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**Corporate Director: Bill Cotton**

**Environment and Place**

**27th March 2022**

Planning Policy

Oxford City Council

By email: planningpolicy@oxford.gov.uk

Dear Planning Policy

**Public Consultation on Housing Need for Oxford Local Plan 2040**

**Closing date 27th March 2023**

Please see our response on the Housing Need Consultation attached. The consultation document relates to a new evidence document, namely the Housing and Economic Needs Assessment prepared by consultants Cambridge Econometrics.

These comments build on those we provided in November 2022 on the Preferred Options and in August 2021 on the Issues consultation and should be viewed in conjunction with those comments.

Two other evidence documents have been published now: the Green Belt Assessment of additional sites and the Character Assessment of Oxford in its landscape setting. The consultation does not ask for comments on those documents.

We look forward to continued involvement as the process progresses. We understand that your current timetable is:

* Regulation 19 in November to December 2023;
* Submission in March 2024; and
* Adoption by summer 2025.

Yours sincerely

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**OXFORDSHIRE COUNTY COUNCIL RESPONSE ON**

**OXFORD CITY COUNCIL HOUSING NEED CONSULTATION**

**(REGULATION 18)**

**THE OXFORD LOCAL PLAN 2040**

**Closing 27th March 2023**

**Introduction**

1. The County Council’s previous responses during this ‘Regulation 18’ stage of developing the Local Plan have addressed housing need matters. Some excerpts from our last response in November 2022 are copied below and are to be considered part of this response.
   1. Addressing housing need is a fundamental role for the Local Plan. The County Council has been consistent in urging the City Council to respond to the challenge – giving priority to housing on development sites and ensuring that land is used efficiently, for example through higher densities than has historically been the case. It is important that the local plan recognises that some housing will in future be located where it has not traditionally been located (for example as some employment uses vacate) and sets policies to ensure that healthy new places are established.
   2. The amount of future housing expected is a key matter for the Local Plan. The City Council is intending a further consultation on housing need in early 2023, so we expect that the use of a capacity-based figure or some other figure will be considered further at that time. We note that the City Council has assessed the capacity as 9,147 dwellings over the plan period between 2020 and 2040. This figure will be tested throughout the plan process. Paragraph 2.6 on page 27 indicates that if the 9,147 figure is used, this will mean a lower housing requirement than even the lowest possible housing need determined using the Standard Method. 9,147 houses over 20 years equals about 457 houses per year. The Background Paper #1 indicates that this relates to 114 sites and a windfall assumption of 127 houses per year. The Authority Monitoring Report 2020/2021 indicates that during that year 743 dwellings net were completed. That figure of 743 was identified applying new student and care home ratios from the Housing Delivery Test rule book as there were 320 market dwellings, 144 affordable dwellings, 712 student rooms and -11 care home rooms completed. The total completions over the five years 2016-2021 were 2,691 – an average of 538 per year. The current Local Plan has a stepped trajectory of 475 dwellings per annum between 2016/17 to 2020/21 and 567 dwellings per annum between 2021/22 and 2035/36, however the average per year of, 544, is very close to the 538 achieved over the first five years of the plan period. 9,147 houses over the 20 years 2020-2040 would be less than that previously envisaged for the 20 years 2016-2036, which totalled 10,880, and the next consultation should clearly set out the numbers and detail the reasons such as whether landowners are now not seeking to redevelop their sites and why.
   3. The districts surrounding Oxford have already provided for Oxford’s unmet need during the last Local Plan process, for periods of up to 2035. More transparent figures are needed in the next consultation stage in early 2023 as to what is already being provided over what period. It is recognised that the preferred options document attempts to identify the housing being provided in the districts to meet the unmet needs in paragraph 8.5 and Figure 8.2 and 8.3 of the document, however those figures might be misleading, and some joint statements of common ground with the Districts are needed in respect of how housing from each site is to be counted. For example, the capacities noted for a number of the sites simply follow their allocation amounts, but it is not clear what happens if the developers build more than that number – could those additional houses be calculated as meeting more of Oxford’s unmet need? In the case of Vale of White Horse and West Oxfordshire, the capacities noted do not follow the allocation amounts, and it is not clear which houses from the identified sites are addressing the unmet need, and again, whether further housing on those sites might be calculated for Oxford’s unmet need beyond their current plan periods. In the case of South Oxfordshire, it is not clear whether the capacities of those sites given, which totals 5,900, are actually agreed as addressing Oxford’s unmet need as the current South Oxfordshire local plan refers only to providing for 4,950 homes of Oxford’s unmet need over the period to 2035.
   4. The County Council has an interest in understanding the calculations of housing need as, if Oxford’s need cannot be met within its boundaries or within the numbers on already allocated sites near its boundaries, there might be an increase in development further afield, making it more difficult to have 15 or 20 minute neighbourhoods and leading to increased commuting and a need for further transport infrastructure and interventions.
   5. There is currently an acute shortage of one bed properties at social and affordable rent. These are needed for people of all ages currently living in supported accommodation. The lack of opportunity to move into suitable properties of their own, when they no longer need the support, limits the availability of supported accommodation for others who need it. More one-bedroom properties will also allow more opportunities for down-sizing given the ageing population.
   6. We note that the pressure on social housing is phenomenal. The County Council is involved in respect of its social care role. The County Council thinks that additional affordable extra care housing will be needed either in Oxford City or in the sites immediately adjoining in the Districts and our housing development team within our adult social care directorate will be seeking to review its evidence to quantify the need. The County Council also seeks that the local plan provides for varying needs - an example is kinship foster carers, who take on children of relatives who are unable to live with their parents and can end up in overcrowded conditions. Lack of adequate housing is also a factor in preventing parents from being reunited with their children after downsizing due to children being removed.
   7. We welcome the proposal for a policy that is more specific on the requirements for wheelchair accessible dwellings amongst the affordable housing component. We would also like to see wheelchair accessible dwellings amongst a proportion of the market homes. Providing for such will help provide for some people who would otherwise require extra care housing or residential care.
2. The housing need consultation document refers to the 9,147 figure for capacity 2020-2040 as per the HELAA provided at the last consultation stage, which equals about 457 dwellings per annum (dpa). It indicates that a stepped trajectory might be proposed, whereby a greater number of homes are required in some years of the plan than others.
3. New to this consultation is an assessment of the housing need by Cambridge Econometrics. The conclusion of the Housing and Economic Need Assessment is that the housing need for the city is some 26,440 dwellings 2020-2040, based on a figure of 1,322 dpa multiplied by 20 years. This is the key focus of the questions at this consultation stage.

