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Linda Griffiths
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Date: 18th July 2023
Your ref: 23/01233/OUT
My ref: 23/01069/CONSLT
Please ask for: Felicity Byrne
Telephone: (01865) 252159

Dear Mrs Griffiths,

APPLICATION: 23/01233/OUT

PROPOSAL: Outline application (with all matters except access reserved for future consideration) for the demolition of existing buildings and the erection of up to 800 dwellings (Class C3); a two form entry primary school; a local centre (comprising convenience retailing (not less than 350sqm and up to 500sqm (Class E(a))), business uses (Class E(g)(i)) and/or financial and professional uses (Class E(c)) up to 500sqm, café or restaurant use (Class E(b)) up to 200sqm; community building (Class E and F2); car and cycle parking); associated play areas, allotments, public open green space and landscaping; new vehicular, pedestrian and cycle access points; internal roads, paths and communal parking infrastructure; associated works, infrastructure (including Sustainable Urban Drainage, services and utilities) and ancillary development. Works to the Oxford Road in the vicinity of the site to include, pedestrian and cycle infrastructure, drainage, bus stops, landscaping and ancillary development.

AT: OS Parcel 4347 East Of Pipal Cottage, Oxford Road, Kidlington

FOR: Linda Griffiths

Thank you for giving us the opportunity to comment on the above application.

At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development which is stated to mean, unless material considerations indicate otherwise, approving development proposals that accord with the development plan without delay. It lists a number of core planning principles that should underpin decisions but points out in a footnote that there are other policies in the Policy Framework that indicate there



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may be a need to restrict development in order to protect designated sites, including designated heritage assets.

The NPPF reiterates the Government's commitment to the historic environment and its heritage assets which should be conserved and enjoyed for the quality of life they bring to this and future generations. It emphasises that the historic environment is a finite and irreplaceable resource and the conservation of heritage assets should take a high priority. Local Planning Authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets in considering a proposal and also desirability of new development making a positive contribution to local character and distinctiveness.

Local Plan and Development Brief

The Cherwell Local Plan Partial Review allocates this site known as PR6a for development. Most of the site was taken out of the Green Belt but approximately 16ha was not and is not proposed for any urban development. A Development Brief for the site was adopted in September 2022.

The proposed development differs from the Development Brief in that more dwellings are provided and the school is proposed in a central location adjacent to the local centre.

Housing

In relation to Housing paragraphs 60-62 of the NPPF make clear that land should be provided for housing and strategic policies should be informed by needs assessment providing and reflecting the size, type and tenure of housing needed for different groups in the community within planning policies. Specifically in relation to affordable housing, paragraph 62 makes clear that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless: (a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and (b) the agreed approach contributes to the objective of creating mixed and balanced communities. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups (paragraph 65). Local Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies (paragraphs 66-77).

In relation to Housing paragraphs 60-62 of the NPPF make clear that land should be provided for housing and strategic policies should be informed by needs assessment providing and reflecting the size, type and tenure of housing needed for different groups in the community within planning policies.

The urgent need for more homes and the constrained supply in Oxford is well documented and frequently features in the press and research studies. The constrained housing supply and increasing unaffordability of homes in Oxford have significant sustainability impacts for those living and working in the City.

The Oxfordshire Strategic Housing Market Assessment (SHMA) is the main evidence for housing need. It identifies the overall scale of housing need, as well as the mix of housing and range of tenures which the local population is likely to need in the 20 year period to

2031. The Oxfordshire SHMA 2014 covers the period until 2031, so a roll-forward was commissioned by the City Council in order to understand housing need to 2036. It used the same methodology and the most up-to-date household forecasts and re-calculated the implications of economic growth. The 2018 SHMA roll-forward to 2036 found that, in order to meet Oxford's affordable housing need in full, based on a policy of 50% delivery of affordable housing, 1,356 dwellings per annum would be required. The Oxfordshire Housing and Growth Deal with Government, signed by all of the local authorities in Oxfordshire in February 2018, commits the Oxfordshire authorities to work together to deliver 100,000 homes in the 20 year period to 2031.

