

3.7.14

BY EMAIL ATTACHMENT

Dear Planning Policy Team

SODC LOCAL PLAN 2031 OPTIONS (Issues and Scope)

INTRODUCTION

We believe that the District Council is ill-advised to go forward with planning based on the new SHMA, for the following reasons:

1. The current Core Strategy is only two years old. Oxford City whose CS is the same age see no reason or legal requirement for amendment or review, even though the SHMA's demands of them are the highest of any Authority.
2. The SHMA is clearly flawed and grossly overstated, as evidenced for example by our own Wenban-Smith report. (This has been provided to SODC and is also available from pro@cpreoxon.org.uk.)
3. Accepting the SHMA for new Local Plan purposes means accepting not just the SHMA forecast for South Oxfordshire (on which Issues and Scope is based), but also the enhanced duty to cooperate which Leaders have signed up to.
4. Not only does this "legitimise" the flawed SHMA, but it makes it harder for other Councils to challenge it. We believe it will also create unnecessary Five Year Housing Supply risks as there is no chance at all that builders will deliver these very exaggerated housing numbers.
5. Further, if even half of the City's "shortfall" is required to be accommodated in South Oxfordshire, and we expect the City to target SODC for at least that percentage, this would increase building rates well above those indicated in Issues and Scope, to a rate 1.3 TIMES that in the current Local Plan. This is simply unacceptable and inconsistent with keeping South Oxfordshire the desirable place to live and work which lies at the heart of our actual economic success.

Not only would building on this scale be intensely damaging to the environment and to the amenity of everyone who lives in the District, but is both unrealistic and unnecessary. The draft Strategic Economic Plan presents economic growth as the sole criterion for policy development, when in fact, and for most of us, quality of life and environment is an issue of a far higher order.

Nor are the forecasts of actual housing "need" made on the commonsense basis of people here and needing houses. In fact the largest element of the new forecast, and the difference between it and the present Core Strategy, is more than entirely based on an assumption that 80,000 new jobs will be created in the County (although there is no evidence of how this will be done) and will have to be

filled by incomers to the County needing new houses. As the authors of the new forecast put it themselves, these figures are based on “potential for growth, NOT need or capacity”.

Therefore, whilst we need to consider the “options” for location of development contained in the consultation paper to determine which is the least undesirable, the fact is that they are not really “options” at all, as all of them and more will be needed to deal with the avalanche of development that meeting the Strategic Housing Needs Assessment Forecast would require.

The housing needs forecast itself was signed up for sight unseen by District Councils, including SODC, without any consultation, and it is essential that it is revoked.

Although it is a question the consultation does not ask, the SHMA housing needs forecast is unfit for purpose and should not form the basis for creating such harm to South Oxfordshire.

THE QUESTIONS

1. HOUSING GROWTH AND THE “SHMA”

District Councils across Oxfordshire unwisely committed themselves to accept the new “housing needs” assessment (the SHMA) before it was even commissioned, and without any public consultation, and equally unwisely agreed to find sites for any forecast houses the relevant authority could not accommodate. This goes far beyond the Government’s “Duty to Co-operate” which is a duty to consider but not an obligation to agree. All this has been done in the context of the Local Economic Partnership quango, largely controlled by the City and its development allies, and without any public consultation at all.

The SHMA contains a “housing need” for South Oxfordshire of an average 749 houses a year, 37% higher than in the current Local Plan adopted only two years ago, and which itself imposed draconian housing targets. As stated earlier, given how up to date the Local Plan is, there is no reason to re-open it. However, accommodating this further huge increase is the basis of the “options” in the consultation document.

Far greater even than this is the elephant in the room, hinted at on page 30 but not spelled out, the commitment by District Councils to meet the City Council’s extra housing “needs” as well. The “housing needs” forecast ramps up Oxford City Council’s target from 8,000 to 28,000 houses (a 350% increase) and Oxford says it cannot build 20,000 of them.

