

Oxfordshire 2050 Plan – Regulation 18 Stage 2 Consultation

RESPONSE OF THE OXFORD CIVIC SOCIETY

Contents

1.	Introduction.....	2
2.	Plan Section 1.2 - What is a Joint Plan?	2
3.	Plan Section 1.3 - What is the Oxfordshire Plan?	2
3.1.	Selection of the most appropriate type of Joint Plan	2
3.2.	The Oxfordshire 2050 Plan’s relationship with Local Plans and associated plans and strategies.....	3
3.3.	The political resilience of the Oxfordshire 2050 Plan	3
4.	Plan Section 1.4 - What is the Oxfordshire Plan seeking to achieve	4
5.	Plan Section 1.5 Relationship with other plans and strategies and the public.....	4
5.1.	Relationship with the public	4
5.2.	Relationship with the Local Transport and Connectivity Plan	5
5.3.	Relationship with Oxford Infrastructure Strategy.....	5
5.4.	Relationship with the Arc.....	6
5.5.	Plan Section 2.1 - Themes and policies in general	7
6.	Plan Section 2.2 - Theme One – addressing climate change	7
7.	THEME TWO – Improving Environmental Quality	8
7.1.	POLICY OPTION 8 - Biodiversity Net Gain.....	8
7.2.	POLICY OPTION 10 – Green Belt enhancement	8
8.	THEME 4 – Planning for Sustainable Travel and Connectivity	9
8.1.	POLICY OPTION 21: Strategic Infrastructure Priorities.....	9
9.	THEME FIVE – CREATING JOBS AND PROVIDING HOMES.....	10
9.1.	POLICY OPTION 22 – Supporting the creation of Jobs	10
9.2.	POLICY OPTION 28 – HOMES – HOW MANY? COMMITMENTS AND LOCATIONS. HOW MANY HOMES?.....	10
9.3.	POLICY OPTION 30 - AFFORDABLE HOUSING	11
10.	SPATIAL STRATEGY OPTIONS.....	11

1. Introduction

1. **We welcome the strong collaborative spirit at the heart of the Future Oxfordshire Partnership (formerly Oxfordshire Growth Board):** a joint committee of the six local authorities, together with key strategic partners - including Oxfordshire's two universities and the LEP. **We also welcome the good intentions of the proposed Oxfordshire 2050 Plan. But we are not convinced that the Plan is sound in a number of respects. Our comments are on selected sections of the consultation document, as follows:**

2. Plan Section 1.2 - What is a Joint Plan?

2. Joint strategic plans (JSPs) are high level vision-led strategic (place-based) frameworks being prepared within the context of a statutory development plan (allowed under Section 28 of the 2004 Planning and Compulsory Purchase Act). JSPs usually cover large spatial geographies and involve a number of local planning authorities e.g., the Oxfordshire Plan is countywide with 5 local planning authorities and the South Essex JSP covers 6 local planning authorities. Voluntary governance structures underpin the joint plans – although there is provision in the 2004 Act for statutory joint decision-making (Section 29), all current rounds of JSPs are being managed through voluntary collaboration with decision-making staying with the individual LPAs (i.e., county councils are involved but have no decision-making rights).

3. The JSPs (or aligned strategies) set the spatial framework for the area but not site allocations, although they can allocate strategically important sites and can propose a redistribution of growth/housing across the areas to support the long-term vision.

4. There have been major challenges in terms of how these arrangements fit with the current local plan system as well as challenges in relation to the relative weakness of voluntary governance arrangements. Some of these challenges are noted in our comments on the draft Plan, below.

5. Earlier attempts at preparing a Joint Strategic Plan (West of England) (i.e., of the form being produced in Oxfordshire) failed at the Public Examination stage. **It would be helpful if the document identified the lessons learnt from the experience to ensure that the Oxfordshire Plan has a reasonable chance of success at Public Examination stage.**

6. There is, perhaps, a role for a strategic planning advisory body charged with integrating planning for the key sectors and advising local and central government on how local growth priorities could support national objectives. This more cohesive approach could attract government and private sector resources as well as building local capacity.

3. Plan Section 1.3 - What is the Oxfordshire Plan?

3.1. Selection of the most appropriate type of Joint Plan

7. This is not the only form of joint plan being developed in England and whilst not challenging the selection of this form, the Oxford Civic Society would welcome an explanation of why this particular form was chosen.

