

Response to Consultation on Draft Local Plan 2040

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Introduction

My response deals firstly with broader issues concerning the city and parts of East Oxford, particularly the rapid expansion of housing beyond the ring-road in Littlemore and Blackbird Leys. Secondly, I focus on the issues of consultation with, and consent of, local communities in respect of planning. Thirdly, the response discusses related questions of preserving rapidly diminishing conservation areas and green spaces in Iffley and within the ring road more generally.

Many of the issues facing this part of East Oxford are highlighted in the Council's consultation document for the 2040 Local Plan. The areas of Rose Hill, Littlemore and Blackbird Leys include some of the more disadvantaged parts of the city: I support in principle key recommendations such as more social housing, better services, particularly in less affluent areas, a reduction in traffic and protection of open spaces. The question is how to achieve these without destroying the distinctive character of Oxford as a beautiful and, on the whole, successful city. How can housing, infrastructure, services and green spaces be simultaneously and effectively achieved in particular zones? I believe that this zone should be considered as a whole and not piecemeal as currently seems to be the case.

Oxford is experiencing a period of growth: within the ring road; along its outer rim; and beyond in some peri-urban settlements and commuter villages. Spatially this is resulting in, simultaneously, a denser city centre and higher rates of commuting into the area within the ring road. The city cannot cope any longer. The Council has facilitated major retail developments, particularly Westgate, as well as expanding employment in education, health and other sectors. It has also facilitated ever-denser housing within the ring-road through a great deal of infill building. Some of this makes provision for students and further squeezes space for housing for the non-student population. Both processes are leading to a decline in green spaces within the ring road on university/college property and more generally.

At the same time, the city has to cater for tens of thousands of daily commuters from the housing developments adjacent to the ring road and beyond. This is not least because of the concentration of services, retail and employment in and around the city centre. Traffic is often grid-locked and commuting times have in some cases increased.

Proposals for hubs

The council is advocating a 15-minute neighbourhood strategy, which I support in principle. This aims at developing multi-functional hubs that are in reach by

without cars within about 15 minutes. However, it seems to be focussing largely on the area within the ring road. Within my area, Cowley road and Templar square to some degree serve this function. There is certainly scope for additional hubs, or mini-hubs, such as at Rose Hill.

I suggest that a priority should be to make this strategy effective beyond the ring road. Housing is expanding rapidly on the peripheries of Littlemore and Blackbird Leys, and a major development is planned for Grenoble road. The future of the Kassam stadium site is uncertain but may also be partly developed for housing. There is a good deal of employment in or near this area at the Science Park, BMW factory, educational institutions and elsewhere. While a few big supermarkets are within reasonable reach, it lacks a multifunctional, attractive and vibrant hub. These areas record some of the highest levels of deprivation in the city and development aimed at improving the local quality of life is a priority.

Where this should be is a matter for urgent consultation. Options include existing small hubs in Littlemore and Blackbird Leys. The council has invested in Blackbird Leys in relation to facilities such as the leisure centre. But it has not succeeded in facilitating an effective hub that attracts private sector investment and services. This is at least partly due to the lack of space and spatial planning. The built-up areas of Blackbird Leys and Littlemore do not have the space for expansion around their small clusters of shops.

One possibility is the zone where the Science park, Kassam Stadium, Vue, and new housing on the peripheries of Littlemore and Blackbird Leys converge. If Grenoble road housing goes ahead this would be an even more central point. At present the different facilities are barely connected to one another. There does not seem to be coherent planning here. The Science park stands separate, fenced, uni-functional, and car dependent, precisely like the American cities that 15-minute neighbourhoods are supposed to supersede. Planners urgently need to conceive an attractive, multifunctional hub that opens up the science park, links it spatially to housing, the hotel, Vue, with shops, offices, services and health centre. The Science park should be generating local spin offs and support enterprises. Space must be provided in the 2040 local plan otherwise it will be lost in piecemeal development.

This hub could function in the way of Cowley/Templar square, Summertown or Headington and it already has considerable employment opportunities. It should be sufficiently appealing not only for the surrounding community but to attract outsiders. To some extent it does, through the Vue cinema, but this serves very largely a vehicle-based clientele who drive in and out. A new hub needs architecturally attractive buildings (unlike the Vue) designed to interconnect spatially the different facilities and the housing.

In responses to the consultation document, many saw public outdoor space as particularly valuable and this should be accessible from the new hub and surrounding housing – routes for walking, running and cycling that are seen as ‘very important’ or ‘important’ by a large percentage of respondents. Effective routes should link all the housing and the hub with the surrounding countryside. Some public rights of way already lead towards Sandford and the Thames, Toot Baldon, Garsington and Horspath, but they should be improved, extended and connected for circular routes.

If Grenoble road housing is built there should be increased connectivity in the shape of a bridge and/or tunnel to the hub because the volume of traffic on this road will increase exponentially. We need to think of this as a rapidly growing peri-urban centre in Oxford. The links from Littlemore to Rose Hill/Iffley road/Long lane also need improvement. Bus services are vital, and not only into the city centre (3A goes from Science park via Littlemore and Iffley road to city centre). One of the failures of planning in Oxford is to link the existing hubs and outer suburbs. It has become even more difficult to move around concentric rings in the city since the recent restrictions on car traffic and the routes that are still available have become even more clogged. There should be a good bus service around the ring road, linking Redbridge, Sainsburys, Littlemore, Tesco retail park, BMW factory, Homebase, Wood Farm and Headington/Hospital at least. Given the massive development planned for this area, the railway line, if it materialises, will help but there need to be enough stations along the route: at least Kennington (which also needs better facilities), Sainsburys, Littlemore, Blackbird Leys, BMW and through to Horspath.

