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By email:
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**THE CHERWELL LOCAL PLAN 2011 - 2031 (PART 1) PARTIAL REVIEW - OXFORD'S
UNMET HOUSING NEED ISSUES AND SCOPING CONSULTATION JANUARY 2016**

**RESPONSE ON BEHALF OF CPRE CHERWELL (NORTH) & CPRE CHERWELL (SOUTH)
DISTRICTS**

Please find attached our response to this consultation.

Despite the short turnaround time, the amount of reading material and the complexity of the issues, we have done our best to provide clear and precise answers to the questions asked.

However, we would therefore welcome the opportunity to come and discuss these matters in more detail with the Planning Policy team.

Yours sincerely,

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On behalf of:
CPRE Cherwell (North) District
&
CPRE Cherwell (South) District

THE CHERWELL LOCAL PLAN 2011 - 2031 (PART 1)
PARTIAL REVIEW - OXFORD'S UNMET HOUSING NEED
ISSUES AND SCOPING CONSULTATION JANUARY 2016

RESPONSE ON BEHALF OF CPRE CHERWELL (NORTH) & CPRE CHERWELL (SOUTH) DISTRICTS

Question 1. Is 3,500 homes a reasonable working assumption for Cherwell in seeking to meet Oxford's unmet housing need?

It is essential to consider that the Oxford unmet housing need this revision seeks to accommodate is not current need, or the prospective future need of current residents - which is largely being satisfied within the City - but need which MAY be created by as yet unspecified new companies and jobs, should the LEP forecasts of future growth come to pass.

These are in turn hypothesised to arise largely from the commercial realisation of new ideas created at the Universities, so-called spin-offs. The Universities are however not businesses, and there is therefore no reason (as SQW acknowledges) why they must be accommodated in or even near Oxford - or for that matter, in Oxfordshire.

In those circumstances, the crude divvying up of this possible future demand amongst the District Councils is supported by no robust evidence of any kind - as to for example where this need will arise and/or where it may be most satisfactorily accommodated.

CPRE of course considers that the SHMA is overblown, and - despite the length of the GL Hearn report - light on evidence. For that reason it is CPRE's position that the housing trajectory in the adopted plan already exceeds any likely level of gross demand.

However, even taking the SHMA as a given, half of the total housing demand it portrays is a hypothetical assumption about the number of new workers coming to Oxfordshire to take as yet unknown new job opportunities.

It is an arbitrary proportion of that unknown level of hypothetical future demand that Cherwell is now seeking to accommodate without any evidence of the extent if any to which Cherwell may be a desirable place to accommodate it.

It is not a reasonable working assumption to do so. Given that this is hypothetical future demand, which may or may not arise, at unspecified places and times, the partial revision of the plan is at best premature.

Question 2. Should additional housing in Cherwell to meet Oxford's needs be supported by additional employment generating development?

Certainly Not. The extra housing is proposed to satisfy the unmet housing need which might (see Q1) arise from Oxford job creation. Cherwell creating yet more additional employment to “support” those houses would only, if the Oxford unmet housing need is real, compound the problems. If there is a reasonable fear that the houses might be built but the Oxford “unmet need” might not then arise - in our view a very likely scenario - then that is clear evidence to postpone development until the notional Oxford need crystallises.

Cherwell’s own jobs need has been accommodated in the current Local Plan.

Question 3. What are Oxford's key issues that we need to consider in making a significant contribution to meeting the City's unmet housing need?

It is up to Oxford to define and quantify evidentially the nature of its needs and issues, which it should do in connection with its long delayed agreement to update its own Local Plan, not for surrounding Districts to identify them.

In CPRE’s view a large part of the problem we may now face is to do with Oxford’s persistent use of development sites such as the Northern Gateway to ratchet up housing need through more job creation rather than satisfy it through housebuilding, and, where sites are allocated for housing, the inappropriately low densities at which they are built out, given that the greatest part of demand is said to be for low-cost development.

Reversing these two flawed policies would allow Oxford to satisfy within its borders, and more sustainably, more of the “unmet need” hypothesised.

Question 4. What are the key principles or goals that the additional growth in the District should be aiming to achieve?

The additional growth arises from no Vision by Cherwell, but from imposition by the Growth Board in divvying up Oxford’s hypothetical future needs.

It would be indefensible to attempt to post rationalise it through some Vision for Cherwell.

Question 5. What should the focused Vision for meeting Oxford's unmet need contain?

A Vision for meeting Oxford’s imposed hypothetical future need, which is based on hypothetical realisation of spin-off ideas that have not yet occurred, would be to firstly ensure that meeting it is contemplated only when it crystallises and secondly that it is then met in the most sustainable location, which will not necessarily be Cherwell, or indeed Oxfordshire.

