

**Housing Strategy & Development Team  
Housing Service**

Planning Application Comments

**Planning Application Number:** 23/01633/F

**Site Name:** Calthorpe Street and Marlborough Road, Banbury

**Planning Officer:** Chris Wentworth

**Date of Comments:** 31/08/2023

**Comments by:** Paul France

**Support or objection:** **Objection**

<b>Proposal</b>	Demolition of existing retail units and public car park and redevelopment for residential dwellings (C3 Use). 230 dwellings of which 69 to be affordable.
<b>Pre-application comments</b>	<p>In our pre-application comments we advised that we would be unable to support the proposal fully until the proposed sizes of dwellings were amended. In particular, the 1 bed 1 person flats were of an unacceptable size and the 2 bed 3 person flats were also unacceptable.</p> <p>The proposal at pre application stage included the following 80 affordable units:</p> <ul style="list-style-type: none"> <li>• 52no.1-bed 1-person flats</li> <li>• 6no. 1-bed 2-person flats</li> <li>• 8no. 2-bed 3-person flats</li> <li>• 10no. 2-bed 4-person flats</li> <li>• 4no. town houses</li> </ul> <p>We requested that all rented dwellings must meet Nationally Described Space Standards and the GIA dimensions clearly shown on any plans submitted with future planning applications.</p> <p>We also advised that affordable housing should not be clustered in more than 10 units of one tenure and 15 units of multiple affordable tenures.</p>
<b>Policy requirements – numbers and tenure split</b>	<p>CDC Local Plan Policy BSC 3: Affordable Housing requires <u>at least</u> 30% to be affordable housing, with a tenure split of 70% rented and 30% intermediate, also referred to as Low-Cost Home Ownership (LCHO).</p> <p>National policy requires 25% of the <u>affordable</u> element to be First Homes. The NPPF sets out a requirement for 10% of the <u>total number</u> to be Low-Cost Home Ownership.</p>

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	<p>A policy compliant tenure mix on this scheme for the revised 230 units would therefore be:</p> <p>69 Affordable units, of which:</p> <ul style="list-style-type: none"> <li>• 18 First Homes (minimum 25% of 69 units)</li> <li>• 5 Shared ownership (min 10% low cost home ownership of overall number of 230)</li> <li>• 46 Affordable/social Rent (remaining affordable units)</li> </ul> <p>The proposal is for 69 Affordable units and the proposed tenure split appears to be 48 rented units and 21 intermediate (with 17 first homes). This is compliant with the overall number as above, however the split of rented and low cost home ownership would need to be amended in line with the above policy requirements,.</p> <p>The current proposal is:</p> <ul style="list-style-type: none"> <li>• 10no 1-bed 1-person flats</li> <li>• 39 1-bed, 2-person flats</li> <li>• 4no. 2-bed, 3-person flats</li> <li>• 8no. 2-bed, 4-person flats</li> <li>• 4no. 3-bed, 5-person flats</li> <li>• 4no. 4 bed town houses</li> </ul> <p>The proposals appear to suggest that all smaller units (1-bed, 1-person and 2-bed 3-person) would be rented whilst the 3-bedroom and 4-bedroom units would be intermediate.</p> <p>We would not support this split as larger family homes are required as rented units for those on the housing register. The larger family units, particularly when they are limited in number, need to be made available as rented.</p>
<p><b>Affordable needs and priorities identified from the HENA</b></p>	<p>The Housing and Economic Needs Assessment for Cherwell District and Oxford City Councils was completed in December 2022.</p> <p>The report shows that the estimated net annual need for rented accommodation in Cherwell is 660 and for affordable home ownership it is 193.</p> <p>These figures are well below the numbers delivered in recent years and highlight the need for an increase in the supply of affordable housing.</p> <p>We therefore welcome the 30% affordable housing proposed to be delivered on this scheme as required by</p>

