



**Meeting Date – 15 November 2022**

**Agenda item – 7a. Planning - To consider drafting a response for the Oxford Local Plan 2040 Preferred Options Consultation – draft response**

## **1. Introduction**

- 1.1. Eynsham Parish Council (EPC) welcomes the opportunity to respond to the draft Oxford Local Plan, given the huge impact that planning decisions made for Oxford City have for our Parish and that we sit alongside the Oxford Been Belt. Already our Parish will be the site for over 3000 new homes by 2010, driven partly by the spill-over of unmet housing requirements in the City.

## **2. Overview**

- 2.1. Eynsham Parish Council is disappointed that the Oxford Local Plan is not clear on the exact requirement for additional local housing required for Oxford City in the coming decades. Given that the City is unlikely to be able to meet its housing needs from within its own boundaries this means further uncertainty and doubt for potential recipient sites such as Eynsham Parish.
- 2.2. Given that an understanding of housing requirements would seem a pre-requisite of a Local Plan this omission in the view of Eynsham Parish Council disqualifies the legitimacy of the entire draft Plan. We would recommend that this consultation is withdrawn and a new Plan presented at a later date when the full details of where, when and how many new houses are required, and particularly Oxford City's proposals for houses located outside of the City boundary.
- 2.3. Eynsham Parish Council argues that this would allow for new economic evidence to be considered that would have a potentially major impact on the housing requirements of the City, especially the likely consequences of the failed mini-budget, the long recession, predicted by the Bank of England and the tax rises and public spending puts expected in the coming 17 November financial event.

## **3. Policy Options**

- 3.1. STRATEGIC POLICY SET S2: APPROACH TO GREENFIELD SITES

3.1.1. Eynsham Parish Council objects to the proposal within the preferred option that there should be a review of green belt land to allow potential development. Any further development of green belt undermines its value as a permeant protection of green space around the City and also encourages the potential for speculative development and further erosion in the future.

3.1.2. EPC believes that Oxford City should maximise the use of its brownfield sites and leave intact all current greenbelt land.

### 3.2. POLICY OPTION SET H1: HOUSING REQUIREMENT FOR THE PLAN PERIOD

3.2.1. EPC believes that Oxford City should seek to meet all its housing needs within the City boundary without the need for neighbouring districts to pick up the difference. This should be achieved by shifting sites from a business use to housing. A model whereby the economy of Oxford City continues to grow but can only achieve this by drawing in staff living in surrounding districts is unsustainable. It puts massive pressure on transport links such as the A40 and the Swinford Bridge in our Parish and reduces the quality of life for those who are required to commute into the City every day.

### 3.3. POLICY OPTION SET G4: DELIVERING MANDATORY NET GAINS IN BIODIVERSITY IN OXFORD

3.3.1. EPC objects to the preferred option which would require the minimum of 10% net biodiversity gain and supports the alternative option for a higher than 210% net gain. Nature knows no boundaries and so the argument that biodiversity net gain above 10% may not be achieved in the Oxford City boundary seems disingenuous, if the goal is to increase biodiversity, wherever that may be in the County. The draft Oxfordshire Nature Recovery Strategy provides a suitable guide to where increased resources from developers could be invested to increase biodiversity across the County if the gains can't be accommodated within the City.

### 3.4. POLICY OPTION SET G7: FLOOD RISK AND FLOOD RISK ASSESSMENTS (FRAs)

3.4.1. EPC recommends that Oxford City develops local Flood Risk Policy that requires developers to resource upstream management of risk especially in the upper catchments of the River Thames. The biggest opportunity to mitigate flood risk is to hold water up before it reaches the City and this can be done through Developments paying for upstream improvements in natural flood management.

### 3.5. POLICY OPTION SET R1: NET ZERO BUILDINGS IN OPERATION AND R3 RETROFITTING

3.5.1. EPC welcomes Oxford's City's ambition for net zero in its building stock, both in new build and retrofitting. Given the huge increase in existing and planned solar developments on farm land around Oxford, EPC would like to see energy policies that incentivised the maximum use of residential and commercial building roof space for solar panels across the City.

### 3.6. POLICY OPTION SET R6 WATER QUALITY

- 3.6.1. EPC supports Option B for the City to develop a bespoke policy on water quality. Within this policy the City should recognise that water quality issues are generated many miles away from the City in terms of single point sewage pollution and diffuse agricultural pollution and should be prepared to shift resources from the immediacy of the City to take a whole water catchment approach to managing water quality.