



Oxfordshire Plan 2050 Consultation March 2019

Need Not Greed Oxfordshire RESPONSE

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together representing thousands of community members. Our campaign is committed to:

- A restoration of planning principles, with a proper balancing of economic, environmental and social considerations;
- Local democracy, with planning control in the hands of locally elected and accountable representatives; and
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.

NNGO is concerned that the proposed plan is predicated on very high and unlikely economic growth, a tangled governance system that overrides local democracy and imposed proposals that will irreversibly damage Oxfordshire's environment. Substantial changes will be needed if the result is to deliver a plan that is genuinely sustainable and which respects social and environmental considerations and capacity, including meeting climate change targets and reversing the decline in biodiversity.

COMMENTS ON THE FOREWORD AND INTRODUCTION

1. Growth must be justified in terms of the benefits it will bring, and how, and not as an end in itself.

In recent years there has been growth in the overall economy, but real incomes and the terms and conditions of employment, have actually worsened for many people. The Plan should make clear how it intends to

improve quality of life of existing and new residents, given the proposed potential doubling of the Oxfordshire population by 2050.

2. How would this Plan, which is predicated on getting large numbers of people to move to here, fit in with plans for other parts of the UK? What are the social equity implications?

Will other parts of the country (maybe less crowded but perhaps more deprived) be disadvantaged by focusing growth in Oxfordshire? What assessment has been made of this possibility and how will any issue of social inequity be addressed?

What is the direct and indirect impact going to be on parts of Oxfordshire that are not focus areas for growth? The document later refers to investment being prioritised in areas of growth, so how will this Plan also ensure social equity across the county, for example so that there is sufficient investment available and allocated to meet and enhance the needs of communities in areas of Oxfordshire that are not direct targets for growth?

3. We think that Sustainability should be embedded more firmly as a core objective in the strategy, with environmental and social sustainability given at least equal status to that of economic growth.

Sustainability is complex, and sustainable growth, which is ostensibly the intention for the Oxfordshire Plan 2050, needs to consider more than just economic growth. Unfortunately, the strategy stubbornly seems to continue to focus principally on economic growth, with social and environmental impacts seen as considerations to be mitigated in the pursuit of this. However, this approach will deliver only short-term gains that will not be sustainable in the long term and will possibly cause net harm in terms of water shortages, air pollution and biodiversity loss which cannot be mitigated.

Planners must take into account the rapidity of current biodiversity loss (70% loss of insects, 98% loss of flood plain meadows, 60% decrease in numbers of all non-human species) and changes to the climate which will force measures to be taken to forestall worse outcomes.

Oxfordshire is being used as an economic honey pot but this exploits the landscape which gives the county its character. There has to be net gain in biodiversity alongside future development. This cannot happen when natural environments are destroyed by road and house building.

4. We are concerned about the complex timetabling of the Oxfordshire 2050 Plan, and its relations to key decisions about the Expressway. We hope this can be clarified quickly.

The Expressway is not a done deal and should not be interpreted as such, especially given the substantial environmental damage and potential social impacts, it will entail. Meanwhile, it seems impossible that a Spatial Plan can be prepared without knowing the possible route. This situation needs urgent resolution.

5. The governance and accountability for the Oxfordshire Plan 2050 needs to be clearer so that existing and future residents and businesses in Oxfordshire can have trust in them. It is hard to have faith in a consultation when the outcomes appear pre-determined.

Who will be making the key decisions?

Whilst this Vision document gives the impression that local residents might get a say, in the midst of consultation we see the publication of the **Joint Declaration of Ambition between Government and Local Partners**¹ which appears to commit Oxfordshire to the Arc-wide growth targets. On what authority did our local leaders sign up to this, apparently predetermining anything that might emerge from this consultation?

The Foreword states that the plan making process will be worked through “collaboratively”, but it is unclear how this is possible when some stakeholders, who are seen as important in the consultation document or other Growth Board documents, are not clearly accountable locally, for example the Oxfordshire Local Enterprise Partnership (OxLEP) and the National Infrastructure Commission. Yet these, the Expressway and other programmes, are directly impacting and influencing the scope, scale and outcome of the Oxfordshire Plan. (We note that the Foreword is not signed by anyone, reinforcing the impression of lack of accountability.)

The role of the districts and their capacity to consider and influence decisions both in the development of this Plan, and then the scope of their influence once it is adopted, is not currently understood (by the public, and also by these councillors) and needs to be transparent.

6. There must be transparency on how the responses to this consultation are to be used and how the next stages of the Plan process are subsequently revisited, improved and refined.

Will there be a report summarising responses and what you will change as a result? It seems likely that some tough decisions will need to be made and someone will need to decide priorities. How will this be done, by whom and what transparency will there be in this process?

