Cherwell District Local Plan Review Draft Submission Consultation

17 July to 29 August 2017

CPRE's initial concerns and recommendations

Overall comments:

1. **Oxford's "unmet need"**

   The Local Plan Review is intended only to accommodate Oxford's "unmet need" for housing but not only is Oxford's total housing need substantially overstated, Oxford has not satisfactorily identified the amount of it they might not be able to meet. In CPRE's view Oxford is capable of accommodating all or almost all of it by switching land earmarked for businesses to housing instead. It is therefore premature for Cherwell to even start the process of accommodating it.

2. **Green Belt**

   The Council's Local Plan Review is not just to build in the Green Belt, but to attack the core principles on which Green Belts depend. Even if Oxford's inability to accommodate its own housing need was real and had been properly quantified the Council could and should meet it elsewhere than in the Green Belt, which three quarters of its own voters want to see protected.

3. **Sustainability**

   Although the Council tries to argue that the most sustainable option is to build on the Green Belt, to lose Green Belt land is the very definition of unsustainability. The Council should locate development on the sustainable sites it has identified elsewhere in the district

4. **Density**

   In the adopted part of its Local Plan and in this Review the Council wastes land by proposing to build at very low densities (houses per hectare). This is not only an unsustainable waste of a vital resource, but higher densities would produce the more affordable houses people actually need. The Council should set much higher density targets.

5. **Transport**

   The Council says the housing could be supported by a new railway station 'between Kidlington and Begbroke' but this is extremely unlikely to be deliverable. Plans for additional housing in north Oxford/south Kidlington should be put on hold until the Oxford to Cambridge Expressway route is settled, the East West railway is re-opened and the full extent of the expansion of Bicester is agreed, with its possible new transport infrastructure.

6. **Employment**

Any new high-tech employment sites in the district should be focused at Bicester where large numbers of houses are already being built/have been provided for on the basis that high-tech employment would be provided, but this has not yet been forthcoming.

7. **Woodstock**

The planned housing for Woodstock will put undue stress on local infrastructure and services, threaten the World Heritage Site prospect, damage the rural environment and risk turning this historic town into an Oxford suburb. The Local Plan Review should instead protect historic Woodstock from inappropriate development.

1. Oxford's "unmet need"

The aim of this Review is to accommodate a proportion of Oxford's unmet housing need. But not only is Oxford's total assessed housing need grossly overstated, there is no evidence of the extent to which the City itself could meet it. The Inspector who signed off the adopted part of Cherwell's Local Plan said that no attempt to accommodate Oxford's unmet need should be made until it had been crystallised. It has not and therefore this whole Review is premature.

Oxford are only now beginning the process of determining how much housing need they could accommodate, and CPRE is confident that if they truly made it the Number One Priority the City claim it to be, they could accommodate all, or almost all, leaving little or no need to be met in Cherwell or any of the other surrounding districts.

What is more, if Oxford accommodated most, if not all of its need, it could provide more affordable and more accessible housing and drastically reduce commuting.

2. Green Belt

The Council is proposing to review the Green Belt boundaries north of Oxford/south of Kidlington and around Begbroke and Yarnton and build 3,990 houses on Green Belt land to meet the notional "unmet need" of Oxford.

By declaring the fact that the Green Belt surrounds the City is of itself a justification for building on it, the Council is seeking to undermine the Green Belt's very purpose, opening the whole Green Belt to development and the very urban sprawl it was created to prevent.

What is more, Cherwell's Local Plan Review is to attack the Green Belt at the point where it is already narrowest and most fragile, at the "Kidlington Gap"

If any housing development turns out to be needed when Oxford's unmet need (if any) is actually known, it can sustainably be accommodated elsewhere in the County. The proposed Green Belt sites should be removed from the Local Plan Review.

3. Sustainability

Although the Council tries to argue that the most sustainable option is to build on the Green Belt, to lose Green Belt land is the very definition of unsustainability. The

Council should locate development on the sustainable sites it has identified elsewhere in the district.

4. Density

The proposed density levels of 25-30 per hectare are too low and at the bottom end of previous Government guidelines and half those of desirable Victorian terrace housing. They fail to meet the actual housing need which is for smaller, more affordable units.

The Council needs to up its game and achieve much higher densities, using land more efficiently, and therefore needing to blight less of it, and providing smaller more affordable units on all proposed sites.

5. Transport

Roads

All of the proposed development sites in the Review amount to an outward expansion of Oxford, further over-heating problems in the city, in particular the congestion on roads which are already near or at capacity. In particular, increased housing in north Oxford/south Kidlington will exacerbate traffic congestion on the A4260.

Despite this, the Review is not proposing any major improvements to infrastructure.

Plans for additional housing in north Oxford/south Kidlington should be put on hold until the Oxford to Cambridge Expressway route is settled, the East West railway is re-opened and the full extent of expansion of Bicester is agreed, with its possible new transport infrastructure.

Rail

The Local Plan Review proposes a new railway station 'between Kidlington and Begbroke', the implication being that this station would cater for the needs of residents to reach their places of employment in Oxford and that therefore the housing plans are more sustainable.

However, there are as yet no feasible delivery plans. There are presently no proposals for a new station on the Oxford-Banbury line, nor are there likely to be because of lack of capacity. Neither Network Rail, Oxfordshire County Council, nor any train operator has any aspiration for a station here. It does not feature on any relevant route study or strategic proposal.

6. Employment

The Council is proposing further employment sites at Begbroke, in addition to those already provided in the adopted part of its Local Plan, despite there being no need for more employment in the Begbroke area.

Any new high-tech employment sites in the district should instead be focused at Bicester where large numbers of houses are already being built/have been provided for on the basis that high-tech employment would be provided, but this has not yet been forthcoming.

7. Woodstock

The Local Plan Review proposes to build 400 houses to the south east of Woodstock on the edge of the Green Belt.

A similar scheme on this site was proposed a dozen years ago and rejected by the Inspector. The same objections apply to this proposal including:

- lack of affordable housing;
- strain on the already overstressed infrastructure,
- adverse effects on local schools, medical services and retail centre;
- threats to World Heritage Site prospect;
- loss of greenfield amenity; and
- environmental damage.

The planned housing for Woodstock will overwhelm local services and risk turning this historic town into an Oxford suburb.

The Local Plan Review should instead seek to protect historic Woodstock from inappropriate development.

This site allocation should be removed from the Local Plan Review.