

Response from Bioabundance Community Interest Company – Matter 1

Procedural/legal requirements Issue

Q1. Has the preparation of the Local Plan been in accordance with the Local Development Scheme in terms of its form, scope and timing?

The Local Development Scheme states:

'It is an aim of the City Council to improve dialogue and consultation throughout Council processes. This is explained in the Oxford Council Strategy 2020-24 <http://occintranet/about-the-council/council-strategy>'.

Unfortunately this link produces a message "Hmm. We're having trouble finding that site." This makes it difficult for a Community Interest Company to ascertain whether it is by policy or lack of policy that the consultation by Oxford City does not seem to have taken account of the views of members of the public living outside the City boundaries but whose communities would be directly affected if, what they might consider to be a misguided plan, comes into fruition.

Q2. Have requirements been met in terms of the preparation of the Local Plan, notification, consultation and publication and submission of documents?

Presumably, the Inspectors will decide whether the lack of publication of an Oxford Council Strategy 2020-24 on the web is a fact to be noted under this question.

Q3. 3. Has the preparation of the Local Plan complied with the Statement of Community Involvement?

Presumably, the Inspectors will confirm that the consultation process has included members of the public living outside the City boundaries but whose communities would be directly affected by the plan.

Q4. How does the Local Plan relate to Neighbourhood Plans and how would they be affected by the adoption of the Local Plan?

Oxford City's plans to try to export housing development to other Districts in Oxfordshire, contrary to their local plans.

Q6 How has the Sustainability Appraisal (SA) informed and influenced the preparation of the Local Plan at each stage and how has it been recorded/reported?

The impact of Scope 1, 2 and 3 emissions from the proposed house building plans has not been assessed against the County's net Zero targets. The draft Oxfordshire Net Zero Route Map & Action Plan Final Report directs us to 'embed climate change into decision making across Oxfordshire's local authorities'. This is especially relevant to plans to build houses and to build roads where the scope 1, 2 and 3 carbon emissions must be calculated and minimised. A close watch must be kept on the Scope 3 carbon emissions from building homes as well as construction methods to reduce the Scope 1 and 2 emissions during occupancy.

There are other approaches to increasing the number of homes within the city and surrounding districts. Much of the predicted population growth, whether it be the inflated numbers proposed by the Contractor, Cambridge Econometrics, or smaller numbers based on other more up-to-date projections, may be accommodated by increasing the number of people who live in existing buildings and encouraging conversions and extensions to achieve this. Where new builds are required, these should be from the less well-off and smaller in size to reduce the carbon impact. There is no reason why Oxford city should not provide the total number of homes required by building high-rise multi occupancy buildings on brownfield sites within the City boundaries.

Q7a How and when were options considered for the overall scale of housing and other growth

Need Not Greed Oxfordshire has already queried the methodology used by Cambridge Econometrics to calculate numbers. The decision to reappoint Cambridge Econometrics after the failed Oxfordshire Growth Board plan and the tendering process were also queried. There is concern that the tendering process to appoint Cambridge Econometrics to calculate housing needs was inappropriate when their methodology had been highly criticised in the failed OGNA previous plan. Only two out of six districts were involved in this process;

The scenarios developed by Cambridge Econometrics on behalf of the ambitions of Oxford city and Cherwell District council are based on the outdated premise of growth whatever the long-term cost. A completely different mindset is required in order to develop scenarios to protect the well-being of future generations. More Census data is becoming available since the report was produced, for example, details of the student population; Cambridge Econometrics' reasons to use their own approach rather than the standard method for calculating housing need does not seem to be valid for Oxford City and definitely not for the other Districts. Even the standard method can overestimate the need. It is only advisory and not mandatory in future. Local constraints must be taken into consideration.

Q7b . The distribution of development

Oxford's ambitious housing needs should be restricted to what can reasonably be built within the City boundaries rather than assuming they can strong-arm the surrounding districts to take their overflow. There is plenty of room within the boundaries of Oxford city to build high-rise multi occupancy homes.

Q7c. Potential site allocations

Work does not appear to have taken place to identify possible sites for multi occupancy multi-purpose buildings where the infrastructure for daily living is already in place

Q7d. Policy approaches

The Oxford City plan appears to be driven by a GDP measured Growth agenda based on 20th Century economic principles rather than the latest National Planning Policy Framework requires local authorities to deliver enough **homes**, build a strong economy, **support non-car travel**, **protect the Green Belt**, support good design, **deal with climate change, and protect nature** and heritage.

Q8. Were all reasonable alternatives considered?

Work does not appear to have taken place to identify possible sites for multi occupancy multi purpose buildings where the infrastructure for daily living is already in place.

Q9. Overall, has the methodology for the SA been appropriate?

The methodology for the SA is not appropriate to face up to the problems of climate change and lack of affordable homes within the Oxford City boundaries.

Q10. When and how was the Habitats Regulations Assessment (HRA) for the Local Plan carried out and reported?

The Oxford HRA puts business development ahead of the need for homes in the City on the assumption that any unmet need for homes may be exported to surrounding districts necessitating commuting into the City, development of new infrastructure and despoiling the countryside.

Some sites are within the City and the policies have the potential to have an impact on the following within the City: Water Quality; Balanced Hydrological Regime; and Increased Recreational pressure. The assessment does not mention similar impacts of development in the countryside surrounding Oxford within the boundaries of other districts.

Q11. Was the methodology appropriate and robust, and is the evidence sufficiently clear to justify the conclusions?

No; The assessment does not mention similar impacts of development in the countryside surrounding Oxford within the boundaries of other districts.

Q14. Is the Council's position justified?

No. The focus must shift from short term economic activity to the wellbeing of present and future generations.

Q15. Given that the Council identifies a significant amount of unmet housing need, to be accommodated by other authorities, how has this been taken into account in the HRA? How does this affect the issue of "in combination" effects?

Oxford's total need for homes could be met by developing multi-occupancy multi-purpose buildings in brownfield sites. The analogy of a cruise ship could be used to work to truly affordable and desirable homes in environments where everything the inhabitants need is within 5 minutes' walk.

Q16. Are there any other concerns regarding the HRA and if so, how have these been resolved?

It won't work without the support of the other Districts in the County

Q17. Does the Local Plan include policies in relation to the mitigation of and adaptation to climate change? If so, which?

The approach used is unsatisfactory as it does not include the full impact of Scope 1, 2 and 3 carbon emissions in all policies. When this is put in place, it will show that the City's development plans are incompatible with its targets to reach net zero. The need to insulate the existing housing stock and generate local heat and power is inadequately covered.