8. In particular the Oxford Civic Society considers that **a continuing joint strategic planning process is required in Oxfordshire, rather than production of a singular plan for a specific period.** It is recognised throughout the draft Plan consultation document that the context of the Plan is changing constantly and is expected to continue to change throughout the Plan implementation period. **This encourages the recommendation that a continuous strategic planning process is required with associated governance arrangements including joint staffing or at least that the Oxfordshire 2050**

Plan is reviewed every 5 years, as is the case with Local Plans. In this case of course, the Oxfordshire 2050 Plan review should precede Local Plan reviews to ensure that the strategic spatial plan provides the framework for the Local Plans and not the other way round.

3.2. The Oxfordshire 2050 Plan's relationship with Local Plans and associated plans and strategies

9. It is noted that the Oxfordshire 2050 consultation document states that the Plan will only contain policies that are appropriate to its overarching role as part of Oxfordshire's portfolio approach to plan-making and strategy development. It will not, for example, include policies that are more appropriately made in local or neighbourhood plans. The Oxford Civic Society agrees with this view of the relationship between the Plan and local plans.

10. However, the City and District councils in Oxfordshire each have their own adopted local plans, with plan periods up to 2031 in most cases, and 2035 (South Oxfordshire District Council) and 2036 (Oxford City Council, with a review already started to extend this to 2040)¹. **The growth² in these existing adopted local plans is committed, presumably meaning that the influence of the Oxfordshire Plan will be minor for much of the plan period to 2050.**

11. **This implies a conservative approach to growth projections since once an allocation has been adopted in a Local Plan it cannot normally be rescinded should circumstances change. On the other hand, if growth trends happen to prove greater than initially planned, Local Plan reviews in the mid/late 2020s for example could add to allocations needed a decade later³.**

12. **The Oxfordshire 2050 Plan could have an important role to play in setting Oxfordshire on the pathway to deliver transformational change but it could be constrained by having to work through commitments in the existing adopted local plans for crucial years of its planned implementation period. This will be a significant constraint if the current growth distribution policies of the district and city councils are not consistent with the objectives and hoped-for outcomes of the Oxfordshire 2050 Plan. It would be helpful for the Oxfordshire 2050 team to not only make a clear assessment of how significant this problem is, but also to provide the legal and democratic options for reviewing and updating the Oxfordshire 2050 Plan and the adopted Local Plans.**

13. **Similarly, the complementarity of the policies of associated plans (for example, the Local Industrial Strategy, strategic transport plans, Oxfordshire Infrastructure Strategy and emerging environmental plans) with the commitments of the Local Plans and the objectives and proposed outcomes of the Oxfordshire Plan 2050 need to be made very clear.**

3.3. The political resilience of the Oxfordshire 2050 Plan

14. The district and city councils are, and may remain, of several political persuasions and each council should remain free to do what it sees to be in the best interests of its constituents. The strategic spatial plan has most credibility (in terms of its legitimacy and resilience) when dealing with

¹ Cherwell District Council (Adopted July 2015, 2011-2031); Cherwell District Council (Part 1 Partial Review: Oxford's Unmet Housing Need, Adopted September 2020, 2011-2031); Oxford City Council (Adopted June 2020, 2016-2036, Review 2040 initiated); South Oxfordshire District Council (Adopted December 2020, 2011-2035); Vale of White Horse District Council (Adopted December 2016, 2011-2031); and West Oxfordshire District Council (Adopted September 2018, 2011-2031).

² To be more precise, it is not 'growth' which is committed (whether it materialises or not remains to be seen) but rather the allocation of sites to accommodate anticipated or hoped for growth.

³ Also, Local Plans are not just about allocating sites for development. Many of the Oxfordshire 2050 Plan policies are concerned with issues and standards to be adopted in development management and these can be incorporated into Local Plan reviews well before the nominal end date of currently adopted plans.

strategic matters, which are truly matters for joint decision making, as in the need for and location of strategic facilities (a regional hospital or cross border transport corridors, for example).

15. **But, although it may be desirable for the joint body responsible for the Oxfordshire 2050 Plan, the Future Oxfordshire Partnership, to promote climate change mitigation and adaptation standards (as the draft Plan does), because of the voluntary nature of the joint body, it cannot be certain that this kind of Oxfordshire 2050 Plan policy is resilient politically.** Similarly with the fundamental question of the scale and pace of anticipated employment, population and housing growth and the location of that growth across the county and between the district and city councils.