¹ <https://www.gov.uk/government/publications/the-oxford-cambridge-arc-government-ambition-and-joint-declaration-between-government-and-local-partners>

- 7. We strongly recommend that as part of the planning process – and in time for the next consultation on scale of growth and broad locations of growth - a publicly accessible interactive map of the whole County is prepared showing the impact of developments in the existing Local Plans (and any other programmes and strategies which are otherwise known about such as the Local Industrial Strategy, Local Transport Plan 4/5 east-west rail, Expressway options etc). It should, at least, show new housing, industrial land, road and other infrastructure developments.**

This would be valuable for communities, stakeholders and elected decision makers to understand the cumulative effects over time of the local plans already in place and agreed to until the mid 2030's. This will facilitate a more informed position for comment on the further growth and impact of the proposed growth strategies up to 2050.

- 8. We think that the requirements of our 'climate emergency' are underplayed throughout the document and should be given much greater prominence.**

We welcome the introduction of a reference to climate change into the Foreword (not included in the draft approved for the consultation by the Growth Board and local councils – see pt 9 below).

Oxfordshire will need to drastically reduce its carbon emissions in the coming decades and requires an ambitious framework to achieve this, especially in the light of growth targets that look set to double Oxfordshire's population by 2050.

Greenhouse gas emissions must be reduced in line with the IPCC recommendations otherwise Oxfordshire will suffer the severe effects of climate change, further biodiversity loss and decline in food production. The new strategic developments in the Local Plans 2031 have already catered for excessive numbers of jobs and houses. Any further increases must be justified. New housing and employment must be zero-carbon.

- 9. We note a number of differences between the consultation document signed off by our local councils and the final publication version. This process requires explanation.**

Whilst Councils were ostensibly given sign-off on the consultation document, they were effectively told that they had to give it the go ahead as there was not time to incorporate changes and go through a further round of approval by all the bodies concerned, ahead of launching it to the public. We are aware of councillors who wished to make changes being told this was not possible.

Nonetheless, we then note that the final publication version is different to the version that was approved by the Councils. Who has made these changes and on what authority? What judgement has been applied to decide whether these constituted major or minor changes?

We should say that we are not necessarily opposed to the changes made (see pt 8 above) but this does raise serious questions about the legitimacy of the process. Overall, we think this is a reflection of the ridiculously tight timescales that the project is working towards and suggest that these should be re-considered as a matter of urgency.

10. We need a commitment to a fully funded and robust green infrastructure strategy and action plan.

A robust and properly funded assessment of green (and blue) infrastructure in Oxfordshire is needed, together with an action plan of how it can be protected and improved. This is critical to the overall credibility of the Plan and any claims that the level of growth proposed can be delivered within our environmental capacity. At the moment, this seems extremely doubtful.

Discussion point 1 – Does the above draft vision meet your aspirations for the future of Oxfordshire? Are there any changes you would like to see to the vision?

We do not agree with the Vision set out in the bubble after paragraph 3 as it is written. There are some important changes and clarification required.

The Vision is a general statement that could apply to anywhere in the UK and ignores the most fundamental issue facing the County which has prompted the Plan – namely the level of future growth that the County should accommodate.

We welcome the introduction of new wording from the draft agreed by LPAs of “well connected”, but “distinct” places to live. However, we strongly favour valuing and conserving the County’s historic character, landscape and rural and natural environment and this is not yet sufficiently reflected in the Vision.

We also think that central government affordable housing policies need to be more evidence based and effective, particularly as they apply in Oxfordshire. We agree that housing should be secure and good quality within reach of all, well designed for healthy lifestyles and sustainable travel. But we are

concerned that central government policies will need to change to allow this and thus question the capacity of the Growth Board and this Plan to deliver this. For example, central government intervention is needed to keep the existing stock of social housing available and to enable more to be built by local authorities (as recently promised). The government should avoid funding policies that, although they claim to make housing more affordable, have the effect of increasing prices and profits for developers. A notable example is 'Help to Buy'. We note the recent National Audit Office² report which raises concerns about building new homes and providing affordable property. Their summary of the planning system for new homes (Para 24) is that 'it is clear that the system is not working well'.

We also think that '*resilient to climate change*' is too weak given the likely scale of the challenges faced. For example, this could be simply interpreted that housing will be flood resistant. This does not reflect the commitment in Topic Paper 9 which notes the objective to: '*Lead nationally and internationally to reduce countywide emissions by 50% by 2030, on 2008 levels, and set a pathway to achieve zero carbon growth by 2050.*'

Instead, therefore, we would suggest the following wording for the Vision:

In 2050 the people of Oxfordshire are living in sustainable communities with a high quality of life and strong sense of community. The integrity and richness of the county's historic **and rural** character, **landscape** and natural environment are valued and conserved. **The intense pressures for development to which Oxfordshire has been subject have been carefully controlled and restrained in order to ensure that social, environmental and economic factors have been balanced in a sustainable way. Growth in population has, at a maximum, reflected the overall growth rate of the UK population. Excessive and damaging growth has been avoided and the county's highly regarded historic and rural aspects are respected and preserved.** A wide range of secure and good quality housing options are within reach for all, **with local decision makers working proactively with Central Government to identify planning strategies and policies that deliver truly affordable homes.** Existing and new communities are well connected integrated, distinct, attractive and desirable places to live; their design and layouts facilitate healthy lifestyles and sustainable travel options. **Levels of productivity are optimised within the carrying capacity of the County in terms of social and environmental sustainability,** and residents are well-skilled and/or able to access a wide range of **high-value** job opportunities **for all abilities such that all our communities can** share in

