

Oxford Local Plan 2040 - Preferred Options Consultation, October/November 2022

A CPRE Oxfordshire Guide to Responding

Oxford City Council is seeking views on the latest stage of the Oxford Local Plan 2040. Getting this Plan right is a vital way of protecting our countryside. Have your say BY 14 NOVEMBER.

You can find all the details of the consultation, including the Preferred Options and background papers, the various options for responding (incl. short & long questionnaires) and details of drop-in sessions with City planners, here: https://www.oxford.gov.uk/info/20067/planning_policy/1460/oxford_local_plan_2040

IF YOU ONLY DO ONE THING - A 5-minute CPRE Oxon Response Guide

Email: planningpolicy@oxford.gov.uk

Re: Oxford Local Plan 2040 Preferred Options Consultation Response

In your own words, please tell them:

- a) **The concept of 15 minute neighbourhoods is welcome but should NOT trump Green Belt protections. Another Green Belt review is not needed at this stage. (Policies S1 & S2)** The Oxford Green Belt is vital for the City and its residents as well as its neighbours. There are already 20,000 houses planned for the Green Belt which will put the countryside and infrastructure under huge pressure. The key point about the Green Belt is its openness and permanence. The focus should be on celebrating and improving it as a vital resource for health & wellbeing, biodiversity, food production and climate mitigation.
- b) **Housing numbers should be no higher than the Government's Standard Methodology which already includes a 40% uplift for affordable housing. (Policies H1 & H2)** It is important to meet genuine housing need but pushing up numbers to meet arbitrary growth ambitions is not acceptable, especially when there is no capacity to deliver these houses within the City's boundaries. This would inevitably lead to an overspill onto surrounding Districts, putting the countryside and Green Belt at risk. There are arguments that in fact figures should be lower given the climate and nature emergencies, Oxford's constraints in terms of flood plain and Green Belt, and the over-delivery against need already embedded in the Oxfordshire Housing & Growth Deal that runs to 2031. The optimistic economic vision of the Oxfordshire Local Industrial Strategy predates Brexit, Covid, the Levelling Up agenda and the current global and UK economic situation and can no longer be considered up to date evidence.
- c) **Clear policies on housing density, hedgerows and renewable energy should also be included in the Plan.**

If you have a bit more time... A 20-Minute CPRE Oxon Response Guide

If you have a little more time, our suggestion would be that you fill in some of the 'long' questionnaire available here:

<https://consultation.oxford.gov.uk/planning-services/oxford-local-plan-2040-in-depth-questions/>

(NB There is also a '[short' questionnaire](#) but in our view it gives very little scope for genuine responses.)

It is of course up to you how many of the questions you answer – you certainly don't have to tackle all of them. Here's a few thoughts from our end that we hope will be of help, but we do encourage you to use your own words. For brevity, we have picked out what we consider to be the key issues/questions – see the full CPRE Oxon draft response for further detail.

(The answers marked in red are where we suggest challenging the Preferred Policy Option/s.)

1.1 S1 – Directing new development

The concept of the 15 minute neighbourhood is a good a way to ensure more sustainable communities, with appropriate access to services and facilities.

However, this should not overtake the importance of protection of the Oxford Green Belt, which is vital to ensuring the continuing sustainability of the City as a whole, as well as the surrounding settlements.

Policy Omissions – Since there is no question which allows you to make general comments or suggest additional policies that they have excluded, we suggest you include any thoughts in this first box.

1.2 S2 Approach to greenfield sites

A further review of the Green Belt is NOT required.

The main characteristic of the Green Belt is its openness and permanence. The Oxford Local Plan 2036 was only adopted in 2020 and included a review of the Green Belt and the removal of a number of sites within the City boundary. Taking into account the Green Belt allocations by neighbouring authorities to meet Oxford's housing need, there are now nearly 20,000 houses being brought forward within the Green Belt. There is no justification for a further review at this stage. Instead, the City Council should look to bring forward a policy that seeks to capitalise on the Green Belt as the amazing resource it is for local residents, seeking to enhance its environmental features and recognising the important role it plays in improving people's mental and physical wellbeing.

