

# Affordable Housing Rebuttal Evidence of Mr Jamie Roberts MPlan MRTPI

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Land East of Ploughley Road, Ambrosden

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Outline planning application for up to 120 dwellings, vehicular and pedestrian access off Ploughley Road, new pedestrian access to West Hawthorn Road, surface water drainage, foul water drainage, landscaping, public open space, biodiversity and associated infrastructure

Land East of Ploughley Road, Ambrosden

Archstone Ambrosden Ltd, Bellway Homes Ltd and Rosemary May

March 2024

PINS REF: APP/C3105/W/23/3327213

LPA REF: 22/02866/OUT and 23/00091/REF

OUR REF: M23/1007-03.RPT

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# Rebuttal Evidence

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- 1.1 This Affordable Housing Rebuttal Evidence has been prepared by **Mr Jamie Roberts MPlan MRTPI of Tetlow King Planning** on behalf of the Appellants, **Archstone Ambrosden Ltd, Bellway Homes Ltd and Rosemary May**.
- 1.2 This short Rebuttal Evidence is submitted in response to the affordable housing matters raised in the Supplementary Planning Proof of Evidence by Mr Tom Webster of Cherwell District Council, dated February 2024.
- 1.3 I do not comment on other matters contained within the Council's Proofs of Evidence but the lack of comment should not be construed as agreement.
- 1.4 Paragraph 1.48 of Mr Webster's Proof of Evidence raises several issues in respect of the affordable housing case:

*"The main thrust of Mr. Jamie Robert's [sic] argument is that the HENA and Oxford Unmet Housing Need should be used to identify the district's affordable housing requirement instead of the Standard Method, which, he suggests, is not an appropriate mechanism to assess the affordable housing need. This is clearly a different view to the NPPF and, whilst, yes, the PR sites will also need to deliver affordable housing, the affordable housing provision on the PR sites is to help Oxford with its shortfall and is in addition to, and therefore, separate to Cherwell's own affordable housing need."*

- 1.5 Through this Rebuttal Evidence, I wish to clarify the approach to Oxford City Council's unmet housing needs, in the context of the Oxfordshire Housing and Economic Needs Assessment 2022 (the "HENA 2022"; **CD J58**).
- 1.6 Essentially, it is important to note that the affordable housing needs for Cherwell identified in the HENA 2022 do not include any element of Oxford City Council's unmet need. The HENA calculates the affordable housing need for each individual authority area and uses specific data inputs for each authority. We can see this throughout the calculation (figures 9.5 to 9.10 at pages 113 to 116 set out each stage of the calculation). The overall figures of 660 affordable rented dwellings per annum at figure 9.11 at page 117, and 193 affordable home ownership dwellings per annum at figure 9.21 at page 124, are calculated specifically for Cherwell and do not account for any reapportionment of any other authority's affordable housing need.

- 1.7 The combined figure of 853 affordable dwellings per annum (660 affordable rented + 196 affordable home ownership) which I take forward for my analysis is specific to Cherwell. I do not rely upon any element of Oxford's unmet housing need in this respect.
- 1.8 That being said, I note that paragraph 1.48 refers to "PR sites" i.e. those identified in the Local Plan Part 1 Partial Review. These are specifically allocated in respect of Oxford City Council's unmet needs and paragraph 5.25 of the Partial Review envisages cross-boundary arrangements between Cherwell and Oxford City Councils for allocating affordable housing on these sites (i.e. they could be used to accommodate households on Oxford's housing register, rather than that of Cherwell). If anything, this underlines the need to secure more affordable housing in Cherwell such as through the appeal scheme, in order to meet Cherwell's housing needs.
- 1.9 Paragraph 1.48 also highlights some peripheral points which I would respectfully disagree with, namely:
- a. the relevance of the Standard Method insofar as affordable housing is concerned – as I explain in paragraphs 5.26 to 5.30 at pages 24 and 24 of my Affordable Housing Appeal Statement, the Standard Method is entirely unrelated to matters of affordable housing. Mr Webster suggests that this is "*clearly a different view*" to the NPPF - but I can find no reference within the NPPF that relates the Standard Method to the affordable housing need.
  - b. whether the HENA forms the "*main thrust*" of my argument – I would disagree with this. It is also vital to consider whether the needs in the SHMA 2014 have been met, given that the SHMA has been tested at examination and forms the evidence for the adopted Local Plan. Similarly, it is important to recognise the importance of affordable housing as a corporate priority of Cherwell District Council (section 4 of my statement) and the affordability indicators which exhibit the 'real world' housing challenges that are households in Cherwell are facing, right now (section 8 of my Statement).
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