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Response to Oxford Local Plan 2040 submission draft

The Wolvercote Neighbourhood Forum (WNF) seeks to represent the views, in relation to planning matters, of residents in the Wolvercote Neighbourhood Plan area, which lies entirely within Oxford City. The Wolvercote Neighbourhood Plan (WNP) was approved overwhelmingly by our residents in a referendum in May 2021 and was subsequently 'made' by Oxford City Council.

The WNF Steering Committee has considered carefully the submission draft of Oxford Local Plan 2040. While broadly supporting many of its proposed policies, **we consider others to be unacceptable in their present form, and we ask that Oxford City Council re-consider them in the light of our objections.** Please see below for details of our comments and objections.

Our context: the Wolvercote Neighbourhood Plan area

Our comments should be taken in the context of policies in the WNP 2019-2034 and our previous submission to the Oxford Local Plan 2040 Preferred Options Questionnaire in 2022.

The WNP area stretches right along the northern boundaries of the City from the river Thames in the West to Cutteslowe Park in the East, and extends south to include much of the northern portion of Summertown. It is a diverse community. It has a range of middle-income earners but also significant pockets of deprivation. It is not as homogenous as some might think. It has higher than city average dependency rates for under 5s and over 65s, compared to persons of working age.

There is no access to dental services, and the two small GP practices are over-stretched to cope with existing demand. The only shops are three convenience stores spread across the area, beyond a reasonable walking distance for many homes. The elderly population is increasing. During the period 2011-2021 its population increased by 1.40% (source: www.citypopulation.de) with an age distribution in 2021: 54% aged 18-64 years, 24% aged 0-17 years, 20.2% aged 65+ years. It benefits from proximity to Cutteslowe Community Centre and several community buildings in Lower Wolvercote and Cutteslowe Park. But for facilities for young people it is completely dependent on Wolvercote Young People's Club: this, despite very challenging budget cuts in recent years, serves 160 young people across Oxford and nearby under-provided neighbours. Its survival is essential for the well-being of young people in our community.

Our area is adversely affected by exceptionally high levels of traffic, air pollution and traffic noise on the arterial roads. Apart from the nuisance to residents, these reduce

safe access to key services and transportation. They are also a disincentive for safe cycling, especially in reaching other principal centres or the train station at Oxford Parkway. Moreover, a large proportion of our area is blighted by poor access to bus services. Although regular buses run on Banbury Rd and Woodstock Rd, these are too far from many homes to be usable by residents, especially the elderly. These problems will increase with the arrival of over 2000 new houses and a science park within our area, unless City planning policy changes to remedy them.

In summary we want the City to adopt planning policies that will positively benefit, integrate and connect our community, reduce isolation and improve well-being in a holistic manner: a piecemeal approach will not suffice.

Our comments on Oxford Local Plan 2040

Chapter 1 Vision and Strategy

Policy S1 (*spatial strategy*) We are pleased there is much reference to encouraging 'sustainable development'. However, we are concerned that the Local Plan as written is not rigorous in expressing its sustainability goals, offering the possibility of dilution of the aims when applied in practice. A glossary should be added (as appears in subsequent chapters), explaining quantitatively what exactly is meant by all important terms relating to the environment, such as 'net zero carbon', 'sustainable development' and 'sustainable growth', in the context of the city's vision and strategy.

Policy S4 (*viability of affordable housing*) 'The affordable Housing Viability Cascade...reduces the amount of social rent properties incrementally until (a project) is viable.' Given Oxford's ever rising property values and exceptionally high need for affordable housing, this policy as presently expressed is inadequate. All hangs on the Council's subjective judgement of what has been 'robustly proven' by a developer. Prior experience in our WNP area (e.g. at Oxford North) showed how easy it is for a developer to exploit the weakness of Council policy to argue down the proportion of affordable housing to be provided. The policy as written is not adequate to prevent this: it must be tightened, e.g. by explicit inclusion of the need for independent expert opinion to verify the robustness of developers' claims.