There is no reason to assume that the University's spin-offs will be best realised in or near Oxford. Consideration should be given to those areas of the country which have vacant employment land and less expensive housing and which would be very keen to benefit from some of the growth opportunities being generated here. If Oxfordshire were to pursue the idea of economic twinning with some of these areas, this could lead to a win-win solution.

This would indicate a re-establishment of the County Towns Policy, or even realisation in the Northern Powerhouse, neither of which would affect the success or failure of the as yet unidentified schemes.

As far as Cherwell itself is concerned we see no reason to change the current Vision and the Spatial Plan which underpins it, summarised on Page 10 of the adopted Local Plan:

- *Focusing the bulk of the proposed growth in and around Bicester and Banbury*
- *Limiting growth in our rural areas and directing it towards larger and more sustainable villages*
- *Aiming to strictly control development in open countryside.*

It is against that template that any accommodation of Oxford's hypothetical future unmet need should be determined.

This would include for example protection for the whole of the Green Belt as identified in the NPPF.

Question 6. Do you agree that the plan area or 'area of search' for the Partial Review document should be well related to Oxford City?

No. As we have shown in our answer to Question 1, the hypothetical future unmet need in question is not related to the City in the sense that it can only be met there. To the extent that there might be a direct City connection it will only be that the new jobs that might be created might arise from University "spin-offs". These could however be accommodated anywhere and there is no reason at all to suppose that this must be adjacent to or even near the City.

To the extent that Cherwell may wish to accommodate them, the existing Spatial Strategy would be the most appropriate model.

Question 7. What factors should influence the plan area or 'area of search' for the Partial Review document?

Because the new jobs guestimate on which the housing need is hypothecated have not yet been identified, much less realised, it is premature to identify an Area of Search, and since it cannot be known where they would arise if they did eventuate it would be impossible to do so. Neither of course can it be known whether houses would be occupied by the classes of people for whom they were provided.

In the lack of any evidence to the contrary, the only basis on which hypothetical distribution could be made, should that be felt to be desirable, would be on the current Spatial Strategy. Even then this could only be provisional until there was some robust evidence of the extent, certainty and location of the future “unmet housing need”.

With those very substantial caveats, brownfield sites should be allocated and developed first, and the highest practical density assumptions should be made, given that if anything is certain in the present housing demand figures, it is that low cost housing is needed to balance Oxfordshire’s housing stock.

Question 8. Would a district-wide area be appropriate?

Yes. The current Spatial Strategy is “District Wide” but correctly identifies areas where growth will and will not be directed. It should be the template. Equally, protected areas, such as Green Belt, should be off-limits.

Question 9. Should an area based on the Oxford Green Belt be considered?

No. The essence of the Green Belt is its permanence, and the role it plays in preserving the essentially rural character of the County by preventing Oxford sprawl is invaluable. There is no “sustainability” argument for accommodating Oxford’s unmet need within it, for two fundamental reasons:

- i. The core of sustainability is not taking away from future generations benefits they would otherwise have enjoyed. Eroding the Green Belt would be by definition unsustainable and could be considered only if there were exceptional reasons to do so.

The NPPF does not consider that housing need - even if real - is an exceptional circumstance to override the presumption of protecting the Green Belt.

- ii. There is no sustainability argument for meeting “Oxford’s unmet need” in the Green Belt adjacent to Oxford, as the “need” is not Oxford-related despite the name, but arises from hypothetical future jobs which could be realised anywhere. Even if it were Oxford-related, it could be met outside the Green Belt and should therefore not be met within it. Even if it could not, it should be reduced to the extent it would otherwise have been necessary to use Green Belt land.

It is worth mentioning at this point that the NPPF does not in fact place any obligation on Councils to review Green Belts at the time of a Local Plan. It states only that IF they are reviewed the Local Plan is the time to do it.

Only IF there are exceptional reasons for considering development on a particular piece of Green Belt land should its contribution to Green Belt purposes be assessed in order to determine the balance for release/retention.

The Green Belt study by the County is an interesting - though contentious - assessment of Green Belt parcels County wide. It finds no sites that fail to meet at least two of the five Green Belt purposes and “one is enough” to justify retention. The studies by other Districts have been “searches for sites” with no exceptional circumstance relating to them individually, and are thus inadmissible in principle. In any case even they find that all sites contribute to at least two purposes.

Question 10. Should a specific housing supply be identified for meeting Oxford's needs with its own five year supply of deliverable sites?

Yes and No. Ring-fencing the hypothetical Oxford unmet need would be desirable to protect the District’s general Five Year Supply from its non-realisation. On the other hand if the houses are accommodated within the existing Spatial Strategy as we recommend, it will be hard to show that that element of the forecast has been undershot or exceeded, as it cannot be known which houses have been occupied by whom.