2.1 H1 Housing requirement

The *Preferred Option*, a constraint-based housing requirement, is acceptable but ONLY in relation to Standard Methodology figures to assess need.

The provision of housing to meet genuine need must be supported. The City argues that even this level of housing cannot be delivered within its boundaries. A constraint-based housing requirement is therefore logical i.e. that the housing target in the Plan should be constrained to a level that is actually deliverable and excess need met elsewhere. There are two caveats that should be clearly referenced within the Policy:

- a) This Policy brings with it a responsibility to leave no stone unturned in exploring opportunities for bringing forward housing within the City, before seeking to offload onto surrounding Districts. This includes prioritising sites for **housing rather than employment** (e.g. the opposite of the current

North Oxford site which is looking to deliver 4,500 jobs but only 480 houses), **maximising density** and **exploring alternative uses for existing sites** (e.g. transformation of the Botley Road retail 'sheds' into housing).

- b) This Policy should only apply to housing related to **genuine need**. It should not extend to higher housing targets based on the City's 'policy on' choice of seeking significant growth, which would be likely to have unacceptable environmental and social impacts, including potential erosion of the Green Belt.

2.2 H2 Housing need

Policy Option A should be the Preferred Option with housing numbers no higher than the Government's Standard Methodology which already includes a 40% uplift for affordable housing. It is important to meet genuine housing need but pushing up numbers to meet arbitrary growth ambitions is not acceptable (Policy Option B), especially when there is no capacity to deliver these houses within the City's boundaries. This would inevitably lead to an overspill onto surrounding Districts, putting the countryside and Green Belt at risk. There are arguments that in fact figures should be lower given the climate and nature emergencies, Oxford's constraints in terms of flood plain and Green Belt, and the over-delivery against need already embedded in the Oxfordshire Housing & Growth Deal that runs to 2031. The optimistic economic vision of the Oxfordshire Local Industrial Strategy predates Brexit, Covid, the Levelling Up agenda and the current global and UK economic situation and can no longer be considered up to date evidence.

2.3 H3 Affordable housing

Option A appears to strike the best balance between delivering the highest amount of affordable housing overall whilst at the same time prioritising provision for Social Rent to deliver for those most in need.

Options E and F are not acceptable (not maximising affordable housing or not having a policy on affordable housing).

3.1 E1 Employment strategy

Option A (*preferred option*) is the most acceptable as this would prioritise housing, identified as the City Council's priority, over employment provision.

3.2 E2 Making best use of employment sites

The alternative Option C should be preferred as this would provide maximum flexibility in terms of identification of land for housing, particularly in relation to retail (the 'sheds' along the Botley Road appearing to be a good example).

3.3 E3 Allowing housing on existing employment sites

Option A would allow more of Oxford's housing need to be met within its boundary.

3.8 E8 Short stay accommodation

Option D, resisting new short stay accommodation, is listed as a detrimental option but should be the Preferred Option. Given the level of housing need in the City, it is important to control the loss of residential properties, which could be being lived in by permanent residents.

4.1 G1 Protection of green infrastructure network

There is a policy omission – the Local Plan needs a specific new policy on hedgerows. Specific mention and targets relating to hedgerows should be added in, with both protection for existing hedgerows but also commitment to the creation of new hedgerows.

The Climate Change Committee (CCC) has recommended a 40% increase by 2050.

We draw attention also to Oxfordshire Treescapes Our Land, Our Future report which says that meeting the 40% increase recommended by the CCC means: “Increasing the proportion of the county’s field boundaries that are hedged from 47% to 66%, giving us 18,200 kilometres of hedges compared to the current 13,000 kilometres”.

On new developments, developers should be required to plant hedgerows and hedgerow trees around the borders and be obliged to protect and maintain them for at least the first five years.

