South Oxfordshire Emerging Local Plan 2011-2034

Summary and call for action
South Oxfordshire Local Plan 2011-2034

The South Oxfordshire Local Plan is open for final public consultation before going to the planning inspector for approval

This is the last opportunity for public comment

Comments must be received at the latest by 5pm 18th February

South Oxfordshire is part of the Oxfordshire Housing and Growth Deal, along with the other district and county councils in Oxfordshire. In return for a payment of £150m to spend on infrastructure, Oxfordshire has committed to plan for 100,000 new homes in Oxfordshire over the period 2011-2031. To put this in context, there are currently 285,750 homes in Oxfordshire in total

South Oxfordshire has committed to build 22,775 homes, far in excess of need, in order to meet the requirements of the Growth Deal. The Plan goes even further than this, proposing sites that will allow the building of 28,465 new homes. Currently there are 58,720 homes in South Oxfordshire, so this is a nearly 50% increase

The proposed Oxford-Cambridge Expressway may add another 200,000 to Oxfordshire’s total
Why so many – how South Oxfordshire developed the housing NEED

Local Authorities have to establish minimum local housing need using the Government’s ‘Standard Method’ - this gives a figure of 556 homes per annum for South Oxfordshire, 12,788 over the plan period (2011-2034)

However in 2014 a Strategic Housing Market Assessment (SHMA) was conducted for Oxfordshire, looking at housing required for projected economic growth – this gave a figure of 775 homes per annum, a total of 17,825 over the plan period

Oxford City Council signalled it could not meet its own housing need and SODC consider they can take an extra 4,950 homes in South Oxfordshire to help Oxford City meets its targets, a total of 22,775
The Oxfordshire Housing and Growth Deal

South Oxfordshire is part of the Oxfordshire Housing and Growth Deal – in return for building 100,000 homes, Oxfordshire receives £150m from the Government to spend on infrastructure between all Oxfordshire councils – a drop in the ocean in comparison to the infrastructure needed.

However by signing up to the Housing and Growth Deal, SODC is able to build far in excess of housing need as this is given as a reason for increasing building by the NPPF (National Planning Policy Framework).
### SODC Local Plan 2011-20134 Housing NEED and Housing SUPPLY

<table>
<thead>
<tr>
<th>NEED figures</th>
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<tbody>
<tr>
<td>Government 'Standard Method' based on ONS 2016 figures: 556 homes/year x 23 years</td>
<td>12,788</td>
</tr>
<tr>
<td>SODC have chosen not to follow the 'Standard Method' but continue to use the old and widely discredited 2014 SHMA on which the 'Oxfordshire Growth Deal' is based This gives a requirement of 775 homes/year x 23 years</td>
<td>17,825</td>
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<tr>
<td>A contribution to Oxford City’s ‘assumed unmet need’ (Local Plan 4.26) of 15,000 homes</td>
<td>4,950</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>22,775</strong></td>
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<th>SUPPLY figures Table 5c Local Plan)</th>
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<tr>
<td>Committed components of housing supply</td>
<td>15,726</td>
</tr>
<tr>
<td>Completions (1st April 2011 - 31st March 2018)</td>
<td>4,364</td>
</tr>
<tr>
<td>Commitments as at 30th September 2018</td>
<td>11,362</td>
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<tr>
<td>(sites under construction, with planning permission and allocations carried forward from the Local Plan 2011)</td>
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<tr>
<td>New Components of housing supply in this Local Plan</td>
<td>12,739</td>
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<tr>
<td>New strategic allocations delivering in the plan period</td>
<td>10,375</td>
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<tr>
<td>Outstanding market town allocations to be made through Neighbourhood Plans</td>
<td>519</td>
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<tr>
<td>Outstanding larger village allocations to be made through Neighbourhood Plans</td>
<td>499</td>
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<tr>
<td>Nettlebed allocations</td>
<td>46</td>
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<tr>
<td>Windfall allowance</td>
<td>1,300</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>28,465</strong></td>
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The estimated **NEED** for housing over the period 2011-2034 based on an economic aspiration rather than demographic factors is **22,775 homes**.

The allocated supply however is **5,690** over this **NEED** which is already inflated.

*Figures Local Plan Table 5c*
Problems

Providing land to meet this inflated housing need has meant large incursions into the Green Belt at 6 sites – a total of 8,350 homes built on Green Belt land by 2034, and a further 3,050 after the plan period.

