

# WEST OXFORDSHIRE LOCAL PLAN: HOUSING CONSULTATION PAPER - July 2014



This is the response of Eynsham Parish Council to the Consultation Questions

## Plan Period

*1. Do you agree that the period 2011 - 2029 is a reasonable period of time for the new West Oxfordshire Local Plan to cover? If not, what period should the plan cover and why?*

The Parish Council agrees.

## Proposed Housing Target

*2. Do you support the proposed Local Plan housing target of at least 9,450 homes to be provided in West Oxfordshire over the period 2011 - 2029 (525 per annum)? If you do not agree with the proposed target, please explain why and identify which alternative target you consider should be used.*

The Parish Council cannot support the proposed target. The Parish Council agrees that the SHMA projections are flawed in relation to West Oxfordshire as over delivery during the analysis period distorts the SHMA models both with regard to projected housing delivery requirements and inward migration. This is admitted in SHMA (3.71, 9.17 and 9.62). The projections should be lower than SHMA.

The HCP correctly points out that SHMA does not address matters such as housing land availability, infrastructure capacity or the sustainability appraisal. However, these are not adequately addressed by the Council in the HCP either, other than listing these as possible constraints on development.

As for housing land availability, the HCP housing projection relies on the dwindling number of suitable and deliverable SHLAA sites together with hoped-for windfall sites. While these sites have been registered with the SHLAA and assessed as suitable and deliverable by the Council, this does not mean that they will be viable in the future when required or that the landowners will actually decide to develop.

The most important constraint on future housing development is the infrastructure to sustain it. Assumptions in the June 2014 update to the Infrastructure Delivery Plan (IDP) with regard to such matters as transport, water and sewage, primary and secondary education and primary health care in West Oxfordshire are not borne out by the experience of residents in the Eynsham area. More details are provided in the responses to Question 17.

Any revision by the Council of the SMHA figures should also be supported by adequate consideration of actual land availability and deliverable infrastructure capacity in all the areas included in the Draft Local Plan.

### **Proposed Spatial Strategy**

*3. Do you agree with proposed spatial strategy outlined in paragraphs 5.15 - 5.19? If not, which alternative strategy do you think should form the basis of the new Local Plan?*

The Parish Council supports the general spatial strategy set out in paragraphs 5.15 and 5.17-5.19. The Parish Council does not support the proposal set out in 5.16 for the reasons set out in the replies to Questions 2 and 17.

### **Eynsham - Woodstock Sub-Area**

*17. Do you support the overall level of housing provision identified for the Eynsham - Woodstock Sub-Area (1,350 new homes)? Please expand as necessary.*

The Parish Council cannot support the proposed level of housing provision. As highlighted in the reply to Question 2, in making this projection for 1,350 new homes, the Council has failed to adequately, or in some cases at all, consider the constraints imposed by housing land availability, environmental considerations, infrastructure capacity or the Council's own Sustainability Appraisal (SA), or its own Infrastructure Delivery Plan (IDP).

Of the proposed provision for the Sub-Area, the new housing availability allocation for Eynsham (250) is identified in the June 2014 update of SHLAA (at 3.3, Table 1). Out of the dwindling number of listed sites, only two are considered suitable, developable and achievable.

Site 179 is proposed for 200 dwellings. Using the guideline of 30 dwellings per hectare, this 6.6Ha Site is unable to sustain that number. SHLAA says it has potential only for development on the southern half of the site, but the southwest of this is in Flood Zone 2 and 3. SHLAA also states that 'access is a key constraint', which has been noted in detail in previous SHLAA updates.

The only other Site is 187a, allocating the remaining 50 dwellings. SHLAA states this is only suitable as part of a larger, comprehensive development, suggesting it could be part of a development with Site 179, with which it has no physical connection. SHLAA also states that 'access is a key constraint'. Previous applications to develop this site as part of Eynsham Plant Centre have highlighted the access problems with the A40.

The most important constraint on future housing development in the Sub-Area, and Eynsham in particular, is the infrastructure to sustain it:

