

# West Oxfordshire Local Plan Housing Consultation 2014

## Response from CPRE West Oxfordshire - Sept 14

1. *Do you agree that the period 2011 - 2029 is a reasonable period of time for the new West Oxfordshire Local Plan to cover? If not, what period should the plan cover and why?*

Yes

2. *Do you support the proposed Local Plan housing target of at least 9,450 homes to be provided in West Oxfordshire over the period 2011 - 2029 (525 per annum)?*

*If you do not agree with the proposed target, please explain why and identify which alternative target you consider should be used.*

No. CPRE Oxfordshire welcomes the decision by West Oxfordshire District Council to set a housing target that is lower than the recommendations of the SHMA. However, this number is still nearly 3,000 more than the “economic growth” option in the original draft Local Plan, which WODC recognised would put infrastructure under pressure, with potential negative sustainability impact. A 73% increase in the planned number of new houses to 525 houses a year is a significant inflation of the figure previously set out in draft proposals of 306. The new figure relies on high in-migration and is above national rates. This could result in unnecessary loss of the countryside and erosion of the rural character of the District. CPRE believes the SHMA is unsound and unsustainable and should not be used as a benchmark in setting the District's housing policy. CPRE therefore urges the District Council to further reduce the housing target, especially in view of the District's past over-delivery of housing. Between 2001 & 2011  $\frac{3}{4}$  of the district's population growth was accounted for by net in-migration. Therefore the resulting overblown housing projections in the SHMA do not reflect organic growth.

It is clear that the present SHMA grossly exaggerates the likely real housing need in Oxfordshire; if adopted for planning this will lead to the release of far more land than needed, and inevitably include green field, Green Belt and AONB as well as the desirable brown field sites; builders will only satisfy actual demand so they will ignore brown field and choose “green field first”; thus actual housing needs which could have been satisfied mainly, or even entirely, on brown field land, will instead eat up green fields and the edges of settlements. The repercussions of this policy will be as far-reaching & damaging to the rural way of life as the Beeching cuts to the railways 50 years ago. CPRE's independently commissioned analysis of the SHMA & its inherent flaws is here:



Oxfordshire SHMA  
FINAL REPORT.pdf



SHMA Critique -  
Executive Summary F

CPRE is particularly concerned that current inadequate infrastructure, such as the shortcomings of the congested A40, the travel artery of the district, is being treated as an afterthought. This issue should be tackled before more housing is considered.

Furthermore, although WODC acknowledges the environmental constraints, such as a third of the district being AONB & >10% being in flood risk areas, that hamper the ability to deliver a very large number of houses in a sustainable manner, not enough has been done to reduce projections accordingly. The Sustainability Appraisal commissioned by WODC argued that higher levels of housing delivery would have negative impacts in terms of environmental & heritage considerations. West Oxfordshire is essentially a rural district, which residents want to protect as such. Too much credence is being given to economic forecasts which WODC concedes are volatile & unreliable.

Windfall rates have been 220 per annum on average over the last 12 years, so an allowance of 100 per annum seems low. If windfall rates are sustained, that would mean an over-delivery of 120 per annum and 1800 over the plan period. Since high windfall rates caused past over-delivery, it is not sensible to encourage continuation. A more sensible allowance could avoid the need to build on up to 150 acres of green-field space.

Brown-field sites should be actively sought out and allocated in preference to green-field land. This is in line with policy, but in reality, it does not happen. Perhaps there could be an incentive for building on brown-field sites.

*3. Do you agree with proposed spatial strategy outlined in paragraphs 5.15 - 5.19?*

*If not, which alternative strategy do you think should form the basis of the new Local Plan?*

Yes. The emphasis on the 3 main towns & to a lesser extent the service centres is sensible. The absolute numbers are the contentious parts.