These housing numbers are not based on need:

‘commitment to deliver higher than our local housing needs’ (Local Plan 4.18)

‘the Growth Deal itself is not an assessment of housing need’ (Local Plan 4.19)

The data used is out of date:

‘the deal derives its aspirational housing targets from the Oxfordshire SHMA............based on 2011 “interim” household projections........the base data on which it is grounded is now quite dated’ (Local Plan 4.20)
The methodology has been superseded by new guidelines:

‘The SHMA is based on a methodology for working out housing needs that was set out in the first NPPF (2012) and original Planning Practice Guidance’ (Local Plan 4.2)

(This is what the new NPPF(2018) says about determining the minimum number of homes needed.... ‘strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach’ NPPF (2018) 60 pg 17)

However, despite its shortcomings, the Oxfordshire SHMA (2014) is used as the only evidenced justification for the housing numbers put forward (Local Plan 4.21)
What about the Oxford City Need?

Consultants GL Hearn conducted an update of the Objectively Assessed Need (OAN) calculations for Oxford City in Oct 2018.

This updated report based on new ONS figures and revised Planning Practice Guidelines finds that demand has fallen:

‘the latest household projections..............superseded the 2014 based projections and resulted in a substantially reduced number’

‘The SHMA report (2014) identified a baseline demographic growth of 744 homes per annum (compared to 543 homes per annum identified in this report 2018)’
This sums it up!

“In the current policy context this is not the Objectively Assessed Need but a choice for the local authority to make in order to meet the requirements of the housing and growth deal” (Oxford City – OAN Update for Oxford City Council 9.58)

It should be noted that the supply figure proposed within the emerging Local Plan far exceeds the need figure, to allow for flexibility and choice (South Oxfordshire Local Plan Sustainability Appraisal pg 148)

- In other words we are losing large areas of Green Belt and urbanising the countryside not because we need the homes for people to live in, but as a political choice .................
The Real Housing Market in South Oxfordshire

Between 2001-2011 population and households grew in tandem in South Oxfordshire – an average growth of 200 households housing an extra 610 people per annum.

Between 2011-2018 the Local Plan shows that on average 623 dwellings were completed per annum – 3 times more than the household formation rate observed 2001-2011.

Permission was granted for an extra 2920 dwellings which were not completed – suggesting insufficient demand.

Conclusion – the current rate of house building is keeping up with the actual demand on the ground.
Local Plan Proposals

• Rather than planning for the South Oxfordshire housing need of 12,788 dwellings – 556 homes per annum, close to the observed historic rate of 623 homes per annum, the Local Plan proposes to deliver 22,775 homes – almost doubling the numbers we actually need.

• The allowance for the City of Oxford unmet need has already been undermined by new data showing households growing more slowly.

We are destroying the Green Belt and countryside, not for need but as a deliberate political decision to urbanise South Oxfordshire.
What we want

- To build housing for the actual need – 556 homes per annum
  - as evidenced from the government methodology and observed trends

- Ensure a good supply of affordable and social housing

- An immediate review of Green Belt strategic sites and of strategic allocations in the Green Belt no longer needed

- A more effective strategy to bring empty houses back into use
  - The Oxford Mail reported in November 2016 that there were 4,400 empty homes in Oxfordshire including 505 in Oxford City

‘Calls for higher tax rates to tackle the growing problem of empty homes’ Oxford Mail 2nd December 2016
What you can do

1. Respond to the Consultation as an individual or a group

This is the most pressing thing you can do. A link to the form is given overleaf together with links to the Local Plan and other supporting documents. The more responses the louder the voice of dissent.

The response form asks you if you wish to give oral evidence at the examination. Please say ‘yes’ – you can always change your mind later if you do not want to speak after all, but if you say ‘no’ you will not be able to speak. The examination is not an inquisition and the more people that state their objections the weaker the case becomes. At the very least we show that there is substantial opposition to the Plan.

Although the overall case is presented in this document, localising and tailoring to the site/area you know is well worthwhile. You may, for instance, like to include photographs of building sites blighted when building starts but then abandoned when the developer cannot sell the homes, or nature or traffic concerns.

It is also worthwhile to object to specific policies as well as the overall plan. The more objections to a specific policy, the weaker it becomes.

Closing date is 5pm 18th February
What you can do

2. Write to your MP/Planning Minister

   This signals concern and as the Plan is politically, not need, driven they need to know that many people do not want it. There might also be a general election soon!

3. Write to your district and county councillors

   They are meant to represent you

4. Contact and work with other groups in the district

   SOS acts as a central point and co-ordination. Ways to get in contact are given overleaf.
Links and support

The Local Plan and supporting documents including the response form can be found here:


The Oxfordshire SHMA can be found here:


The OAN update with the latest figures for Oxford City is here:


Please do contact us on:-
urgentsoscampaign@gmail.com

Join our google group - urgentososcampaign by emailing:-
urgentsoscampaign@gmail.com and we will add you, instructions overleaf

Our website:- Web site - http://southoxfordshiresustainability.org.uk

Facebook:- South Oxfordshire Sustainability

Twitter:- @sos_south