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Date: 19/12/2014 14:40
Subject: Local Plan 2031 Part One

I have the following comments on your Local Plan review, relating to two key issues.

1. The housing figures.

As a basis for the review you have accepted without question the housing figures contained in the Strategic Housing Market Assessment, despite the fact that this Assessment has been widely criticised on a number of grounds, including its uncritical use of proposals for significant employment growth in the Oxford area as an input to the assessment. Planning policies in the Oxford area used to be directed towards restricting further employment because it was recognised that such growth inevitably leads to pressures on the City's limited housing resources and road network. As housing needs in the City have now reached their highest level ever, and as the area's road system is near to breaking point, planning to encourage further employment growth seems perverse and very ill-advised.

Whether employment in the area does actually increase to the extent that the City Council wants will be dependant on a number of factors and therefore must be open to doubt, but the release of land for housing based upon these projections will not be reversible once made. It is short-sighted for your Local Plan review to accept without question the figures in the SHMA, and a much more cautious approach is needed.

You will no doubt say that you have little option but to plan for the SHMA forecasts because of the Local Plan Inquiry process, but Councils should be confident in arguing a case for a reduced figure given the wide range of uncertainty involved in the exercise. All Local Plans are open to review should circumstances change.

2. The Oxford Green Belt.

You have carried out what you call "a local Green Belt review" and, as a result, are proposing to take areas out of the Green Belt for new housing or as "white land", but you also accept that there may well need to be a further and more comprehensive review of the Green Belt carried out with adjoining authorities. Oxford City Council, with its expansionist plans for a greater Oxford, will certainly be pressing for this. Given the very clear advice in the NPPF that, "Once established, Green Belt boundaries should only be altered in exceptional circumstances " your "local" review seems difficult to justify. You seem to have concluded that exceptional circumstances exist now, but may well also exist again in a short time. This cannot be the right way to approach the sensitive subject of reviewing a Green Belt when the basis of national policy, from its inception, has been the permanence of adopted Green Belts. Your proposals to take land out of the Green Belt, as part of the current review, should be omitted from the Plan, as should the housing proposals within the current Green Belt.

The wording of the text of the draft review might, worryingly, indicate how you see the balance between protecting the Green Belt and accommodating development in the area. In para 5.5 (on the Abingdon and the Oxford Fringe Sub-Area Strategies) you say that the "over-arching priority is to maintain the service and employment centre roles of Abingdon and Botley ...etc. and to respect the overarching (sic) purposes of the Oxford Green Belt." Surely there can't be two "over-arching" priorities or purposes even if they are spelled differently? And it's interesting that, by Core Policy 8, the wording of this policy has changed to having only one "over-arching priority", which is effectively managing growth in the sub-area, while just "protecting" the Green Belt. I would welcome a rewording of the relevant policies and text to say unambiguously that the protection of the Oxford Green Belt is the Council's over-riding priority.

One final comment. When the Development Plan for Oxfordshire include an Oxfordshire Structure Plan, on every occasion when the SP was publicly examined at Inquiry the question of Oxford's future planning and of the Oxford Green Belt was endlessly discussed and argued. The Inspectors' conclusions always supported the aims and purposes of the Green Belt and one wrote firmly that "Oxford's growth should not be allowed to continue indefinitely". Local Government planners and politicians in the Districts around the City should bear that in mind.

Regards

Richard Whitlock