*4. Do you support the overall level of housing provision identified for the Witney Sub-Area (3,550 new homes)? Please expand as necessary.*

No. The number of houses planned still gives too much weight to the SHMA projections, which CPRE believes are fundamentally flawed. The proposal to make

the A40 new junction at Downs Road a roundabout rather than a proper junction served by slip roads is short-sighted & will provide another impediment to the free flow of traffic on this most important road in the district.

5. *Do you support the draft allocation of land at East Witney for the provision of 400 homes? Please expand as necessary.*

Yes, if mitigation measures mentioned are implemented. The improvement to the A40 junction at Shores Green is a welcome addition.

6. *Do you support the draft allocation of land at North Witney for the phased provision of 1,000 homes with the majority (c.800) to come forward after 2021? Please expand as necessary.*

No. As it states in WODC's assessment of strategic site options, "the delivery of this site requires the provision of extensive built infrastructure in an environmentally sensitive flood-risk area. The site is therefore sequentially less preferable to other site options that are not affected by flooding. The northern part of the site is of high landscape sensitivity & would encroach into the landscape setting & visual separation between Witney & the villages of Hailey/Poffley End." Furthermore the site is adrift from Witney's main employment areas. The feasibility of the site is as difficult now as it was in 2012, when it was rejected. The West End Link lies in the Upper Windrush Target Conservation Area - & is defined as a high/medium risk flood area. In addition the Hailey Road drain, which has a history of significant flooding, would be adversely affected by the North Witney development. OCC studies concluded that the WEL2 would create historic high traffic levels in West End, increase congestion in the sensitive Bridge St junction area of Witney as well as causing rat-running & potential capacity issues on New Yatt Road and Hailey Road, which would need to be addressed if North Witney & WEL2 development were to go ahead. The very fact that with reference to so many aspects the onus will be on the developer to demonstrate that they can cope with the various constraints & demands of the site illustrates the complexity & impediments to delivering a satisfactory development.

7. *Do you agree with the exclusion of the alternative site options to the south and north east of Witney? Please expand as necessary.*

Yes.

8. *Are there any other sites not identified that you think should be identified within the Witney sub-area to help meet the overall housing requirement?*

Unknown.

9. *Do you support the overall level of housing provision identified for the Carterton Sub-Area (2,450 new homes)? Please expand as necessary.*

No. The number of houses planned still gives too much weight to the SHMA projections, which CPRE believes are fundamentally flawed.

10. *Do you support the proposed draft allocation of land at East Carterton for the provision of 700 homes? Please expand as necessary.*

If the overall numbers were reduced to a more prudent level, this development could be avoided. It is the least worst strategic option however. If it proceeds, the buffer to Brize Norton should be protected and the link road that avoids traffic through the village funded. Future growth to the East of the site beyond Burford Road, should not be allowed, to avoid closing the gap between Carterton and Witney.

11. *Do you support the proposed draft allocation of land at REEMA Central for the provision of 200 homes (net)? Please expand as necessary.*

The REEMA allocation is too low and the town centre should not be so under-developed when housing is planned on green-field land. Any development planned now should not prevent maximisation of this opportunity in future and the potential of the site for future plan periods should be considered.

12. *Do you agree with the exclusion of the alternative site options to the north of Carterton at Kilkenny Farm and to the west of Carterton? Please expand as necessary.*

CPRE agrees with the exclusion of Carterton West. The Shill Brook should not be breached and development should not occur on such an open, unbounded landscape. Carterton North is unnecessary. Carterton's housing allocation is already high. Future growth should in the first instance and as a matter of priority, be centred on REEMA. Existing North allocations (David Wilson recent applications) and Shilton Park should be linked to REEMA North by road to integrate the new sites with the town and open up access to the Country Park.

*13. Are there any other sites not identified that you think should be identified within the Carterton sub-area to help meet the overall housing requirement?*

All REEMA sites should be utilised. If the Co-op fails, perhaps a Marriot's Walk style development with flats would work in the town centre. Similarly a redevelopment of the Giles shops (which are not well designed buildings), could incorporate some flats, if the owner were amenable. The Milestone Road site should be maximised for housing for the elderly, as there is still free space. The employment land opposite the RAF Base has been vacant for many years and could be used for housing. Whilst there are expectations of future employment growth, we should not sacrifice green-field land for housing on the basis of a hope of businesses coming to the town at some stage in the future.

