

Head of Public Protection & Development Management
Cherwell District Council
Bodicote House, Bodicote
Banbury
Oxon
OX15 4AA

DATE
PlanningPolicyConsultation@cherwell-dc.gov.uk

**Ref : CPRE Cherwell South District response to Cherwell Local Plan 2011 - 2031 (Part 1)
Partial Review, Oxford's Unmet Housing Need.**

Executive Summary

CPRE Cherwell South District object to the basic premise of this proposal as Oxford City have not provided proof, via an EiP that there is an 'unmet need' and so this review of the Cherwell Local Plan Part 1 is premature.

Assuming that an inspector finds there is an unmet need for Oxford City housing requirement then CPRE Cherwell South District have serious concerns regarding the proposal to place the majority of Cherwell's allocated housing in the Green Belt. Various government ministers have repeatedly assured the public and reinforced the wording of the NPPF Section 9 in statements that the Green Belt is to be protected. Whilst the NPPF does allow for reviews of the Green Belt, paragraph 87 of the NPPF makes it quite clear that:

"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

Paragraph 88 goes further in stating:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Paragraph 89 even reinforces this by stating *"a local planning authority should regard the construction of new buildings as inappropriate in Green Belt"*.

They then list a series of bullet points to identify these exceptions but none of these include such a massive housing proposal as that proposed by Cherwell District Council in this Review!

Amongst the five main purposes of the Green Belt listed in the NPPF under paragraph 80, which Cherwell include in their documentation, is *"to check the unrestricted sprawl of large built up areas"* and *"to preserve the setting and special character of historic towns"* such as Oxford City.

We submit that this proposal is in direct contradiction with all parts of the NPPF and government ministers' statements.

The 2014 SHMA determined that Oxford's housing need was between 24,000 and 32,000 dwellings. Of this, 63% is for smaller more affordable housing. The government has in the last few months agreed with CPRE that the calculations for the SHMA are some 40% too high. CPRE Cherwell South District would now expect Oxford City to revise their SHMA to be in agreement with the new government process prior to submitting their then revised plan to the government inspector, and for Cherwell DC to argue that Oxford City should do this before deciding where to allocate housing.

The draft Oxford City Local Plan states at paragraph 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*". They then allocate valuable, potential housing, land to employment that could be placed in other areas such as Bicester.

The City's own housing need is clearly best addressed in the City itself as to do otherwise is to create even more 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.

On page 17 of the CDC Proposed Submission Plan, Page 17, there is a definition of the requirement of "*A Duty to Cooperate*". This states, "*Local Authorities are required to 'engage constructively, actively and on an on-going basis'*". When this requirement is assessed against how CDC has carried out its "*duty*", we find a number of anomalies. To engage on an "*on-going*" basis, should suggest CDC questions the City SHMA in the light of the government statement to reduce the SHMA but this doesn't seem to have happened. CDC do not appear to have been constructive in their discussions as otherwise they would have indicated, as objectors have done, that the CITY has not allocated the land in a logical manner. Adding more employment to a crowded city and then expecting the new employees to have to live outside the city in dormitory estates just creates problems with the already over subscribed transport infrastructure.

The CDC proposed submission plan, on page 16, quotes from the NPPF requirements and under point 4 has the statement:

"4. To work together to meet development requirements which cannot wholly be met within their own areas, for instance because of lack of physical capacity or because to do so would cause significant harm to national principles and policies".

It has to be apparent that Oxford City and CDC have not "*worked together*" as if they had, CDC would not have produced this plan that "***would cause significant harm to national principles and policies***"; the plan contravenes the NPPF regarding the Green Belt and recent government statements.

The Summary Booklet poses a series of questions, which we will attempt to answer.

Page 6 Your Vision for meeting Oxford' unmet housing need in Cherwell:

To the question, “Do you support this vision?” The answer from CPRE Cherwell South District is definitely NO.