The HCP fails to consider the transport constraints. The Draft Local Plan allocates 6,000 new homes in Witney and Carterton, all of which will be dependent on the A40 for access to Oxford and the east. This increase will have a direct impact on the proposed 1,350 houses in the Eynsham-Woodstock Sub-Area as the A40 runs right through the middle of it. The Council's IDP, says (at 3.3) 'Traffic volumes are highest on the A40 between Witney and Oxford and the A44 south of Woodstock to Oxford. The most severe congestion is on the A44 at the Bladon roundabout and on the A40 to the east of Witney, particularly during the morning peak hours. The Council's July 2014 SA at Appendix 1 quotes the 2001 Census saying as far back as then, 60% of West Oxfordshire residents travelled to work by motor vehicle and 7,100 commuted to Oxford. The problem has become significantly worse since. The SA further says (Appendix 1, at 43) 'Oxfordshire's worst congestion problem is located in West Oxfordshire - the A40 Witney to Oxford and is identified in the Oxfordshire Local Transport Plan (OLTP) as a high level congestion problem. The SA (Appendix 1, at 44) also states that of the six local congestion problems in West Oxfordshire identified in the OLTP, half are in the Eynsham - Woodstock Sub-Area; Swinford Toll Bridge, Oxford Road-Witney Road-Acre End Street in Eynsham, and the A44 Bladon roundabout. And it will get worse still under the proposed Local plan until the Council makes transport a material consideration in future development plans of any size.

The HCP fails to take the constraints on the social infrastructure into consideration. As for primary education, the IDP (at 4.10) says 'Throughout much of the District primary schools are either already under pressure or are forecast to fill as pupil numbers are increasing'. The one Eynsham primary school is already turning away children moving into the village, despite a recent expansion program. the IDP (at 4.13) says, 'Where schools are at or reaching capacity, even relatively small additional housing developments can be difficult for village schools to accommodate. This provides a limitation on the extent to which significant levels of development can be dispersed to rural communities'. While the IDP does say that future housing development will be expected to contribute towards increasing school capacity where necessary, the present situation has been reached despite substantial funds being secured as referred to in the IDP Schedule.

As for secondary education, the IDP states (at 4.20) that 'Given the scale and distribution of growth envisaged through the Local Plan housing consultation (July 2014) it is not expected that there will be any significant capacity issues arising in the more rural parts of the District. It should be noted in this consultation then that Bartholomew School in Eynsham is already over-subscribed. The s106 contribution referred to in the IDP Schedule is noted but the adequacy of this to justify the statement at 4.20 is questioned.

The HCP, and indeed the Council, does not take the constraints to development of primary healthcare facilities in the Eynsham - Woodstock Sub-Area into consideration. Except for a passing reference in the IDP to discussions regarding the relocation of the Woodstock practice, primary healthcare in the Sub-Area is completely ignored. It should be noted for this consultation that the Eynsham Health Centre has reached the capacity point so that it is

now rationing appointments and patients are being forced to travel to its branch in Long Hanborough, which itself is the subject of substantial proposed development.

There is a perceived view among Eynsham residents that the much extended sewage system is not adequate to support additional development. It is alleged in the IDP (at 3.70) that there are no supply issues identified in the Eynsham area although it is conceded that sewage capacity upgrades may be required to support future growth. Notwithstanding this there is no corresponding plan in the IDP Schedule of Future Infrastructure Requirements.

*18. Are there any other sites not identified that you think should be identified within the Eynsham - Woodstock Sub-Area to help meet the overall housing requirement?*

As the Council has decided to reserve any allocations for the Eynsham-Woodstock Sub-Area for a follow-up Local Plan Part 2, the Parish Council cannot comment on a document which has yet to be published for consultation. The Parish Council is currently consulting the residents of the parish on a proposed Neighbourhood Plan and must reserve proposals for additional sites, if any, until it is decided whether or not to proceed with the Plan.

### **Business Land Provision**

*21. Do you agree with the overall level of business land provision identified in the emerging Local Plan (60 hectares)?*

The Parish Council agrees that of the four options considered in the Sustainability Appraisal, a total of 60 hectares is the better option, in light of the proposed revision of housing figures and projection of economic growth. The distribution of provision is questioned. While it is stated that organic expansion has historically accounted for around 25% of business land supply in the past (HCP 7.5) the unallocated requirement of 25 hectares constitutes about 42% of the total provision.

Various assessments relied upon in the HCP agree that over provision during the Local Plan period could be as damaging as under provision. There is concern that not enough consideration has been given to existing business sites. While this is provided for in Core Policy 11, a greater priority should be given to renovation and replacement of obsolete, unused or underused existing premises and sites before new land is allocated, particularly land which is greenfield or has to date been used as public amenity land.

Eynsham is an important employment site. It is second only to Witney in the District for employment floorspace for offices, factories, workshop/vehicle repair and warehouses. The West Oxfordshire Commercial Property Register for June 2014 lists 53,233 sq ft (4,945.34 sq m) being available.

There is also too little consideration in these allocations for the provision of infrastructure to support new businesses, particularly transport (including access to sites and commuting of employees). This should be a material consideration on the placing and size of any allocation.