*14. Do you support the overall level of housing provision identified for the Chipping Norton Sub-Area (1,450 new homes)? Please expand as necessary.*

No. The number of houses planned still gives too much weight to the SHMA projections, which CPRE believes are fundamentally flawed.

*15. Do you support the proposed draft allocation of land at East Chipping Norton for the provision of around 500 homes? Please expand as necessary.*

CPRE recognises the difficulty of allocating building land in Chipping Norton, where the Cotswolds AONB impinges on 3 sides of the town. So, the site to the east would appear to offer the best option, particularly if the extra infrastructure required can be delivered & the impact on the landscape can be managed effectively. The scale of the proposed development still gives cause for concern.

*16. Are there any other sites not identified that you think should be identified within the Chipping Norton sub-area to help meet the overall housing requirement?*

Unknown.

*17. Do you support the overall level of housing provision identified for the Eynsham - Woodstock Sub-Area (1,350 new homes)? Please expand as necessary.*

No. The number of houses planned still gives too much weight to the SHMA projections, which CPRE believes are fundamentally flawed. The proposed housing in Long Hanborough is totally out of proportion & would put the local road

network, the primary school & the GP service under intolerable strain as well as extending the village envelope onto green fields in an unacceptable fashion.

*18. Are there any other sites not identified that you think should be identified within the Eynsham - Woodstock sub-area to help meet the overall housing requirement?*

Unknown.

*19. Do you support the overall level of housing provision identified for the Burford - Charlbury sub-area (650 new homes)? Please expand as necessary.*

No. The number of houses planned still gives too much weight to the SHMA projections, which CPRE believes are fundamentally flawed.

*20. Are there any other sites not identified that you think should be identified within the Burford - Charlbury sub-area to help meet the overall housing requirement?*

Unknown.

*21. Do you agree with the overall level of business land provision identified in the emerging Local Plan (60 hectares)?*

No. 60ha seems excessive, given the inexact science of estimating future jobs & the amount of B-class land that is currently underused & underoccupied. As land is a valuable asset, an over allocation would be damaging. Any sustainability assessment for the District must consider the availability of land for future generations and not waste land now.

*22. Do you agree that there is a need to provide additional business land in Carterton to attract inward investment?*

Statistics show that there is a high level of commuting in Carterton to other areas of Oxfordshire, demonstrating an apparent need for more business land in the town. However, the need for further employment land in Carterton is debatable, in view of the amount of land in the town that has remained vacant for years.

*23. Do you support the potential option of using the District Council's playing pitches at Monahan Way for business use, subject to their replacement in a suitable location elsewhere? If so, where should the replacement pitches be provided?*

This may be an option, so long as the playing fields can be relocated elsewhere.

*24. Are there any other sites in or around Carterton that would be suitable for business use?*

Unknown

*25. Do you agree that all schemes resulting in a net gain of one or more dwellings (except self-build) should be required to make provision for affordable housing either on-site or through a commuted sum payment?*

Yes.

*26. Do you agree that self-build housing schemes should be exempt from having to make provision for affordable housing (subject to self-certification)?*

Yes.

*27. Do you consider that the threshold for on-site provision of affordable housing should be set at 6 dwellings, 11 dwellings or at a different level altogether?*

6. The evidence showing that small schemes have become more prevalent in recent years lends weight to the need for including these in the need for on-site provision of affordable homes. Also, the poor provision of affordable homes in rural areas historically endorses this approach.

