

GOSFORD AND WATER EATON PARISH COUNCIL (GWEPC)

Comments in response to the Cherwell Local Plan 2040 Regulation 18 Consultation Draft

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ALREADY PLANNED DEVELOPMENT, ITS IMPACT AND THE OXFORD GREEN BELT

Chapter 3 of the consultation draft includes the parish of Gosford and Water Eaton (GWE) in what is described as the 'Kidlington Area'. This area includes Begbroke, Yarnton, Kidlington and GWE, i.e. the locations for the 4,400 dwellings which were allocated in the Cherwell Local Plan Partial Review to 2031 (CLPPR). All these allocations are on land which was previously designated as Green Belt and they represent a huge loss of green space; open countryside; and blue green infrastructure, all in a relatively small area. They also all but remove the strategic Kidlington Gap which separates Kidlington from Oxford.

GWEPC has serious concerns around the impact of the CLPPR sites on local infrastructure and services including: flooding; waste water and sewage management and the effect on local rivers; water scarcity in dry summers; net zero carbon ambitions; health services including hospitals and primary care services; air pollution; traffic and congestion; and loss of biodiversity.

The CLPPR sites will be developed over the next few years but it is likely that the number of dwellings will increase substantially over the planned 4,400. For example PRA was allocated for 690 dwellings but outline planning permission is being sought for 800 dwellings i.e. 110 / 16% more dwellings than the site allocation. The impact on infrastructure and services may therefore be even greater.

GWEPC believes that there should be no more development in what is described as the Kidlington Area, particularly not in Gosford and Water Eaton, and certainly no further release of Green Belt for development.

GWEPC believes it is important for the Oxford Green Belt boundaries in Oxford to be maintained and supports Core Policy 44 as below:

Core Policy 44: The Oxford Green Belt

The Oxford Green Belt boundaries within Cherwell District will be maintained in order to:

- i. Preserve the special character and landscape setting of Oxford;*
- ii. Check the growth of Oxford and prevent ribbon development and urban sprawl;*
- iii. Prevent the coalescence of settlements;*
- iv. Assist in safeguarding the countryside from encroachment, and*

- v. *Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Development proposals within the Green Belt will be assessed in accordance with current government policy and other relevant Development Plan policies.

The Green Belt boundaries are intended to be permanent and to endure beyond the period of a plan. They have only recently been reviewed so GWEPCC considers that further Green Belt boundary changes would not be justified.

Our comments in relation to the Housing and Economic Needs Assessment below are also relevant. A choice to build more houses than are actually needed cannot be used to justify further harm to the Oxford Green Belt.

RESPONSE TO QUESTION 19: Do you have comments on the Housing and Economic Needs Assessment?

YES

i. How the Housing and Economic Needs Assessment came about: In March 2021 the Oxfordshire Growth Needs Assessment (OGNA) was published as part of the evidence base for the Oxfordshire Plan 2050 which was being prepared as a joint project by all the Oxfordshire Local Authorities.

In August 2022, however, the Oxfordshire Local Authorities issued a statement¹ saying that the Oxfordshire Plan 2050 had been abandoned. The Local Authorities had been unable to agree on the OGNA's assessment of housing needs for Oxfordshire so each Local Authority now had to assess its own housing need.

Oxford City Council and Cherwell District Council's approach to the issue of housing need was to jointly commission the Housing and Economic Needs Assessment (HENA) which was published in December 2022. Paragraph 1.1.1 of the HENA states: *"This study was commissioned by Cherwell District Council and Oxford City Council to prepare a Housing and Economic Needs Assessment (HENA) to inform their individual Local Plans. This follows work originally intended to inform the Oxfordshire Plan, which is no longer being prepared, although the Oxfordshire Growth Needs Assessment (OGNA), was published in 2021."*. As the underlined section of this statement explains, the HENA is based on the OGNA, the housing need assessment which had been the topic of disagreement among the Oxfordshire Local Authorities and was the root cause of it being abandoned.

ii. Housing need as calculated in the HENA – for Cherwell: The HENA does not use the Government's Standard Methodology to calculate housing

¹ <https://www.bbc.co.uk/news/uk-england-oxfordshire-62409240>: *the authorities said it was "with regret" they were "unable to reach agreement on the approach to planning for future housing needs. The Oxfordshire Plan 2050 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing needs will now be addressed through individual Local Plans for each of the city and districts," they said.*

need. Instead it uses its own methodology which, via a number of adjustments made by the consultants who prepared it, significantly inflates the housing need for both Cherwell and Oxford.

For example, Cherwell's housing need calculated by the Government's Standard Method is 742 dwellings per annum (dpa). However, Cherwell's housing need, as calculated in the HENA is 1009 dpa. This means that 267 (36%) more dwellings need to be built EACH YEAR in Cherwell as a result of it using the HENA instead of the Government's Standard Method.

iii. Housing need as calculated in the HENA for Oxford City and its implications for Cherwell: But on top of this, Cherwell is also proposing to build an additional 284 dpa for Oxford's 'unmet need'. However, this claimed unmet need for Oxford City has been inflated in a similar way to Cherwell's. Oxford City's housing need calculated by the Government's Standard Method is 762 dpa. However, Oxford City's housing need as calculated in the HENA is 1,322 dpa. This means that 560 (or 73%) more dwellings need to be built EACH YEAR in Oxford City as a result of using the HENA. And Cherwell appears to be willingly proposing to take 33% of Oxford's inflated claimed unmet need.