16. **In essence the possibility of policy change arising from a change in political composition is no different from any ordinary local authority function. The key difference stems from the Future Oxfordshire Partnership being a voluntary body, so the question arises about its continued existence. If, how and with what consequences would it be possible for an individual authority to secede from the Future Oxfordshire Partnership and if the Future Oxfordshire Partnership itself collapses what significance, if any, would the Oxfordshire 2050 Plan continue to exert in the planning process?**

4. Plan Section 1.4 - What is the Oxfordshire Plan seeking to achieve

17. There can be no argument about the components of good growth listed in the consultation document. The question is how can good growth be achieved. In our view “Good growth” means increasing the well-being of people and the planet. To achieve it, economic, social and environmental objectives need to be actively aligned in the planning process. **Oxford Civic Society believes that integrated strategic planning is the best tool for achieving good growth. For example, in terms of spatial planning, the quantum and locations of housing, employment sites, transport routes, climate change mitigation and adaptation and inclusivity need to be considered as being completely inter-dependent.**

5. Plan Section 1.5 Relationship with other plans and strategies and the public

18. It is agreed that the context for plan making will continue to evolve as new strategic influencers emerge at national, sub-national or local level, or as others change. Oxfordshire will be shaped by these strategic influencers to varying degrees over the next 30 years. It is said that this is reflected in the emerging Oxfordshire Plan but we are not convinced. **As noted above, to do this we need a continuous strategic planning process with associated governance arrangements including joint staffing.**

5.1. Relationship with the public

19. **Unfortunately, the public has not been incorporated into the recent and continuing process of the generation of close partnerships. This includes the Oxfordshire Growth Board, which, despite re-naming as the Future Oxfordshire Partnership, remains a threatening mystery to many. Even more so the evolving partnerships around the Oxford-Cambridge Arc have until very recently excluded the public.**

20. Enormous efforts are now being made to include the public, but not before opposition has grown, encouraged by years of poor public relations. **Public concern centres on the scale and pace of housing development and employment growth, but also with environmental concerns, many of**

which are very well researched and significant. These kinds of concerns are common to the Arc and Oxfordshire 2050 Plan.

5.2. Relationship with the Local Transport and Connectivity Plan

21. The consultation document notes that the Oxfordshire Plan needs to *“take account of and support wider infrastructure and transport strategy development”*. This statement does not reflect the kind of integrated planning that is needed. The transport planning and development planning should never be seen to be separate activities. The spatial development plan which is the Oxfordshire 2050 Plan must fully integrate its development planning thinking and its transport planning thinking.

22. The consultation document continues to state that it will be *“particularly important that the Oxfordshire Plan complements and supports the new Oxfordshire Local Transport and Connectivity Plan (LTCP)”*, but again this does not reflect the needed approach – which is that the Oxfordshire Local Transport and Connectivity Plan and the Oxfordshire 2050 Plan should be seen as one plan and developed as one plan.

23. This problem becomes more evident later in the consultation document when spatial strategy options are discussed. Spatial strategy option 3 is to focus on opportunities in sustainable transport corridors and at strategic transport hubs. But every spatial option should focus on this, the corridors and hubs being determined by integrated development and transport planning thinking.

5.3. Relationship with Oxford Infrastructure Strategy

24. Somewhere in the draft Oxfordshire 2050 Plan and Oxfordshire Infrastructure Strategy clear expositions are needed of the location of key infrastructure, its capacity to serve existing employment and housing needs and its potential to meet increasing demand in selected locations. Such an exposition is not found in the documents of either the draft Plan or the revised Strategy. This makes an assessment of spatial options meaningless.

25. It also raises the question of another omission which is that the indicative cost of spatial strategy options will need to be considered. We know that there is a massive shortfall of infrastructure funding and the Oxfordshire 2050 Plan and Oxfordshire Infrastructure Strategy need to address this with indicative costs of spatial strategy options along with recommendations for innovative financing. The draft Oxfordshire 2050 Plan does not do this.