4.4 G4 Biodiversity net gain

Option B, a higher than 10% biodiversity net gain, should be the Preferred Option. Evidence was provided by the environment sector, as part of the Oxfordshire 2050 Plan process, to justify a 20% net gain approach across the County and this should be carried forward within the Oxford 2040 Plan. Describing this option as ‘detrimental’ because some of the mitigation might have to be carried out elsewhere in the county is a short-sighted approach.

5.4 R4 Efficient use of land

The Preferred approach should be Option A, that requires efficient use of land, combined with Option C, which would apply minimum density requirements across the whole city, for various types of location.

However, the Preferred Options document fails to provide any options with regards to what these minimum densities should be.

The Plan should spell out the multiple benefits of higher density in more detail – i.e., not just saving greenfield but generating housing that is more affordable to buy and run and more efficient in terms of heating/transport so better for the climate too. Well-designed terraced housing and 2-3 storey units can deliver high density development that is attractive and desirable.

The Local Plan also requires a policy on the provision of renewable energy. The City should commit to work with other local authorities to bring forward a county-wide strategy, supported by public consultation and engagement, setting out the amount and spatial location for renewables projects. Meanwhile, a specific policy is required setting out how the City will assess planning applications for low carbon and renewable energy generation.

5.6 R6 Water quality

The *preferred option* should be Option B, a bespoke policy on water quality. Given the importance of water quality to people and nature, and the known challenges around the current quality of our water sources, we think a bespoke policy is more than justified.

5.8 R8 Amenity & environmental health impact of development

Option A, the *preferred option*, is acceptable

However, although Oxford city is an urban area, there is no mention within the report of protection of the “dark skies” in the countryside which surrounds it and is vital to the outlook from within the city. There should be both a policy to minimise light pollution on new development but also to reduce existing light pollution and to protect dark sky areas such as South Park.

6.3 DH3 View cones & high buildings

Option E should be the preferred option, which would include in the policy details about what is expected in retaining the significance of views out from key points in the central conservation area and note aspects of the views that are of particular significance in the setting of heritage assets, in particular the relationship with the landscape setting of the rivers and the surrounding hills that provide a green backdrop and should be preserved.

8.2 South Area - Cowley branch line

Para 8.10 – *“The opening up of passenger services along the Cowley Branch Line will provide a welcome public transport alternative for this area of the city.”*

It is disingenuous to present this as a viable and deliverable project. The Network Rail report on the Oxford Rail Corridor implies that the only interested passenger rail operator for this line, Chiltern Railways (aka Deutsche Bahn) would consider running a passenger service to Cowley, after 2028, only if enough commuter passengers from the proposed new Cowley stations bought ‘through return tickets’ to London (i.e. not local commuting). The public bus service from Cowley to Oxford Station will always cost much less than using a passenger railway to carry workers into that part of Oxford, and long-distance commuting is now contra to local and national policy. This project was proposed by the National Infrastructure Commission before any realistic appraisal of its feasibility was undertaken by Network Rail.

Whilst further exploration of this scheme is desirable, it is inappropriate to use it as a basis for planning the location of development without much greater certainty as to its delivery.

9.5 Evidence Studies

Evidence studies: A Character Assessment of Oxford in its Landscape Setting: 2022 Update - Addendum Draft Report

This document manages to devote two entire sections to describing what makes the setting and landscape of Oxford distinctive without once mentioning the Oxford Green Belt, which appears to us to be a serious oversight.

We hope this response guide has been of use. If you aren't yet a CPRE member, please do consider joining us or making a donation to support our work so that we can continue to provide help to local communities on these kinds of issues. CPRE Oxfordshire is an independent charity, entirely reliant on its local members and supporters. Find out more here: <https://www.cpreoxon.org.uk/get-involved/donate/>

*Meanwhile, we would be happy to receive any constructive feedback.
With thanks from all at CPRE Oxfordshire.*

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