

Oxford City Green Party's response to the Oxford Local Plan 2040 preferred submission

January 2024

Chapter 1 - vision & strategy

Summary - response to overall vision of the Oxford Local Plan 2040

We believe the Oxford Local Plan 2040 Proposed Submission presents an improvement upon the current local plan. We strongly support the strengthened policies on net zero buildings and biodiversity, and the overlying vision for a city where residents have access to their daily needs within an easy walking distance of their homes. These policies will make Oxford greener and more resilient.

Yet to tackle the urgent crises we face in Oxford today, we need to go even further than what has been proposed here. Welcome changes have been made since earlier consultation stages, but policies that are ambitious in themselves are undermined by provisions for “exceptional circumstances” and a viability policy (S4) that will put some of the most crucial policies at risk.

We know that Oxford is the most unaffordable city in the UK, with too many households struggling to make ends meet. We must provide more genuinely affordable housing, particularly for social rent, which helps those most in need of housing support. We would like to see a higher requirement for the overall delivery of social housing, though we support the decision to remove First Homes from the affordable housing mix in Oxford. This social housing must be provided in sustainable locations, with strong public transport provision, infrastructure to allow residents to walk and cycle in safety, and green spaces that support quality of life. Affordable and social housing must be built to the same strong net zero standards as all other homes. Creating well-insulated, climate-resilient homes is even more vital for those likely to be on the front line of the instability created by climate breakdown.

We are concerned about the level of development planned for Oxford in the plan period. We have supported the decision to set a higher level of housing need than calculated via the standard method because, given nationally set viability policies, we recognise that it would be very challenging to provide the level of affordable housing Oxford needs under the standard method. Despite this, we do have significant concerns about the pressure that this level of new development will put upon the city and we do not believe that all of these issues are adequately addressed in the plan. It will be vital for developers to make major contributions to road, active travel and public transport infrastructure in particular, and the council must work with the county to ensure that there is sufficient capacity in local schools and NHS services. We also note that there is little consideration given in this document to the pressure new development will put on Oxford's water resources, which are already under considerable strain. We want to make clear that we support the higher level of housing need only because of the desperate need for affordable housing, particularly social rent. We do worry that the higher target will push growth in the city beyond sustainable levels, only increasing housing need by creating more jobs (in a time when generally Oxford has a very high employment rate) rather than helping to meet housing need.

In order to deliver this level of development in a sustainable way, we would encourage denser developments in Oxford, to make best use of the precious land we have. This will allow us to meet housing needs without building on green spaces, as well as limiting the amount of housing we are asking neighbouring councils to provide on our behalf. It is well documented that gentle density offers the most climate-proof approach as well, once again demonstrating that social and environmental goals are deeply entwined. Buildings should be taller where appropriate and we should keep an open mind about adding to Oxford's skyline in order to meet the city's needs. Tall buildings do not have to be an eyesore, done well they can complement our historic dreaming spires. We also need to think more about providing co-housing and other communal living spaces, as these are significantly more space efficient and are an attractive option for many.

Our primary concern with this plan is that, across policies, it provides too many "get-outs" for developers. We recognise that this is in part due to UK government policies on viability, over which the Council has no power. In particular, the requirement for standardised land value costs to be included in viability assessments undermines policies on affordable housing provision and environmental measures, even when a developer already owns the land or the land has been sold at a low price. However, there are also far too many other areas where the recommended policies in this document provide developers with wriggle room to avoid following policies that would likely impact their profit margins. We would like to see these loopholes closed, as much as possible. We have made more detailed comments about our concerns with policy S4 below.

Policy specific responses

S4: We recognise that the proposed viability cascade is an attempt to protect affordable housing, particularly social rent homes, from the nationally mandated viability policy. However, it remains disappointing that important policies on net zero buildings and low parking developments are at risk due to this, and we would like to note our broader opposition to the national viability policy, which allows developers to avoid providing absolutely vital facilities for our city on the basis of their profit margins. In particular, we are not convinced that the low parking policies should make developments meaningfully less viable in a city like Oxford, so are disappointed to see it identified as a policy which needs to be included in the viability cascade of policy S4.

