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CPRE Oxfordshire response to Oxford Local Plan 2036 Preferred Options Consultation, August 2017

The response from CPRE Oxfordshire to this consultation follows below. However, we understand that, given the short consultation period which has run over the summer months, the City Council has indicated that it will accept further commentary after the consultation deadline and it is possible that we will wish to submit additional information in due course.

SUMMARY

The 2014 Oxfordshire Strategic Housing Market Assessment determined that Oxford's housing need was between 24,000 and 32,000 dwellings. Of this, 63% is for smaller more affordable housing. The draft Local Plan states at para 1.20 that *Addressing the housing issue is the number one priority of the City Council*, and at 3.13 recognises that *There is not only a shortage of homes in Oxford, but a shortage of homes that are affordable to local people*.

The City's own housing need is clearly best addressed in the City itself as to do otherwise is to create commuting and make for a less vibrant City.

Despite that, and **despite their acknowledging that housing need is the number one priority, particularly for more affordable homes, the City intends to address only a third of it within its boundaries**, pleading lack of capacity to accommodate it. The rest is off-loaded on to surrounding authorities under the Duty to Cooperate, not just creating commuting, but also exacerbating the land supply problems of those neighbouring authorities.

CPRE is opposed in principle to the release of Green Belt land - as is national planning policy. It is thus absolutely against any relaxation of the protection afforded to the Green Belt as proposed in any of the "policy approaches" set out under Option 31 of the draft Local Plan. All the policies set out under Option 31 require removal of land from Green Belt protection. These sites form an integral part of the Oxford Green Belt and these policies also need to be considered in the light of much larger incursions outside the City boundaries, proposed by neighbouring Authorities in conjunction with the City Council. Taken together, this is a major attack on the whole concept of Oxford's Green belt.

A very strong case has to be made to establish the exceptional circumstances required for the release of Green Belt land. The Oxford City Plan goes nowhere near making such a case.

- Public opinion strongly supports retention of Green Belt land as does Government Policy.

- The houses proposed for the Green Belt land should be built elsewhere in the City, either on employment land or elsewhere by marginally lifting densities on non-Green Belt sites. This would in any case be beneficial in satisfying real housing need for affordable dwellings.
- The City Council has failed to carry out a proper audit of alternative sites available in the City, in particular brownfield sites, to see what land is available for housing and/ or other needs. This in turn will lead to that land being underutilised or not utilised at all.
- The lack of such an audit has made the Council's approach that most of Oxford's population growth has to be housed on Green Belt land the easy approach.

CPRE recommendations

It is CPRE's view that all, or at least the greater part of, the City's housing need could and should be accommodated within the City on non-Green Belt land through:

- 1. Using land ring-fenced for employment to meet the greater housing priority instead** - giving land over to employment would simply exacerbate the housing problem the City claims to be its number one aim to solve.
- 2. The use of brownfield sites.**
- 3. A step increase in density targets**, to the higher end of former PPG3 guidance or above, with land release conditional on densities being accepted.

Our response is divided into the following sections:

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1. Overall Housing Target for the plan period - Option 9

CPRE remains sceptical about the growth figures which are referred to in Opt. 9 which derive from the SHMA and on which the HELAA is based.¹

One possibility is to consider a staged process, to see if the level of growth perceived in the HELAA is actually achieved, prioritising brownfield/employment land.

However, all the arguments advanced against the need to meet the full Objectively Assessed Housing Need for Oxford *within* Oxford apply just as equally to the Districts around Oxford that are being expected to pick up any shortfall ie delivery significantly above past rates, at a level that is unlikely to be achievable and that prioritises quantity over quality. Oxford can and should do more to meet its own requirements.

CPRE recommendation

The Preferred Option 9 should be far more ambitious. If appropriate policies on employment land and density were adopted, as outlined elsewhere in this submission, the City could come far closer to meeting its Objectively Assessed Need figures.

¹ See *Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs* - A critique of GL Hearn's April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) Urban & Regional Policy, May 2014 <http://www.cpreoxon.org.uk/news/item/2369-local-authorities-must-reject-shma?highlight=WyJhbGFuIiwid2VuYmFuLXNtaXRoliwiYWxhbiB3ZW5iYW4tc21pdGgiXQ==>

2. EMPLOYMENT LAND (Options 1 - 2)

Options 1-2 refer to the perceived need to preserve employment land within the City. This is based on a presumption that such land is in short supply and more will be needed for the future. CPRE believes that such land is *not* in short supply, that there is in fact a surplus already available and that with permitted developments at Northern Gateway and in the surrounding Districts, enough surplus employment and brownfield sites are available to meet Oxford's future employment requirements. This would allow the land to be used for housing sufficient that there would not be an unmet housing need, given appropriate densities.

The Council has failed to carry out a proper audit of what land is available as employment and brownfield sites and has assumed that most new housing development will have to be sited on the Green Belt, both within and outside its boundaries, for the convenience of those working in the City. That assumption is wrong. As set out below there is plenty of evidence that there is land available within the City boundaries which is suitable for housing without requiring development in the Green Belt.

The Council argues that there is a high demand for employment land, and that is no doubt the case; Oxford is as attractive a place to create new employment as it is to live. But there is no need for new employment in a City with an unemployment rate of 3.7%, compared to a National Rate of 6%, and where 86% of the economically inactive are not looking for a job. Anything less than 5% unemployment is generally considered full employment as there is natural coming and going between jobs. In that respect Oxford's employment figure is very high and stable.

CPRE have the following observations to make concerning the need for employment land:

1. The impact of student numbers on employment and housing land should be re-visited.

Oxford's likely working age population growth has been overestimated in the Local Plan. Included in the calculation of those in the working age population are students. The recent large scale increase in student numbers in the City has been included in the growth calculation as continuing at the same rate. Students are not permanent residents of the City, most are not in employment and a similar increase in their numbers is unlikely to continue. This and the nature of their temporary residence, impacts on how much employment and housing land are required.

2. The amount of employment land required should be re-calculated based on more up to date assumptions as to how modern and future office space will be used and a reduction in the amount of space needed.

3. The large number of sites which are earmarked for employment which have been vacant for lengthy periods of time (in some cases decades) should be considered for housing development or as places to move employment from other sites which are capable of residential use.

There is a need to balance two demands. The first is the possible future appearance of new unspecified job opportunities in the City which the SHMA, informed by the Oxfordshire LEP, assumes. This in turn leads to a higher housing requirement assumption as more jobs obviously "exacerbate" housing need.

The second is the need to house the people who already live and work in the City and their growing families, and the people who have jobs outside the City but desire to live in it, and whom it would be advantageous if the City housed.

Since the hypothetical jobs are not needed in the City and could readily be accommodated outside it, and the housing need arising from the resident population already exists and can only be satisfactorily accommodated within the City, then a re-assignment of land use is required.

The HELAA lists 164 hectares of employment land which, if used for housing at the low 39 dph (dwellings per hectare) average density calculated from sites wholly allocated to housing in the City, would provide a further 6,396 homes.

At the much higher “bye-law” densities we advocate in Section 3 of this document, that could be up to 12,300.

These 12,300 houses alone would also be over 80% of the “unmet need” presently allocated to neighbouring authorities.