**Housing Need Scenarios Across Oxfordshire**

**Q1**-Are there other ways of identifying housing need that should have been considered?

**Q2**-Do you have any comments on the methodologies used in the HENA?

**Q3**-Do you have any other comments on the Scenarios?

**Q4**-Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

1. The consultation document identifies that the NPPF requires a local housing needs assessment which should be conducted using the government’s Standard Method unless exceptional circumstances justify an alternative approach.
2. The Standard Method is one of four scenarios explored in the HENA. The second is a Census-adjusted Standard Method, the third a Cambridge Econometrics baseline trend scenario, and the fourth an Economic Development-led scenario. Of these, the Standard Method shows the lowest need figure for the whole of Oxfordshire; the two in the middle are similar at 30% to 40% higher; and the last is about 70% higher. We have collated the figures and compared them in Table 1 below:

Table 1 – Oxfordshire Housing Need Figures

|  |  |  |  |
| --- | --- | --- | --- |
|  | Dwellings per annum | 2020-2040 total (dpa x 20 years) | Comparison |
| Standard Method | 3,388 | 67,760 | 100% |
| Census-adjusted Standard Method | 4,721 | 94,420 | 140% |
| Cambridge Econometrics baseline trend | 4,406 | 88,120 | 130% |
| Economic Development-led | 5,830 | 116,600 | 172% |

1. The consultation document explains (para 2.6) that the calculations of housing need are made at an Oxfordshire level because Oxfordshire operates as a Functional Economic Market Area and Housing Market Area. However, the HENA was commissioned by only two of the Councils in Oxfordshire (Oxford City and Cherwell District) and although all the Councils have historically worked together cooperatively, with the demise of the Oxfordshire Plan 2050, this is not an agreed evidence document between the relevant authorities. Ideally evidence would be jointly commissioned by all authorities so that methodologies and scenarios could be agreed.
2. The chosen scenario in the consultation document is the Cambridge Econometrics baseline trend scenario. The City Council has not chosen the lowest Standard Method scenario on the basis that it is based on inaccurate 2014 projections; nor the highest Economic Development scenario as it involves uncertain levels of development. Out of the two middle scenarios, the Cambridge Econometrics baseline trend scenario is favoured over the Census-adjusted Standard Method because the census releases are not complete.
3. Last year, in 2021, an Oxfordshire Growth Needs Assessment (OGNA) was produced to help with the production of an Oxfordshire Plan 2050 by the same consultants. The three scenarios used at that stage were the Standard Method, ‘Business as Usual’, and ‘Transformational’. We have collated the figures and compared them in our Table 2. The differences noted in Table 2 indicate that the HENA is producing higher figures than the OGNA. There was no agreement between the five councils on what housing scenarios to use for the Oxfordshire Plan 2050 and there was a lot of concern voiced by the public over high projections. A decision was made not to proceed with the Oxfordshire Plan 2050 in August 2022.