² National Audit Office, Planning for new homes, HC 1923 SESSION 2017–2019 08 FEBRUARY 2019. <https://www.nao.org.uk/report/planning-for-new-homes/>

wealth creation. The private and public sector continue to have the confidence to invest in the county **but further advances in high speed electronic communication have meant that many economic activities originating from Oxfordshire, especially in the knowledge based sectors, have been able to be physically located in less pressured parts of the country, delivering UK wide social equity while still retaining strong links and opportunity with the County.** Oxfordshire **will have** embraced the technological, demographic and lifestyle changes of recent decades and new developments are fit for the future, **not only being resilient to climate change in their design but also delivering a net zero-carbon economy and society in Oxfordshire as soon as possible but no later than 2050.** The wellbeing of residents and workers is enhanced through being part of this special place.

The Oxfordshire Context – some comments

Quality of life context

We note the comparatively high levels of satisfaction with life locally, although there are acknowledged pockets of deprivation. However, there is little information provided as to how specifically the proposed growth is expected to address these, particularly with much of the growth strategy focussed on knowledge-based, and high value employment opportunities. Social equity issues, developing opportunities and a strategy for sustainable communities in more rural locations or for the lower skilled and waged, or for people with disabilities, are currently not sufficiently addressed.

Economic context

We are concerned that although Oxfordshire has a strong economy compared to other areas, an unelected and unaccountable LEP sets the Local Industrial Strategy.

The coupling of economic growth and more housing (beyond that already planned for) is being stated as fact but without convincing evidence of the need for this coupling or how one is reliant on the other. A 'global innovation ecosystem' does not imply in itself a need for more housing.

If there are high levels of economic activity in Oxfordshire already, shouldn't investment and growth be directed to areas of the UK with fewer employment opportunities?

Within the county, the Oxford-centric nature of this document is concerning.

Rural parts of the county, their communities and the rural economy, are not adequately respected, recognised nor protected in the current proposed documentation.

The document suggests how the evidence bases will be assessed and "balanced" against each other. Heritage assets, ecosystem services and the landscape, and the employment related to maintaining their quality, must not be marginalised and should instead be included in the economic calculations with equal weight and recognition as the other listed employment sectors.

Natural and built environment context

The document notes the value of the historic built, managed and natural landscape, to the attractiveness of the county for investment, residency and visitors. And the protected status of some of these is recognised. Yet – even with these protections - we won't be able to conserve or preserve, let alone enhance, Oxfordshire's environment, landscape and townscape features if an unrestrained building programme is put in place for the next 31 years which ignores their importance or which is used to tilt the balance in planning decisions.

The 25 Year Environment Plan is not adequately referenced nor embedded in the Oxfordshire Plan 2050 strategy and project structure. **This is a serious omission.** The Glover Review of protected landscapes, just one part of this, will potentially have significant impact on the Oxfordshire Plan considerations.

Changes in the policy environment for agriculture, air pollution, soil erosion, biodiversity, water & sewage management, all need to be factored in..

Ecosystem services are also highlighted for their essential role in human health and wellbeing, and indeed to support all human activity. Yet impacts on the environment in this document focus on mitigating adverse effect, not looking to protect and enhance it as a valuable, long term resource.

We agree with the document which notes that 'many of our environmental assets

'have 'been declining over the course of decades, with major challenges including climate change, air and water pollution, land contamination, fragmentation of habitats and a decline in biodiversity'.

We should be reversing these changes. The enormous scale of development planned for Oxfordshire – and the capacity in the Plan for local voice and

accountability - will make this challenging if not almost impossible. You simply cannot build over swathes of Oxfordshire and enhance the environment.

At what point will the sustainable limits of natural systems be recognised and used to set the upper limits of the scale and scope of the Oxfordshire Plan and other strategies (eg Local Industrial Strategy)?

Again, the influence and consideration of the 25 year environment plan is not recognised sufficiently in the proposals. This needs to be included in the balance, especially when other strategies such as the OxCam Arc will also be influencing the officers and councillors making the “difficult decisions” that will be required. It is also a concern that there is insufficient scientific skills base and understanding of environmental sustainability issues to ensure that the right weighting is given in these decisions and we would urge – as DEFRA did to the Growth Board – that personnel with specific skills and remit for sustainability are embedded in the structure.

The Oxford-centric nature of the document noted in the previous section continues here and adds further concern that rural needs are not only not understood, but are not being given appropriate consideration.

We also note the recent concerns about building environmentally sustainable housing³ and hope that high standards will be required in Oxfordshire.

Housing context

You can't claim that building more new houses (which will be expensive considering land prices) will sort out affordability problems. More radical and national approaches will be needed to sort out this issue.

Housing costs are high and not affordable for many. High prices can encourage people to commute longer distances from more affordable areas.

But we don't think that building lots of expensive new houses will sort out the problems of affordability. The draft analysis of the Letwin review⁴ says that land zoned for building is valued based on the price of surrounding houses. Builders buy at that price and don't build so fast that the prices they can sell at

³ UK Housing: Fit for the Future?