*22. Do you agree that there is a need to provide additional business land in Carterton to attract inward investment?*

The Parish Council agrees. Given the high level of proposed housing in the Carterton area together with the large percentage of existing employees commuting out to work using an inadequate transport system (A40), there is a good reason to provide additional business land to attract inward investment providing local employment.

*23. Do you support the potential option of using the District Council's playing pitches at Monahan Way for business use, subject to their replacement in a suitable location elsewhere? If so, where should the replacement pitches be provided?*

The Parish Council believes existing public amenity land should not be used for development unless the replacement provides equal or better access and facilities.

### **Affordable Housing**

*25. Do you agree that all schemes resulting in a net gain of one or more dwellings (except self-build) should be required to make provision for affordable housing either on-site or through a commuted sum payment?*

Subject to a fair and reasonable definition of 'self-build' and a fair and reasonable £per m<sup>2</sup> commuted sum, this may be an equitable policy which would allow the Council to meet affordable housing needs and not render development unviable.

In the previous consultation on affordable housing, the Parish Council said single dwellings should be treated separately from developments of 2 to 5 dwellings. The Aspinall Verdi (2013) study (AV) clearly targeted this category as 75% of units constructed in the previous three years were single dwellings (AV 5.5), even though the study admitted that this was a response to the current affordable housing policy of on-site provision everywhere in the District (Except Witney, Carterton, Chipping Norton and Eynsham) for developments of 2 or more dwellings (Local Plan 2011, H11).

Developments of 2 or over dwellings not for family use or self-build will in almost all cases be for financial gain of the landowner and builder. On these sites on-site affordable housing is much less viable as even the AV hypothetical models show. If these market value dwellings are to contribute to the provision of affordable housing, an exemption from CIL and a fair and reasonable commuted sum provides a known and calculable method of

securing this contribution. To provide flexibility, the landowner/builder should be given the option of contributing on-site or off-site provision (if viable) or a commuted sum.

*26. Do you agree that self-build housing schemes should be exempt from having to make provision for affordable housing (subject to self-certification)?*

The Parish Council agrees, subject to a fair and reasonable definition of 'self-build'.

*27. Do you consider that the threshold for on-site provision of affordable housing should be set at 6 dwellings, 11 dwellings or at a different level altogether?*

In the previous affordable housing consultation, the Parish Council agreed to a threshold of 6 dwellings with the following reservations:

Lowering the threshold for on-site provision could contribute towards the Draft Local Plan goals for affordable housing (Core Policy 8) and the NPPF regarding mixed communities. This is unlikely to have a significant impact on large national builders as the additional overheads can be spread across the company as a whole. There is concern, however, about the impact on the smaller regional and local builders who would be most likely to deliver housing development of 6 to 11 dwellings. These are also the builders who would be most likely to make the best use of available land and create dwellings more in character with the surrounding area.

The AV study's hypothetical modelling indicates this range is within AV's margin of 'viability'. But, the higher cost and risk to smaller builders could mean some developments are in reality seen as unviable and would not be built. To avoid a detrimental effect on the Draft Local Plan target, the provisions of Draft Core Policy 8 should be a flexible alternative, with consideration given to the revised mix and type of housing, a lower level of affordable housing, or a financial contribution (in money or land) for off-site provision of affordable housing.

As for the threshold of 11 dwellings, the current threshold for Eynsham is 0.5Ha or 15 dwellings.

*28. Do you agree with the proposals to seek up to 50% in the higher value area, up to 40% in the medium value area and up to 35% in the lower value area (as defined on Figure 8.2)?*

The Parish Council does not agree with the value area definitions. The current threshold for Eynsham is 50% for developments of 0.5% Ha or 15 dwellings.

29. Do you agree that in terms of tenure, the Council should generally seek two thirds affordable rented housing and one third intermediate?

The Parish Council agrees. In the previous affordable housing consultation the Parish Council said this split equates roughly with the underlying data base relied upon in the AV survey.

30. Do you agree that the affordable housing commuted sum should be calculated on a £per m<sup>2</sup> basis to be worked up alongside the Council's CIL draft charging schedule?

The Parish Council agrees to a fair, reasonable and proportionate commuted sum on a £per m<sup>2</sup> basis as opposed to the inequitable proposals in the Council's current draft charging schedule. The Parish Council objected strongly to the rates proposed in the Council's draft CIL charging schedule and still does so.

### **Housing Mix - Market Housing**

31. The most recent evidence set out in the Oxfordshire SHMA (2014) suggests that as a general guide, the Council should seek the following proportions of market housing:

4.8% 1-bed

27.9% 2-bed

43.4% 3-bed

23.9% 4-bed

Do you agree that this is an appropriate approach in West Oxfordshire?

