

**To:** Cabinet  
**Date:** 12 August 2020  
**Report of:** Head of Planning Services  
**Title of Report:** Oxford Housing Delivery Test Action Plan 2020

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	To present the Action Plan for continuing to support and improve housing delivery in Oxford.
<b>Key decision:</b>	Yes
<b>Cabinet Member:</b>	Councillor Alex Hollingsworth, Cabinet Member for Planning and Housing Delivery
<b>Corporate Priority:</b>	Deliver more affordable housing
<b>Policy Framework:</b>	Oxford Local Plan 2036 and National Planning Policy Framework
<b>Recommendation:</b> That Cabinet resolves to:	
1. <b>Approve</b> the Oxford Housing Delivery Test Action Plan 2020	
<b>Appendices</b>	
Appendix 1	Oxford Housing Delivery Test Action Plan 2020

## Introduction and background

1. The Oxford Housing Delivery Test Action Plan seeks to explore what the key risks to housing delivery in the city are and looks to identify a range of actions that seek to reduce that risk and indeed seek to improve levels of housing delivery in Oxford.
2. Paragraph 75 of the NPPF states that to maintain the supply of housing, local planning authorities should monitor progress in building out sites that have permission. Where the Housing Delivery Test (HDT) indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an Action Plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.

3. The Housing Delivery Test Rulebook<sup>1</sup> provides the Council with the guidance for working out its results. When setting the requirement for the past three years, if a Council doesn't have an up-to-date plan in place (i.e. it is less than 5 years' old), then the rulebook directs them to use the minimum local housing need figure; often the "standard method" for working out housing need set out in the NPPF. However, as the standard method has only been in place since 2018, and HDTs currently look back further than this, the guidebook directs a council to use household projections from MHCLG for years before 2018/19. When the HDT was undertaken in November 2019, the Oxford Core Strategy was more than 5 years old, and so Oxford's test was affected by this. The table below explains the various "targets" identified in the HDT rulebook.

**Table 1: Housing Delivery Test results and forecasts**

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Target	Household Projections	Household Projections	Standard Method	Standard Method or Local Plan	Local Plan	Local Plan
	375	529	743	746 or 475 <sup>▲</sup>	475	567
Completions / (projections)	435	373	343*	(786)	(777)	(544)
Three year target	-	-	1,647	2,018 or 1,479	1,964 or 1,425	1,788 or 1,517
Three year completions	-	-	1151	1,502	1,906	2,107
Actual and Expected HDT Result	-	-	70%	74% or 102%	97% or 134%	118% or 139%

<sup>▲</sup> It is currently unclear whether the November 2020 measurement will apply the standard method or the newly adopted Local Plan requirement. Interim conclusions from the Inspectors were received in January 2020 confirming the approach to a stepped trajectory and housing requirement were considered sound but the final Inspectors' report was received in May 2020 and the Local Plan was adopted in June 2020.

\* Oxford City Council monitoring report includes 351 completions for 2018/19, which would have still resulted in a result of 70%. MHCLG appear to have used a different figure from the housing flow reconciliation.

4. For the years following the adoption of the Local Plan the HDT results will be measured against the housing requirement in the plan of 475 homes per annum from to 2020/21, increasing to 567 homes per annum from 2021/22 to 2035/36. As set out in the table above there remains some uncertainty about whether the

<sup>1</sup> <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

Local Plan requirement will apply for 2019/20 or whether the standard method will apply. Officers will be seeking clarification of this with the Ministry of Housing, Communities and Local Government.

5. Regardless of the national requirements around the HDT the Council is committed to ensure we deliver our housing requirements and boost affordable housing in the city given the acute need. This is considered increasingly important given the wider factors now impacting relating to the coronavirus pandemic. Therefore, this Action Plan is the first of a series of Action Plans that will be published each year as part of our monitoring work. If our HDT result exceeds 95%, we will still conduct this assessment.
6. Furthermore, the programme of work that feeds into the HDT features frequent meetings and information gathering. We will be constantly monitoring the actions in this plan, and if new information suggests the actions change, we will consider publishing an update to the Action Plan before the next annual publication.

