

Oxfordshire Plan 2050 Policy Options Consultation

Regulation 18 Part 2 – Consultation response form

Please Return to the Oxfordshire Plan Team by Friday 8th October 2021

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This form has two parts-

PART A – Personal Details

PART B – Your Representation(s).

PART A

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PART B - 1

To which part of the consultation does this representation relate?

General Comment Paragraph Policy Option Spatial Option

What is the nature of your comment?

Support Object Observation

Please provide details of your response as necessary:

This document includes our response to the consultation is in the same order as the Oxfordshire Plan Regulation 18 (Part 2) Consultation Document and therefore does not attempt to prioritise our comments.

PART B - 2

To which part of the consultation does this representation relate?

General Comment

Paragraph

1

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Paragraph 1 states that *“Oxfordshire is a unique and special place shaped by its beautiful and varied landscapes, rich cultural heritage and areas important to nature conservation. But there are also ... challenges linked to climate change, congestion, housing affordability and threats to the natural, built and historic environments.”*

This is very true, but adding an additional home for every two already existing in Oxfordshire (The transformational option of 153,000 new homes on top of the 300,803 homes in Oxfordshire in April 2020) will certainly transform the county. The varied landscapes will be removed and replaced by thousands of almost identical little boxes and climate change targets will be missed, congestion increased and threats to the natural and historic environments made real.

This will leave the centre of Oxford and (hopefully) the AONB as unique but mean that most of the rest of the county will be modern housing developments with few if any unique characteristics.

Building additional dwellings does not improve housing affordability unless these homes are government funded social homes. Developers will always build for profit and will only release new homes for sale when market conditions ensure that sufficient profit can be made.

The impact of carbon reduction targets (when finally mandated on the construction industry) will require much more effective insulation, more efficient heating, water recycling capabilities and less use of building materials such as concrete and will inevitably increase the cost of new homes making them even less affordable.

There is no such thing as “good growth” at this speed and of this scale.

Local and by-election results over the last couple of years suggest that many residents of Oxfordshire share our concerns and we ask our elected representatives to engage robustly with Government to rethink its strategy for Oxfordshire and focus instead on their election promise of levelling up the UK.

PART B - 3

To which part of the consultation does this representation relate?

General Comment

Paragraph

9

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Paragraph 9 refers to the *"2014 Strategic Housing Market Assessment."*

This was a document produced without any consultation and should not be used now as the basis for any future plans.

PART B - 4

To which part of the consultation does this representation relate?

General Comment

Paragraph

32

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

The Strategic Vision 2050 Guiding Principles detailed on page 16 and shown here are very challenging targets and we do not believe that the plan as written will come close to achieving this ambition. Paragraph 32 includes the statement that *“the Guiding Principles help define the role that place-making might play in delivering the Strategic Vision outcomes. The Strategic Vision is being used as a tool – built on a wide consensus – to inform development of the policies, spatial options and overall spatial strategy in the Oxfordshire Plan, with appropriate weight attached to it”*

The plan needs to be clear about the impact that it aims to have on each of these principles, how this will be achieved, what support from which external parties are necessary to make it happen, how the impact will be measured and monitored and what actions will be taken if the impact is not being achieved.

Without this, we object to the spurious inclusion of these principles in the plan.

Guiding Principles

1. *We will reverse the impacts of climate change.*
2. *We will create the conditions to support a world-leading and innovation rich economy which is clean, prosperous, diverse, inclusive, successful and sustainable.*
3. *We will improve our overall health and wellbeing and reduce inequalities.*
4. *We will enhance our natural environment.*
5. *We will reflect our distinctive and diverse communities and places.*
6. *We will deliver homes that meet the needs of current and future generations.*
7. *We will embrace technological changes.*
8. *We will expect high-quality development.*
9. *We will help people to help each other by supporting communities and individuals to achieve positive change for themselves.*
10. *We will maximise the benefits of strong collaboration within Oxfordshire.*
11. *We will proactively and positively engage and collaborate beyond Oxfordshire.*

PART B - 5

To which part of the consultation does this representation relate?

General Comment

Paragraph

58

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

The Oxfordshire Plan Objectives detailed in paragraph 58 on page 29 and shown here are ambitious.