In practise this could only perhaps be done by creating a special new settlement or area for ‘unmet need’, which would be to ‘ghettoise’ it. Even then the occupation of the houses could not be controlled. Indeed, even though the houses might be built in Cherwell, the new job holders might choose to live elsewhere.

It is desirable but it is hard to see how it might be achieved in practise.

Question 11. How could Cherwell ensure that a five year supply for Oxford is managed without the existing Cherwell strategy and its housing requirements being adversely affected?

The best strategy would be to delay allocating “unmet need” until its extent, nature and timing, and applicability to Cherwell can be more firmly established.

It is understood that the new SEP may “phase” jobs growth which Districts could then phase housing development to match.

The upcoming Oxford Plan refresh may alter the numbers and, particularly the extent to which they can and should be accommodated within the City through higher densities and dedication of land to housing rather than jobs growth.

Cherwell could seek to influence the Growth Board on which it sits to determine more objectively the locations within which job growth might occur, and then determine any housing that might therefore be needed.

Indeed the Councils could decide through the Growth Board to reduce the Growth trajectory to something more realistic and the housing demand to levels within the likely capacities of builders.

It is strongly recommended that at the very least “unmet housing need” should be phased to the back ten years of the plan, reflecting more realistically its likely trajectory, and that the other measures to reduce or at least define the growth path should be examined.

Question 12. Do you have any comments on the housing issues identified?

We generally support the approach in paragraph 5.37 on the assumption that it reflects the strategies in the current plan.

Avoidance of use of land presently designated as Green Belt should be made specific.

Question 13. Are there any additional issues that Cherwell District Council needs to consider?

Housing Densities should be substantially increased to minimise land take and as the only practicable route to providing less expensive/starter housing.

Current Policy B102 recognises the need to make efficient use of land but specifies only a minimum density of 30 per hectare which is at the bottom of the PPG3 range of 30-50 and well below, say, very desirable Victorian terraces at 70 per hectare. There is obvious scope for substantially increasing target densities.

Failing to do so - because developers generally prefer more profitable low densities, for instance - will mean that a large proportion of new houses will go to new commuters with no connection to the District, whilst the reasonable housing needs of residents will go as unsatisfied as they are today.

Question 14. What are the specific housing objectives for meeting Oxford's unmet needs within Cherwell that we need to consider?

As stated above it is premature to begin to recognise an unquantified need at some indeterminate time in the future, and it would be foolhardy to attempt to do so.

At such time as the need for extra housing can be robustly identified, and the need for it to be in Cherwell demonstrated, it should be:

- Allocated in accordance with current spatial strategies in the adopted Local Plan.
- Phased in accordance with a demonstrable trajectory of jobs growth.
- Recognised that it does not need to be situated near Oxford.

- Built out at the highest practical densities to minimise land-take and provide lower cost housing.
- Be concentrated on brownfield sites where practicable.
- Avoid Green Belt and other designated land.

Question 15. What locations should the Council be considering for the identification of strategic housing sites to meet Oxford's unmet needs?

New housing - when and if better justified - should follow the Spatial Strategy in the adopted Local Plan.

Question 16. Are there any transport issues you would like to raise?

LTP 4 would require review in the light of the increased housing numbers; following the existing Spatial Strategy should minimise the adjustments which might need to be made.

Question 22. Are there any sustainability issues you would like to raise?

- It is inherently unsustainable to build housing over and above the District's needs and the as yet to be evidenced "unmet housing need", as this will either lead to empty housing or to a take-up by new commuters, probably to London.
- It is noted that the NPPF declares sustainability the golden thread running through all its policies and declares that housing development is not a reason for releasing either Green Belt or AONB land. For that reason it is clearly unsustainable to do so. It is also unsustainable in the wider sense that it removes a benefit which future generations would otherwise have enjoyed.

Question 23. How do these issues affect the potential development locations to meet Oxford's unmet needs?

See answer to question 22. For those reasons, the "unmet Oxford need" should not be accommodated until there is more certainty that (a) it is real and (b) has to be met in Cherwell, and in any event development in designated areas such as Green Belt and AONB must be eschewed.

Question 24. Are there any natural environment issues you would like to raise?

The natural environment of Cherwell District is overwhelmingly rural, and little or no consideration is given to the impact on character of extra housebuilding and,

especially, whether there is, as we fear, a tipping point after which industrialisation becomes self-reinforcing. The Council must give consideration to those issues for the benefit of the residents it is its duty to serve as well as for the countryside CPRE is pledged to seek to protect.

Additionally, Cherwell is an area of water stress and flooding, both of which will be exacerbated by population increase and by the effect of development in increasing pressure on supply and run-off and in reducing the ground available to absorb precipitation.

ENDS