



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Dear Planning Team,

Re: CPRE West Oxfordshire response on the Local Plan 2041 Focused consultation on Ideas and Objectives

CPRE West Oxfordshire welcomes the opportunity to comment on this stage of the Local Plan development.

Headline areas of concern:

- **It is difficult to make constructive comment on the housing scenarios when the report gives no indication of the number of houses involved.** WODC should not use the overinflated and highly criticised housing numbers presented by Oxford City and Cherwell in the recent REG 18 Part 2 consultation, the HENA report. In this report Oxfordshire's population growth is forecast to grow by nearly 27% by 2040, in comparison to ONS estimates that the UK population will see an increase of less than 5%. Therefore, Oxfordshire could only achieve this level of growth at the expense of significant in-migration from elsewhere in the country, which is contradictory to the Levelling Up agenda. The high levels of migration into Oxfordshire during the five years 2015-2020, 2,752 per year, are assumed to continue for the next 20 years. Given our current economic difficulties and trend towards hybrid and home working, this is unrealistic. It would certainly be more reasonable to base the projections on the ten-year period from 2010 to 2020, this is 2,280 a year, 17% less. Additionally, Oxford City is prioritising brownfield sites within its boundaries to employment, rather than homes, assuming the excess housing needs will be met by the outlying districts. WODC should strongly resist taking the excess housing need identified by Oxford City in the HENA. For West Oxfordshire, this is an additional 564 dwellings per annum (*Source : Table 2.1 Oxford City Reg 18 Part 2 consultation document*). WODC must "push back" that these forecasts are both excessively high and that more homes could be accommodated within the city. **The West Oxfordshire Local Plan should consider and meet the genuine housing needs of those living in West Oxfordshire only.**
- Renewable energy is desirable in principle, but not at unacceptable cost to the countryside, our rural communities, or to the economy. Highlighted in the previous consultation as very important was the need to develop renewable energy "**subject to there being no harmful impact on the countryside**". CPRE West Oxfordshire would like to see this wording built into the relevant objective (Objective 2) and a strong rooftops /brownfield first policy.



General comments on Objectives

CPRE West Oxfordshire are generally supportive of the objectives and have commented using the online portal on each. What is required now is robust, watertight policies to back these up and prevent developers from gaining “wiggle room” to overcome. Specifically, policies which:

- Put brownfield sites first.
- Protect the Oxford Greenbelt and AONB from development, except in genuinely exceptional circumstances.
- Support the emerging Oxfordshire Nature Recovery Network and clearly embeds this into development planning policy.
- Support the Oxfordshire Local Nature Partnership in calling for a clear requirement on all forms of development to deliver a 20% net gain in biodiversity.
- Protect the countryside in general, especially land currently used for food production from development.
- Make the most of the housing stock we have, by easing regulations around extensions, annexes, splitting of larger homes, changing use from retail in dormant town centres to homes.
- Reduce land take with increased density.
- Focus on the need for smaller 1 and 2 bedroom homes.
- Deliver a proactive dark skies policy – such as reducing energy use for streetlighting (sensor approach)
- Require solar power and heat source pumps on all new buildings moving forward.
- Support the commitment to meet the Climate Change Commissions target of increasing hedgerow by 40% by 2050.
- Commit developers to maintain green spaces and hedgerows for a minimum of 5 years.
- Allow no developments that rely on draining water into rivers and watercourses.

We would also like to see WODC develop a renewables strategy and plan, rather than having to react to developer led applications.

General Comments on Housing Scenarios

CPRE West Oxfordshire have commented using the online portal on each scenario. Overall, our favoured scenario is Scenario 1, a hierarchical approach, with the caveat that there should be a brownfield sites first policy, no development on the Greenbelt or in AONS and a general protection of the countryside, with village development being led by need and within the settlement boundary.

We also raise the following general comments:

- It is difficult to constructively comment when no indication of actual housing numbers is given.



