

Cherwell Local Plan 2011 – 2031 (Part1)

Partial Review – Oxford’s Unmet Housing Need

A Response from Oxfordshire Green Party & North Oxfordshire Green Party

10th October 2017



General comments

Reading the Cherwell Local Plan 2011 – 2031 (Part1) Partial Review – Oxford’s Unmet Housing Need document (hereinafter referred to as the Review Document or Partial Review Document) and supporting evidence for these proposals it's difficult not to conclude that they are simply a construct intended to justify something that is unjustifiable.

There is very little direct evidence offered within the proposal document aside from oblique references to supporting studies, a number of which also contain data that directly contradicts the assumptions underpinning the review. There is a clear practice of 'cherry-picking' and reliance on half truths. Further evidence for this will be shown below.

In other areas of the proposal document there are outright contradictions with its own position. Again this will be discussed further below.

Moreover there is a specific thread that runs through the proposal document that suggests that this is in fact not even a review as stated in the title.

(Policy PR3) states one of the aims of the review is to *"exceptionally allow for development in the Green Belt having considered all other reasonable options and the vision and objectives we need to achieve"*

Yet there are numerous references throughout the review document justifying the proposals by virtue of them not *'undermining'* the original local plan submitted by the council in 2015. This hardly confirms that all other options have been properly considered.

For example paragraph 1.4 states :

"The Partial Review is a positively prepared Plan. It avoids undermining the existing Local Plan's development strategy"

Paragraph 2.2 Section 3 refers to ensuring :

"that the required homes are viably delivered by 2031 in accordance with cross-boundary strategic priorities and so that the vision and objectives are achieved without undermining the existing Cherwell Local Plan (2015)"

While 5.10 states :

"Our strategy for meeting Oxford's unmet needs seeks to avoid undermining the strategy of the existing Local Plan (2015) and the delivery of planned growth at Bicester, Banbury and Former RAF Upper Heyford"

And 5.20 warns :

"Development must not adversely affect delivery of the strategy for meeting Cherwell's needs in the existing Local Plan (2015)"

This theme is repeated throughout the document and seems to equate the principles of review with the action of *'undermining'* previous plans and proposals. This hardly sets the scene for a genuine intention to leave no stone unturned when looking at ways of finding additional capacity.

Indeed it's clear than few, if any, of these original proposals and sites in the 2015 plans have been revisited here. The overriding priority seems to be to avoid any questions over the conclusions drawn in the original review or to look at modifying, adjusting or correcting the original proposals, re-considering the capacity of sites or adjusting those plans to take into account the supposed additional requirements for Oxford's housing needs.

The original plans are treated as a *'sacred cow'* that should not be altered in any way. This is repeatedly referred to in the document as a positive asset. In that sense it self-evidently does not represent a review at all. The proposals contained within are simply being *'bolted on'* the original plans in order to prevent any need to actually look at them again. This is disingenuous, not only with respect to the Council's responsibility and agreement with the planning inspectorate to review their original proposals after 2 years, but also to the people that Cherwell District Council (CDC) represents.

The second thread is one of *'greenwashing'* whereby spurious claims are made for the environmental benefits of destroying large areas of greenbelt. These include nebulous paragraphs suggesting *'green infrastructure'* gains as well as ludicrous claims for increases in biodiversity, wildlife habitat, access to recreation, reductions in pollution and improvements in air quality. All of these aspirations are of course laudable, but few, if any, of them have any basis in fact. Neither is any direct evidence given of the realistic achievability of these aims. They simply pepper the proposals in an obvious attempt to obfuscate the significant environmental damage that they represent.

It's also apparent from specific errors in geography displayed in these proposals that the planners involved have little local knowledge of the boundaries and local landscape involved. Considering the amount of upheaval and damage to the environs that is proposed within, one might assume that those drafting such plans would have an intimate knowledge of the area. The obvious lack of such information does not lend weight to the conclusions drawn or particular legitimacy to the proposals, neither does it demonstrate an understanding of the implications of the strategies under discussion.

However the penultimate paragraph in the executive summary seems to suggest that the architects of these proposals aren't even confident themselves that they can be achieved, allowing for the option of reversing the proposals if this proves to be the case.

"The policy makes it clear that if monitoring indicates that the vision and objectives cannot be met, the Council will consider whether it wishes to ask the Secretary of State for Communities and Local Government to revoke the Partial Review under Section 25 of the Planning and Compulsory Purchase Act 2004 in the interest of releasing alternative sites that will achieve delivery by 2031"

Hardly a vote of confidence in proposals that are referred to in wholly positive terms throughout most of the rest of the document.

For these reasons and the specific references given below I believe these plans are not positively prepared, not justified, not effective and are fundamentally unsound.

(Policy PR3) - exceptionally allow for development in the Green Belt having considered all other reasonable options and the vision and objectives we need to achieve

Yarnton is a village with a population of approximately 2,550 and Begbroke is a village with a population of approximately 780 based on the 2011 Census. There are approximately 1,350 houses in Yarnton and 390 houses in Begbroke. The proposals from CDC will be to build 2,480 new houses on the Green Belt land that currently separates our two villages.

This new development crosses the parish boundaries leaving a physical gap between Begbroke and Yarnton of approximately 50 metres. This has rather prosaically been referred to as a 'green corridor'.

There is also only a small gap between this enlarged development and Kidlington, meaning in effect that the three villages are merged into one large conurbation with an estimated population upwards of 30,000.

These proposals represent a significant incursion into green belt land.

The government attaches great importance to Green Belts. Land designated as green belt under the National Planning Policy Framework (NPPF) is protected for a number of important reasons.

The policy states :

"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"

Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

According to the NPPF : "Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"



Development is generally not permitted on green belt land. The designation of green belt can only be removed in exceptional circumstances.

These include limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan

Also limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which

would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development

The CDC Partial review highlights the importance of Green Belt in its own local plan and this is referred to in the partial review (section 5.32) referring to policy ESD14 of the existing Local Plan (2015) which seeks to maintain the boundaries of the Oxford Green Belt in order to:

1. Preserve the special character and landscape setting of Oxford
2. Check the growth of Oxford and prevent ribbon development and urban sprawl
3. Prevent the coalescence of settlements
4. Assist in safeguarding the countryside from encroachment
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It goes on to say :

"Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG. Development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities. Proposals for residential development will also be assessed against Policies Villages 1 and Villages 3.