The likely population growth of Oxford

The central premise behind the allocation of sites in the draft Oxford Plan is that Oxford is a rapidly expanding city with a rapidly expanding population and a consequent need for extra employment areas. The need for additional employment land is set out in the Oxford City Council Employment Assessment Land 2016 (the Assessment) prepared by AECOM Consultants for the purposes of preparing the Local Plan

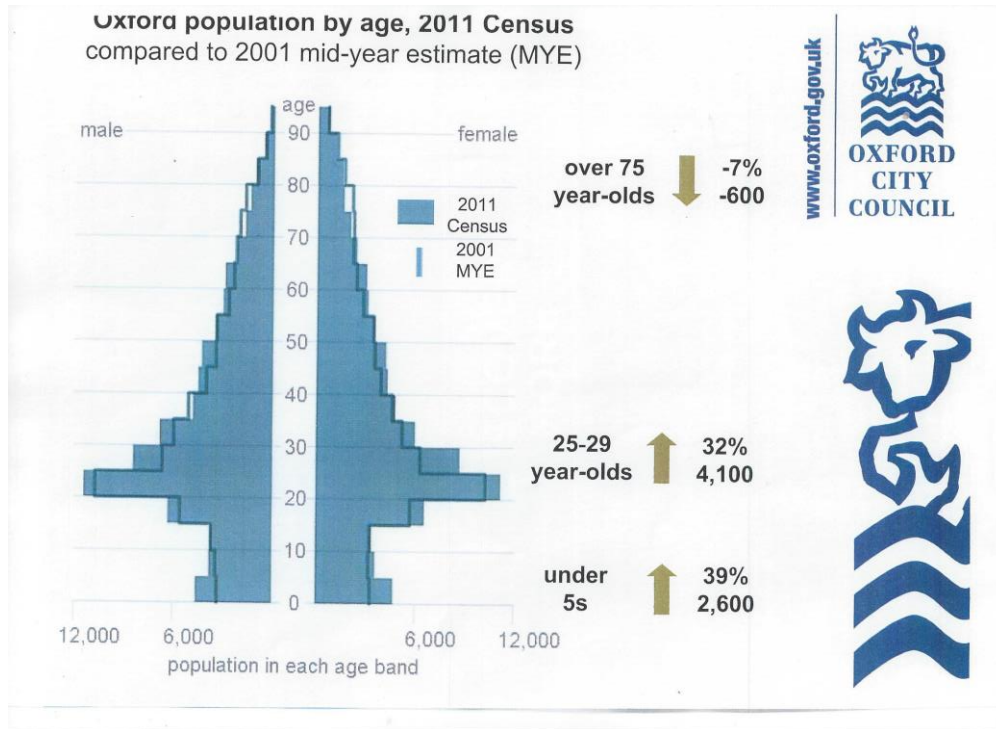
The results of the 2011 Census show that between 2001 and 2011 the population of Oxford increased by 16,400 to 151,900. What is not mentioned in either the draft Local Plan or in the 2016 Assessment is about half was due to the increase in the number of students in Oxford and in the possibly linked number of children under the age of 5 years old.

According to the review carried out by Mark Fransham, Senior Research Officer of the City Council, entitled “Findings from the 2011 census,”² the changes in the working age population by economic activity between 2001 and 2011 were as follows:

Part- time employee	2,300
Full-time employee	3,900
Self-employed	-100
Unemployed	1,500
Full Time student (economically active)	2,200
Retired	-500
Student economically inactive	4,000
Looking after home/family	-400
Long term sick/disabled	0
Other economically inactive	-300

² https://www.oxford.gov.uk/downloads/file/2178/findings_from_the_2011_census

From this table it is clear that of the increase in the working age population of 12,600, about half was made up of students living in Oxford and as such represent a considerable floating population. The bulk of Oxford's increased population is in the age range of 18 to 30. The numbers in the age range 30 to 60 have not increased to anything like the same extent, as shown on the attached chart taken from the Findings.



In other words those that study or carry out research here tend to leave Oxford after they have finished.

The population of Oxford according to the draft Local Plan is expected to grow by 36,900 people in the period 2006 -2031. On the basis of the information from the 2011 Census this figure would be made up of about 50% students and a large amount of young children. The problem with this is that there is no evidence that either of the two Universities will be expanding their student numbers to anything like this amount. In fact university applications fell this year³, which ties in with a dip in the number of those in the 17 to 18 year age range and increasing awareness of the cost of tertiary education.

The amount of employment land is calculated on out of date assumptions as to how office space is used and the reduction in the size of space allocated.

As is made clear in Para. 7.3.19, the authors of the 2016 Assessment have assumed that floor space will grow at the same compound rate as employment, ensuring that existing employment densities (the average floor space per worker) remains constant across each B use class. However, most commercial organisations are moving away from providing permanent work stations for their staff and are embracing the use of hot desks and/or

³ <http://www.bbc.co.uk/news/education-40581643>

working remotely reducing their staff space requirements. Increasing numbers of people are working flexibly and job sharing. This is particularly true of those knowledge-based businesses where there is no need to visit the office each day. This assumption in the 2016 Assessment therefore exaggerates the need for future office space. It is surprising more research was not done into this aspect of the Report as it impacts on traffic and other constraints. To put matters in perspective the increase of 105,000sqm of office space set out in the Assessment would equate to 2.8sqm for each new resident of Oxford -young and old.

There are a large number of vacant employment sites available which could be put to other uses.

Para 2.16 of the draft Local Plan states:

“The Employment Land Assessment (2016) states that the total demand for new B1 floorspace is forecast to be between 65,800 sq metres and 105,000 sq. metres. The demand for B2/B8 floorspace is between -0.1 ha and 21.9 ha. The report concludes that the demand for B1 floorspace in particular but also B2/B8 is well in excess of the current supply”.

The Assessment (Page2) states that:

“The amount of vacant land including sites awaiting development is 408,372 sqm of B1 (about 25% of the total employment land) and just 2.5 ha of B2/B8 (under 2% of B2/B8 land). However, most of the vacant land has proposals for development, including planning permission, and is expected to be built out in the short term.”

This vacant land clearly has to be included in the total available for growth and it would seem that Oxford is already oversupplied with land available for B1 development. The expectation that the land will be built on in the short term is unrealistic as the following examples show.

Examples of uncompleted sites that have been vacant for long periods.

Oxford Business Park

Attached to this section is a plan showing the available vacant sites at the Oxford Business Park. This development was originally granted permission for development in the 1990s; since when many vacant plots have stood empty as shown on the attached plan and photographs. Two of the existing buildings on site are now empty and, except for a small maintenance area, the large Royal Mail site (6.67 acres) has been empty since 2009. One of the buildings available was previously occupied by HSS Plant Hire which shows development on this site has not been restricted to B1 use, as does the existence of the Audi garage and show rooms.



Oxford Business Park

Oxford Science Park

Attached to this section is a plan showing the available vacant sites at the Oxford Science Park. The Oxford Science Park opened in 1991. However, there are still numerous sites available and the occupants of the existing buildings are not necessarily science based.

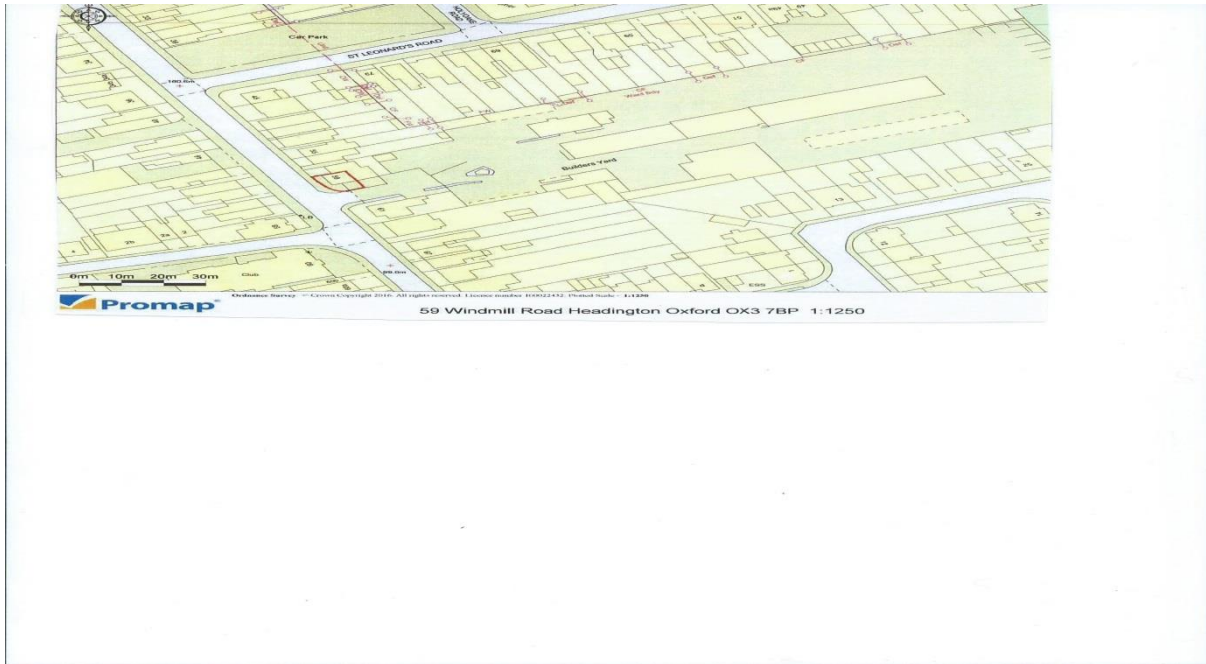


Oxford Science Park

Land adjacent to Armstrong Road, Littlemore

This substantial site was earmarked for employment land but has been vacant for many years and is covered in young woodland. In 2015 the site's status was altered for housing on the basis that alternative employment land was available at the Churchill Hospital. The central premise behind the Oxford Local Plan is that existing employment sites should be preserved. The employment sites are listed in Table 5 Sites as recommended for further investigation. It is disappointing that the Council, whilst claiming that there is a need to preserve the stock of employment land within the City, has seemingly not carried out any assessment of how much of this is currently built on or is vacant. Despite the lack of investigation the Council argues that Oxford is short of employment land and that in accordance with Options 1, 2 and 3 all current employment land should be preserved. It is claimed that certain sites should be protected because they are providing local services (Para. 2.23) but there is no explanation as to how such businesses could actually be preserved.