The need for new homes for Oxford over the Oxford Local Plan 2036 period to meet affordable housing need and the commitments of the growth deal is much higher than the city can realistically accommodate within its administrative boundaries. There are very significant constraints on the capacity of the city – physically with the city's tight administrative boundary and Green Belt, and environmentally with large areas of national or international biodiversity interest and areas within flood zone 3b functional flood plain, as well as heritage and townscape considerations. The Oxford Housing and Economic Land Availability Assessment (HELAA) assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period.

In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of the SHMA figures due to these constraints. The SHMA shows that between 24,000 and 32,000 homes are needed between 2011 and 2031 to meet Oxford's housing need. Based on extensive evidence the Oxfordshire Growth Board agreed an apportionment of homes to be provided within each of the districts. This agreement was signed by all but one of the district councils. The assumed capacity for Oxford was 10,000 dwellings.

For Cherwell District Council this amounted to 4,400 dwellings. Cherwell Local Plan Partial Review: Oxford's Unmet Needs identified various sites within the district to provide these dwellings. Site PR6a was allocated at land to the east of Pipal Cottages, which is the subject of this outline application, for 690 dwellings.

We therefore welcome this outline application for up to 800 houses on this allocated site which will contribute towards the overall 4,400 dwellings agreed and in order to help meet the high housing needs of Oxford. In accordance with the Partial Review we consider that a minimum of 690 units should be recognized and identified as specifically being for Oxford City Council and meeting our housing needs (as opposed to Cherwell District Council's housing needs). This should be secured via a legal agreement.

Affordable housing

One of the biggest issues facing residents in Oxford as a whole is the unaffordability of homes, to rent or to buy. Oxford is one of the least affordable places in the country, resulting from a combination of high land values, reducing land availability, and a shortage of homes. This means that housing is so expensive in absolute terms and compared to average salaries, that many people are priced out of the market. As such, delivering housing that is affordable in Oxford is a key priority of the City Council to help ensure that Oxford is a sustainable and inclusive city.

In view of the 690 units specially meeting Oxford's needs, a minimum of 50% of the minimum 690 units on site should be provided as truly affordable homes for Oxford City Council to meet Oxford's need. This should be secured by legal agreement.

We would make the following specific comments in relation to affordable housing (on the basis that all matters relating to design and layout are reserved):

I. On site tenure distribution

The current design approach suggests three character areas. Oxford City Council seeks a pepper-potting approach to the distribution of the affordable units within residential developments to achieve more balanced community. Therefore all three character areas should be designed in accordance with this principle at reserved matters.

II. Tenure & Size mix

A minimum of 50% of the minimum 690 units on site should be provided as truly affordable homes for Oxford City Council to meet Oxford's need. 40% of this number must be social rented dwellings. The remaining element of the affordable housing may be provided as intermediate forms of housing provided that they are affordable in the Oxford market).

The affordable dwellings size mix should be in line with Policy H4 of Oxford Local Plan 2036 which seeks to ensure residential development delivers a balanced mix of dwelling sizes to meet a range housing needs and create mixed and balanced communities. This development would therefore be expected to provide the following mix of unit sizes for the affordable element, where feasible, in line with Policy H4:

1-bedroom: 20-30%

2-bedrooms: 30-40%

3-bedrooms 20-40%

4+ bedrooms 8-15%

Based on current Oxford City Council needs and findings within the Housing and Economic Needs Assessment 2022 (HENA (Cherwell District and Oxford City Councils)) all affordable units are expected to be General Needs (not options for older people). The County Council's comments on this matter are noted.

