

January 2017

planningpolicyconsultation@cherwell-dc.gov.uk

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protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Dear Sir/Madam

RE: CPRE Oxfordshire response to Cherwell Local Plan Part 1 Review - Options Consultation, Jan 2017

Question 1 Cherwell's Contribution to Oxford's Housing Needs

Is 4,400 homes the appropriate housing requirement for Cherwell in seeking to meet Oxford's unmet housing need?

No. We fundamentally disagree with the figure of 4,400 houses because:

- a) It relies on the Oxfordshire Strategic Housing Market Assessment (SHMA) which is deeply flawed, significantly over-estimates housing numbers and is out of date.
- b) It is based on a strategy of rapidly increasing employment within Oxford City which is unnecessary and potentially highly damaging.
- c) It is not supported by an adequate spatial strategy that takes into account the environmental, social and economic capacity of the county as a whole.
- d) The level of housing proposed is not deliverable or sustainable.

The Oxfordshire SHMA

CPRE has, over the past three years, consistently opposed the underlying basis for District Council Local Plans in Oxfordshire and in particular the housing numbers contained in the Oxfordshire Strategic Housing Market Assessment (SHMA) (referred to in para 1.16 of the Options document) prepared by GL Hearn and Partners. We maintain our view that these numbers have been derived from unrealistic forecasts of economic growth in the non-statutory Oxfordshire Strategic Economic Plan which has not been subject to any serious public consultation. These views were outlined in our response to Local Plan Part 1, including the report by Alan Wenban-Smith¹.

¹ *Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs* - A critique of GL Hearn's April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) Urban & Regional Policy, May 2014 See <http://www.cpreoxon.org.uk/news/item/2369-local-authorities-must-reject-shma?highlight=WyJ3ZW5iYW4tc21pdGgiXQ==>

Since the SHMA was published, the decision to leave the EU has reduced the expected growth figures for the economy.

Delays evidenced with the developments such as the Bicester Office Business Park already suggest that growth is patchy.

As a result, the figures need to be revised significantly downwards. To continue to rely on them will incur local authorities in planning for an eventuality which may not happen. For example, under the growth projected by GL Hearn, Oxfordshire would require a new hospital if the quoted growth were to take place², at a time when health budgets are under enormous pressure.

Employment growth in Oxford

We consider that the local councils are individually planning for excessive employment generating development in the immediate vicinity of Oxford in an un-coordinated way, for example at Oxford's 'Northern Gateway' and the business park recently granted permission by Cherwell at Langford Lane in Kidlington. These proposals, if implemented, would have serious adverse impacts on the already over-capacity transport networks, on other infrastructure and services, on the environment and on the quality of life of Cherwell and Oxford residents.

Given virtually full employment levels in and around Oxford, there is no logical reason why land should continue to be allocated for employment creation in this area and therefore there is no justification for the resulting 'need' for housing.

We contend that much new employment can be located at sites elsewhere in Oxfordshire and, in many cases, elsewhere in England where there is a need for employment and where there is a plentiful allocation of land for employment and housing. We also think that with infrastructure improvements such as the Milton Keynes rail and road links, new employment can be located at some distance from Oxford while being physically well connected to it. Additionally, we consider that with the availability of high speed internet links across the country there is often no need for businesses to be located in physical proximity to each other. This is particularly the case for 'knowledge based' businesses.

We acknowledge that some new jobs particularly a proportion of those which directly arise from the activities of the Universities, may need to be located close to Oxford. However we see no need for the scale of employment growth envisaged in the SHMA. Nor indeed do we see evidence of need given that a large number of potential employment sites in and around Oxford remain undeveloped or incomplete (for example the Oxford Science Park³ and Oxford Business Park⁴). There is no need for development in the Green Belt either for employment sites or for the resulting new housing sites.

² Based on the assumption that the catchment population for a district general hospital is 180k. The national average is 2.7 hospital beds per 1,000 population, compared to 8.2 in Germany, 6.2 in France. Bed occupancy for Oxfordshire Hospitals is already higher than the average. See:

<https://www.england.nhs.uk/statistics/statistical-work-areas/bed-availability-and-occupancy/bed-data-overnight/> - NHS Organisations in England, Q2, 2016-17

If we assume that 100,000 new houses will lead to an increase in population of 250,000, this would require an extra 675 hospital beds. Where are these planned for?