A major development such as this will ensure that rapidly expanding housing provision in this part of the city does not become just a disconnected, underdeveloped sprawl, with residents depending on cars for those that have them, disadvantaged in relation to the city as a whole and likely to be bought up by landlords. According to the consultation document, Oxford already has lower than average home-ownership and higher than average rent. Good provision of social housing around employment opportunities at the hub is vital.

Attractive and viable hubs outside of the ring road will reduce the pressure on the areas within the ring road both with respect to ceaseless inbuilding and densification, erosion of green spaces and ever-more commuting and gridlock. Clearly it will not be possible to rival the city centre for all aspects of shopping, services and entertainment, and many will work there. But we need to ensure that the commitment to growth does not also result in the growth of deprivation and underdevelopment of areas beyond the ring road.

At the moment the council’s strategy seems contradictory: both to intensify the development of the city centre and to make it more difficult and time-consuming to get there.

Iffley conservation area is centre of a major dispute over council attempts to enforce housing development on the Horse field, a green field site within a conservation zone. Friends of Iffley Village is trying to oppose it. The land, misdescribed, was listed in the provisional 2036 Local Plan. With very limited local consultation, or even notification in the shape of leaflets, it was included; those that objected were dismissed. Few knew about the Local Plan. The Council's development agency bought the land for over £4 million – a very high price – when it knew that there were widespread objections. It then put forward a proposal for 30 houses, only 12 of which are social housing. There was widespread opposition in an online meeting (because of covid) and at public consultations by OCHL. Detailed objections have been made on a number of grounds.

It is the duty of the Council, its development agencies, those responsible for planning, and the Councillors to consult properly with local communities before they engage in such development. Planning policy should start with communities. The Council itself says so in its Statement of Community Involvement circulated for comment, to which I responded. This is made abundantly clear also in the consultation document for the 2040 Local Plan. There is little point in consultation if it is simply a disguise for top-down planning. If there is no local consent by those most immediately affected by specific planning measures, the process of consultation and engagement must continue until a resolution is reached. The Council has failed in its duty here. It should stop the planning process and engage in a thoroughgoing public planning consultation.

The Council and OCHL refused to provide an overview and engage with the community at the key early stage, which involved scheduling this land, misdescribed, in the Oxford Local Plan 2036. We needed extensive consultation and engagement, with an overview, and clear information about the consequences. The land in question was included in the draft Oxford Local Plan in 2018, but only 'adopted in 2020' according to the OCHL brochure when opposition was clear. Green field land in a conservation area should not be included as a site for building in the first place and the lack of adequate consultation and consent should ensure that it is removed from the Local Plan until proper consultation is complete.

Both the ownership (given as Donnington *Health* Trust, which is a local GP practice) and the location (given as Iffley Fields Ward, not Rose Hill and Iffley) were incorrect in the proposal for the Local Plan. This in itself is sufficient for

its removal from the Local Plan. You needed inside information to know which land was involved.

The first opportunity for any real local consultation was offered by Friends of Iffley Village in a questionnaire open to all of its members in July 2021. Of the 361 paid up members, 187 responded. At about 52 per cent this is considerably higher than the average turnout for council elections in the UK or for the recent council elections in Oxford. The great bulk of members are resident in Iffley and the immediate area. We can therefore consider it as a fair reflection of local opinion in Iffley. Respondents were offered five options around a range of questions – strongly agree, agree, neither agree nor disagree, disagree and strongly disagree. Only 12 per cent agreed or strongly agreed that there should be housing development on the Horse Fields. 79 per cent strongly agreed or agreed that the Horse Fields contribute to Iffley’s rural character and should not be used for housing. 92 per cent strongly agreed or agreed that this development posed serious problems for traffic and parking.

There are already 120 new housing units being planned in and immediately adjacent to Iffley, at Court Place Gardens, owned by the University of Oxford, and at the Country Council site at Iffley Mead. This is a huge increase in density for this small area. Neither of these is in the Conservation area and both are brown field sites. Both sites that are being developed in Iffley could include more than twelve additional social housing units. Friends of Iffley Village have agreed to these developments, in recognition of city housing needs. But they have argued strongly to preserve the green fields within the conservation area and develop them for biodiversity, aesthetic reasons and enhancing the Quiet Route through Iffley.

Iffley attracts a large number of recreational visitors as well as recreational walkers, runners and cyclists from around the city – about 900 passed a point in Meadow lane adjacent to the fields, according to a one day count in 2020. This is a part of the Quiet Route which is already sometimes packed with parked cars. Any housing development, implied by inclusion in the local plan, will result in further parked cars. The land involved should be accessible for walkers and runners and enhance the Quiet Route.

All of the council documents, place great emphasis on consultation and on active, vibrant communities. Our experience in Iffley is that such commitments have not been followed in practice and active, vibrant communities are not in fact welcomed when the great majority of them object to a Council planning development. Before it does anything else in the area the Council and all of its planning agencies must engage openly with the community.

The protection of green spaces in conservation areas within the city is linked to the development of attractive hubs beyond the ring road, also with access to

green space, where substantial employment opportunities already exist, where hundreds of houses are already being built and thousands are planned. There are also many brown field sites (over 80 are listed on the Council webpage) outside conservation areas. There are many other strategies for provision of housing within the ring road such as control of buy to let. Newspaper reports suggest that Oxford is one of the most favourable places for buy to let in the country.