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CPRE Cherwell South District response to consultation on Kidlington Framework Masterplan Supplementary Planning Document, April 2016

CPRE has considered the Kidlington Masterplan and our response is given below.

We also wish to comment on the unhelpful, high profile press coverage that has accompanied the consultation. Cherwell and Oxford City Councils should take action to correct the widely reported suggestion that the Kidlington Masterplan is consulting over proposals to build 3,000 houses in the Kidlington gap. This misinformation undermines the consultation process. This bullying tactic should be deplored and robustly corrected. Oxford City has yet to demonstrate that it is unable to meet its currently undefined housing needs. It should consider the sites within its boundaries rather than continuing to allocate these for speculative employment growth.

Kidlington is already one of the largest villages in the UK. Since the 1960s it has expanded to meet Oxford's housing need. The Green Belt boundary constraint has prevented further uncontrolled growth. The report recognises this as a major strength and vital to the village character. Yet it also tacitly indicates that the Green Belt is no longer defensible. We challenge this assumption on principle and in practice.

Overall the Masterplan currently seems to prioritise development over life quality, encourage the loss of parking and recreational areas to 'rationalisation', and challenge the integrity of the Green Belt.

The report should be re-written as necessary to accept the presumption that Kidlington is embedded within the Green Belt and has very limited scope for new housing development. It could then more constructively focus on what that means for achieving what is a fine vision statement. This re-affirmation of intent to comply with Government policy to protect the Green Belt would send a strong, positive message to the public, planners, developers and landowners. This would we hope, discourage the speculative, deliberate erosion of the quality of the Green Belt and the environment it supports.

Question 2a Does the description of village character accurately reflect Kidlington?

Yes. Kidlington is embedded in a tightly drawn Green Belt that has successfully prevented it from merging with neighbouring villages and Oxford City. The negative impact of unconstrained ribbon and late 20th Century inward facing estates is recognised. The importance of the Historic Core area and the landscape surrounding it are correctly identified as vital assets defining the village's character. We note and agree that an opportunity exists to enhance the image of Kidlington as a village in a landscape setting.

Question 3a Does the description of green infrastructure accurately reflect Kidlington?

Yes. Table 3.7 gives a good summary of strengths and opportunities. It recognises the high quality and varied landscape character and habitats surrounding the village and that the Green Belt has prevented urban sprawl and coalescence.

Question 3b Are there any inaccuracies or important issues that have been missed?

The plan should include the existence of all areas of open landscape as an asset. It is important to protect areas of local ecological value in addition to those considered to be of special ecological value.

This section refers also to **Paragraph 9.3.1.5** which highlights the 'existing deficiencies and future shortfalls in provision in Kidlington' which the Local Plan Part 1 seeks to address. However, it also notes that '*These strategies were formulated before the amount and preferred distribution of development in the District for an extended plan period had been established, and as a result future needs will need to be updated to cover the period through to 2031*'.

It is not clear whether this has now happened and, if so, what the outcomes are. **This is surely a vital missing component of the Kidlington Masterplan.**

The Masterplan apparently fails to include proposals to maintain and enhance biodiversity as required within Cherwell and National planning frameworks. The omission should be corrected by including this either as a separate project or within the 'community needs' workstream.

Question 4a Does the description of community facilities accurately reflect the issues faced by Kidlington?

Lack of investment in good quality design leading to poor quality townscape and public realm is rightly recognised as a threat to Kidlington. It has suffered from poorly designed buildings and layout. Hopefully improved planning guidelines can prevent this in future development.

Oxford Road will almost certainly continue to act as a barrier as a result of its strategic highways function. Expansion at Langfield lane and the airport will increase commuter and logistic traffic through the village.

4b. Are there any inaccuracies or important issues that have been missed?

"Parking rationalisation" - Parking provision in the village should not be reduced in order to free land for development. Adequate parking is needed to underpin plans to revitalise the village centre and encourage passing/visiting and local trade

Question 5a Does the description of transport and movement accurately reflect the issues faced by Kidlington?

& 5b 5b. Are there any inaccuracies or important issues that have been missed?

Table 5.6 should include the proposals (5.5) to create new park and rides on Green Belt land as a threat.

The emphasis on the drive for economic growth along the knowledge spine (incl. Langford Lane, Begbroke Science Park and airport expansion) will result in north Kidlington taking a big increase in heavy commercial traffic. Overall, there will be a substantial increase in traffic through Kidlington from the various proposed developments.

