



Oxfordshire Growth Board Monday, 26 September 2016

ADDENDA

5. Public Participation (Pages 1 - 10)

Members of the public may ask questions of the Chairman of the Growth Board, or address the Growth Board on any substantive item at a meeting subject to the restrictions set out in the public participation scheme.

Attached is a copy of the questions received at the meeting on 26 September 2016, together with the responses to those questions.

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Oxfordshire Growth Board **Agenda Item 5**
Monday 26 September 2016
Agenda Item 5: Public Participation

In accordance with the public participation scheme, requests to address the meeting and questions submitted have been listed in the order submitted. The time limit for public participation is 30 minutes.

Restrictions on requests to address the Board:

- Must be on a substantive agenda item
- May speak for up to 3 minutes.
- With the leave of the Chairman, any questions of clarification asked of the

speaker by Growth Board members should be duly answered.

- There will be no debate on any representations made except to the extent that they are considered when the relevant agenda item is considered later in the meeting.

Restrictions on questions submitted to the Board:

- Questions shall be directly relevant to some matter in which the Growth Board has powers and duties and which directly affects the area of Oxfordshire.
- Submitted questions shall be dealt with in the order of receipt by the host

authority.

- The questioner may read his/her question, but the Chairman will do so if the

questioner wishes for that, or is not present at the meeting. No supplementary question may be asked.

- The Chairman will answer submitted questions. This may take the form of an oral statement, or may be given subsequently in writing to the questioner. A written copy of the response will be circulated to all Growth Board Members. It is intended the written response will be given within ten working days of the meeting.
- No discussion shall take place on the question or the answer.

Public Participation Requests

Requests to Address the Board

Helena Marshall, CPRE

Chris Henderson, Vice-Chairman of Radley Parish Council

Questions to the Board

Tom Rice, Planner, Barton Willmore

“1. How has economic growth, place-making and socio-economics informed the apportionment ?

Response:

The apportionment is based upon an assessment of 36 spatial options or areas of search developed by the partners for the purposes of demonstrating the capacity of a district to accommodate a given proportion of Oxford's unmet need. Because the issue at hand is the solving of Oxford's unmet housing need the criteria all relate in some way to a measurement of the relationship between the areas of search and Oxford, for example accessibility to known employment areas, cultural or educational facilities. The full set of criteria and how the areas of search scored against them are detailed in the full report published on the Growth board web site.

When sites to accommodate the unmet need are brought forward by the planning authorities through their local plans they will be subject to the full rigour of sustainability appraisal.

2. When will the findings be subject to public consultation?

Response:

The apportionment is recommended to local planning authorities for them to consider. Firstly whether they believe that the apportionment is appropriate and secondly how they will move forward to address this housing need. Both of these decisions will be taken through the local plans and it is through the public engagement and examination of these plans that the apportionment will be subject to public examination and scrutiny

3. At paragraph 144, the report identifies that it will be for each council to consider whether they adopt any of the areas of search assessed through the work programme, or whether they develop an alternative approach. If the capacity of each district has been assessed on the suitability of the areas of search, how will the inclusion / consideration of additional and alternative sites at a district level affect the overall apportionment?

Response:

The apportionment is a measure of a district's general capacity to accommodate a level of unmet need from Oxford. However the areas of search as paragraph 144 states are not meant to be a proposal of how that unmet need should be addressed spatially by local planning authorities. If they choose to take a different route then that is a matter for them to set out and justify in local plans. The apportionment is agreed amongst the 5 authorities and it is not the intention of the Programme to consider reapportionment.

4. **What will happen to the overall apportionment if, through further evidence gathering in their local plan, a district considers that it cannot meet the need apportioned to it in this report?**

Response:

The apportionment has been delivered under the auspices of the statutory duty to cooperate. This is a duty to cooperate, not to agree. However at present 5 of the 6 councils have agreed to take forward the apportionment through their local plan processes and it would be unhelpful to speculate on outcomes such as the one described when at present those councils intend to meet their commitments as set out in the apportionment.

Stephen Fry

1. **At any stage in this overall-planning approach** (including the proposals before us today, and any being run concurrently), as well as the approach seeking conclusions on **numbers** of homes needed, **has there been**

(i) **any policy analysis** - of any type - **to which the same weight** is being/given by yourselves and any analogous groups as the weight given to the numbers, on

(a) the **aesthetic** effect or consequences of the type or design of **architecture** proposed for these houses?

(b) any proposed best **configuration** - for example only: high-rise, low-rise, no-cars, eco-led, number-of-beds, co-operative, publicly-funded, etc.?

