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Cherwell Development Watch Alliance (CDWA) is an alliance of the Begbroke & Yarnton Green Belt Campaign; GreenWayOxon; Harbord Road Area Residents' Association; Kidlington Development Watch; and the Woodstock Action Group.

Comment on Paragraph 8.3 of Oxford Local Plan 2040 Preferred Options

Para 8.3 states:

“New Development across the city results in additional community and transport infrastructure needs. It is important that there are sufficient facilities to meet the needs of existing and future residents. The Infrastructure Delivery Plan (“IDP”) was produced to support development of the Oxford Local Plan 2036 and an addendum has been produced as part of the evidence base to support the Regulation 18 Preferred Option Local Plan 2040 “

Para. 2.32 of the IDP states:

“The Employment Land Assessment (2018) looked at a whole range of employment sites across the city and assessed them against criteria including access and location, quality of buildings and environment, neighbourliness and others. The ELA forecast that between 2016 and 2036 there is a need for 72,150 m^2 additional employment floorspace; total projected demand for B1 A/B/C floorspace of 62,450 m^2 and projected demand for B2/B8 floorspace of 8,700 m^2 ”

However, in the Oxford Local Plan 2036 those figures were increased as follows

Para. 2.1. states that the ELA forecast is that, between 2016 and 2036, there is a need for 135,004 m^2 of additional floorspace.

- Total projected demand for new B1A/B/C floorspace of 113,535 m^2
- Projected demand for B2/B8 floorspace of 21, 470 m^2

In the evidence base for the Preferred Options is an Oxford City Employment Assessment Interim Report dated 22 September 2022; this has been prepared for them by Lichfields. Lichfields specialise in obtaining planning permissions for large land owners. This is the addendum referred to in Para. 8.3. As set out above the Report relies heavily on the work carried out by Cambridge Econometrics for the preparation of the draft Oxfordshire Plan 2050, based on the Oxfordshire Growth Needs Assessment (OGNA) reports they prepared. For example, In relation to Future Employment Space Requirements their report states:

4.1 This section considers future economic growth needs in Oxford by drawing on a number of scenarios that reflect different methodologies. These scenarios are used to inform the potential economic growth needs within the City and consequently the future employment land requirements and the planning policy implications that flow from these over the Local Plan period from 2020 to 2040. 4.2 As noted in section 1.0, the Interim ELNA draws upon the economic forecasts produced by Cambridge Econometrics as part of the OGNA 2021 which represent the latest available economic forecast at the time of writing. However, it is anticipated that future evidence work will be informed by more up-to-date forecasts once available. 4.3 Due to the unique nature of Oxford's economy, it is likely that sectors such as Education and Health that do not typically take place in employment land have an important role in the demand and supply of employment space in the city. This role will be examined in detail in further evidence that will support the preparation of the Local Plan.

The problem with the work carried out by Cambridge Econometrics (CE) which is found in the OGNA reports was that it not clear what assumptions had been made in preparing their various projections on employment growth (Note: they were never forecasts!). The Future Oxfordshire Partnership for whom this work was commissioned (to be part of the Oxfordshire Plan 2050) agreed at a meeting on 13 June 2022 that further work was needed by CE to ensure that those projections are realistic and understandable. It was clear at that meeting that the original projections that had been produced by CE were out of date since then there had been a war in the Ukraine and an economic crisis experienced as a result. These factors alone had undermined the growth potential of the UK which of course directly impacts that of Oxford City. That further work by CE has not been undertaken and in the light of the disengagement by various Councils from the draft Oxfordshire Plan 2050 is unlikely now.

Later at a meeting on the 20 September 2022, the Future Oxfordshire Partnership Scrutiny Committee decided that they would not rely on the OGNA reports as part of the evidence for the Oxfordshire Plan 2050.

In the circumstances the Lichfields report should not form any part of the evidence base for the 2040 Local Plan since it is clear that their assessments are based on the incomplete, and now out of date work carried out by CE.

Oxford City Council knows all this as a member of the Panel and it is very misleading of them to describe the projections prepared by CE as part of the evidence base for 2040 Oxford Plan - they are nothing of the sort.

Commercial Property in Oxford

On 3 November 2022, a search on Realia web site, which gives details of commercial properties available to lease, shows there is a large number of B1 properties available. Taking the largest 20 the total floor area available is 26,000 m² in Oxford. There appears to be little evidence of a shortage of available B1 floorspace. Lichfields has not commented on this which is a feature of the post Covid world where many more people work fully or part of the time from home and thus demand for office space has diminished.

