

## **Headington Action response to Housing Policies DPD (Preferred Options)**

We have three general comments to make:

1) The totality of developments in the Headington area

During the past few years there have been huge developments in the Universities and hospital sites, coupled with a significant increase in student accommodation and housing, with very little investment on travel, transport and community facilities. There are now plans to add much more – as the Sites document demonstrates - on top of strategic developments such as at Barton and the relentless pressure to infill. There still is no clear plan to meet this by an increase in infrastructure or quality of life elements such leisure facilities, green space or allotments (apart from that indicated in the Barton development).

As a consequence we consider that there should be no further significant development proposals in the Headington area until the City Council has prepared a proper strategic plan. This plan must set out what transport, housing, schools and other facilities are required to deal with the inevitable impacts of future development. The level of detail contained in the Core Strategy document is nowhere near enough.

2) Enforcement.

The resources dedicated to enforcement during the past few years have not been sufficient, as the Council itself has recognised from time to time. This means that good intentions are frequently not translated into reality, and there is distrust and cynicism amongst people about the planning process. We applaud many of the policies listed in the Housing DPD but remain concerned about the level to which these will be enforced.

3) Use of existing housing stock

We believe that more use of the Empty Homes initiative could be made and council house stock could be better managed. In other words, rather than taking the 'easy option' to build perhaps the existing housing stock could be better used.

### **Question 1: Design, Character and Context**

We have set out a **Preferred Option A** for a policy which would ensure all residential development enhances the character of the area. This covers mix of dwellings, density and scale of buildings, landscaping, surface drainage, gated streets, encouraging walking and cycling, and generally providing at least 10% public open space. It would also require developments of 10 or more homes to undergo a 'Building for Life'<sup>1</sup> assessment.

Do you agree with Preferred Option A?

**Yes, I agree with Preferred Option A**

**No, I do not agree with Preferred Option A**

We are broadly supportive of option A and have the following comments:

The fourth bullet point should be revised to read “proposals must demonstrate that there will be no significant increase in surface water runoff ...”

In addition to the reference to the **Building for Life** framework we strongly recommend that a rider is added to refer to **Manual for Streets** (Parts 1 and 2). This is particularly appropriate to bullet point six which refers to streets as places for human activity.

The final bullet point states that a minimum of 10% of the total site will be public open space. This needs clarification to ensure that roads, footpaths, alleys and similar hard spaces do not count towards the 10%. Preferably the reference should also be to “green open space”.

## Question 2: Residential Garden Land

Parts of larger gardens are often developed as infill housing. As private gardens are no longer classed as ‘previously developed land’, the Council is proposing a new policy to manage this kind of development. Both options treat garden land as different to ‘greenfield’.

✓  **Preferred Option A:** Require garden development to comply with specific policy criteria to include character, scale, layout, privacy and daylight, biodiversity and surface drainage.

**Option B:** State that planning permission will be granted for residential development on private garden land subject to other relevant policies, without setting out bespoke criteria.

We strongly agree that there should be criteria for residential garden land developments and support Option A.

## Question 3: Accessible and adaptable dwellings

The City Council wishes to see new homes built that provide accessible living space to all, including disabled people and anyone with mobility issues.

?  **Preferred Option A:** Require all new dwellings to meet Lifetime Homes<sub>2</sub> standard. On sites of 4 or more homes, require at least 5% of market dwellings as wheelchair accessible, or to be easily adaptable for wheelchair users.

?  **Option B:** Require all new dwellings to meet Lifetime Homes standard, but not to be wheelchair accessible.

No  **Option C:** The Council to seek at least 15% of new market houses to be easily adapted to meet the needs of people with disabilities.

We reject Option C but find it difficult to choose between Options A and B, although on the face of it Option A seems to be preferable. Our concern about a policy for wheelchair accessibility is a practical one - how could it be ensured that such homes are allocated to those in need, over a period of time? And how will a policy which requires 5% of 4 houses to be wheelchair accessible work (given that 5% of 4 = 0.2)? If Option A is practical in these respects then we would support it.

