POETS
Planning Oxfordshire's Environment and Transport Sustainably

Oxford City Local Plan 2045

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Comments by POETS (Planning Oxfordshire's Environment and Transport Sustainably)

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1. POETS have fundamental and long-standing concerns about the very significant imbalance that exists between the high number of jobs in the city and the much lower number of economically active residents. This has led to many problems including high levels of commuting into the city, traffic congestion, a shortage of housing and very high housing costs which exacerbate inequalities.

2. We consider the local plan strategy of meeting all identified employment needs arising within the city while exporting its unmet housing needs to greenfield sites in neighbouring districts is not sustainable and is not an appropriate strategy. Although the plan purports to have a flexible approach to supporting housing delivery on employment sites, it appears very reluctant and is highly constrained. It is likely that the current jobs:housing imbalance will increase over the plan period, and encourage car use, worsening traffic congestion, road safety and environmental problems. It will store up problems for the future with no effective ways of solving them. The strategy is not consistent with NPPF, para 111 a) as it fails to support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. Neither is it consistent with NPPF, para 8 on sustainable development, which seeks a range of homes to meet the needs of present and future generations.

3. POETS consider the local plan is skewed in favour of encouraging employment and fails to give sufficient priority to providing housing, particularly much needed social housing for rent. It should be modified to give greater priority to providing housing, for example, by
   i. removing the objective to provide the conditions for Oxford to meet all identified employment needs arising within the city to 2045 - an additional 412,460m^2 of

employment generating floorspace. This is not necessary or appropriate given the potential for very significant job increases on land in and close to the city. The Oxford Growth Commission's Interim Report, for example, gives an indicative job potential of 25,000 in Oxford Central and West End, 15,000 around the Cowley branch line, 8,000 around Oxford, Kidlington and Parkway Station

ii. reducing the number of key employment sites in Appendix 3
iii. making some site-specific allocations for housing on all or part of current employment sites – this could include, for example, land at the ARC site, the Science Park, and in Oxford's West End, Osney Mead and Botley Road areas
iv. amending policy E1 which appears to support the loss of employment floorspace to support housing delivery, but on key employment sites the loss must be fully justified, the employment use maintained and the number of jobs retained (criteria f and g). This is too inflexible and given the jobs:housing imbalance is not appropriate
v. similarly, for other (i.e. non key) employment sites, E1f) indicates that the employment use should be maintained. This is inflexible, inappropriate and should be deleted
vi. amending policy S1e) which indicates that housing is only a priority away from current employment sies
vii. removing employment as an acceptable use at Slade House (NHS) and part of Thornhill Park as there are no business uses on the sites and they do not meet the criteria for new employment development
viii. naming residential as an acceptable use on the Ozone Leisure Park (SPS13) and the Unipart site (SPS17) particularly if redeveloped in association with the Northfield strategic housing allocation in SODC's local plan
ix. increasing the minimum number of homes to be provided; on some sites it seems very low – for example Ruskin Field has a minimum of 28 homes on 3.5 ha and is the only use proposed.

4. POETS also consider that the transport strategy fails to give sufficient priority to sustainable transport modes as required by NPPF paras 115 and 117. Major changes to promote active travel and high-quality public transport are essential if Oxford isn't to strangle itself in traffic congestion and poor air quality. The transport policies should be more forward thinking and consistent with national guidance. In particular

i. the objective relating to transport (para1.6, 4th box relating to a liveable city, 4th bullet point) should be made stronger by referring to 'prioritising the use of public transport and sustainable modes *over* the use of private vehicles and making sustainable travel the natural first choice' and working with others to reduce congestion

ii. the policy on transport assessments (C6) should be made more robust as follows
- at the end of the first sentence add 'as soon as possible as the development proceeds and measures have been taken to ensure the need to travel by car is minimised'
- the references to pedestrian and cycle movements and public transport should be higher up the list of factors to be considered - they should be a) and b) not c) and d)
- in existing d) after 'access to high quality public transport is facilitated' add 'and, where appropriate, funded for a specified period'
- the policy should also refer to the provision and maintenance of car clubs

iii. the policy on motor vehicle parking design standards (C8) should encourage low traffic neighbourhoods and car-free developments (as well as low car developments). The council should be proactive and identify sites for car-free development

iv. the policy on electric vehicle charging points (policy C9) for new build non-residential developments seeks only 10% of parking spaces to have EV charging. Yet the current level of EV ownership is almost 17%.

5. The housing, employment and transport policies do not provide an appropriate strategy for achieving sustainable development that addresses climate change consistent with national policy. Unless it is modified as suggested above, the draft local plan fails two of the four tests of soundness set out in NPPF, para 36.