The plan needs to be clear about how these objectives will be achieved, what support from which external parties are necessary to make it happen, how the impact will be measured and monitored and what actions will be taken if the objective is not being achieved.

Without this, we believe the plan is unsound.

Oxfordshire Plan Objectives

1. To demonstrate leadership in addressing the climate emergency by significantly reducing greenhouse gas emissions.
2. To conserve and enhance Oxfordshire's historic, built and natural environments, recognising the benefits these assets contribute to quality of life, local identity and economic success.
3. To protect and enhance Oxfordshire's distinctive landscape character, recreational and biodiversity value by identifying strategic green and blue infrastructure, improving connectivity between environmental assets and securing a net gain for biodiversity.
4. To improve health and wellbeing by enabling independence, encouraging active and healthy lifestyles, facilitating social interaction and creating inclusive and safe communities.
5. To sustain and strengthen Oxfordshire's economic role and reputation by building on our key strengths and relationships.
6. To ensure that the benefits and opportunities arising from Oxfordshire's economic success are felt by all of Oxfordshire's communities.
7. To meet Oxfordshire's housing needs, including affordable housing, and to ensure that housing delivery is phased appropriately to support the needs of our communities.
8. To ensure that new housing is flexible to meet the varied needs of people through all stages of life.
9. To deliver high quality, innovatively designed development that ensures efficient use of land and resources.
10. To reduce the need to travel and to support people in making sustainable transport choices by providing inclusive, integrated, safe and convenient pedestrian, cycle and public transport infrastructure linking communities.
11. To ensure that communities are digitally connected and that innovative technologies are supported.

PART B - 6

To which part of the consultation does this representation relate?

General Comment

Paragraph

73

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Paragraph 73 states that *“The Oxfordshire Plan aims to deliver against its climate change ambitions through a range of approaches including a reduction in greenhouse gas emissions (improved building standards, increased renewable energy generation) and minimising vulnerability to and improving the resilience of communities and the natural environment (Natural Capital, Nature Recovery, Water Environment and biodiversity net gain).”*

Yet the ambition is for net zero carbon emissions before 2050. This cannot be achieved simply by improving building standards unless all existing homes are going to be demolished and replaced by zero carbon dwellings. Any new development will add to gas emissions in construction and ongoing usage as most of the homes planned in existing local plans have already received outline permission and will therefore be built to the construction standards prevalent at that time.

The plan is therefore unsound.

As paragraph 79 states *“There are a significant number of planned houses in the pipeline that will be constructed to existing building standards and will therefore contribute less to achieving the ambitious national and local carbon reductions targets that have been set.”*

This is untrue – new developments will not contribute less but will actively generate carbon counteracting any other reduction initiatives.

The government commitment is only to ensuring that the Future Homes Standard will *“require new homes produce at least 75% lower CO2 emissions compared to those built to current standards”* – not to reducing emissions to zero.

Offsetting is not reducing carbon but simply moving it elsewhere. If we are to save the planet we must reduce emissions to zero not offset them.

PART B - 7

To which part of the consultation does this representation relate?

General Comment
Option

Paragraph

90

Policy Option

01

Spatial

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Paragraph 90 states that *“the preferred policy approach is to define an Oxfordshire-wide definition for net zero carbon design and construction for development in Oxfordshire. This will assist in achieving the County’s objectives in achieving net zero carbon emissions over the lifetime of the Oxfordshire Plan...”*

Yet as stated on page 40 *“As construction waste accounts for the largest proportion of waste within the Oxfordshire waste cycle, circular economy principles are relevant to the Oxfordshire Plan”*

The link referred to on this page is from 2017 and there doesn’t seem to have been anything new since then and although the general principle of a circular economy is accepted, no details of how this can be achieved in the construction industry appear to be available.

The paper included in the consultation documents (which is not referenced in the plan) but is available here <https://oxfordshireplan.org/wp-content/uploads/2021/08/Circular-Economy-in-Oxfordshire-FINAL-Report-Copy-2.pdf> does not refer to the construction industry and is therefore not specific to the plan.

Therefore a reliance on circular economy principles for net zero carbon construction is unsound.