The Parish Council agrees.

### **Housing Mix - Affordable Housing**

32. The most recent evidence suggests that as a general guide, the Council should seek the following proportions of affordable housing:

65% - 67% 1-bed and 2-bed

33% - 35% 3-bed and 4-bed

Do you agree that this is an appropriate approach in West Oxfordshire?

The Parish Council agrees.

## **Housing Provision for Older People**

*33. Do you agree with the measures outlined above and consider they will help to meet the future housing needs of West Oxfordshire's ageing population? Are there any other specific measures that should be introduced to help meet the future housing needs of older people in West Oxfordshire?*

As highlighted by SHMA, West Oxfordshire has a larger and faster growing elderly population than Oxfordshire as a whole and the worst supply of specialist housing (66 units per 1,000 persons 75+ as opposed to 133 units for Oxfordshire and 170 units nationally) and 85% of this is in the private market (HCP 10.13-15). At the same time West Oxfordshire has the highest projected need for specialist housing of any District in the County.

According to SHMA Table 6, West Oxfordshire has the lowest available sheltered housing for rent but the second highest sheltered housing for lease. There is no enhanced sheltered housing for rent and only 20 enhanced sheltered housing units for lease. There is no extra care housing at all. At the same time it is second highest for residential care and highest for nursing care when the demand for these facilities are predicted to decline.

The Parish Council supports the measures proposed in the HCP but the Council must make an effort to get the balance right for predicted future demand.

The most direct way this problem could be addressed with housing policy under the Local Plan would to require all, or a high proportion, of the affordable housing requirement to be compatible with or adaptable to specialist needs of the elderly.

## **Housing Provision for Younger People**

*34. In addition to securing a good and balanced mix of house types and tenures, providing more affordable housing and encouraging self-build, are there any other specific measures that the Council should be pursuing through the Local Plan to help meet the future housing needs of younger people in West Oxfordshire?*

The type and tenure of housing for younger people also bears a direct relationship to employment opportunities. As younger people will constitute the main supply of the workforce, more consideration should be given to a co-ordination of housing with business land allocation, support for the redevelopment of existing business sites and providing adequate infrastructure to create a sustainable work-life balance for persons entering the employment market. The availability of local jobs accessible from the appropriate type of housing would create a reduction in the necessity for commuting and inward and outward migration dictated by employment.

## **Housing Provision for People with Disabilities**

*35. Do you agree with the measures outlined above and consider they will help meet the future housing needs of people with disabilities in West Oxfordshire?*

The Parish Council agrees with the proposals. Housing for persons with disabilities should be addressed together with that of older people as they will be an increasing majority of those having specialist housing needs. Table 72 of SHMA estimates an increase from 2011-2031 in the number of elderly with dementia (109%) and with mobility problems (92.5%) in West Oxfordshire, which is the highest in the County.

## **Housing Provision for Black and Minority Ethnic Households**

*36. Other than in relation to the overall objectives of securing a good balanced mix of housing types and tenures, are there any specific measures the Council should be seeking to introduce through the Local Plan to address the needs of black and minority ethnic households in West Oxfordshire?*

The Parish Council agrees with the HCP proposals.

## **Housing Provision for Households with Children**

*37. Other than in relation to the overall objective of securing a good, balanced mix of housing types and tenures including market and affordable housing, are there any specific measures the Council should be seeking to introduce through the Local Plan to address the needs of households with children.*

Primary requirements for households with children are adequate and accessible schools and healthcare. These should be made material considerations in any new housing development plan, regardless of size. In Eynsham, both the primary and secondary schools are over-subscribed and turning away children moving into the village. The one medical centre has reached the point where it is rationing appointments.

## **Self-Build**

*38. Do you agree with the measures proposed and consider they will help to meet the future housing needs of those wishing to undertake self-build projects in West Oxfordshire? Are there any other specific measures that should be introduced to help meet the future housing needs of those wishing to self-build?*

The Parish Council supports the measures proposed, including exemption from CIL/commuted sum.

## **Travelling Communities**

*39. Other than the application of a criteria-based policy to deal with speculative planning applications and specific site allocations for travelling communities to be identified in the Local Plan (Part 2) document are there any other specific measures that the Council should be seeking to introduce to meet the future housing needs of travelling communities?*

The Parish Council cannot comment on a document (Part 2) which has yet to be published for consultation. With regard to planning applications the District Council could best meet the needs of both the travelling communities and the local community where such sites are based by seeing that the conditions attached to such consents are enforced.

DS for EPC September 2014