<https://www.theccc.org.uk/2019/02/21/uk-homes-unfit-for-the-challenges-of-climate-change-ccc-says/>

⁴ Independent Review of Build Out Rates, Draft Analysis, Rt Hon Oliver Letwin MP, June 2018.

<https://www.gov.uk/government/publications/independent-review-of-build-out-draft-analysis>

fall below that level. If they did, they would make a loss. The earlier Barker review⁵ makes the same point:

'Many housebuilders "trickle-out" houses, controlling production rates to protect themselves against price volatility and any adverse influence on prices in the local housing market, particularly when the development is large.'

So, builders will understandably delay housebuilding, rather than make a loss. Zoning very large areas of land for new houses is not likely to reduce local house prices.

It is also reasonable to assume that some of the build in Oxfordshire could be seen as attractive, and more affordable, than living in London, increasing commuting from that city and not meeting local needs. The focus on highly skilled/knowledge based job creation also implies housing development that does not address existing need for the poorer in our communities. Reusing existing stock, re-evaluating housing densities, types and tenures and looking at social housing opportunities would be welcome alternative options.

We note the publication of the **Joint Declaration of Ambition between Government and Local Partners** which appears to commit Oxfordshire to the Arc-wide growth targets, but consider that this document is deeply flawed and has no validity until endorsed by proper and robust public consultation and examination.

⁵ Review of Housing Supply, Securing our Future Housing Needs, Interim Report – Analysis, Kate Barker, December 2003. Paragraph 30.

Discussion point 2 – Do you feel that we’ve identified the right aspirations for Oxfordshire? Where do you think the balance should lie in prioritising these aspirations?

We do not agree that the plan has the right five aspirations for Oxfordshire.

Our rationale is as follows: the only two meaningful aspirations are those of environmental sustainability, and for social equity and sustainability. These reflect the needs of our communities and our reliance upon, and stewardship of, our environment for future generations.

These TWO Aspirations can be delivered through various mechanisms including improving housing availability and affordability, economic growth, and improving connectivity and movement. But these are delivery mechanisms and should not be aspirations in their own right.

We also suggest that two more Objectives are added. These cover Climate Change and Traffic on major congested routes.

We have a number of comments on the Aspirations and many on their linked Draft Objectives. We present these in our response to the next Discussion point.

Rank now	Aspiration	Proposed rank	Draft Objective numbers	Extra Objectives
1	Protecting environmental quality	1	1,2	+1
2	Strong and healthy communities	2	3,4	
3	Support Economic growth	Not an Aspiration	5,6	
4	Improve housing availability & affordability	Not an Aspiration	7,8	
5	Improve connectivity and movement	Not an Aspiration	9,10	+1

Thus - compared to the table in the Plan document, we agree that Protecting environmental quality and communities should be the priority and stated aspirations.

Economic growth, housing and connectivity are delivery mechanism, and could have specific SMART objectives and be designed to deliver a plan that

optimises for social and environmental goals. But they are not Aspirations and therefore should appear last in this list if at all.

Please review and improve your governance arrangements to agree the plan. At best they are confusing, at worst a deliberate smoke screen for developers. The role of the districts and their need to understand and consider decisions needs to be clearer.

Paragraph 35 in the introductory section says that '*we can decide where the appropriate balances may lie*'. We note that you have removed the word "together" from this statement from the draft that was approved by Local Councils. Again, the issue of balance between competing needs and priorities is key, as is the manner in which this will be determined. The removal of "together" from this statement means that even greater transparency must be demonstrated on how the decision will be made on "*where the appropriate balances may lie*" Otherwise, the assumption could easily be that decisions are being imposed on us by the anonymous, unaccountable governance mishmash of Districts, County, Growth Board, National Infrastructure Commission, the LEP, the 'Independent business chair' of the Arc and the 'Ministerial champion for the Arc'.

Discussion point 3 – Do you feel the draft objectives are appropriate for the plan? Are there any changes or other objectives that you would like to see? Should they be bolder? Or more specific?

Aspiration 1 – Protect environmental quality

We agree that this should be ‘Aspiration 1’, as without an effective, well managed and stable natural environment, we will have serious existential difficulties. We note the change in its position from Aspiration 4 in the draft approved by LPAs.

We do however suggest an amendment to the title for this Aspiration. It is at first sight difficult to disagree with ‘Protect Environmental Quality’. But what does it mean? Does it mean maintain existing quality even when this is low, as in the case of air quality in some locations, or current poor land management practices, or carbon emissions? This does nothing to deliver our national and international commitments, such as those for climate or within the 25 year Environment Plan.

Instead, therefore **Protect and Improve Environmental Quality** would be more appropriate, underpinned by objectives with associated SMART targets and priorities

We also have concerns about the text discussion in the document about this, and the other draft objective for the environment. Both focus on choices being about *where* the development should be, and how to mitigate the impacts. The choice is not about the environmental (and heritage) assets of the county being fundamental to the choices being made in terms of scale, or if indeed we do it at all in light of the damage it would do. The complexity, capacity and resilience of natural (and social) systems needs to be understood and put at the forefront of decision making.