26. A contribution to financing infrastructure could, for example, come from the application of a variety of land value capture arrangements. Land values increase for many reasons and some of the most significant increases arise from public policy decisions, in particular the granting of planning permission (or, more precisely, the designation as a development site in a Local Plan) and the provision of new infrastructure. While there is considerable variation in land value uplifts dependent upon location and previous land use, landowners currently retain a very large proportion of the increase in land value arising from the granting of planning permission. **Capturing some of this increase in land value in order to fund the provision of public infrastructure could be recommended.** In the 2018 Housing and Growth Deal negotiations between Oxfordshire and the Government it was suggested by the Government that Oxfordshire might assess the viability⁴ of a Strategic Infrastructure Fund (a land

⁴ A key issue is that the NPPF puts viability as a higher priority than policies such as % of affordable housing. As long as land value is assessed by comparators, rather than as a residual of development cost, viability is always going to jeopardise achievement of policy aspirations.

value capture arrangement). Was this suggestion taken up – could it be taken up by the Oxfordshire 2050 Plan?

27. **How to prioritise infrastructure investment to support a spatial strategy is a key question. Our main concern is with the Oxfordshire Infrastructure Strategy notion of ‘prioritisation’ and how this is arrived at.** The system of appraisal is immensely ambitious in attempting to provide a common basis of assessment across vastly different types and scale of schemes aimed at quite different objectives and in different spatial settings. The validity of this is especially questionable when individual scores are aggregated in order to assist prioritisation. At present this aggregation is carried out for needs within each Oxfordshire Infrastructure Strategy theme and in combining the results of the needs and growth appraisals.

28. **Our fundamental objection to such aggregation is that it appears to invite decision-makers to adopt simple numerical ranking of overall scores as the basis of scheme prioritisation without full consideration and appreciation of wider development issues. This should also be a matter of concern to the Oxfordshire 2050 Plan – prioritisation of infrastructure investments is a crucial step in Plan preparation.**

29. **Also, it needs to be remembered that the Future Oxfordshire Partnership is not in the position of exerting its view of priorities over all providers.** Formally it does not have jurisdiction over even the executive responsibilities of its own members. In practice there is a range of providers including commercial businesses acting autonomously, each of which has its own sources and criteria for funding. It is not clear how the sponsor of a particular type of scheme, being aware of the appraisal scores of a different sponsor or scheme type can or should influence its actions. Funds such as the Growth Deal which allow for a diversity of schemes and over which the Partnership is able to exercise discretion (and hence where prioritisation is applicable) are the exception, but only provide a small fraction of the total.

5.4. Relationship with the Arc

30. **It is also said in the consultation document that the Oxfordshire Plan will play an important role in helping shape the emerging Spatial Framework for the Oxford-Cambridge Arc. This needs more discussion, as it is the fear of many that the reverse is likely – the Arc will shape the Oxfordshire 2050 Plan.** Ideally a locally determined strategic spatial plan would have the role of advising the Government on local growth priorities and how these would support national spatial objectives (e.g., the ‘Levelling-up’ agenda and the Oxford Cambridge Growth Arc) and on quantum and distribution of growth (including local plan housing targets). But there are many indications that top-down influencing is more likely.

31. **It would be helpful if the Oxfordshire 2050 Plan team or Future Oxfordshire Partnership (formerly the Oxfordshire Growth Board) could confirm that there is an agreement with Government that the Oxfordshire Plan 2050 (requested by Government, originally) will be used to advise Government on local growth priorities.**

32. The strength of the argument for promoting the Arc is clear. Oxfordshire has a strong and growing knowledge intensive economy and is a net contributor to the UK exchequer, delivering £21 billion per year to national output. It competes on a global stage as a centre of science and innovation, with two universities and unique research organisations and activities. **As with the Oxfordshire 2050 Plan, the Oxford Civic Society’s view is that justified growth is acceptable, if managed well. We are not anti-growth.**

33. **But the question arises of the role of the Oxfordshire 2050 Plan once an Arc Spatial Framework is in place, with the status of national planning policy. Will there be any need of it, assuming that local plans will continue to be needed by the current local planning authorities (or possibly by replacement unitary authorities).**

34. The current intention is to publish a draft Arc Spatial Framework for consultation in Autumn 2022, following the publication of a Vision for the Spatial Framework in summer 2021. It would be helpful if there could be an explanation of the way in which the preparation of the Oxfordshire 2050 Plan and the Arc Spatial Framework can be synchronized and coordinated. **It is not enough to say that the Oxfordshire 2050 Plan will influence the Arc Spatial Framework – the influence comes from developing concepts and policies together in well-coordinated and fully synchronized working and with full and continuing engagement with local partners and the public.**