³ "The Oxford Science Park offers a variety of design and build options for business from 25,000 sq ft upwards across seven plots." - see <http://www.oxfordsp.com/locate-to-the-park/>

⁴ Approximately 12 acres of land within the Oxford Business Park, which received planning permission in 1992, is still vacant.

Lack of a democratic and coherent spatial strategy

We note that the allocation of additional houses to Cherwell has been agreed by the Oxfordshire Growth Board without any formal consultation. The options report admits that this body “on behalf of the Oxfordshire Local Enterprise Partnership or ‘OxLEP’ is charged with the delivery of projects agreed in the ‘Oxford and Oxfordshire City Deal’ and ‘Local Growth Deals’” (para 1.20). The Growth Board appears therefore to be under an obligation to accept the unrealistic plans of an undemocratic body (OxLEP) and their consequences (namely the additional housing allocations), without public consultation, and now seeks to require (para 8.12) democratically elected local Councils to do the same.

In effect, strategic planning for Oxfordshire, which in the past has been subject to open and transparent public consultation, is now being imposed on local Councils without consultation by unelected bodies. Furthermore, this largely takes the form of simplistic numerical targets without a co-ordinated and coherent spatial strategy. We consider that this is a very worrying development which makes this current consultation little more than a sham.

CPRE believes that an Oxfordshire Structure Plan is now urgently required, that could take a more holistic view of employment and housing requirements across District and City boundaries, including looking at appropriate transport and infrastructure issues. This could be carried out by the Oxfordshire Growth Board and should be subject to Examination in Public by an Inspector. This should be completed before any decision is taken on the allocation of Oxford’s housing to Cherwell

The level of housing proposed is not deliverable or sustainable

Specifically in para 1.34 you ask for views on whether this level of development would be sustainable and deliverable through your Local Plan process.

We consider that the level of growth proposed is neither sustainable nor deliverable. Cherwell’s annual housing requirement was initially proposed at 670 houses per year in its Part 1 submission Local Plan (Jan 2014). This was significantly more than the average of 500 houses completed in the years preceding that. The Oxfordshire SHMA proposed increasing this to 1,140 houses per year, but consultants for Cherwell argued, as follows, that this was not deliverable:

“Evidence suggests that a target of 700-750 units is an ambitious yet realistic goal for Cherwell. The evidence does not though support a delivery rate of 1,140 new homes per annum (as modelled by the Oxfordshire SHMA). Indeed, this figure relies on an economic growth scenario: an approach which the authors acknowledge does not always reflect future outcomes. Market saturation would also be a key concern in seeking to deliver 1,140 units per annum, whilst in no previous years since 1996 has the District ever delivered this level of housing” (Montague Evans, *Cherwell District Council: Housing Deliverability*, May 2014)

The report went on to examine a higher target of 850 dwellings per annum though noting that this “would be a very strong challenge to set”. The arguments in the Montague Evans report were not accepted by the planning inspector and Cherwell was forced to adopt the SHMA figure.

Your latest residential completions data show that there was an annual average of 695 completions over the five year period 2011-2016. We note that this was boosted by exceptionally high levels in the two latest years. Housing completion numbers follow a cyclical pattern (there were for example 1,067 completions in 2005/06

despite a ten year average of around 500). It remains to be seen therefore whether the recent levels of completions continue into future years.

You point out in the options document that Cherwell's annual requirement has now reached an astonishing 1,700 houses per annum because of failure to achieve targets to date. This is still much higher than the unusually high levels in the latest two years. You now wish to add a further 462 (440 + 5%) per annum (from 2021) to figures which are already almost impossible to deliver. This appears to fly in the face of common sense. It is, of course, hugely important because of the impact it will have on Cherwell's ability to maintain a 'five year housing land supply'. Failure to do so seems highly likely and will put unidentified sites - often the most profitable green field sites in the countryside - at risk. If you are assessed as 'persistently under-delivering', these targets will of course be increased by a further 15%, with even more damaging consequences.