iv. Effect of using the HENA on housing need figures: The overall result of Cherwell's decision to use the HENA instead of the Government's Standard Method as a means of assessing its housing need is therefore a very substantial increase in the number of dwellings that need to be built in the District to 2040. In fact Cherwell is planning to build 5,340 more dwellings than it needs to for its own housing need, PLUS over 4,100 houses for Oxford City's claimed unmet need which has been inflated by the HENA (73% inflated unmet need x 284dpa x 20years). $5,340 + 4,140 = 9,480$ more houses than the Standard Method.

v. Affordability: This is undoubtedly an issue in Oxfordshire but there is no evidence that building more houses results in a lower price. Moreover, the Government's Standard Method already includes a 40% uplift to address affordability concerns.

vi. Oxford City's capacity: Oxford City Council has been criticised for the allocation of large sites within the city for employment uses rather than housing. Examples include Oxford North (4,500 jobs but only 480 homes) and Oxford's West End. Before willingly accepting such a large proportion of Oxford's claimed unmet need, Cherwell should require the City to reassess its housing capacity, looking at the housing provision on sites such as these.

vii. Oxford City's consultation on housing need (as based on the HENA) and the views of other Oxfordshire Local Authorities: From February to March 2023 Oxford City Council undertook a Regulation 18 consultation focused on housing need and the HENA. South Oxfordshire District Council (SODC), West Oxfordshire District Council (WODC) and Vale of White Horse responded to this consultation and were highly critical of the HENA and in particular its methodology which inflates Oxford's housing need. Here are some of the comments made by those Local Authorities:

Extracts of Comments

SODC

“The Government sets out in the NPPF/NPPG that it expects all authorities to follow the Standard Method or provide an exceptional circumstance for doing something different. The NPPF and guidance doesn’t say the Standard Method is adjustable. The Standard Method is the Standard Method, the clue is the name. It’s a set formula for all local authorities in England, with set inputs, and it isn’t something to be corrected or doctored or something that can be manipulated to support a particular view of the world.”

“We are opposed to the HENA methodology and the choice of scenarios, as well as the wider Oxfordshire geography that the evidence covers without our involvement or consent, and the distinct lack of evidence for Oxford City itself. The three additional scenarios tested are unnecessary and inappropriate because there is no robust justification for departing from the Standard Method to determine housing need.”

“We have explained under question 1 above that we do not consider the Standard Method to be an adjustable calculation, as have Government in the NPPF consultation. It’s the Standard Method. We do not consider your apparent dislike of the Standard Method results constitutes an exceptional circumstance.”

WODC

“It is imperative that the City Council does all it can through the Local Plan 2040 to increase the supply of new housing coming forward within Oxford itself.

The most appropriate housing need scenario is that which is advocated by the NPPF – the standard method.”

Vale of White Horse

“This latest consultation continues to try to justify a housing need above the standard method. It has also published unsubstantiated housing need evidence for other areas in Oxfordshire using consultants and methodologies that are known to be a point of discord, and without any offers of engagement.”

These comments, made by expert officers in other Oxfordshire Districts indicate that these Local Authorities strongly oppose the HENA’s adjustments to the Government’s Standard Method and they question its use to justify a higher housing need. Why therefore has Cherwell used it as the basis for its housing need?

viii. 5 year housing land supply: As with other local authorities, Cherwell must be able to demonstrate that it has a 5 five year housing land supply. The more dwellings that Cherwell commits to building, the more difficult it may be to do this, particularly because Cherwell cannot control the developers who will develop the sites at a time that suits them rather than at a time that suits Cherwell.

However, the consequences of not having a demonstrable 5 year housing land supply can be harmful by allowing speculative development proposals which lie outside the local plan allocations to be successful. This defeats the purpose of the local plan which is to take a strategic approach to planning for housing and should therefore be avoided.

ix. Conclusion on the use of the Housing and Economic Needs Assessment

1. GWEPC does not agree with the use of the HENA as a tool for assessing Cherwell's housing need. Our thoughts on this are in line with those of the expert officers in the other Oxfordshire Districts.
2. The use of the HENA means that Cherwell needs to build 5,340 more dwellings than would be required by the Standard Method.
3. But on top of those 5,340 additional dwellings, Cherwell also seems willing to take on Oxford City's similarly inflated HENA housing need. Cherwell's apparent willingness to take 33% of this claimed unmet need means an additional 207 (284 x 73%) dwellings per annum, or 4,140 over 20 years, need to be built than would be required by the Standard Method.
4. Like the other Oxfordshire Districts, GWEPC believes that Cherwell should be requiring Oxford City to re-examine the amount of housing than can be accommodated in Oxford itself.
5. Cherwell seems willing to take 33% of Oxford's claimed unmet need simply because that is the percentage of unmet need that it took previously. GWEPC does not agree with this unjustified allocation of Oxford's unmet need to Cherwell simply on the basis that this is what happened before.
6. Cherwell's use of the HENA results in plans to build nearly 9,500 more dwellings than it needs to. This puts more pressure on: the countryside; the Green Belt (which has ,as explained above, already been significantly eroded in Gosford and Water Eaton by the Local Plan Partial Review to 2031); the achievement of net zero carbon; the ability to adhere to the Strategic Vision (which Cherwell has signed up to); local services; and local infrastructure.
7. The more dwellings that Cherwell commits to building the more likely that it could fall behind on its 5 year housing land supply. This could lead to the possibility of successful speculative housing development applications outside of the local plan allocations, something that the local plan should be seeking to avoid.

END