

Policy and Programmes

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Listening Learning Leading

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Your reference:
Our reference: West End and Osney Mead SPD

Date: Monday, 15 August 2022

Dear [REDACTED],

Response to consultation on the West End and Osney Mead SPD

Thank you for the opportunity to comment on the current consultation for the West End and Osney Mead SPD.

We note that the policy context for this SPD is set out in the Oxford Local Plan through Policy AOC1: West End and Osney Mead. This policy designated this as an 'Area of Change', which is defined in the Oxford Local Plan 2036 as areas of the city where significant change is expected or best directed. Policy AOC1 seeks 'high density urban living that makes efficient use of land' in the West End and Osney Mead. Policy SP1: Sites in the West End, sets out how many homes are planned to be delivered in the West End area. This policy allocates a minimum of 734 homes across 5 West End sites. Policy SP2: Osney Mead also allocates a further 247 homes within the SPD area - a total of 981 homes. In terms of uses, the Local Plan policies state that 'mixed use developments' will be sought in these locations, with employment uses, academic uses, and student accommodation alongside employer-linked affordable and market housing specifically sought in Osney Mead.

The West End and Osney Mead area provides an exceptional opportunity to provide much needed housing, including affordable housing, in a city where land for

redevelopment is scarce. Considering the significant size of the SPD area, we think that the true potential for housing of this area is far higher and that this should be recognised within the SPD.

Policy AOC1 states that 'high density urban living' will be delivered in the SPD area, yet the SPD itself only refers to building at an 'appropriate density' and neglects to refer to the high-density ambition set out in Policy AOC1. Instead, the SPD later refers to the Oxford West End Spatial Framework and Design Guide regarding the density approach in this area. Having reviewed the density approach set out in these two accompanying documents, it is noted that a vast area of the SPD area is only planned to achieve medium density development.

We do not consider medium density development to be an efficient use of land in this area, as required by paragraph 124 of the NPPF. It is also considered that page 35 of the Design Guide (which sets out the levels of density across the SPD area), demonstrates a dated approach to density, correlating higher density development with taller buildings. However, it is now widely accepted that higher density development does not always mean high rise. High density development can be achieved at lower storeys, and still be of high-quality design, and sympathetic to local character and the historic environment. Therefore, we consider that the SPD should be achieving high density housing across the entirety of the SPD site, in order to make the most efficient use of land and deliver the true potential for housing in this area.

The SPD notes that a minimum of 981 homes are expected to be delivered across the SPD area. The land use strategy set out in the SPD explains that the sites will include a 'balanced mix of uses within local neighbourhoods', including the creation of 'an innovation district'. This innovation district is described as providing 'opportunities for a range of businesses, including start-ups, studios, collaborative workspace and meanwhile uses, within the area' as well as 'formalised areas such as shared workspaces, coffee shops or food halls; childcare; public open space; or leisure facilities'.

We consider that the emphasis on the proposed innovation district, and the proposal for mixed uses other than housing, undermines the opportunity this area holds to deliver much needed housing within the city. It is at clear variance with the public commitments made by the City to focus on the delivery of additional housing units wherever it is feasible and possible to do so, and to keep under review all sites where it is possible to do this.

South Oxfordshire District Council recommends that the land use strategy in the SPD is amended to shift the balance of uses towards a predominantly residential site, rather than mixed uses. This is crucial, so that this opportunity to provide housing within the city on land available for redevelopment is grasped, to help both immediate needs and future generations. The housing figure assigned to these sites in the Local Plan is a minimum figure, so the SPD could and should seek to deliver significantly more housing, at higher densities. This is one of the most sustainable locations in Oxfordshire to deliver homes, on the doorstep of the city centre's jobs and facilities and yet the SPD fails to seek to maximise this.

In the Oxford Local Plan 2036, the Osney Mead Industrial Estate is a designated Category 2 employment site, alongside a number of small units along Park End Street and Hythe Bridge Street within the SP1 site allocation. This means that Policy E1: Employment Sites applies, which protects the identified employment uses in the SPD area from loss. We can see that the SPD area already has a number of important employment sites that are already contributing to Oxford's economy and are protected from loss. There is no demonstrated need for the creation of a new 'innovation district' at the expense of the opportunity to provide sustainable housing. The Westgate shopping centre also provides 800,000sqft of retail and leisure and a large number of jobs within very close proximity to the SPD area. The area is also within easy walking and cycling distance of the railway station, numerous bus routes and retail and leisure facilities on Botley Road, Park End Street and the City Centre. For balance and for sustainable living, the redevelopment of the SPD area should maximise housing delivery, not increase employment and other non-residential uses in an area where these uses are already dominant.

In conclusion, we consider that the vision and ambitions of the West End and Osney Mead SPD should be realigned to plan for and support maximum housing delivery in this area. The best plan for redeveloping this area would prioritise the delivery of high-density housing, shifting the emphasis away from the creation of a new 'innovation district' and other alternative non-residential uses that undermine the opportunity to focus on sustainable housing delivery, and to maximise affordable housing units across the site, making an efficient use of land as required by the NPPF.

The SPD should provide a vision for the area mainly focused on delivering much needed housing in a city where housing delivery has been low for many years. We note again that the Oxford Local Plan 2036 describes Oxford's need for more homes to be 'the number one priority of the City Council'. To address this number one priority, the City Council should prioritise housing in the West End and Osney Mead SPD area rather than seeking to artificially add to an already overheated and unsustainable level of economic growth which has been fed by the poor prioritisation of sites for housing.

Yours sincerely,

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Principal Planning Policy Officer – Planning Policy