*28. Do you agree with the proposals to seek up to 50% in the higher value area, up to 40% in the medium value area and up to 35% in the lower value area (as defined on Figure 8.2)?*

By positioning these proportions as “up to” surely lays the system open to abuse. Up to 50% can mean only 1%, which makes a mockery of the rule. It should be “at least”, but if the levels are then deemed to make developments unviable, there may be scope to adjust them downwards slightly.

29. Do you agree that in terms of tenure, the Council should generally seek two thirds affordable rented housing and one third intermediate?

It is difficult to comment on this. It would be helpful if the council could explain in detail how social rented, affordable rented & intermediate housing works. How affordable is “affordable”?

30. Do you agree that the affordable housing commuted sum should be calculated on a £per m<sup>2</sup> basis to be worked up alongside the Council’s CIL draft charging schedule?

Yes.

31. The most recent evidence set out in the Oxfordshire SHMA (2014) suggests that as a general guide, the Council should seek the following proportions of market housing:

- 4.8% 1-bed
- 27.9% 2-bed
- 43.4% 3-bed
- 23.9% 4-bed

*Do you agree that this is an appropriate approach in West Oxfordshire?*

There would appear to be scope for altering the balance to say, 40:60 ratio of 1-2 bed vs 3-4 bed houses as part of the drive to providing more affordable homes. Predictions have shown that we need a higher proportion of smaller units than indicated by the planned mix. There should be more 1-2 bed units and this should be reflected in the land take of site and development densities to avoid wasting land. For this mix of housing the average density will be at least 20, as opposed to 16, which is a 20% reduction in land take. It is important that housing constructed is in line with this policy and not inclusive of a greater proportion of larger houses, else we will encourage higher population growth than planned, with all the problems that will bring. The lowered overall average occupancy rate assumed in population and housing estimates, relies on the average occupancy of new households being low (around 1.8 people per home). This will only happen if small homes are built.

32. The most recent evidence suggests that as a general guide, the Council should seek the following proportions of affordable housing:



- 65% - 67%                      1-bed and 2-bed
- 33% - 35%                      3-bed and 4-bed

*Do you agree that this is an appropriate approach in West Oxfordshire?*

Smaller units are what we need for sure, but 65% may not be sufficient. CPRE believes the need is for an even greater proportion of 1-2 bed units or housing for the elderly, outnumbering 3-bed+ houses by a factor of 4 to 1. Again, small units take up less land.

33.

*Do you agree with the measures outlined above and consider they will help to meet the future housing needs of West Oxfordshire's ageing population?*

*Are there any other specific measures that should be introduced to help meet the future housing needs of older people in West Oxfordshire?*

The demographic shift represented by the ageing population is one of the greatest challenges our society faces. Unlike other projections like migration & jobs, it is relatively easy to calculate numbers of older people likely to be resident in the district in future. The council's statement of intent at least addresses the challenge.

34.

*In addition to securing a good and balanced mix of house types and tenures, providing more affordable housing and encouraging self-build, are there any other specific measures that the Council should be pursuing through the Local Plan to help meet the future housing needs of younger people in West Oxfordshire?*

No.

35.

*Do you agree with the measures outlined above and consider they will help to meet the future housing needs of people with disabilities in West Oxfordshire?*

Yes.

*36. Other than in relation to the overall objective of securing a good, balanced mix of house types and tenures, are there any specific measures the Council should be seeking to introduce through the Local Plan to address the needs of black and minority ethnic households in West Oxfordshire?*

No.

*37. Other than in relation to the overall objective of securing a good, balanced mix of house types and tenures including market and affordable housing, are there any specific measures the Council should be seeking to introduce through the Local Plan to address the needs of households with children?*

No.

*38. Do you agree with the measures proposed and consider they will help to meet the future housing needs of those wishing to undertake self-build projects in West Oxfordshire?*

Yes.

*39. Other than the application of a criteria-based policy to deal with speculative planning applications and specific site allocations for travelling communities to be identified in the Local Plan (Part 2) document are there any other specific measures that the Council should be seeking to introduce to meet the future housing needs of travelling communities?*

No.

**For further information:**

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