

Oxford City Local Plan Pre-Submission Consultation December 2018 **CPRE Oxfordshire Response**

POLICY H1 - Scale of New Housing Provision (incl. supporting text paras 3.1-3.12)

CPRE Oxfordshire considers this policy to be unsound on the grounds that it is not justified, effective or consistent with national policy.

1. Housing numbers & Land supply

During the Plan period the City assesses its housing need on the 2014 SHMA (Strategic Housing Market Assessment) as 1,400 houses per annum, that is 28,000 houses. Although it has commissioned an updated and extrapolated SHMA which puts the figure lower, at 27,120, the City has decided to maintain the rate in the original SHMA, ostensibly because this has been used for the allocations in the Oxfordshire Growth Deal (of which more later).

Against that the City proposes to build just 8,620 homes within its boundaries, creating a notional “unmet need” of 19,380 homes. This arises however only because (see also our submission on densities and land use) the City is reserving land for new employment and building at inadequate densities on sites where housing is allocated. The 2016 HELAA listed 164 hectares of sites or part sites reserved for employment growth. CPRE calculates that switching that new employment land to housing would provide land sufficient for 12,300 homes at a modest density for Cities of 75 dph (dwellings per hectare). Added to the 8,620 dwellings proposed in the plan, themselves at improvable densities, this would have given the City a total housing capacity of 21,000 houses.

Further houses would result from an increase in build densities. At that time CPRE based its assumption of yield from density improvement on the City’s then apparent density assumption of just under 40 dph. Perhaps as a result of CPRE’s density campaign, the new NPPF requires Councils to set density criteria, with which Oxford has complied to a minimum extent. Although the housing background paper states that a final minimum density standard is proposed in Policy RE2, this is not the case; it contains only an indicative 100 dph in district centres. Similarly, although in the Housing Background Paper a range of densities for each category of site is given, the text makes it clear that this too is indicative, and indeed done against the Council’s best judgment under the duress of the NPPF. In calculating the capacities of HELAA sites, the lower end of those ranges has been used throughout.

The median of the lower range is 61 dph and the median of the mid-range is 69 dph. Simply moving to the mid-range median would therefore increase Oxford's capacity from 8,620 to 9,750. Targeting the top of the range would produce 10,880. In *Housing for a Compact City* Lord Rogers noted that Paris had an average housing density of 300 dph. Even building at half that density would increase Oxford's declared capacity to 21,200 homes and, taken with the 12,200 house potential of the employment land, to 32,400, well above even the SHMA total.

Of course, these figures are only indicative orders of magnitude of what could be achieved; but **the scale of the difference between the City's claimed and actual capacity is stark.**

Additional to that are employment sites that have been vacated during the Plan period but remain ring-fenced, and the number of dwellings arising from the Plan policy to allow dwellings "over the shop" neither of which are quantified.

However, the SHMA is now superseded by the new method of calculating OAN (Objectively Assessed Need). This defines the Government's household projections as "need" overlaying a percentage intended to address prices. Under the new OAN Oxford's actual "need" would be for just 11,000 houses during the Plan period, or 12,960 if the affordability uplift was included. Even the higher figure is less than half of the SHMA. Additionally, the Government rightly encourages Authorities to moderate their housing trajectories in respect of constraints like the Green Belt, conservation areas, flood zones all of which apply to Oxford.

Moreover, if a "housing first" strategy were adopted, by then far more of Oxford's current workers would have been accommodated within the City, and less new housing demand would have been provoked by throttling back the growth strategy, leaving demand and supply more nearly in balance. Homes built at the higher densities we propose would be less expensive to buy, addressing the affordability issue. The result would be that house prices relative to incomes, which are already falling due to market forces, would fall further during the Plan period

The household formation forecasts, 11,000 houses for the Plan period (itself a not unchallenging 20% growth on existing housing stock) should be the basis on which need, and if it were relevant any "unmet need", should be defined.

It is evident that on the revised Strategy basis we propose Oxford could accommodate far more than all the houses it actually needs within the present City boundaries, leaving spare capacity for future Plan cycles.

2. The Growth Deal

The underlying motivator of the Plan numbers is not directly the SHMA but, as the Plan states, that *Councils have received Growth Deal funding to deliver these homes*. The Oxfordshire Growth Deal is a contract between the Councils comprising the Oxfordshire Growth Board and the Government for the delivery of 100,000 homes in return for cash payments. In the contract the Government specifically acknowledges that this is in excess of its own estimation of Oxfordshire's housing need. It is in fact in excess of actual need by a factor of almost three.

The lawfulness of the Councils' agreement to the Growth Deal numbers is suspect as the underlying SHMA is consistently represented to the public as "need", whereas by the Government's own evidence it is not. There has been no consultation to determine whether

the public shares the Councils' apparent vision of Oxfordshire as an area for accelerated industrial and population growth. **In fact, all the evidence is that the public would expect a rural County like Oxfordshire, constrained by Green Belt and AONB, to be defending figures below the OAN, as the Government advises, rather than three times greater, as they are now taking the Government's money to do.**

CPRE is strongly opposed to sacrificing the countryside and Green Belt for no reason other than money, which is the effect of the Growth Deal, and of the District and City Plans, but our proposed reduction in Oxford's own housing need to a level based on the new OAN would not of itself affect the Growth Deal, which is County wide. It would merely transfer 15,000 houses from the City books to the Districts. This would not change the Districts totals, as these already include the same figure as allocated "unmet need". Our proposed change would however remove any imperative to, or exceptional circumstance for, District's releasing Green Belt land close against the City where it is most vital.

It would also lead to a contained City, balancing its own housing needs and employment, and a more sustainable City with less commuting and more integrated communities.

3. Affordable housing requirements

Para 3.7 states that the 2018 SHMA roll-forward identified an affordable housing need of 1,356 dwellings per annum.

However, the roll-forward document (GL Hearn's Oxford City OAN Update, Oct 18) is clear that this figure '*is a nominal figure based on a certain calculation*'. It states that it does not take into account housing that would be released by households moving to more suitable accommodation (Para 6.50) or the fact that the OAN already allows for newly forming households so these would be double counted (Para 6.51).

Despite this, repeated references through the Plan suggest that 1,400dpa is the figure required.

In fact, the conclusion of the OAN update is to identify a housing requirement of 776dpa - '*a strong basis for planning positively and takes into account demographic trends. It would also meet the identified economic growth and help to address local affordability issues*' (para 9.39)

This figure includes a 40% uplift to take into account affordability issues, as outlined in the Government's new standard methodology.

4. Oxford-Cambridge Growth Corridor

Para 3.7 also seeks to justify an increase in figures based on the proposed Oxford-Cambridge growth corridor. We note that this has not been subject to public consultation or any strategic environmental assessment, nor any robust political scrutiny. There is no agreed economic vision for the corridor and no clarity over the proposed spatial distribution of the intended growth. We reject entirely the notion that Oxford's Local Plan should be guided by this undefined, undemocratic and environmentally unsound approach.

Conclusion

The Plan should clearly identify the distinction between actual housing need (household projections) and the optional level of growth that the City is seeking to create.

The evidence base should reflect this with a clear analysis of the benefits/impacts of the higher figure and further public consultation undertaken on the basis of this.

As we show, a combination of increasing densities and switching land earmarked for potential future employment to housing could satisfy all the notional need in the SHMA/Growth Deal, and far more than the more appropriate new OAN formula.

However, the overwhelmingly important issue is that Oxford's Plan strategy of ratcheting up employment far in excess of housing is against the interest of both the City and the County and should be reversed.