(c) the inclusion of debate/decision on **volume of facilities** (shops schools doctors etc., etc..) and if so in what configuration?

(d) whether and what proportion of the **new building** should **necessarily** be of the '**council**' (**publicly-funded**) type?

[d1] (I would note that a dominant portion of public opinion that I consult agrees that this has been ignored for 30 years, and is, fortunately or not, essential to restore the housing balance, since otherwise ALL the (14,000?) homes planned will have the price point and occupancy only of second homes for the well-off from the capital) ;

(e) the **calculation of affordability** provided by Peter Jay (proving the point in [d1] - which is as follows?

-----**Start of Affordability quote**-----

In Oxfordshire a sensible starting point, therefore, should be incomes, which are the main factor determining how much people can afford to pay for housing. Average full-time weekly earnings in Oxfordshire in April 2015 were, by local council area:-

Table 1

Oxford City	£580
West Oxon	£525

Cherwell	£545
Vale	£618
South Oxon	£583

Source: <http://www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc126/>

Converted into pre-tax annual earnings at 52 ¼ weeks per year these incomes range from £ 27.5k to £32.3k per year.

A helpful government website - www.moneyadvice.service.org.uk - shows how this starting point can be used to calculate the mortgage borrowing and so the house prices such earners can afford. This calculator requires one to make assumptions about current outgoings.

Illustrative results are summarised in Table 2:-

Table 2

<i>Item</i>	<i>Earners A (£27.5 k p.a.)</i>	<i>Earners B (£32.3 k p.a.)</i>	<i>Earners C (2 x (£30 k p.a.)</i>
<i>Units</i>	<i>£s per month</i>	<i>£s per month</i>	<i>£s per month</i>
Monthly take-home pay	1822.27	2087.60[i]	2 x 1964 = 3928[ii]
Credit card loan payments	50	50	75
Child/spouse maintenance	0	0	0
Child care/school fees	150	150	1045
Travel	175	200	300
Bills/Insurance	175	200	250
Currents rent/mortgage	600	650	750
Leisure	125	150	200
Holidays	125	150	200
Food, groceries, toiletries	250	300	350
TOTAL ASSUMED MONTHLY OUTGOING (as above)	1650	1850	3170
Mortgage Offer Range (as per 'money advice service')	£75,320- 112,980	£88,760- 133,140	£165-248,000
Repayment period and interest (as per 'money advice service')	25 years, 5%	25 years, 5%	25 years, 5%
Implied house price (if centre-of-range mortgage = 80% of price)	£118k	£139k	£260k

If something much less than £150,000 is the kind of house price that an average earner in Oxfordshire can afford (even given that s/he has the 20% deposit assumed in these calculations), then the houses which developers currently want to build – and pray in aid the national shortage of houses for those in need – are at upwards of £250,000 a unit well beyond the reach of those on average earnings and below. Most of those would still be beyond the reach of even the two full-time earners household.

In plain English they are unaffordable. They do not become affordable by simply knocking 20 percent off market prices and calling it “affordable housing” .

[i] <http://www.thesalarycalculator.co.uk/salary.php>

[ii] Ditto

-----end of Affordability quote-----

(f) seeking a **single overall, properly protective policy-within-the policy** specifically for the proportion of otherwise currently

(i) **green** land and

(ii) **green** belt land that could or should be eliminated? I

refer in this question to both binding and well-considered

(a) overall principles and also

(b) location-specific decisions?

(g) the **following analysis:**

Start of Green Belt quote

i) The main value of Green Belt policy is not related to the environmental quality of the land: it is designed to stop urban sprawl.

ii) Commentators fail to understand the importance of land protected as Green Belt. For example, the analysis of the value of Green Belts by the Adam Smith Institute largely relies on a single study carried out in Chester in 1992, suggesting that Green Belt land provided environmental benefits to society worth £889 per hectare per year. This is a massive underestimate for the true value of the Green Belt overall.

iii) Green Belts provide countryside close to 30 million people and give a range of benefits, including 30,000 km of public rights of way, 250,000 hectares of best quality agricultural land, 89,000 ha of Sites of Special Scientific Interest (SSSIs) and 220,000 ha of broadleaf and mixed woodland.

iv) Many of these benefits have increased over time and the protection against development afforded by the Green Belt designation will have played a critical role in this. To give one particularly outstanding example, Windsor Great Park (which lies in the Metropolitan Green Belt) has been valued by the Government’s Natural Capital Committee as having environmental benefits worth at least £49 million, or £7,600 per hectare per year.