Other statements on the green belt included in the Cherwell Local Plan Pt 1 included:

A11: "Development in the open countryside will be strictly controlled. In the south of the District, the Green Belt will be maintained, though a small scale local review of the Green Belt will be conducted to accommodate identified employment needs at Kidlington."

B.260: "It is essential that the impact on the Green Belt is minimised, therefore priority will be given to locations that lie adjacent to existing development, avoid the coalescence of settlements, protect the vulnerable Kidlington Gap and otherwise have the least impact possible on the Green Belt."

Yarnton and Begbroke are covered by "Policy Villages 1" that is reference above. This means only certain types of development can happen in such villages and is limited to the following:

- Minor development
- Infilling
- Conversions

Policy PR3 in the review document seeks to overturn these restrictions that only recently were regarded as vital and sacrosanct. This is to facilitate the removal of significant portions of green belt land without demonstrating any exceptional need to do so.

To this end it contains clauses such as 5.37.2 which includes the baffling requirement to :

"ensure that the Green Belt does not include land which it is unnecessary to keep permanently open"

Suggesting that Cherwell regards some areas of green belt as being potentially liable to closure.

Quite what clause 5.37.5 means by : *"safeguard land that may be required in the future at a non-strategic level"* is not fully explained.

Policy PR3(e) appears designed to pre-empt any future consultation or discussion on the expansion of the Begbroke Science Park, although the exact nature of this expansion will not be known until the local plan Part 2 is announced. It would seem however that the expansion of the Science Park is a foregone conclusion in the eyes of CDC, regardless of it meaning further encroachment into surrounding green belt as it stands now.

Policies PR8 and PR 9 propose the siting of 4400 new dwellings on green belt land around and between the ancient villages of Begbroke and Yarnton which would represent a more than doubling of the existing number of houses. In terms of local population it would mean more than tripling the existing levels

None of these plans could be described as 'limited' in the context of areas defined in policies PR8 and PR9 where entire discrete settlements would be left without adequate separation between them. These policies would in effect merge three separate communities – Begbroke, Yarnton and Kidlington into one large conurbation, taking 3 small and ancient settlements established over 5000 years ago and amalgamating them into a single conurbation or town. This would represent urban sprawl on a grand scale and would be completely in opposition to the purpose of designated green belt land.

Policy ESD14 is further contravened as the separation between land defined in policies PR8 and PR9 will effectively be only the width of the A44.

Policy ESD13 also sought to enhance the character and appearance of the landscape in urban fringe locations.

The area that CDC are contemplating removing from Green Belt was as recently as April 2017 described in their own green belt report as being

"critical to the maintenance of high separation between the villages of Yarnton and Begbroke"

They went on to say that it

"constitutes open farmland with a strong countryside character, development of which would represent significant encroachment on the countryside and would potentially detract from the generally rural character of the high ground surrounding Oxford"

In the original Cherwell Local Plan 2011-2031 (Part 1) adopted in 2015, both Yarnton and Begbroke were classified as Category A villages. CDC policy allows only minor development, infilling or conversion in, or alongside these villages.

It's clear then that CDC's own assessment that the maintenance of the character of both villages and the surrounding countryside is of vital importance and they should not be buried under a swathe of new development as a planning expedience, especially where no exceptional need has been demonstrated.

Policies PE8 and PR9 are therefore not consistent with CDC's own policies and assessments, neither are they in accord with national planning guidelines on green belt land and are therefore both unsound.

Section 5 - A Spatial Strategy for North Oxford, Kidlington and the A44

Corridor - Exceptional circumstances for removal of land from the green belt

Paragraph 5.17 of the review document refers to "The exceptional circumstances for the removal of land from the Oxford Green Belt"

The reasons given are largely speculative, spurious and specious and in no way offer sufficient justification for the incursion into green belt land that is being proposed.

They are each challenged as follows :

1. the urgent and pressing need to provide homes for Oxford including the exceptionally high need for affordable homes

This need has by no means been proven and relies on speculative and notional figures initially taken from the Strategic Housing Marketing Assessment (SHMA), itself a hugely speculative document the validity of which has been challenged on numerous occasions by leading experts.

Research from the Campaign to Protect Rural England (CPRE) and others has shown the figures in the SHMA to be wildly over-estimated and based on assumptions of population and economic growth of anything up to twice the national average. The data used is now even more outdated since the Brexit vote which is likely to have impacts on both housing need, population and economic growth.

These figures were then further extrapolated by the Oxfordshire Growth Board and a figure for 'unmet need' in the city of Oxford was essentially plucked out of the air.

As described in the review document :

"authorities agreed a working assumption of 15,000 homes for Oxford City's unmet need"

Finally this assumption, based itself on another estimate was divided up amongst the surrounding districts.

An 'assumption' does not demonstrate a 'pressing and urgent need'.

The figures have no sound basis in evidence or empirical data and have recently been found to be unsound after a new Government method for calculating housing need revealed that the county, which had been planning for 100,000 homes over the next 20 years using figures generated from the SMHA, actually only needs to build around 68,000.

The government is currently consulting about a new approach to calculating the key 'Overall Assessment of Need' (OAN) figures which it is believed are likely to render the speculations contained within the SHMA as unreliable. In Oxford city this has revealed that the numbers being used to define their 'unmet need' were nearly 50% overstated casting serious doubt on their claims of an 'unmet housing need'.

Therefore this argument cannot stand as an exceptional circumstance for removal of land from the green belt. At the very least any plans to do so should be halted until Oxford City have verified their numbers under the new government guidelines that are currently being consulted on and have published their own local plan demonstrating their own inability to meet these needs.

www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

2. the clear inability for Oxford City Council to fully meet its own needs

At this point there is no 'clear inability' as data on this is still emerging. Oxford is yet to publish its local plan and the issues highlighted in item 1 above make such assumptions potentially unsound. What is clear is wider political agenda in Oxfordshire to prioritise economic expansion over housing provision which not only uses up available land that could provide additional dwelling space, it also increases the need for workers to commute into city centres like Oxford. The paucity of housing provision on sites such as the Northern Gateway highlight this skewed vision which is largely driven by outside pressures from quangos such as the Oxfordshire Local Enterprise Partnership, the Oxfordshire Growth Board (neither of which are directly elected or accountable), along with Oxford University who own the majority of the land involved. Rather than helping to exacerbate these problems by expanding the commuter belt in all directions, local district councils and the city council should be looking to push back on these external forces to prioritise areas where truly affordable social housing could be provided. High land value areas such as those as in policies PR8 and PR9 would be very unlikely to provide this as they would be subject to the same pressures from developers in terms of viability and market forces. For all these reasons the overall position is far from 'clear' and this statement does not represent exceptional circumstances for removing this land from the green belt as per NPPF guidelines.