- West Oxfordshire should base housing numbers on the ONS (Office for National Statistics) latest housing projections uplifted in line with the **Government's current standard method** requirements to produce the minimum realistic housing trajectory, and **not be influenced by the HENA report**, in the Oxford City reg 18 Part 2 consultation, which is unrealistically inflated and highly criticised. We attach as an Appendix 1 CPRE's consultation response to the HENA report.
- Whichever scenario is favoured, a brownfield sites first policy should be adopted.
- Whichever scenario is favoured, there should be **No development in the Oxford Green belt or AONB**. In addition, there is a need to protect the countryside generally. The amount and environmental value of land taken for developments should be minimised; and where development occurs it should sensitively located, sustainable, appropriate to need, and the land take proportionate.
- Housing development to come forward at the highest realistic density in each location, with a yardstick target of at least 70 houses per hectare.
- It is our view WODC should resist the HENA housing numbers strongly and put pressure on the City to allocate their brownfield sites within the city to homes rather than employment. See: <https://www.cpreoxon.org.uk/news/oxford-citys-growth-agenda-threatens-countryside/>
- All new build should as a mandatory requirement include latest energy and water efficiencies as standard; solar, air pumps and water storage as standard.
- All new developments should include hedgerow and green spaces which the developer **MUST** maintain for a minimum of 5 years.
- Only 1 and 2 bed properties are needed. That will use less land and naturally free up the large number of family houses that already exist in the District. Flats with shared green spaces are ideal and the most efficient.
- There should be a positive policy for Annexes and accommodation for the elderly and these properties should be counted in the figures.
- Extensions make a contribution and should be counted.
- Sub-division of large houses should be encouraged.
- New housing should use loft spaces to limit land take and parking should be directly below the building.

CPRE West Oxfordshire would welcome the opportunity to discuss our response with you.

Yours faithfully,

Philippa Phelan
Chair West Oxfordshire CPRE District



APPENDIX 1 CPRE response to the Oxford City , Reg 18 Part 2 consultation- the HENA report

Oxford Local Plan 2040 – Reg 18 Part 2 – Housing Needs – Online Survey – CPRE Oxfordshire Response FINAL

Are there other ways of identifying housing need that should have been considered?

YES.

CPRE recognises and supports the need to provide housing to all that need it, and that it should be affordable to those who wish to buy or rent it. Likewise, we support economic growth necessary to ensure a prosperous future for our country. That said, both these uses of land would be competing against other essential uses of the land, notably for growing the food we need, preserving and protecting Green Belts and Areas of Outstanding Natural Beauty, wildlife sites and Nature Recovery areas, providing recreation, and protecting valued landscapes at a national and local level for the good of everyone. Therefore, we seek to ensure that land use for housing and economic growth is minimised by containing numbers to that which is truly necessary as well as building at higher densities which not only reduces land use but provides less expensive homes and more self-sufficient communities.

The current Government consultation on planning reforms indicates their support for plans that ‘*can provide for sufficient housing and other development in a sustainable manner*’ and that there may be ‘*exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need*’.¹

It would at least be worth exploring an alternative methodology lower than the Standard Method, based on meeting only the genuine need for affordable housing rather than top-loading with market housing.

The justification given for not providing such a scenario makes no sense, either grammatically or in actuality: Para 2.24 “*The affordable need is not the basis of a scenario because of the challenges of creating a housing need scenario based on affordable housing need it is not used as the basis of a scenario*”.

Our assessment would be that given the constrained nature of the City (Green Belt, floodplains, limited river crossings, medieval layout), there would be justification for a lower figure that focused purely on addressing actual need which the City identifies as 740 dwellings per annum (Table 2.2).

A further option would be an assessment based on low internal migration, supporting the Levelling Up agenda, and instead focusing on upskilling existing residents and improving productivity.

¹ NPPF Draft Text for consultation -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1126647/NPPF_July_2021_-_showing_proposed_changes.pdf



It would be irresponsible to release more land than is necessary for housing, given the other critical ways in which we need and use the land.