Policy Option 01 states that

“Carbon offsetting would only be permitted where it is demonstrable that net zero carbon cannot be achieved on site.”

“A financial contribution based on defined calculation would be made to carbon offsetting projects including off-site renewable energy generation or carbon sequestration consistent with defined natural capital and nature recovery approaches defined in the Plan.”

If a financial contribution would be required from the construction industry then this will increase the cost of construction thus making new homes even less affordable and compromising one of the key objectives of the plan of making homes more affordable.

PART B - 8

To which part of the consultation does this representation relate?

General Comment Paragraph Policy Option 01-1 Spatial Option

What is the nature of your comment?

Support Object Observation

Please provide details of your response as necessary:

Alternative Policy Option 01-1 in paragraph 91 states that *“One alternative policy option is to defer standards for the design and construction of new buildings to district local plans...”*

But as stated in paragraph 92: *“This is not a preferred option as different targets and timescales for achieving net zero carbon development in local plans could hinder efforts to achieve net zero carbon emissions in Oxfordshire during the lifetime of the Plan.”*

Therefore this policy would be unsound.

PART B - 9

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

01-2

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Alternative Policy Option 01-2 in paragraph 93 states that *“Another alternative is to defer guidance on sustainable design and construction to building regulations and the Future Homes and Future Buildings Standards.”*

But as stated in paragraph 94: *“This is not a preferred option as failure to introduce more stringent national standards for the design and construction of new development could hinder Oxfordshire’s efforts to achieve net zero carbon emissions during the lifetime of the Plan.”*

Therefore this policy would be unsound.

PART B - 10

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

02

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy 02 states that

“... Developments would be required to maximise energy efficiency whilst integrating renewable and smart energy technologies in order to minimise energy demand.

Installation and integration of these technologies should be delivered at the development stage to avoid more costly retrofitting after completion. ...”

Yet paragraph 114 states that *“The future of energy in Oxfordshire may have implications for the future distribution of development, and delivery of strategic scale renewable energy generation will have land use implications.”*

If the plans require very large increases in housing and employment both requiring increases in energy, additional land will be required for energy generation. Land is a scarce resource in Oxfordshire and all these additional uses will further reduce the land available to grow the food required by this increasing population and the trees and plants required to absorb carbon.

Without detailed proof of where this land will be found this plan cannot be achieved and must be unsound.

As paragraph 115 states *“it is important for the Oxfordshire Plan to consider future infrastructure needs and land use implications of future energy infrastructure, particularly increases in renewable energy generation capacity, to set a framework for delivery as part of a sustainable spatial strategy for Oxfordshire.”*

Policy option 02-2 paragraph 120 states “Another alternative policy option is to set a percentage target for renewable energy generation in new developments e.g. minimum 10%.”

This is not acceptable as it simply ignores the problem.

PART B - 11

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

03

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

We believe that Policy O3 is not ambitious enough as it states:

“The Oxfordshire Plan would seek to require the most ambitious minimum water efficiency standards possible for new development.

“For residential development, this would include exploring the potential to go beyond the current optional requirement of 110 litres per person per day. (For example, RIBA 2030 Climate Challenge Targets of 75 litres per person per day.)

“For non-residential development, this would include exploring the potential to set minimum water efficiency standards for some uses. (For example, RIBA 2030 Climate Challenge Targets or BREEAM standards.)

“The Oxfordshire Plan would also require development at strategic growth locations to maximise water efficiency through the delivery of community-scale rainwater harvesting and grey water recycling schemes.”

Such phrases as “*exploring the potential to*” provide a very easy get out clause to construction companies and should not be included in a policy.

In addition we believe that all development (not just those “*at strategic growth locations*”) should be required to delivery rainwater harvesting and grey water recycling.

PART B - 12

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

05

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 05:

Protection and Enhancement of Landscape Characters

"The Oxfordshire Plan would establish a positive strategy for the conservation and enhancement of landscape and townscape features at a county-wide landscape scale, taking account of topography, vegetation, tranquillity, light pollution, dark skies, settlement pattern and landscape protection status. Landscape character and visual impact assessments would be required to support major new developments and urban extensions as well as the preparation of the Oxfordshire Plan itself and subsequent plans and strategies guiding development in Oxfordshire.