3. that the consideration of all other reasonable options did not suggest that a sustainable, deliverable alternative could be provided without unacceptable harm to the existing Cherwell development strategy.

The term 'reasonable' is of course subjective, but it's clear from statements like this that no other options were genuinely considered. As stated above, there appears to be an agenda throughout this planning process to ensure that previous plans laid out under the local plan 2015 are not seriously challenged or re-considered. They have been treated as a 'sacred cow' and the lack of challenge to them regarded as a positive.

This suggests that this review has not been carried out in a robust and transparent way and the overall aim has been not to actually review the 2015 plan at all. The preference is apparently to add land into the planning process that was previously not considered and which only a few months ago CDC regarded as vitally important green belt land.

From this statement and many other similar comments throughout the review document it seems clear that the new plans were 'cobbled together' and bolted on to the existing plan for reasons of timely expediency as the deadline for the agreed review period approached.

In any event this is merely highlighting what CDC see as an additional advantage to their plans, it is not a prima facie exceptional circumstance as defined by the NPPF.

4. *the immediate relationship of the north Oxford and south-east Kidlington area to the existing built-up area of Oxford, the allocated strategic development area of Northern Gateway and the new Oxford Parkway railway station / park and ride interchange.*

There are already fears that the Northern Gateway development will put serious strain on already overburdened infrastructure. There is no case for claiming that additional pressure provided by further over-development will help matters. Again this is an aspiration and a matter of opinion. It is not a compelling reason or justification for removal of land from green belt protection.

5. *the clear economic and social relationships that exist between Oxford and Cherwell's local communities at Begbroke, Yarnton, Kidlington and at Gosford and Water Eaton, and the clear potential to develop these relationships*

These relationships already exist to a large extent, Jamming all these communities together in one bloated conurbation will not create new relationships and could arguably be detrimental to those that are already there. In any event 'relationship building' is not an exceptional circumstance required by NPPF rules for removing green belt protection.

6. *the significance of the north Oxford - A44 Oxford to Woodstock corridor to the economic forecasting work which informed the countywide assessment of housing need including the Oxford's Northern Gateway site, the University of Oxford's Begbroke Science Park, London-Oxford Airport and the Langford Lane area of Kidlington*

It's already been established that these assessments were over-stated and unsound. This, as with most of these statements, does not represent an exceptional justification for green belt destruction, it is merely speculation about a situation that may or may not exist and may always have existed. There is nothing within this review that suggests these circumstances would change or need to change.

7. *the unique place shaping potential for the area of land next to the University of Oxford's Begbroke Science Park; land situated next to Yarnton and Begbroke village and close to Kidlington. The Begbroke Science Park is a facility of international significance and is of great importance to the local and Oxfordshire economy. Its location close to Oxford and Kidlington and next to the Oxford Canal and railway provide for an exceptional opportunity to meet Oxford's needs in parallel with the expansion of the Science Park.*

The Science Park development itself was insinuated on the area with no proper consultation on either a strategic or local level. Its continued expansion in or adjacent to green belt land should by no means be a given, as is suggested here, and should be subject to proper and rigorous consultation with the local community.

Its international standing is questionable, certainly in a post Brexit world, and its benefit to the surrounding area is limited. Many of the existing buildings are speculative developments intended to attract private enterprise rather than academic study and employment opportunities, whilst welcome, are limited, certainly for the existing local community.

It's true that much of the surrounding land in the area, and nearly all of that currently under consideration in this review is owned by the university, and that they stand to make a considerable financial gain should it become available for development, but enrichment of the university is by no means an exceptional circumstance as required by national guidelines on green belt protection.

Enabling private industry is also not an exceptional circumstance to justify destruction of green belt land.

8. *the need to ensure a cautious approach at Woodstock (in terms of the number of new homes) due to the presence of international and national heritage assets while responding to the proximity and connectivity of a growing town to both Oxford and the growth areas on the A44 corridor*

The two statements in this paragraph would seem to be mutually contradictory. Either Woodstock is growing or it isn't. It also seems contradictory to be concerned about over-development due to historic buildings whilst apparently unconcerned about villages such as Yarnton which is mentioned in the Domesday Book.

9. *the improvement of transport infrastructure in the north Oxford /A44 corridor area*

This is a fantasy that will be further discussed below.

10. *the strengthening of Kidlington village centre related to sustainable transport improvements including access to employment areas and the appearance of the built environment/public realm*

This would appear to be nonsense. Kidlington already has good access to public transport (sustainable or otherwise). How this relates to the appearance of the built environment is completely unexplained. This does not demonstrate exceptional circumstances as defined by the NPPF.

11. *the opportunity to provide improvements to the quantity and quality of new public open space and green infrastructure, access to the countryside; and, the provision of additional facilities that will benefit Kidlington, Gosford, Begbroke and Yarnton*

These facilities already exist in abundance as part of the open spaces afforded by the green belt land that this review currently threatens. This statement is the epitome of the contradictions evident throughout this document. It certainly does not offer any evidence of the exceptional circumstances that would be required to remove green belt protection. Arguably it provides evidence for the need to maintain it.

12. *the ability to create a sustainable, holistic, joined-up vision for the whole of the north Oxford /Kidlington/A44 corridor area*

Coalescing 3 separate and discrete local settlements into one large urban conurbation could I suppose be described as 'joined up' but not really in a good way. As to the 'ability' to do this, there is no doubt that it could be done. The question is : should it be done? Considering the principles which support the green belt suggest it should not, this statement shows exceptional need for coalescence of these individual settlements. Indeed it suggests the opposite is desirable.

Words such as 'holistic' 'sustainable' and 'vision' are simply double-speak thrown in for effect. They are essentially meaningless jargon within the context of these proposals. These values are certainly not demonstrated or 'fleshed out' in any meaningful sense beyond a few frequently repeated buzzwords. They do not represent exceptional circumstances.

These 12 statements are posited as the central arguments for removing land from the green belt. Few of them stand up to anything above a perfunctory examination and virtually all of them are rooted in extreme speculation, notionalism and doubletalk. They do not meet anything like the level of proof required to claim exceptional circumstances required by the NPPF and consequently are not positively prepared, not justified and are unsound.

