

Oxford Local Plan 2036 : Preferred Options Consultation

Response from the Oxford Green Belt Network.

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Introductory Comments

The Oxford Green Belt Network (OGBN) was set up 20 years ago in response to a perceived need both to protect the Oxford Green Belt from inappropriate forms of development and to make its nature and benefits more widely known. We work principally with parish councils and with amenity groups that share our aims.

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.” (paragraph B256 of the adopted Cherwell Local Plan). Complementary policies were adopted which sought to encourage growth in locations away from the historic city. We support such policies.

However, the City Council’s planning policies in recent years have not only ignored the need to “restrain development pressures” but have actively sought to encourage further economic development in and around Oxford. In doing so we consider that it will therefore “damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area”.

We do not believe that Oxford should stand still. The Local Plan is an opportunity to create a more balanced city, making the most of its strengths while acknowledging constraints and retaining its best qualities. We recognise the great potential of university research activity to generate “spin out” enterprises and believe this should be encouraged and supported. However we believe that this can be done without the need to attract further employment into the city, as your preferred options do. The Council could be much ‘smarter’ and selective in its provision of employment sites within the city. It could also seek to encourage the relocation of existing activity where this does not have to be within the city. That is a strategy that we believe would be consistent with the aims of the Oxford Green Belt.

Chapter 2 : Employment Uses

Overall Comments on Chapter 2

We consider that the Council is pursuing a strategy of encouraging ever increasing levels of employment within the city and that this is wrong and unsustainable. This was clearly a concern raised by many during the previous consultation.

As you say, Oxford has high levels of employment already, so further employment opportunities are not needed for its population. Giving priority to employment growth will:

- add to problems of traffic congestion across the city and add to pressure on the severely physically constrained and already congested historic city centre
- thereby risk destroying the very things that make Oxford an attractive location
- make it more difficult to provide much needed housing sites within the city area
- exacerbate, rather than improve, the availability and affordability of housing in and around the city
- put pressure to release land in the Oxford Green Belt which exists to protect the historic city from over-development and to provide 'green lungs' for the city.

We emphasise that we consider that this is unsustainable and not therefore compatible with the National Planning Policy Framework (NPPF).

It is therefore undesirable to continue to concentrate employment growth within the city. Nor is it necessary. As you say, many of the businesses arising from spin-offs from university research are 'knowledge based'. With the availability of fast internet connections there is no need for many of them to be physically in close proximity. There is also no need for some of the activities associated with Oxford's core employers to continue, for ever, to be located within the city. A particular opportunity arises to re-locate some activity at Bicester where there is suitable land for businesses but it is in danger of becoming dominated by low-value and low employment warehousing. There are many other locations within the county and further afield in areas which have substantial supply of land for employment, relatively inexpensive housing and good infrastructure and which would welcome this development.

We therefore consider that the City Council should:

- seek to provide suitable locations for only those employers which it is essential should be located in Oxford
- co-operate with other councils in Oxfordshire and other parts of the country to encourage other potential employers to locate to suitable and less pressured locations elsewhere in Oxfordshire and in the country as a whole, while still maintaining strong and enduring links with Oxford
- work with existing major employers in Oxford to identify which of their activities could in future and over time be located elsewhere

Comments on Options in Chapter 2

Opt 1 : Category 1 Employment Sites

For the reasons above we do not support option 1A.

A modified version of option 1B is preferable and we support what you say about the opportunity to provide staff accommodation for key employers. Sites should be considered on a case by case basis and we think it is not necessary to insist that no net loss of employment floorspace results. In particular, we consider that you should not proceed with the Northern Gateway development for substantial employment uses and should consider using suitable parts of the site for housing.

Opt 2 : Category 2 Employment Sites

We do not support option 2A and support option 2B (allow redevelopment of category 2 employment sites to other uses) as this would help to redress the imbalance of employment and housing land provision in Oxford and would support our preferred approach of decentralising employment generating activities from Oxford to other locations wherever possible.

Opt 3 : Category 3 Employment Sites

We support your preferred option 3A allowing these sites to be redeveloped for housing and other priority uses as it is in accord with our preferred approach outlined above.

Opt 4 : B8 Uses

We support a modified version of your preferred option 4A. We consider that B8 sites could be changed to B1, B2, Sui Generis, community uses and residential uses (omitting your qualification), as appropriate on a case by case basis, in the interests of the efficient use of land and redressing the imbalance between housing and employment land provision in Oxford.

Opt 5 : Teaching and Research

We recognise the importance of the universities and hospitals to the city of Oxford, its economy and population and that their core activities will continue to be undertaken in the city. However some other functions and associated activities could well be undertaken at other locations across the county and beyond. We therefore suggest an alternative policy option in which the Council will work with the universities and hospitals to identify which functions and activities could be relocated away from Oxford and to encourage that relocation. This would free up sites for the expansion and growth of those activities which it is essential to locate within the city while not creating additional pressures on infrastructure or competing with other important land uses.