Regard should be had to the Oxfordshire Wildlife and Landscape Study and relevant landscape character studies relating to parts of Oxfordshire."

The document concentrates on the AONB but as stated in paragraph 156 *"Oxfordshire's landscapes are particularly important in defining the character of the county and what makes it distinctive."*

Paragraph 162 states that *"The significance of any impacts on landscape are dependent on the sensitivity of landscape and the nature of any changes proposed. An understanding of such sensitivities will be central in guiding the Oxfordshire Plan spatial strategy."* Paragraph 164 goes on to state that *"Further detailed evidence on landscape sensitivity and impacts will be required"*. Without this evidence in place and details of the *"positive strategy"* referred to above this is just words. We object to this policy without further details of the positive strategy being available for consultation.



PART B - 13

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

07

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 07: Nature Recovery

We support this policy and the introduction of protection for “recovery zones” which provide an opportunity to plan more holistically for ecological connectivity at the landscape scale.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

08

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 08: Biodiversity Gain

We support this policy and the minimum 20% target for biodiversity net gain across the whole of Oxfordshire to protect, enhance, restore, increase and connect the natural environment and secure measurable net gains in biodiversity.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

09

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 09: Natural Capital and Ecosystem Services

We note paragraph 249 which states that *“Green infrastructure is a key part of natural capital, though natural capital also includes intensive farmland, which is not usually considered as green infrastructure...”*. Also paragraph 252 *“Applying natural capital approaches will help integrate the value of nature in all decision-making and develop a better understanding of impacts and dependencies on nature...”*.

We strongly support the *“recently compiled business case for green infrastructure investment in Oxfordshire [which] identified a number of headline benefits.”*

But we are concerned that the Policy is not strong enough.

Although it states that *“The Oxfordshire Plan would establish a Natural Capital Approach to planning in Oxfordshire, placing natural capital considerations at the heart of planning for development, infrastructure, and environmental enhancements including nature-based solutions.”* It goes on to say that *“Local plans should be guided by the baseline assessment of natural capital assets and ecosystem services developed for Oxfordshire to influence the spatial distribution of development and investment in green infrastructure and nature-based solutions.”*

We believe that this should be strengthened to ensure that Local Plans are more than “influenced” and must apply a Natural Capital Approach.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

11

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 11: Water Quality

We support this policy but would also like some reference to the need to ensure that water leakage is reduced and grey water usage encouraged to ensure that usage of this scarce resource is optimised.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

12

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 12: Air Quality

We support this policy and would stress the paragraph which states *“Development would be expected to improve air quality wherever possible. For example, by: supporting walking, cycling and public transport and reducing the need to travel ...”*

We have thousands of homes being built in OX12 but little extra employment and therefore most of the residents of the new homes need to travel to areas of employment. This increases carbon emissions and should be minimised.

We consider that the paragraph which states *“Where it is not possible to avoid negative impacts, consider measures to reduce negative impacts. For example, through traffic and travel management, careful design and green infrastructure provision”* provides a “get out clause”. Travel management usually is a way of paying lip service by providing a short guide to alternative means of transport, most of which are impractical to most residents who have to ensure that their children get to schools (often in opposite directions) and that they get to work within a reasonable timeframe.

This paragraph should be rewritten to ensure that practical carbon reducing alternatives must be provided to counteract negative impacts.

PART B – 18

To which part of the consultation does this representation relate?

General Comment

page 87

Paragraph

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

 X

Please provide details of your response as necessary:

We are unsure why the heading on this page of the document is "Policy Option 13 - Flood Risk" as we believe that Policy Option 13 is "Healthy Place-Shaping and Health Impact Assessments".

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

13

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 13 - "Healthy Place-Shaping and Health Impact Assessments".