Draft Objective 1 – We suggest a change in wording to this objective such that it reads: To maintain and enhance the **ecosystem services, social and cultural capital and legacy, and the** historic built and natural environment of the county ~~through strategic investment and high-quality design~~ and to capitalise on **recognise** the benefits these assets contribute to quality of life and economic success **as well as their intrinsic value, capacity and resilience such that they can be appropriately protected and can be enjoyed and relied upon by future generations.**

Ecosystem services have intrinsic value and both protecting and enhancing them will give benefits in perpetuity and hence should be included specifically in the objective. There can be no habitability without conserving and enhancing the land that provides the ‘ecosystem’ services.

Heritage is not just about physical assets, but also about social and cultural traditions.

There must be flexibility and capacity built into the Plan to accommodate long term or chaotic environmental changes arising from climate change, and other political, economic or statutory commitments that could affect the landscape and agriculture, such as those arising from Brexit and/or from the 25 Year Environment Plan.

Draft Objective 2 – Also requires some changes, such that it reads: To protect and enhance the County’s distinctive landscape character, recreational, **ecosystem** and biodiversity value by ~~considering the benefits~~ **prioritising the protection of** these assets ~~bring when~~ **defining the overall scale as well as choice of selecting** areas for growth, by optimising densities, by improving connectivity between environmental assets and securing net gain for biodiversity

If the Oxfordshire physical environment becomes too damaged, the attraction of the area will fade, removing one of the key resources and features for investment on which the Plan is based. Accelerating biodiversity loss is a severe threat to survival of our food production. Loss due to over-development is on the cards with this plan.

There is also a worrying focus in the discussion in the document that merits further comment. It should not be assumed that only sites or landscapes with designation need protecting, or connecting. A hierarchy is practical and has some value in decision making but the implication that only those with protected status are specifically being considered, with the value of ecosystem services and intrinsic value of nature and the environment outside of these protected areas as not integral to decision making, is concerning.

There should be another Draft Objective, to mention the goal of zero carbon emission by 2050, as follows:

Draft Objective XX – To lead nationally and internationally in reducing countywide emissions by 50% by 2030, on 2008 levels, and find ways to achieve a zero-carbon economy and society as soon as possible but no later than 2050.

This is based on Topic Paper 9 which notes the objective to:

‘Lead nationally and internationally to reduce countywide emissions by 50% by 2030, on 2008 levels, and set a pathway to achieve zero carbon growth by 2050.’

Merely looking to mitigate environmental damage (notably climate change) from development or other activity is not responsible and does not give a sustainable Plan. A more proactive approach is needed, whereby the environment and climate change considerations are used as appropriate both to define, and constrain, strategies and growth programmes such as this Oxfordshire Plan 2050.

Aspiration 2 – Strong and healthy communities

This is appropriate as ‘Aspiration 2’. It should also be recognised however that, whilst spatial planning has a role in providing a healthy environment, infrastructure, services and other actors, notably education services and the NHS also have significant influence. Thus the Plan needs to ensure that sufficient and timely investment and provision is made for GP surgeries, hospitals, schools, recreational facilities etc.

We agree with paragraph 43 which says that a range of housing options is needed to suit different parts of the community. Providing for a range of clear needs should be the objective and that may help define the total need figure. This is picked up in Objective 8. However, it is concerning that the rest of the document assumes growth in general and the delivery of additional housing, yet the call for views on the scale of housing needed is supposedly later in the year in a separate consultation exercise.

Also, we agree that the benefits of economic growth should be shared widely throughout the community rather than being focused on particular sectors or parts of the county. Social equity, between generations and between urban and rural must be specifically assessed and provided for in investment planning, growth and opportunities.

Draft Objective 3 should be rephrased– To improve health and wellbeing by enabling independence, encouraging healthy lifestyles, facilitating social interaction and creating inclusive and safe communities **that provide good health, education and recreational facilities.**

Draft Objective 4 is welcome and reflects the necessity to revisit the Oxford/OxCam Arc centric nature of the Plan and consider the long-term needs for all communities, including rural ones that are not central to the growth programmes and strategies that are heavily influencing the direction of this Plan.

It is notable that a number of additions to this section were made to the consultation document that were not present in the draft agreed by LPAs. Having said that, these were welcome additions with one on climate change (which should have perhaps sat

in the environment section) and three significant additions on healthy place shaping, the latter clearly showing the benefits and importance for having officers with remit for an issue such as this and personnel with specific skills embedded in the project structure. Again, we call for the same to be done for the highly complex, and technical, issue of sustainability, and especially environmental sustainability.

Aspiration 3 – Support economic growth

We think this should not be an Aspiration. It is a delivery mechanism and thus should simply sit as a set of objectives underpinning social equity and environmental aspirations for the county.

Para 46 notes that it is desirable for future generations to have access to high value, quality jobs. We agree, but what about the provision of opportunities for people in our society who are unable to do highly skilled or knowledge based work?