Table 2 – 2021 OGNA compared to 2022 HENA

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| OGNA | Standard Method  3,386 |  | Business as Usual  4,113 | Transformational  5,093 |
| HENA | Standard Method  3,388 | Census-adjusted Standard Method  4,721 | Cambridge Econometrics baseline trend  4,406 | Economic Development  5,830 |
| Comparison | +2 |  | +293 | +737 |

1. Government guidance suggests the Standard Method unless there are exceptional circumstances, and in this case the Standard Method produces the lowest figures of any of the scenarios identified. It may be that scenarios with lower figures than the Standard Method could have been identified if there are exceptional circumstances. Our concerns are set out below in answer to Q8. We seek ongoing discussion with the City and Districts on these matters.

**Choice of Distribution Figure for Oxford City**

**Q5**-Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

1. The consultation document favours apportioning the Oxfordshire numbers by district by relating the housing numbers to existing and future employment. The results are shown in Table 3. This leads to a figure of 1,322 dpa being the assessed need for housing in Oxford City i.e. 26,440 dwellings 2020-2040.

Table 3 – Distribution of District Housing Need by Distribution of Employment in 2040

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | | Housing Need Scenario | | | |
| CE Baseline Trend Employment Based Distribution Projected (2040) Distribution | | Standard Method | Census-Adjusted Standard Method | Cambridge Econometrics Baseline Trend | Economic Development Led |
| Oxfordshire | 100% | 3,388 | 4,721 | 4,406 | 5,830 |
| Cherwell | 22.9% | 776 | 1,081 | 1,009 | 1,335 |
| Oxford City | 30% | 1,016 | 1,416 | **1,322** | 1,749 |
| South Oxfordshire | 18% | 610 | 850 | 793 | 1,049 |
| Vale of White Horse | 16.2% | 549 | 765 | 714 | 944 |
| West Oxfordshire | 12.8% | 434 | 604 | 564 | 746 |

1. Cherwell District Council used this HENA for the report to their Overview and Scrutiny Committee on 11th January 2023 and Executive on 19th January 2023. The recommendation was to also use the Cambridge Econometrics baseline trend figure and distribution above leading to 1,009 dpa as per Table 3, however a decision was deferred. It is possible that all five councils will adopt different approaches.
2. At this stage we are not convinced about the proposal that housing growth should be based on which district the jobs are expected to be in: this may be too simplistic, and not relate to the potential to travel sustainably with regard to the existence of infrastructure such as railway lines and secondary schools, and ignore other constraints. We seek that any distribution be reflective of the need to promote development patterns that support the Oxfordshire Local Transport and Connectivity Plan (LTCP) and other relevant policies.
3. We understand that the Standard Method would result in the figures in Table 4. This shows a figure of 762 dpa for Oxford City i.e. 15,240 dwellings 2020-2040.

Table 4 – Distribution of District Housing Need by 2014 based Standard Method

|  |  |  |
| --- | --- | --- |
| 2014 Based Standard Method Distribution | | Standard Method |
| Oxfordshire | 100% | 3,388 |
| Cherwell | 21.9% | 742 |
| Oxford City | 22.5% | 762 |
| South Oxfordshire | 18.9% | 641 |
| Vale of White Horse | 19.5% | 661 |
| West Oxfordshire | 17.2% | 582 |

1. We are concerned at the implications from choosing firstly a scenario with higher figures than the Standard Method, then a distribution which deviates from the Standard Method and results in higher figures of need for Oxford City than other options. Further comments are set out below in answer to Q8.