Transport infrastructure

Paragraph 2.18 gives 3 reasons for selecting areas such as PR8 and PR9 in terms of transport :

"1. the proximity to Oxford, the existing availability of public transport and the opportunity to maximise the use of sustainable and affordable transport in accessing Oxford's key employment areas and services and facilities

2. the opportunity to achieve an overall, proportionate reduction in reliance on the private motor vehicle in accessing Oxford's key employment areas and services and facilities and to achieve further investment in sustainable transport infrastructure

3. the deliverability of sustainable transport improvements in comparison to other Areas of Search"

These claims give a veneer of viability to the whole scheme, yet on closer inspection they are nothing more than wishful thinking.

The plans are being sold on the premise that they provide easy access into the city by simple virtue of their straight line proximity to the city centre. This is highly simplistic and initially ignores all the limiting factors imposed by the existing road network, peak traffic flows and local network geography. When these salient facts become evident the review seeks to divert attention away from them by broad references to aspirational projects such as a 'Rapid Transport Scheme' or 'Green Infrastructure'.

None of these concepts are defined in the review beyond these loose buzzwords. When questioned at one of the local presentations, planning officers obviously had no clue how many of these projects would work in practice. It's not enough to simply aspire to improved transport systems, there is a need for specifics about how they could be achieved, especially if additional burdens are going to be placed on already overstretched existing infrastructure by massive increases in population.

Without a clear and workable plan, and most importantly, the funding to make it reality BEFORE additional houses are built, further development will simply serve to make an already intolerable set of circumstances much worse leading to a reduction in the quality of life for both existing and new residents alike.

In the review document executive summary the transport plans are described as *"aspirational but realistic"*. They are certainly the former but in no way could they be described as the latter.

Section xi, Paragraph 4 of the executive summary refers to :

"providing development so that it complements the County Council's Local Transport Plan (including the Oxford Transport Strategy) and facilitates demonstrable and deliverable improvements to the availability of sustainable transport for access to Oxford (objective SO19)"

This is quite simply not true. There are no details within these plans of how such improvements can be delivered, so claiming they are 'demonstrable' is pure hyperbole.

Proposals within the review surrounding transport infrastructure are some of the most audacious, fantastical and speculative within a document that is an exemplar of those qualities.

There are several wild assumptions made about existing and additional traffic flow, private car use and availability of public transport. The terms 'sustainable' and 'green' feature heavily throughout these proposals, but as with so much else within this review, there is very little substance to the aspirations and no realistic assessments or explanations of how they could be delivered.

Paragraph 5.45 states :

"The road network around north Oxford suffers from high levels of traffic congestion and delay exacerbated by major road and rail intersections. Oxford is covered by a city-wide Air Quality Management Area (AQMA) supported by a Management Plan intending to improve city-wide low air quality and congestion by

prioritising sustainable transport measures. Within south Cherwell, a small section of the Bicester Road at the edge of Kidlington is also designated as an AQMA"

None of this is disputed. Indeed in terms of air quality, it's arguable that the current AQMA understates the paucity of air quality in the area, especially during the morning and evening rush hours when the A44 through Yarnton, Begbroke and through to Woodstock is gridlocked.

However this reality seems then to be glossed over by the review in an attempt to minimise the impact of introducing a further 4400 dwellings into the area, which inevitably means more strain on overloaded roads.

Paragraph 3.55 states :

"One of the main aims of the Local Transport Plan remains to reduce pressure on the road network by encouraging the location of housing close to jobs where people can more easily walk or cycle to work and in places where people will be able to use high-quality public transport to get to work"

Much of the review works on the assumption that workers will travel into Oxford city to work whereas the city's own research suggests that of two thirds of workers in and around the city more of them work on the east of Oxford. 31,400 are said to work in the city centre whilst 35,300 work in Headington and Cowley.

This casts some doubt on the likelihood that new houses to the north of the city will be best suited for these workers.

Even if public transport were to be made more available (currently buses are few and far between and being reduced along with county council subsidies) most workers would need to change buses or trains in Oxford before completing their journey to the east. This is likely to mean a significant increase in car usage on roads already under serious strain.

Assumptions about traffic volume in the partial review are plainly misleading. With CDC's own transport assessment report (TA) - Transport Assessment Evidence for Cherwell Local Plan (Part 1) Partial Review Oxford's Unmet Housing Need July 2017 – state s:

"Car ownership and car usage is high outside Oxford, with 87% of households owning a car" (paragraph 2.23)

This suggests an overall increase of over 3800 additional private vehicles in the area with over 2000 of these being concentrated in the areas covered by policies PR8 and PR9.

Currently 69% commute by car per (TA 2.32) which means a potential 1380 additional traffic movements on the A44 at peak times. The cycle 'super highway' only frees up to 60 cars at peak (TA 7.55).

Yet the traffic modelling figures referred to in the partial review only state an increase of 1.3%-1.4% at peak times (para 5.47 partial review document). This figure can only be achieved using some creative manipulation of statistics and samples. Notably these figures also assume that Sandy Lane will still be open to traffic whereas elsewhere in the partial review document there is a proposal for this "minor but well-used road" (para 5.108) to be closed to vehicular traffic in policy PR8 paragraph 18f.

This demonstrates not only a lack of understanding of the local traffic flows but also a marked disconnect not only between the assumptions underlying these proposals but between specific elements of policies themselves!

There are some feeble attempts within the Traffic Assessment report to reconcile these jarring inconsistencies, but as with much of the evidence underpinning these proposals, these are based on pure conjecture and optimistically convenient guesswork which anyone with experience of the area and half an ounce of common sense can easily see.



A44 DURING RUSH HOUR

The other solution to the potential mayhem that will ensue on the local roads is County Council's Rapid Transit proposals for enhanced bus infrastructure and services to the city first referenced in the review document in paragraph 3.58 and then throughout the document :

"The County Council wishes to develop a new Rapid Transit network providing '...fast, high-capacity, zero emission transport on the city's busiest transport corridors, offering a tram-equivalent (or in future potentially tram) level of service and passenger experience...'"

While this sounds like a very forward thinking, green and sustainable plan, at present it is little more than a pipe dream which once again bears little close scrutiny when seen in actual context. The only hint of detail contained in these proposals is the phrase *"designated, high-quality bus routes"* which in plain English means a bus lane.