There are four large areas of land in Oxford designated as Employment Protection sites which are suitable for further development, these are:

1. Oxford Business Park.
2. Oxford Science Park.
3. Osney Mead
4. Oxford North

Oxford Business Park

The Oxford Business Park was granted planning permission for its development in the 1990's. The site was laid out by 2000. Due to the length of time, it has taken for the Business Park to take off some of the older buildings have become empty and in need of renovation/redevelopment. However, the major problem with the site is the large amount of land that has not been developed at all and still lies empty. The total area of the Park is 88 acres and currently 12 acres remains to be developed. The fact that this site still has so many empty spaces is at odds with the conclusions in the Lichfields report that there is a shortage of land in the city for such development. No explanation is provided by Lichfields as to why there is, after so many years, empty space on the Business Park and on which very little has been built in the past 5 years. CDWA in their submissions to the Inspectors in relation to the 2036 Local Plan drew attention to this site and those following as being Employment sites which were unused despite the Council claiming there was a shortage of such land.

The Oxford Science Park

This large site has been in the process of being developed for the past 20 years and still has plenty of space. Again, no explanation is provided by Lichfields as to why this site remains only partly filled. No recent development has taken place there since the 2036 Plan was approved in 2020 although there have recently been two applications for new laboratories.

Osney Mead

Originally developed in the 1970's much of this site is in desperate need of redevelopment. Various plans have been produced by Oxford City Council since 2000 for a comprehensive redevelopment of the site but there have been no tangible results. The latest 2022 plan will probably be the same. It would be helpful if Lichfields in their report had given some explanation as to why this very central site still sits largely empty and what is preventing this and the neighbouring Oxpens site from being properly utilised.

Oxford North

Although this site has had planning permission for some years and the infrastructure work is currently progressing, there is no news of any organization wishing to move there. There are plans for new homes to be built there by the side of the Oxford Canal but no new commercial buildings proposals seem to be coming forward, which is surprising as the infrastructure will all be in place within the next 6 months in the main area.

Summary

In the light of the above and the fact that so little construction of commercial offices has taken place since 2016, the start of the Oxford 2036 Local Plan, the assessment of the future need for new employment space was grossly exaggerated in that Plan and needs revising downwards. The fact that there is currently so much vacant existing commercial space available confirms this.

It is clear that some presently protected employment land could be redesignated for residential use without any impact on the space available. Two candidates for redesignation are Osney Mead and Oxpens. Osney Mead because it has sat vacant/partly-used for so long, and Oxpens particularly as it was in earlier previous plans designated for residential use.

Policy H3

Residential space

Besides the exaggeration of the need for additional employment space, the need for additional residential land is also exaggerated as these projections again derive from the work carried out by Cambridge Econometrics, based on their employment projections. The fact is that the construction of the housing on current sites is slow and there is no indication that these sites will be filled quickly or that large scale additional sites particularly in the Green Belt are required. We do not need stalled half-filled development sites around Oxford.

Barton Park

This is the largest housing project in the Oxford area and will, when completed, be a new district of the city. The site is scheduled to take place in four phases. Work started in 2015 and the only phase to be completed is Phase 1. Phase 2 and 4 (about 30% of the site in area) have not yet started although planning permission was obtained in August 2022. Phase 3 is being undertaken by Redrow and has been partially built along the North side of the site adjacent to Barton Brook but the much larger area close to the A40 is far from completion. Altogether over half of Phase 3 has not been built on.

Developers will only build new homes if they are confident that they will sell reasonably quickly. The fact that the development of this site is moving at such a slow rate is the strongest evidence that demand is not as strong as the commercial agents retained by land owners would argue.

Oxford City Council claims that the numbers of those on the Housing Register shows that there is a demand for new housing which can only be satisfied by the allocation of new sites some of which it seems will be built in the Green Belt. The fact is that those on the Housing Register would not be in a position to buy a property on the Barton Park or even to afford to rent an “affordable” home. A one bedroomed flat cost £285,000 in 2019. What they require is social housing.

The numbers of such new social homes are in very short supply in Oxford as they require a large subsidy from outside organisations to build and, with Government cuts, even less will be constructed. Despite the fact that Barton Park was part-owned by Oxford City Council the impact on those seeking properties at truly affordable level of rent will be negligible. The large number of people on the Housing Register is primarily a measure of the scale of poverty particularly affecting families. Oxford City Council should stop using the housing register as evidence for the need to build new houses unless those developments include a sizeable amount of social housing which realistically in most cases they will not.

Policy H3 suggests that the current 50 % affordable allocation of housing would remain but of this allocation 25% would be First Homes, 70% Social rented and 5% intermediate. This is a tacit admission that the old Policy H2 (delivering affordable homes) has failed to provide truly affordable homes. However, it is unlikely that commercial developers will wish to propose developments with such a high level of such housing and also neighbouring authorities will have different policies. It is unlikely to be viable in almost all cases.

Photograph of Barton Park: Phases 2 and 4