Chapter 2 - a healthy inclusive city to live in

General comments

We have set out our response to the housing need figure in our comments on chapter 1.

We would like to see a policy on key worker housing, not just employer-linked housing, which is not mentioned in this local plan. We also note the absence of any policy encouraging co-housing, which is more space efficient and generally encourages more sustainable modes of living.

Policy specific responses

H1: *Housing requirement*

We support this policy but would like to note that the Council should do all it can to meet its own housing need. In particular, we would like to see local plan policies encouraging denser developments which make the most of Oxford's space, as well as offering the most climate-proof homes. This may mean building taller in some parts of the city, having respect for the city's existing skyline, but also considering how new higher buildings may complement the historic "dreaming spires". We would also like to highlight the important role the district councils will play in negotiating with the Council on how they help Oxford to meet its housing need, whilst also addressing the needs of their own residents.

H2: Delivering affordable homes

We support the decision to exclude First Homes from the mandated affordable housing provision, as we agree that it cannot deliver genuinely affordable homes in Oxford, given the inflated price of housing in the city. However, we are disappointed to see that only 40% of homes on sites over 10 or more homes (or equivalent) must be affordable, when in the current local plan and policy, the minimum is set at 50%. This has been justified due to increases in the cost of house building, but this presupposes that these wider economic factors will not change at all in the coming years. We are also disappointed to see an increased proportion of affordable homes (from 5% to 20%) being set aside for intermediate forms of housing including shared ownership, when instead, these could be made available for social rent. We do not believe shared ownership or affordable rent are accessible, or that they are desirable to significant numbers of residents. As a result, it is unfortunate to see that this plan sets out less ambitious targets than the last, both in terms of the proportion of affordable housing and overall proportion of units put aside for social rent in every new development.

Meanwhile we note that through the cascade system, developers are already afforded significant flexibility when tasked with meeting these targets. Based on their own assessments, developers are able to make the case that the proportions set out in policy are not financially viable. We believe this provides loopholes that can be exploited by developers and therefore, there is a need for such assessments to be independently verified.

H5: Employer-linked affordable housing

We are pleased this policy now specifies the sites on which employer-linked housing can be delivered, alleviating concerns that this policy may be used as a way to avoid providing any genuine affordable housing.

H6: Mix of dwelling sizes (number of bedrooms)

There should be a criteria for a mix of dwelling sizes across all sites, including homes for market sale rather than just the affordable housing element. We would also like to see a requirement on larger sites for all housing to be tenure blind.

H9: Location of new student accommodation

As well as the locations listed in the policy, we support student accommodation being provided on arterial roads. These locations are generally sustainable for public transport and active travel, and these busier locations can be more suitable for young people than families. Students can also be very beneficial for local shops on arterial roads, as demonstrated by Iffley and Cowley Roads in East Oxford.

H10: Linking new academic facilities with the adequate provision of student accommodation

We would like to see this expanded to include the language schools, as well as the universities, given the expansion of these schools in recent years.

H11: Homes for travelling communities

If the expected assessment of need for this type of site demonstrates that a site in Oxford is needed, we would encourage the council to find space for this within the city's boundaries. This should be discussed with surrounding districts, taking into account that those wishing to live in Oxford may currently be using sites in the districts instead.

Policy H12: Homes for boat dwellers

Many people wish to live on Oxford's waterways, for both cultural and affordability reasons. These are sensible guidelines for the provision of new moorings and we encourage the council to continue its work with other agencies to find space for additional moorings.

H14 Self-Build & Custom housebuilding

We would like to see more sites for self-build come forward that are larger, as most are small which often limits options for those wanting to use them.

Chapter 3

General comments

We were pleased to see that the policies in this chapter reflect the need for housing in Oxford to catch up with job provision. Increasing housing stock must be prioritised above developing new employment sites. Otherwise, planning policy will exacerbate the number of workers forced to live outside the city due to unaffordable housing.

Whilst beyond the scope of this plan, we would also encourage the Council to commission exploratory work into introducing a tourist tax, with the money raised spent on mitigating the environmental impacts of tourism and promoting better wages and conditions in the tourism sector.