-----end of Green Belt quote-----

2a. Will you as an organizing group confirm that the above considerations are an essential part of the debate and thus must be resolved before any housing 'planning' decisions can properly be taken?

b) if not, which parts do you accept as having that description?"

Response:

The Board accepts that all the above criteria are important components of a rounded decision on future development. However all of these reflections are predicated upon there being a spatial development proposal to consider. The apportionment is a high level of a district's capacity to accommodate additional housing need to assist Oxford and is not underpinned by any site development proposals. These will be brought forward by Local Planning Authorities at which point they will be subject to the full range of sustainability and other testing and the conclusions consulted upon and tested in public examination.

Dr Pam Roberts, The Save Gavray Meadows Campaign

"6 work 'streams' to inform the apportionment of houses for Oxford's Unmet Needs include a 'High-Level Habitats Regulation Assessment'. Can the Oxfordshire Growth Board explain whether this high-level HRA refers to Oxfordshire SACs or all Oxfordshire-wide habitats? In addition, will an Environmental Impact Assessment be carried out of the cumulative effect of the inclusion of these sites, proposed to take the 14,850 houses for Oxford Unmet Needs, on top of the 100,000 houses already proposed in the SHMA?"

Response:

Thank you for your email. I provide a response having consulted with planning officers dealing with this area of work.

The HRA work being commissioned by the Oxfordshire Growth Board is a non-statutory piece of work to consider the potential cumulative effect on European Union protected areas of nature conservation which in Oxfordshire include Special Areas of Conservation (SACs).

Each Local Planning Authority has a statutory duty to consider, through a screening process, whether a Habitats Regulations Assessment is required in preparing their respective Local Plans. The commissioning of a higher level piece of work through the Growth Board was considered to be necessary to help inform the statutory Local Plan processes undertaken by each Local Planning Authority in determining how and where to make their contributions in meeting Oxford's unmet housing needs.

The aim of the assessment is to identify all European designated sites which may be impacted by the subsequent location of new housing within the Oxfordshire County boundary to help inform the decision process of where housing may be delivered in accordance with the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations). It is intended to identify reasons for conservation designation, site vulnerabilities, the status of site features, and potential impacts. It is also intended to consider the zones of influence for each European designated site.

Separately, it is for individual Local Plans to meet the statutory requirements for HRA and Strategic Environmental Assessment (SEA) / Sustainability Appraisal in preparing their local plans. SEAs must consider any cumulative & synergistic effects where relevant. It is through the SEA/SA process that other national and local designations are considered in assessing the effects of proposed growth.

Environmental Impact Assessment (EIA) is a requirement relating to the preparation of specific development proposals and results in an Environmental Statements being submitted with qualifying applications for planning permission. EIAs will not therefore be undertaken until developers prepare their detailed proposals.

Helen Marshall, CPRE

“The public was told that the Oxfordshire Strategic Housing Market Assessment (SHMA) was an evidence document that would be examined as part of the Local Plan process. However, at least one of our District Councils is now being strong-armed into accepting the housing numbers outlined in the SHMA because a Planning Inspector has argued that there was no objection raised within the Growth Board process. So, whatever the protestations about this being taken forward in Local Plans, it seems clear that signing off the paper on housing allocations for Oxford’s unmet need will commit our local authorities to its findings. Can the respective members of the Growth Board (the five District Council leaders) confirm that by endorsing this deeply flawed process, they will then be speaking in favour of inclusion of these sites as part of their Local Plan – Yes or No?”

Response:

No. No district agreeing to the apportionment has agreed that any of the areas of search examined should then become the basis for development sites. This has been made clear in the report

Fiona Newton,

“Can the Board feel confident in making a decision today to approve the agreed working figure for the unmet housing need for Oxford, when the documentation contains critically inaccurate information?”

To note the Spatial Options Assessment:- Site 24 is not in Botley, It is Cumnor Site 25 is not Chawley, it is Cumnor Site 24 is already earmarked for a Park & Ride by OCC

Will the Board publish the full evidence base so that the public can check that information contained within the evidence base is accurate?”

Response:

As has been made clear in the report the apportionment is not based upon sites but broad areas of search, these are detailed in the report. Officers are

confident that the labels attached to these areas of search accurately reflect their geographical position.

The full Programme, including all the constituent reports have been published in the growth board pages of the lead authorities website, Oxfordshire County Council.

Phil Clark, Chief Planner, Galliard Homes Limited

“I write on behalf of GRAA Ltd who have an interest in the Oxford Grey Hound Stadium in Sandy Lane, Oxford.