The first line suggests the plan “.. *meets Oxford’s agreed, identified housing needs ..*”. How can Cherwell agree to an unidentified Oxford housing need until that ‘housing need’ is proved by an EiP for the Oxford Plan? Whilst you might agree with the SHMA for Oxford, you have not taken into account or apparently argued with Oxford City Council about their plans to locate their apparent housing need locations.

The whole premise from Oxford City is to “ring fence” areas of their land that is available for development to even more employment. This would mean that the desperate need for housing within the City boundary would not be met. This failure would entail those who currently work in the City but cannot find suitable housing to take up something on one of the massive estates proposed by CDC in the Green Belt. They would then add to the already congested transport infrastructure in contradiction with both the CDC and the City prime aims to promote walking and cycling.

Item iv suggests the proposed housing estates in the Green Belt will be “*supported by necessary infrastructure*” but this is not technically feasible as the area is already heavily congested.

Item vi suggests these massive housing estates in the Green Belt would “*contribute to improving health and well being*” but we submit that adding to the already congested and polluted transport system and destroying part of the Green Belt unnecessarily would be bad for health of these residents who are supposed to work in congested Oxford City.

Item vii has to be a cynical comment as destroying the Green Belt is hardly conducive to “*conserving and enhancing the natural environment*”! The suggestion that a few supposed “*wildlife sites*” might be incorporated into the massive housing estates is just not practical as “*wildlife*” is unlikely to inhabit these manicured areas.

Page 7 asks whether we support the strategic objectives?

We disagree with the objectives SO16 and SO17 for the reasons stated above.

Objective SO18 is unlikely to achieve the ‘affordable’ homes at the densities on the housing estates suggested. The developers will want to build four and five bedroom houses to maximise their profit, taking unnecessary hectares of land in the process. By increasing the density of the proposed housing it is quite practical to reduce the proposed land take in the Green Belt considerably. In fact, if Oxford City used higher densities of their housing, there is not an unmet need at all!

Objective SO19 we object to as this presumes the plan is required in spite of a more sensible approach to the issues as described above. The County Transport ‘Plan’ is nothing more than a list of issues and would have to change to take these proposed district developments into account, assuming they are approved through an EiP. The area from Kidlington, Begbroke and Yarnton through Pear Tree roundabout, Woodstock Road roundabout and Banbury Road Roundabouts is already beyond full capacity and with no land available to either increase the size of the roads or add new roads the proposal would bring this area of Oxfordshire to a standstill. The rail system is also at capacity and we submit there is no availability to add any new stations on this major line. Suggesting that the A44 could have one lane closed for a bus lane would create major traffic issues along its whole length to and beyond Woodstock.

Page 10 asks whether we agree with the rejected options?

The answer is not that simple. It is interesting to note that one of the reasons given is that the sites would increase commuting to Oxford, less well situated for Oxford, would not provide the money that might be available for transport, etc. All of these reasons also apply to the proposed developments in the Green Belt although, admittedly, are a bit nearer. What seems to have been forgotten in this range of options is the employment aspect for Oxford City. There is little point in taking valuable housing land within Oxford City for employment, then expecting the employees for the proposed employment to commute from the massive housing estates in the Green Belt along with all those already commuting into Oxford. What is more sensible is to place these employment requirements in areas already allocated for them such as at Bicester, where we were promised the very high tech, university spin off industries for the already allocated employment sites. Bicester also has the housing in the CDC plan for these industries.

Page 11 We agree with the Options A and B.

We find it interesting that the reasons listed are all ones we agree with but not for the locations suggested. Each reason describes why Oxford City needs to allocate its available land for housing at a reasonably high density rather than use it for employment. The list of bullet points we agree are applicable to Oxford City but not to the proposed massive housing developments in the Green Belt!

The proposed development will require extensive new transport infrastructure whereas this is much less within the City.

The proposed development is too far out of the City to make the statement that if built it would reduce reliance on the private motor vehicle.

The deliverability of sustainable transport improvements is easier within the City. There would be no need for any improvement if the employment were located in Bicester, for example.

The relationship of existing communities to Oxford will be destroyed, as Begbroke, Yarnton and Kidlington would be combined into an urban sprawl joined to north Oxford. This 'coalescence' is in direct conflict with the policies in the CDC approved Local Plan!