III. Units' layouts and accessibility

The contemporary unit layouts suitable for modern life-styles are welcomed. The units' sizes exceeding Nationally Described Spaces Standards are also welcomed. In relation to accessible and adaptable homes, 15% of general market dwellings should be constructed to Building Regulations Approved Document M4, Category 2 and 5% of the affordable units should be wheelchair accessible constructed to M4 Category 3 in line with Policy H10 of the Oxford Local Plan 2036.

IV. Sustainability and energy efficiency

We support the Applicant's intention to deliver the residential units to the full Future Homes Standards. These aspirations are in line with Policy RE1 of the Oxford Local Plan 2036.

S106 Obligation:

As the site is allocated to meet Oxford's housing needs, the City Council considers it necessary for it to be party to any S106 agreement and any future Nominations agreement for the affordable housing. It is acknowledged that details of any nominations agreement may not be agreed between the City Council and Cherwell District Council at the point of

writing and therefore we reserve the right to comment further on this matter if necessary.

We consider that the following should be within the Heads of Terms:

- A minimum of 690 units should be provided (either designated or allocated) to meet Oxford City Council's Housing needs in accordance with the Site Allocation PR6a; and
- A minimum of 50% of the minimum 690 units should be affordable housing to meet Oxford City Council's Housing needs in accordance with the Site Allocation PR6a; and
- Oxford City Council shall enter into an agreement with Cherwell District Council on the allocation mechanism for the minimum 50% affordable Housing in order to ensure households with a local connection to Oxford are nominated in order to meet the needs of Oxford.

Design, Heritage and Views

In relation to design the NPPF emphasises that high quality buildings are fundamental to achieving sustainable development and good design creates better places in which to live and work and helps make development acceptable to communities (para 124). New development should function well, be visually attractive, sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible and which promote health and well-being (para 127).

Oxford City itself is nationally important and a significant heritage asset. The rural setting of Oxford, the fact that it is "situated on a gentle eminence in a rich valley between the rivers Cherwell and Isis – the prospect bounded by an amphitheatre of hills." (Bradshaws Guide – 1866) is also considered to make an important contribution to its historical significance.

NPPF para 130 seeks that development amongst other things will "add to the overall quality of an area"; be "visually attractive as a result of good architecture"; and be "sympathetic to local character and history, including the surrounding built environment and landscape setting. The contribution of the landscape setting of Oxford to understanding the evolution of the settlement (historical value) as well as the contribution that it has and continues to make to the cultural life of the city (art, literature) is important. Historic England advise that "The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance." (HE GPA3).

The site is outside the designated view cones in Policy DH2 of the Oxford Local Plan 2036 which seek to ensure development would not harm views into and out of the historic core and our 'dreaming spires'. The development would nonetheless have an impact on the setting of Oxford and as such on this heritage asset. As the development directly adjoins the City boundary it is considered to be an extension of the City itself and therefore should directly relate to and respond the nature and characteristics of the City.

The submitted Parameters Plan and approach street hierarchy with key landmark buildings on corners is broadly supported (subject to detailed design considerations and assessments of views at reserved matters stage) with two exceptions:

- I. The Parameters Plan should be amended to make clear that the 'yellow' areas are

'two to three storeys up to 10m maximum in height'; The outer edges of the development should be 2 storeys with rooms in the roof to appropriately respond to the existing two storey housing within the adjoining Cutteslowe area and minimise impact in views from the surrounding landscape.

- II. New dwellings adjoining the Croudace Development (to the southwest corner of PR6a) should be restricted to 'two to three storeys and 10m maximum height' and therefore re-designated 'yellow' along this edge. This is to ensure an appropriate relationship to the two storey houses being built will be achieved. Where flats within the Croudace development adjoin PR6a then the designation could remain 'orange three storeys 11.5m height' (bottom south west corner of the Croudace Development).

The illustrative Masterplan is noted. Under reserved matters it is considered that the development should high quality that responds to the character of Oxford. Careful consideration must be given to the urban grain, massing, appearance and materials.