In addition to being undeliverable, we also consider that this number is not sustainable. In particular, we are unconvinced that the already over-capacity transport network will be able to cope with the additional demands upon it, even without the proposed employment-generating developments such as the Northern Gateway and Oxford Technology Park. The recently completed roundabout improvements in North Oxford have only partially addressed existing problems and we see little evidence that Cherwell and the Oxfordshire authorities as a whole have satisfactory plans for suitable transport infrastructure. Indeed we consider that the infrastructure required to support additional development might well be damaging in itself.

Question 2 Spatial Relationship to Oxford

Do you agree that we need to specifically meet Oxford's needs in planning for the additional housing development?

No. We do not consider that Oxford's needs have been correctly assessed. We also consider that Oxford City could do much more to meet its own needs for example by not proposing further large-scale employment-generating development, by reallocating employment sites for housing and by increasing density of development.

It should certainly not be the case that development outside of Oxford on greenfield sites should be more financially attractive than within the Oxford City limits on brownfield sites. Therefore, as a minimum, issues such as the proportion of affordable housing must be agreed between the Councils.

The Oxfordshire Strategic Housing Market Assessment 2014 requires 33% of housing in Cherwell to be of the affordable type and 50% in Oxford City - which of the two will apply for homes built in Cherwell for Oxford's surplus housing requirement? With affordability acknowledged as a very serious problem in Oxford, the 50 % figure would be appropriate. Bearing in mind the provision of affordable housing has recently been so poor what steps can be taken to encourage the building of affordable houses which is where the need arises most?

If targets stand and 50% of houses were to be of the affordable type this would represent 2,200 homes. In 2013-2014 Oxford City Council records show that not a single affordable house was built in the City. There is a huge disconnect here between the numbers of affordable homes the Council (and CPRE) wants to see built and the numbers actually constructed. Developers are not it seems prepared to build them because it is less financially rewarding.

Question 3 Cherwell Issues

Are there any new issues that we need to consider as we continue to assess development options?

Green Belt

Paragraph 81 of the National Planning Policy Framework requires Local Planning Authorities to plan positively to enhance the beneficial use of the Green Belt ‘to retain and enhance landscapes, visual amenity and biodiversity’. What steps will Cherwell DC be taking to fulfil this legal obligation?

Affordability

Both Cherwell District Council and Oxford City Council need to agree and provide guidance as to what proportion of the houses built will be affordable.

The Partial Review does not address the issue of affordability except in the vaguest terms (para 3.16):

“there needs to be a careful examination of the alternative housing models which would be appropriate such as rent to buy or community based housing, and whether measures to provide options for key workers, could be supported.”

Oxford has one of the most intractable problems with affordability in the Country. The statistics published are that the average yearly income in Oxford is £26,500 and the average price of a house is £426,000. The average yearly income is in line with the national average salary and is much lower than in London (£31,000). If one allowed for a deposit of £20,000 and a mortgage of four times earnings a single person on £26,500 per annum would potentially have a budget of £126,000. There is no prospect at all that any flat or house will be available to buy at such a low price (because this will be less than the cost of construction) and affordable housing if available would probably be the only option. However, even an affordable rent on 80% of market rate (£1,500 per month discounted to £1,200 per month) would still be unaffordable for anyone on a lesser income and therefore if Oxford’s housing need is to be met there will have to be a significant injection of Government funding.

The “unmet housing need” will have to be funded as it was in the past by something similar to Council housing building which until the 1980s made up about half the new homes constructed each year. In recent years spending by Government on social housing has diminished to the point where the number of units being built is minimal.

The Times on 31 December 2016 in an article headed “Housing Groups merge to build more homes”⁵ reported that:

“the number of affordable homes being built has dropped to its lowest level for 24 years according to the Government”

The same article also states that *“the Government funding to build social housing has been cut by 60%”*

It seems that any Government future funding will be in short supply.

⁵ <http://www.thetimes.co.uk/article/housing-groups-merge-to-build-more-homes-pprm03m2j>

Throughout the world in almost every major city there is a large unmet need for housing but need does not mean that the required housing is built - because generally those in need do not have the funds to finance its construction. Unless substantial state funding is provided for affordable housing there is no prospect of many of the extra 4,400 proposed homes being built in addition to those already required under the Cherwell District Plan. Building completions by private developers will stay much as they are.

There is no point in planning for large numbers of new houses if they are never going to be built. Government should explain how the required affordable housing houses are to be funded.