Table 5.6 also identifies 'Improvements to Oxford Road to increase pedestrian and cycling priority' as an opportunity. Whilst we would welcome the transformation of Oxford Road from a traffic dominated highway to a pedestrian and cycle friendly street, this seems unlikely given the proposals for a massive housing development 'upstream' and the increased traffic from Langford Lane. More joined up thinking on infrastructure and traffic planning is therefore required.

The expansion of business parks and creation of new bus routes linking Begbroke will threaten an increase in traffic along the Yarnton-Cassington route. This is currently a major cycling commuter run which will be severely compromised in safety and user acceptability unless measures are taken to install a cycling lane along its length.

Proposals to improve the route into Oxford by using the canal towpath would need a significant investment. The towpath is unsuitable for regular commuting and is congested at weekends.

Section 8 Housing

8a Does the description of housing accurately reflect the issues faced by Kidlington?

& 8b Are there any inaccuracies or important issues that have been missed?

8.1 Housing Market Assessment

CPRE continues to refute the figures in the Oxfordshire SHMA as overblown and unsustainable. A recent research paper by planning expert Alan Wenban-Smith looked at the level of Local Housing Needs and concluded that only approximately 50% of the housing proposed in the County up to 2031 is to meet the need of existing local residents, with the other 50% based on a highly speculative economic growth strategy.¹

The Oxfordshire local planning authorities should re-think the overly aggressive Strategic Economic Plan being driven by the unelected and undemocratic Oxfordshire Local Enterprise Partnership, and commission an updated SHMA.

8.2 Housing Need

We note that ‘The average price of a 3 bedroom semi-detached house in Kidlington is currently in the region of £350,000 (February 2016)’.

However, research by Peter Jay on behalf of the Need not Greed Oxfordshire coalition suggests that for an Oxfordshire couple on average full time weekly earnings, the maximum price they could afford for a property would be £260,000.²

Whilst accepting that affordable housing policy is largely set by Government and beyond the scope of Cherwell District Council, we nonetheless challenge the myth that the vast amount of building proposed for both Kidlington and the District as a whole is going to make any significant impact on meeting the genuine affordable housing needs of local residents. New development has comparatively little impact on prices that are largely driven by existing housing stock, developers are not incentivised to build at a rate that will bring down prices, and recent and proposed changes in Government policy seem likely to have a negative impact on the delivery of even so-called ‘affordable’ housing, particularly in rural areas which are already underprovided for compared to urban areas.

We do acknowledge and welcome CDC’s support for community self-build and self-finish housing.

¹ See: <http://www.cpreoxon.org.uk/news/item/2533-local-needs-research-only-half-of-county-s-proposed-housing-to-meet-local-need>

² Contact info@neednotgreedoxon.org.uk for further info.

8.5 Housing Land Supply

We note that: ‘The 2014 SHLAA Update also identifies three sites outside the settlement boundary with a combined capacity of 377 units which could be considered with changes to adopted policy. However, it is acknowledged that exceptional circumstances would have to be demonstrated for the release of these sites from the Green Belt.’

CPRE does not believe that unmet housing need would provide the exceptional circumstances required to justify development on these sites and would strongly oppose any such proposals as undermining the openness and permanence of the Oxford Green Belt.

If no sustainable sites were to remain within Kidlington, then they should be found elsewhere. If CDC believes that there will be a future lack of suitable and sustainable sites in the vicinity, then it is folly to be identifying the area as a location for significant employment growth, calling into question the entire ‘knowledge spine’ concept.

Including mention of these sites within the Masterplan will merely serve to make them an immediate target for speculative developers in the event of CDC falling behind on its Five Year Housing Supply (a likely situation, given the ridiculously high housing targets adopted). CPRE suggests that reference to these sites is therefore removed entirely from the Masterplan.

Table 8.1 Housing Summary Analysis

‘Constraints on development outside settlement boundary’ is listed as a weakness, but should be seen as a strength and/or an opportunity- promoting Kidlington’s image as a village in a landscape setting (see Section 2).

Building on rural exception sites may theoretically increase the stock of affordable housing briefly. Once properties are available for re-sale they will rocket in value.

Para 9.3.1.5 - See response to Section 3 above.

