

South Oxfordshire Local Plan 2034

Matter 4 - Design & Density

CPRE Oxfordshire Hearing Statement, June 2020

4. Is the plan's approach towards development densities and the design of development sound?

a. Are the residential densities set out in Policy STRAT5 realistic, viable and implementable?

CPRE is wholly supportive of the Council's Policy Strat 5 which we see as an important step towards an appreciation of the positive role that higher density can play in providing the homes people need, both in terms of affordability, social benefits, and climate change resilience (through its very compactness) at the minimum cost in land, our most precious and non-renewable resource. It avoids affordability strategies which penalise one set of buyers to marginally benefit another as all housing would be more accessible if built at appropriate densities. If the Plan densities are to be amended it should be upward, not downward, as the Authority now seems bent on doing through DES 8.

Although promoting higher density has been a key input from CPRE into the 2034 Plan, and our contribution was publicly acknowledged by SODC's then Leader at a Growth Board Meeting chaired by her, we were not the first to raise concern at the downward trend in densities and therefore wastage of land and higher house prices. "Redefining Density" 2015, published by Savills (who will no doubt be attending this Examination) says "higher density is often seen as synonymous with high rise but this is simply not the case. Victorian terraced housing can have a higher density than modern tower blocks. Higher density offers many benefits to local residents by creating the critical mass to support better and more diverse local services and improved social and transport infrastructure."

In "Housing for a Compact City", Jan 2003, Lord Rodgers had written "Even in Central London we are still building at an average density of (only) 78 dwellings per hectare. This is around half the density of the Georgian terraces of Islington and Notting Hill, built 200 years ago, or of contemporary European developments shown in this book".

There are not many people who would find a Georgian terrace unacceptable accommodation.

Ten years before that PPG3 in 1992 said "Local planning authorities should avoid the inefficient use of land. New housing development in England is currently built at an

average of 25 dwellings per hectare but more than half of all new housing is built at less than 20 dwellings per hectare. That represents a level of land take which is historically very high and which can no longer be sustained. Such development is also less likely to sustain local services or public transport, ultimately adding to social exclusion. Local planning authorities should therefore examine critically the standards they apply to new development, particularly with regard to roads, layouts and car parking, to avoid the profligate use of land. Policies which place unduly restrictive ceilings on the amount of housing that can be accommodated on a site, irrespective of its location and the type of housing envisaged or the types of households likely to occupy the housing, should be avoided.

Local planning authorities should therefore:

- **avoid** developments which make inefficient use of land (those of less than 30 dwellings per hectare net - see definitions at Annex C);
- **encourage** housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net); and
- **seek** greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors.

Comparing this with the STRAT 5 densities (as originally submitted) the density of 35 for “other locations” just exceeds the unacceptable minimum of 30 in PPG3. The density target for all locations except the strategic sites is within the 30-50 range encouraged by PPG3. The 70 plus for the “urban edge” sites themselves is within the range sought for such sites by PPG3, although clearly a very long way below the level Lord Rodgers would have found appropriate or the Georgian terraces to which most people would aspire.

That is why we consider STRAT 5 to be a good start towards a proper appreciation of the benefits of higher density rather than an arrival at the destination.

b. Will these densities enable an adequate housing mix to be achieved that will allow the needs of a full range of different households to be met?

Although a mix of property sizes and types pan-District is important, the fact is that most of the District’s existing stock is built at inappropriately low densities. With an active housing market, residents seeking executive style mansions will have no difficulty in finding them, within existing settlements, or close by the new strategic sites.

What is needed is a massive injection of high density, low cost, compact, climate change friendly housing to balance the existing stock, not constraining efficient new development by seeking to impose a standard housing mix on every new development. This is true not just of South Oxfordshire itself but of the sites it is effectively “ceding” to Oxford where they need to be considered in the context of Oxford’s housing mix rather than South Oxfordshire’s. Oxford’s own density targets for “gateway sites” within the City are in the 60-70 range. Oxford’s District Centre targets are for 100-120 dwellings per hectare (dph). Oxford’s need is for higher density housing to balance an overweight of low density stock.

c. Will these densities ensure that local character is protected?

Acknowledging local character is important for development within or adjacent to country towns and villages, in cases where a recognisable local character exists, but large new strategic sites will create their own character or in the case of the City edge sites draw their character from Oxford rather than South Oxfordshire. Where character is used as a reference it should be strictly local character not the imposition of a District wide “model” across all sites.

The most characterful parts of our towns and larger villages are often the compact areas of terraced housing interconnected with a network of access roads and footpaths. Even in the smaller villages, small rows of terraced cottages (originally low cost farm workers’ homes) are an attractive and distinctive feature.

d. Does the plan make adequate provision for best practice urban design and masterplanning on the strategic allocations, including community involvement and design review?

In the sense that urban design is (as the Urban Design Group describes it) *the collaborative and multi-disciplinary process of shaping the physical setting for life in cities, towns and villages; the art of making places; design in an urban context*, we support it. Placemaking is more than architecture. We believe that, especially in an urban context, higher density development is a positive societal and environmental benefit for the reasons Savills described in their publication *Redefining Density* referenced above.