5.5. Plan Section 2.1 - Themes and policies in general

35. **OCS generally welcomes the emphasis given to addressing climate change, improving environmental quality and creating strong and healthy communities. These themes demonstrate that the environment and inclusivity are key components of a spatial plan for the county, in addition to the economy, housing and transport.**

36. **It is important to stress that addressing climate change, improving environmental quality, creating strong and healthy communities, planning for sustainable travel and connectivity and creating jobs and providing homes (the five themes running through the Draft Oxfordshire 2050 Plan) are not independent of each other, in silos.**

37. **An integrated strategic planning framework would need to see these as interdependent. Changes in the policies of one will necessitate accommodating changes in the policies of another or others. Agreeing or disagreeing with the preferred policies of one or more of the themes requires reviews of the preferred and alternative policies of other themes. For this reason, the request, as it is made, to assess thematic policy options, is extremely difficult if not impossible.**

6. Plan Section 2.2 - Theme One – addressing climate change

38. 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). **In principle this is all agreeable, but major reservations have been voiced concerning the approach to nature recovery and natural capital and the level of political commitment at national and local levels to act as vigorously as necessary.**

39. As noted in the course of the Oxford Civic Society Debates held in May 2021 on How can we ensure Good Growth in Oxfordshire, if we accept the science of climate change, then we must accept the need to act. That action is needed now at every level from the global to the personal. Local action has important roles:

- Tackling the ‘implementation gap’ between national policy and actual change
- Local can lead: innovation starts somewhere (like Oxfordshire)
- Pushing for change: stronger policies and faster action
- ‘Being the change’ – every organisation, household and individual

40. If we are to respond effectively in Oxfordshire, we need to commit to meeting our agreed targets and plan to reduce emissions: we are a county with resources and innovation skills – can we ‘meet and beat’ the UK zero carbon target? In other words, we agree with the ambitions of the climate change theme and we cannot wait for national policy to change before acting. But we must be sure that what we do is truly environmentally and socially beneficial.

41. There are already many plans that need to integrate with this work including the various Local Plans, the Oxfordshire 2050 plan and the Local Transport and Connectivity Plan (both upcoming), council Climate Action Plans, and the Oxfordshire Infrastructure Strategy.

42. Our councils and associated bodies (Futures Partnership, LEP) are responding. The words are there: “If we are successful, by 2050⁵, Oxfordshire will have achieved carbon neutral status, and be accelerating towards a carbon negative future, removing more carbon than it emits each year”. (The Future Oxfordshire Partnership). The new County Council in the ‘Oxfordshire Fair Deal Alliance’ has set goals of which the first is: Tackle the Climate Emergency through rapid decarbonisation, proper accounting of carbon emissions and ambitious targets, as well as supporting climate resilience.

43. But at present we are not making the necessary emission cuts across the county. The Covid crisis has seen emissions fall by 11% across the UK in a year. To keep temperature rise to 1.5°C we need to make cuts on this scale every year for the next decade. Councils and agencies across the county will need to⁶:

- Collaborate towards shared goals and set a county route map to zero carbon;
- Tackle the local planning problems that work against climate solutions
- Build cross-sector consensus on the work to be done
- Push for central government to support local innovation and action

44. The main sources of emissions in Oxfordshire are transport and buildings and effective change can be delivered now by local action. The technical solutions we need exist or are on their way. Political commitment and resourcing are what are required and what the Oxfordshire 2050 Plan can help to provide.

7. THEME TWO – Improving Environmental Quality

7.1. POLICY OPTION 8 - Biodiversity Net Gain

45. **We support the proposal of 20% biodiversity net gain. As noted earlier there are major reservations concerning the approach to nature recovery and natural capital especially. Great care needs to be taken to ensure that methodologies and decision-making protocols are sound.**

7.2. POLICY OPTION 10 – Green Belt enhancement

46. **There is no evidence here of an objective analysis of the current or potential impact of the Green Belt on addressing climate change, improving environmental quality, creating strong and healthy communities, planning for sustainable travel and connectivity and creating jobs and providing homes.**

⁵ Although the English Economic Heartland and Oxford-Cambridge Arc emerging plans suggest 2040 as a zero-carbon target date. Should not the Oxon 2050 Plan be consistent?