**Specialist and Affordable Housing**

**Q6-**Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

1. The document indicates a high need for affordable housing. Given the high need, it is not a determining factor of the total requirement. If the assessed full need for affordable housing was required on development sites, then private development would likely be unviable. The amount of affordable housing needed has not kept pace with need in recent decades due to the way it is funded, in fact it has declined in England overall (see [Shelter’s Social Housing Deficit webpage](https://england.shelter.org.uk/support_us/campaigns/social_housing_deficit)).
2. There is also a high need for one and two-bedroom properties indicated, especially in the affordable housing sector. As stated in our response to the last consultation (copied in 1-e above) the County Council is supportive of providing for more one and two-bedroom dwellings to provide for those moving out of supported accommodation and for residents who are down-sizing.
3. In respect of older and disabled persons housing need, the assessment is that there remains a significant future need. However, the consultation document indicates that there is more than enough ‘housing with support’ in Cherwell and Oxford City, but the quality of the stock is not known. Relatively small numbers of ‘housing with care’ and ‘care bedspaces’ are identified as being needed in these two authorities. The County Council has waited to see this HENA in advance of commissioning its own research into future social care needs. The County Council has an existing [market position statement](https://www.oxfordshire.gov.uk/sites/default/files/file/adult-social-and-health-care/OxfordshireMPS2019-22.pdf) and [extra care housing supplement](https://www.oxfordshire.gov.uk/sites/default/files/file/adult-social-and-health-care/MPS2019-22_0.pdf), but it is recognised that the timeframe in those documents is only to 2031. A meeting was held with staff at the city and districts in December 2022 to discuss the brief for evidence. We would like to have further meetings to discuss the need and opportunity for various forms of housing catering for those with specialist needs, particularly extra care housing, prior to the Reg 19 local plan being finalised. In the meantime, we do not accept the figures in the HENA as correctly reflecting the scale of affordable need in respect of those forms of housing that Oxfordshire County Council has a key interest in. In particular, we have queries about how some existing schemes are classified and note that if either existing housing specifications and/or housing provider priorities do not align with what we consider is required for modern extra care housing, this will result in a higher number of new extra care housing units being needed.

**Capacity for housing within Oxford’s boundaries**

**Q7**-Do you have any comments about the assessment of housing capacity?

1. This consultation does not provide any change in the figures from the preferred options consultation in respect of the identified capacity in Oxford City from the HELAA published at that stage. The assessed capacity is 9,147 dwellings over the 20 years (457 per year). There is a new Green Belt Assessment of additional sites, but the conclusion of that is that there is no case to take further land out of the Green Belt within Oxford City, so no further sites have been added.
2. We made comments in our last November 2022 response about capacity issues as copied at paragraphs 1a and 1b above, as well as some more detailed comments on the HELAA.
3. We have reviewed the latest 2021-2022 Authority Monitoring Report which was not available when we sent our response on the last consultation. As set out in paragraph 1b above, the previous five monitoring reports had pointed to an average of 544 homes being completed per year. The latest monitoring report amends some previous figures while adding the latest year, and the six years 2016-2022 show an average of 537 homes being completed each year. This is considerably less than the need figure options in the Housing and Economic Needs Assessment.
4. Our overall impression is that there may yet be other opportunities for additional sites or greater density, and it may be that a higher windfall allowance would be justified.
5. We understand that City Council officers are further considering the HELAA in relation to the comments made and the allocations and policies that are being drafted for the forthcoming Regulation 19 Local Plan. We encourage the city’s officers to identify further opportunities for more housing in a revision of the HELAA to accompany the Regulation 19 Local Plan. Continuing to build housing in Oxford City will help to meet sustainability targets such as enabling more people to make active travel choices, reducing carbon emissions and avoiding the need for costly new transport infrastructure.

**Requirement for Oxford City and Unmet Need outside of Oxford City**

**Q8**-Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?

1. This consultation document indicates that Oxford City Council proposes to identify that the city’s housing need is for a total of 26,440 houses between 2020 and 2040 (1,322 dpa), but that the requirement within Oxford City’s boundaries be for 9,147 dwellings (457 dpa or possibly a stepped trajectory) or whatever figure results from a revised HELAA.
2. The Standard Method would produce need figures of 15,240 houses between 2020-2040 (762 dpa), which would be a lot closer to the proposed requirement of 9,147 dwellings (457 dpa), and potentially closer if the HELAA identifies an increase in capacity.
3. A key concern is the difference between the identified need and the requirement within the City’s boundaries. This creates an identified ‘unmet need’ and appears as an obligation for the other district councils to address that need. If there was a lower need figure and a lower distribution percentage for Oxford, then the unmet need figure would be lower. We would like to be confident that whatever figure of unmet need is agreed with the District Councils, that it is realistic and achievable.
4. The unmet need resulting from using the 1,322 dpa and 457 dpa figures is 865 dpa (i.e. 1,322 minus 457). Over the 20 years 2020-2040 this is 17,293 dwellings (i.e. 26,440 minus 9,147).    The Standard Method produces an unmet need (with the current HELAA) of 6,100 dwellings. The working assumption of unmet need identified for the period 2011-2031 was for 15,000 dwellings, and 14,300 was allocated in the current Local Plans. Table 5 shows how this was distributed. The distribution was arrived at based on an assessment of suitable and available sites at the time.