We believe that as a minimum the policy should include the following principles:

- **Explicitly address the existing and projected health and wellbeing needs of an area and consider how existing community assets could be enhanced to help promote healthy life expectancy. Help to reduce obesity and levels of physical inactivity through the provision of good-quality playing pitches, parks and open space, sports and active leisure facilities, and outdoor gyms that are accessible to all.**
- **Provide opportunities for people to become more active through the design of street layout and public realm to encourage walking and cycling as priority modes of transport; create and enhance cycling and walking networks as well as ensure connectivity between new development, local services and facilities, access to parks and open spaces and public transport.**
- **Reduce social isolation and loneliness through providing good-quality social community infrastructure which encourages opportunities for social interaction and helps to support the growth of friendly communities. Also, to create community development strategies which contain actions to encourage community cohesion, both within the development itself and between the new development and existing communities.**
- **Secures access for those with disabilities.**
- **Make it easier for people to make healthier food choices by providing allotments and other opportunities for food growing such as community gardens, school allotments, community orchards, roof gardens, edible landscaping around new schools and housing developments involving fruit and nut trees and planting.**

PART B – 20

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

14

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 14 – Health Insurance (page 90) or Health Infrastructure (page 91)
We strongly support this policy.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

15

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 15: High Quality Design

We support this policy but would suggest that the principle that “All developments over 700 units to be led by a comprehensive masterplan together with a design code” should apply to all developments over 300 units.

We strongly support the principles that require:

- All housing, business and retail units to contain energy management systems, renewal energy provision, grey water schemes, full fibre broadband connection to support home working, home learning and EV charging points.
- Schemes to be designed to reduce the need to travel, linked to the LTCP area strategies.
- Active travel measures to be supported and 20-minute neighbourhoods to be created that encourage walking and cycling connections to regional and national routes.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 16: Leisure, Recreation, Community and Open Space Facilities

We support this policy but would suggest that the principle in paragraph 328 that “seeks to protect the existing indoor and outdoor sports facilities and open spaces within the County. Those within built-up areas are most likely to be at threat from other forms of development. A policy which acknowledges the importance of retaining existing open spaces within built-up areas and seeks to protect them would do more to secure the future of these types of facilities within the built-up areas” be added.

To which part of the consultation does this representation relate?

General Comment

Paragraph

330

Policy Option

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

We strongly support the sentiment included in this paragraph that:

“With planned new development, the demand for travel is expected to increase and it is therefore important that this is managed, and plans are put in place to both support sustainable transport choices and reduce the need to travel where possible. In addition, the wider objectives and targets on climate action mean that there will be a need to ensure the Oxfordshire Plan supports a move towards a transport network across Oxfordshire and beyond that significantly reduces carbon emissions over the next few years. In practice, this will mean significant enhancement to bus and rail services, and a focus on delivering comprehensive active travel networks that enable people to choose walking and cycling for more local journeys, securing health gains as well as supporting the tackling of climate change.”

But would point out that the issue already exists and the need to move towards a transport network across Oxfordshire and beyond that significantly reduces carbon emissions does not depend on more new development.

The need for significant enhancement to bus and rail services, and a focus on delivering comprehensive active travel networks that enable people to choose walking and cycling for more local journeys is already here and not a future requirement.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

17

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 17 – Towards a Net Zero Transport Network

Whilst we support the bullet points listed in this policy, the first paragraph of the policy states that “All development proposals should be planned to both take account of, and take opportunities to support delivery of an Oxfordshire net zero carbon emissions transport network ...” seems a little weak. Could this be strengthened in some way?

We are also concerned that the final paragraph doesn’t actually include any principle as it states “It will be important that the location and planning for new development takes into account the more detailed policies within the County Local Transport and Connectivity Plan (LTCP), and where relevant other policy, both at a sub-national and national level. In particular, it will be important to take into account and support strategic cross-boundary proposals that contribute towards delivering a net zero carbon system, such as strategic public transport improvements like East West Rail.”

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

18

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 18 – Sustainable Transport in New Development

We strongly support the principles in paragraphs 344 and 345

“Planning for transport also needs to be integrated into and support wider place-shaping principles.

Paragraph 104(a) of the NPPF (2019) states that planning policies should, ‘support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.’

“More recently, the concept of 15 or 20 minutes neighbourhoods has come the fore, and is about creating places where resident’s everyday needs, such as education, employment, community health and wellbeing facilities and recreation opportunities can be met within a short walk or cycle ride. Both the planning guidance and 20-minute neighbourhood concept supports the hierarchical approach to planning for transport and movement, through reducing the need for longer-distance travel, particularly by private vehicle.”