We agree about the need to provide for an increasingly elderly population. We assume that the Lifetime Homes standard is satisfactory in this regard.

## Question 4: Energy efficiency and natural resources

The Council is committed to sustainable, low-carbon housing. Further policy detail is now needed to take this forward.

**Preferred Option A:** Require that sites of 10 or more homes, or 20 or more student rooms (or 500m<sup>2</sup> of student accommodation) produce 20% of their energy from on-site renewable or low carbon technologies.

**Option B:** From 2013, require sites of 10 or more homes to meet the 'Code for Sustainable Homes' (Level 4). From 2016, require all homes to meet 'Zero Carbon' standard. Apply an equivalent standard to student accommodation of 20 rooms/500m<sup>2</sup> or more. Require these sites to produce 20% of their energy from renewable or low carbon technologies.

**Option C:** Use the City Council's Natural Resources Impact Analysis checklist to assess new sites of 10 or more homes, or 20 or more student rooms.

We agree the Council must be committed to sustainable low-carbon housing, but we do not have the necessary knowledge to judge between these options. In any case we assume energy efficiency standards will be driven by (and over-riden by) national government requirements.

## Question 5: Car and cycle parking

In Oxford, there is a need to make efficient use of land, and also to encourage sustainable travel choices. Car and cycle parking standards need to reflect this.

### **a. Car parking:**

**Preferred Option A:** Adopt maximum parking standards for houses and flats that reflect both size of dwelling, and whether or not parking is private (allocated), or shared on-street.

**Option B:** Continue to use current adopted standards.

We note in Option A that "car-free housing and car clubs would (sic) be encouraged". In general we support an increasing number of car-free developments and the use of car clubs. We recommend that a policy is developed to provide for these.

We find it difficult to comment on the amount of car parking provision, but our inclination is that these are still over generous – even though they are presumably less than now.

### **b. Cycle parking:**

**Preferred Option A:** Increase the minimum standard for cycle space provision for houses and student accommodation. Introduce a minimum standard for HMOs.

**Option B:** Continue to use current adopted standards.

## Question 6: Affordable Housing

Oxford has a huge need for affordable housing. There is a need to provide a clear policy to increase the amount of affordable housing. We also propose to ask new student accommodation to contribute towards affordable housing.

### **a. General housing:**

**Preferred Option A:** Require sites of 10 or more homes (or 0.25 hectares or more) to be at least 50% affordable housing (of which at least 80% social rented). Require a financial

contribution for sites of 4-9 homes.

**Option B:** Require sites of 4 or more homes to be at least 50% affordable housing (at least 80% social rented).

**Option C:** Do not require affordable housing from 9 or less homes. Require 50% affordable housing from all homes built additional to the first 9.

***b. Calculating a financial contribution:***

**Option (I):** Contribute 15% of total value of development.

**Option (II):** Contribute whole cost of providing off-site.

**Option (III):** Contribute an amount equivalent to land value uplift resulting from no on-site affordable housing.

***c. Student accommodation:***

**Preferred Option A:** Require a financial contribution towards affordable housing from student accommodation.

**Option B:** No contribution from student accommodation.

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## **Question 7: Protecting existing housing, dwelling space and private outdoor space**

The Council proposes to prevent a net loss of any self-contained dwelling, in order to prevent a reduction in the number of homes.

We are also proposing policies to ensure new homes provide good space standards, including for private outdoor space.

***a. Protecting existing housing***

**Preferred Option A:** Resist any net loss of a whole self-contained home. Protect at least 75m<sup>2</sup> of the building as residential where a partial change of use is proposed.

**Option B:** Maintain current policy which permits a change to certain uses, only where a 25m<sup>2</sup> home remains.

***b. Internal dwelling space***

**Preferred Option A:** Require new self-contained homes to be at least 39m<sup>2</sup> in size, and meet other basic standards.