Chapter 2 A Healthy, Inclusive city to live in.

§2.6 (*Maximising housing capacity in the city*). We are disappointed not to find a clearly stated objective of maximising the proportion of people who both live and work in the city. This should be embedded in policy, if goals to reduce unsustainable modes of transport are to be really achieved. Simply pushing new housing to meet Oxford's need onto neighbouring districts will significantly increase commuter traffic into Oxford, placing further stress on over-capacity arterial roads in our area, and around the city generally. We ask that a specific policy is added to the plan, that requires rigorous application of preference for housing over commercial development within the city, including on brown-field sites.

§2.8 - Policy H1 (*housing numbers*) The claimed housing need figure of 1,322 new dwellings per annum (dpa) is based on the unique and unorthodox HENA methodology, whereas the nationally recognised approach is the Government

Standard Model, which gives a figure of 762 dpa. Consequences for the city of adopting the 73% higher figure will be severe, (in terms of commuting numbers for example). So it is grossly misleading to residents to employ it without providing a full explanation of (a) the resultant problems expected, and (b) a very strong quantitative justification. These should be added to paragraph 2.8.

Policy H2 (*proportion of affordable housing*) We are very disappointed to see the Council's previous ambition to achieve 50% affordable housing on significant new developments has been watered down to only 40%. In our WNP area, the need for affordable housing is extreme, and we urge the Council to reconsider this decision for the final draft of the Plan.

§2.39 – Policy H8 (*concentrations of HMOs*) We support HMOs as an efficient means of accommodating individuals not on the housing ladder. However, we fear that this policy in its current form will lead to an excessive density of HMOs, which experience shows can harm the ambience of residential streets. In our view, the street length referred to in the policy should be increased from 100m to 150m or more. Moreover, the policy should be strengthened by reducing the maximum proportion of HMOs allowed within such a street length from 20% to only 5 or 10% at most.

Chapter 3 A Fair and Prosperous City

We agree that new student accommodation and older persons accommodation should be required to provide financial contributions towards provision of affordable housing (Policies H3 and H4). But we disagree that this should not also apply to holiday and short-stay accommodation (referred to in Policy E5). There is no justified reason for treating holiday and short-stay accommodation more favourably than student accommodation. We urge the Council to add a further policy, specifying that, for development of new sites of more than 10 holiday or short-stay accommodation, the City will 'seek a financial contribution towards affordable housing to be delivered elsewhere in Oxford'.

Chapter 4 A Green, biodiverse city.

§4.11 We applaud the explicit inclusion of hedgerows in the draft plan. Wolvercote has many ancient hedgerows that need preserving, and we are disappointed the Oxford North development has been allowed to destroy so many hedgerows. Greater emphasis needs to be given to protecting or creating wildlife corridors to encourage biodiversity. (see WNP Policy GBC1).

Policy G2 (*New green and blue features*) This policy states 'For residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required'. In our view this is disappointingly unambitious. Given the huge benefit that open space contributes to quality of life in new developments, we urge the Council to increase the requirement from 10% to 15%.

Policy G3 (*Urban Greening Factor*) Oxford is choosing to add a novel method introduced by Natural England to assess biodiversity using "Urban Greening Factor" calculations in addition to DEFRA's 10% uplift in biodiversity. While Oxford is using

UGF for “its simplicity”, it is also intended to produce an alternative biodiversity measure, to avoid prescriptiveness and to allow developers to freely choose their components to create an on-paper case for their biodiversity impacts. We consider this to be (a) confusing and (b) a risk to public accountability. We therefore urge the Council not to allow developers to use UGF calculations to evade meeting the DEFRA 10% biodiversity uplift requirement.

Policy G8 (*Use of SuDS to minimise run-off water*) The WNF supports this policy, as it is consistent with WNP policy BE27:

‘All run off water should be infiltrated into the ground using permeable surfaces (SUDS), or attenuation storage, so that the speed and quantity of run off is decreased.’