But we are concerned that these paragraphs are not reflected strongly in the policy option. Would it not be possible to require local plans to prioritise sites based on the proximity to residents’ everyday needs?

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

22

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 22:- Supporting the creation of jobs

Paragraph 378 states that “... A central piece of evidence for the Oxfordshire Plan is the Oxfordshire Growth Needs Assessment (OGNA) which considers the housing need figure across a range of scenarios, including options that consider the relationship to economic growth.” Yet no link to this document is shown in the draft plan.

Apparently this key piece of evidence has been approved by the Councils across Oxfordshire without any public consultation. **We therefore object to this evidence being the basis of the plan and ask that a separate consultation on this document be initiated immediately.**

Paragraph 383 States that “one of the purposes of the Oxfordshire Plan is to consider the level of employment growth and the links to housing need over the Plan period. There are a number of ways to identify the requirements for job growth figures, but there is considerable uncertainty later on in the Plan period, from 2040 onwards.”

Paragraph 389 then states that “the OGNA calculations could then be broken down into tranches for the local planning authorities to use (e.g.10 years) in the preparation of local plans. Figures provided for each tranche would have to be indicative, and subject to review by local plans due to the complex nature of job creation and to allow for individual circumstances to be taken into account.”

Yet the Policy Option 22 proposes that “the Oxfordshire Plan could use the OGNA scenarios to consider the level of jobs growth and identify the employment growth figure for Oxfordshire for 2020-2050. This would align job creation calculations with the housing growth scenarios that the OGNA considered.”

We object to this policy on the basis that indicative figures “subject to review by local plans” will suddenly become concrete and mandated for inclusion in Local Plans.

The figure on page 113 from the OGNA purports to show a range of employment projections for Oxfordshire based on (2010=100) yet the figures for 2010 show an outturn of less than 90. If this is an example of the accuracy of the document then there should be a large number of questions and the document should be subject to peer review.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

23

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 23: Protection of Economic Assets

We support this policy – particularly the paragraph which states *“The loss of existing economic assets would not generally be supported unless proposals are in accordance with the relevant development plan policies across the districts and city concerned with the loss of economic assets.”*

The loss of existing employment sites can have a significant detrimental impact on the ability of a community to move towards zero carbon objectives if residents have to travel to work.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

24

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 24: Town Centre Renewal

We support this policy – particularly the paragraph which states *“We would encourage the preparation of a town centre strategy between the local planning authority, landowners and businesses to consider challenges and opportunities on a holistic basis and as the means to take local level decisions about the most appropriate boundary of the areas to be devoted to primary and secondary retail, recognising that it may be most effective to reduce the area and consolidate and strengthen the remaining zone..”*

The changing role and nature of retail in town centres may mean that many of our towns and smaller centres may become dormitories without employment opportunities, requiring residents to travel for work and shopping, and would further increase the level of isolation within these communities.

To which part of the consultation does this representation relate?

General Comment Paragraph 433-437 Policy Option Spatial Option

What is the nature of your comment?

Support X Object Observation

Please provide details of your response as necessary:

Whilst objecting to the calculation, and therefore the figures estimated for the housing need (see Policy 28 comments below) we support the statements made in the following paragraphs

We support the statements made in paragraph 433 which recognise that much of the housing growth has already been committed in the current local plans as it states:

“The next tranche of growth has already been committed in the 2020 – 2031/5/6 period of the Oxfordshire Plan through the City and District's planning consents. In a number of Districts, committed growth associated with consents continues into the period after 2031/5/6 due to the delivery period of strategic development sites and windfalls. In the next phase of Plan making the total of these commitments will be taken off the OGNA scenarios to present the 'residual' figure. This is the housing requirement that we will need to plan for.”

We also support the clarity provided in paragraph 437 where it states:

“the range of new growth we intend to test in the preparation of the Regulation 19 Plan is of the order of 16,000-68,000 homes (not 101,000-153,000). This lower range is the basis for looking at broad areas of growth through the Oxfordshire Plan 2031/5/6 to 2050. i.e. over a 20-year period, after the end of the current adopted local plans. Note: In considering this issue in the preparation of the Regulation 19 Plan we will use the most up to date data from AMRs from each local planning authority to ensure we use a common basis for the calculations.”