An example of such a site is Blanchford's Building Merchants, which is listed under employment sites for protection (Page 153). This site contains an acre of land (plan attached) which conveniently is in the middle of a residential area. What would the rationale be of refusing permission to convert such a site to residential use when there is other vacant land available at Oxford Business Park or elsewhere?



Blanchford Site

There is the further complication of two large areas being made available in the period to 2036 which are not considered in the Local Plan in terms of the potential surplus available employment land in the City which could then be made available for housing:

1. Northern Gateway

This development has planning permission for 80,000sqm of employment development.

2. Bicester Office Park

This development is adjacent to Bicester Village Station and is obviously intended to be attractive to those seeking to have offices close to Oxford and has planning permission for 46,450sqm of commercial development.

Is the Local Plan taking a realistic approach in the light of the above factors in reserving so much land for employment instead of freeing this up for other uses which are more pressing, such as providing more housing closer to the centre of the City, rather than being dispersed to the outskirts? CPRE believes the answer to this question is clearly no.

CPRE recommendations

Land set aside for employment should be prioritised for housing, which is the more urgent need that the City Council itself has identified. If built to appropriate density, this would enable Oxford City to provide a further 12,000+ houses within its own boundaries, without encroaching on neighbouring districts or the Green Belt. In this regard we would support the Rejected Options set out in relation to Options 1 and 2 with the modification that this land, if not used for employment purposes, is re-classified for housing.

3. DENSITY AND EFFICIENT USE OF LAND (Option 30)

Paragraph 47 of the NPPF requires authorities to *set out their own approach to housing density to reflect local circumstances*.

Oxford's local circumstances are self-described by the City Council as being a severe shortage of homes, and not just a shortage of homes, but of homes that are affordable by local people.

The SHMA assesses this shortage as between 24,000 and 28,000 houses over the next twenty years, two thirds of which need to be smaller one or two bedroom properties.

It is self-evident that Oxford's housing need should be accommodated within the City itself, to the greatest extent possible, as that is where the need is located. To provide housing in surrounding Districts is inappropriate and will inevitably cause more commuting.

Given that the land supply must be relatively non-elastic, the primary route to increasing housing supply within the City has to be through higher 'density to reflect local circumstances' (NPPF Para 47).

In Section 2a we have considered the merits of using land ring-fenced for employment to instead assist in relieving the severe housing need.

Although the current Local Plan consultation document is hardly transparent, it states the intention to provide between 7,000 and 8,000 houses (a third of the "need"), although where this will be accomplished is not specified.

It is assumed to be the land identified in the October 2016 HELAA, on which it was then said that 6,317 houses could be built. On top of that, 135 were assumed from small sites and 1,020 on windfall sites, totalling 7,472.

There is no easily accessible evidence as to overall housing density on mixed sites, but the 58 acres of sites which are purely for residential use, and the 2,245 houses (30% of the total) to be built on them would have an average density of 39 dph. This has been taken to be representative of the whole for the present purposes.

PPG3 encouraged *housing development which makes more efficient use of land (between 30 and 50 dwellings per hectare net)*. At 39 dph, the City would be just below mid-way on that scale. However PPG3 continued that Councils should *seek greater intensity of development at places with good public transport accessibility such as city, town, district and local centres or around major nodes along good quality public transport corridors*. (Our emphasis) The 1999 Urbed report "Tapping the Potential"⁴ quoted the density range as *from 10 d/ha (executive housing) to 25-35 d/ha, and 50-80 d/ha in central areas*.

Now highly desirable, Victorian terrace housing was typically built at 70 to the hectare.

⁴ <http://urbed.coop/projects/tapping-potential>



In *Housing for a Compact City*⁵, Lord Rogers wrote: *Even in Central London we are still building at an average density of 78 dwellings per hectare (!). This is around half the density of the Georgian terraces of Islington and Notting Hill, built 200 years ago, or of contemporary European developments shown in this book.*

In *Redefining Density 2015*⁶ for the Mayor of London, it says *Higher density is often seen as synonymous with high-rise, but this is simply not the case. Victorian terraced housing or Edwardian mansion blocks can have a higher density than modern tower blocks surrounded by empty space. And thirdly, higher density areas also deliver many benefits to local residents, by creating the critical mass to support more shops, better and more diverse local services, and improved social and transport infrastructure. It is clear that London's densest boroughs, such as Islington with a 200,000 population living at an average of 138 people per hectare, have low densities compared to other international cities such as Madrid's Centro district, with 150,000 people living at an average of 286 people per hectare. Similarly, the Haussmann boulevards of Paris give that city a much higher level of housing density than London.*

High density does not have to mean tower blocks, but highly desirable housing, well-serviced walk to work neighbourhoods and a lively community spirit.

If Oxford density was increased to the 78dph level which Lord Rogers considered inadequate, it would double the housing potential of the presently allocated land from 7,472 to 14,944.

Additionally, there are 190 hectares of new sites in the final stage of a three part evaluation process, according to the Local Plan. Assuming just half of these come forward, that could yield a further 7,410 houses.

This would be a potential Oxford capacity of:

Employment Land switched to housing	: 12,300
Increased densities on allocated housing land	: 14,944
Capacity of half land under Stage 3 examination	: 7,410

A total of 34,654 houses, over four times the Local Plan target of 7-8,000.

It is recognised that this is a simplistic argument. Site density capabilities may be greater or less than those assumed. On Lord Rogers' assessment, building highly desirable Georgian terraces would yield twice as many houses again.

⁵ <http://www.rudi.net/node/6454>

⁶ <http://londonfirst.co.uk/wp-content/uploads/2015/09/Redefining-Density-0915.pdf>

It is though a plea for the upward revision of densities to be urgently revisited, especially while sites now in the early phases of construction can be re-assessed.

The prizes would be: less traffic, less CO2, less air pollution, more walk to work, less time spent travelling, more vibrant communities, lower cost housing for local people (because land price is the key variable) and less countryside outside Oxford sacrificed to Oxford's low densities.

CPRE does not have the capacity to undertake such an exercise, but we recommend that such an exercise should be urgently undertaken by independent consultants.

CPRE recommendations

In relation to Option 30, an urgent study is needed to look into the upward revision of densities, which could help deliver a total of over 30,000 houses, as well as leading to more affordable housing, more integrated communities, less traffic and pollution, and greater protection of the countryside.

4. PROPOSED GREEN BELT SITE ALLOCATIONS (Option 31)

Summary of CPRE case

CPRE is opposed in principle to the release of Green Belt land - as is national planning policy.

A very strong case therefore has to be made to establish the exceptional circumstances required for the release of Green Belt land. The Oxford City Plan goes nowhere near making such a case.

- Public opinion strongly supports retention of Green Belt land as does Government Policy.
- The houses proposed for the Green Belt land could be built elsewhere in the City by marginally lifting densities on non-Green Belt sites. This would be beneficial in satisfying real housing need.
- Failing that they could legitimately be added to the “unmet need” allocated to other Authorities.

There are therefore no exceptional reasons to justify this proposed release of Green Belt land.

In this context, the 2017 LUC Green Belt study is fatally flawed, but is anyway premature.