They could convert some of their own plans, like the Northern Gateway, from commercial development which increases housing need, to building houses to accommodate it instead, but this would have little effect on the 20,000. They are targeting most of those at South Oxfordshire, and South Oxfordshire, with the other District Councils, has already signed up to take them. Even if we only had to take half, this would add another 10,000 houses to our totals, that is to say another 500 houses a year. Taken with the forecast for South Oxfordshire’s own “housing needs” this would increase housebuilding rates by 130% above the level of the 2012 plan.

To look at the magnitude of that another way, 14,000 new homes would have to be built on top of the 60,000 we have already, a 23% increase in our total housing stock, the average community growing by nearly a quarter in twenty years. Even if this building rate was achievable, and it is beyond any historical experience, it is doubtful whether infrastructure could be expanded at the same rate.

Builders, who are practical business people, would not build up to this incredible hypothetical level of demand, unless there was actual demand, which is unlikely. But because the land would have been allocated, they would only build on the best bits, those most easily developed and sold, which would include the Greenfield and Green Belt sites which we can least afford to lose. Allocating much more land than needed will also exacerbate land-banking risk.

It may be no coincidence of course that much of the Green Belt in South Oxfordshire the City is specifically targeting belongs to the City itself, or its Local Enterprise Partnership quango partners, the Oxford Colleges.

Not only would meeting these forecast figures be unacceptably damaging to our environment and amenity, but it would not bring houses prices down either, as demand is being ratcheted up equally with supply.

THE QUESTIONS

1. The Vision Page 8

- a. The Vision concentrates too heavily on economic growth and not sufficiently on protecting environment and amenity. South Oxfordshire has full employment and present economic success rests on its attractiveness as a place to live and work. It should be made clear that the overriding “mission” is to ensure South Oxfordshire continues to be *a (very) desirable place to live and work*.
- b. The vision that “our villages will be strong enough to sustain day to day services” should be amended to recognise that many villages are too small to support, or need, or want, day to day services. Leaving it as it is will lead to excessive pressure on tiny rural villages to grow very much larger.
- c. The third from last vision (housing dispersed to reflect our population) appears to pre-empt the entire consultation by supporting just one of the options.

2. Level of Growth (Page 13)

On question 1 on Page 13, what level of growth should we plan for, we recommend choosing to stay with the level of growth in the current Local Plan of 547 houses per year until 2026. This has been approved by an Inspector only two years ago. Current Neighbourhood Plans since adopted depend upon it. It would address any actual housing need but strike out the part of the SHMA which proposes building houses for incoming workers to take up notional jobs for which there is no evidence or justification.

3. Why Housing Need cannot be accommodated (Page 14)

We would say that accommodating this level of “housing need” is incompatible with protecting the countryside and the amenity of our towns and villages, and the Vision of South Oxfordshire *continuing to be a desirable place to live and work*. The actual economy of South Oxfordshire and Oxfordshire depends crucially on this, and it would be fatally compromised by building on this scale, as would the character and amenity of the area so valued by residents.

Further, the extra housing imposed by the SHMA is not a “housing need” in the sense of existing people or their families needing housing, which is already accommodated in the current Plan. It is an unfounded dash for growth and inward migration, which is not appropriate or sustainable in a largely rural County like ours.

4. Does the Settlement Hierarchy need to be changed (Page 17)

The Settlement hierarchy based on facilities introduced in the present Local Plan was a more scientific approach than previous subjective judgements. It was however flawed in supposing that just one facility made a village sustainable, especially when that one facility could be a busstop half a mile from the edge of the village down a narrow unlit lane, or gift shops in a local Garden Centre. We would say that a village would need several facilities, covering different categories – shops, public meeting places, public transport – and relevant to its needs, to be considered as sustainable for development. At least three relevant facilities should be available. What is more each facility should not carry the same score as presently. This would ensure that tiny settlements within only one or two remote facilities, or facilities irrelevant to sustainability, would be “unlisted” and not subject to new housing other than by exception.