Density

CPRE believes that higher density housing helps reduce landtake and forces developers to build the more affordable housing that is actually needed. We believe the 30 dwellings per hectare standard currently in the Cherwell Local Plan should be raised. We also believe that if Oxford were to build at appropriate density levels, it could meet the majority, if not all, of its so-called 'unmet need' on sites within its own boundaries.

Question 4 Draft Vision for Meeting Oxford's Housing Needs

To provide new balanced communities that are well connected to Oxford, are of exemplar design and are supported by necessary infrastructure; that provide for a range of household types and incomes reflecting Oxford's diverse needs; that support the city's world-class economy and universities, that support its local employment base; and ensure that people have convenient, affordable and sustainable travel opportunities to the city's places of work, study and recreation and to its services and facilities.

Do you support the draft vision? Are changes required?

We do not agree with your draft vision because of our underlying disagreement with the premise on which this question is founded as outlined in our responses to Questions 1 and 6.

However, we also note that this draft vision surprisingly mentions nothing about preserving Oxford's unique natural setting, its heritage and preserving the environment which draws hundreds of thousands of people to visit each year. In this regard it is at odds with the Initial Sustainability Appraisal Report. The business generated from visitors is something that benefits the people of Oxford and its surroundings - jobs, business rates etc.

Question 5 Draft Strategic Objective SO16

To work with Oxford City Council and Oxfordshire County Council in delivering Cherwell's contribution to meeting Oxford's unmet housing needs by 2031

Do you support draft Strategic Objective SO16? Are changes required?

We disagree with draft strategic objective SO16 because of our underlying disagreement with the premise on which this question is founded as outlined in our responses to Questions 1 and 6. Instead we think that Cherwell should work with the other Oxfordshire authorities to divert growth away from Oxford and that that Oxford City Council should do much more to meet its own genuine needs, for example by not proposing further large-scale employment-generating development, by re-allocating employment sites for housing and by increasing density of development.

CPRE believes that an Oxfordshire Structure Plan is now urgently required, that could take a more holistic view of employment and housing requirements across District and City boundaries, including looking at appropriate transport and infrastructure issues. This could be carried out by the Oxfordshire Growth Board and should be subject to Examination in Public by an Inspector. This should be completed before any decision is taken on the allocation of Oxford's housing to Cherwell

Question 6 Draft Strategic Objective SO17

To provide Cherwell's contribution to meeting Oxford's unmet housing needs so that it supports the projected economic growth which underpins the agreed Oxfordshire Strategic Housing Market Assessment 2014 and the local economies of Oxford and Cherwell

Do you support draft Strategic Objective SO17?

No, we do not support draft Strategic Objective SO17. We fundamentally object to the basis for allocating 4,400 additional homes to Cherwell. Our objections have been set out in our representations to the Cherwell Part 1 EiP and supplemented by the report from Prof Alan Wenban-Smith.¹

We consider that there is entirely feasible that the employment growth will be substantially lower than projected. Indeed, we note that a large number of existing or potential employment sites in and around Oxford currently remain undeveloped or incomplete (for example the Oxford Science Park and Business Park - see our response to Q1).

The top ten employers in Oxfordshire as set out on the County Council's web site are as follows:

1. *Oxfordshire County Council*
2. *The University of Oxford*
3. *Oxford Radcliffe Hospitals*
4. *BMW (UK) Manufacturing*
5. *Thames Valley Police*
6. *Oxford Brookes University*
7. *NHS Oxfordshire*
8. *Oxfordshire & Buckinghamshire Mental Health Foundation Trust*
9. *Midcounties Coop*
10. *Waitrose*

Of the above, seven of the organisations are heavily dependent on Government funding which is already under severe pressure. What is the evidence that these organisations will be providing the sort of growth envisaged? How does the City Council intend to "accelerate economic growth" since words in this context mean nothing and every town and city in the UK seems to have the same idea?

Whatever levels of economic growth may or may not be *achievable*, this is still different to what is *desirable*, in the context of social and environmental impacts and ensuring that development is sustainable.

Given virtually full employment levels in and around Oxford, there is no logical reason why land should continue to be allocated for employment creation in this area and therefore there is no justification for the resulting 'need' for housing. We contend that much of the new hypothetical employment could be located elsewhere in the region and indeed in locations in England where there is a need for employment and where there is a plentiful allocation of land for employment and housing.