Do you have any comments on the methodologies used in the HENA?

YES.

1. **Standard Methodology** – Of the options presented, this would be our preferred option. We note that this already makes a considerable allowance for affordable housing – increasing the baseline figure by 997 dwellings per annum.
2. **Census-Adjusted** - The Government's Standard Method is still what is recommended by national policy. It seems rather arrogant of the HENA authors to be suggesting that they can arbitrarily change the inputs to this from the 2014 figures (admittedly very out of date but still mandated) to the 2021 Census.

The Government has made it clear that it will review the Standard Method once all the relevant information from the Census has been released. The HENA 'Standard Method Adjusted' scenario is based on the Census population figures but that is different to household projections which will be influenced by a number of factors and have not yet been released.

3. **Cambridge Econometrics (CE) baseline** - Overall, the level of growth proposed in this scenario is over 50% more than the growth experienced in the previous period:

Extra households, 2011-21 Census 29,253²

HENA Cambridge Econometrics 2022-2032 - 44,060 households (+50.6%)

We contend that this is not deliverable or sustainable.

4. **High Economic Development Led Scenario** – we support the Council's assessment that: *"there are potential downside risks to economic growth and it remains possible that macro-economic events and funding constraints may slow projects down or lead to some not progressing. Given the current economic uncertainties, this scenario is not considered to be the most appropriate housing need scenario"* (Para 2.14). We believe this logic could apply equally to the CE baseline scenario.

Do you have any other comments on the Scenarios?

² From 258,855 in 2011 to 288,108 in 2021



YES.

Overall, the approach behind the HENA assessment appears manipulated towards higher growth figures.

For example:

a) ONS 2014 Household projections for Oxfordshire taper off fairly rapidly from 37,301 in 2019-29 to 21,834 in 2029-39 i.e., 41% lower in the second decade. But the HENA assumes that the second decade will see the same growth as the first, which adds 26% to the figures.

b) The HENA averages net migration over five years up to 2020 and carries this forward. A 10 year average would be more appropriate, especially when forecasting two decades ahead. This would reduce the annual net migration figure from 2,752 per annum (HENA Table 3.11) to 2,287 per annum, a drop of 17%.

Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need?

YES.

Diversion from the Standard Method is premature given that the full Census results are not yet available and that this is still the Government's mandated methodology. However, if it is to be reviewed, this should also be in the light of other urgent considerations – in particular our biodiversity and climate emergencies.

We give little credence to the LEP's Investment Plan as this was produced behind closed doors and not subject to public consultation or constrained by any consideration of its environmental or social impacts. It is in effect just a marketing document / wishlist and is not an appropriate basis on which to make long-term projections.

The Levelling Up agenda is ignored throughout the HENA but requires serious consideration. The CE-baseline model is based on Oxfordshire's population increasing by nearly 27% by 2040. This compares to ONS estimates for UK population increase of less than 5%. Therefore, Oxfordshire could only achieve this level of growth at the expense of significant in-migration from elsewhere in the country.

A level of pragmatism is also required as to what is actually deliverable. The Oxfordshire Housing & Growth Deal set a target of 5,000 dwellings per annum (dpa) across the county. In the period since 2011, the average delivery has been only 3,865 dpa. For Oxford, average delivery is only 288dpa against a target of 550 dpa. Given the current economic outlook, it seems highly unlikely that there will be much change in this situation in the foreseeable future.

Overall, we do not accept that the City Council has established the exceptional circumstances required for deviating from the Standard Method.



Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

YES.

It is completely inappropriate for Oxford City to be seeking to dictate both the housing numbers and their geographical dispersal to other local authorities in this way. The City should constrain itself to assessing its own needs and capacity.

We note that using the 2040 employment pattern maximises the share for Oxford (30%) and, given capacity constraints, will therefore maximise the overspill to the other four districts and increase pressure on the Green Belt. Using the Standard Method base would reduce Oxford's share to 22.5%.