⁶ As agreed in the series of Oxford Civic Society Debates held on May 15th and 22nd 2021 on How can we ensure Good Growth in Oxfordshire? (Debate #4: Climate change: the path to net zero)

47. For example, adopting a ‘compact city’ approach to urban development in Oxfordshire (a compact Oxford City linked by public transport corridors with compact market towns for example) might imply not only increasing densities, but also development around the periphery of the Oxford urban area, at the same time maintaining or augmenting the objectives of Green Belt policy. For example, it could be done in a planned way and would not be unrestricted sprawl. It could be done in ways that retain the identity of neighbouring settlements, clearly safeguards villages beyond the Green Belt from encroachment and preserves the setting and special character of the urban area – Oxford).

48. Such development can be immensely beneficial in environmental and social terms. A proposal for such an approach in Oxford has been made, demonstrating that small Green Belt land-take can provide significant benefits⁷.

8. THEME 4 – Planning for Sustainable Travel and Connectivity

49. The Committee on Climate Change views the decarbonisation objective not solely as a matter of transitioning to zero emission vehicles **but of exploiting opportunities to reduce total vehicular travel distance. There are three possible avenues for achieving this and these are reflected in the draft Vision Statement for the County Council’s LTCP5:**

- **By reducing average trip lengths**
- **By digital substitution of physical transport and**
- **By shifting car driver trips to more sustainable modes.**

50. Settlement characteristics vary greatly across the county and the opportunity for delivering these outcomes varies likewise. Hence the key complementary role of spatial planning in steering future development to more favourable locations (as advocated in NPPF). This has implications for spatial options in the Oxfordshire 2050 Plan. There is a strong presumption in favour of enlarging existing urban areas (since more types of journeys are practicable with shorter average distances and less car use). But inter-town movements in Central Oxfordshire are also significant, especially for access to workplaces. Corridors with attractive choices for non-car travel are an additional spatial development option (e.g., Eynsham Garden Village and investment in A40 bus and cycle lanes).

51. **OCS would like to see proposals for local enhancement of rail services incorporated within a more comprehensive ‘Metro’ network. This would include principal bus services and purpose-built hubs for interchange and access modes to provide a ‘whole journey’ offer for sustainable travel.**

8.1. POLICY OPTION 21: Strategic Infrastructure Priorities

52. **A further Reg 18 consultation on strategic spatial options would be appropriate once further detail of the strategic infrastructure framework is available, as discussed in Sections 5.2 and 5.3 above).**

⁷ The 2014 Wolfson prizewinning report by URBED on potential Garden Cities included a case study about the development of Oxford. This showed that by putting extensions round the edge and taking just 10 per cent of the green belt all the necessary housing could be accommodated. Using Land Value Capture would cover all the costs of the infrastructure and develop the city in a reasonable way. The report can be viewed here:
<http://urbed.coop/sites/default/files/URBED%20Wolfson%20Submission.pdf>

9. THEME FIVE – CREATING JOBS AND PROVIDING HOMES

9.1. POLICY OPTION 22 – Supporting the creation of Jobs

53. The Oxfordshire Plan is aligned with the Oxfordshire Local Industrial Strategy and seeks to maintain the economic success of the county over the long-term. 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.

54. Like many issues affecting land use planning, the UK approach to regional and local economic growth is changing. This is partly due to COVID-19 and Brexit, as well as the Government's focus on 'levelling up' across the UK and its 'Plan for Growth', launched alongside the March 2021 budget. The current Oxfordshire LIS responds to the UK Industrial Strategy which aims to increase growth and productivity, creating more prosperous communities, much of which is core thinking in the emerging Government approach.

55. The key sectors and technologies in which Oxfordshire excels have global reach, meaning Oxfordshire is a critical driver for UK economic growth post-Brexit. The Oxfordshire 2050 Plan is one of the tools by which this economic success is to be maintained.

56. The LIS identifies key assets in the innovation ecosystem which underpin that strategy; the LIS looks to build on these strengths and assets to drive R&D and innovation across the region. The Oxfordshire Plan seeks to strengthen the economic activity taking place in our town and city centres, and on the business and science parks located across the county, as 'priority locations', and it supports those priority sectors where strategic jobs growth is focussed, as identified in the LIS. The Oxfordshire Plan supports the creation of jobs across a range of sectors and in various locations, particularly to achieve the shift to 'good growth' as the economy begins to transition to address climate change.

