

Consultation on Planning Policy Statement 3

Name: Michael Crofton-Briggs (Business Manager – Planning)
Organisation: Oxford City Council
Address: Ramsay House, 10 St Ebbes St, Oxford, OX1 1PT
Email: mcrofton-briggs@oxford.gov.uk



1. Do the policies set out in Draft PPS3 deliver the Government's housing objectives (set out in paragraph 1)?

Yes

2. Are the arrangements for delivering PPS3 clearly set out in relation to:

a) Working in sub-regional housing markets

Paragraph 4: As sub-regional housing market areas do not have clear boundaries and will rarely match with Local Authority boundaries, it is inevitable that Local Authorities will need to work with neighbouring authorities to delivery a relevant and useful assessment. However, there may be occasions where one LAs might straddle two or more sub-regional housing market areas which could mean contributing to the cost of more than one assessment or result in one half of the LA being assessed but then a gap of, perhaps, years until the other half of the LA is assessed. Also, this joint-working relies an all LAs being able to work to similar timescales which, unless the RSS sets out clear timetables, could delay the delivery of some assessments. The importance of robust co-ordination of the production of the assessment is emphasised.

b) Determining the regional level of housing provision and it's distribution

Paragraph 7: General approach supported. It should be ensured that criteria (f) and (g) are given significant weight.

c) Allocating and releasing land for housing

There is concern that PPS3 does not refer to the sequential test in relation to land for housing. Although it refers to brownfield land being the priority for development, it does not prevent greenfield land being developed if it is required to meet targets. There is concern that the lack of a sequential test leaves more opportunity for developers to argue the case for developing unconstrained greenfield sites. The approach in PPS3 suggests that greenfield development in this circumstance might be acceptable if there are delays in bringing forward brownfield sites for whatever reason. This is very concerning considering that Oxford has identified enough housing land to meet the 100% of the structure plan target on brownfield land anyway.

d) Making the efficient use of land

Annex C: Although high densities will be achievable and appropriate on many sites in Oxford, consideration must be made to the size of houses that are needed in Oxford. Higher densities inevitably result in greater proportions of small dwellings, in terms of number of bedrooms as well as the floor area of properties. It is therefore strongly recommended that when deciding appropriate densities, consideration is taken of the mix of dwellings sizes required to meet local need. Support general approach although it is suggested that "the mix of dwelling sizes appropriate to the need of the Local Authority area" should be added as a criteria to (3) as this inevitably has an effect on housing densities.

e) Planning for mixed communities

Paragraph 28: Suggest clarification in relation to the words "must be of broadly equivalent value" in paragraph 28.

A greater contribution should be sought from financial contributions to reflect the benefit that developer gains through 100% facilitation of the site as private market accommodation (compared to 50%, in Oxford, when on-site affordable housing is provided) and to ensure equitable distribution of both market and affordable housing to meet the needs of the local community. In Oxford, for example, a site of 20 dwellings would provide 10 units of market housing and 10 units of affordable housing on-site. If, however, it were considered by the City Council and the developer that the provision should be off-site, if the site provided 20 market units, the City Council would require a financial contribution equivalent to cover both build costs and land acquisition of 20 units of affordable housing on another site.

f) Planning for rural housing

No comment

g) Designing for quality

No comment

h) Greening the residential environment

Paragraph 39: Suggesting that Local Authorities merely "*encourage applicants to apply principles of sustainable and environmentally-friendly design and construction to new developments*" will not achieve anywhere near what is actually achievable in new developments. If an application cannot be refused on the grounds of a lack of sustainable design measures then any 'encouragement' will be ineffective. Government guidance should be much more if forceful if construction practices and building designs are to change for the better.

During Oxford's Local Plan Inquiry, one of the arguments that developers used against our policies on resource conservation was that such materials/resources/expertise were not widespread enough to make their use viable. By ensuring developers use such practices on a national basis, there will be more demand, they will become more commonplace and prices will drop and therefore there will be more opportunities to conserve resources (and less reason for developers to avoid using them).

i) Managing delivery and development

No comment

3. Are the definitions set out in Annex A clear?

Paragraph 12: Support the distinction between intermediate housing and low-cost market housing.

4. ODPM is committed to producing policy that promotes equality of opportunity and good relations between people of different racial groups and eradicates unlawful discrimination. We are in the process of completing an equality impact assessment and would welcome views on whether the policies set out in draft PPS3 will impact differently on people from different ethnic groups, on people with disabilities and on men and women?

No comment