Introduction

The Local Plan consultation has scant detail about the number of houses to be built, or the sites to be allocated, or the densities employed, all of which are apparently “work in progress”. This makes it hard to identify precise figures. It is evident that the purpose of the consultation is primarily to gain acceptance of assertions, rather than to provide evidence to support them. This is confirmed by the Council’s website which invites people to respond to a questionnaire on the options without reading the Plan (*We value your views on the options for the Local Plan. Please complete the short questionnaire (you do not need to read the full preferred options document to do this)*).

The question relating to proposed development in the Green Belt began with a statement *Oxford is a small city with a tightly drawn administrative boundary and a growing population. Using resources such as water, energy and land efficiently is key to ensuring Oxford's sustainable growth and development, now and in the future.*

The proposal on which you are asked to respond on an agree/disagree scale was *Preferred Option: Green Belt - Review the Green Belt within Oxford and allocate the 8 Green Belt sites shown on the map for housing. Assessment shows that these are not in the floodplain, wildlife sites or well-used, and would have a moderate or low impact on the Green Belt.*

This is a model of a loaded question, directly inferring in the preamble that there is “no option”, and providing no information on, say, the strong protection required to be given to Green Belt land, much less the availability of alternatives.

It encapsulates the City Council's line that Oxford has a housing crisis that can be met only by (a) Green Belt encroachment and (b) imposition of "unmet need" on neighbouring authorities. CPRE does not consider either leg of this assertion to have any validity. It is relevant that at the same meeting at which Scrutiny Committee were informed of this consultation they were also advised of the City Council's plan to submit an application for development of Green Belt land it owns (with other profit sharing partners) outside the City boundaries. This application's scant credibility depends on the assertions made in the Local Plan consultation.

Public Opinion

The primary duty of a Local Authority must be to the people it represents. An independent market research exercise commissioned by CPRE was conducted across Oxfordshire by Alpha Research of Thame in April 2015.⁷

In stark contrast to the loaded and incomplete question asked by the City Council in its consultation, referred to above, the key question to respondents covered both policy, and the argument made by some that the Green Belt was preventing necessary development.

Q. Green Belts are defined areas of countryside surrounding our largest towns and cities including Oxford where building of houses, out-of-town shopping centres, offices, warehouses and other kinds of development is usually not allowed. According to legislation the key reason green belts exist is to prevent urban areas spreading out across the countryside and eventually joining up. But some would argue that Green Belts are preventing necessary development from happening in the best place.

How much, if at all, do you agree or disagree that the Green Belt around Oxford should remain open and undeveloped, and building on it not allowed?

76% of respondents agreed with the proposal that the Green Belt should remain undeveloped. 66% considered housebuilding the greatest threat. Although polls have something of a tarnished reputation this has resulted from situations where marginal inaccuracy has led to incorrect forecasts in relatively marginal binary contests, for example on Brexit. Here, however, the sample was so large and the outcome so conclusive, that whilst there might be up to a 5% margin of error, this would at most marginally reduce the size of the majority, not affect the result, or its overwhelming scale.

Further, this is in line with previous polls, adding to confidence that it accurately reflects public opinion.

The same exercise showed that in Oxford itself the outcome was hardly less conclusive, with 73% of respondents supporting the proposition that the Green Belt should not be developed for housing or any other purpose. This was especially noteworthy as Oxford's residents have been particularly exposed to the ceaseless campaigning by the City Council over the past thirty years, that Oxford has "no option" but to spread on to the Green Belt if it is to provide housing for its people (a fallacious claim, as we show in our submission on densities that Oxford could accommodate more than all its claimed housing need on non-Green Belt land it acknowledges to be available for development in the City).

⁷ <http://tinyurl.com/y9cod6al>

73% of non-homeowners agreed that the Green Belt should not be developed. In other words, the people who might be expected to have been the most responsive to the City's campaigning rejected Green Belt development almost as strongly as the general population.

There can be no doubt that the people both of Oxfordshire and of Oxford itself are opposed on an informed basis to Green Belt development in principle.

Government Policy

The NPPF states that one of its Core Planning Principles (para 17) is to *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them.* (Our emphasis)

This is amplified at para 79 which states *The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.* Paragraph 83 states that *Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.* (Our emphasis)

The recent Housing White Paper, lays out the steps required before a finding of “exceptional circumstances”, *clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.* (Our emphasis)

Para 1.39 lays out some of the “reasonable options” which Local Authorities must demonstrate they have considered before there can be the “exceptional circumstances” required for review/release of Green Belt land. These include:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement.

This is of course not yet law. But the statements in the NPPF clearly show how high the hurdle for exceptional circumstances must be, given that the “fundamental aim is keeping Green Belt land permanently open”, and the need to consider “reasonable options” before considering Green Belt release is in any case implicit.

Further, the overwhelming public support for the Green Belt to be untouched, is a strong reinforcement of the over-arching need to assemble irrefutable evidence of the public need to do so before contemplating breaching it.

In fact there is little evidence that the City Council has seriously weighed reasonable options to Green Belt release and strong evidence, particularly, that it has not carefully considered the option to review its use of land and the intensity with which it uses it.

Housing Target

Although the Local Plan consultation at 1.20 claims that *Addressing the housing issue is the number one priority of the City Council*, the actual intention is to address less than half of it.

Out of the mid-case 28,000 house “need” in the SHMA - “need” in inverted commas, as CPRE does not consider this to be “need” or the figure credible, realistic, or in the best interest of residents of the County or the City itself - the City only intends to address 13,000, of which 7-8,000 would be within this plan period (the figure is left fuzzy in the consultation document).

As we argue elsewhere in our submission on density, if the City truly put the housing need first, it would not exacerbate its self-described number one priority issue by using available land to create more employment, but instead use it all for housing. That would produce a further 6,400 houses at the City’s present densities, or 12,300 at the “bye-law” densities we advocate. At the same bye-law densities, the sites allocated for housing could almost double their yield to 14,400.

Not only would this eclipse whatever number of houses is intended to be built on the 18 hectares - or elsewhere 27 hectares - of Green Belt sites (no housing numbers are given in the Plan) but it would also mean the City has land available to meet in a more sustainable fashion almost all, if not the entirety, of the unmet need it is now imposing on its neighbours.

Exceptional Circumstances

Exceptional circumstances must be evidenced before Green Belt land can be released for any purpose, including housing. Housing need is in itself not sufficient; the inability to satisfy it in any other way must be demonstrated. It should be noted that since no housing numbers are allocated to these sites, housing may not be the intended use, and indeed no use may be intended. If there is not immediately intended use, exceptional circumstances cannot exist.

The City Council lays out what it sees as “exceptional circumstances” at 1.26. *Green Belt areas in Oxford will be appraised using the formal process and tests set out by the government. Green Belt areas that do not have important public access value are not in flood plain or of biodiversity importance will be considered for development, if development on those sites could take place while the integrity and purpose of the wider Green Belt is maintained.*

Although there are Government processes and tests, the second paragraph above does not describe them. Instead it describes the opinion of the City Council and its consultants. Green Belt land cannot be released on the grounds that it has no public access, or little biodiversity, as land owners could quickly arrange for these circumstances to prevail. Nor, for that matter, is absence of flooding a reason. Further, the condition that the integrity of the Green Belt is maintained is clearly in some conflict with the statement at OPT31A which states that moderate (not even low) impact on the integrity of the Green Belt is considered acceptable.

1.26 continues *The City Council considers that exceptional circumstances exist to justify a Green Belt boundary review due to the need to support Oxford's economic success and its dependence on the delivery of additional housing to meet housing need.*

These are not exceptional circumstances. It would first have to be established that economic success was at risk, was dependent on additional housing and that neither could be achieved without releasing Green Belt land. This would require, as indeed 1.26 acknowledges, “the formal process and tests set out by the Government”. ONLY if these formal tests and processes demonstrate that no alternative is available can exceptional circumstances be considered to potentially exist. This would need to be followed by a formal review as to whether the exceptional circumstances outweighed the harm inevitable in Green Belt release.