Question 7 Draft Strategic Objective SO18

To provide housing for Oxford so that it substantively provides affordable access to the housing market for new entrants, key workers and those requiring access to Oxford's key employment areas, and well-designed development that responds to both needs and the local context

Do you support draft Strategic Objective SO18?

It would be helpful to understand what mechanisms CDC believes it has at its disposal, under current planning law, to restrict the building of new homes to those that are key workers or those requiring access to Oxford's key employment areas. Without such mechanisms, it is clear that any new housing built will not meet this objective.

Question 8 Draft Strategic Objective SO19

To provide Cherwell's contribution to meeting Oxford's unmet housing needs in such a way that it complements the County Council's Local Transport Plan, including where applicable, its Oxford Transport Strategy and so that it facilitates demonstrable and deliverable improvements to the availability of sustainable transport for access to Oxford.

Do you support draft Strategic Objective SO19?

The Oxfordshire County Council's Local Transport Plan puts forward no proposals to sort out Oxford transport issues. It is the longest and most repetitious of documents which makes the point that none of the likely means to improve Oxford's transport problems are within the hands of the Council. Any changes to the A34 such as converting it to a six lane motorway have not even been included in any forward planning by the Department of Transport. The extension of the railway to Bletchley will in all likelihood begin work in 2019 and take five years to complete. There is no timetable for the re-opening the line to Cambridge as yet. The number of rail commuters to Oxford could well be less than might be expected due to transport problems of reaching the main employment areas in Cowley and Headington from either Oxford Parkway or Oxford station.

There is the vaguest of references to a Rapid transport network in Par. 3.23. If this is included to assuage doubts as to the ability of the local bus services to cope with the expected increase in population it is totally inadequate. In all properly planned developments, infrastructure comes first not last. The present bus service is already under severe pressure and there is a lack of space in St Giles to accommodate any more buses than run from North of the City.

Transport is a huge problem and is unlikely to a resolvable issue. How can Cherwell District Council sort out these problems in line with the proposed timeline for the increase in housing, when the means of any improvement are not even at the planning stage?

Question 9 Identifying Areas of Search

Do you have any comments on the Areas of Search we have defined?

Green Belt. CPRE objects strongly to development in the Oxford Green Belt which exists to protect the historic city from excessive development pressures and equally acts as a 'green lung' providing opportunities for recreation for the benefit of residents of the City and surrounding communities. Cherwell's adopted Local Plan

(2015) states that “The Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area.” We fully support this statement.

Green Belt is intended to be a permanent designation and exists for the benefit of the city of Oxford as much as the land that surrounds it. Unfortunately it appears that in seeking to encourage further development, and in particular employment generating development, the City Council does not share this objective. As noted above, **we believe that alternatives to development in the Green Belt exist and therefore that exceptional circumstances do not exist to justify development in the Green Belt.**

We consider it to be a telling and serious omission that you have not asked a question about the acceptability of development in the Green Belt.

Question 10 Site Size Threshold

Do you agree with our minimum site size threshold of two hectares for the purpose of site identification? Do you agree that we should not be seeking to allocate sites for less than 100 homes?

We note the references in 6.11 to housing density.

CPRE believes that higher density housing helps reduce landtake and forces developers to build the more affordable housing that is actually needed. We believe the 30 dwellings per hectare standard currently in the Cherwell Local Plan should be raised. It is worthwhile noting that Paris achieves 400 dwellings per hectare!⁶

Question 11 Identified Potential Strategic Development Sites

Do you have any comments on the sites we have identified? Please provide the site reference number when providing your views.

It is impossible to comment sensibly on each of the 137 sites selected, particularly given the limited information provided. Some of these may be appropriate for development, but many will have constraints that make them inappropriate for consideration.

As a consultation exercise this method of scatter gun selection is seriously flawed and unhelpful.

As a basic rule no development should be allowed on the Oxford Green Belt unless there are specific exceptional circumstances (see response to Q9).

Question 12 Site Promotions

Do any site promoters / developers / landowners wish to provide updated or supporting information about your sites?

Question 13 Other Potential Strategic Development Sites

Are there any potential sites that we have not identified?