So the grand sounding Rapid Transit Scheme is essentially a bus service (presumably an electric bus) which would run in a dedicated lane on the A44. A great idea if it were not for the fact that the A44 consists of only 2 lanes – one in each direction. Both lanes are currently well over capacity at peak times and so the removal of

either would require this road to become part of some massive one way system. Given the key nature of the A44 as the main arterial road in and out of Oxford this is impossible.

That leaves the option of adding an additional lane, which from discussions with planning officers, seems to be the preferred solution. Again this would be fine, if it were not for that bothersome reality thing again.

Widening the A44 to accommodate an additional lane (or presumably 2 lanes if the Rapid Transit System were to work in both directions) be extremely difficult due to bordering properties along its length.

Even if this could be overcome by the comprehensive use of Compulsory Purchase Orders there would remain a number of 'pinch points' between Yarnton/Begbroke and the city. These consist of a railway bridge, a canal bridge and the support structures for the Pear Tree interchange flyover. There would also need to be significant remodelling of at least 3 other roundabouts and several junctions along even the short length of road services policy areas PR8 and PR9 and the city.

Of course it's not beyond the bounds of possibility that even these obstacles could be overcome, but the financial cost of building 2 new bridges and remodelling a flyover would be immense. Certainly well beyond the £152m currently being bid for from government by CDC. There would also be incalculable costs in terms of local traffic chaos with resultant losses to businesses while these works were undertaken, each of which would unavoidably require the complete closure of the A44 in both directions.

Given that works to Cutteslowe and Wolvercote roundabouts took over 15 months to complete and cost £10m to essentially an extra lane to each, it's obvious that the enabling works required for a dedicated bus route to and from Yarnton/Begbroke/Woodstock into and out of the city would be massively expensive both in terms of money, time and the resultant impacts on local residents and businesses.

Other proposals for walking and cycle routes, are again out of synch with reality.

Paragraph 5.50 in the review document states : "

"Locating new development elsewhere in Cherwell (further away from Oxford) would not help minimise the significant number of vehicular trips generated by jobs in Oxford nor provide the same opportunity to assist with the delivery of the Oxford Transport Strategy. Increased congestion would be likely as there would be fewer opportunities for higher levels of walking, cycling and public transport use from new residential developments"

This would of course depend on where these developments were. If they were still within the A44 corridor it wouldn't make much difference to the overall congestion generated as they would still be subject to the same peak flows and pinch points. This also assumes that there is any advantage in siting additional housing in the areas being proposed, when it's clear from the demographic studies of local employment profiles and the majority of employment is located to the east of the city.

Cycling and walking from the Yarnton/Kidlington/Begbroke areas are outside the radius commonly accepted as commutable by these methods.

The walk into Oxford using even the most direct routes is between 4.5 and 5 miles in length and the proposed cycle routes would actually ADD at over a mile to the current route. It's generally accepted that the maximum distance commutable for average walkers and cyclists is 3 miles. It would also be difficult to achieve any cycle route that would avoid crossing major trunk roads (as the existing cycle paths into Oxford do) unless there were significant investment in bridges or underpasses, neither of which are mentioned in the proposals.

Whilst I would support any moves towards sustainable transport initiatives, it's clear that these areas of north Oxfordshire are singularly unsuited to such projects in the short term and it would be very unlikely to seem such additional transport infrastructure implemented within the timeframe encompassed by this partial review.

It is arguable that many of these transport improvements are already desperately needed for the people already living in these areas, so perhaps if such projects come to fruition over the coming years there may be more scope to consider additional development. But it would seem unlikely that anything on the scale being proposed now would be viable without significant and major improvements over the next 10-20 years.

(policy PR5) - Seek to provide a consolidated and integrated approach to the provision of green infrastructure alongside new development, particularly within the Green Belt

In his foreward to the review document leader CDC Councillor Barry Wood explains that the new developments being proposed will *require "necessary infrastructure to be provided including new schools and facilities and identified improvements to the A44 transport corridor with new rapid bus routes, rail facilities and cycle connections into Oxford"*

This 'requirement' is as much of a commitment as we get from Councillor Wood. There are no details about who would pay for these additional facilities, who would build them, staff them or maintain them. As with the rest of these proposals, the idea seems to rely on the old Hollywood line "if you build it they will come". Whereas that might work in 'La La Land' back in the real world we should expect rather more of a guarantee from the man who's proposing to tear up so much green belt land apparently on a wing and a prayer.

Currently Oxfordshire's infrastructure is degrading, even before growth. The Oxfordshire Strategic Economic Plan (SEP) identifies that *"at present Oxfordshire is facing significant constraints on water, power supply and grid capacity which will need to be addressed in order to meet sustainable growth objectives"*

Money from central and local government is not available to reach these objectives and, as has already been discussed above, the amount of funding being bid for my CDC is very unlikely to cover even modest road upgrades, let alone the costs of providing additional services capacity.

The Oxfordshire Infrastructure Strategy Stage One Report (OxIS) states that :

“There is an increasing gap between the expected rate of growth up to 2031 and the ability to deliver key infrastructure”.

Successful, grand development plans are usually centrally conceived with clear funding routes available at the outset. This is not the case with these proposals. Over-reliance on developer contributions means that infrastructure will not be there, ready and waiting, to provide for homes when they come. Developer contributions are not equal to the task of big infrastructure projects, and the money is released retrospectively leaving local people devoid of infrastructure for many years.

For example :

- The bridge to be built over the Thames at Culham. Significant numbers of homes to be built before the developer contributions amass to enough to start the bridge. On the other hand, the homes cannot be built and sold without the bridge existing. Worryingly, a representative of the developer (building 2000-3000 homes at Culham) says their contribution could not cover the cost of the new road and bridge, and that that would not happen before the housing.
- 950 homes are to be built at North Abingdon before the area receives slip roads onto the A34.
- Already, some new Oxfordshire Housing Estates have not been connected to the sewage system and are reliant on sewage lorries. This is a worrying state of affairs and a health hazard. Sewage removal is the first and foremost requirement of a civilised society, guarding from degrading conditions and disease.

Developer contributions are not always what we expected them to be. Perhaps the original planning permissions are gained without realistic assessment of the costs. Whatever the reason, it is entirely normal for developers to reduce their infrastructure contributions because their projects would otherwise not be feasible.

Water supply

Water has several dimensions, few of which are even mentioned in the review document.

