

Oxford Local Plan 2036 Examination document: Impact of base date on unmet need

This document addresses action number 8 and was raised at the Matter 2 hearing session:

Add the Oxford Local Plan 2036 to the library and the Oxford City Council accompanying OAN update note that was part of the Examination

This document contains a copy of a submission Oxford City Council made to the examination of their Local Plan 2036.

Explanatory note to submission

Oxford City Council prepared this note “Impact of base date on unmet need” to support their Local Plan 2036 examination. This sets out two options for how rebasing the plan period to 2016 (previously 2011) would impact on their unmet need, and the existing agreements for accommodating that in neighbouring council areas.

The summary at paragraph 15 confirms that the Local Plan 2036 took the approach outlined in option 1; i.e. rebasing the need of the plan period from 2016, and running to 2036. The housing need for the Oxford Local Plan 2036, and therefore the associated unmet need accommodated in neighbouring councils covers the period 2016 to 2036, not 2031.

**Impact of base date on
unmet need**

SUB.1

Impact of the base and end dates of the Oxford Local Plan 2036 on the levels of unmet need

1. Neighbouring authorities have previously queried the impact of pursuing the later base date on unmet need in their responses to the Regulation 19 consultation and the Inspectors' Matters and Questions. As confirmed by Vale of White Horse District Council at the hearing session on Matter 1 that took place on 3rd December 2019, this had subsequently been resolved with them. This note was requested at the hearing session by the Inspectors to set out the explanation given. This note therefore sets out the City Council's explanation of how the two base dates affect the levels of unmet need agreed in the Oxfordshire authorities Statement of Common Ground (COM.3) and the Oxfordshire Memorandum of Understanding (GDL.13).

Requirement to extend the plan period to 2036

2. Paragraph 22 of the NPPF (2019) requires strategic policies to look ahead over a minimum 15 year period. Oxford City Council expects to adopt the Local Plan in the monitoring year 2020/21. The plan therefore covers the period to 2035/36.
3. It should be noted that regardless of the impact on unmet need, the Oxfordshire Housing and Growth Deal Delivery Plan (GDL.2) requires the council to undertake an appropriate update to its housing needs assessment to support the figures in the growth deal (Page 13). Consequently, without such an update, the reliance on the Growth Deal as an exceptional circumstance for deviating from the standard method could be undermined.

Option 1 - housing need update with base date of 2016 (approach taken)

4. The City Council commissioned GL Hearn to provide an update to the SHMA 2014 known as the 2018 update (HOU.5). This rebases housing needs from 2016 to 2036 using the same general approach as the SHMA 2014.
5. This assessment concludes that the housing needs for the 20 year period 2016 to 2036 is 28,000 or 1,400 per annum, which is consistent with the outcome of the SHMA 2014 but over a different plan period.
6. The unallocated need in this approach is smaller than that assumed in the original apportionment of unmet needs. In 2016, when the Memorandum of Understanding was signed¹, the assumed unallocated need was 3,150 homes. This is because, at that time, the capacity of Oxford had been assumed to be 10,000 with 550 homes allocated back to the city (GDL.13 and COM.3).

¹ South Oxfordshire did not sign the Memorandum of Cooperation although this figure is now incorporated within the Submission South Oxfordshire Local Plan 2034

Table 1: Outcome of update of needs for period 2016 to 2036

2016 base date		
A	Oxford housing need 2016-2036 (Oxford SHMA update, 2018)	28,000
B	Working assumption of unmet need apportioned 2021-2031 (COM.3 and GDL.13)	14,300
C	Capacity based requirement in draft Oxford Local Plan 2016-2036 (as set out in PSD.3)	10,884
D	Remaining unallocated housing need	2,816

Option 2 – extend the 2011-2031 period to 2036 without a housing needs update

7. This would base a plan on the period covered in the SHMA 2014 (HOU.3), which only covers the period 2011 to 2031, and so the plan would need to consider how it identifies housing need for the last five years.
8. The City council believes there would only be two reasonable options for this; either rolling forward the 1,400 homes per annum from the SHMA 2014 for an additional five years, or, reverting to using the standard method for the last five years – 746 homes per annum.
9. These homes would be in addition to the 28,000 homes set out in the SHMA 2014 to meet the needs of Oxford from 2011 to 2031.
10. This approach would therefore add an additional need of between 7,000 homes (based on rolling forward the SHMA 2014 for 5 years) or 3,730 homes (adding the minimum standard method for 5 years).
11. As set out in OCC.1B, the housing completions between 2011 and 2015 were 1,428 homes. The capacity of the city between 2016 and 2036 is set out in PSD.3 at 10,884 and is subject to examination.
12. Netting the completions and capacity off of the need under this approach would result in unallocated housing needs arising from Oxford of between 5,118 and 8,388 homes.

Table 2: Outcome of 2011 to 2036 plan period

2011-base date scenarios		
A	Oxford Housing need 2011-2031 (SHMA 2014, HOU.3)	28000
B	Oxford Housing need 2031-2036 - Standard method (5 x 746)	3730
C	Oxford Housing need 2031-2036 – SHMA 2014 (5 x 1,400)	7000
D	Working assumption allocated to neighbours 2021-2031 (COM.3 and GDL.13)	14300
E	Oxford housing completions 2011 to 2015 (OCC.1B)	1428
F	Oxford capacity based housing requirement to 2016-2036 (as set out in PSD.3)	10884
G	Remaining unallocated housing need Either (A+B) - (D+E+F) or (A+C) – (D+E+F)	5118-8388

13. This increases the unallocated housing needs in Option 1 (2,186 homes) by 2,302 -5,572 homes.
14. The City Council considers that this approach could be subject to challenge in terms of soundness given the impact on unmet housing needs without an updated evidence base to cover the period to 2036. There are also challenges with reverting to a standard method for the final 5 years of the plan. The City Council do not consider there would be clear evidence to justify reverting to a minimum figure for the final 5 years.

Summary

15. The City Council considers the approach taken in the draft Oxford Local Plan 2036 (Option 1), as proposed to be amended through PSD.3, to be sound and justified by proportionate evidence of housing need for the whole plan period. .