

## Response to Cherwell Local Plan Part 1 - Partial Review - Options Consultation

These are the comments of the Steering Committee for the Wolvercote Neighbourhood Forum on the Consultation on the development opportunities in Cherwell to meet Oxford's housing needs.

The comments follow the order of the questionnaire, cross-referencing when necessary. However, this order does not coincide with the relative importance we place on the issues, and we would like to emphasize the following points.

- The importance of the Green Belt seems to have been almost entirely disregarded, contrary to both National policy and strong local feeling.
- There is an over reliance on assumed future developments in transport infrastructure that are by no means guaranteed to happen.
- Routes from and around the selected sites for development (e.g. 38 and 50) are already congested and unsuitable for further traffic.
- Developments in areas close to major routes are unsuitable for housing, with young children and the elderly particularly at risk.
- A major development at PR19, Shipton on Cherwell Quarry, should be considered. This would be an opportunity for a self-contained community to be created, rather than merely increasing population density in existing areas.

### THE CONSULTATION

- Residents in north Oxford should have been given timely notice of the Consultation process and provided with conveniently accessible explanatory exhibitions. For consultation to be meaningful it has to reach those most affected. It is clear that this has not happened from the many concerns expressed to us, to Cherwell Council and made public by our residents.
- The design of the Consultation is not satisfactory. The documents are so substantial and the overlapping of sites and maps so complicated that it is difficult for people to comprehend them adequately without devoting considerable time to them. This is very challenging for those who have to read them electronically or in libraries.
- The questions asked frequently invite repetition because of the examination of overlapping and interconnected sites and it is hard to see how responses will be evaluated fairly.
- A major issue, addressed later, is the fact that a consultation focussed on Cherwell is able to argue that development in certain places is sustainable because it is adjacent to existing services which are the responsibility of other authorities, taking no account of the fact that they are already inadequate and not easily capable of improvement in the near future or ever.

### HOUSING ALLOCATION

The initial question is whether the allocation to Cherwell of 4,400 houses to meet Oxford's unmet housing need is appropriate (Question 1). Of course the need must be met and Cherwell will have to take a share (Question 2). In particular there is a need for social housing and housing for key-workers. However, housing has to be in an appropriate location.

- The SHMA's estimate, not unquestioned here (2.4 and elsewhere), is based on the assumption that there will be a large and desirable growth in employment in Oxford. We have considerable reservations about the consequences of unrestrained growth damaging the historic city and its environs. While we endorse the need to support the local economies of Oxford and Cherwell, we have serious reservations about the projected growth in the SHMA SO17 (Question 7).
- Oxford's unmet need is for affordable houses. If the percentage of houses required from developers by other Oxfordshire councils was the same as Oxford's, that is 50%, the total number of houses required would be lower. The councils should all be asked to agree to requiring the same percentage as Oxford and the figures of houses needed should then be recalculated.
- The number of homes allocated by the Oxfordshire Growth Board to the area immediately north of Oxford (2.37), given the location of primary sources of employment (Figure 5), is perverse if there is a serious concern for maximising sustainability. Commuting distances from other directions to major employment sites tend to be shorter from other directions than from north of the city.
- The argument that there are good connexions from areas A and B is a matter for concern since it neglects the fact that there is already traffic congestion and consequent serious pollution on the roads serving these areas. (That there are these good connexions is repeated frequently in favour of developing a number of the sites).

## **OTHER ISSUES TO BE CONSIDERED**

There are other issues that need to be given consideration (Question 3).

