

18 April 2017

working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

West Oxfordshire Local Plan 2031 - Stage 2 Examination

CPRE West Oxfordshire - Written Statement - Matter 6 - The Settlement Hierarchy, the Spatial Strategy and preliminary questions on the Housing Site Selection Process & Five Year Supply

6.3 In broad terms are the general principles for all development, set out in policies OS1 and OS2, positively prepared, justified, effective and consistent with national policy?

We are concerned that the revised policy OS2 has dropped the requirement around prioritising brownfield land. Namely, that all development should be located where:

‘it makes use of previously developed land where available, provided it is not of high environmental value (eg ecology) and the loss of any existing use would not conflict with other policies of this plan’.

We note that the wording remains in Policy H2, but feel that it should remain as an overall principle. The policy would be in line with NPPF Para 17:

‘encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;’

Research by CPRE suggests that well over a million homes could be accommodated on suitable brownfield sites, saving precious countryside.

This month’s introduction of the Brownfield Land Regulations is most welcome. The Housing White Paper¹ also confirms the importance of previously developed land:

‘1.24 We must make as much use as possible of previously-developed (‘brownfield’) land for homes - so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside. The Government is already pursuing a number of reforms to make this happen, as set out in the annex.

1.25 Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high

¹ Fixing our Broken Housing Market, DCLG, Feb 17

flood risk). To make this clear, we will amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes, following the broad support for this proposal in our consultation in December 2015.'

In this context, we would strongly recommend the re-insertion of the above bullet point into the list of General Principles.

6.6 I have yet to consider all the relevant evidence and reach conclusions on the matter, but if I were to determine that a 5 year supply of specific, deliverable housing sites does not exist what would be the most appropriate way forward for the plan?

The most appropriate way forward would be to lower the target. The current target represents a huge increase over and above any building rate previously achieved in the District and represents a significant delivery challenge. We consider that there is already a strong risk that the District will fail to meet its 5 Year Supply, and will therefore be open to further rounds of speculative and inappropriate development.

(See CPRE West Oxfordshire response to Main Modifications consultation for further comment.)