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	policy.
<p><b>Affordable needs and priorities identified from CDC housing register</b> (as at July 2023)</p>	<p>We have seen a good supply of 1-bed units over the last 18 months which is now largely meeting demand for those who require 1-bedroom properties on our housing register and who have significant or urgent housing needs, so our needs are now lower for properties of this size.</p> <p>2-bedroom flats are equally not in high demand as they are usually allocated to households with children who require private outdoor space.</p> <p>The most pressing needs currently are for 3 and 4-bed properties (and a small number of 5 or 6-beds where feasible). In the last few years, the need for 4-beds has increased, with waiting times of around 3-4 years for those with significant housing needs to secure a 4-bedroom rented home through our housing register.</p> <p>We therefore welcome the inclusion of 4no. 4-bedroom houses however these would need to be delivered as rented housing rather than low-cost home ownership.</p> <p>To summarise, there is still an over provision of 1-bedroom flats proposed. In particular, 1-bed, 1 person flats.</p> <p>More family homes are required and the current 2 and 3 bedroom units contain no private outdoor space which is not acceptable, particularly for the 3 bedroom homes.</p> <p>In terms of affordability, social rent is the most affordable rented tenure for households on CDC's register. If affordable rent is delivered, we expect this to be capped at LHA rates and for this to be secured in the S106 agreement.</p>
<p><b>Affordable mix required to meet identified needs</b></p>	<p>We would typically require the following mix from a scheme including 69 units:</p> <p>1-bedroom 20-25%: 14-17 units  2-bedroom 25-30%: 17-21 units  3-bedroom 35-40%: 24-28 units  4+-bed 10-15%: 7-10 units</p> <p>We understand that on a town centre scheme primarily including flatted development the above may not be achieved, however the current proposals have not deviated far enough from the pre-application proposals to be acceptable.</p>

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	<p>There still remains an oversupply of 1-bedroom units at the expense of larger units and the 2-bedroom and 3-bedroom units are unsuitable for families as they contain little/no private outdoor space.</p>
<p><b>Accessible &amp; adapted provision</b></p>	<p>The Developer Contributions SPD sets out CDC's expectation that 50% of the affordable rented housing required will be built to Building Regulations Requirements M4(2) Category 2: accessible and adaptable dwellings.</p> <p>We expect that any ground level dwellings are included in the 50% and that Level Access Showers and level access thresholds are installed from the outset.</p> <p>It is unclear what percentage of the affordable units will meet M4(2) and plans appear to show baths provided on ground floor homes rather than any level access showers.</p> <p>In addition, 1% of the affordable housing should be built to Building Regulation Requirement M4(3) Category 3: Wheelchair User Dwellings. Where 1% equates to less than one dwelling, we would request that at least one wheelchair adapted dwelling is provided as there is a pressing need for this provision in a range of property types and sizes.</p> <p>This requirement is expected to be assessed on a site-by-site basis in discussion with the developer, and we would welcome discussions with the applicant regarding the provision of wheelchair adapted properties ie Category 3 2(b).</p> <p>It is unclear how many units are proposed to be M4(3)(2b) and if the type, size and floor plans of these units are acceptable.</p>
<p><b>Size standards</b></p>	<p>The Developer Contributions SPD sets out CDC's expectation that all affordable housing provided under a rented tenure will be built to the Nationally Described Space Standards. We request that any plans or Affordable Housing Schemes clearly state the dimensions and the person occupancy as well as number of bedrooms. We need to ensure that the rented dwellings comply with NDSS dimensions for the exact size (1-bed 2-person etc).</p> <p>Intermediate housing should be built to the same or better space standards including garden sizes as the equivalent market housing on the site.</p> <p>The size of the 4 bedroom town houses is unclear. They</p>