- Insufficient consideration has been given to the protection of the Green Belt. Proposals to consider development on the Green Belt as a matter of course are contrary to Government policy. This issue is addressed below in relation to areas of search.
- The likely pattern of commuting from Oxford Parkway will be to London. This was not considered in the SHMA that is based on historic commuting patterns and takes no account of the attraction of an easily accessible rail route to London. Market houses on any development adjacent to the station will be almost certainly purchased by London commuters. These sites will be attractive to developers but will do nothing to provide private housing, and certainly not affordable private housing for people working in Oxford. Developments of this kind will not reduce house prices nor encourage local community. The objectives in SO18 (Question 7) are admirable, viz - affordable access to the housing market for new entrants and key workers - but will not be met by this kind of development unless there is a mechanism for allocating houses to these groups at substantially lower cost than the market would dictate.
- If houses in Cherwell are to meet Oxford's unmet need, SO16 (Question 5) needs to be changed to ensure that the City has nomination rights in housing allocations in these developments.
- Positive attempts should be made to ensure that those living in new developments enjoy a good quality of life as members of a well-balanced community in a healthy environment free from air pollution.

- We endorse the draft vision (Question 4) and agree with the feedback from Cherwell residents (5.5), but we need to see a plan to ensure that the objectives expressed in the Vision are delivered.

## **TRANSPORT**

The achievement of a complementary relationship between housing development and the County Council's Local Transport Plan and the Oxford Transport Strategy SO19 (Question 8) seems unlikely. Its success would depend upon the development of a much improved infrastructure in advance of development. In relation to some of the sites considered it is unlikely that the infrastructure is capable of the necessary improvement.

## **AREAS OF SEARCH**

There is a major objection, perhaps the strongest objection of all to many of the defined areas of search (Question 9).

- The sites put forward in the Consultation have not been selected as a result of a considered planning policy but are those put forward by promoters who are landowners or developers simply for commercial advantage. We would have expected more professional discrimination in the presentation of a list of sites for consideration.
- These sites should not have included the extensive areas of Green Belt as a matter of course. Development of the Green Belt is not in accord with the National Planning Framework. According to para.79 of the NPPF (March 2012): 'The Government attaches great importance to Green Belts. The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. And 'Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial uses of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land' (para. 81). The defence of the Green Belt is very important to our residents in providing these amenities and in preventing urban sprawl. Development is only allowed on the Green Belt when there are exceptional circumstances and every one of the exceptional circumstances is met ( NPPF para. 87; CS4). Oxford City's Core Strategy clearly states that the Green Belt 'helps to retain the distinctive physical form of the city' and development must not detract from 'the landscape setting or special character of Oxford'. Development must not be permitted leading to the merger of 'distinct built-up areas' (Policy CS4). We would have expected therefore that only those areas of Green Belt where it was believed that there might be a compelling argument for a change of designation and where all the exceptional circumstances might be expected to be met would have been included. A decision about the size of sites to be put forward was made. A decision about sites in the Green Belt is much more important.

## IDENTIFIED SITES

We have specific comments on some of the sites identified in the Consultation (see below).

However, we believe that there is a fundamental error in the proposal of sites. The Government approval of the Garden Village at Eynsham is an interesting model. Rather than considering a multitude of sites many of which will result in urban sprawl, have no identity, do not encourage community and are near to already congested and polluted roads, we would prefer to see the establishment of a sizeable village development in a rural setting large enough to be a separate mixed community with its own facilities and infrastructure serviced by public transport, if possible a railway. Careful planning and design could provide an environment where people could live in safety, free from noise and poor air quality. There is a real opportunity here to produce something of high quality. This is the kind of bold initiative one would expect of competent professional planning. One site that might be more carefully considered with a view to this kind of development is Site 19, Shipton on Cherwell Quarry. This is an old industrial site that could be described as brownfield.

We have the following observations on some of the identified sites. (Question 11).

- **Sites 38 and 50 north of Oxford (Site 50 includes part of 38 and 123).**

We disagree strongly with the favourable assessments of sites 50 and 38 in respect of SA1 (Building Sustainable and Affordable Homes meeting Oxford's needs), SA6 ++ (Access to Services and Facilities) and SA10+/- (reducing Road Pollution and Congestion) in Tables 9.1 and 9.2.