57. 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.

58. The proposed policy option could be to consider the level of jobs growth using the OGNA trajectories to identify the employment growth figure for Oxfordshire for 2020-2050. Economic growth and housing growth would need to be aligned and take into account a range of other factors. The decision on the appropriate level of jobs growth would be taken alongside the final decision on the housing growth figure that will draw on the OGNA scenarios. **Unfortunately, there is widespread public scepticism concerning the OGNA scenarios. A review of all approaches to determining housing and employment projections is needed to ensure that the Oxfordshire 2050 Plan has a firm foundation, with widespread support, including from the public. Such a review should take place in the very near future and well before the next Regulation 19 consultations.**

9.2. POLICY OPTION 28 – HOMES – HOW MANY? COMMITMENTS AND LOCATIONS. HOW MANY HOMES?

59. **As noted above in Section 9.1 a review is needed of all approaches to determining housing and employment projections. We understand that the long-term impacts of both Brexit and Covid have yet to play out and there is inevitable instability in the figures, especially over such a long time period. But these assessments of the scale and pace of growth require a cautious approach, focusing on qualitative as well as quantitative assessments. A critical issue is the central government**

insistence on reliance on planning to resolve the crisis in affordable housing, which is, in reality, multi-faceted.

9.3. POLICY OPTION 30 - AFFORDABLE HOUSING

60. As also noted in the series of Oxford Civic Society Debates held in May 2021, Oxford's housing problems are a local but intense reflection of the national picture. The biggest issue is affordability. Only the rich find houses affordable in the city, and those doing vital jobs even with reasonable incomes cannot compete in the market. This has a negative impact on recruitment and hence economic performance. Housing policy has led to over half of Oxford's population being tenants rather than owner-occupiers – partly due to transients (those on short- or fixed-term contracts). The government's principal answer to build many more new homes: thus, the OGNA assesses the need as around 101,500 between 2020 and 2050, of which around two-thirds should be 'affordable'. Oxford city is already intensively developed so housing growth spills into the surrounding countryside - something fiercely opposed by local communities. Solutions which have been suggested include⁸:

- Local Authorities must be given the powers to acquire land, and acquire it at a value determined by its existing planning status;
- Local Authorities must be the beneficiaries of the uplift in land value resulting from consent to development;
- Property taxation should be applied to the value of the site, not the buildings on it and even if the land is undeveloped;
- Local Authorities must be empowered to build genuinely affordable homes;
- The minimum term for Assured Shorthold Tenancies should be extended to 3 years

61. Although these do sound like radical ideas, in fact they largely represent a return to policies enshrined in the 1947 Town and Country Planning Act, which have been steadily eroded ever since. **What is needed is enough homes which ordinary people doing vital jobs can afford, built in the right places.**

10. SPATIAL STRATEGY OPTIONS

62. **The consultation document sets out 5 options for spatial distribution. We take the view that without a clear and credible assessment of the scale of and pace of growth, without a clear assessment of the location of key infrastructure and its current and potential future capacity and without an indication of the cost implications of the spatial options, there is really little value in saying which may be preferable. In addition, Option 3 should be integrated into all options, as discussed above.**

63. **Our biggest concern however is that the plans that have been provided show the options on an overlay of the current employment and housing commitments of the adopted local plans. In other words, the Oxfordshire 2050 Plan is being assessed for its compatibility with adopted Local Plans that were prepared without the benefit of a strategic-level spatial framework to work within.**

64. **This may be acceptable, but with so little information about the location of key infrastructure and its current and potential future capacity, and without an indication of the cost implications of the spatial options, we cannot judge this. There is thus little point in commenting on the options.**

⁸ As suggested in the series of Oxford Civic Society Debates held on May 15th and 22nd 2021 on How can we ensure Good Growth in Oxfordshire? (Debate #3: Homes and settlements)

**Oxfordshire 2050 Plan – Regulation 18 Stage 2 Consultation
RESPONSE OF THE OXFORD CIVIC SOCIETY**

65. It is, however good to see that in the consultation document it is suggested that the final Plan is likely to be a mix and match of the options (**although we would prefer that the final Plan is based on a systematic approach to integrated strategic spatial and infrastructure planning**).

Oxford Civic Society
October 2021