Further, although the size of plots for development within “other” villages is limited, the number of plots allowed is presently open-ended. This could easily mean that a small spread-out village could easily double or more in size, when the target for development overall in the District is much lower. Proportionality should be instated to ensure that small settlements with minimum services do not grow at a rate they cannot accommodate, either sustainably, or in character terms. It is proposed that the cap should be 25% of the District’s overall growth target.

5. Where should the new housing go?

Of course we do not accept that it is needed, and therefore it should not “go” anywhere. Of the Options proposed:

A. Continue to Use Core Strategy Distribution

As the consultation document says this distribution is tried and tested by an Inspector already. It would however mean huge increases in allocated housing levels of almost 40%, overriding just completed Neighbourhood and Parish Plans. Even that is before the need to accommodate the Oxford overspill is taken into account, which would lead to a 130% increase in present allocations.

B. Major on Science Vale (Didcot)

The greatest part of the new housing forecast is to do with the impact of notional job growth centred on Science Park development. It is therefore reasonable to accommodate most of it there, where the jobs are claimed to be created, and filled by inward migrants needing housing. On the other hand, concentrating such very high levels of development in one place, especially since the existing Didcot plan is already well behind schedule due to developer’s reluctance, would grotesquely further expand Didcot. If adopted, only towns and villages within easy travel to work times of Didcot should be included”.

C. All in Science Vale

Desirable in principle, but may be impractical given developers' reluctance to build to present trajectories, with a consequent risk to five year supply. However, in the context of a new town to the West of the Science Vale outside South Oxfordshire, it could be attractive in both countryside and building efficiency terms.

D. All growth in single new settlement

A new settlement in the M40 corridor, Stone Bassett, was proposed and rejected in the 1990s and at the more recent South East Plan. Not only would it "take out" valued countryside, but would be more likely than other options to be a commuter town (because of motorway access) than meet "local housing needs". Additionally creating a new town with its infrastructure, could take longer than the plan period, especially if developers were reluctant to proceed, and thus lead to a five year housing supply problem and developer led predatory development. It would also raise food security issues in taking large swathes of greenfield land out of production. Apart from the M40, communications links inward to the County are poor and there is no readily accessible train station.

E. Dispersal

This proposal is that every settlement, except the very tiniest, whether or not now considered suitable for housing, should have a housing allocation, that is on average increase by 23% from current levels. This allocates as much growth to small villages without facilities as to major towns. It overrides sustainability considerations, Green Belt, AONB, and is the opposite of planning. The Options paper itself fairly itemises many of the reasons against. Where settlements themselves see a need for growth, especially to accommodate young people in rented accommodation, this may be acceptable on a case by case basis.

We strongly resist "a more permissive approach to infill" which could see very small villages having to accommodate a much greater percentage development than larger fully serviced ones. On the contrary we recommend that growth of small and "other" villages should be capped at 10% of the average rate for the District as a whole, e.g. if the average increase across the District is 25%, small and other villages should be capped at 2.5%.

F Next to Reading/Oxford

We agree with the District Council's assessment that this is an unacceptable option. Releasing Green Belt land beside Oxford would be a never-ending process once begun, and is in any case unacceptable. At Reading it would also risk a new bridge and consequent A329(M) to the M40, damaging a wide swathe of the District.

G. Raising densities

It is not clear whether this would make a useful contribution to the overall problem, or be a self-standing "option" on its own. It is however to be welcomed. Not only would it protect valuable green spaces but provide housing which was more affordable.

We commend it. More over if Oxford could be persuaded to adopt higher densities, it could satisfy a much greater proportion of its forecast “needs” itself.

H. Funding through development

Individual communities may have such acceptable proposals and each should be considered on its merits. We are not advocating any. It is not clear what overall contribution they would make to housing numbers.

Overall, the proposals all suffer from the fact that the sheer numbers it is proposed to allocate are unacceptable, except for option G., raising densities, which would be beneficial even on the existing housing trajectory which we consider should be retained.