Firstly there's the issue of water supply, which is by no means guaranteed. The previous few years have been good in terms of rainfall, although the preceding years saw fairly frequent water shortages. There are plans to build a reservoir almost as big as Heathrow Airport in Abingdon in South Oxfordshire but this is intended to tackle water shortages in London, not more local supplies. The proposed reservoir is also the subject of fierce local opposition and has been for over 10 years. There is no mention in the review document as to how the additional water supply infrastructure will be incorporated into such large developments and what impact the additional demand may have on other existing settlements and dwelling.

Foul drainage

The review document refers several times to the principle that :

"The application should demonstrate that Thames Water has agreed in principle that foul drainage from the site will be accepted into its network"

As with many other assumptions throughout these highly speculative proposals this is very easy to say, but far less likely in practice.

The Oxfordshire Infrastructure Strategy Stage One Report (a report referred to in the partial review document) in turn refers to the Thames Water report 'Taking Care of Water: The Next 25 Years' where they raise the concern that :

"the majority of infrastructure reaching or past the end of its design life, which increases the risk of the system becoming overwhelmed as a result of severe rainfall. This increases the risk of the system becoming overwhelmed as a result of rainfall [sic]. Even though the majority of WWTPs (Waste Water Treatment Plants) in Oxfordshire currently have no capacity issue, upgrades and reinforcement works are expected to be required. Cassington WTP, identified previously as having insufficient capacity to support growth, requires upgrades and/or improvements to ensure continuity of service. Additionally, many of the WWTPs in Thames Water's whole region require major refurbishment in order to maintain service in the future and to ensure processes are up to industry standards"

Elsewhere in this report it is stated that :

"The majority of Wastewater Treatment Plants within Oxfordshire are close to capacity"

In the light of this report it would seem that any additional significant demand placed on these facilities is likely to tip the balance unless additional investment is made in advance.

Flooding

The OxIS report notes that :

"Surface water and sewer flooding is becoming more prevalent with additional demands from new development" "flood risk is set to worsen due to the combination of climate change and urban development".

However the OxIs report notably under-represents the importance of pluvial flooding: i.e. flash floods from rain. Recent events have shown many regions are now susceptible to flooding following heavy rain. It is very likely this has been exacerbated by increasing urbanisation. The OxIS report and the partial review document ignores the vital importance of flood plain areas and the use of 'natural' flood prevention.

New infrastructure including roads, add to flood risk as part of urban development and there has been an increase of incidences of flooding in the Yarnton over the past several years. Yarnton is cited in the Cherwell Level 1 Strategic Flood Risk Assessment Update as having had significant flooding events in 2007, 2008, 2012, 2013 and 2014.

The building of nearly 2000 new dwellings on what is now open farmland can only serve to increase the likelihood of flooding in an area already becoming more prone to these events.

Other Infrastructure

It's a given that the increase in local population will require additional services such as schools, doctors and other health facilities.

In terms of the latter the Oxford University Health Trust and Care Commissioning Groups are currently in the process of reducing the number of beds available in Cherwell and Oxfordshire in general.

There is currently doubt over the long term viability of the Horton General Hospital on Banbury which has already had its consultant led maternity unit downgraded to midwife led. Hospital capacity in Witney has also recently been reduced.

The government's latest round of NHS reorganisation – The Sustainability and Transformations Plans – are set to reduce these capacities even further.

Already this has resulted in far greater strain on maternity and other services at the John Radcliffe hospital which is the closest major hospital, with long queues to get into associated car parks. Indeed the hospital itself advises patients to arrive at least 90 minutes before an appointment to ensure they can find a parking space in time.

An additional population in the area of anything up to 10,000 is likely to push these already stretched services over the edge.

There is no mention within the review document about additional health service provision. This would seem to be another glaring omission in a plan that has clearly not taken such vital issues into consideration.

Begbroke Science Park

There appears to be an unquestioning assumption on the part of the planners that the Begbroke Science Park will be expanded.

For example Paragraph 5.105 claims :

"This means that the land to east of the A44 in the vicinity of Begbroke Science Park offers a unique opportunity for place shaping, to help meet Oxford's unmet housing needs and to do this in close association with the expansion of one of the University of Oxford's key economic assets"

This in itself would seem to suggest an entirely blasé and cavalier approach to proper planning consultation from CDC. Something that is not surprising given that there was scant opportunity for locals to respond, object or otherwise comment in it's arrival in the area in the first place. I live directly opposite it and the first I knew of the plans was when the builders started putting up the steel superstructure. Apparently being in full view of a development is not considered sufficient justification to seek an opinion on it.

Whilst having such a development in our midst is now something of a fait accompli it should still be required to follow usual planning application rules which should not be regarded as a forgone conclusion. I also seem to remember being assured when the first building was erected, that its lifespan was in the region of 20-25 years. As we're more than half way through that now, one might expect the university to be making plans to move to a more suitable site in the near future rather than expanding into the less appropriate environment it is currently squatting on.

Given its narrow requirements both in terms of employees and local resources, the contribution to the local economy afforded by the Science Park is not something I would regard as particularly significant. So I'm at a loss to understand why the partial review document is peppered throughout with claims that it is such a vital local asset and one that should be allowed free rein to balloon in every conceivable direction. Perhaps this is a discussion that should be had more widely in the public arena after these broader proposals have been dealt with.

Ecological Impacts

As discussed in the transport infrastructure section above, there is likely to be a significant increase in private car use as a result of the increased population density. This will in turn impact on air quality, which is already an issue within Oxford city itself and some areas in north Oxfordshire.

This will also potentially affect wildlife and insect life as well as the local flora.

The loss of good quality farmland is also something that should not be forgotten, especially in a post Brexit world where the UK likely need to rely more heavily on homegrown foodstuffs.

Wildlife and nature conservation

The executive summary in the review document states :

"We are grasping the opportunities for distinctive place-shaping, for a consolidated approach to green infrastructure and for the achievement of net gains in biodiversity"

This is greenwashing at it's worst. Houses do not provide biodiversity, they provide housing. Biodiversity requires large areas of untouched green space. Replacing that with a few bat boxes and some birdhouses is simply not a fair exchange.

The areas around the locales encompassed in PR8 and PR9 are rich in wildlife and provide vital habitat to a number of species.

Notable amongst these are several amphibious species such as frogs, toads and the protected great crested newt. We also have an abundance of bats, dormice, hedgehogs, roe and muntjac deer, foxes and badgers as well as many once species of bird some of which are already in decline. Song thrushes, skylarks and yellowhammers are frequently heard throughout the year along with the more usual blackbirds. We also have woodpeckers, kestrels, sparrow hawks, buzzards and red kites which have migrated from further south where they were re-introduced a few years ago.