Also, inequality may not necessarily be reduced by 'Maximising the creation of wealth in the county' (Para 46). Growth is not always 'a positive... for everyone' (Foreword) and certainly not for Oxfordshire's green infrastructure.

Para 47 brings to question as to who the Plan is actually for, Oxfordshire or the UK? Sustainable economic growth is again mentioned without reference to any social and environmental parameters. Is the plan beneficial for Oxfordshire residents or rather for company shareholders who may live elsewhere in the country and even outside the UK?

Para 48 notes the negative effects of 'out of town' development on town centres. This clearly illustrates the problems of forecasting. A similar subsequent and relatively unanticipated change in retailing has been the move away from 'big-box' out of town superstores to smaller local shops, under the same basic brand. For example, the emergence of Tesco Express small in-town stores. Now we have online retailing and extensive delivery services for grocery and any other goods. What will be next?

Para 49 is potentially misleading. It says that Oxfordshire will determine housing numbers and appropriate level of economic growth. This is ambiguous and could equally refer – for example - to the LEP, which is unelected, as determining these rather than Oxfordshire's communities and elected councillors.

To illustrate: we note that the Local Industrial Strategy (LIS) sets out a target of 108,000 net new jobs by 2040 and that this is being agreed by Government behind the scenes without being subject to public consultation. We think that it is instead for the Oxfordshire Plan 2050 to establish the correct targets, in a democratic and transparent manner. There needs to be clarity about the weight that will be given to the influence of the Expressway and LIS and other strategies in any balance with

local, Oxfordshire community and elected member voice. Unfortunately, the track record based on the SHMA that imposed very rapid growth across the County in the Local Plans, is not a good one.

Draft Objective 5 – should be rephrased – To establish the right conditions to sustain and strengthen the role of Oxfordshire in the UK economy by building on our key strengths and assets **but without compromise to social equity, our landscape, the capacity and resilience of our ecosystem services and natural resources, local decisions about our capacity and the scale of growth, and with regard to economic growth in Oxfordshire not being to the detriment of other areas of the UK.**

The Local Industrial Strategy (Para 10, 45, 47) is produced by the LEP, which is not an elected body and so it is not accountable. The Local Industrial Strategy is being agreed by Government behind the scenes but is not subject to public consultation. The influence of this strategy on the final outcome of the Oxfordshire Plan 2050 should be considered in this context and with caution.

Draft Objective 6 should be rephrased – To create a ~~prosperous~~, successful **resilient and sustainable** and ~~enterprising~~ economy with benefits felt by all **across the county and which is sustainable in the longer term and has taken into account, and is constrained by, the capacity of social and natural assets in the county and other parts of the UK.**

Aspiration 4 – Improve housing availability and affordability

We do not think this should be an Aspiration. It is a delivery mechanism and thus should simply sit as a set of objectives underpinning social equity and environmental aspirations for the county.

Para 51 is not coherent. This aspiration is supposedly about providing more housing that is genuinely more affordable. The paragraph suggests such housing is needed for those who have family ties or employment for example, which is very reasonable. It continues, however, to suggest that the housing would also be required for people who “*recognise what a special place Oxfordshire is*”. This is not a reasonable argument and should not be a stated or recognised justification for housing growth.

Para 52 proposes that additional housing beyond the 100,000 proposed in existing and emerging Local Plans would be required to be provided to deliver the affordable housing required in the county. However, this is making two erroneous assumptions.

One is that more housing will drive house prices down, which is not necessarily the case. And the other is that innovative solutions within the existing Plans are not sufficient to address the availability and affordability needs within themselves.

It is clearly difficult to estimate what local needs will be after 2031. The latest figures released by the government on household population projections⁶ suggest an increase for the whole of Oxfordshire of 37,000 for 2019-2041. Given the 100,000 houses proposed in the Local Plans already, what justification can the 2050 plan have for yet further housing? The only explanation both for this and, indeed, for 100,000 houses by 2031 is to accommodate large scale migration from other parts of GB, and particularly from London.

Even the 100,000 committed to through Local Plans is categorically a higher rate of growth than historically and a significant increase over projected needs and could indeed conceivably be sufficient to 2050. We again repeat our question as to what justification is there for this escalated growth based on migration into the county in terms of *benefit to Oxfordshire's communities*? And what flexibility can be introduced into the Oxfordshire Plan such that the commitments even to the 100,000 being ostensibly delivered in Local Plans until 2031 can be reviewed as needs change and more information arises? We also repeat here our concerns about equity on a wider scale, from the social and economic impacts on neighbouring and wider areas in the UK from this concentrated growth in, and migration to, Oxfordshire.

So, we suggest that - in both Draft Objectives 7 and 8 - the Plan needs to be guarded and flexible about what local needs will be emerging between now and 2050. It should not commit to any further large-scale growth and should be prepared to revisit existing target commitments in light of emerging evidence and needs (locally and nationally). It should be flexible and should seek to phase existing proposals over a much longer period.

Draft Objective 7 should be amended comprehensively, to say – To meet Oxfordshire's identified housing needs, particularly social housing. Given the length of the plan period and the scale of change proposed, land releases should be flexible and phased in as needed, and not all released at the start of the plan. As evidence of need emerges, more land for housing can be released as necessary.

