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55.1 - 55.2

SUMMARISED

Oxford Local Plan

Proposed Submission Draft, November 2018

Comment Form

Part A

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Date: 20.12.2018

Data Protection.

- I would prefer all personal details other than my name and a non specific address to be obscured

I do not wish to speak at the examination hearings

I wish to be notified when

- The Council submits the plan to the Government
 - The Inspectors Report is published
 - The Plan is adopted by the Council
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Part B form 1 of 2, from Gill Davidson

1. This representation relates to Paragraphs 3.1 to 3.12 and Policy H12

2. I consider the Proposed Submission Plan to be Unsound

3. I consider the Document Unsound because it is Not Justified and Not Effective

4. Reasons why the plan is not compliant and unsound

55.1 H1
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Firstly the plan is based around a housing target which is out of date. The Council's own 2018 updated assessment of need and the Government's own standard methodology for calculating need, put the need at around 750 dwellings per annum rather than the 1400 in the Council's target.

Secondly, Oxford has underestimated its own capacity for new housing. A number of sites allocated for employment such as the Northern Gateway could be used for housing. As Oxford already has full employment there is not the need for so much new employment in the City. Furthermore it assumes much lower housing densities than are possible in an urban area when planning predominantly for small dwellings. It is possible to double the proposed density for small dwellings in an urban area. It is small and affordable dwellings for key workers that should be the focus to meet housing need.

Oxford's submitted plan means that surrounding Districts are expected to build large numbers of houses to meet Oxford's assumed needs, destroying Green Belt and the character of this historic city in the process. This is not necessary, because these needs have been vastly exaggerated and because Oxford's capacity has been underestimated as outlined above.

This Oxford Plan inevitably leads to building on huge areas of green land outside Oxford. The Cherwell Local Plan, currently at submission stage, allocates major areas of Green Belt for housing near Oxford. This includes North Oxford Golf Course which has been in existence for 110 years and is used by many people for recreation and social purposes. Whilst I am against the development of any golf courses for health and environmental reasons; it does seem ironic **that whilst the City Policy G1 protects recreation facilities, and Oxford (correctly) does not propose for development Oxford (Southfield) Golf Course. The City representations on the Cherwell Local Plan concur with the allocation for housing on North Oxford Golf Course which immediately adjoins the City boundary. The location of Oxford Golf (Southfields) Course is central and near hospitals**

where key workers are needed and thus more suitable for development than the golf course in the Green Belt.

5. What changes are needed

The plan should use the latest assessments of housing need, which are little more than half of those shown in the plan. H1

The plan is too protective of land for employment. It should give more priority to housing and to increasing housing density on housing sites. Housing is needed within the City not on its boundaries. Housing on the boundaries will exacerbate problems of traffic congestion and air pollution which are out of control in the City. E1 55.2 233

Part B form 2 of 2, from Gill Davidson

1. This representation relates to paragraphs 2.1 to 2.10 and Policy E1

2. I consider the Proposed Submission Plan is Unsound

3. I consider the Document Unsound, because it is:

Not Justified and Not Effective

4. Reasons why the plan is not compliant and unsound

The City Council is planning to increase employment substantially in the City which will be very damaging because:

- Oxford has very low unemployment already and does not need more jobs
- Increasing the number of jobs will inflate the population of the City beyond its capacity

- it will mean even more traffic congestion on the road network which is already over capacity
- it will mean even more pressure and congestion in the city centre which is heavily polluted.
- Air pollution which is already above accepted EU standards will increase
- it will attract people to the area resulting in more demand for housing and pressure for development on the Green Belt

The City Council does not therefore need to protect sites for employment as proposed in Policy E1 because:

- many of these sites could be better used for other purposes and especially housing. Houses are needed for key workers in the City. There is no need to build more low density high value properties. There is no demand for these. These will also attract London commuters who bring no economic benefit to the City
- many employment sites in and around the City such as Oxford BusinessPark and Oxford Science Park are already undeveloped or unoccupied.
- the Council appears to ignore the many, large science parks and other sites that are being planned near Oxford such as at Kidlington, Eynsham and Bicester
- there is no need for "knowledge-based" businesses to be located in proximity to Oxford, especially because of the availability of high speed internet. In fact they would be better located in areas where housing is cheaper.

5. What changes are needed

Policy E1 should be less rigid, and should permit housing on suitable employment sites, especially where these are currently underused.

The City Council should actively encourage the re-location of businesses, including some academic, research and medical activities, to suitable locations elsewhere in the county, where it is not essential for them to be based in Oxford.