Policy specific responses

E1: Employment Strategy

We broadly support this policy, but are concerned that the potential for the intensification of employment sites (which this policy supports) to add to housing need has not been considered. Where employment sites can be intensified, it should be strongly considered whether the space freed up can be used for housing, especially where employment sites are in sustainable locations. We are pleased that the loss of category three sites to housing is actively supported by the plan.

E3: Affordable Workspace Strategy and Affordable Workspace Provision on Commercial Sites

We would also be interested in seeing if this could be applied to retail units in order to provide affordable premises for local independent retailers.

E5: Tourism and Short Stay Accommodation

We broadly support this policy, but feel the plan should be more open to hotels with more than ten bedrooms being converted into residential use. These sites could provide much-needed residential units and, given the number of new hotels being built in the city, it is likely that hotel provision will remain acceptable.

Chapter 4

General comments

Overall, this chapter contains some ambitious policies which make welcome improvements on the policies of the previous local plan. We are particularly happy to see strong policies on greening urban areas and ensuring there is access to nature for everyone living in the city.

However, our concerns come about the exemptions built into these policies. Having developed strong policies, we do not want developers to be able to easily avoid following them. As with other sections in this document, we would like to see more detail on the cases where exemptions to local plan policies will be allowed. We would also like to see reiteration of the need for developers to maintain biodiversity offsets in the medium to long term, to ensure this net gain is not lost.

We would like to see policy setting out how new sites can be added to the Green Infrastructure Network, particularly in parts of the city less well-served by existing green and blue sites. We would also like to see policy enabling parklets and restricting the paving over of front gardens with non-permeable surfaces. We are keen for the council to consider how there can be independent oversight of ecological assessments submitted by developers, as too often the process where developers hire their own inspectors can be open to abuse.

Policy specific responses

G1: Protection of Green Infrastructure

We support most of this policy, but have concerns about the consequences of the policy to allow building on residential garden land. We would like to see a requirement for consultation with surrounding residents, beyond what is generally required, as in some locations this may have a significant impact upon the amenity of nearby homes. We also believe that there is unlikely to be a circumstance in which ancient woodland, or a veteran/ancient tree, should be developed upon.

G2: Enhancement and provision of new Green and Blue features

This is a positive policy. We are pleased that developers will be responsible for maintenance of GI for the first five years, but would like to see them required to set out a plan for the management of GI beyond this.

G3: Provision of new Green and Blue features – Urban Greening Factor

We would like to see lower socio-economic areas specifically highlighted for use of the UGF tool, given that these areas have less access to green space in Oxford. For example, in these areas, non-major developments could be required to use the UGF tool.

G4: Delivering mandatory net gains in biodiversity

We are disappointed that Oxford has not set a requirement for biodiversity net gain above the new legal minimum. Other councils are considering this, including Bath & North East Somerset (15%) and Kent (20%).

Chapter 5

General comments

This chapter makes significant improvements upon the policies in the Local Plan 2036. We particularly support the policies around retrofitting listed buildings, which present a real challenge in a historic city like Oxford.

We note that at Full Council on 25th Jan 2021, the City Council passed a motion adopting the definition of net zero used by the UK Green Building Council, which included embedded carbon. We do not believe this has been followed in the plan, as operations of buildings have been separated from construction, with the latter not required to be net zero.

These policies should also be underpinned by a plan for renewables in Oxford. The city should work with partners to identify sites for new renewable energy generation and provide guidance on how on-site renewables can be delivered best. Such a plan will be vital to ensure there is oversight of how renewables are developed, ensuring there is join up between developments and adequate capacity for the increase in developments.

Policy specific responses

R1: Net zero buildings in operation

This policy is a marked improvement on the current Local Plan 2036. We are pleased to see a thorough process for removing fossil fuels from buildings and reducing energy use. We are pleased to see that this policy goes beyond percentage changes in emissions and instead sets absolute limits for energy use, recognising that anything is meaningless in a situation where every kilogram of CO₂ produced worsens the climate crisis.