Whilst there is the opportunity to provide affordable homes in the proposal, this is unlikely to happen at the densities suggested. The developers will not wish to build affordable homes as they would reduce their profits. If the density is increased then there is more opportunity to build affordable homes and the land take from the Green Belt would be substantially reduced. The last part of that bullet point sentence is correct in stating that the proposed homes need to be "*close to the source of that need*"; that is within the Oxford City limits.

Page 14 asks whether we agree with the proposed sites. We do not agree with these sites for the reasons stated above.

Policies PR1 to 13 would not achieve the housing requirements for Oxford City but they would destroy parts of the Green Belt for no practical reason. For example, policy PR3 does not provide "exceptional" reasons to take the Green Belt for development. Policy 4a identifies one of the problems with this proposal in that it would require unnecessary massive investment in some kind of infrastructure. Policy PR12b seems to suggest that further sites might be put forward?

Page 16 Policy PR6a & b is just wrong. This area of the town is already traffic and pollution blackspot and proposing even more development can only make this worse. The proposed Northern Gateway will add to the problems. Including the term 'wildlife corridors' in these proposals just shows the lack of knowledge as to how wildlife works.

Page 19 Policy PR6c suggests moving the golf course to this site; the question has to be asked, why? It is in the Green Belt.

Page 24 This proposal coalesces the villages of Yarnton, Begbroke and Kidlington into an urban sprawl from Oxford in direct contravention of the CDC's own approved Local Plan. One of the major reasons for the Green Belt is to prevent this and it is NOT an exceptional reason that it is a likely place to build housing!

Page 30 You ask whether we agree the reasons to take land out of the Green Belt. The answer has to be NO.

First bullet point, Oxford has not proved it has an '*urgent and pressing housing need*' that cannot be resolved by a better plan for the City.

The second bullet point, the only '*clear inability for Oxford to fully meet its own needs*' is that they wish to use valuable land for employment plus they have not been realistic about their density calculations. The only clear inability is that Oxford has taken the easy option of dumping their problem on the district councils.

Third bullet point is also not true if Oxford had been more realistic about its land use. Regarding the Oxford plan to use valuable land for employment, when they could put this employment in Bicester shows a lack of forethought or cooperation with the CDC.

Fourth bullet point correctly identifies the relationships between existing communities but fails to state that the Green Belt has been there to protect them from coalescence with each other and with Oxford City.

The fifth bullet point shows a complete disregard for the current green spaces and locations of the villages. Just because a mass infill might be possible isn't a reason to remove the Green Belt that currently protects them from such an infill.

Sixth bullet point correctly identifies the unique place of the Green Belt area but fails to state that this also a reason to protect it with a Green Belt, not infill with development.

Eighth bullet point suggests that the need for improvements to the current transport infrastructure issues is a reason to take areas of Green Belt land for development. There is no connection between these two issues.

Ninth bullet point suggests that taking land out of the Green Belt will improve the centre of Kidlington. If Kidlington centre requires transport improvement today then it is not a reason for taking land out of the Green Belt in the surrounding area.

Tenth bullet list the reasons FOR the Green Belt, not how small pockets of bits of land within the proposed massive development might appease people about the loss of the real openness of the countryside currently protected by the Green belt.

Eleventh bullet point nicely sums up why Green Belt should NOT be taken as the description of a joined up vision of development for the whole area from Oxford through Kidlington and the A44 corridor is why the Green Belt was established to prevent this.

Page 31 suggests that by keeping on taking little bits of the Green Belt it doesn't matter. The diagram shows how close to taking a complete slot out of the Green Belt this proposal is. This is the wrong way to protect the Green Belt as nibbling away all the time will reduce it to unconnected bits of land that can no longer be called a Green BELT. Perhaps this is in reality the long term plan for the County?

In conclusion, we find the proposed review to be UNSOUND.

Yours sincerely

John L Broad

Chairman,

Cherwell South District, CPRE

Copies to: Bruce Tremayne; Helen Marshall, CPRE Director