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	<p>appear to be designed as 7 or 8 person homes. They must meet NDSS and be at least 7 person units. The size and floor plans would need to be agreed in further detail.</p> <p>Furthermore it appears that some of the affordable units proposed may not meet NDSS including:</p> <ul style="list-style-type: none"> <li>• 1B1P flats shown as 38m<sup>2</sup></li> <li>• 1B2P Duplex's shown as 30m<sup>2</sup></li> <li>• 3B6P Duplex's shown as 50m<sup>2</sup></li> <li>• 2B4P Duplex's shown as 50m<sup>2</sup></li> </ul> <p>All affordable units must meet NDSS and plans must be altered to achieve this where this is not the case.</p>
<p><b>Layout, external appearance and tenure distribution</b></p>	<p>The Developer Contributions SPD sets out CDC's expectation that where appropriate, affordable housing should not be clustered in any more than 10 units of one tenure and 15 units of multiple affordable tenures with no contiguous boundary of the clusters.</p> <p>There can be flexibility in some circumstances, however we expect the above to be adhered to so that the tenures are distributed, and the scheme is "tenure blind". This is also achieved by the use of the same external materials, attention to the layout e.g. landscaping, parking arrangements and equal access to play areas.</p> <p>On this proposal it is noted that all affordable housing is clustered in blocks F and G. Whilst these are listed as separate blocks they appear to be clustered together as one block which all overlook the same small inner courtyard area.</p> <p>We understand some of the reasoning that clustering together can have benefits for maintenance by the RP, however, we require the applicant to obtain feedback from RPs specifically on this point to confirm their views and preferences.</p> <p>In any case, the current clustering of the affordable units is not acceptable. In particular 46 units in block F is too high a density of affordable units. Particularly when these are suggested to be 1 and 2 bedroom rented units. The addition of block G which appears to be attached to/in the same area as block F further makes the clustering unacceptable.</p> <p>Affordable units must be distributed more evenly across this site and the proposals must have regard to the requirements set out in our SPD setting out our expectation that affordable housing should not be clustered in any</p>

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	<p>more than 10 units of one tenure and 15 units of multiple affordable tenures with no contiguous boundary of the clusters.</p>
<b>Parking requirements</b>	<p>Sufficient allocated parking should be provided for each property type and this should reflect the provision made for market housing. Secure cycle storage should be provided in line with the requirements of registered providers.</p> <p>Parking for the affordable housing is unclear although it appears little/no dedicated parking has been provided for the affordable housing in blocks F and G which would not be acceptable.</p>
<b>Energy Efficiency/Climate Change</b>	<p>All affordable housing units will need to deliver high standards/rates of energy efficiency to ensure household fuel (and water) bills are also affordable for the tenants. This supports the delivery of sustainable development and contributes to the government objective to reach Net Zero carbon.</p> <p>Registered Providers (RPs) have been developing their specifications for energy efficient affordable housing units and the applicant is encouraged to have early discussions with them to ensure these specifications can be accommodated and are accounted for in any build tendering process.</p>
<b>Registered Provider &amp; delivery schedule</b>	<p>It would be useful for monitoring purposes if CDC can be notified of the selected RP at the earliest opportunity. A list of New Business contacts for partner RP's is available from the Strategic Housing team.</p> <p>Updates regarding the expected delivery schedule would also be useful.</p>
<b>Conclusion</b>	<p>Strategic Housing are unable to support this proposal because:</p> <ul style="list-style-type: none"> <li>• Parking for the affordable housing appears to be insufficient.</li> <li>• Clustering of the affordable housing in adjacent blocks F and G is not acceptable.</li> <li>• Size of the proposed units appear to not meet NDSS and 1-bedroom, 1-person flats do not meet needs.</li> <li>• Overall proposed mix of homes is not acceptable with an over provision of 1-bedroom homes and under-supply of larger homes suitable for families.</li> <li>• The split of affordable dwelling types and sizes between rented and intermediate is not acceptable.</li> <li>• The limited outdoor space for family homes (in</li> </ul>

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	particular 2 and 3 bed duplex flats) is not acceptable.
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