These are the sequential tests as published in the Government's White Paper:

a. Determine capacity of Brownfield land

20 hectares of brownfield land is listed in the Previously Developed Land annex for “further investigation”. This is itself more than the 18 hectares of Green Belt land proposed to be released. To meet the Government test it would have to be shown that these brownfield sites could not accommodate at least the number of houses now allocated to Green Belt. It has not been shown, nor has any attempt been made to demonstrate it, other than saying that a review of these sites is planned.

b. Determine capacity of Surplus Public Sector land

Surplus Public Sector land is included within the “Sites recommended for further investigation” and amounts to 75 hectares. Even if only half of this was eventually determined to be buildable, it would still be twice as large an area as the Green Belt land proposed for release.

As with the previously developed sites, this is also work in progress.

c. Determine ability to increase density on (non-Green Belt) sites.

Paragraph 47 of the NPPF requires authorities *set out their own approach to housing density to reflect local circumstances.*

The local circumstances are described in 3.13 of the Plan as being *there is not only a shortage of homes in Oxford, but a shortage of homes that are affordable to local people.* (Our emphasis)

Assuming, for lack of hard evidence, that the average density of build intended would be the 39 to the hectare applying to wholly residential sites in the SHLAA that would mean that just 702 of the roughly 7,500 houses would be built on the Green Belt land intended to be released.

Looking at that another way, the contribution from the Green Belt sites could be replaced by an increase in density of just 10% on the non-Green Belt sites, say from 39 to 43 per hectare.

This is both achievable and desirable. 43 houses per hectare is only the mid-point of the old PPG3 density targets, of 35-55. Attractive ‘bye-law housing’ would typically be built at 70

to the hectare or more. Oxford is a City and itself contains very desirable bye-law housing, such as that in Jericho, which was typically built at 70 to the hectare or more. Urban, high end targets should apply.

That would mean capacity on non-Green Belt sites would not only increase to accommodate the modest number of houses possibly intended for Green Belt locations; but that - because higher density will typically mean smaller and more affordable homes - the houses will be more affordable to local people. (See CPRE Density Paper)⁸.

d. Explore Capacity of Neighbouring Authorities

Neighbouring Authorities have already agreed to take 15,000 houses on behalf of the City. It is not unreasonable to expect that they could also accommodate the 720 houses planned for Green Belt sites in the City, which would increase the unmet need burden by only 3.5%. There is however no indication that they have been asked.

To have failed all of these tests, as we submit the City Council has done, means that exceptional circumstances could not exist, and its argument for Green Belt review could not hold water.

The Green Belt study

The findings of the 2017 LUC study of nominated Green Belt sites - those the City Council had ALREADY decided could be released - are irrelevant until the tests of exceptional circumstances described above have been met. Only then is it appropriate to consider the level of harm in removing a particular Green Belt site against which the claimed need to do so must be balanced.

Twelve selected sites were assessed covering 140 hectares (11%) of the City's Green Belt. At 1.8 the LUC study states that *the aim of the study was to assess the suitability of the potential sites being promoted for development against the five purposes of the Green Belt and to identify the relative harm (or otherwise) to the Green Belt that may result from their potential release for development.* (Our emphasis)

In CPRE's view a process of in effect comparing the "performance" of one Green Belt site against another, and then assuming that the lowest scoring site is developable, is fatally and obviously flawed as repetition of the process would inevitably end with every Green Belt site but one released.

Sites were assessed to rate their performance against the five Green Belt purposes, excluding the fifth, of encouraging the re-use of land, which it was accepted was fulfilled by all sites in the Green Belt equally.

For the purpose of assessing each parcel's contribution to containing sprawl, the authors examined various definitions of sprawl and selected one that risked the merger of settlements. Amongst the many flaws with that assumption are that merger of settlements is a separate purpose from containing sprawl; and that sprawl is a condition in itself, whether it threatens merger or not.

⁸ <http://www.cpreoxon.org.uk/news/current-news/item/2535-how-densely-should-we-build?highlight=WyJkZW5zaXR5Il0=>

In the case of Oxford, which is unique in having a Green Belt which runs through the City as well as surrounding it, any point at which the built up area extends into the Green Belt must constitute urban sprawl. These may be small incursions, but they are incursions none the less and once made are at risk of growing.

Even though however they had confined themselves to assessing sprawl on the basis of merger of settlements they failed to identify that the site at St Frideswide Farm would not only risk the merger of settlements at the 'Kidlington Gap', the narrowest in the whole Green Belt, but that development intended for St Frideswide Farm by the City Council was refused by the Inspector in 2012 on exactly that basis.

That may be because they had decided to consider only large built up areas as settlements, or on a literal interpretation of the NPPF which refers only to the merger of neighbouring towns, whereas Kidlington is statutorily a village.

It is some village though, being at the 2011 Census larger than the towns of Thame or Henley. Its separation from Oxford is only a few fields wide and is threatened not just by Oxford's Local Plan at St Frideswide's, but by Cherwell District Council whose Part 1 review currently in progress threatens the 'Gap' from the North.

CPRE does not consider that the LUC Study should be given weight, not just because of its apparently selective nature, but because it is premature.

Whether or not a site is considered to make a greater or lesser contribution to the Green Belt is not a reason in itself for reviewing it. First the need has to be shown through exceptional circumstances. Only then can the inevitable harm from releasing any Green Belt land be weighed against the benefit.

Since no exceptional circumstances are evidenced, there can be no justification for any review of Green Belt land.

CPRE recommendations

The City has made no case for development on its Green Belt land; development which its own electorate are known to strongly resist. The Government's emerging guidelines have not been followed and no exceptional circumstances have been claimed, or exist. The Green Belt sites must be deleted from the Plan.

Option 31: CPRE therefore supports Rejected Option D - Do not allocate Green Belt sites for housing.

5. Student Accommodation

Opt 20: Linking the delivery of new University academic facilities to the delivery of University provided residential accommodation.

It is our understanding that the Preferred Option will *not* decrease the number of students living out. This is because it appears thousands of full-time post graduate research students have been taken out of the threshold and will be permitted to live in private sector housing, adding pressure to the market.

CPRE recommendation - Option 20

CPRE supports alternative option B.

6.Light Pollution and Dark Skies (Option 46)

The coverage of light pollution in the draft Local Plan is far too weak. The cumulative impact of the amount of development proposed will be very large if measures are not taken BOTH to keep new pollution to a minimum AND reduce existing light spill.

The key recommendations of CPRE's nationwide study on Dark Skies Shedding Light (2014)⁹ should be considered:

- *Policies to control light pollution should include identifying existing dark areas that need protecting.*
- *A strong presumption against new lighting in existing dark areas, unless essential as part of a new development or for public safety reasons that have been clearly demonstrated.*
- *Street lighting policy to include Environmental Lighting Zones to ensure that the appropriate lighting levels with very strict requirements applying in identified dark areas.*
- *Adoption of part-night lighting schemes (e.g. switching off between midnight and 5am) or dimming*
- *Careful consideration (in conjunction with Highways authorities) to the type of Light Emitting Diodes (LED) lighting allowed and the potential impacts that higher temperature blue rich lighting has on ecology and on human health.*
- *Targets (in conjunction with Highways authorities) for replacing all their street and road lights with less light polluting types*
- *Testing in situ of any new street lighting before being rolled out across a wider area*
- *Adopt monitoring procedures that include collaboration with the Institution of Lighting Professionals/LANTERNS research project which aims to quantify any effects of changes to street lighting on road traffic accidents and crime.*

This should inform the development of a much more thorough dark skies policy. This is important not just in terms of local nuisance, but quality of life of all Oxford's residents and neighbours; for recreation and amenity (especially in respect of Oxford's Dark Sky Discovery Site, South Park); for wildlife; and for the character and setting of Oxford's heritage assets and areas for which light pollution was NOT a characteristic historically.

For example, the recently adopted Bath and North East Somerset Placemaking Plan Part 1, paragraphs 200-208, including Policy D8 (pp 75-7), is an example of a more explicit, technically proactive approach which was found to be sound for another authority that covers part of the Cotswolds AONB (and Mendips AONB) and has a World Heritage Site. (See http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/pmp_vol_1_dw_strategy_and_policies_composite.pdf).

CPRE recommendation

An additional Dark Skies policy is required. We would be very happy to work with the City Council to share information and best practice in this area.

