

SUMMARY BRIEFING RE WARNEFORD DEVELOPMENT PROPOSALS

(Warneford Meadow (06/01559/OUT & 06/01560/OUT), Warneford Playing Field (06/01540/OUT) and Park Hospital (06/1561/OUT & 06/01562/OUT))

18 January 2007

1. Background/Introduction

This briefing has been prepared for city councillors (and others) as a summary of the amended outline planning applications submitted by the Oxford Health Economy (OHE) for the Warneford Meadow, Playing Field and Park Hospital sites, and of the key local objections.

The Residents' Associations of the Divinity Road Area, Hill Top Road, Highfield Area of Headington, [Mileway Gardens] and Little Oxford, and Friends of Warneford Meadow, have joined together to produce this briefing, and formulate a coordinated response to NEAC and SDCC. This is a measure of the strength of local residents' concern about the outline plans, also demonstrated by the large number of individual written objections received by the Council.

2. Summary of amended outline applications

Warneford Meadow

- **Usage:** mixed and flexible usage with a combination of Student and/or Key worker Units and/or office space for medical or health research & admin
- **Developable Area:** The proposed maximum developable area has been reduced to 50% of the total area of the Meadow (including the wildlife corridor and orchard)
- **Residential Units - key worker housing:** a minimum of 110 units occupying 30% of the developable area, and a maximum of 325 units on 100% of the developable area.
- **Residential Units - market housing:** 20% of the above residential units will be for open market housing.
- **Student Units:** a maximum of 50% of the developable area for 685 student units.
- **Office Space:** a maximum of 50% of developable area with a maximum of 12,500 m².

Park Hospital site

- **Usage:** Mixed and flexible usage with any combination of student units and/or Key worker housing and/or office space for medical or health research & admin
- **Phasing:** Building phased to allow NHS continued use of the buildings for the next five years.
- **Developable area:** proposed developable area reduced to 60% of the site
- **Residential Units: key worker housing** – a maximum of 60 units
- **Residential Units: market housing** – 20% of the residential units
- **Student Units:** a maximum of 400 units
- **Office Space:** a maximum of 7,750m² of office space.

Warneford Playing Field

- **Usage:** 150 assisted residential units
- **Developable area:** 78% of site.

3. Summary of Key Objections

3.1 The need for development and proposed uses

Student Units

- Brookes University is apparently required by the Council to provide accommodation for 1,000 second and third-year students to free up local housing stock and this may be as little as 425 (according to the recent OCC Officers' report). But there is evidence that students do not wish to live in hall-of-residence or similar institutional accommodation and prefer normal houses enabling them to live with groups of friends.
- Planning permission for student accommodation has been recently granted (or is expected) on several brown-field sites, and other smaller sites continue to be proposed. These include 275 at the TA/Slade, approx 275 prospectively in London Road (Dorset House) and 50 on Windmill Rd, and there is further scope for development of around 350 on the Brookes-owned site on Marston Road. **This totals 950 student units** already in the pipeline. It therefore appears that fewer than fifty additional units will be needed to meet Brookes' requirements.
- Also, Brookes have predicted a 3% reduction in UK undergraduates and a 10% reduction in overseas students, the key group requiring accommodation.

Key Worker Units

- The Oxford Health Economy's 2006 staff survey and revised Key Worker Housing paper provide little evidence of potential take-up. We recognise that providing subsidised key worker housing may help recruitment and retention; but many key workers do not want to live in NHS 'ghettoes' and don't want the restrictions associated with shared ownership or renting.
- Key worker housing requires subsidy (at least £30,000 per dwelling) and there is no evidence that the NHS has budgeted for this and is unlikely to be able to afford this in the context of severe local financial constraints.
- Many single-earner key worker households still couldn't afford housing in inner Oxford even with subsidy, as it still requires income >£30k pa.

Office Space (for medical/healthcare research, education or admin)

- Office space [B1 use] is not in short supply in Oxford and the applicant has acknowledged this to be the option with the most significant traffic impact. Office space should be developed at a public transport node. All three application sites are unsuitable.

Assisted Housing (150 units on playing field)

- Assisted housing is not designated on this site in the approved Oxford Local and the inspector's report states "Development of the playing fields...should be limited to replacement mental health care facilities. Planning permission will not be granted for other uses."
- Assisted (Sheltered Housing), should there be a clearly demonstrated need, could easily be developed elsewhere in Oxford and development on the playing field site should be restricted to its approved use, possibly to include wider key-worker housing.

3.2 General Planning Matters

- Warneford Meadow is a greenfield site. Government and local policies state that greenfield sites should not be developed unless there is no alternative brown field site. No sufficient evidence of lack of brown field sites has been produced and the sequential test has not been applied. Indeed, sufficient brown field sites can, and have already been identified to meet the need for student accommodation and key worker housing.
- Warneford Meadow is the land designated as **DS87** in the Local Plan (OLP). The area is clearly identified. The **gross area of DS87 is 4.81ha NOT 7.93ha** as the applicants state (*including* the area of orchard and the belt of trees on the back of Hill Top Road, both of which the OLP says must be protected from development).
- The applicant's definition of the Warneford Meadow and their calculations of the site area do not correspond with the Local Plan and are inaccurate. They take the area of DS87 and NE20 together, as well land adjacent to Jack Howarth House (also not part of DS87), and conclude the whole site is 7.60 hectares (18.78 acres).