Transport

The City Council defers to Oxfordshire County Council as Highways Authority (HA) on highways matters. However, we would make the following comments:

Oxfordshire County Council and Oxford City Council are seeking a modal shift towards more sustainable modes of travel other than the vehicles in order to reduce traffic and improve air quality in Oxford. The site is in a sustainable location in close proximity to the Water Eaton Park and Ride, Oxford North Railway Station and with good public transport into and out of the City.

Highway Network

It is clear that the local road network would unlikely be able to cope with the additional vehicles generated by this development without the package of essential infrastructure, as set out by the HA in their comment, being secured, together with a considerable shift towards active and sustainable travel. This site is expected to partly fund the infrastructure package improvements (along with other Partial Review Sites). In addition the development will have a negative impact on the Cutteslowe Roundabout unless improvements to this roundabout are made. The City Council agrees that the infrastructure and improvements are essential and that without it the development would be unacceptable.

Parking

In view of the above and as the development forms an urban extension to the City, the scheme should seek to achieve parking standards set out in Policy M3 of the Oxford Local Plan and Appendix 7. The County Council state that the development would in future be within a Controlled Parking Zone (CPZ). In accordance with Policy M3 residential developments on greenfield land and in a sustainable location within a CPZ should be car free with provision limited to disabled users and car club spaces. However, it is acknowledged that Cherwell District Council has different parking standards. Therefore the City Council would be amenable to a blended parking standards provision which sets a lower parking provision per unit to be agreed at reserved matters stage.

Footpaths and Cycling

In order to facilitate active and sustainable travel and encourage a modal shift out of vehicles, the City Council supports the provision of a Cycle Superhighway along the main

Oxford Road between Kidlington Roundabout and Cutteslowe Roundabout. This will enable a faster and safer route for cyclists to the P&R, railway station and Kidlington. We also welcome the provision of other cycle routes through the site indicated within the Masterplan. We support the HA's request for a further access point for cycles into the P&R.

Cycle and pedestrian connections into the Croudace Scheme must be provided.

The cycle route connection into Cutteslowe Park is welcomed and the location has been agreed with the City Council at pre-app stage. The Applicant's Transport Consultants have also engaged with community groups, in particular Friends of Cutteslowe Park. The provision of a new cyclepath route through Cuttelsowe Park linking to the by-pass and to the existing 'quite route' cycle network at the south of the Park and into/out of Oxford City Centre (County Council's LCWIP refers) is considered vital to encourage existing and future residents within the City and PR6a to be active & travel sustainably meeting the County and City Councils' climate priorities and Active Travel plans and enable the significant modal shift needed in order to avoid an adverse impact on the highway network from this development. The connection is vital for those less confident at cycling providing a safe cycling route to and from Kidlington, Water Eaton P&R and railway station into and out of the City Centre through PR6a avoiding what are very busy and dangerous major roads. Active Travel England's consultation response is noted (para. 5.0) and supports the need for this link. As this cycle link is directly related to the development it is considered that a contribution of £320,000 towards the implementation of this new cyclepath through Cutteslowe Park to PR6a is justified and reasonable.

PRoW

It is imperative that the development connects the existing PRoW into the Croudace Scheme. However, your attention is drawn to the fact that the PRoW on the illustrative Masterplan may not be in the correct place. This needs to be discussed with Croudace at the earliest.

Ecology/Biodiversity

Our comment is restricted to biodiversity net gain, as we consider that insufficient information has been submitted to enable the Cherwell District Council to assess the proposals.

The PDF of the Biodiversity Metric 3.1 submitted indicates the proposed development will deliver an increase of 25.55 habitat units (+27.93%) and 17.75 hedgerow units (+60.49%). Our first observation is that the Biodiversity Metric 4.0 should be used, as the application was made after its release on April 20th 2023 and the latest version of the metric should be used at the time of submission. Also, the actual metric spreadsheet itself should be submitted, rather than a series of screenshots.