Section 12 Kidlington’s Identity & Section 18 Action Plan

Threats to Oxford Green Belt

Sections 12.3 and 18.3 recommend performing a “landscape appraisal to establish a defensible boundary”. Kidlington sits within a tightly drawn Green Belt. The boundary is very clearly defined and defensible. The proposal amounts to endorsing a local review of the Green Belt. This was rejected by the Planning Inspector in the examination of the Cherwell Local Plan Part 1. Further, a study of the Oxford Green

Belt has already been performed and published. This report shows that all parts of the Oxford Green Belt are performing as intended.

Section 18 lists the Landscape Appraisal as being part of the Employment cluster /economic project to 'define development boundaries'. This suggests that a local Green Belt review would be performed to identify and release land for primarily employment purposes. The landscape appraisal is not listed within the Residential development strategy project. This is contradictory. The Local Plan already allows for a Green Belt review at Langford Lane and Begbroke employment area. It may be that this refers to appraising the potential conversion of Water Eaton P&R business park and hotel area? If so, it should not be Kidlington wide

13 Village centre development

13b Do you agree that the opportunity to reconfigure and potentially reduce some surface car parking in the village centre to release land for retail and housing development should be explored?

Parking provision in the village should not be reduced in order to free land for development. Adequate parking is needed to underpin plans to revitalise the village centre and encourage passing/visiting and local trade

13c Do you have any ideas to add?

The proposals for the village centre seem more of the same (mixed housing and retail) development that has failed to create a really attractive and vibrant centre. An attempt should be made to aspire to a clear vision, often encountered on the Continent, of a centre full of rich and diversified public spaces with plenty of trees and greenery where people are attracted to meet, shop and spend leisure time.

14 Community needs

14a Do you agree with the objectives and identified under the theme of 'supporting community needs'?

14.3.1 The area of search for expansion includes Green Belt with recognised wildlife (BAP) habitats. We would oppose this if the new facilities undermined the Green Belt status of the land and opened the way to building on KI 103.

14b Other suggestions

The plan does not go far enough in addressing the creation of community open spaces/ green spaces. It should recommend the active promotion of these and sustain access to the fields and walks already enjoyed, as well as considering the creation and protection of newly designated Local Green Spaces.

15. Economic Growth

15a. Do you agree with the objectives and opportunities identified under the theme of ‘supporting future economic success’?

No.

CPRE rejects the suggestion, outlined in 15.4 Longer term opportunities, that any consideration should be given to releasing further land around the Oxford Parkway area, which would undermine the openness and permanence of the Oxford Green Belt and exacerbate pressure at one of its narrowest points. The idea that this could be done ‘subject to the retention of a defensible Green Belt boundary’ is almost laughable given that this is exactly what the existing boundaries are there to provide. If something isn’t broken, don’t fix it.

16. Planning for Sustainable Growth

16a Do you agree with the objectives and opportunities identified under the theme of ‘planning for sustainable growth’?

See our response to Section 8 above.

CPRE agrees that:

1. Any future development needs to be of high design quality in keeping with a traditional Oxfordshire village character.
2. It is important to make best use of land within the village boundaries.

CPRE does not agree that it is in any way sustainable to consider release of Green belt whether as Rural Exception Sites or as land within the village boundary is exhausted.

Rural Exception Sites should not be allowed for whatever reason outside the existing curtilage of any village which is washed over by the Green Belt.

16b Further comments

It is not clear that the requirement for high design quality and provision of a high % of affordable housing within market-driven constraints will be achievable.

17a Do you agree with the objectives and opportunities identified under the theme of ‘integration and connectivity’?

Broadly, yes.

17b Do you agree with the ideas for public realm improvements on Oxford Road?

The Oxford Road is a major through route. Upstream proposals will increase traffic. This is not well thought through.

The plan recognises that the Oxford Road through Kidlington is busy, divisive and not people friendly. Any measures to mitigate that would be helpful but it is not yet clear what significant improvements could be made. In this context, proposals to improve cycle routes for commuting and leisure will be essential. We would hope

these can be brought forward as a priority since the main routes in and out of Oxford are recognised as being off-putting and potentially dangerous.

18 Action Plan and Next Steps

The plan states that the focus will be on working with existing businesses and landowners and the local community to make best use of existing assets and to maximise development opportunities and available funding.

All working groups should include local residents.

See also response to Section 8 above.

Yours faithfully



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Submitted on behalf of CPRE Cherwell South District