



# Sites and Housing DPD Preferred Options: Response to consultation.

To:  
Oxford City Council  
Planning Policy Team

Dear Sirs,

Please accept this as the response of the Oxford Civic Society to the consultation currently being undertaken into the proposals for 'Preferred Options' for site allocations.

In regard to the consultation process itself, we have several specific concerns:

1. the questionnaire format promoted for responses is simplistic and inappropriate for reasoned representations, and that the acceptability to the Planning Policy Team of plain text submissions is not adequately made clear. Thus, genuinely constructive comment by consultees is likely to be hampered and frustrated.
2. In presenting the results of the consultation, full details of the submissions by consultees should be readily accessible for viewing by everyone, not simply summarised, abbreviated and fragmented, and not obscured by display only in committee papers, for example.
3. Where consultees' proposals, suggestions or comments are not pursued, the arguments for not pursuing them should be presented, together with evidence that due consideration has been given. Item 1 in the FAQs section of the consultation papers asks whether any notice will be taken of consultees' comments, and the answer is a categorical 'yes'; however, in the listings in Part B: Site Allocations of the consultation paper, although comments received in the previous public consultation are summarised, it is clear that they have mostly not been accepted in determining the 'Preferred Option' of the City Council. This appears to contradict the response provided to the relevant 'FAQ'.
4. It is evident that in a small number of cases sites listed in the Preferred Options papers have only been introduced since the previous round of consultation. These sites have received little publicity, and local communities in particular have not been well informed of the introductions, with consequences for the effectiveness of the consultation, and for the development of resentment and cynicism. This is counter-productive, and in these circumstances, greater efforts should have been made to inform and engage affected communities.

Comments on particular Preferred Options are as follows:

## **Part A: Housing Policies**

### General comments

None of the policy headings provided adequately recognises the problems of traffic and transport which have become steadily greater with incremental development of the city, and which have now reached a level which compromises the quality of life in certain areas. There is no dedicated policy which relates development to its effect on existing communities through traffic generation and parking, and the Sites document likewise fails to assess the acceptability of the suggested development of any of the sites in terms of access and transport.

### Design, character and context

The policy wording should be amended to make clear the specific order of priority as between pedestrians, cyclists, buses, motor vehicle access and parking. Consideration of cyclists' needs, and the encouragement of cycling should be mandatory, in recognition of the unusual levels of cycling in Oxford, the desirability of this, and the likely increase in cycling in the future.



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The policy should define better what constitutes 'open space', so that it cannot be interpreted to include, for example areas on which formal, or informal parking may take place.

We would support the proposed 'Preferred Option', subject to the following inclusions:

Developments should be designed to comply with the guidelines provided in 'Manual for Streets 1 & 2', as published by the CIHT.

Applications for Planning consent should include information sufficient to enable proper consideration of the scale and context of the proposals.

### Residential garden land

The Preferred Option is supported, but the policy wording should introduce a recognition of reasonableness or significance in judgement of impact on privacy; it is unlikely that any development, anywhere in the urban environment would have literally no impact on privacy or amenity of neighbouring properties.

### Energy efficiency and natural resources

Consideration should be given to making the requirements applicable to smaller developments, below the proposed threshold of 10 dwellings. The requirements should be introduced as soon as possible, regardless of national regulation amendments.

### Protecting existing housing

The Preferred Option (Option A) policy wording should be amended to include the list of specific uses listed in Option B. This provides clearer guidance on what uses might, or might not be acceptable, rather than the vague 'compatible' criterion suggested in point 3 of the current wording.

### Internal dwelling space

The wording of the Preferred Option policy should be amended to provide a clearer definition of what ceiling height, is considered 'adequate', and over what proportion of the floor area of a dwelling, it is required.

### Outdoor space

The Preferred Option would be supported for providing specific requirements on outdoor space, however, the policy as currently drafted is almost unintelligible. Apart from the difficulty in deciphering what the actual rules require, the wording is vague in defining terms such as 'adequate', 'private', 'defensible', 'shared', or 'private shared'. Even the term 'outdoor space' is inadequately defined, so that, for example, it is unclear whether it may be acceptable for this to include areas for parking cars.

