan Update January 2019 does not identify the costs associated with these transport infrastructure projects and improvements, but it is considered that the costs associated with these projects will be significant. It is expected in the policies for these strategic allocations that policy compliant levels of affordable housing will be provided. However, there is no evidence that the costs of providing these transport infrastructure projects will not affect the viability of the proposed strategic allocations and undermine the delivery of policy compliant levels of affordable housing. Therefore, it is very likely that less affordable housing will be delivered from the strategic allocations than currently predicted.

The Housing Affordability in England & Wales 2017 data shows that the affordability ratio for South Oxfordshire is 10.19, which demonstrates a clear problem with affordability in South Oxfordshire and significant differences between house prices and average earnings.

Therefore, there is a strong case for the housing target to be increased to address housing affordability.

If the housing need figure derived from the SHMA 2014 that would meet affordable housing needs in full was used in FPSOLP2034 i.e. 965 dwellings per annum, the housing target for South Oxfordshire would be 22,195 dwellings between 2011 and 2034; an increase of 4,370 dwellings. The unmet needs for Oxford would need to be added to this figure.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

It is requested that the proposed housing target in Policy STRAT2 includes an assessment of uplifts to take into account growth strategies, strategic infrastructure improvements, unmet needs from neighbouring authorities using the standard methodology, and previous delivery levels as required in Paragraph 010 (Id: 2a) of the PPG.

It is requested that the proposed housing target in Policy STRAT2 includes an assessment as to whether the housing target should be increased to deliver more affordable housing as required in Paragraph 027 (Id: 2a) of the PPG.

It is suggested that in the absence of any other up to date evidence, the local housing target for South Oxfordshire should be increased to 22,195 dwellings between 2011 and 2034, which equates to 965 dwellings per annum to meet affordable housing needs in full as derived from the SHMA 2014.

(Continue on page 4 if necessary)

Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:

(this can be electronic)

Date:

18/02/19

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit

www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk.