

## Draft Oxford Local Plan 2040

Public Consultation December – January 2023

Statement from New Marston (South) Residents' Association

December 2023

The Association gave a statement to Oxford City Council at the Preferred Options stage of plan preparation (late in 2022). The Association explained in that 2022 statement that its decision **not** to follow the 'tick- box' options offered by the consultation was because it could not fit its comments into pre-determined responses. The Association feels much the same about the current public consultation. It appears to be 'fishing' for support for the Council's local plan policies, rather than seeking out the detail of local public opinion about current environmental issues and required policies in New Marston.

We understand that this stage of public consultation is part of a nationally / legally defined process and that the Council is seeking to show the government and the Planning Inspectorate that it has conformed with legal requirements and has 'properly' sought public comment on the 'soundness' of the draft plan.

In the Association's statement at Preferred Options stage last year we noted the mismatch between overall planning policies and the day-to-day operation of the planning system in Marston through the operation of development control. The Association's view arises from the approval of the expansion of Clive Booth Student Village causing damage to Headington Hill Conservation Area, damage to the green infrastructure of the city, breaching View Cones policy and using spurious data to argue for dubious gain of private rented accommodation due to the expansion of new purpose-built student accommodation. A very low rate of current student occupancy of private rental housing was used by the Council to inflate the number of family houses that could be released when new student accommodation was occupied.

### E1: support residential development on employment sites

The Association welcomes the intention in the draft Local Plan to open currently Local Plan designated employment sites for housing development.

### R2: support and consider sound

The Association welcomes the intention to enforce higher thermal insulation standards in new housing developments and to address the issue of embodied carbon when demolition of existing buildings is being considered. The Association raised those latter issues as matters of concern in its statement at the Preferred Options stage of public consultation last year. It is pleased to see them now being brought forward into policy.

### Policies map: unsound

The Association has serious concern at the re-drawing of the flood plain boundaries in Oxford following the Council's own analysis, particularly changes to the boundary of zone 3b (the functional flood plain). We see from the interactive policies map on the Council website that the extent of zone 3b on the eastern side of the River Cherwell running through New Marston Meadows has been **reduced**. The new outline of zone 3b appears

**not** to include areas locally known to be subject to frequent flooding. At a time of climate crisis with more intense and longer periods of extreme weather / rainfall any reduction of the extent of the functional flood is very risky. We consider the draft Local Plan is 'unsound' in this respect.

C1: unsound

The Association's **main concern** with draft Local Plan 2040 is the principle of “15 minute neighbourhood” which has become a main element of the Local Plan .

Although Marston is now designated in the draft Local Plan as a 'local centre' the area lacks many basic facilities:

- There is no GP surgery in or near Marston. The nearest doctors' surgeries are in Headington and Summertown.
- There is no NHS dental practice in Marston. The nearest are at Brookes, Summertown or city centre.
- There is no large supermarket / general store in Marston. The nearest are found in district centres (Headington, Summertown and Cowley Road / Cowley centre)
- There are limited leisure facilities in Marston, including swimming. The nearest facilities are in Summertown and Barton.

Although the Association welcomes the 15-minute concept, in principle, it cannot see how the City Council can consider Marston as a local centre unless current / existing facilities are upgraded. That aim would require substantial new infrastructure and private sector investment. The Association believes that Marston today has fewer of the 'local' facilities used in the Local Plan to define a 'local centre' than the other designated local areas in the Plan. The Association considers that Marston does **not** merit the designation as a local centre given the current lack of key functions. On the other hand, the Association agrees that north-east Oxford needs a fully endowed local centre. At present that is not the case. The Association believes that local centre designation here will raise local expectations for improvements which the Council cannot guarantee nor have the powers to implement. Does this render the Local Plan unsound? We ask how Oxford City Council will deal with the lack of local facilities in Marston?

Policy MRORAOF: unsound

Indeed, the problem of lack of service provision / facilities in Marston is being further undermined by the pursuit of other local public policies. For example, Oxfordshire County Council is pursuing a Traffic Filter scheme to place restrictions on car travel through Marston Ferry Road, St. Clements and Hollow Way. We believe that these traffic restrictions will make Marston residents even less able to access much needed local facilities in future. There are currently no direct bus services from Marston to Headington, Summertown or Cowley district centres. Bus services in Marston have noticeably worsened in the past year by the withdrawal of no. 13 service. The X3 service is unreliable with longer passenger waiting times. There is no direct bus service from Marston to Oxford rail station.

C1: unsound

In summary, NM(S)RA believes that Marston (and adjacent parts of north east Oxford) are already less 'equal' than other 'local' communities in Oxford with respect to meeting the 15-minute neighbourhood designation. Currently anticipated and evolving local traffic / transportation policies in Oxford will only exacerbate the inequality. There is even less likelihood of achieving the 15-minute idea in Marston when proposed local authority traffic / transport policies are implemented.

Policy MRORAOF: unsound

Finally, the Association reiterates one of its main environmental concerns over several decades, which is the public health hazard of sewage flooding onto roads and footpaths in New Marston. The Council and Thames Water Utilities are well aware of the frequent overflow of sewers at Ferry Road and elsewhere in the locality. New development elsewhere adds to foul sewage spills in New Marston. Substantial infrastructure investment is required. This hazard is not properly recognised or policies of its resolution shown in the Plan.

New Marston (South) Residents' Association.