### Living conditions (privacy and daylight)

The Preferred Options would be supported, but the preamble text refers to the aim of providing a 'clear and user-friendly set of criteria'; the policy proposals fail to live up to this objective!

### Student accommodation

The Preferred Option would be supported, however, it fails to include any requirement that student occupiers should be prohibited by their institutions of study from keeping cars, as referred to in the discussion text. The practicality of enforcing such a ban requires investigation, and planning policy should aim to exploit any opportunity to preclude car ownership anywhere at or in proximity to student housing development.

Planning policy should also stipulate the detail of the management regime referred to, and require that it be provided by the institution at which the residents are pursuing studies, to ensure realistic controls on the behaviour of the residents.



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## Houses in multiple occupation

The Preferred Option is probably the most appropriate, however, more consideration should be given to the situation of low-income non-student residents, for whom housing options are limited, and whose financial position may be less favourable than for students, since loans are less available or appropriate, and exemption from Council Tax may not apply.

## Key worker housing

The consultation document is ambiguous, in that it refers to a proposal to delete from the Local Plan any policy relating to key worker housing, but then proposes a Preferred Option for a definition of 'key worker', 'for the purposes of the policy options set out below'. The Preferred Option then states that the City Council would 'set out its support for key worker housing schemes ...'. In the apparent absence of any policy on key worker housing, it is unclear why a definition of the term is necessary, or how 'support' for such schemes might be provided. We would suggest that more consideration should be given, and that the inclusion of a specific policy relating to key worker housing would provide better clarity. Key worker housing might well include developments within a particular employment enclave, in which affordable housing (i.e. housing reserved for low-income occupiers generally, not necessarily employed as key workers) would be inappropriate; thus it may be considered appropriate for a financial contribution to be required of developers, to facilitate provision of affordable housing elsewhere.

## **Part B: Site Allocations**

2a Allotments Abingdon Road: we would be supportive of the Preferred Option to avoid allocation and delete the Local Plan policy designation.

5 Allotments at East Minchery Farm: any allocation should take account that there is an increasing demand for allotments, inadequate supply, a waiting list at many locations, and a high probability of further increases in demand. A designation which precludes the possibility of a future return to allotment use should not be made without serious consideration of all factors, including local alternative facilities, and local opinion.

17 Between Towns Road: the comment that it is impossible to allocate the site as whole, owing to the small size of one of its component sites is implausible. The allocation procedure should adopt a sensible approach to a holistic designation in cases such as this where contiguous components together form a single significant site.

31 Canalside Land, Jericho: the Preferred Option is strongly supported, since this is consistent with the findings, not only of the City Council Planning Control officers in refusing previous applications for consent, but with those of the Inspectors conducting subsequent appeals. The formal allocation should make specific reference to the elements considered important in any development on this site, namely the re-establishment of an active operational boatyard, creation of significant open space, and the provision of a pedestrian and cycle bridge across the canal.

43 Cowley Marsh Depot: allocation for student housing, whether on the whole or part of this site should be avoided, since many areas served by Cowley Road have already had their character compromised by too high a proportion of student occupiers, and Cowley Road has inadequate provision for cycle traffic, with little prospect of improvement.

49 Diamond Place and Ewert House: the Preferred Option allocation for this site is appropriate, but with the stipulation that the success of the Summertown community and local centre, including the retail and sports facilities, may be adversely affected unless careful consideration is given to the retention of car parking



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(possibly underground), including during the construction phase of any development. This is particularly relevant in light of the extent of the Controlled Parking Zones in the area.

54 East Oxford Bowls Club: the Preferred Option is supported, but the importance of the Bartlemass Conservation Area should be recognised, and any development carried out with appropriate sensitivity, as endorsed by recent decisions of Planning Inspectors.