- NE20 (wildlife corridor) is the designation for land alongside the Boundary Brook, running between the Churchill and the DS87 Meadow and along the edge of the golf-course. The OLP makes clear that NE20 is not developable. It is therefore illogical for this area to be included in the calculations of the gross area of the site.
- The OLP says that only 50% of DS87, i.e. the Meadow (or field as described in OLP), is developable. 50% of DS87 is 2.14 hectares, not the 3.8 hectares proposed by the applicants.
- As the Council has accepted, a proportion of the wildlife corridor in NE20 on the Churchill side has been lost to the cancer centre development, there will need to be a compensatory wildlife corridor area taken out of DS87.
- The amended proposal for a secondary 13m wide access road through the Playing Field cuts through the protected orchard. This should not be allowed.
- The proposed balancing ponds for flood management are outside the applicant's 50% development area and inside the NE20 protected wildlife corridor.

3.3 Traffic, Parking and Transport

- The applicants acknowledge that their Traffic Impact Assessment (TIA) still does not take into account the considerable increase in traffic generated by the relocation of the Radcliffe Infirmary to the JR & Churchill Hospital sites. The new regional cancer centre, 10 additional operating theatres and a large private patient wing on the Churchill site will add further congestion.
- The applicant acknowledges that the area around and linking all three sites currently suffers significant traffic congestion, particularly at peak times; all the proposed uses will increase congestion, with the worst being office use.
- Despite Oxford Brookes' attempts, preventing students from bringing cars into Oxford is ineffective and unenforceable. Local residents continue to experience significant parking problems during term-time, which will only be exacerbated.
- The low proposed provision of parking facilities for student accommodation and office space will result in further overspill parking, exacerbating existing problems and coinciding with increased overspill parking by hospital staff, patients and visitors. The provision of more off-street parking is not necessarily the solution as this may encourage car-use.
- The bus service is full at peak times and often delayed by traffic congestion.

3.4 Environment, Ecology and Recreation

- Development will remove a much valued local recreational facility (with sufficient use to justify an application for registration as a Town Green).
- PPS3 (the Government policy statement on planning for housing) says "*Developing more housing within urban areas should not mean building on urban green spaces*". Warneford Meadow is such an urban green space, providing a "green lung" to reduce air pollution and space to conduct healthy outdoor activity within 300m of residential areas, as recommended by government policy.
- The meadow supports a large number of species protected under the Wildlife and Countryside Act (WCA 1981), and several are protected under the Berne convention and various European Directives, eg song thrush, skylark, redwing, fieldfare and grass snake.
- Development of the meadow will reduce the value of the designated wildlife corridor and damage wildlife habitat along the corridor and into the Lye Valley SSSI.

3.6 Financial considerations

- Implied or actual use of funds generated through sale of land is not a relevant planning consideration and should not be part of officer's or councillors consideration of these proposals.
- The attempt to gain officers', councillors' and residents' support for the developments on the basis that financial receipts from the sale will be used to improve patient services at the Warneford Hospital is inappropriate.

- It is important that the public and councillors ensure they obtain accurate information on this point. NHS assets are owned nationally and not by individual hospitals or Trusts. There can be no guarantee that any capital investment will be used locally. In summary:
 - the Playing Field and the Park Hospitals sites are owned by the NHS and registered as capital assets of the OBMHT, upon which they pay capital charges (from revenue) back to the Department of Health.
 - The receipts from the sale of the Playing Field and Park sites may well transfer back to Oxon & Bucks Mental Health Trust, as they are listed as part of their assets to support the financial viability of their application for Foundation Trust status.
 - The Meadow is owned by the Secretary of State for Health and is not currently an NHS asset. There is apparently an oral agreement that the SoS will transfer ownership to the NHS - and to the Oxford Radcliffe NHS Trust (ORH), where it would be counted as their capital asset.
 - Receipts from sale of the Meadow cannot be guaranteed to go to OBMHT. There will be other NHS organisations locally and regionally who will have an equally urgent need for capital funding.
 - All capital applications are subjected to rigorous business-case approval process, by the SHA, and NHS organisations have to demonstrate they have a sufficient revenue surplus to afford the development and pay back the capital charges.

CONCLUSIONS and RECOMMENDATIONS

The Residents' Associations most affected by the 3 proposals have come together and collectively propose the following solution

1. **Warneford Meadow (DS87)** - that the City Council **rejects** all proposals for development on the Meadow. It is a greenfield site, in an awkward location, performing important hydrological, ecological and recreational functions, and should not be lost to development. The need for the development proposed and the permitted uses agreed in the local plan are no longer valid and can be met in more appropriate locations.
2. **Warneford Playing Field (DS86)** - that – subject to an independent assessment of the traffic assessment, and to any necessary junction improvements being made - the City Council approves use for student and/or key worker housing. The Field is the most suitable site for student accommodation as it gives easy access to Gipsy Lane and the Student Union, and bus links to the city centre, with least impact on residential areas. It is a 1.49 hectare site which could accommodate up to **498 student units** at a density of **334 per hectare**, (the average for 5 recent student development proposals in Oxford), or **75 key worker units** at a density of **50 per hectare**. Assisted housing is not permitted usage in the OLP, and evidence of need for it has not been provided.
3. **The Park Hospital Site (DS64)** - that – subject to similar conditions - the City Council approves a minimum of **100 key worker housing units** on the Park Hospital site at a density of **50 per hectare**
4. **Office Space** – that the City Council rejects any development of office space on any of the 3 sites. This would generate the most additional traffic in a congested area and is not needed.

Jointly submitted by: Divinity Road RA (DRARA), Hill Top Road RA, Highfield RA, Mileway Gardens RA, Little Oxford RA, and the Friends of Warneford Meadow

Date: 18th January 2007

For further information contact
 Dr Rebecca Miles, 07771 541890, rebecca.miles1@btinternet.com