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

28

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 28:- Homes: How Many? Commitments and Locations

On Page 131 the plan states that

“Through this consultation on the Regulation 18 Part 2 stage of the Oxfordshire Plan, the scenarios for the total housing requirement figure 2020-2050 (the OGNA) need to be considered and views are sought.

“The Regulation 19 stage will consider the OGNA range taking the level of committed growth into account using AMRs, its ongoing delivery as well as the identification of a residual figure that is broken down into tranches (e.g. 10 years).”

We object strongly to the methodology used to identify the growth figures in the Oxfordshire Councils Growth Needs Assessment as shown below:

1. Starting point:

According to Oxfordshire Insight (<https://insight.oxfordshire.gov.uk/cms/population>) the latest (mid-2020) Office for National Statistics (ONS) estimate (MYE) of the population of Oxfordshire published on the County Council website was **696,900**.

The figures used in the OGNA report in Section 7 Oxfordshire’s Housing Need Using the Standard Method show a starting point for 2020 of 720,560 so we already have a discrepancy of 3.4%.

2. Adjustments:

The approach taken amends the population figures provided by the ONS by using the patient registers across Oxfordshire but admits that

“It should be noted that it is not recommended to use the PR data to establish the size of the population at a point in time: this is because this source does tend to overstate population as some people may be registered with a GP in more than one location – this tends to particularly impact on areas with larger numbers of younger people and student populations.” (Page 27)

It goes on to state that *“it can be observed that whilst the MYE showed population growth of 3% in Oxford (the lowest in the county) the PR data shows an increase of 14% (the highest in the county).”* (Page 28)

Surely it is therefore obvious from these statements that given the student population of Oxford the Patient Record (PR) is very likely to overstate the population and should not be used.

We therefore object to the use of this data to adjust the ONS figures on which the projections are based.

As new Census data will be available shortly we strongly support the replacement of ALL baseline data with the new census data.

We object to the “transformational” calculations as these would impact the ability of the County to achieve zero carbon and would also have significant impacts on the “*landscapes, rich cultural heritage and areas important to nature conservation*” simply due to the magnitude of growth (50% on 2020 figures or 1 new dwelling for every 2 dwellings in existence in 2020).

Even the Standard Method provides a 34% growth in the housing levels in the County in 30 years and will have a very significant impact on the environment in which we live.

We support the idea of “*the identification of a residual figure that is broken down into tranches (e.g. 10 years).*” But would make it clear that **the residual figure should be used for the periods beyond the existing local plan targets i.e. 2031 – 2040 and 2040 – 2050 and it should be clear that no permissions will be granted until all the areas of development (including brown field sites) in existing plans have been progressed in line with existing trajectories.**

Any delays in achieving housing growth targets are likely to reflect market conditions and this should not be seen as a free-for-all for developers to create land banks of permissions.

Unless planning law changes and those sites with planning permission are forced to build to Zero Carbon standards we should aim to restrict permissions to those necessary to meet annual targets to ensure that the most up-to-date construction standards are applied.

Current construction techniques including the movement of construction waste (including soil etc) are very carbon intensive and most of the resulting housing has poor efficiency so as far as possible further permissions should be resisted unless the best energy efficient standards are met.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

29

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 29 - Urban Renewal

We support the proposal that this policy would include *“support for proposals that include a package of measures to renew and replace existing buildings (i.e. those that are under-utilised, energy inefficient or are degraded or derelict), with more modern higher quality housing to achieve higher densities where appropriate, as well as being designed to be more energy efficient and support healthier living.”*

But simply “more energy efficient” is not enough, we should be aiming for maximum energy efficiency and zero carbon. It is already possible for this to be achieved in new dwellings and our ambition should be to achieve this in all new homes as quickly as possible.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

30

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 30 – Affordable homes

We support the statement in paragraph 447 that *“Affordable homes are greatly needed across Oxfordshire.”*

And would make it clear that by this statement we mean both the old definition ‘Households have traditionally been identified as having an affordable housing need where they cannot afford to rent or buy housing without support’ as well as those households included in the 2019 NPPF definition (i.e. households who can afford to rent a home but aspire to buy, and need support to do so).

