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OXFORD CITY COUNCIL'S Local Plan Proposed Submission Document Consultation

Response from Wolvercote Neighbourhood Forum

This response is informed by the consultations and questionnaires that were part of developing the Wolvercote Neighbourhood Plan. It addresses those sections of the Local Plan of particular concern to local residents and that are considered unsound because they are not justified, effective or consistent with national policy: Spatial Strategy; Employment sites; New housing provision; Delivering affordable homes; Air quality; Green Belt; Views and building heights; and Walking, cycling, and public transport

Spatial Strategy

This strategy is unsound because there is a concentration on employment growth rather than on providing the housing that is needed within the city. This strategy is the cause of many of the problems the Local Plan's policies seek to address. It expects neighbouring areas to provide the extra housing resulting in urban sprawl in the lost Green Belt, more commuting congestion and consequent increased air pollution.

Policy E1: Employment sites

This policy is not justified because it allocates almost all current employment land in the City, some of which has been empty for a long time, for employment rather than for housing. The consequence of this is to locate most new housing outside the city. This conflicts with the claim that housing is a priority. It is also used as an unconvincing justification for there being special circumstances to release areas of Green Belt.

Policy H1: The scale of new housing provision

This policy is unsound first of all because it is based on outdated figures. The 2014 SHMA figures of 28,000 houses have been revised to 27,120 houses. More significantly, the Objectively Assessed Need

suggests that no more than 13,000 houses are required during the plan period.

The City is not planning to build sufficient houses within its boundary because it is reserving land that could be used for housing for new employment in accord with its Overall Spatial Strategy. It should also review its planning density. Increased density could provide many more houses in the City.

The consequence of this Policy and the outdated and unsound calculations on which it is based is that neighbouring areas are expected to provide the additional homes with all the adverse consequences indicated in the response to the Spatial Strategy.

It is clear from the consultations that have taken place in formulating the Wolvercote Neighbourhood Plan that there is local concern about the consequences of this policy. There is overwhelming opposition to building on the Green Belt, the creation of urban sprawl and the unnecessary diminution and effective loss of the gap between north Oxford and Kidlington

Policy H2: Delivering affordable homes

This Policy is unsound because it is unlikely to be effective.

Current policies would result in most of the unmet housing need being provided outside the city, where there is not a uniform requirement for the provision of affordable housing. This is not acceptable and unnecessary (see the comment on the number of dwellings required in the previous section).

It is clear from our consultations that wherever there are developments, developers should be required to provide 50% of the houses built as affordable. Consequently there must be an agreement that houses built in areas outside the city should also accept this. A failure to ensure this would be a failure in the duty to co-operate.

Policy RE6: Air quality

This policy is not effective.

This policy is not effective in ensuring the reduction of the currently high levels of pollution in Oxford that are injurious to health.

Policy G3: Green Belt

This policy is unsound because it is not justified, effective or consistent with national policy

In all the consultations held in developing the Neighbourhood Plan there has been very strong public support for the protection of the Green Belt. The special circumstances cited for the release of Green Belt land in this

policy do not satisfy the conditions in the revised NPPF (137-8). These require that all reasonable alternatives should have been considered. The City's 'special circumstances' depend entirely on their policy of reserving land for employment rather than reallocating some of the land for housing and for failing to review the density of development in the City. There are sites in the city that could be used instead of Green Belt land. It should also be noted that the sites to accommodate the 'unmet need' outside the city are also in the Green Belt and are similarly subject to the conditions in the NPPF.

Policy DH2: Views and building heights

This policy is unsound because it is not justified, effective or consistent with national policy.

The residents of Wolvercote are particularly concerned that a policy relating to views and building heights should be expressed robustly and enforced. The unfortunate visual impact on views, in particular from Port Meadow and on settings of international architectural importance was clear when approval was given to the Castle Mill Flats. This policy needs complete revision after wide and expert consultation to ensure that it does not narrowly address views and building heights alone, but ensures protection for the character and appearance of Oxford's historic heritage and its setting. It needs to set out very specific and detailed conditions for the approval of development in the City

Policy M1: Prioritising walking, cycling, and public transport

This policy is unsound because it is not effective.

There is considerable local support for the promotion of sustainable travel by public transport, cycling and walking. However, there should be plans for the provision of safe routes for cyclists and pedestrians that are separate and not shared. Policy M1 does not provide coordinated pedestrian links to encourage walking: the encouragement of walking is an aspiration without support. There should also be cycle routes that are separate from motor traffic.

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