⁶ ‘Driven by necessity’, Inside Housing magazine, 23 June 2006

Question 14 Representations and Submissions

Do you have any comments on the representations and submissions we have received so far. Do you disagree with any we have received? Please provide the representation number where applicable.

In the short time available for this consultation it is impossible to properly answer this question, particularly as many of those in opposition to these plans have yet to file their submissions. Our principle objection, which will be found in other party's representations and submissions, is the impact of developments on the Green Belt and thus the countryside around Oxford and on the City of Oxford itself which has been protected from adverse development for the last 70 years by the planning process and has as a result thrived. At the moment it is possible to walk from the High Street into the countryside, but for how much longer?

Question 15 Interim Transport Assessment Key Findings for Areas of Search

Do you have any comments on the Assessment and its findings?

There is very little information in the Assessment on the sorts of journeys that those living in the proposed homes will undertake. There appears to be an assumption that all those housed will work in central Oxford. This assumption is seriously flawed as most of the employment areas in Oxford are in areas such as the Hospital sites and the Cowley Business Parks and are a long way from the sites identified in the area of search. The fact that some of the sites are near a Number 2 bus route does not begin to address the question of how someone working on the South and East side of Oxford (where most employment is located) can get to work by public transport.

Question 16 Areas of Search - Selection of Options

Do you agree with all of the Areas of Search being considered reasonable?

Green Belt. CPRE objects strongly to development in the Oxford Green Belt which exists to protect the historic city from excessive development pressures and equally acts as a 'green lung' providing opportunities for recreation for the benefit of its residents. Cherwell's adopted Local Plan (2015) states that "The Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area." We fully support this statement.

Green Belt is intended to be a permanent designation and exists for the benefit of the city of Oxford as much as the land that surrounds it. Unfortunately it appears that in seeking to encourage further development, and in particular employment generating development the City Council does not share this objective. As noted above, **we think that alternatives to development in the Green Belt exist and therefore that exceptional circumstances do not exist to justify development in the Green Belt. Options A & B are therefore specifically not reasonable, although given the high growth levels already committed by Cherwell we do not consider any further land allocations necessary.**

We consider it to be a telling and serious omission that you have not asked a question about the acceptability of development in the Green Belt.

As it stands, Options A and B cover a vast area of land far in excess of the housing required and would co-join Oxford, Kidlington and Woodstock making a mockery of the Green Belt and adversely affecting the environment of thousands of local inhabitants. How can that possibly be reasonable?

Question 17 Initial Sustainability Appraisal-Key Findings for Areas of Search
Do you have any comments on the Initial Sustainability Appraisal and its findings for Areas of Search?

There is no reference to the issue of extra air pollution caused by the additional car journeys which will be generated from providing these extra homes. Oxford, because it is a major transport hub and being in a bowl surrounded by hills, already has a major problem with particulates and nitrogen oxide emissions. The pollution in the area close to the A34 should be closely monitored before any sort of housing development should be considered. Development further away from the harmful effects of air borne pollution around the A34 and the Oxford bypass would be beneficial, rather than adding to the problem.

Question 18 Strategic Development Sites Initial Selection of Options for Testing
Do you agree with the initial selection of site options for testing?

Green Belt. CPRE objects strongly to development in the Oxford Green Belt which exists to protect the historic city from excessive development pressures and equally acts as a 'green lung' providing opportunities for recreation for the benefit of its residents. Cherwell's adopted Local Plan (2015) states that "The Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area." We fully support this statement.

Green Belt is intended to be a permanent designation and exists for the benefit of the city of Oxford as much as the land that surrounds it. Unfortunately it appears that in seeking to encourage further development, and in particular employment generating development the City Council does not share this objective. As noted above, we think that alternatives to development in the Green Belt exist and therefore that exceptional circumstances do not exist to justify development in the Green Belt. We consider it to be a telling and serious omission that you have not asked a question about the acceptability of development in the Green Belt.

We note that the lack of any substantial selection process makes it impossible to review and comment meaningfully on all the potential sites, and meanwhile a large number of communities are being affected by planning blight. For example, at 50 houses per hectare, the 4,400 houses could occupy about 86 hectares of land, but Area of Search Option A alone covers 1,109 hectares! Whilst accepting that the Council has a duty to consider all sites submitted as part of the process, the fact that no basic screening has been undertaken rather leaves the impression of attempting to overwhelm the public with superfluous information.

