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West Oxfordshire Local Plan 2031 - Stage 2 Examination

CPRE West Oxfordshire - Written Statement - Matter 7 - Providing New Homes

7.1 Is the identified objectively assessed need for new housing in West Oxfordshire of 660 homes per year for the plan period convincing and based on robust and up to date evidence?

CPRE's view remains that housing need in Oxfordshire has been exaggerated and considers the target set in clause 5.15 & Policy H2 is too high, for the reasons set out in our response to the Main Modifications consultation.

If the Council is minded to go ahead, an early review is essential. The review should exclude an upwards adjustment, but consider whether the target does exceed the demand and need, as suspected by CPRE and indeed many. CPRE suggests an earlier review than the 5 year timeframe suggested in clause 1.7. Should the target prove to be above the need, then 'spare' allocations without permission could be dropped or carried over to the next Plan Period to avoid unnecessary harm moving forward.

7.3 Should the plan's housing requirement figure be clearly identified in the plan as a minimum requirement?

No, absolutely not - it should be considered as a maximum. 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.

7.4 Is it justified to only permit a housing development on non-high environmental value, undeveloped land within the built-up area (and which accords with other plan policies) if it is necessary to meet identified needs?

Yes. Development on high environmental value sites should be avoided, otherwise harm would outweigh benefit.

7.6 Does the policy (and the plan more widely) provide adequate guidance on the density of residential development?

No. Policy H4 makes no reference to housing density and the Plan as a whole is almost entirely quiet on this subject, referring only to 'making efficient use' of specific sites.

Given the increased housing targets, CPRE considers that it is more urgent than even that development density should be reviewed. The housing mix proposed by the SHMA and noted in 5.63 (only 32.7% 1 & 2 bed, which is very similar to past figures- see clause 2.17) is not consistent with the occupancy assumed in deriving the target. If affordability is the real issue we are trying to address in the District, then we need small, high density units. Any land allocations made must deliver the maximum number of units and those units must be as affordable as possible. This can only be achieved via high density development. The mix of housing proposed does not maximise the land available, nor deliver the lowest cost housing that is clearly needed.

CPRE therefore proposes an urgent review of allocations to ensure that they are maximised. Specifically, it should be investigated whether the same number of houses could be built on less land, leaving space for houses for the next Plan Period instead of having to make additional allocations.

The most appropriate way to take this forward would be to develop a clear policy for densities.

In our view, such a policy should recognise the benefit of higher density in terms of reduced land take, less expensive housing, starter home provision, and climate change benefits through reduction of travel and of domestic energy use (closer houses need less heating). It should aim for a minimum of 45 per hectare (the mid-point of the old PPG3 guideline), but target the maximum density acceptable on every site, recognising that densities in London range from 65 per hectare up.

We also note the following from the recent Housing White Paper¹:

'1.53 To help ensure that effective use is made of land, and building on its previous consultations,⁴¹ the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should:

- *make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing requirements;*
- *address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations); that provide scope to replace or build over low-density uses (such as retail warehouses, lock-ups and car parks⁴²); or where buildings can be extended upwards by using the 'airspace' above them;*

¹ Fixing our Broken Housing Market, DCLG, Feb 2017

- ***ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs; and***
- ***take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances; for example, avoiding a rigid application of open space standards if there is adequate provision in the wider area.'***