Draft Objective 8 to be rephrased as – To ensure that an appropriate range of housing options are available, as monitoring of needs before and during the plan period prove they are necessary, that will cater for the specific identified types of needs and are built for adaptability, energy efficiency and to a high quality.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

Aspiration 5 – Improve connectivity and movement

We think this should not be an Aspiration. It is a delivery mechanism and thus should simply sit as a set of objectives underpinning social equity and environmental aspirations for the county.

There is an acknowledged need to sort out Oxfordshire’s existing critical transport problems. This would provide better foundations for any economic growth that is identified as needed and is planned.

Clearly the need to reduce the need for travel and to facilitate necessary travel, will be important principles throughout the Plan period, albeit the modes of transport and transport patterns may change significantly over time. Much more will need to be spent to improve the attraction and viability of walking and cycling. Prioritising strategies and investments that provide opportunities for flexibility as travel needs evolve in time would be prudent.

Joined-up thinking by combining the Local Transport Plan and Oxfordshire Plan 2050 strategies would also seem logical and essential.

Para 51 suggests that “*significant new pieces of infrastructure is only usually realistic where new development is delivered.*” This is concerning for those parts of the county that are not a focus for growth. What consideration will be given to ensure that these areas will not become deprived of investment and will have their own sustainability needs addressed by the Plan. It seems likely that rural areas or communities in landscapes or settlements with protected status may be particularly vulnerable in this regard.

Draft Objective 9 – To reduce the need to travel and provide better travel choices, ensuring that walking and cycling are convenient and attractive, and that public transport is preferred by residents to private car ownership and use

Draft Objective 9 needs to consider wider transport issues, notably through traffic and the issues raised by the Expressway and the new rail link to Cambridge. So, an additional Draft Objective is proposed, see below.

Draft Objective YY – To respond appropriately and at a local scale to existing problems of congestion and air pollution due to traffic moving within and through Oxfordshire on major congested routes, notably but not exclusively the A34, the A40 and other sections of the Oxford ring road.

Draft Objective 10 – To promote development in the most sustainable locations and co-locating homes and jobs; then connecting those less sustainable locations through improved public transport and digital networks

Draft Objective 10 is logical, but raises questions about what the role of 'less sustainable' rural areas will be.

Broadband connectivity is evidently going to be a key and required feature in future developments. Technology is extremely difficult to forecast. We only have to consider the view from the year 2000 to see what forecasts made then missed out – the rise of Google, Amazon, Social media, Apps, extremely versatile Mobile phones, the beginnings of Artificial intelligence and so forth. So, it is difficult now to predict what new technology or other social needs we will have in 31 years' time in 2050.

Discussion point 4: Do you agree with the commentary relating to the spatial scenarios illustrated, or do you think there are important considerations we have missed? Do you consider there are any other potential spatial scenarios we should consider? Are there any spatial scenarios you think we should avoid (please provide reasons if you can)?

Comments on the eight broad spatial forms of developments follows:

1. Intensification of city, town and district centres

This is reasonable. Brownfield land or buildings that become redundant for whatever reason should be considered for redevelopment. It should be noted that brownfield land is not a finite resource, with new sites often becoming available over time. This may well be particularly true over coming years given the current changes in retail patterns.

2. New settlements

New settlements, carefully placed and with timely and comprehensive infrastructure investments, can potentially be more sustainable in terms of social cohesion and environmental impact.

The choice of location however is problematic. The infrastructure costs of setting up a new settlement on green fields is considerable. Many possible sites are in rural areas, which tend to have very poor infrastructure of all kinds. A whole range of services has to be provided. Some services tend to be forgotten, for example provision of GP surgeries. Widespread rural development could lead to significant loss of agricultural land which is currently used for food production or has other value, as defining the setting of historic or landscape assets, for tourism, or simply its intrinsic ecological value.

We already have a couple of examples of potential new settlements with possible complications. One proposal is to build at Chalgrove airfield – which would eject an internationally known business and would require significant improvements to miles of roads that are rural in nature and low in capacity. Another example is the ‘Oxfordshire Cotswolds Garden Village’ North of Eynsham. This will feed more traffic onto the already hopelessly busy A40.

3. Dispersal spreading evenly across the county including into smaller settlements

A possibility, but it would impose a requirement on many settlements across the County. Presumably the requirement would be proportional to population for example. This would not be difficult in some areas, but it would be a problem for other settlements, especially those with historic or protected status. Some settlements would also struggle with infrastructure issues and social cohesion.

4. Wheel settlement cluster

This is focused on Oxford, but also joining up nearby larger towns. It implies that connections between the settlements outside Oxford will be improved, which might take the pressure off corridors into Oxford. So, links from Witney across country to Banbury might be improved, or from Abingdon to Didcot say... As such this has some potential benefits, but the infrastructure costs could be considerable – as the distances involved could be large. Also, funding seems uncertain. It would work best if individual communities could agree to this approach, as in the ‘String settlement’ approach.