56 Elsfield Hall: in reviewing options for the allocation of this site, there is no evidence of any consideration of the adopted Core Strategy policy relating to the development of the Northern Gateway site, some 600m west of the site, as an employment site. Likewise the previous designation as a Protected Key Employment site pre-dates the development of the Core Strategy, and would seem to be obsolete. In any event, the priority for the provision of housing, together with the currently unsatisfactory ratio of homes to jobs would suggest that allocation exclusively for housing should be appropriate.

59 Faculty of Music the Preferred Option is supported, but with the proviso that demolition of existing buildings should be precluded, in recognition of their contribution to the character of St Aldates and the Christ Church Memorial Garden.

61 Former Bartlemas Nursery: the Preferred Option is supported, but extreme sensitivity to the character of the Bartlemass Conservation Area and to adjacent listed buildings is necessary

69 Garages and Land East of Warren Crescent: allocation of this site is impossible until adequate biodiversity and hydrological studies are completed. Following this, if any development is found appropriate, it should be small-scale and of low density.

74 Harcourt House: student housing is the only appropriate use for this site, which should be specifically allocated to Oxford Brookes University.

75 Headington Car Park: no loss of car parking should be permissible, with additional provision considered, possibly underground. Student housing for this site is NOT appropriate.

76 Headington Preparatory School: any developed here should be subject to the submission of an acceptable Travel Plan and adequate provision of drop-off facilities which avoid the creation of traffic congestion on nearby roads.

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94 King Edward Street and High Street: the Preferred Option is supported, but any development should recognise the critical importance of the existing buildings to the character of High Street and this area of the city centre.

113 Lincoln College Sports Ground: the Preferred Option is supported, but the sensitivity of the Bartlemass Conservation Area must be recognised in any development proposals.

114 Littlemore Mental Health Centre: the Preferred Option is supported, but with the suggestion that key worker housing associated with the health care development should be allowable.



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116 Littlemore Mental Health Centre – Field at rear: we can see no good reason why the allocation in the current Local Plan should not be continued; the site appears unfavourable positioned for housing, being contained between the extremely busy road and a railway with potential for increased traffic.

118 Littlemore Park: the preferred Option is supported, with the proviso that the allocation should continue the restriction of use to science and technology-based enterprises.

137 Oxford Business Park: the Preferred Option is supported, but the present poor levels of bus services should be improved, and less provision made for car parking.

139 Oxford Science Park: no cogent argument is presented for allocating this site for more general B1 employment use; the current housing/jobs ratio suggest that there is no urgent need to provide more general employment sites, hence we would favour continuing the restriction of use to research and development.

141a Oxford University Press Sports Ground: it is unsatisfactory that there was no public consultation on the allocation of this site prior to the development of the Preferred Options proposals, owing to its late identification. Any allocation of this site should be considered in conjunction with that of the contiguous site 59a Five Mile Drive Recreation Ground. The allocation of this site should also consider the proposals for the strategic site at the Northern Gateway, which does not appear to have been done.

142 Park Hospital Site: the Preferred Option is supported, but consideration may be given to the development of key worker housing in addition.

143 Paul Kent Hall: the Preferred Option is supported. This site is eminently suitable for its current purpose as student accommodation, and demolition of the relative new buildings would be reprehensible. More effort should be put into improving the suitability of the site by the creation of a dedicated cycle route to Oxford Brookes' Gypsy Lane campus via Massey Close and Roosevelt Drive.

163 South Parks Depot: this site is in an area which retains special characteristics, and any allocation which might compromise this should be rejected. The Preferred Option gives no assurance that the character of this area would not be adversely affected, and we would suggest that consideration be given to re-location of the depot elsewhere (if required; if not, allocation of a less sensitive site for housing, and the return of the current depot site to open space.

171 Temple Cowley Swimming Pool: as noted, there is strong public opposition to the closure of the pool and the loss of a well-loved facility. No allocation should be made which might compromise the continuing existing use. As site owners, the City Council should be responsive to the local community views. In any event, allocation should not be for student housing, which would be inappropriate at this location.

179 Union Street Car Park: the Preferred Option is supported, but there should be no loss of parking, and consideration given to temporary arrangements during any construction.

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