

Bartlemas Action Group (BAG) comments on the Oxford Local Plan 2036 – Preferred Options

August 2017

This response from the BAG is in two parts – Comments on specific site allocations (p 129 onwards) followed by comments on earlier parts of the preferred options document.

Part 1 - Comments on site allocations

026 Jesus College Sports Ground

Reject for development. This is a sports ground and any development would have an adverse effect on the setting of the Bartlemas Conservation Area (BCA). Given that the East Oxford (EO) area is under-provided in terms of unrestricted access green space the site offers an opportunity for providing public access to private facilities. The site has been identified as a biodiversity network site by TVERC; any development is therefore likely to contravene preferred Option 53 (biodiversity sites).

032 Lincoln College Sports Ground

Reject for development. This is a sports ground and any development would have an adverse effect on the setting of the BCA and listed buildings. Given that the EO area is under-provided in terms of unrestricted access green space and sports grounds the site offers an opportunity for providing public access to private facilities. The site has been identified as a biodiversity network site by TVERC; any development is therefore likely to contravene preferred Option 53 (biodiversity sites).

346 Bartlemas Nursery Site

This is a site that should not be allocated as it is less than 0.25 hectares. In 2008 Oriel College stated on their 1st (rejected on appeal) planning application for 8 residential units/student accommodation (08/01736/FUL application form) that, including a stretch of its access lane, the site measures 0.24ha.

The minimum requirement is for sites to be 0.25ha/10 dwellings. It should therefore be on the rejection list, as it was last time in the 2013 Sites and Housing Plan, together with other such sites with less than the required developable area for 10 dwellings.

Further to its size below the minimum threshold, the site has further constraints:

- Its situation to the centre west within the tiny Bartlemas Conservation Area where it provides the setting of a green 'buffer' (BCA Appraisal) to the core of the CA preserving the western setting of its three listed buildings (Bartlemas Chapel Gd1, House and Farmhouse both Gd2*)
- Its enclosed nature with a long access lane bordered on 3 sides by mature trees in neighbouring gardens and containing 2 significant mature trees (among others) in the present nursery garden to the north, plus 2 on its entrance neck
- Its access - its green hedged and treed entrance neck runs from the main site area between backs of gardens, into Evelyn Court, past tight by terraced housing frontages on to the difficult Cowley/Magdalen Road junction

Given these constraints, heritage and physical, it is clearly unsuitable to be included in this site allocation. Should the site be developed, we strongly feel it would only be suitable for a sensitive low-density development, restricted to one storey. Any other development would have a harmful impact on the core of the Bartlemas Conservation Area, destroying the unique character of the Grade 1 listed Bartlemas Chapel, the listed House and Farmhouse (both Grade 2*) and their settings.

Site 169 Bartlemas Close Allotments

Retain as an allotment as it is in full use and is a popular amenity. Furthermore, it has an important function in retaining the open rural character and setting of the Bartlemas Conservation area and its listed buildings.

Site 204 East Oxford Bowls Club

Retain as a sports facility. The site has an important function in retaining the open rural character and setting of the Bartlemas Conservation Area and listed buildings and their settings.

Site 263 Oriel Sports ground

Support retaining as a sports ground on the grounds it is Green Infrastructure and it contributes to the open rural character and setting of the Bartlemas Conservation Area and listed buildings and their settings.

Site 482 Oriel wood

Support the allocation for Green Infrastructure. It has been identified by TVERC as a biodiversity network site. Development is likely to contravene preferred Option 53.

Part 2 - Comments on Preferred Options Document

We reject the vision of Oxford City Council which supports economic growth by allocating further sites for employment. Oxford has almost full employment and roughly half of the ca 100,000 workers commute into the City. This jobs/housing imbalance has led to traffic congestion, air pollution and a lack of affordable homes and loss of green spaces. Oxford's number one priority should be to build more affordable homes for local people and to create strong and stable communities. We therefore recommend that employment sites are allocated for (affordable) housing at high density. Mechanisms should be found to minimise housing speculation, eg making local authority land available to community land trusts which are community led and community owned. We object to the development of the Green Belt.

Option 19: HMOs

Reject the preferred Option 19

Allowing the development of purpose built HMOs is not appropriate in our community. We need affordable and attractive accommodation, especially for families, so that people can settle in Oxford and help build stable communities. We reject more accommodation which caters for a

transient population; our East Oxford community is already unbalanced due to the presence of a large student population and transient professionals. Students and young professionals are very welcome in our community but the 2011 census figures for East Oxford confirm that our community's age distribution is out of balance; 39 % of the population in the St Clements Ward are aged 18-25.