⁹ <http://www.cpre.org.uk/resources/countryside/dark-skies/item/3608-shedding-light>

7. GREEN SPACES (Options 49, 50-53 & 56)

Although Oxford is a city with plenty of green spaces, many of these are private, such as College and University Playing Fields, to which the public has little or no access. In order to formulate a plan to deal with this problem, the City published its “Oxford Green Spaces Strategy 2013-2027”, to which CPRE contributed. Although this was an extensive investigation into the need for Green Space in the City, the Council has chosen to ignore what was proposed in its own strategy and has rejected this as an option. Instead it puts forward Preferred Option A, whereby it does not seek any overall target for the total quantity of public open space across the city. In one stroke it has written off the vast amount of work that went into its own Strategy.

Examples of objectives contained in the Strategy which could and should be included in the Preferred Options are:

Objective 01

Maintain the total hectares of unrestricted open space at 785 ha and seek opportunities to increase this.

Objective 04

Improve local access to green space. Our aspiration is that people do not have to walk more than 1,900 metres to the nearest large park, not more than 750 metres to the nearest medium park and not more than 400 metres to their nearest small park. This standard will be applied to their nearest small park. This standard will be applied to all new developments, as well as to existing residential developments.

CPRE recommendation - Option 49

The Rejected option B should be adopted, maintaining the existing policy in the Core Strategy which links green spaces to population (5.75 ha per 1,000 population).

CPRE welcomes the policy section on Green Infrastructure.

However, it would be significantly strengthened by mentioning the huge contribution that green spaces and water courses make to Oxford’s heritage. There is a deep relationship between Oxford’s green spaces and its built environment and archaeology which is fundamental to the City’s historic character. Similarly, there should be a recognition of how the exceptional wildlife (believed to be the highest density of Sites of Special Scientific Interest for any district in England) is part and parcel of this historic character and its patina.

Option 50 (Creating a green infrastructure policy designation) - the Preferred Option A+B is supported. We have some concerns that it does not provide sufficient protection for large Green Infrastructure areas such as Cutteslowe and Sunnymead Park. The Preferred Options should be adapted to clarify protection for large areas of Green Infrastructure which might otherwise be at risk of being scaled down and developed.

Option 52 (existing green spaces) - it is especially important that these should be related to heritage assets and settings (several being in Conservation Areas, designated as Registered Parks or Gardens, or in the case of Port Meadow a scheduled ancient monument; others being historic urban parks and cemeteries, many with designated heritage assets; others crucial designated college gardens, many accessible for private visits / open days and visiting academics and many of which are fundamental to the character of the Conservation Areas.

Option 53 creating green spaces is of great importance for development affecting the settings of historic assets where their setting can be enhanced by well-designed green space.

Option 56 on watercourses fails to recognise their very substantial historical importance, including numerous listed structures (eg canal, locks) and contribution to the character and appearance of several Conservation Areas and the setting of some of Oxford's most important buildings (as illustrated by the full page photo of St Georges Tower - p86), monuments (Port Meadow, Rewley Abbey wall) and Registered Parks and Gardens like Magdalen, St Catherines, University Parks, Christchurch and Botanic Gardens.

A serious omission from this section is that no mention is made of light pollution or of the Oxford Dark Sky Discovery Site (South Park) which is well used for star gazing events - a far more proactive approach to reducing existing light pollution and promoting dark skies is needed. (See earlier response relating to Option 46, Light Pollution.)

CPRE recommendation - Options 50-53 & 56

These policies should be strengthened by making much greater reference to the huge contribution that green spaces and water courses make to Oxford's heritage, relating them to both heritage assets and settings.

Protection for larger areas of green infrastructure should be clarified.

The Oxford Dark Sky Discovery Site (South Park) should also be referenced.

8. HERITAGE, SETTINGS & VIEWS (especially in relation to Taller Buildings) (Opt. 61 - 78)

Ironically, while the section entitled Enhancing Oxford's Unique Heritage and Creating Quality New Development and the Objectives listed in para 6.1 promises an integrated approach, the policy options fall a very long way short. They reinforce an out-of-date siloed approach to issues that has served the City badly in the relatively recent past and shows that the lessons have not been learned. In particular the Options show no understanding of the deeply interrelated nature of these issues and their fundamental role in determining Oxford's unique, internationally important character as a major historic place.

Option 62A and Options 63A-C are bland pieces of planning-speak that could apply to any other city town or village anywhere in the UK. They should stress the fundamental importance of Oxford's historic character and relationship to wildlife and green spaces and what it is about these that sets Oxford apart from other places.

These Options should be entirely rethought and rewritten to encompass a genuinely holistic approach that both recognises the many complex interacting factors that contribute to Oxford's historic character, including overlaps with other policy areas, and the special weight that relevant designations bear.

Tall Buildings and Views

The **preferred Option 71** to do away with the current view cones and height policy and replace it with a more flexible, less restrictive policy only concerning high buildings is **fundamentally flawed**.

First, the views that have hitherto been protected have many other aesthetic landscape and other characteristics that do not involve tall buildings. Restricting the policy in this way would greatly diminish their value. There are no ideas of proactively managing those views so that they remain open or can be restored.

Second, and even more fundamentally, the Council's continued reliance on 'views' as a policy instrument perpetuates the 1960s emphasis on a few key views, not a 21st century appreciation of the 'setting' of heritage assets, nor any real basis of understanding how people enjoy views of and across Oxford. Whilst 'views' are clearly important, they are NOT a statutory consideration in planning considerations. By contrast, the setting of listed buildings and the character and appearance of conservation areas (which includes the relationship with their surroundings) ARE statutory considerations, and the National Planning Policy Framework (NPPF) has extended the 'great weight' that applies to them to all designated heritage assets.

Furthermore, 'views' are only one aspect of 'setting' as defined by NPPF and NPPG and explained by Historic England's guidance. It is also noteworthy that Historic England has decided to withdraw their separate guidance on views as being too confusing and restricted in terms of what views and the surroundings of historic place contribute to their historic significance.

We would recommend the Council considers the Bath & North East Somerset Council World Heritage Site Setting Supplementary Planning Document. This is a study based on settings, not just views, and zones the City to show how heights should be restricted so as not to harm understanding of historic character and setting, including topographic context.¹⁰

This views-led approach to defining options is fundamentally flawed: by separating views, tall buildings and heritage assets the City Council is once again cementing old, outdated and inadequate constructs that were at the root of the Castle Mill debacle. Instead, it should recognise that the more important the heritage asset (Oxford is full of them), the more likely it is that it will be issues of setting that are at stake, not physical fabric. For that reason, conserving and enhancing the setting of heritage assets, especially those of the highest importance, is often even more important than small changes to their fabric. The courts have made it clear that whatever the grade of asset and whatever scale the impact is, preserving the setting of designated heritage assets carries special weight and importance. These policies fail to reflect this.

Once this is properly recognised, the following quickly become apparent:

1. Many of Oxford's green spaces actually ARE heritage assets in their own right (at least in central Oxford, but locally important elsewhere too) AND contribute to the setting of its heritage assets.
2. Oxford's protected views are important because they represent some of the key points where the heritage significance of the buildings and their juxtaposition can be appreciated - but also contribute to people's appreciation of the Green Belt and its purpose to protect the setting of Oxford.
3. Views out from and across Oxford's heritage buildings open to the public - and many others from roof top restaurants and cafes and colleges visited by thousands of students and visiting academics - are at least as important as the protected views inwards revealing the complexities of historical, architectural, aesthetic, visual, landscape and townscape interrelationships between heritage assets of many different kinds, the setting of each contributing to the significance of others.
4. Many other views and physical features that are not protected further contribute to people's understanding and appreciation of Oxford's heritage assets, and this is no less part of their setting and due special regard and great weight.

Over the years Oxford City Council has developed separate policies towards views, and tall buildings separate from its heritage policies that have had the effect of mistakenly divorcing them from issues of setting. This was disastrous in the case of Castle Mill where only views policy was applied. The subsequent Roger Dudman Way Review recommended that the relationship between views setting and tall buildings should be clarified, but this has never been done - even in drawing up the current Preferred Options.

