

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

POLICY RE2 - Efficient use of land

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

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 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.

High Density housing does not need to be physically high. Indeed, tower blocks are an inefficient way of providing it. The Jericho District of Oxford is high density and low rise as well as being a sought-after location. It is perhaps indicative of Oxford's approach that high density St Ebbe's in the City Centre was pulled down to make a carpark and is now a modern and unsightly shopping mall.

The Government urges use of higher densities particularly where Green Belt might be at risk (as in this Plan). Higher densities also create more integrated communities; reduce both inter and intra City commuting; and enable the less expensive housing the City claims it is its key priority to provide.