R2: Embodied carbon in the construction process

Particularly for larger developments, we would like to see specific targets set for the maximum levels of embodied carbon involved in the construction process. Without this, the claims of net zero buildings in policy R2 are undermined.

R3: Retro-fitting existing buildings

We support this policy, particularly the positive approach it takes to the retrofit of historic or listed buildings. We would welcome mention of the impact conservation areas can have on attempts to decarbonise (*i.e.* in conservation areas, cladding often cannot be added to buildings as it would disrupt the appearance of a street) and a similar positive approach towards allowing sensitive retrofit in these areas.

R6: Soil quality

We support this policy, particularly the note that simply offsetting emissions from developing on peat soils is unlikely to be acceptable.

Chapter 6

General comments

Whilst we strongly support the protection of Oxford's heritage assets and "dreaming spires", we would like to see the policies in this section better integrated with policies on net zero buildings, affordability, and efficient use of space. Whilst heritage considerations are mentioned in the respective policies for these issues, we feel that should be blacked up by mention of these issues here.

We are disappointed there is no longer a policy on delivering public art as part of larger developments.

Policy specific responses

HD1: Conservation areas

As stated above, a positive approach to retrofit in conservation areas must be taken. A positive approach must also be taken to densification of some sites within conservation areas, where appropriate care is taken to minimise harm to existing amenities, to allow Oxford to deliver the housing it urgently needs in sustainable locations.

HD15: Bin and Bike Stores and External Servicing Features

This policy should have an addition mentioning the desirability of providing bike storage for non-standard bikes, such as cargo bikes or trikes, which are increasingly popular.

Chapter 7

General comments

Though this chapter includes positive policies, we believe it misses some key opportunities to empower community groups and give them greater agency over the community spaces they depend on. There are no policies on how the users of community spaces will be consulted, which seems particularly important when space in Oxford is limited and we are likely to see developments proposing to make community use of space "more efficient" by combining uses, or providing alternative provision elsewhere.

On car parking, we note that the parking standards originated in the City's 2007 Parking Standards SPD (re-iterated in the March 2022 TAN), and this means that car-free developments are fairly difficult for developers whilst they should be easy. We believe there must better reference to both the Local Transport and Connectivity Plan (LTCP) and the Central Oxfordshire Travel Plan (COTP), as well as the relevant travel hierarchies.

Policy specific responses

C1: Town Centre Uses

We would like to see Magdalen Road added to the list of Local Centres, as it clearly meets the criteria for a local centre and is a well-used local hub. With over 100 small, local businesses on Magdalen Road, it better fits the Local Centre description than St Clement's, which is included, and it is far more than "a small parade of shops with a purely local function". We are pleased that this policy discourages out of town retail sites and that no exemptions have been included for the criteria that must be met on walking/cycling/public transport links, impacts on road network and loss of amenity at neighbouring sites.

C2: Maintaining vibrant centres

We are pleased this policy encourages the reduction of car parking, particularly large surface level car parks.

C3: Protection, alteration and provision of local community facilities

We recommend that this policy notes the need for extensive engagement with the local community if a community facility is to be lost or altered. We would also like to see this policy address more explicitly how it will preventing the reduction in size of community spaces.

C5: Protection, alteration and provision of cultural venues and visitor attractions

As there is no specific policy on pubs in the new plan, this policy (or policy C3) should make explicit that they cover pubs, which provide important community spaces in many communities. We would suggest that the Council considers adopting CAMRA's model planning policy, particularly the Public House Viability Test, to ensure pubs are not deliberately run down so they can be redeveloped into more profitable uses for the owner.

C6: Transport Assessments, Travel Plans and Service and Delivery Plans

Construction Management Plans should be required not just where large amounts of construction traffic will be generated, but also for developments where smaller amount of construction traffic may cause significant disruption to the surrounding area (e.g. on small residential roads where access to the site may be very limited).

C7: Bicycle and Powered Two Wheelers Parking Design Standards

We are concerned that the provision for student accommodation to provide bike parking below minimum standards may be detrimental. Unless pre-existing bike parking is incredibly close to the new development, it is likely to be inconvenient to park bikes beyond the development, and this may result in bikes being locked to railings or lamp posts instead, which should be avoided.