Looking at the tick box panels on Page 28, we “like” Option A, but would comment that this is in the context that we also think the original Core Strategy housing numbers should be worked to. We “like” Option C as it exactly reflects the extra housing need hypothesised to arise from inward migration to hypothetical new jobs in the Science Vale, which is the only basis for increasing housing provision above the existing Local Plan levels anyway. We also “like” option B, providing that the other “sustainable settlements” are around the Science Vale. We “don’t like” D, E or F for the reasons given above. We “like” G and have no views about H.

6. The Other Questions

a. Neighbourhood Plans page 29

We have become aware of a number of occasions when Neighbourhood or Parish Plans have been properly prepared and approved, only to be undercut and made worthless by subsequent changes in Council or Government Policy, which happens increasingly frequently, as this new Local Plan consultation, only two years into the current plan, shows. We think this is unfair and unreasonable, and destroys the motivation of all who have worked so hard to produce them. Such plans should have a guaranteed valid life span, we believe of at least ten years.

a. Meeting Oxford’s Housing needs page 30.

It is important to remember that these are overwhelmingly not current actual needs but hypothetical future “wants”. We believe Oxford could do far more than it does to resolve its own problems rather than dumping them on us. It could cease to use land that becomes available for yet more commercial development, ratcheting up housing growth, and instead use it to build houses. It could build at up to twice the density it actually does. The part of Oxford’s future housing need which stems from notional new job creation, should be satisfied by moving the job generators elsewhere in Oxfordshire where high level employment would be beneficial.

After that, any remaining “need” should be met in easy travel-to-work locations outside the Green Belt, the retention of which is vital to all of us.

Oxford could meet far more of its housing needs itself by replacing commercial development with residential and increasing densities. Beyond that, new commercial development and the needs it creates should be steered away from Oxford.

b. THE GREEN BELT page 31

The Green Belt as a whole is essential to South Oxfordshire. Its primary purpose is to prevent urban sprawl. Anyone who has seen Los Angeles – which is said to be 120 miles wide and growing – knows what urban sprawl looks like. Without the Green Belt Oxford would engulf its surrounding villages and Hoover up even more of the employment in the County. Once the Green Belt starts to be dismantled the process will not stop.

This is particularly the case at the edge of the City at Grenoble Road. An urban extension there, which the City is pushing for, would be in no-one’s interest but that of the landowners involved, who would see astronomical appreciation in land values. The landowners, oddly enough, are the City itself and its LEP quango allies, the University Colleges.

Whilst there are no specific areas we believe need to be added, it should be noted that OXFORD’s Green Belt is very narrow compared with others, and it could beneficially be expanded as a whole.

c. How many new jobs should we plan for (page 32)

It is not clear why in a County of effectively full employment, jobs need to be “planned for” on the scale to which South Oxfordshire has signed up. (The draft Oxfordshire Strategic Economic Plan is proposing to create 80,000 jobs by 2030, which will lead to significant inward migration into the county.) Certainly local authorities cannot create jobs, except in their direct employment. We believe that the level of employment and associated development proposed for Science Vale risks overwhelming local communities. We need to continue to support existing employment areas and towns across the District to ensure that these remain sustainable.

d. Improving Shopping and Town Centres (Page 33)

We believe the needs of each centre will be individual, and again business development will ultimately be decided by businesses themselves. We would however like to see trade concentrated in High Streets rather than out of town or in Oxford; greater use of local produce; and town centres better served by local transport and free or affordable parking to make them accessible to all surrounding communities.

e. TRANSPORT AND MOVEMENT

Major transport infrastructure requirements will be dependent on the strategy to be adopted following this consultation.

At this stage we recommend concentration on clearing and opening current rights of way, including pedestrian “pavements” and cycle lanes, with which we are lucky to be relatively well supplied.

Improvements to the transport network will be necessary but will be dictated by the development plans adopted. It is however clearly important to improve transport links westward to allow West Oxfordshire to relieve development strains in the East of the County.

f. PLANNING POLICIES

GENERAL.