In Para 14 of the NPPF the presumption in favour of development based on objectively assessed needs (both in plan-making and determining applications) is heavily qualified as NOT applying where "specific policies in this Framework indicate development should be restricted" which is referenced to apply specifically to "sites protected under the Birds and Habitats Directives .. and/or designated as Sites of

¹⁰ See:

<http://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/supplementary-planning-documents-spds> - [World Heritage Site Setting \(City of Bath\) Supplementary Planning Document](#) August 2013

Special Scientific Interest; land designated as Green Belt, Local Green Space;... **designated heritage assets**; and locations at risk of flooding” (Our emphasis)

Para 65 of the National Planning Policy Framework states:

‘Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (**unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting** which is not outweighed by the proposal’s economic, social and environmental benefits).’ [Our emphasis] As the City Council options study notes, para 132 makes it clear that this balance is not just to be tipped one way or the other: it must be ‘clear and convincing’. (Our emphasis)

The Roger Dudman Way Review, 2013,¹¹ para 215 states:

“In terms of planning policies the Review has already identified the need to strengthen the policy approach to protecting the setting of the City and its design policy. There is also a difference between the way policies are interpreted and the expectations of the wider community in Oxford. There is also a need to consider the implications of the 1990 Act (refer paragraph 161-164) and a clearer and more explicit approach to determining departures from the plan. Wider concern has been raised about the commitment to the existing heritage policies and the need to bring forward the Heritage Strategy. There is much in hand but it is important that it is integrated into the assessment process and not treated just as a specialist area.”

There is thus a fundamental problem with the City’s approach which continues to be far too reliant on an outmoded policy structure. First developed as an approach to protecting views which at the time was innovative, it is now far too simplistic, and has if anything been reinforced rather than reformed by more recent work: neither the Landscape Setting study nor the Views Study has adopted an approach based on current approaches to heritage setting. There now needs to be a thorough-going fresh start (with fresh eyes) to define what contributes to Oxford’s setting; to the setting of the multiple high grade historic buildings that form its skyline; and what encapsulates the character and appearance of its Conservation Areas (CAs) that have not yet been appraised. This is especially true for the central CA for which it is scandalous that there is still no CA Appraisal.

It is essential both that a proper understanding is brought to bear on all the factors that contribute to these settings, not just views, including how and by whom the settings of these interlocking assets are (in the words of NPPF’s definition of setting) ‘understood and appreciated’. For example, the vast majority of visitors to Oxford do NOT go out to the locations from which protected views are seen but pay good money to go up one or more of the key heritage assets in central Oxford, from which wonderful views of the skyline and the backdrop of hills can be appreciated from in amongst the towers and spires, from which all sorts of historical and architectural interrelationships which contribute to their setting can far better be appreciated.

It is well established that Tall Buildings can - and in the past have had serious negative effects on Oxford’s heritage, whether viewed from outside the City looking in; looking across Oxford from one side to the other; looking out from elevated view points within the City or views from within the city. Conversely, the removal of tall buildings, notably the

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<http://mycouncil.oxford.gov.uk/documents/s16562/RDW%20INDEPENDENT%20REVIEW%20FINAL%20REPORT%20140107%2017th%20Jan.pdf>

biochemistry tower, has been highly beneficial. More rarely, tall buildings make a positive contribution to the City's heritage (eg the minaret of the Islamic Centre in Marston Road).

The original View Cones Study, whilst welcome, is insufficient as the basis for a new policy on taller buildings as it does nothing to link views to setting issues and has nothing on views out of the City. Even if views out were added, views alone still don't equate to what the concept of setting embraces.

The criteria that need to be established are those set out in Historic England's setting guidance.¹²

As yet there is no adequate study to act as the basis of a criteria-based tall buildings setting policy to replace the Carfax Height rule of thumb. Like protected view cones, this is an ancient policy that long predates the more sophisticated understanding of setting that now exists, and there has been a tendency to build up to the height as if it were an automatic high tide line. Nonetheless, it has been largely effective in protecting the setting of historic tall buildings (but less so for the character of conservation areas at ground level).

While this is also now outdated, replacing it with the equally aged View Cones approach would be LESS effective because it would just reinforce the Council's restricted out-of-date approach to the principles of preserving and enhancing heritage settings on the basis of the contribution they make to historic, architectural, aesthetic and cultural significance, which was demonstrated by the Castle Mill case and the lessons that have not been learnt or recommendations implemented.

To develop an appropriate policy requires a completely fresh consideration of setting issues as indicated above, recognising that while a few modern 'tall' buildings have made a positive contribution, several others have not (and ideally should be removed or made less obtrusive).

The **preferred Option 70A** thus reveals the City Council's blind spot with regard to recognising the scale and complexity of City-wide setting issues. It is utterly inadequate, potentially opening floodgates to high buildings based only on visual criteria, not how they will affect the setting of all the constituent heritage assets that they impinge upon. The policy approach proposed is **NOT in accordance with NPPF para 14 quoted above, nor would it meet the requirement of para 154 that plan policies should "provide a clear indication of how a decision maker should react to a development proposals"**.

Related to this, the **preferred Option 66A for 'building heights'** suffers from the same problem. The Castle Mill case illustrates how tallish buildings in the wrong place can be highly damaging - including how it and other tallish buildings in the vicinity of the railway and canal have cumulatively encroached into the visibility of green wooded hillsides that form the backdrop to so many views from within the City. Here again heritage setting issues need to be identified as a primary concern that must be given great weight, and given the density and complex inter-relationship and scale of Oxford's heritage settings, this will very commonly need to be considered. Where setting issues are not affected there remain the good design issues referred to in the Option 66A.

This again is a general flaw in the good design part of this Section: **Good Design Option 65A** should stress that where setting, character or appearance of Conservation Areas or Listed

¹² The Setting of Heritage Assets, Historic England, March 2015
<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

Buildings are affected, good design is key to achieve the statutory requirement to have special regard to preserving their setting and preserving and/or enhancing their historic character or appearance. The same applies to the great weight to be applied to any other heritage designation affected.

But more than this, NPPF makes it abundantly clear that the historic environment permeates areas and must be taken into account: there is nothing here about using historic character assessments to help guide design.

Altering Existing Buildings Option 67A should again cross-refer to the special considerations that arise in relation to designated heritage assets and also Green Belt. In particular, explicit reference should be made to using Article 4 restrictions to limit permitted development rights where recent changes have allowed major extensions potentially doubling the size of dwellings, including merely to set a precedent for then replacing them to that scale, contrary to heritage and green belt policies.

The options to retain specific policies on Listed Buildings and Conservation Areas is welcome, but gives no idea of how they will be made Oxford specific.

For **Option 71A** the existing local plan policies helpfully reflect some of the key characteristics that are important in decision making in Oxford - including aspects that typically arise in cases of setting, which, had they been properly applied, might have prevented the Castle Mill debacle. **The principle that they should be informative and as per NPPF para 154 “provide a clear indication of how a decision maker should react to a development proposal” should apply again, but with greater emphasis on the variety and great importance of Oxford’s buildings.**

For **Option 72A** the policy on Conservation Areas **should explain the range of different characteristics, what they contribute to the variety of heritage and the sort of features and relationships that are important. The policy should explicitly include the swift completion of any outstanding CA appraisals** and refer to these as key considerations, whilst the policy on undesignated assets should set out the considerations to be adopted in considering new CAs. The policy will also need to set out the basis of how Article 4 Directions will be used to restrict permitted development that could harm the character of CAs.

Preferred Option 72A on undesignated assets is welcome, but it makes no reference to general historic character issues although the Council has been developing historic characterisations as part of its Heritage Strategy. A very clear indication should be included to show how such characterisations will be used, especially where in effect they provide the underlying unity between designated and undesignated assets and areas.

Preferred Options 74A and 75A, proposing to do away with specific policies on Registered Parks and Gardens and Scheduled Monuments **are utterly inappropriate:** this would provide nothing to indicate how decision-makers will approach this and given the complexity of overlapping heritage and others issues would NOT meet the requirement of NPPF 154. In places with very few or very isolated examples this might be acceptable, but in Oxford of all places this does not apply.

Central Oxford has one of the densest areas of RPGs anywhere in England - only comparable with Cambridge. Most of these are fundamental to the setting of Grade I Listed Buildings and are hugely important for the character of Conservation Areas. Here again clarity is needed as to how such considerations will be taken into account.