We would object to this policy unless it included a specific requirement for Local Plans to include a breakdown of the percentage requirement for affordable homes into the two separate requirements. The sentence in the current ‘Policy option’ *“Tenure mix targets and affordable housing requirements (expressed as a percentage) will be for local plans to decide in the light of local evidence.”* In not clear enough and should include the requirement to provide a breakdown by tenure.

We support the statement in paragraph 448 that *“other initiatives such as local authority house building (supported by national Government) could help to boost affordable housing delivery, and also help councils to return to their historic role as provider of homes”* and would request that the plan consider ways in which these initiatives could be put in place.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

32

Spatial Option

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Policy Option 31: Specialist Housing Needs

Whilst we very much support the need for the delivery of specialist housing we **would object to this policy unless it included a specific requirement for Local Plans to include a breakdown of the requirement for specialist housing by type within each local plan.**

We support the alternative policy option detailed in paragraph 466 and believe that these should be minimum requirements for these specific types of specialist homes which could be enhanced in Local Plans. We would however ask that the specific requirements for lifetime homes also be included as a type in this context.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

1

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Option 1: Focus on opportunities at larger settlements & planned growth locations

Whilst we support the focus on larger settlements and planned growth locations we would object if this policy included Wantage and Grove without a commitment for much more LOCAL employment.

Milton Park and Harwell are outside the 20 minute zone for cycling or public transport and the area designated in the current local plan for employment in North Grove is likely to support further housing. Even with Grove station the idea of 20 minutes from dwelling to employment will be very hard to achieve.

Areas of employment associated with new developments in OX12 are currently limited to construction workers, two new care homes and one new primary school, nowhere near sufficient to justify the 7,500 new homes currently planned and many more in the eyes of developers.

As paragraph 343 states *“Unfortunately, historically much development across the country and indeed parts of Oxfordshire has been planned and delivered with a focus on providing for and mitigating the impact of car-based travel. The RTPI Net Zero carbon report makes clear that there is therefore a need to re-examine how land-use and transport planning are integrated, if we are to achieve our zero carbon vision”*.

The justification on page 151 states that *“this option would continue to focus growth to locations with the highest concentration of jobs, affordable housing need and sustainable transport connectivity, to ensure that development helped meet the needs of existing and future communities in a sustainable manner.”*

We in Wantage, Grove and district do not have any concentration of jobs or sustainable transport connectivity which meets the 20 minute zone.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

2

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Option 2: Focus on Oxford-led growth

Much as we support the need to maintain the green belt, Oxford does have all of the sustainable transport connections, rail, bus and cycling and the employment necessary to help to achieve our climate change ambitions. The challenge is how to achieve this without destroying the rich cultural heritage and access to green belt currently enjoyed by its residents.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

3

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Option 3: Focus on opportunities in sustainable transport corridors & at strategic transport hubs

It is impossible to support this Option when so much depends on the possible new national bus strategy and bus services implementation plan and on the possible new national rail strategy.

Whatever these new strategies propose the focus in OX12 is strongly likely to remain on private vehicles to get the majority of residents to places of employment.

We recognise that vehicles will become much more sustainable over the plan period as the switch to electric accelerates but the road capacity is not affected by the type of fuel and the roads around Wantage and Grove are already at or close to capacity and this is unlikely to be heavily influenced by Government priorities in the plan period.

To which part of the consultation does this representation relate?

General Comment

Paragraph

Policy Option

Spatial Option

4

What is the nature of your comment?

Support

Object

Observation

Please provide details of your response as necessary:

Option 4: Focus on strengthening business locations

We support the policy of co-locating housing and economic hubs and believe that this is the only way to provide the necessary growth and achieve carbon neutral ambitions.

However we are concerned by the discrepancies between the “network of business and science parks that covers Oxfordshire and particularly those identified as priority economic assets in the OXLEP LIS key locations within Oxfordshire’s ‘innovation ecosystem’” shown on page 159 and the map on page 161.

Although Grove Technology Park is included on the list, it is too small to provide the levels of employment to support existing housing plans never mind further growth.

On these grounds, we object to this policy.