

## **Examination into the Oxford Local Plan 2036**

### **IC9 - Inspectors' interim conclusions**

We are writing to set out in brief our interim conclusions on some of the key issues arising in the examination into the Oxford Local Plan 2036, principally in respect of the housing requirement and overall housing need. We feel that clarifying the position at this stage would assist the City Council and those neighbouring authorities, residents and stakeholders who are interested in the planning issues arising in the city and region. It should be emphasised that these are our interim conclusions; our final report will be published in due course after we have considered all the representations made in response to the consultation on the Main Modifications.

Housing need, housing capacity and housing provision, and their various components, formed the basis of detailed discussion in the first week of the Examination hearings which took place from 3 December to 17 December 2019. We should like to thank the Council and, through this letter, all the participants, for their helpful and well-researched contributions to the hearings.

On the subject of housing need, it is our preliminary view that no main modifications are required in respect of the plan's assessments of overall housing need or affordable housing need, or in respect of the annual need figure of 1,400 dwellings per annum over the plan period from 2016 to 2036 which is referred to in section 3 of the plan. This figure is based on substantial and sound evidence and on tried and tested methodologies which accord with Government guidance. The approach is justified in the context of the circumstances which include serious unaffordability in the housing market and unusually marked inequalities in the city.

The plan's overall housing need figure is aimed at meeting the very substantial level of affordable housing need. Affordable housing need has been properly calculated within an up-to-date SHMA update (2018) (HOU.5) in accordance with government guidance and takes into account all relevant inputs and appropriate adjustments. There is an agreed approach with neighbouring districts in respect of growth and the accommodation of unmet need which addresses the question of delivery. We have come to the interim conclusion that the scale of the overall housing need and the other significant factors, which we will detail in our final report, constitute exceptional circumstances for the release of Green Belt to accommodate the identified housing need.

In terms of the housing requirement, in other words the amount of housing to be accommodated within Oxford itself over the plan period, the submitted plan's housing requirement was 8,620 dwellings from 2016 to 2036 but the Council have proposed a modification to Policy H1, as set out in its statement on Matter 4, which provides an updated figure and establishes the total housing requirement at a minimum of 10,884 dwellings from 2016 to 2036 within the city's boundaries. Our view at this stage is that this proposed main modification is required to make the plan sound, and also that the stepped trajectory as proposed to be modified is realistic and should ensure the maintenance of a rolling 5 year supply of housing land.

We have looked at the wider implications of this modification and the issues arising from the different time periods in the submitted plan compared with those used by the assumptions of the Oxford Growth Board. The Board's assumptions, and hence the working figure used by other LPAs, was 10,000 dwellings in Oxford from 2011 to 2031. The calculations in the Council's paper OCC.1B seek to resolve the issues raised by the different time periods. Adding completions between 2011 and 2015 to the annualised capacity-based housing requirement for 2016-2031 gives a figure of 9,588 dwellings for 2011 to 2031, ie the period on which the Growth Board's figures are based. This is very close to the Growth Board's assumed capacity figure for Oxford of 10,000 dwellings.

We have therefore come to the preliminary conclusion that the calculation of overall housing need set out in the Plan and supporting documents is sound and that the annualised figure of need established in the plan, taken together with the capacity-based housing requirement as proposed to be modified, and the known rate of completions from 2011 to 2015, do not give rise to any meaningfully different implications for planning in the wider Oxfordshire area compared with the assumptions used by the Growth Board, and do not raise any significant new issues in respect of the unmet need set out and discussed in paragraphs 3.10 to 3.12 of the submitted plan.

We discussed in the hearings the need for the Council to maximise opportunities to deliver housing within the city and especially on brownfield land in accordance with the NPPF. Clearly the Council need to ensure that urban land is brought forward where possible, and during discussion at the

hearings it proposed a main modification which would add minimum housing numbers to the site allocations. This would create certainty for all concerned and would give assurance that a certain minimum number of homes can be achieved, with the potential for higher levels of delivery subject to compliance with plan policies. The Council also proposed a main modification which will allow for complementary uses to the designated uses on the allocated sites to ensure that the plan is positively-prepared and enables site allocations to be developed flexibly but in acceptable ways. We consider that these proposed main modifications are required for soundness.

Throughout the examination we have borne in mind the imperative of providing housing and affordable housing, and this has led us generally to find sound the proposed balance of land uses in the plan and support the individual site allocations, subject to certain main modifications which have been discussed with the Council. We do not need to go through all of those modifications in this letter; they have already been included in the Council's preliminary modifications schedule which is on the website. We would however draw attention to the main modification that followed discussions in writing, where we recommended the Council remove the requirement to make affordable housing contributions on sites of less than 10 homes to ensure that the plan is sound and in accordance with national policy, and the Council subsequently proposed this modification.

We believe it is right for the plan to continue to exercise careful management over the locations for student housing and employer-linked affordable housing so as, among other things, not to impair the delivery of housing to meet wider needs. And in the interests of helping to meet affordable housing needs, and to deliver a balance of types of housing, we also consider it right as a general principle for the plan to seek affordable housing contributions from the development of student accommodation over the threshold size. But we consider that a main modification is required exempting the development of certain forms of student accommodation on campus and university redevelopment sites from those contributions, in recognition of the onus to provide for additional student accommodation which is specifically placed on the universities by the effect of the Policy H9 cap. The Council have put forward a main modification to this end.

Whilst some of these main modifications are intended to create opportunities for boosting the supply of housing from within Oxford in accordance with the NPPF, their overall effect will be essentially to bolster the supply of windfalls and potentially, by introducing some flexibility, to add to the anticipated housing numbers on certain allocated sites. In other words they are important in reinforcing the robustness of the plan's housing delivery and its resilience in meeting its 5 year housing land supply, but on the evidence we believe that they are very unlikely to be of a scale to make a significant difference to the level of the city's unmet need for housing that cannot be accommodated within its boundaries and needs to be accommodated by Oxford's neighbours.

On non-housing matters, we have had extensive discussions in writing on a range of policies prior to the hearings, a number of which have given rise to suggested main modifications. These include, for example, modifications to the employment, transport and heritage policies in response to our earlier written questions. These will be included in the finalised Schedule of Main Modifications in due course and we do not intend to go into them here. The reasons behind them are all documented and are on the examination website, in correspondence between ourselves and the Council.

Our assessment of the evidence base, plan preparation and plan contents have led us to conclude that the plan meets the requirements for legal compliance, and we have not found it necessary to devote hearing sessions to this subject.

Finally, the Schedule of Main Modifications will be published and will be subject to consultation in due course, and we will consider the results of that consultation before reaching conclusions in our final report.

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Inspectors