

## South Oxfordshire Local Plan 2011-2033 - Final Publication Version:

### Consultation

11 October - 22 November 2017

### CPRE Oxfordshire's initial concerns and recommendations

#### Overall comments:

**1. Oxford's unmet need is unsound.**

There is no evidence that any houses are needed to meet Oxford's unmet need at all, much less the arbitrary 3,750, and it is unsound for the Plan to contain them.

**2. It is unsound to plan for a surplus.**

The Plan allocates land for the provision of 1,500 houses *over and above* the figures from the Oxfordshire Strategic Housing Market Assessment (SHMA), which are already overstated. Over-allocation of land does not mean developers will build more houses - it just allows them to cherry-pick the 'best' (often greenfield) sites.

**3. The SHMA itself is now unsound.**

The Government's new proposal for calculated housing need, if accepted, would give a need figure for the District 3,000 houses lower than the SHMA-based total in the Plan - making the much higher SHMA totals unsound.

**4. It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.**

Land should be used as sparingly as possible to preserve the rural environment. The District already has a large stock of wasteful low density executive houses - the crying need is to balance the whole housing stock with lower cost, smaller houses, at higher densities, maximising use of expensive land.

**5. Taking land from the Green Belt is unjustified.**

The Green Belt removals are unsound as there are no exceptional circumstances to justify them. This applies to the proposed Green Belt incursions at Berinsfield and Wheatley, and the huge unjustified strategic allocation at Culham.

**6. The Chalgrove development is inappropriate and potentially undeliverable within the timescale of the Plan.**

The proposed development at Chalgrove airfield will swamp the existing village of Chalgrove and neighbouring villages.

**7. ‘Not mentioning the Expressway’ itself makes the Plan unsound.**

Although it is mentioned in the Plan, the potential magnitude of the proposed Oxford - Cambridge Expressway Growth Corridor is not indicated, nor that the South Oxfordshire Green Belt seems to be the County Council’s preferred target area.

**1. Oxford’s unmet need is unsound.**

It is unsound to include Oxford’s unmet need which is only a figure plucked from the air with no evidence even from Oxford itself to support it. The City has made no prediction of how many houses it needs, nor of how many it could build itself. Its current draft Local Plan contains no such hard numbers. What’s more, the new official Government calculation for Objective Assessed Need (OAN) shows that Oxford in fact only needs 15,000 houses, half the level the discredited 2014 Strategic Housing Market Assessment (SHMA) had forecast. On CPRE Oxfordshire’s calculations, Oxford could not only build all those itself (using higher densities and land currently earmarked for employment purposes), but have land left over for the next Plan cycle as well. Unevidenced figures should not be included in Local Plans especially when they are being used to inflict harm on the countryside.

## **2. It is unsound to plan for a surplus.**

It is unsound to plan for a surplus against a housing target which will never be met in any case. Moreover, if the Plan goes ahead with a surplus, too much land will have been intentionally allocated and be cherry picked by developers, doing nothing for five-year supply. If the 3,750 (allocated for Oxford's unmet housing need) and the 1,500 (surplus), amounting to a total of 5,250, were removed from the Plan (a quarter of the Plan total), it would enable the Council to do away with the need for development at Culham and Chalgrove.

## **3. The SHMA itself is now unsound.**

The Plan is based on the 2014 Strategic Housing Market Assessment (SHMA) which is itself unsound, as CPRE Oxfordshire has said since it was first published. It was never an assessment of housing need as it was sold to us, in the sense of local people needing houses, but a tool by which the Oxfordshire Growth Board and Local Enterprise Partnership (LEP) were able to justify industrialising our rural County, attracting tens of thousands more people into the area by building houses for them.

The Government has now accepted as much by publishing much lower housing need figures for Oxfordshire, in SODC's case reduced by 20%, in Oxford's case halved (to just 15,000). The Plan should be recalculated on the new OAN numbers to remove the further excess of 3,000 houses (that is a total removal of 8,250 including the Oxford unmet need and the built-in surplus) and if necessary delayed to enable the District to take advantage of the new OAN regime.

## **4. It is neither sound, nor positive, to plan without a target density to make best use of land and provide more affordable housing.**

Although it is good to see that the Submission Plan now includes a much-needed statement about the need for higher densities, it is unsound not to spell out a density target. We will not get cheaper houses just by planning for ever higher numbers builders will never build. The only way is to specify higher build densities. We have enough low density high cost houses already; let us use the Plan to add high density low cost houses to the mix. We recommend that a fixed target density of 60 houses to the hectare, higher in towns, be set against which developers will have to show exceptional circumstances to fall short, and be rewarded, perhaps through the Community Infrastructure Levy, for exceeding.

### **5. Taking land from the Green Belt is unjustified.**

The Plan proposes to remove a large area of land from the Green Belt at Culham; a smaller but still strategic piece at Wheatley, and to build out the Brookes University Campus at Wheatley beyond the previously developed area - there are no exceptional circumstances to justify any of these incursions.

As shown above, the housing requirement is overstated. In any case, Green Belt sites should be released only in exceptional circumstances and when all alternatives have been found even more unacceptable. That is not the case here.

### **6. The Chalgrove development is inappropriate and potentially undeliverable within the timescale of the Plan.**

This countryside site, regardless that it was chosen for a wartime airfield and is therefore partly previously developed, is not suitable for a major housing development. It has poor accessibility and there must be concerns, because of the size of the proposed development and the infrastructure needed to support it, whether it is deliverable within the timescale of the Plan.

### **7. ‘Not mentioning the Expressway’ itself makes the Plan unsound.**

The ‘elephant in the room’ is the proposed Expressway Growth Corridor. Another growth scheme likely to be imposed on South Oxfordshire, and itself based on growth figures even higher than the discredited SHMA, this would be a new “motorway” through the Green Belt and another 100,000 houses for incomers. It would be far and away the biggest planning event during the Plan cycle, causing the most harm to our environment and amenity, but gets mentioned only in the footnotes. It is unsound not to spell out the scheme and its implications, in the Plan.