### **Summary of key aspects of the Oxford Housing Delivery Test Action Plan**

7. The Council recognises that it needs to take a proactive approach to monitoring development sites if it is going to better understand housing delivery and ensure local targets are met. The Council's approach in the past has been robust, with a large monitoring report produced annually assessing the supply of housing. However, engaging with site promoters once per year only provided a snapshot of issues often at a point in the year that issues were identified at a point where we were unable to take action. The first step in our Action Plan was therefore to establish a methodology for improving our engagement with the following key stakeholders:
  - Site promoters and developers in our housing trajectory
  - Oxfordshire County Council
  - Utilities and other infrastructure providers
  - Landowners who may wish to bring previously unknown land forward for development
  - Planning and property agents
  - Our own Councillors
  - Members of the public
8. Having received the Housing Delivery Test results in February 2020, officers began establishing a programme of work in early 2020. This included many face to face meetings and forums that have not been implemented due to the Coronavirus restrictions. The Action Plan also explains what work has been completed so far. This is set out in Section 3 of the Housing Delivery Test Action Plan and the summary table is included below.

**Table 2: Programme of engagement and progress to date**

Engagement	Explanation	Status
Agents and developers forum	Quarterly meetings held between the City Council and active agents in the city. Allows us to explain work we are doing, as well as canvassing opinion on city-wide actions to boost delivery, and taking suggestions from attendees. This forum is intended for officers to also challenge site promoters, recognising that the City Council is not solely responsible for housing delivery.	First held 6 March 2020 Paused due to Coronavirus
Infrastructure Forum	Quarterly meetings held between the City Council and infrastructure / utility providers in the city. Allows us to explain work we are doing, as well as canvassing opinion on city-wide actions to boost delivery. As work progresses, officers intend to hold themed meetings so that not all infrastructure providers need to attend every meeting. None of these forums have been organised.	No meetings held, paused due to Coronavirus
Monthly site information requests	Creation of a new interactive database (Smartsheets) – this sends monthly update requests to all site promoters of major development sites asking a series of questions relating to housing delivery, and asks them to confirm their expected trajectory for the site. The questions asked in this update are given in <b>Appendix 1</b> . Uptake on this has been low, with only 4 site promoters responding since May 2020. Further “softer” engagement of the automatic update request is therefore required – through site promoter meetings, pre-application discussions, other meetings etc.	Commenced – ongoing monitoring of participation required
Site Promoter Meetings	These launched in June 2020. We ask developers a series of questions pertaining to housing delivery on their site. These questions have been written based on officers reviews of HDT Action Plans published last year by other authorities, the NPPG and officer experience of criticisms of housing delivery evidence at local plan examinations and Section 78 Planning Appeal inquiries.	Commenced – next tranche of meetings to be arranged
Housing Supply Group	These are monthly meetings held between senior officers responsible for housing delivery / planning across Oxford. Officers’ feedback to this meeting on the progress of other elements of this work, and will share initial / emerging ideas for how to boost housing delivery in Oxford.	Commenced and ongoing
Member workshops	Quarterly or six monthly meetings to brief Councillors on the housing supply information received, and to advise on Officers’ thoughts on actions to take in response.	Not commenced – paused due to Coronavirus
Drop in Call for Sites	Set up a monthly / fortnightly day where members of the public / developers / agents can book a one hour slot for some high level advice on development sites. These sites must not already be in our trajectory. This will help us identify any potential deliverable windfall sites, and provide potential developers with the confidence to begin formal engagement with the Council.	Not commenced – paused due to Coronavirus

9. From the work so far engaging with key site promoter and stakeholders we have identified several topics that we will focus upon to try and support housing delivery

in the city. Each topic contains specific actions. Many of the identified actions are areas where work has already begun and will be continued and enhanced to support housing delivery.

