

PARTIAL REVIEW OPTIONS CONSULTATION
CHERWELL Local Plan 2011-2031 (Part 1):
Partial Review – Oxford’s Unmet Housing Need

This response should be read in conjunction with [Cherwell DC’s consultation document available here](#).

Other resources:

- [Cherwell DC’s public consultation – full documentation](#)
- [Local Plan Partial review Part 1 – Evidence base](#)

Principal Response from the Oxford Civic Society (OCS) Planning Group to the Options Consultation

1. The Oxford Civic Society Planning Group offers the following principal response to the Options consultation. We have also completed the Representation Form, but this paper enables us to set out our arguments in a more coherent way. We welcome the consultation and recognise the effort made by Cherwell District Council (CDC) to present a thorough and detailed analysis of the options. CDC demonstrates a commendable commitment to cooperation with other local authorities.

Absence of a proper strategic framework, integrating transport and development, covering Central Oxfordshire

2. OCS argues in the [Oxford Futures report](#) that the issues of housing and employment accommodation locations, and the transport infrastructure connecting them, need to be considered on the basis of the economic region of Central Oxfordshire, rather than fragmented into five separate Local Plans, not even coordinated chronologically, nor coordinated with transport infrastructure proposals.
3. The transport assessments of sites close to Oxford are necessarily made by reference to the policies and proposals contained in the 'Oxford City' part of Oxfordshire's LTP4. However because the LTP process preceded the acceptance by the Oxfordshire Growth Board (OGB) of the programme of work required to fulfill Oxford's unmet housing need, the content of LTP4 has no regard to the likely scale or location of additional development close to the city. OCS trusts that Oxfordshire County Council’s proposals for new P&R car parks, BRT routes, local rail investment, and so on, will be adjusted once the outcome of all the Districts' Local Plan reviews are known. It is however a great pity that the opportunities for linking major housing allocation and strategic transport investment as an integrated process have been lost. This flaw needs to be addressed

for the future.

4. OCS urges the OGB to promote a more strategic process in the next planning round. The transport and development exercises initiated by the National Infrastructure Commission for the 'Oxford-Cambridge' corridor should be replicated in Central Oxfordshire.

Housing need

5. It is worth noting that, in the case of Oxford, three quarters of the City's housing need identified in the SHMA is "To meet affordable housing need in full". By contrast, "To support economic growth" accounts for a small proportion of the City's need: in other words, Oxford's need derives overwhelmingly from the need for affordable housing, not economic growth.

Effect on the Green Belt

6. The evidence of the OGB's study of spatial options ([PR14 in Cherwell's Evidence Base](#)) is that development should be located close to Oxford and accessible to its main centres of employment. This, coupled with the Board's Green Belt Study ([PR13](#)), seems to represent acceptance by the majority of councils of the important principle that potential development sites might have their Green Belt (GB) designation removed on the basis of the 'exceptional circumstances' prevailing in the Oxford area.
7. Cherwell DC have identified a very large number of potential sites for accommodating the additional development, in 9 different 'search areas' across the District.
8. It seems sensible, considering that these sites are to accommodate Oxford's unmet need, that:
 - a. It would be better to minimise travel distances to Oxford employment sites
 - b. It would better to either be close to public transport infrastructure, or large enough to justify investment in it
 - c. Sites should not be located where they could compromise future transport infrastructure (e.g. railways or roads)
 - d. Site locations should enhance sustainability (e.g. of shops, schools, churches, community centres, recreation facilities), but not destroy historic character
 - e. Sites should either be large enough to justify their own new social infrastructure, or integrated with places already

possessed of significant social infrastructure

- f. Sites should provide an acceptable environment for residential use, e.g. they should not be compromised by noise, vibration and pollution from major highways and railway lines, or flight paths.
9. Of the 'search areas' examined by CDC, sites in Areas A and B (mostly) are located in the GB, but are clearly preferred in terms of meeting the above criteria. In planning terms, the development of any housing on any sites within the GB, or the adjustment of the GB boundary, will require conclusive evidence that there are 'exceptional circumstances' justifying such development.
10. The CDC consultation paper notes that:
- "... the National Planning Policy Framework requires any changes to the Green Belt to be made through the Local Plan process. Any such proposals should include:*
- 1. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and*
 - 2. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes."*
11. The circumstances currently prevailing in and around Oxford appear to meet these criteria. Development on sites outside the Green Belt would inevitably be further from Oxford and its 'unmet need', and less sustainable, in terms of the appraisal criteria used by Cherwell DC.
12. As a general principle, it can be argued that sites beyond the GB (if they are intended to fulfill Oxford's needs) should be disregarded as long as there are sites within the GB which can be removed without serious detriment to one or more of its official objectives. (This is the logic of the Growth Board's GB Study). The quality of different parts of the GB varies significantly, as the Study showed. It follows that treating the GB as a uniform entity, regardless of the housing, transport and other adverse human implications of doing so, is not in the public interest. However, we support the principle that removing part of the Green Belt should result in compensating designations of land elsewhere.