**Option B:** Require all new self-contained homes to be at least 39m<sup>2</sup>, and all new family homes to be at least 75m<sup>2</sup>.

***c. Outdoor space***

**Preferred Option A:** Set out general minimum private outdoor space requirements, such as gardens for houses, and balconies for flats, taking into account the number of bedrooms.

**Option B:** Set out specific minimum outdoor space requirements for different types of home, e.g. houses of 2 or more bedrooms to provide at least 22m<sup>2</sup> private garden.

**Option C:** Maintain current requirement for family homes to generally provide a 10m long garden.

Our view is that specific minimum requirements should be set. But we consider that the Option B stated minimum of 22 square meters is too low. The current policy of a minimum garden length of 10m will in most cases dictate a garden area of larger than 22 sq m. The current standard must not be diluted.

### **Question 8: Living conditions (Privacy and Daylight)**

Privacy and overlooking issues are common when considering proposals for new housing. The Council is proposing a revised policy framework to help judge these issues.

✓  **Preferred Option A:** Assess all new residential development for its impact on residential amenity, including overlooking, sunlight, orientation, degree of overbearing and nuisance. Use the 45° code to assess sunlight and daylight.

**Option B:** Adopt detailed technical design standards, using specific rules based on measurable distances and angles, to assess new buildings and extensions.

Although we have expressed a preference for Option A we find it difficult to judge, as it depends on the actual technical standards set.

### **Question 9: Student accommodation**

New student accommodation helps to relieve demand on general housing, but needs managing to ensure the right sites are used. The Council is proposing a new policy to help achieve this.

✓  **Preferred Option A:** Expect development to be located on existing campuses and sites; in the City or a District centre; adjacent to a main thoroughfare, or on an allocated site. Expect developments of 20 or more student rooms to include communal space.

**Option B:** Do not include a specific policy for student accommodation proposals.

### **Question 10: Houses in multiple occupation (HMOs)**

Oxford has a high proportion of HMOs compared to other cities and towns. The Council is proposing a policy to prevent HMOs becoming too dominant in residential streets.

✓  **Preferred Option A:** Resist any new proposal for an HMO where this would mean that more than 20% of properties in a 100 metre section of the street were HMOs.

**Option B:** Resist any new proposal for an HMO where this would mean that more than 25% of properties in the whole street were HMOs. Do not allow any new HMOs in the former East Oxford Registration Area.

**Option C:** As Preferred Option A, but additionally, in any area where more than 10% of homes are student houses, do not permit any new HMO.

We agree with preferred Option A except we think 20% is too high. We ask that no more than 15% of properties in a 100 metre section of the street should be HMOs.

### **Question 11: Key worker housing**

Many people in Oxford are classed as 'key workers'. The City Council is proposing a policy to support more key worker housing, whilst ensuring some is affordable housing.

**Preferred Option A:** Adopt a local definition of key worker to include some higher education workers. Support key worker housing, provided it is additional to the general affordable housing requirement.

**Option B:** Maintain current policy which allows key worker housing to be exempted from providing affordable housing.

We are not sure about our preferred option. We are uncomfortable with the expansion of the 'key worker' definition because we think priority should be given to people already in that category. However, the failure to provide enough key worker housing within the city results in much greater travelling distances, and is a significant barrier to the recruitment of able staff. On balance we suggest staying with Option B.

We are concerned if key worker (or social housing) can subsequently be sold on the open market as this would reduce housing stock for these categories of people. Is there a policy governing this? If so we have missed it.

### **Question 12: Residential moorings**

Residential boats are a form of housing seen by some as having a low environmental impact. The Council is proposing a policy to support this form of housing.

**Preferred Option A:** Support new residential moorings, subject to criteria on amenity, access and operation of the waterways.

**Option B:** Do not include a specific policy.