In this commentary we recommend that policies should be retained unamended except where commented on. The comments may have knock-on implications for other wording in policy commentaries.

A. CORE STRATEGY

1. CSEM5. Add. Taking into account the location of the site within the Green Belt and the views of the local community.
2. Policy CSH2. Alter. ‘On sites where housing development is acceptable in principle, the highest possible density will be required consistent with the character of the area, to maximise space utilisation and affordability. A minimum density of 25 dwellings per hectare (net) will be required unless this would have an adverse effect on the character of the area’.
3. Policy CSH3. The affordability percentage should be relaxed/eliminated where high density/low price developments are proposed, and in settlements where there is a strictly local – that is related to that settlement - need for affordable housing. This will prevent affordable being a barrier to development, or place unnecessary strain on prices which would be low anyway. In all cases, on a case by case basis, a contribution in lieu should be acceptable.
4. CSH5, Gypsies and Show People. Add. In all cases allocation of sites will be constrained by designations, e.g. Green Belt, and local opinion will be given great weight.
5. CSR1, Housing in Villages.
 - a. Policy should be amended to cap total development within villages without allocations to a growth of a maximum of 2.5%. At present size of sites is capped, but not number.
 - b. The criteria by which villages are assessed and classified should be reviewed. At present, just one facility, in one case a bus stop 800 metres from the edge of the village accessible only down a narrow and unlit lane, in another a gift shop in a garden centre, classified it as “other” and “sustainable” for housing. A busstop alone – even if it had been accessible - does not amount to sustainability. Sustainability would require at least three facilities, useful to the community, and of a mix of types, transport, retail, service.
6. CSR3 Community Facilities and Transport. Amend. Proposals which result in the provision of facilities and services in the rural areas will be encouraged *where these are welcomed by the community and of direct relevance to its sustainability.*

7. CSEN2 Green Belt. Add for clarification. Line 6 within box. Planning permission will not be granted for development within the Oxford Green Belt that *reduces openness or is otherwise* contrary to national policy guidelines.
- B. SAVED LOCAL PLAN POLICIES
 1. C1,retained part. Restore AGLV status. Although frowned upon at the time of the CS it is understood that this is now widely used by other authorities and is much clearer to understand than the landscape character studies.
 2. CON 5,Conservation Areas. 3.93. Add. *“any change within a designated Conservation Area is by definition harmful unless it can be demonstrated that the conservation area would be preserved or enhanced by it”.*
 3. CON6 3.96. Change to. *“The loss or alteration of any building as it existed at the time of the Conservation Area designation will not be permitted unless it can be shown that it would have an insignificant or beneficial effect on the Conservation Area as a whole. Removal will usually be refused especially where it is not advocated in the Conservation Area appraisal”*
 4. CON15 After English Heritage Register in the highlighted box add “or where there is other robust evidence”.
 5. EP3. Add in highlighted box. After “permitted” add *unless exceptional circumstances to justify them can be shown*. After “implemented” add *and maintained*.
 6. D3. Preface highlighted box wording with “where appropriate”.
 7. H10 Delete “particular” insert “strictly” before local need in (i) in highlighted box.
 8. R5. Include A. *the long term need for and viability of a proposed golf course must be demonstrated, noting that the use of golf courses is in decline generally and the District is already overstocked*. B. *Floodlit driving ranges will not be permitted. Allowing land to be adapted for golf involves considerable degradation through utilitarian landscaping and alien constructions, tees, greens and bunkers, often marring views over considerable distances, especially when floodlighting is involved, which can also damage local amenity*.
 9. A4. Highlighted Box, (ii) after “greater proportion of goods sold” add *by value*. This will ensure that any other sales are purely incidental to the farm’s produce.
 10. AD1. Add at end of highlighted paragraph, after “is not spoilt”. Advertising beside roads or on roundabouts will not be permitted to avoid distraction of drivers in the interests of public safety.

Yours sincerely



Michael Tyce
Chairman, Campaign to Protect Rural England, Thame.