With regard to the content of the metric, while some information has been submitted to support the habitat characterisations and condition assessments made, there appear to be some omissions. The project ecologist should fully justify the choices made in the metric, with reference to the UKHab definitions and the relevant Condition Assessment Sheets, for both baseline and proposed habitats. We would raise the following issues with the metric include:

- The existing field margins should be categorised as such, rather than incorporated within the wider habitat of 'Modified Grassland'.

- Based on the description provided, the woodland is not monospecific or obviously a plantation, and therefore would be better categorised as ‘Lowland Mixed Deciduous Woodland’.
- Regarding the proposed habitats, if the other neutral grassland will be in a mix of poor and good condition, these areas should be separated in the metric, rather than an assessment of ‘fairly poor’ assigned uniformly.

Landscape

The approach to green infrastructure as shown on the Green Infrastructure Parameter Plan is supported. Significant existing trees and boundary vegetation appears to be retained and enhanced, which is welcomed. We would flag however that the area adjoining the northern boundary of the Croudace development that is designated for a play area and community gardens would abut the approved open space of that development. Whilst this is supported in principle there is indicated to be a substantial boundary vegetation belt along that boundary (an existing mature hedge currently exists and is retained). Substantial boundary vegetation would be undesirable if it forms a green wall barrier to integrating the two greenspaces of the developments. There is also an existing watercourse through this designated area. Careful consideration is therefore needed.

Leisure

The residents of the new development will benefit from existing leisure facilities within Oxford City and in particular Cutteslowe and Sunnymeade Park adjoining the site to the south, owned by Oxford City Council. This park provides, amongst other things a cricket field & football pitches and tennis courts and two pavilions. The existing cricket pavilion adjacent to the boundary with PR6a needs improving to better cater for users’ growing needs and girls sport. Oxford City Council’s Green Spaces Strategy (2013-2027) aims to achieve high quality green spaces accessible to all and through Objective 8 seeks to improve the quality of the parks’ pathways, fences, pavilions and toilets. Sport England Uniting the Movement is a collective effort with tackling inequalities at its heart believing that every person should have an equal chance to benefit from living an active life set within their Implementation Plan 2022-25. It is known that the sports facilities that should be provided on PR6a set out the Development Brief will now be provided on PR6b site. However, when this will be delivered is unknown and in the meantime PR6a residents will use Cutteslowe and Sunnymeade Park facilities. In line with Sports England Implementation Plan 2022-25 to level up inequalities and build a more active and equal nation and Oxford’s Green Spaces Strategy, a contribution of £200,000 to upgrade the cricket pavilion to appropriately provide for girls sports and the growing needs of the cricket sports community in the area is considered justified in this case.

Archaeology

The Green Infrastructure Parameter Plan has sought to preserve the prehistoric/Saxon barrow site. As the application is located beyond the Oxford Local Authority Area (LPA) we defer to the advice of the County Archaeological Service. The impacts within the Oxford LPA are, based on present evidence, unlikely to have significant archaeological implication.

Primary School

The proposed location for the school more centrally with the site and close to the local services Centre is wholly supported. Whilst this differs from the Development Brief, we consider that the location is preferable. Children from within the adjoining area in Oxford City

and the PR6b development who would be in catchment for this school would be closer to the school. This would encourage walking and cycling to school and enable the shift towards active and sustainable travel, which is crucial for there to be no adverse impact on the highway network from additional traffic movements generated, as set out in comments above.

Local Centre

The central location of the new local centre and community hub is supported. Again distance to nearby existing and future residents would be best served by this location, enabling active and sustainable travel.

We would welcome the opportunity to further discuss any of the issues raised and comment further if necessary.

Oxford City Council Planning Department promotes email correspondence as it is the quickest, easiest and most environmentally friendly way of contacting us.

Contact us at planning@oxford.gov.uk

Yours sincerely,

Felicity Byrne

Principal Planning Officer, Major Project Team
Development Management

For and On Behalf of

David Butler

Head of Planning Services