Oxford Local Plan 2036
Main Modifications Consultation
Response Form

Please note this form has two parts:

Part A – Your details
Part B – Your consultation response

Please ensure you complete **both** parts of the form. Where possible, we would prefer responses are provided using our online consultation system econsult. To respond in this way, please follow this link: www.oxford.gov.uk/mainmods

Responses should be limited to the Main Modifications and the Sustainability Appraisal of the Main Modifications. Comments will be considered by the independent Planning Inspectors undertaking the examination of both Local Plans

All responses must be received by 4pm on 27th March 2020 to:

Planning Policy
Oxford City Council
St Aldate's Chambers
109-113 St Aldate's
Oxford
OX1 1DS
Email: planningpolicy@oxford.gov.uk

PART A – Your details

Please note: we cannot register your representation without your details.	
Your Name:	Helen Marshall
Organisation (if applicable):	CPRE Oxfordshire
Address:	CPRE Oxfordshire, 20 High Street, Watlington OX49 5PY
Email:	campaign@cpreoxon.org.uk
Date:	20 March 2020

Do you wish to be notified when the Oxford Local Plan 2036 is adopted by the Council?	**YES** ☑ **NO** ☐

DATA PROTECTION

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2036 Main Modifications Consultation only, and we will only store your data until the Oxford Local Plan 2036 is adopted. Information you give in this form will be shared with the Independent Examiners.

Please note: Anonymous representations may not be accepted.

If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box:	☑
If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box:	☐

PART B – Your response

To which Modification(s) or part(s) of the Sustainability Appraisal does this response relate?	
Local Plan Modification Number(s) (Please state)	MM3 - Employment sites MM6 - Scale of Housing All Main Mods relating to minimum housing numbers eg MM 53/54/57/58 MM79 - Green Belt
Or, if you are commenting on the Sustainability Appraisal of the Main Modifications, please state which part(s):	

Do you Support or Object the proposed modification(s)? (Please tick)	
SUPPORT	☐
OBJECT	☑

If you object, please state why:	
The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182). Please tick any which apply:	
Not positively prepared - i.e. strategy will not meet development needs	☑
Not justified - i.e. there is no evidence to justify the modification	☑
Not effective - i.e. it won't work	☑
Not consistent with national policy - i.e. doesn't comply with the law	☑

Reason for SUPPORT or OBJECTION:

Please give details to explain why you support or object to the wording of the Modification(s) or part(s) of the Sustainability Appraisal of the Main Modifications. *(continue on separate A4 sheet(s) if necessary)*

MAIN MODIFICATION 3 - POLICY E1 and PARAS 2.2 - 2.3, and 2.9 - 2.10
EMPLOYMENT SITES
Given the recognised need for housing within the City, and the City's statements – though not borne about by their actions – that housing its people is its greatest priority, CPRE Oxfordshire believes that ALL SITES, INCLUDING ALL EMPLOYMENT SITES BECOMING AVAILABLE FOR DEVELOPMENT OR RE-DEVELOPMENT, SHOULD BE ALLOCATED FORTHWITH FOR HOUSING, not just small-scale ones, and none should be ringfenced for potential future employment as the City intends. Only in demonstrable and immediate exceptional circumstances should land that could be used for housing be allocated for any other purpose.
For example, Para 2.9 states 'Should these [Category 3] sites become available for re-development, they should be "considered" for housing'. We would amend this to read that housing use should be the presumption, and further that this should be the case across all employment categories. THE PRESUMPTION SHOULD BE THAT ALL AVAILABLE LAND WILL BE USED FOR HOUSING UNLESS OVERWHELMING EVIDENCE TO THE CONTRARY CAN BE SHOWN.
We recognise that the proposed wording of Policy E1 has been strengthened to allude to the need for housing, but still feel that the balance is unfairly tipped towards constraints, towards holding on to empty and uncommercial shop sites which could be better used for housing rather than a presumption in favour of housing unless proven impractical. We suggest the following changes:
'Proposals for residential development on employment sites will be GRANTED UNLESS:
a) IT CAN BE SHOWN THAT IT IS NOT POSSIBLE TO CREATE SATISFACTORY RESIDENTIAL LIVING CONDITIONS
b) THE BENEFITS OF HOUSING GAIN ARE OUTWEIGHED BY OTHER POLICIES IN RELATION TO ENVIRONMENTAL OR SOCIAL IMPACTS.