Oxford's Scheduled Monuments are highly diverse and all have very special relationships to other heritage and/or wildlife designations, where clarity is needed. NPPF makes it very clear that where other monuments are of national importance (but often for practical reasons not yet considered for scheduling, or considered but for management reasons not included) the same principles of decision-making should apply. **Oxford is one of very few places in England where a start has been made on identifying nationally important sites that are not scheduled, and this alone makes it highly desirable that there should be a policy on Scheduled Monuments and other nationally important archaeological remains and monuments.**

Archaeology - the **preferred Options 76 and 77 are essentially sound**, but the issues of national importance - the central archaeological area was in effect a recognition of this along with 6 other historic towns in England - should be cross referred to a policy on Scheduled Ancient Monuments.

The **preferred Option 78 (NOT to have a policy on recording in historic buildings) is short sighted**: while Oxford is fortunate in having conservation officers and an archaeological officer who work well together, this does rely heavily on good coordination in dealing with cases; perhaps more importantly, having a policy on this should alert developers to the likelihood that they will need to make allowance for this. In particular, under NPPF policy and the Listed Buildings and Conservation Areas regulations, specific requirements arise in relation to the information that needs to be presented so that the need for recording can be judged.

CPRE recommendations

- Great weight should be given to heritage settings issues, in line with the findings of the Roger Dudman Way Review into Castle Mill and Historic England's guidance on setting.
- Much greater consideration should be given to 'views out' of the City which are at least as important as 'views in'.
- The high level options in relation to Oxford's character should be re-drafted so that they say something about Oxford, not just general aspirations that might apply anywhere.
- The Options under 'Creating [high] quality new development' should be properly integrated with and/or cross-refer to heritage policies to which they often have special relevance.
- The Options under Heritage and Settings, Tall Buildings, Building Heights, Views and Green Spaces must be properly integrated. There needs to be a radical rethink starting from the point that all of these Option areas concern the setting of Oxford's internationally important heritage assets which are a major statutory consideration, and for which a co-ordinated, integrated approach is needed to ensure that decision-makers statutory duties are fully reflected. Policies concerning green spaces, views and tall buildings should all be subsumed into an overarching policy on the Setting of Oxford's Heritage.
- The more specific heritage settings aspect should also include policies concerning the setting of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens, noting in particular the complex inter-relationships that these assets contribute to the significance of each other.
- In line with the City Heritage Plan should be a policy concerning the management of Oxford's historic landscape and townscape character.
- There should be a policy to complete the Heritage Plan as a matter of urgency (only the archaeology and historic characterisation sections are complete), and to add a proper review of Oxford's complex setting issues and their management.

9. Ensuring efficient movement into and around the city (Options 79-84)

Although the Local Plan consultation sets out in a little detail the transport problems affecting Oxford it is very short of any practical ideas as to how these can be addressed. Besides re-opening the Cowley Branch Line to the public, there is nothing new suggested and it seems likely from the growth promoted that both traffic and congestion will increase, with consequent increase in air pollution and its impact on public health.

As far as we are aware, there is currently no funding for the re-opening of the Cowley Branch line. Given the reduction in funding for railways seen in the cancellation of the electrification of the Great Western line past Swindon, it seems unlikely that funding will become available. In any event, this funding should be secured *before* development decisions are taken based on successful delivery of the Cowley railway.

Although the Plan sets out that there will be more public transport provided: the sad fact is that travel by bus is nationally declining and that outside Oxford many rural bus routes have been scrapped as a result of the ending of funding by the County Council. In Option 85 it is claimed that Oxford has an excellent existing level of public transport provision. Many would challenge that contention. For example, there is no direct bus links to many important employment sites from the Park and Rides around Oxford or from the stations.

Without some workable solutions to the transport issues affecting Oxford it would seem foolhardy to press on with the sort of unrestricted growth proposed to Oxford.

Options 80 & 81

CPRE supports the Preferred Options 80 & 81.

However, we would wish to see included the following Policies from the old Local Plan incorporated in the current Plan as objectives (acknowledging that some may have already been achieved):

POLICY TR.5 - PEDESTRIAN AND CYCLE ROUTES

The City Council will support and, where appropriate, implement measures that create more direct, safe and secure pedestrian and cycle routes.

The City Council will seek improvements along highway routes, particularly along the following corridors:

- 1. B4495 (Donnington Bridge Road, Hollow Way, The Slade, Windmill Road, Headley Way and Marston Ferry Road);**
- 2. B480 (Cowley Road to Watlington Road);**
- 3. A4158 (Iffley Road to Sandford Road); and**
- 4. Barns Road and Blackbird Leys Road.**

The City Council will seek to improve links towards the City centre including from:

- e. North Oxford: from Walton Well Road along the railway and canal corridor;**
- f. Marston: between Marston Road and St Cross Road;**

- g. Headington: between Marston Road and Longwall Street;**
- h. Barton: between North Way and Pullens Lane;**
- i. Risinghurst: between Downside Road and Windmill Road;**
- j. Temple Cowley: between Cowley Road and Meadow Lane;**
- k. East Oxford: between Jackdaw Lane and Abingdon Road via a new bridge**

over the River Thames; and

- l. West Oxford: along land south of Botley Road.**

The City Council will seek to improve links to key destinations including: **m. Marston Road with Marston Ferry Road via Rippington Drive;**

- n. Boulton's Lane with Copse Lane;**

- o. the Ring Road cycle track with Meaden Hill;**

- p. Roosevelt Drive with Bartlemas Close;**

- q. the Ring Road cycle track with Masons Road;**

- r. the Ring Road cycle track with and through the Oxford Business Park North; s. Sandy Lane West with and through the Oxford Business Park South; and**

- t. Blackbird Leys with Armstrong Road.**

The City Council will seek to secure the following new pedestrian and/or cycle links: **u. Saxon Way to the John Radcliffe Hospital;**

- v. Gardiner Street to the Nuffield Orthopaedic Centre; and**

- w. Peat Moors to the Churchill Hospital.**

Where appropriate, the City Council will seek contributions towards, or the provision of, new or more attractive pedestrian and cycle routes and facilities which will be secured by planning conditions or a planning obligation.

The improved links described in points e. to w. above are shown on the Proposals Map.

POLICY SR.10 - CREATION OF FOOTPATHS AND BRIDLEWAYS

The Proposals Map indicates new footpath links that the City Council will seek to create. These are:

- a. a footpath network in the Cherwell Valley;**

- b. a circular footpath in Iffley Fields, from Meadow Lane along the riverside;**

- c. a link between Cheney Lane, Headington Road and Headley Way/Hadow Road (precise route to be determined);**

- d. links along the northern bank of the River Isis, including a footpath link between Astons Eyot and Christ Church Meadow;**

- e. across Osney Lock;**

- f. a bridge over the River Isis on land south of Oxpens Road, with links to Paradise Street and St. Thomas Street;**

- g. from Botley Road to Binsey Village and from Binsey Church to Godstow Lock and towards Wytham (precise route to be determined);**

h. from Wood Farm to Shotover via a new footbridge over the Eastern Bypass;

i. from Godstow Road to Pixey Mead, through the site of the former Wolvercote Paper Mill;

j. from the Devil's Backbone to Ferry Hinksey Road (part of which might be located in the Vale of White Horse);

k. a bridge over the railway line to provide a link between Grandpont Park and Hinksey Stream.

Where appropriate, contributions towards the creation of these routes will be secured through a planning obligation.

In addition, CPRE would like to propose the following cycle/footpath improvements are incorporated within the Plan:

- 1) A pedestrian/cycle crossing (? subway) of A40 from Stoke Place (Oxford BR56) to Oxford FP57 through Barton West.
- 2) A footbridge across Bayswater Brook from right-angle bend on Elsfield FP11 south of Elsfield to brook-side footpath planned as part of Barton West development.
- 3) A footbridge across River Cherwell to link Oxford FP47 to Old Marston FP14 by Victoria Arms (site of old Marston Ferry).
- 4) A pedestrian/cycle link from Monks Causeway (Oxford FP16) near Osney Mead along so-called 'Electricity Road' to Devil's Backbone (South Hinksey FP1) near South Hinksey.
- 5) A footpath from Rivermead Road, Rose Hill under Southern Bypass bridge over Thames to Heyford Hill Lane, Sandford.
- 6) A footpath from near the Trout, Wolvercote under A34 to Pixey Mead.
- 7) Additional footpaths on Southfield Golf Course along golfers' paths or the edges of fairways where they would not interfere with play.