5. Intensification of development within existing suburbs

This can be disruptive, but some intensification is reasonable where sites have existing low-density or redundant uses.

6. Intensification around the edges of larger settlements and strategic extensions

There will be more opposition to the continuing use of the magic key words ‘exceptional circumstances’ to justify Green Belt incursions – when these have in fact been imposed by supposedly local decisions to accept very high future growth rates. Wellbeing, ecosystem services, historic settings and landscape assets will, by 2031, be affected adversely.

7. Spoke and hub, continue to focus on Oxford and Key corridors in to Oxford

As the notes say, existing routes into Oxford are already at high capacity. Hours of traffic chaos results from events such as a single HGV crashing on the A34. Existing infrastructure would have to be improved significantly and on all major roads into the city. This would be very expensive and inevitably damaging to the existing environment, requiring demolition of some property. It is difficult to imagine that the large amounts of funding that would be needed will be available.

8. String settlement clusters – focused on linked settlements - could be new or expanded existing settlements

This seems to be the 'Expressway' option! It depends on how the route of that is chosen. Is there a preference to plough across open countryside – which opens up this option and the new settlement option? Or join up the dots between existing settlements that have been asked and are content to be connected? Or will the Expressway closely follow existing roads – notably the A34 North of Oxford – which limits this option?

We note that considering the spatial form of development is difficult given that we do not know the amount of growth planned. If that was clearly just to meet local needs and lower levels of growth, which is our view, then less dramatic/gradual growth options could be considered. This is hinted at in paragraph 57.

Overall, we think that a range of approaches would be needed, sensitive to local conditions, infrastructure issues and opportunities. We are less attracted to Options 2 and 6, the suggestion of new settlements (where could these be?) and further incursion into the Green Belt or AONBs – as we consider that this option has been exhausted by the current plans.

Discussion point 5 – Do you agree with the commentary relating to the main infrastructure issues? Are there any changes or other issues that you would like to see referred to?

The section on Key Regional Projects mentions E-W rail, the Expressway, and the 'SE Strategic reservoir' near Marcham. These are key decisions that will be imposed on the county. The E-W rail link is a good suggestion and is approaching completion. But the other two raise great concerns about their impact and the scale of growth planned, as we have mentioned. We believe it is important to measure the effectiveness of opening up the east-west rail link first before further development is decided.

Much of our transport infrastructure is to support national traffic 'passing through', and this needs to be more explicit in the Plan, alongside a strategy for the future and the anticipated changes over time with this.

The text worryingly points out that even the funding for infrastructure projects needed to support the 100,000 houses that we have rashly planned to build by 2031 is not available yet, (Paragraph 66 – 'However, there is still a funding gap and deliverability issues...'). This reinforces the statement made in the 2017 Infrastructure Strategy that "Growth in Oxfordshire in recent decades has created a deficit in existing infrastructure" (OxIS 2017, p6). How can there be any confidence that more development will not serve to exacerbate this deficit, which already runs into over £8bn?

Our concerns are compounded by the recent report by the National Audit Office⁷. This highlights many of the issues that we raise, notably that:

- Local authorities are held to account for providing new homes but this is not fully within local authorities control as they are not major housebuilders (Summary, Para 11). So, it is estimated that 50% of authorities are at risk of failing the new housing delivery test;
- *'Contributions to the cost of infrastructure and affordable housing agreed with developers are not keeping pace with increases in house prices. The Department estimates that average contributions agreed with developers remained in cash terms at around £19,000 per new home permissioned between 2011-12 and 2016-17. In contrast, over the same period, average house prices increased in cash terms by 31% and the top five developers' average operating profit margins*

⁷ Planning for New Homes <https://www.nao.org.uk/report/planning-for-new-homes/>

increased from around 12% to 21% between 2012 and 2016.' (Summary, Para 20); and

- Between 2010-11 and 2017-18, there was a 37.9% real-terms fall in net current expenditure (expenditure funded by an authority's own resources) on planning functions (Summary, Para 21). And research in 2017 indicated that the number of local authority planning staff fell 15% overall between 2006 and 2016 (Summary, Para 22).

So, we are concerned that promising to deliver vast numbers of new houses, far more than are needed by local people, could set Oxfordshire up to fail the Housing Delivery Test for years to come.

We are very concerned about the infrastructure funding gaps, which appear despite or perhaps because of the increasing profits made by developers.

Further, infrastructure **must** be in place in a timely manner, in order to support housing delivery. **The significant shortfall between the billions of pounds needed** for infrastructure for the 100,000 houses to 2031, and the £215million provided in the Growth Deal is deeply concerning.

And finally, we wonder if the Councils have enough resources and planning staff to properly produce the Oxfordshire Plan 2050.

Where has green infrastructure gone?

A robust and properly funded assessment of green (and blue) infrastructure in Oxfordshire is needed, together with an action plan of how it can be protected and improved. This is critical to the overall credibility of the Plan and any claims that the level of growth proposed can be delivered within our environmental capacity. At the moment, this seems extremely doubtful.

Submitted on behalf of the Need not Greed Oxfordshire coalition

Planning for Real **NEED** not Speculator **GREED** in Oxfordshire

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