Chapter 8

North infrastructure area

These proposals will result in a very built-up area in North Oxford. Taken cumulatively, if all sites both within the city and those sites in Cherwell which will meet Oxford's unmet housing need, were developed as allocated, Oxford and Kidlington would become one large urban sprawl. If these developments go ahead, we estimate that there will be a continuous built-up area from Shipton to South Abingdon, around 13 miles. This will dramatically change the character of this part of Oxfordshire and undermine the policies elsewhere in this paper on preserving green corridors for nature.

Large areas of Cherwell's green belt have already been given up to meet the city's unmet housing need. We accept that it will likely not be possible for Oxford to meet this need entirely within its own boundaries. However, some of the proposed site allocations in North Oxford impose unacceptably upon Cherwell's space.

We have particular concerns about developments proposed around Yarnton and Begbroke, where the need being met by new housing will be less Oxford's need than Oxford University's need (through Begbroke Science Park), with the university's housing need

conflated with that of the city. The proposed relocation of the Kassam Stadium to this crucial green corridor would also be inappropriate, though we recognise this move is largely managed by the county council.

In the Northern Edge of Oxford Area of Focus we welcome the stipulation that new developments must deliver improvements to walking, cycling and public transport infrastructure. Walking and cycling links are sorely needed to ensure this is a sustainable location to live or work in. Further development of the Northern Gateway (SPN1) site must prioritise housing, particularly homes for social rent, as well as considering the impact of further development on existing residents, who have already seen significant changes to their area through the development of Oxford North. The plan refers to Red Barn Farm, which currently has a community function providing education and training for disadvantaged and vulnerable young people. The plan says these facilities may be re-provided under policy C3, which could result in re-provision outside the city. We consider this unacceptable - if developed, re-provision must be considered in collaboration with current users, looking to re-provide within the city so services remain accessible to those using the service at present.

If development comes forward at Oxford University Press Sports Ground (SPN2), loss of sports space - particularly the spaces which were available adhoc to the public - should be re-provisioned elsewhere, ideally nearby to the current site.

South infrastructure area

It is very positive to see the overflow car park at the Kassam Stadium (SPS3) allocated for residential or public open space. We would be very keen to see this site come forward in such a way.

The Sandy Lane Recreation Ground (SPS6) is well-used by the community. As such, we feel it is inappropriate for the sports pitches to be allocated for development, as it is unlikely they can be re-provided nearby. Other playing fields at Knights Road (SPS10) have also been allocated for development. Taken together, the loss of these facilities is unacceptable and removes important recreation facilities in what is already one of the most densely populated parts of the city.

There is local opposition to building houses at the end of Knights Road (HELAA#593). It replaces a recreation ground adjoining the Spindleberry Nature Park. It could be acceptable provided that there is development of recreation facilities in Fry's Hill Park, linked by a footbridge to the area, and extending the nature park along Northfield Brook on both sides, so increasing biodiversity. If developed, this site would also need improvement in the cycle and footpaths connecting it to Blackbird Leys Road and Spring Lane.

We object to the proposals to build homes in Bertie Park (SPS8), particularly if this will result in loss of green space, playground and the MUGA (Multi Use Games Area), all of which are well-used by local residents. Whilst the policy in this version of the plan is an improvement upon previous version, concerns remain - for example, we are pleased that the policy specifically notes that the recreation needs of teenagers must be met, but we are not convinced this can be achieved in the Wytham Street nature area without significant change to that green space (which may not be desirable from an ecological perspective). If this site is developed, it must keep or re-provide the MUGA, with suitable space between this and

any new homes to limit disturbance to residences, in keeping with guidance from Sports England.

Initial consultation on the development of the Blackbird Leys Central Area (SPS9) showed that residents wanted to see mixed use, with shops but also a community centre at the same size as the existing community centre. There is also an unacceptable impact upon local nature, which is particularly important in a built up area such as Blackbird Leys. Plan to mitigate this impact seem insufficient in current plans, so we would like to see the site allocation strengthened in this regard. Current plans will also see a smaller community centre built. As plans for developing this site continue, we want to see residents' desires reflected in the final outcome, with significant and innovative community spaces provided that do not result in a decrease in facilities provided for local people.