The South ends of these sites are very dependent on the Banbury road for access. Residents commuting from here would add to traffic on the road network and increase the congestion and pollution already experienced. There is no certainty of a rapid transit system in the foreseeable future. Except for the proposed Northern Gateway it is too far from places of employment for people to walk to work and for more than a few to cycle. The North ends are close to Oxford Parkway and houses there are likely to be occupied by London commuters. The contribution to meeting Oxford's housing needs is therefore likely to be small. The SA1 rating++ is far too favourable.

Both sites are too close to major traffic arteries and would suffer from noise and air pollution, especially in outdoor spaces necessary for recreation. The impact on nearby housing of the A34, in particular in terms of noise, is something already experienced.

The development of either or both these sites would affect important views of open countryside from Cutteslowe Park and urbanise the Cherwell valley. Part of site 50 would possibly be affected by flooding from the River Cherwell.

- **Site 123 is the western part of site 38 and is included in site 50**

We disagree with the ++ ratings for SA6 and AS16. The site is not suitable for housing. It is isolated, far from shops and main routes into the city. There are not suitable opportunities for employment because access is only possible through narrow residential streets. We also disagree with

the rating under SA10 because there is no easy access except by car. The golf course is already small and developing this site would reduce it and make it unviable. It would also remove a valuable recreational facility and, just as important, an area that makes a contribution to biodiversity and provides a wild life corridor.

- **Site 122 included in site 38.**  
This site considered separately and as part of site 38 is unsuitable for housing. It is badly located bounded by the railway and the A34. Noise and air quality would be seriously damaging for residents. The problems of isolation and access are similar to those of 123.
- **Sites 125 and 178** have similar problems to sites 38 and 50 in that both are too close to major roads and would suffer from noise and air pollution, especially in spaces necessary for outdoor recreation.
- **Site 39 Frieze Farm.**  
If developed, this site would cause loss of farmland. It is surrounded by major roads on all sides and safe access for pedestrians and cyclists to schools, shops etc. is only available to the north. It favours car use.
- **Site 41 at Drinkwater including site 124.**  
These sites are surrounded by major roads to the south and west and the planned link road will cross it. There are limited public transport possibilities for access to Oxford so it favours car use and pedestrians and cyclists would have to cross major roads.
- **Site 167 is adjacent to Oxford Parkway.**  
Free-market housing here would very likely be occupied predominantly by London commuters rather than those working in Oxford. Part of the site is close to the railway and the A34. If developed together with site 50 it would just be part of urban sprawl.
- **Site 168 Loop Farm.**  
This is an isolated site with restricted access from A44 and not good for housing.
- **Site 177 Loop Farm 2.**  
A major road (A44) on the east side of the site would cause problems with sound and air pollution.

#### **TRANSPORT ASSESSMENT QUESTIONS 15 and 16.**

- The ‘green scores’ for areas A and B depend simply upon the proximity of the sites to existing roads, services and public transport. These transport services are already inadequate, the roads are congested and there are serious problems with air quality. Additional traffic growth from other imminent developments is certain to exacerbate the problems. The simple presence of roads and current services, not the responsibility of Cherwell,

cannot be accepted as a justification for the promotion of certain sites when the consequences will be experienced by people living nearby in the City of Oxford, nor can they justify Oxford City Council's acceptance of these sites to fulfil their genuine need to meet the lack of housing.

- The areas of search in the Transport Assessment usefully demonstrate very clearly the issues outlined in the bullet point above.
- It would appear that the areas of search with respect to transport links depend not upon proper planning decisions about appropriateness but upon the sites proposed by commercial interests. As we have observed before, we would expect more active input from professional planners.
- Our views about sites in the Green Belt both in respect of development and their proximity to transport routes is clear in our response to the areas of search for development sites (Question 9), see above. It is important that the Green Belt be preserved and that its enjoyment should not be compromised by poor air quality and by a serious reduction in the possibility of easy access by making access routes even more congested than they are.