Nevertheless we are deeply concerned that water quality in our rivers is deteriorating significantly, and increasing development will make this worse. Present water treatment plants are inadequate and assurances from Thames Water cannot be relied upon. Environment Agency figures for 2022 state that storm overflows were used 15 times in rivers within Oxford’s local authority boundaries. This is not a complete reflection, as 39% of Thames Water facilities did not report overspill data last year. In view of climate change, the increased number of houses envisaged up to 2040 and beyond, and Thames Water’s poor record, it is most unlikely that the water facilities will cope, even if efficiencies reduce per capita water consumption. Hence the wording of the policy needs to be made more robust; placing increased onus and responsibility on developers and water suppliers to ensure quality standards and reliability. In particular, what can qualify as ‘exceptional circumstances’ in which surface water is permitted to be discharged into a combined sewer, should be tightly specified.

Chapter 5. A city that utilises its resources with care

We approve of the Plan’s net-zero carbon general aims, but we believe they should go further.

§5.11 (*renewable energy sources*) We are disappointed that solar PV is not required automatically on all roofs in new developments, wherever there is exposure to sunlight¹. Local Plan Policies C8, R1, H2, need to be more rigorous and insist on the use of solar panels on ALL buildings to facilitate meeting net zero carbon objectives, unless there are very compelling heritage or environmental reasons against this.

Current wording of the Plan on this topic is weak and likely to lead to developers evading use of solar PV, in order to (very slightly) reduce building costs.

Policy R1 (*new buildings are net zero carbon in operation*) This policy states (in paragraph 5): ‘As a last resort, where the above steps have been fully explored and net zero carbon still cannot be fully delivered, offsetting may be acceptable to

¹ We note that even King’s College chapel, Cambridge, now has solar panels on its roof. Our residents want Oxford to be more ambitious.

mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location.'

This is a weak get-out clause for developers, and needs to be tightened, requiring use of solar PV even if it cannot supply all energy needed.

Policy R2 (*embodied carbon in construction process*) We strongly support the aim of this Policy. But we fear it is so weakly worded that it will have little influence on construction practice: all the requirements imposed are qualitative and subjective. Even for large developments ((f) and (g)), the only additional requirement is to provide information on predicted embodied carbon of construction, and how much less this is compared to an unspecified reference. We urge the Council to be more ambitious, aiming for construction processes that have net zero embodied carbon, by revising (f) and (g) to impose, if not zero, a demanding quantitative upper limit to what is acceptable.

Chapter 6 A city that respects its heritage.

In Chapter 1 (above §1.23) the stated vision is a City with: *'Well designed buildings and public spaces that feel safe, that are sustainable, and that are attractive to be in and travel to. Our valued and important heritage will be protected and enhanced.'*

Oxford has many cultural buildings of high quality that are much admired. Equally the place and setting in residential estates and environments is also very important in forming strong bonds, social harmony and connection with the people who live there and bring up their families. The ambition to preserve 'heritage assets' must not be confined to buildings in the city centre. In north Oxford, too many distinctive quality houses are being destroyed/removed, and this is significantly changing the character of some streets. We realise the need to increase housing density overall, but this must be done sensitively, without the trashing of architectural quality. That is counter-productive to the fostering of a sense of place and character of established communities. It breeds claustrophobia and alienation. We therefore strongly support policy HD7.

Policy HD9 (*Views and building heights.*) We support the intentions of this Policy, but we are concerned that, in present form, it is inadequate. One of Oxford's major heritage assets is Port Meadow. We urge the Council to revise Policy HD9, to make clear that its intention includes protecting views both to and from Port Meadow, and not only to and from the city's Historic Core Area. For example, in the first paragraph we suggest 'Oxford' is replaced by 'Oxford (including Port Meadow)'. Past experience of the Castle Mill flats disaster has shown that, without such clear policy intention, the preciousness of views from Port Meadow will be neglected in the planning process. A current example is that the Red Hall and other high buildings being built in Oxford North are widely expected to blight views to the north from Port Meadow. We urge the Council to amend the policy as above, to prevent such errors recurring in future.