Detailed locations

13. The sites which have the best 'scores' on the sustainability and transport criteria used by Cherwell DC are, basically, either side of the Banbury Road (A4165), north of Cutteslowe, including the North Oxford Golf Course, and some sites on the southern fringe of Kidlington. Development here would effectively extend the city, and enable provision of improved access from the Northern Gateway to Oxford Parkway station, but, unless carefully designed and limited in extent, development would potentially close the 'Kidlington Gap', making Kidlington contiguous with Oxford.
14. The Green Belt Study rates the importance of these areas very highly in contributing to the five objectives of the Green Belt; any development would be highly controversial. The golf club fulfils a recreational purpose, whilst maintaining an attractive 'green' appearance. Part of the site area identified may have flooding propensity. There also may be a possibility of an Oxford northern bypass in this vicinity, as has been suggested by the County Council, if the A40 were to be made dual carriageway from Witney. Despite the suitability of these sites, the constraints would appear to preclude any very substantial development.
15. The sites which appear next most appropriate are those to the west of Kidlington (identified as Sites 23, 24, 74, 20, 34, and 126). These total 235ha in area, so are considerably larger than would be needed to accommodate 4400 houses in high-quality contemporary urban design. Although in the Green Belt, this area is assessed as much less critical in terms of contribution to its objectives. The Oxford Canal runs past several of these sites, providing opportunities for attractive landscape incorporation and recreation.
16. In transport terms, these sites lie in close proximity to the A44, along which there are already good bus services linking Oxford, Woodstock and Chipping Norton, more development would justify further improvement in public transport services. The opportunity would exist for the re-construction of a Kidlington railway station (closed in the 1960's) serving not only the new development, but the whole of Kidlington, on the Oxford – Banbury line; this would be well placed to improve the transport services of Oxford, whilst being less attractive to London commuters (since the route would be slower than from Oxford Parkway), hence housing at this location would be more likely to serve Oxford's need (rather than London's), than if placed elsewhere. OCS believes there is great

potential for a development-related SwiftRail or tram-train dimension to be added to the local rail network.

17. Having regard to the very limited amenity value of land to the east of the A44 at Yarnton, Begbroke and in-between (i.e. sites 74, 20 and 126), it would make sense to make an initial release of parts of these sites which are accessible to (i.e. within about 400m-500m of) the existing bus service on the A44. The layout of these initial parts should allow for the possible future development of the (large) intermediate area between them and the west of Kidlington - this clearly being one of the main candidates for longer-term development in Central Oxfordshire. As mentioned above, the area could be served by train or tram-train on the Banbury line and/or by a new north-south bus-served spine through the development.

Maintaining a Five Year Land Supply

18. We suggest an innovative approach which places the Cherwell DC in the role of overall spatial growth 'Master Planner'. As local planning authority it could be argued that this role is already assumed. We suggest however that the role of the DC in determining where infrastructure for development will be located should be emphasised, asserting the DC's strong negotiating position with developers. This negotiation will include further capturing land value increases associated with the infrastructure provision. The process should not be led by the developers.
19. The assertive role will include building on the work done by the District and County to indicate improvements to road and rail links which enhance the value of the strategic sites. It will also include continued work on other infrastructure components and evaluating the potential financial and economic impacts of different patterns of density and growth rates in terms of both private investment and Council tax revenue as well as congestion or travel time over the next 30 years (at 5-year intervals). Asserting this role should make it clear that the development of the strategic sites is to benefit the DC as well as the developers – the certainty that development of these sites will be associated with adequate infrastructure provision and adequate financial and economic returns should help to ensure maintenance of the land supply.

Monitoring Delivery

20. See the preceding section. Monitoring the negotiation process will help to identify improvements to the financial and economic analyses (i.e. through assessing the validity of assumptions and risks identified at the outset). This will enable focused changes to policy, for example enhanced land value estimation, changes in green belt boundaries and investment in local rail, with the aim of facilitating further infrastructure and housing investment.

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