10. Although the requirement for this Action Plan is rooted in the planning system, problems affecting housing delivery extend far beyond this. The Action Plan identifies several actions that are focussed on the planning stages to continue to do all we can to provide a streamlined approach. However, these actions are only likely to result in minor improvements to delivery compared to other interventions.
11. The work to date and feedback from site promoters in Oxford did not identify issues with planning as a risk to delivery. Many highlighted macro issues outside of planning. Most of these actions will extend beyond the functions of a local authority as most relate to ownership of land, supply of materials and labour. The Council does own land and has a housing company to deliver new housing and so where relevant, we have identified more direct, proactive actions to delivering new homes. In addition, the City Council will continue to do what it can to promote the need for infrastructure investment and seek to secure external funding as it has in the past. For example, funding was successfully secured from the Housing Infrastructure Fund for Oxford North, Osney Mead and Blackbird Leys. The City Council also has itself taken on a delivery role for some growth deal funded infrastructure for example a new pedestrian/cycle bridge at Osney.
12. Further consideration and detail around the Council's influencing role and in addressing other macro issues will continue to be refined with the intention that in the next Action Plan we will be able to give more detail of the progress and opportunities in this area.
13. A summary of the key actions and progress to date is summarised in the table below.

**Table 3: Summary of key actions contained within the HDT Action Plan**

Topic No.	Action / topic	Progress
1	Improve quality and frequency of engagement with site promoters to inform monitoring of housing sites – (implementation of the methodology section)	Comprehensive engagement process commenced. Some work on hold due to coronavirus, moving to digital platforms.
2	Continue implementation of corporate programme for housing delivery	Commenced – Housing Supply Group set up, Cabinet Member for Planning and Housing Delivery Appointed.
3	Continue to drive housing delivery through developing land owned by the Council through joint venture or it is wholly owned housing company	The housing company is expecting to build 709 homes (464 of which will be affordable homes) over the next 5 years through its housing company. The Council is also aiming to develop 79 other affordable units through our HRA account.
4	Continue monitoring of validation of planning applications	A validation strategy has been developed to provide more clarity to developers.
5	Continue programme of service level and	Commenced

Topic No.	Action / topic	Progress
	planning performance agreements	
6	Continue infrastructure planning and delivery programme	The Council is preparing a new CIL Charging Schedule and Infrastructure Funding Statement to meet the requirements of the regulations. In addition to this we will also continue to support the County Council for external funding bids such as the Housing Infrastructure Fund (HIF) and the Active Travel Fund
7	Continue to reduce pre-commencement conditions and triggers	Ongoing
8	Work with the Oxfordshire County Council to align processes	We will continue to work with the county to identify a way for larger schemes to incorporate their services into our PPA/SLA approach.
9	Provide additional policy advice for the new Local Plan 2036	The Council has recently published its Local Development Scheme (LDS) (July 2020) committing to a programme of technical advice notes and supplementary planning documents.
10	Councillor engagement	Commenced – further rollout affected by coronavirus
11	Market demand and impact of Coronavirus	Mixed response from site promoters on impact of coronavirus, we will continue to monitor this.  One action is to include advice about ensuring effective pre-application consultation for developments in the upcoming update to the Statement of Community Involvement (SCI) for planning. The Local Development Scheme seeks to consult on a new SCI in Autumn 2020. This will aim to include advice about ensuring effective virtual consultation whilst forms of social distancing and limitations on gatherings remain.
12	Availability of materials and labour	Some site promoters identified shortages in materials and / or labour as a potential issue for delivery.
13	Site promoters' programme of site delivery	Oxford is home to several large institutions with land interests in the City. These institutions will often have their own operational needs, not driven by market demand for new homes.

### Financial implications

14. The Housing Delivery Test Action Plan for this year is a requirement of national policy and therefore is required as part of our statutory obligations as part of the planning system. However, as set out our commitment is that we will continue to undertake the actions and update the plan annually.
15. The actions set out in the Action Plan itself do not have any additional financial implications for the Council. This has and will continue to be resourced from existing planning resource in collaboration with other service areas and the

resources that have already been put in place to support housing delivery in these areas, for example through the housing service and housing company.

**Legal issues**

- 16. As set out above the preparation and publication of the Housing Delivery Test Action Plan is a requirement of the National Planning Policy Framework due to the 2019 measurement falling below 95%. The Council are required to submit the Action Plan to Government 6 months following the release of the HDT measurement. As this was published in February we are required to submit to Government in August.

**Equalities impact**

- 17. There are no equalities impacts arising from this report as the purpose of the Action Plan is to monitor and support the delivery of housing already committed through the Oxford Local Plan 2036 which was subject to its own equalities impact assessment.

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**Background Papers:** None

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