## **SUSTAINABILITY -TRANSPORT**

- In response to Question 17 we would like to see the objectives in 7.40 relate not only to Cherwell, but to everyone. Of the objectives in 7.34, our concern is the consequences of Objective 17 if there is uncontrolled and unsustainable growth.
- In response to Question 18 we consider that the selection of all the sites within A & B is not appropriate. In 7.46 it states the importance of 'convenient affordable and sustainable travel opportunities'. The sustainability assessment is based on proximity to transport routes. Insufficient weighting is given to the current and future nature of these routes and the consequences of increasing the traffic.
- The problem arising by simply accepting a positive assessment for sites situated close to key transport infrastructure (7.48), no matter what that infrastructure is capable of delivering and without considering what other demands there will be on it in the period under consideration, arises again in Question 19. Some of the Green scores in Figure 10 are not acceptable.
- We doubt, for example, the green score for the modal split (column 1) for sites 38 and 50.
- The stated (but flawed) methodology in the Transport Assessment takes 'no account of the capacity implications associated with transport infrastructure – simply whether it was present or not in relation to each area of search' (6.10, page 69). However, as in Figure 10, we consider that the 'At-a-glance summary of site findings' (Transport Assessment page 75, fig.6-2), gives a misleading view of the benefits or otherwise of the areas of search. Green scores should not be assigned to sites simply because of their proximity to routes, described as 'sustainable', serving Oxford and Cherwell (Figure 10. 2 and 3). From both these summaries it would appear that the benefits of options A and B outweigh those in other options, but 'like' is not being compared with 'like' here, therefore we cannot agree with the conclusions.

- Access to jobs by walking (4) is totally impossible for any site at a distance from centres of employment.
- Access by road (5) in some cases means sites that favour car use.
- The traffic conditions on nearby roads (6) are never ‘green’, while proximity to roads is seen as an advantage in (2) and (3). This demonstrates current difficulties.
- The proximity to future transport investments (8) is speculative and optimistic. Before this can be seen as ‘green’ for any site, details of funding and a timetable for implementation related to proposed development would be needed. Schemes, even when planned (7), often take longer than predicted and do not always deliver the hoped-for results. Many local residents would cite the improvements to the Wolvercote and Cutteslowe roundabouts.
- Road safety incidents (column 9) near a site need to be taken seriously. It is important to know how many and how serious current incidents are. Sites proposed for development are sites for families from which safe access to schools etc are an absolute necessity.
- Our concerns about air quality are reflected in column 10, where few scores are ‘green’.

#### **EFFECTS OF SITE OPTIONS ON OXFORD** (Question 20)

- Oxford’s needs could be met with a smaller total of houses if the proportion of affordable houses on each site were sufficient. See our comments above under Housing Allocation with reference to the percentage of affordable housing required of developments in Cherwell and Oxford.
- The primary aim should be to satisfy current needs before growing the city.
- Growth of employment even at the already projected rate runs a serious risk of being detrimental to the historic city and to the well-being of its current inhabitants. It has to be recognized that there are geographical and social limitations to growth.
- Proximity to roads for easy access to jobs and services, as already pointed out, is not necessarily positive. It depends upon how congested the roads are. Also proximity to roads may have serious disadvantages in creating poor living conditions damaging to health. Large sites in the wrong place without local jobs and facilities increase congestion and consequent pollution.
- It is hard to see how the development of any of these sites will conserve biodiversity and protect and enhance the landscape. Without details and evidence, this score should not be ‘green’ but at best neutral, and at worst ‘red’.
- Large developments are not necessarily soulless urban extensions or sprawls. They can create vibrant independent, self-sustaining communities if they are provided with their own services and facilities not dependent on the increasingly overloaded services in Oxford. This would reduce car use and provide people with a better living environment, especially if there is good sustainable public transport, preferably by rail.

## **EVIDENCE BASE**

- One very important piece of evidence is needed: a realistic estimate of the projected increase in traffic on the effects of the health of those for whom the houses are intended and their neighbours. Recent research has repeatedly pointed out how detrimental the effects of traffic pollution on air quality are to everyone, but especially to young children and the increasingly elderly population. If this is not taken seriously the personal, local, and national financial costs will be significant.