These creatures cannot exist in small island communities added as an afterthought to wide sweeping developments. We will simply lose them forever and with them part of what makes this part of the country such a delight to live in, work in and visit.

There's a great deal of references throughout the review document to 'green infrastructure' although what exactly is meant by this in the context of the proposed developments is not clearly defined. In that sense the term is essentially meaningless.

Green infrastructure already exists in the green spaces encompassed by the green belt that these proposals place under threat. Large areas of animal habitat will be concreted over should these plans go ahead and that does not represent a net gain in green infrastructure.

What is being proposed are small areas of green space that are intended to compensate for a contiguous landscape that is both essential to wildlife and of great value in terms of the health and well-being of Oxfordshire residents, as well as the many visitors it attracts. Once this resource is lost, we will never get it back.

The OxIS report recognises this with the following paragraphs :

"Natural England's Green Infrastructure Guidance advises that green infrastructure is a "strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features". Oxfordshire's green infrastructure is highly valued, forming a versatile network of natural and semi-natural spaces that provide the basis for agriculture, supports the area's ecology and

contributes to an attractive character that draws residents, employers and visitors into the county. The environment also performs a broader range of functions, known as ecosystem services, such as air quality and climate regulation, flood mitigation and space for recreation which all have tangible benefits to Oxfordshire's society and economy. Green infrastructure can also promote physical activity and encourage more people to get out into nature, with improved health and wellbeing"

Discussion of landscape-scale assets however, does not take into account the crucial importance for nature, of uninterrupted contiguous habitats. Ecologically speaking, it is not possible to preserve green-infrastructure 'assets' without them having a coherent hinterland.

Nature does not work in small islands; it requires swathes of clean, unpolluted land, air and water. These must be joined up and not interrupted by roads. One of the greatest concerns for the natural world in Oxfordshire is the cutting up of habitats of plants and animals. Where a barrier prevents normal movement patterns, including re-seeding and vegetative reproduction, islands are formed which are too small for species to survive in. Further damage is done to biodiversity.

It is hard to appreciate how fragile our Oxfordshire ecosystem is. In Britain, there has been an 80% decline in the abundance of animals since 1968. Worse still for hedgehogs! For every 40 hedgehogs in the 1950s, there is now only one: a 97% decline.

Paragraph 5.69 makes several mention of '*green assets*' as if these are numbers on a balance sheet. These 'assets' are habitat to a wide range of flora and fauna, they are living, breathing ecosystems and not something to be exploited in feeble mitigation of the wholesale destruction of large areas of ancient farmland, woodland and open space.

We need nature beyond its GDP potential. All aspects of infrastructure (transport, health and social care, education, water, communication, waste, fossil fuel utilities etc) are seen here as required to support growth; they are needed services for civilised life. They are not in and of themselves, expected to contribute to the economy.

In the cases of green infrastructure and of renewables, however, they are expected to justify themselves through their own growth potential; they are valued chiefly in so far as they bring in more money. This flies in the face of our understanding that, just as with other services, nature and clean energy are essential, in their own right, to underpin our society. A healthy ecosystem provides flood relief, clean water, clean air, pollinators, food, carbon absorption and storage; indeed the fundamentals for all life.

Green infrastructure furthermore provides "recreational value". Human health and wellbeing is measurably improved by a healthy natural environment.

To develop Oxfordshire in the way we wish, we should go beyond considering nature as having potential economic benefits, and appreciate that a functioning ecosystem must not be impaired by growth, because it is as essential to us as transport, health, social services and other infrastructure.

As it is fragile, we should allow 'nature to go first', overlaying our infrastructural requirements on the landscape in such a way as to protect and enhance our natural world.

Agriculture



The same may be said of the loss of land from farming. Whilst farming contributes little in terms of GDP it has the vital function of providing food. Food production, from growing to processing, is threatened by Brexit. Already, food production workers are eschewing working here. Aside from politics, and whether buying-in food from the EU becomes more difficult post-Brexit (we import half our food), climate change is having an effect on worldwide food production.

As an island, although we already cannot feed ourselves, we should protect the food sources we have. Additionally, the carbon cost in food miles is one that we would all seek to reduce. Local food is a desirable outcome and is a very popular concept in Oxfordshire. Agriculture is forecast to grow and good quality farmland like that surrounding Yarnton, Kidlington, Begbroke and Woodstock should be preserved as an important national asset.

Affordable housing

The Executive summary of the review document talks of providing for *"a range of household types and incomes reflecting Oxford's diverse needs"*

Discussions around the over-used term 'affordable housing' is something that should be considered as part of these proposals. Given that a great deal of justification and validity being claimed for these plans is based on the idea of providing housing for key workers it's worth noting that the current assessment of affordability, as defined by the NPPF, is a house price representing 80% of market value.

Also given that in Oxfordshire the average house costs 11 times the average salary, this equates to a definition of affordability set at roughly 9 times the salary of any new home buyer. It's extremely unlikely that key workers or those at the lower end of the salary scale will find a mortgage provider prepared to lend on that basis.

If the land in areas such as PR8 and PR9 are re-designated for development they will be worth in the region of £1-2m per acre, equating to anything between a 10- 20 fold yield for any current landowner. Regardless of this juicy windfall, it would seem very unlikely that any developer is going to build significant numbers of starter homes on land of that value.

There will of course be responsibilities imposed on developers to include properties that will be described as 'affordable' regardless of how meaningless that term is in Oxfordshire, but as it usually the case these ratios will slip amid claims from developers that projects will be less viable unless the numbers are re-worked.

This is already the case in Barton Park where houses built on land already owned by Oxford City Council are currently being marketed for prices in excess of £600,000. More than double the average price usually charged for houses in the area. There are some socially rented houses available on the same estate, but the ratio is far below the 50% originally agreed by the city council. Proof, if it were needed, that once land is released to private developers, there's very little that a local authority can do to ensure that grand promises of 'affordable' houses will ever fully materialise.

North Oxfordshire is already an area of high value housing. Is it really credible that developers are going to provide lower cost units without a fight? In the last major housing development in the area, building had to be forced kicking and screaming to provide any so-called affordable houses. Even then the provision was less than 10% of the total development and the 'affordable' houses were hived off into a fenced off section away from the other dwellings being sold even 15 years ago for close to half a million pounds.

We should not be conned into giving away our green heritage to these sorts of projects to enrich developers at the price of a rural landscape that we can all enjoy now for free.