We support high density residential development of the Cowley Marsh depot (SPS11), given the sustainable location of this site.

We oppose the allocation of Land at Meadow Lane (SPS13) for development. There is significant local opposition to development on this site, which provides a vital wildlife corridor and is rich in biodiversity itself. Current pre-development activities on the site have already shown that works cannot take place here without disruption to the natural environment, including protected species like badgers and potentially damage to protected sites like the Iffley Meadows SSSI. We do not believe it would be possible to adequately mitigate the environmental harm which would be caused by developing this site.

We are concerned about the allocation of the Former Iffley Meads Playing Fields (SPS14) as residential development. As with Land at Meadow Lane, this site provides a vital wildlife corridor and given its lack of use in recent years is likely to be rich in nature. Given how well-used the nearby Donnington Recreation Ground is for football and other sports, this site has excellent potential to become public green space, linking the Donnington and Rose Hill areas to Iffley Village. If the site is developed, the 10% public green space delivered should endeavour to provide this link instead.

We also object to the development of homes at Redbridge Paddock (SPS15). It is an unregulated former landfill site and is prone to flooding, both of which would present significant risks to future residents. Contaminated land such as this can pose a health risk to residents as toxic fumes can be released from the waste, a risk increased by the likelihood of flooding at the site. Rather than building homes here, the site could be turned into a nature reserve, as has been done with other former landfill sites across the city, including at Port Meadow and Aston's Eyot. The proposed development does not include enough green space, particularly if Bertie Park is also lost. The proposed developments at Bertie Park and Redbridge Paddock would mean approximately 500 new residents in the area, with no planned increase in schools, GP surgeries or other community facilities.

Eastern area

Many of the sites in this area, particularly those around Marston and Headington, are likely to have significant issues with transport connectivity at present, with both active and public transport options limited. As such, we would like policy MRORAOF to be strengthened, to ensure that improvements to walking, cycling and public transport must be delivered, rather

than it being down to the developer to decide where this is applicable. We hope the council will be able to ensure developers make significant investment in public and active transport as part of the planning process.

Land West of Mill Lane (SPE11) will have significant transport implications if there will not be a junction with the A40.

Developing Union Street Car Park (SPE16) would certainly pose challenges for Cowley Road, with all surrounding streets included in Controlled Parking Zones. The car park is mainly used for mid-length trips to South Park or Cowley Road shops. However, as the car park is generally not full, we would suggest that a portion of the car park is developed for high density residential use, with the remaining left to serve Cowley Road shops and entertainment. Given that high-end student accommodation has been developed above Tesco, we would like to see this site allocated for non-student residential use.

We also support residential development at Jesus and Lincoln College Sports Grounds (SPE17). Again, these are very sustainable locations and additional residential units around Barracks Lane may make the area feel safer at night. If playing fields are not retained, we agree that public open space should be provided here alongside housing, and if sports facilities are provided elsewhere they should provide opportunities for public, as well as private, use.

Central and West Oxford infrastructure area

The Canalside Land, Jericho (SPCW4) site has proven complex to develop and has already seen conflicting views from the developers, local community and the council's planning committee. A key issue for local people is a commitment to community access to boatyard facilities, providing space for locals to do DIY boat repairs, rather than a commercial boatyard alone being developed. We would welcome inclusion of this commitment within the site allocation policy.

As reflected in councillor responses to the West End and Osney Mead SPD, we would like to see this area (WEAOF) being allocated for more housing and less hotel, retail, leisure and employment use. We think this area offers excellent opportunities for dense developments that can make significant contributions to Oxford's housing need. Though we recognise the need to protect Oxford's heritage assets, we also feel parts of these sites may be suitable for taller buildings, which could add new interest to Oxford's skyline whilst complementing historical buildings.

At the Botley Road retail park (SPCW8), we support plans for a less car-centric development. We would like to see developers encouraged to explore with the Environment Agency the possibility of expanding floor space to allow for shorter buildings near to residential streets, given that so much hardstanding car park will be removed, so hard surface area will not be increased.