Do you have any comments about the housing mix including the need for specialist housing and affordable housing?

YES.

Land is a scarce resource and needed for many uses, including climate mitigation and food production. If we are to give it up for housing, we must ensure that this meets the real needs of local residents.

Whilst the Government definition of 'affordable' continues to stretch to cover dwellings provided at 80% of the market rate, it is clear that so-called affordable housing in Oxford will continue to be out of reach for most households. We recognise that this is not entirely within the City Council's control but would support any moves to increase the focus on genuinely affordable housing that is available in perpetuity for the local community.

The sad fact is that a need for housing does not equate to being able to afford to either rent or buy a dwelling. The HENA does look into the question of the need for social and affordable housing but provides no insight as to how those on low pay will be able to afford homes in the absence of funding for social housing. Supporting further above-trend economic migration to Oxfordshire will simply exacerbate the current situation.

Do you have any comments about the assessment of housing capacity?

YES.

The City is currently squandering opportunities to develop housing on large-scale city centre brownfield sites.

Research by CPRE has revealed that over four key urban sites within the City, estimated figures suggest the creation of 14,015 jobs but only 714 homes (see Table 1 below). Clearly this trajectory will considerably up pressure on housing supply, which could then only be met by releasing far less sustainable greenfield / Green Belt sites away from the City.

Table 1 – Jobs v Housing in Oxford



SITE	No. of JOBS	STUDENT Accommodation	HOMES
Oxford North	4,500	-	480
Botley Road	1,750	-	0
Osney Mead	4,000	600	-
Oxpens	3,765	258	234
TOTAL	14,015 jobs	858	714 homes

The City should re-prioritise its policy to focus on the delivery of high density housing. If landowners (including the colleges) do not wish to release land in this way then the City should not be afraid to consider compulsory purchase options.

It seems that Oxford City Council is keener on asking neighbouring District Councils to sort out its housing problems than trying to do so itself. Presumably because it keeps a substantial amount of the business rates received, it seems happier to attract new commercial development and likewise to offload the financial burden of providing services for new homes and their extra residents.

Do you have any comments about this conclusion to our approach to assessing housing need and setting a housing requirement in the Oxford Local Plan 2040?

Overall, we do not believe the approach Oxford City is proposing is compatible with the [Oxfordshire Strategic Vision](#) which commits all our authorities to planning for ‘good growth’ that is both sustainable and inclusive.

We recognise that the City Council is committed to trying to find affordable housing solutions for its residents and to supporting the world-class education and research offered by our universities. However, this must not come at the expense of Oxfordshire’s environment, which in fact underpins the health and wellbeing of both residents and the economy.

This ongoing level of growth would have major consequences for Oxfordshire’s environment and quality of life but these appear to be completely off the Council’s radar when it comes to assessing the housing requirement. It is taken as read that the housing numbers spat out by the Cambridge Econometrics Model to support growth must be carried forward as a requirement. However, there are numerous other factors that can and should be considered when arriving at a final housing requirement figure. For example:

- How does this approach relate to the Council’s Net Zero strategy? What are the carbon consequences – both embedded and ongoing – of this level of housing?
- How likely is it that this level of housing growth will actually meet the read need for genuinely affordable housing and should the focus be on ‘what’ rather than ‘how many’?
- What are the consequences of this exaggerated proposal for growth for tackling our biodiversity emergency?
- How can education, health, water and transport infrastructure keep pace with this above trend growth?
- How does this approach sit alongside the Levelling Up agenda, since it is based on pulling in migrants from less affluent parts of the UK?



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We ask the City Council to re-consider its chosen trajectory and to work in collaboration with its neighbours to identify a more sustainable long-term approach.

Land is a vital but scarce resource. We cannot afford to release more of it for housing than is absolutely necessary when it is also required for other vital issues such as climate mitigation, food production and the health and wellbeing of people and nature.