Alternatives

There are other sites that could be considered such as north of the Peartree interchange, although these may still encroach on Green belt and wouldn't solve the transport problems with roads such as the A34.

Other suggested locations are nearer to Langford Lane.

Both sites are closer to existing infrastructure and public transport (with Peartree being adjacent to the Northern Gateway development. Neither of these locations would be within a strategic space, such as the 'Kidlington gap'.

Housing Density

Housing density is also something that could be manipulated although this has implications either way. Higher densities will produce a higher number of dwellings on a given space, whereas lower densities would be more in keeping with existing space in smaller villages.

It's clear from the very low housing density numbers being applied to areas such as PR8 and PR9 that these houses are being ear-marked as high value investments.

Whilst increasing housing density in these areas would be out of keeping with the existing built environment, it's not unusual for developers to increase density anyway once a project is underway. This maximises profit for them whilst increasing potential problems on local infrastructure.

Let's not forget that the housing numbers being discussed here are not set in stone. There's a very good chance that we will see many more dwellings eventually being built than are being claimed now.

Conclusions

There are so many facets of this partial review document that deserve comment that it was difficult to know where to start and indeed where to stop.

A few salient points that may not be evident from the above were the confusion evident between parish boundaries. Policy PR9 for example refers to land principally inside Yarnton parish, yet is entitled 'Begbroke'. An example of how much care has gone into compiling these proposals.

Another issue that needs to be examined is the true ability of Oxford City to meet its own housing requirements. Claims of being 'full up' seem to evaporate very easily when a new business or university development is proposed. Economic growth seems to trump the need for houses at every turn which brings into question exactly why Oxford's housing needs are not being met.

Perhaps if they prioritised housing projects over business and science parks, such as the much lauded Northern Gateway plans, they might have more scope to deal with their lack of affordable homes. All the time they use up brownfield sites for new economic developments, they are not only removing that land

from a pool that could be used for housing, they are further exacerbating the lack of living space for yet more workers that they are seeking to attract with further business opportunities.

No account is taken of the potential impact of Brexit, particularly on the university science park, which the review seems to assume will continue expanding with no deference to the fact that it is itself sitting in the middle of green belt. This expansion has even been cited as one of the reasons that further development should be allowed on the surrounding green belt land. A more spectacular example of the forgone conclusions that inhabit this so-called review is difficult to find.

But Brexit is also likely to impact on population growth in and around Oxford and have a further depressing effect on the already overstated housing need numbers that are ostensibly driving the proposals contained in this review.

Paragraph 3.18 in the review document says :

"This level of identified housing need is, for Oxfordshire, unprecedented in modern times. The Partial Review has been prepared with the understanding that a development strategy based mainly on the 'country towns' approach would not be sufficient to meet both Cherwell's and Oxford's needs"

It would appear then that the review is based on a false understanding, or at least false assumptions and lack of real data.

Paragraph 1.29 of the review document would appear to confirm this and contradict paragraph 3.18 when it says :

"The precise urban housing capacity or potential of Oxford will change as the City Council prepares and completes its next Local Plan, as new land supply studies are produced and as applications for planning permission are considered. Should a significant change in circumstances occur in the future, this would need to be considered by the Growth Board"

This is something I would wholeheartedly agree with. The figures being used now to justify an unmet need in Oxford are very liable to change, and considering new evidence that has recently come to light, it's highly likely that these figures will be revised downwards, perhaps making this review redundant.

There have already been calls from the local MP Layla Moran to halt this consultation pending further research and analysis on the exact position regarding Oxford's unmet housing need in the light of both new government statistics and the impact of Brexit.

This would seem like a very sensible move which I would wholeheartedly endorse but something that has so far been resisted by the executive members of Cherwell District Council who seem more keen to demonstrate co-operation with dubious claims from Oxford city, the Local Enterprise Partnership, Oxford University and the Oxfordshire Growth Board than they do to show loyalty to the local electorate that voted for them to represent their interests.

The ease with which CDC has capitulated to these demands would seem to suggest other matters take priority over their responsibility to their wards. It seems that most of them would rather have an easy life than oppose plans that would be potentially damaging to the areas they represent. It's also clear from public statements made by the leader of the council that they regard this matter as a 'done deal'.

I hope I'm wrong in that assessment and that common sense and morality will prevail in the final decisions surrounding these ill-conceived and hastily cobbled together proposals. We do have a responsibility to deal with the housing crisis but that could be achieved in so many other ways. The first of those would be to carry out a genuine review of both the true need in the area and the type of need and the ability of existing

schemes to meet those needs, rather than simply adding to local infrastructure problems by opening up green belt land to inappropriate and overbearing development.

Green belt is protected for very good reasons and we should all be prepared to defend it as a vital resource shared amongst both the human and wildlife populations. As so many people have said during this consultation, once this land is lost, it's lost forever.

For the above reasons, I consider that the proposed submission plan is Unsound, Not Positively Prepared, Not Justified and Not Effective.

Representation made on behalf of Oxfordshire Green Party and North Oxfordshire Green Party 10th October 2017

Ian Middleton

Local resident and Green Party Prospective Parliamentary Candidate for Banbury and North Oxfordshire

86 Sandy Lane
Yarnton
Oxon
OX5 1PG

Email ian.middleton@greenoxford.com - Telephone 07779 628211

Endorsed by :

John Haywood – Chair North Oxfordshire Green Party

Robert Nixon – Vice Chair North Oxfordshire Green Party

Sarah Woods – Chair Oxfordshire Green Party

Councillor Dick Wolf – Oxfordshire Green Party

David Williams – Former Oxfordshire County councillor and leader of the county Green group

References

- *Oxfordshire Infrastructure Strategy (OxIS) Stage 1 report*
- *Cherwell Level 1 Strategic Flood Risk Assessment Update*
- *Transport Assessment Evidence for Cherwell Local Plan (Part 1) Partial Review Oxford's Unmet Housing Need*
- *Comments on Oxfordshire Infrastructure Strategy Draft Consultation*
Dr Sue Roberts 16 August 2017
- *Unsound & unsustainable – why the SHMA will increase greenfield use but not meet housing needs - Report to CPRE Oxfordshire*
- *CPRE, Set up to fail: why housing targets based on flawed numbers threaten our countryside, November 2015*
- *ONS Housing summary measures analysis: 2015*
- *DCLG - Planning for the right homes in the right places: consultation proposals*