Table 5 – Apportionment of Oxford’s unmet need in current Local Plans to 2035/2036

|  |  |  |
| --- | --- | --- |
| District | Apportionment of unmet need | Percentage of 14,300 total |
| Cherwell | 4,400 | 31% |
| South Oxfordshire | 4,950 | 35% |
| Vale of White Horse | 2,200 | 15% |
| West Oxfordshire | 2,750 | 19% |
| Total | 14,300 | 100% |

1. We understand that very few houses have since 2011 been built on sites identified as addressing Oxford’s unmet need. In Cherwell District, none of the 4,400 houses have yet been built (these are separately identified in their February 2023 [Housing Land Supply Statement](https://www.cherwell.gov.uk/info/33/planning-policy/370/monitoring-reports/3)).
2. This consultation document states: ‘Most if not all of the proportion of unmet need implied by the need figure compared to the estimated capacity is likely to have been already provided for in existing allocations in neighbouring Council’s local plans. This will depend on the deliverability of those sites, and the quantum of housing and timescales for delivery, which is a matter for the relevant Local Planning Authority.’  As stated in our response to the previous consultation (paragraph 1-c above) we seek a clear table of how many houses are to be provided over what timeframe from which existing District Council allocations.
3. Cherwell District Council’s 11th January and 19th January 2023 papers contained a proposal that Cherwell District Council provide for 5,667 dwellings between 2020 and 2040 to be identified as helping address Oxford’s unmet need (equivalent to 283 per year, in addition to their own assessed need). That document indicates that Cherwell has already made provision for 4,400 homes through its Local Plan Partial Review adopted in 2020 and, as none of those have been completed yet and the allocations are proposed to be saved, they will be counted, together with a further 1,267 homes ‘elsewhere in Cherwell’, ‘that are accessible to Oxford, including for example at Bicester’. No specific sites (other than those from the Partial Review) were proposed to be identified in the Cherwell Local Plan 2040. We presume that the figure identified for Cherwell is based on using the 2040 employment distribution with an appropriate increase, something like that shown in Table 6. This is only a guess, but the table seeks to extrapolate what that might mean for other District Councils should a total of 4,406 dpa be apportioned using this distribution.

Table 6 – Possible Distribution Implication with Unmet Need

|  |  |  |  |
| --- | --- | --- | --- |
| CE Baseline Trend Employment Based Distribution Projected (2040) Distribution | | Cambridge Econometrics Baseline Trend | Cambridge Econometrics Baseline Trend with proportions of 865 dpa unmet need equally increased |
| Oxfordshire | 100% | 4,406 | 100%= 4,406 |
| Cherwell | 22.9% | 1,009 | approx 29% = 1,292 |
| Oxford City | 30% | 1,322 | approx 10% = 457 |
| South Oxfordshire | 18% | 793 | approx 24% = 1,057 |
| Vale of White Horse | 16.2% | 714 | approx 20% = 881 |
| West Oxfordshire | 12.8% | 564 | approx 16% = 705 |

1. At the moment, some sites outside of Oxford have a requirement for affordable housing which is the same as that in Oxford City i.e. 50%. We have listed those we are aware of in Table 7. In the January 2023 Cherwell papers, the recommendation was to maintain a commitment to deliver 50% affordable homes to address Oxford’s unmet need by simply agreeing that an additional 633 new affordable homes in the district (i.e. 50% of 1,267) would be for Oxford’s unmet need and Cherwell District Council would use the same mechanism for allocating 633 affordable homes in Cherwell for Oxford City as for the Partial Review Plan allocation sites. This appears to be a practical response to the issue, but Cherwell District Council would need to identify affordable homes on more sites given that the development requirement will likely be for less than 50% on sites other than those allocated in the Partial Review Plan and those houses then won’t be available for other local needs. Given that a decision was not made in January, we do not know whether such an arrangement would be politically acceptable in Cherwell District, and whether such an approach would be followed by other Councils.