Having now reviewed the public documents in which the Co-operative looks to disseminate Oxford City Council’s housing allocation to its neighbouring authorities. Clearly the report focuses clearly on this dissemination, however we have a couple questions regarding the inward consideration / allocation of housing within Oxford City Council’s Authoritarian boundary.

- 1. Has there been a full consideration of all sites promoted with their 2015 call-for-sites?**
- 2. Was there any consideration of our site, the Oxford Grey Hound Stadium, Sandy Lane?**
- 3. Is it appreciated that the Oxford Grey Hound Stadium is available and accessible, capable of delivery circa 200 residential units? We recognise that this is only a small chink in the 15,000 housing target, but brownfield development should be prioritised in accordance with the NPPF’s ‘presumption in favour of sustainable development’.**
- 4. Will the Board be making recommendations to OCC’s Local Plan housing allocations? Because such a recommendation would be very powerful.”**

Response:

The process and criterion for considering strategic spatial options (or ‘areas of search’) is set out in section 7.3 of the report to Growth Board ‘A Countywide Approach to Meeting the Unmet Housing Needs of Oxford’. The criteria includes a minimum threshold of 500 dwellings, which would exclude the Oxford Greyhound Stadium site.

It was not the objective of this study to revisit all of the sites from the Oxford housing land availability assessment (SHLAA, 2014) because those sites have already been taken into account in the assessment of capacity in Oxford (stage 7.1 in the report). The objective is to find additional capacity to accommodate the unmet housing needs that exceed what can be met within the Oxford boundary.

It is not for the Board to recommend specific sites, that is a matter for the individual local plans and the sovereignty of the local plans has been an established principle throughout the joint work. The appropriate process for the Greyhound Stadium to be considered is through the Oxford housing land availability assessment, the next update to which is due to be published in 2016, and through the Local Plan 2036.

Helena Whall, Need Not Greed

“It was our understanding that the revised SEP Refresh was to be considered by Local Authorities, OxLEP, and the Oxfordshire Growth and Skills Boards during September and early October, with the final SEP 2016 being launched in November (as per the OxLEP website). Need not Greed Oxon was therefore confused to see that the revised SEP Refresh was not on the original agenda of the Growth Board Meeting on Monday 26 September.

We have since learnt that the review of the SEP is to be taken as an urgent item on the agenda and that it was always the Board’s intention to review the SEP at this meeting, but it was left off the original agenda due to an administrative oversight.

Need not Greed Oxon had already submitted a question to the Board regarding the absence of this item on the agenda, hence we were given the opportunity to reframe our question in the light of this administrative oversight and the deadline for our submission was extended. However, as of 22 September, the SEP has not been added as an urgent item on the agenda. As such, we are deeply concerned that members of the public will not know that the SEP will be on the agenda and have therefore missed their opportunity to submit a question on this agenda item (members of the public are required to submit questions a week before the meeting). Surely this is not an appropriate or transparent method of public engagement?

Furthermore, we are alarmed that an issue as important as the revised SEP Refresh is to be considered as an ‘urgent item’ on the agenda. How can we have faith that it will be given the consideration it deserves. Surely the SEP needs to be considered thoroughly and not rushed through because of an administrative oversight?

Need not Greed Oxfordshire has long been concerned at the lack of robust, democratic oversight of OxLEP - an unelected quango. The apparent absence of any proper scrutiny of the revised SEP Refresh by the Growth Board confirms our worst fears. We want to see the revised SEP Refresh debated properly at the next Growth Board Meeting on 30 November.

Given that the first listed purpose of the Growth Board is ‘To facilitate and enable collaboration between local authorities on economic development, strategic planning and growth’ - will the Growth Board commit to considering the revised SEP Refresh at its next meeting?”

Response:

The Oxfordshire Strategic Economic Plan (Refresh) or SEP was published for Public Consultation by The Oxfordshire Local Enterprise Partnership (OxLEP) in summer 2016. This followed extensive workshop, stakeholder engagement including business representative groups and consultation over the early half of the year. This also included discussion at the July 2016 meeting of the Growth Board where all council leaders welcomed the LEP’s support for Local

Authority consultation and agreed that the SEP would be the subject of further scrutiny and examination in each Local Authority, these processes are on-going.

The Board received an additional presentation on the SEP at its September meeting and fed any comments additional to those already made to OxLEP. The SEP will now be finalised in the light of this and other responses in November 2016 following LA consideration. In the light of these processes the Board do not see any reason to once again review the SEP at its November meeting.