Chapter 7 A liveable city

Policy C2 (Maintaining vibrant centres) We support c,d,g,h in this policy. However, restriction of certain modes of transport inhibits individual freedoms and access to travel. Such measures need to be aligned in parallel with easy to reach, fast, efficient, and affordable alternatives to meet social, essential employee and customer needs and to reach and facilitate business and places of study: all necessary for vibrant and prosperous communities to flourish. Not all this can be achieved by bicycle. If people cannot achieve access to neighbourhood hubs and the city centre then they will suffer badly. Bus routes do not successfully inter-connect across to other areas of the city without changing buses and a long walk. For example, in the WNP area, the greatly-valued number 7 bus from the Templar road estate to Jericho was withdrawn.

§7.53 and Policy C8 (Parking design standards) We believe that this policy is misguided in its intention to reduce access to car parking so dramatically in so many situations. Imposing 'low car' or 'car free' residential developments, except in special or unusual circumstances, will have too many damaging effects. We agree strongly with the aim of discouraging use of private cars, but the application of this policy in Oxford, in the absence of much more comprehensive public transport availability, would blight particular neighbourhoods unreasonably, e.g. by causing displaced parking and by depressing the market value of properties.

Policy C9 (EV charging) We strongly support the aims of this policy, but in our view it should be strengthened in two respects. For new build residential developments with on-street parking, the Policy should specify the minimum proportion of parking spaces that must be electrified (we suggest 50%). Similarly, for new build non-residential developments, the requirement for 'access to' EV charging should be strengthened to specify a minimum proportion of parking spaces to be electrified (again we suggest the norm should be 50%), unless it can be robustly demonstrated that this would be excessive for a particular development.

Chapter 8 Development sites

North Infrastructure Area of Focus.

This Area of Focus lies entirely within our WNP area. We are pleased to see in §8.12 that key considerations are:

- Reduce air pollution to protect the SSSIs/SAC at Port Meadow.
- Retain the integrity of the Green Belt by careful design at its edges.
- Wolvercote Neighbourhood Plan.

Policy SPN1 (Northern Gateway) We object to unconditional permitting of re-development of the Wolvercote services area. This could potentially adversely affect a large portion of the WNP area. The area is poorly served by shops (see above in Our Context). Wolvercote services provides the only food shop within reasonable walking range of many of our residents. Any re-development must be conditional on

replacing this facility. We therefore urge the Council to make this clear in paragraph 1 of SPN1.

The policy specifies *'Development at Pear Tree Farm must ensure pedestrian and cycle access through the site to encourage and support connections between Oxford Parkway Station and the wider Northern Gateway development.'* The existing footbridge across the railway line nearby is obviously unusable by anyone with a bicycle. We therefore interpret the Policy as permitting development at Pear Tree Farm only after a new cycle-friendly railway bridge has been achieved. This has our full support.

Policy SPN2 (OUP Sports Ground) We accept the policy's committing of some of this space to new development, providing homes and associated public open space, subject to the condition that *'The capacity of the sports provision must be maintained'*. We also accept the policy's proposal that some of the housing could be flats. But since no limit on height is mentioned, we object to the policy's suggestion that these could be located to the 'west' of the site, as this would maximise the chance of overlooking of existing housing in Linkside Ave, as well as new housing. We urge the Council to replace 'west' in 'Urban design and heritage' by 'east'. The most appropriate location is the south-east corner of the site, to minimise overlooking of other new housing, and nearby existing housing at Jordan Hill or Linkside Ave.

From Wolvercote Neighbourhood Forum Steering Committee:

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