We therefore support the current policy HP 7 in the Sites and Housing Plan (below) which restricts HMO concentration by not allowing more than 20% of HMO properties within 100 m length of street.

HP 7 Houses in Multiple Occupation

Planning permission will not be granted for any purpose-built house in multiple occupation (HMO). Planning permission will only be granted for the change of use of a dwelling in Use Class C3 to an HMO where:

- a) The proportion of buildings in full or part as an HMO within **100 meters** of street length either side of the application site does not exceed 20%.*

etc

We note that under 19B it says that the existing policy is based on no more than 20% buildings in HMO use within **200 m** length of street. This is not correct; the existing policy is based on 100 m length of street which we support.

Option 20: Linking the delivery of new academic facilities to the delivery of University provided accommodation

We reject the preferred option as it would lead to thousands more students living out than is currently permitted, 3,000 for each university.

Option 20A proposes to take postgraduate research students out of the threshold which would lead to thousands more students living out in the private sector, putting pressure on already limited housing and causing a substantial reduction in council tax revenue (over £1 million pounds per year) For example, in 2015/16 Oxford University reports that ca 5,900 full time students were enrolled on research courses with an anticipated growth of 2% per year.

We support the alternative Option B which is the current policy. We believe that the Core Strategy policy, which was approved in 2011, is sufficiently up to date and flexible enough to reflect the changes which have happened since. The Oxford Annual Monitoring report lists exemptions introduced since 2011 such as part time students, those paid for teaching and research, and those who work in hospitals.

The specific accommodation needs for graduate students were extensively discussed at the Sites and Housing Inquiry and then addressed.

We note that Oxford University and Oxford Brookes University have respectively 4,333 and 4,055 students (page 47 para 3.55) living in shared houses; these figures are based on HESA figures. We

note that the number of students living out is well over the 3,000 limit and many more than that reported by the Universities in the Oxford Annual Monitoring Report. Resident groups have repeatedly raised with the Council that the figures which the Universities submit to the Council are not reliable and should be independently verified, f.e by using HESA figures. We would like the Council to take action to ensure that the Universities comply with the policy making sure that university students live mostly in purpose built accommodation. This would allow many more much needed homes to be released for council tax paying Oxford residents; helping to make Oxford a more affordable place to live.

Option 21: New student accommodation

We support the preferred option (Combination of A & E) which is that new speculatively built student accommodation should be tied to students of Oxford University and Brookes University. It is a shocking figure that 2/3 of non-university students are accommodated in the thousands of private purpose-built accommodations which have been built over the last decade or so.

Regarding the location of student accommodation we would like the council to retain the policy as outlined in HP 5, including the list of main thoroughfares as described in the Sites and Housing Plan

Option 49: Managing the overall amount of Public Open Space.

We reject the preferred Option A which does not set an overall target for the total quantity of public open space across the city. We support Option B, the current Core Strategy Policy, which aims to maintain the existing ratio of accessible green space per 1000 population. Such a ratio would potentially allow an increase in the amount of accessible green space when the population increases, especially in areas which are already underprovided such as East Oxford and Headington.

Option 51: Playing pitches.

We reject the preferred option and support Option C which is a blanket protection of all playing pitches.

We need to retain our current sports pitches as there is currently a shortage in (cricket) pitches. Our local cricket team Southfield Superstars had to stop playing after more than 25 years as it could no longer play on Oriel Sports ground and was not able to find a replacement.

Over the current Local Plan period a number of sport pitches, in places such as Warneford Hospital, Barton Road, and off the Abingdon Road (now Hogacres Common) have been withdrawn and not replaced. Further loss should be prevented as Oxford needs to plan for recreational facilities for a growing and, in general, young population.

Option 55: Allotments

We reject the preferred option and support Option B which is a blanket protection of all allotments, except any sites that are specifically identified as surplus and allocated. Although Option B sounds very inflexible it is only so in respect of not losing allotments. There is no suggestion in either A or B that new sites will be created and we cannot afford to lose what we have. Those on the outskirts of the city will soon be surrounded by housing and will become more popular as the surrounding population increases.

Section 6: Enhancing Oxford's unique heritage and creating quality new development.

We do not believe that the Council's approach is adequate in protecting and enhancing Oxford's historic and unique environment and its green setting. We support the comments made by CPRE Oxfordshire in its submission. We are concerned that the recommendations by the Roger Dudman Way Review, set up after the Castle Mill debacle, and regarding Oxford's historic environment have not been followed up.