Question 19 Initial Transport Assessment-Key Findings for Strategic Development Sites
Do you have any comments on the Assessment and its findings?

There is very little information in the Assessment on the sorts of journeys to work that those living in the proposed homes are expected to undertake. There appears to be an assumption that most of those housed will work in central Oxford. This assumption is seriously flawed as most of the employment areas in Oxford are in areas such as the Hospital sites and the Cowley Business Parks and are a long way from the sites identified in the area of search. The fact that some of the sites are near a Number 2 bus route does not begin to address the question of how someone

working on the South and East side of Oxford (where most employment is located) can get to work by public transport. The buses are already overcrowded and a simple journey of 2.5 miles can often take half an hour. There is no room for any more buses in St Giles and no means are suggested to alleviate the problem.

Question 20 Initial Sustainability Appraisal-Key Findings for Strategic Development Sites Do you have any comments on the SA's initial findings for sites?

No significant data is referenced to support the initial findings which would therefore appear to be merely guesswork at this stage.

Question 21 Evidence Base Do you have any comments on our evidence base? Are there are other pieces of evidence that we need to consider?

We consider that the Oxfordshire SHMA is based on a flawed analysis which has not been tested or validated (see our answers to Questions 1 and 6). Our objections have been set out in our representations to the Cherwell Part 1 EiP and supplemented by the report from Prof Alan Wenban-Smith¹ and his further note on local needs which takes account of DCLG 2012-based household projections⁷. You should address these criticisms together with those of other organisations by revising the housing need assessment downwards.

Question 22 Five Year Land Supply Start Date Is 2021 a justified and appropriate start date for being required to meet Oxford's housing needs and to deliver a five-year supply?

There is clearly a need for developers to be required to activate planning permissions and get on with developments. In a recent Dispatches program on Channel 4, it became apparent that this is a real problem with building land being hoarded. The Minister for Communities and Local Government Sajid Javid stated that he would bring forward urgent measures to oblige developers to start and complete projects. Until those measures are known we cannot comment on this question.

Question 23 Maintaining a Five Year Land Supply Do you agree that phasing of land release within individual strategic development sites will promote developer competition and assist the maintenance of a five year housing supply to meet Oxford's unmet housing needs? What alternatives would you suggest?

There appears to be little competition between builders due to the restricted output of new homes built. The Dispatches program reported that sites appear to be subject to a policy of keeping construction low and prices high and that new homes are effectively rationed to enhance builders' profits.

Question 24 Monitoring Delivery

⁷ *Oxfordshire Strategic Housing Market Assessment Note on 'Local Needs' 2011-2031*, Urban and Regional Policy, March 2016.

Are there any proposals you would like us to consider to ensure that the final plan is delivered and sustainable development is achieved.

CPRE believes that an Oxfordshire Structure Plan is now urgently required, that could take a more holistic view of employment and housing requirements across District and City boundaries, including looking at appropriate transport and infrastructure issues. This could be carried out by the Oxfordshire Growth Board and should be subject to Examination in Public by an Inspector. This should be completed before any decision is taken on the allocation of Oxford's housing to Cherwell.

Initial Sustainability Appraisal Report

Do you have any comments on the Initial Sustainability Appraisal Report accompanying the Local Plan Part 1 Partial Review consultation?

We agree wholeheartedly with Para 3.98 of the Initial SA Report Part 2, part of which is repeated here:

“Oxford is a world-renowned historic city, with over 1,500 listed buildings and 16 conservation areas, which cover 17.3% of the total area of the city. The built-up area extends to the administrative boundary around much of the eastern side of the city, and the river corridors of the Thames to the west and Cherwell to the east have created extensive green wedges running north south through the city. This gives Oxford a distinctive physical form.

“Although these assets have limited development within Oxford city, they are a large part of what makes the City a major tourist destination.”

In scoping for any development, in particular those covered by Options A and B, these issues must be paramount if the City centre and the large number of those working in services there are to thrive. If Oxford is to retain its attractiveness to visitors, road access cannot be allowed to be adversely affected by developments outside, with the look and feel of the City and its access to open countryside preserved.

Yours faithfully

Helen Marshall
Director, CPRE Oxfordshire