Table 7 – Sites with a 50% requirement for affordable housing outside of Oxford City

|  |  |
| --- | --- |
| Site | District Council |
| South of Grenoble Road STRAT11 | SODC |
| Northfield STRAT12 | SODC |
| North of Bayswater Brook STRAT13 | SODC |
| PR6a Water Eaton | CDC |
| PR6b Golf Course | CDC |
| PR7a Kidlington | CDC |
| PR7b Kidlington | CDC |
| PR8 Begbroke | CDC |
| PR9 Yarnton | CDC |
| High value zone sites | WODC |

1. The government is proposing changes to the National Planning Policy Framework. The County Council has responded to the consultation, which closed on 2nd March 2023, and we will provide the City Council with a copy of our response. The government’s consultation is relevant as it addresses some of the same issues as this housing need consultation, for example the government proposes to make changes ‘designed to support local authorities to set local housing requirements that respond to demographic and affordability pressures while being realistic given local constraints’. The government’s consultation goes on to say that they ‘propose to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method, such as … university towns with an above-average proportion of students’ which would appear to apply to Oxford. The County Council’s response generally supports the changes on plan-making and housing supply but notes the critical role of strategic planning on macro issues such as climate change, infrastructure provision and the environment which often need to be considered across large geographical areas.
2. We would like to see more focus within Oxford City on making best use of land opportunities, which means (as stated in our last consultation response) giving priority to housing on development sites and ensuring that land is used efficiently, for example through higher densities than has historically been the case. Where there is an agreed unmet need for Oxford City, we would like to see whether that need can be addressed on already allocated sites close to the city in the first instance. We are concerned if figures are generated identifying an unmet need for Oxford City and that is added to the District Councils’ housing requirements without identifying which sites are addressing that unmet need and how the relevant proportion of affordable housing will be identified.
3. Oxfordshire County Council’s particular interests are in seeking enough housing to meet specialist needs, in accordance with our social care functions; and influencing the location of development to make the most of existing infrastructure and minimise the cost of new infrastructure. We also have a strategic interest, for example in respect of climate change, flood resilience, and the natural environment. Our recent publications, such as the Local Transport and Connectivity Plan, and Oxfordshire’s Environmental Principles, indicate that it is important to holistically consider housing need in order to work towards a greener, fairer and healthier county. The County Council will therefore seek ongoing discussion and continue to be involved in the progress of the local plans on these matters.

**Summary**

**Q1**-Are there other ways of identifying housing need that should have been considered?

**Q2**-Do you have any comments on the methodologies used in the HENA?

**Q3**-Do you have any other comments on the Scenarios?

**Q4**-Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

1. Government guidance suggests using the Standard Method unless there are exceptional circumstances. The Standard Method produces the lowest figures of any of the scenarios identified. We seek ongoing discussion with the City and Districts on these matters.

**Q5**-Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

1. The proposed choice of a distribution figure is based on employment in 2040, therefore in locations where there will be more employment there will be a higher figure of housing need identified. The proposed choice has Oxford at 30% of the housing need across Oxfordshire; Cherwell 22.9%, South Oxfordshire 18%, Vale of White Horse 16.2% and West Oxfordshire 12.8%. Given the tight city boundaries, such a distribution creates a high level of unmet need. We are not convinced this is the best approach and seek ongoing discussion with the City and Districts on this matter.

**Q6-**Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

1. We recognise the high need for affordable housing. We support recognition of the need for more small units in relation to County Council functions such as providing for those moving out of supported accommodation. We would like to further discuss the need and opportunity for various forms of housing that the County Council provides, catering for those with specialist needs, particularly extra care housing, prior to the Reg 19 local plan being finalised. We will be undertaking further research on the need for extra care housing having regard to the evidence in this HENA, and the final results will need to be reflected in the Reg 19 local plan.

**Q7**-Do you have any comments about the assessment of housing capacity?

1. We encourage the city’s officers to identify further opportunities for more housing in a revision of the HELAA to accompany the Regulation 19 Local Plan.

**Q8**-Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?

1. The proposed combination of scenario and method of distribution leads to a higher level of unmet need than the Standard Method. Although the City Council has stated that most of the unmet need for 2020 to 2040 is likely to have been already provided for in existing allocations in the Districts’ Local Plans, those figures and the sites identified to date need to be clarified, along with an understanding that what is proposed is realistic and achievable. It is also necessary to be clear on how the affordable housing will be apportioned. The County Council has an ongoing interest in these matters not just in relation to our social care and transport functions, but also our wider strategic interests in working towards a greener, fairer and healthier county. We seek to be involved in discussions and that there be agreement between the City and District Councils on the extent of Oxford’s needs and unmet needs.