MAIN MODIFICATION 6 - PARAS 3.9 and 3.11
THE SCALE OF NEW HOUSING PROVISION
This Main Modification sets out the capacity-based housing target for the City (10,884) and the numbers to be off-loaded onto surrounding Districts (Total 14,300)
As evidenced at the EIP, the City has far greater capacity to accommodate its own housing need if (a) it adopted higher densities and (b) used available land for housing as recommended above. The 10,884 number must not be used as a target but as a low and inspirational base. CPRE proposes the addition of the following sentence:
'NOTWITHSTANDING THESE FIGURES, THE CITY WILL NOT TREAT THIS AS AN ENDORSEMENT OF ITS OWN MINIMUM PLAN NUMBER BUT USE EVERY EFFORT TO MAXIMISE ITS OWN HOUSING DEVELOPMENT THROUGH, FOR EXAMPLE, INCREASED DENSITIES, AND WILL NOT BE CONSTRAINED BY THE NUMBERS THAT OTHER COUNCILS HAVE BEEN PERSUADED TO TAKE.'

MAIN MODIFICIATIONS RELATING TO MINIMUM HOUSING NUMBERS
eg MM 53/54/57/58 and others

CPRE Oxfordshire welcomes the Inspector's instruction to Council to introduce minimum housing numbers for site allocations, which we believe adds valuable clarity to the Plan.
However, THIS SHOULD BE SUPPORTED IN EACH CASE BY A FIGURE GIVING MINIMUM HOUSING DENSITY. At present, this information is concealed. We cannot derive it and it is effectively impossible for an ordinary member of the public to interrogate or to understand whether the Council is even meeting its own unaspirational density guidelines.
CPRE Oxfordshire continues to believe that the City could and should be far more ambitious in its density targets. We note for example that the Secretary of State for Housing, Communities & Local Government has recently intervened in the London Plan, citing amongst other issues the need to optimise densities. The London Plan defines higher density residential developments as those 'WITH A DENSITY OF AT LEAST 350 UNITS PER HECTARE'. This compares to Oxford City's highest proposed density of just 100 dph for District Centres. Whilst acknowledging the difference in the two settlements, the distance between these two figures is illustrative of the City's lack of ambition in this regard. Evidence presented to the London Plan examination also suggests that 'increasing housing density in medium size town centres in suburban areas could improve productivity at the local scale'.
This is also a vital strategy in the situation of a Climate Emergency. For any given number of houses, higher density minimises both the amount of green CO2 absorbing land lost to development and travel to work, to the shops, and for social purposes and to the contrary facilitates walking or cycling. A compact city as Oxford should aspire to be is infinitely more climate friendly than a City sprawling out over its Green Belt which the Council intends to create.

See:
https://www.london.gov.uk/sites/default/files/letter_to_the_mayor_of_london_13_march_2020.pdf

https://www.london.gov.uk/sites/default/files/london_plan_topic_paper_on_density_policy_and_details_of_research_-_2017_final.pdf

MAIN MODIFICATION 79 - Para 9.145
GREEN BELT

CPRE Oxfordshire opposes the release of Green Belt sites since the exceptional circumstances have not been proven. Modifications as outlined above - prioritising sites for housing rather than employment and increasing housing density - would significantly reduce, if not entirely remove, the need for invasion into the Green Belt.
Looking at the housing figures now provided alongside each allocation, the Green Belt sites account for a proposed 734 houses.
This ls less than 7% of the City Council's total estimated (in our view under-estimated) capacity. In other words, HOUSING DENSITY WOULD ONLY HAVE TO BE INCREASED BY A FRACTION ACROSS THE REMAINING SITES TO AVOID ANY RELEASE OF GREEN BELT LAND within the City boundaries.

Summary of Representation:
If your reason for support or objection is longer than 100 words, please summarise the main issues raised.
- Fails to prioritise need for housing if and when employment sites become available - the wording is improved, but still includes too many constraints. There should be a presumption in favour of housing unless circumstances dictate otherwise. - Fails to set sufficiently ambitious targets on housing density overall, and fails to clearly identify housing densities at respective sites. - Unnecessary and unjustified intrusion into the Oxford Green Belt.