Opt 6 : Small businesses

There seems to us to be no reason why small businesses and startups should not be located on Category 1 sites. It is likely that this already happens. Expansion of small businesses should also be encouraged on locations away from Oxford wherever feasible, while maintaining an Oxford presence and other strong links if appropriate.

Chapter 3 : Housing

Overall Comments on Chapter 3

We do not accept the forecasts of the Oxfordshire SHMA. The assessment of a need in the range of 24000-32000 is not credible when compared with the most recent (2014-based) DCLG household projections for an increase of some 10,800 households in Oxford between 2016 and 2036 (taking account of natural change and projected migration). The SHMA assessment is based on a large number of employment developments proposed by commercial development companies actually coming to fruition, bringing employees in to the area and increasing the demand for housing. We do not believe that many of these developments will occur

especially in light of the relatively slow development and take up of sites such as Oxford Science Park and Oxford Business Park. They are also unnecessary as many of their potential occupiers could equally well be located elsewhere in the country.

As we have said above, the strategy of encouraging further employment growth in and around Oxford is, in any case, misguided. It both takes away land that could be used for much needed housing and also creates additional demand for yet more housing. Oxford certainly has – and has always had – relatively high housing costs and we acknowledge that this causes problems for some employers. However the creation of yet more jobs, stimulating demand for housing, is self defeating and will not address the problem of housing affordability. We have already outlined an alternative approach which would encourage the decentralisation of employment and give priority to housing.

Comments on Options – Chapter 3

Opt 9 : Overall Housing Target

None of the proposed options is acceptable. The SHMA's objectively assessed need (OAN) is based in part on unnecessary levels of employment growth (as explained above). Our preferred approach is to reassess the OAN on the basis of policies to decentralise employment growth away from Oxford City.

The most recent (2014-based) DCLG household projections are for an increase of some 10,800 households in Oxford between 2016 and 2036. This is an appropriate basis for planning future housing requirements. By making use of some employment sites for housing, by making better use of brownfield sites, and by increasing densities where feasible we consider that this requirement could be comfortably accommodated within the city. This would be a sustainable policy, resulting in more balanced and less damaging development within Oxford and would not require any building on the Oxford Green Belt.

Opts 10 & 11 : Affordable Housing

We support the aim of making housing in Oxford more affordable. However, we consider that the policies proposed will be counter productive. We note that 'affordable' is defined as a percentage of the rent or cost of market (and by implication 'unaffordable') housing. As this percentage is normally 80% it remains very high and would not be considered in 'common-sense' terms to be affordable in reality. In addition, by increasing overall demand as the proposed strategy does, market prices are likely to increase thereby increasing the cost/rent of 'affordable' housing still further. Finally, the requirement for the market element to, in effect, subsidise the 'affordable' element is also likely to push up the cost of both.

Chapter 4 : Environment.

Comments on Options

Opt 29: Previously Developed Land

We support your rejected option 29B to focus development just on previously developed land and we reject any proposals to develop on Green Belt land. Green Belt land is permanent and intended to protect the city from the consequences of over-development. It is unacceptable to build on it.

Opt 31 : Green Belt

We support your rejected option 31D : Green Belt sites should not be allocated for housing. We reject options 31A, 31B and 31C.

Green Belt is intended to achieve an overarching aim. “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.” (Cherwell Council adopted local plan).

Green Belt is meant to be permanent (NPPF para 79). Protecting Green Belts is enshrined within the core planning principles of the NPPF (para 17). The NPPF is also clear that Green Belt is one of the designations which mean that local plans do not have to meet ‘objectively assessed needs’ (para 14). Furthermore Government guidance states that unmet housing need does not constitute very special circumstances for building on Green Belt. (Planning Practice Guidance : paragraph 034 Reference ID: 3-034-20141006).

We consider that Green Belt studies, such as quoted in your document, which attempt to assess and score land within the Green Belt in relation to the five NPPF purposes are fundamentally flawed. Those purposes are alternatives and not intended to be additive. It is not acceptable to suggest that areas assessed with the lowest scores can be removed from the Green Belt as, if taken to a logical conclusion, this could result in all land eventually being removed.

The Oxford Green Belt should therefore be maintained as an entity in order to support its overriding aim. The principle of inappropriate development anywhere within it should be resisted. To do otherwise is to set precedents which will undermine its purpose. Our objection to building on Green Belt equally applies to land in the surrounding District Council areas and we think that by adopting a different development strategy the Green Belt can and should be maintained.

Finally, we disagree strongly with the statement on page 61 that “any site in Oxford is likely to be a sustainable location for new development.” This implies either a misunderstanding or a very narrow interpretation of the term ‘sustainability’.

Oxford Green Belt Network, August 2017.