

OXFORD LOCAL PLAN 2040

Response to consultation on Preferred Options



Oxford Civic Society
December 2022



Draft Oxford Local Plan 2040

Oxford Civic Society response to preferred options consultation

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Introduction

1. This consultation response is in three parts. First, we present a summary of responses concerning the strategic context of the draft Local Plan and comment on what we think needs to be explained about the strategic context. Second and in Appendix 1 we provide detailed explanations of the strategic context of the Local Plan, as we see it. Third, in Appendix 2, we respond directly to the preferred options provided in the consultation document.

Summary Response to Consultation

- **Impact of the abandonment of the preparation of the Oxfordshire 2050 Plan** - until very recently it had been planned and hoped that the Oxford Local Plan 2040 and the Local Plans of neighbouring Oxfordshire local planning authorities would have the benefit of an agreed Oxfordshire-wide spatial plan (to 2050), with agreements county-wide on the rate and pace of employment and housing growth and the location of employment and housing growth. Preparation of this county-wide spatial plan has been abandoned by the county's local planning authorities as no agreement could be reached on countywide growth.

This means that the updating of the Local Plans of Oxfordshire's local planning authorities risks creating sub-optimal strategic infrastructure investment requirements. The effectiveness of climate change policies, and natural resource management is also at risk. Remnants of the work undertaken to support the Oxfordshire 2050 Plan remain – including the Vision for Oxfordshire 2050, which was agreed by all the Oxfordshire local planning authorities, working together in the Future Oxfordshire Partnership. The draft Oxford Local Plan can at least be aligned to this Vision and other county-wide strategies and plans prepared or being prepared.

- **Alignment with Oxfordshire Vision** - the immediate question then is how far do the draft Oxford Local Plan 2040 preferred options respond to these agreed ambitions. Is the draft Local Plan consistent with the vision and principles of good growth, providing a foundation for long-term sustainable development in Oxfordshire, including Oxford, and for developing the city's plans, strategies and investment programmes? This should be clear in the draft.
- **Alignment with Local Industrial Strategy** - with the abandonment of the preparation of the Oxfordshire 2050 Plan it is not at all clear how the Local Industrial Strategy will be reflected in the various Local Plan updates, including that of the City of Oxford. This needs to be clarified in the draft Oxford Local Plan 2040.
- The longer-term implementation of the Local Industrial Strategy will now need to be aligned with the growth policies of individual local planning authorities as will meeting the challenges of the implications of employment and housing growth on other matters (including climate change, environmental management, inclusivity, infrastructure capacity, public and private funding availability and institutional capacity to manage growth). How far does the Oxford Local Plan intend to implement the Local Industrial Strategy, what extent of employment and growth does that imply and what are the implications on other matters?
- **Countywide employment and housing growth** - what is not known is the employment and housing growth projection of each district council to 2040 and the longer-term trend projections to 2050. Are the various Local Plan updates altering the trends demonstrated up to and including the current Local Plans, as described in Table 1 in Appendix 1. In Oxford, the Local Plan update will not mean a big change in scale of growth, as it is already committed to 2036.
- It may however mean that locating unmet Oxford housing need in neighbouring authorities will no longer be possible in the period to 2040. This could be a profound matter for the Local Plan update, but does not appear to be a major policy issue in the draft Oxford Local Plan update preferred options consultation paper.

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- Whilst the impacts of the pandemic on the delivery of district and city council employment sites remains unknown, a summary of allocated floorspace yet to be delivered by OxIS Towns and Surrounds and OxIS Rural Communities is provided in Table 3 of Appendix 1. This indicates that most allocated strategic employment floorspace still to be delivered is in Oxford, Didcot and Wallingford, and Bicester.
- To achieve the housing provision specified in the current Local Plans, the completion rates need to accelerate significantly between now and the end dates of each Local Plan period. The biggest challenge will be in South Oxfordshire which will need to increase the annual rate of completions by a factor of 2.6. West Oxfordshire also has a challenge needing to increase its annual completion rate by a factor of 2.15. For the other Local Plans, the factors are Cherwell 1.86, Vale of White Horse 1.23 and Oxford City Council 1.12¹.
- Clearly previous housing targets were over-ambitious and the underlying constraints to housing completions need to be fully understood in setting targets in the updated Local Plans and the Oxfordshire 2050 Plan. This issue is even more profound with increased mortgage rates and a rapidly cooling housing market. Deceleration of house building can be expected over the next few years at least, unless the supply of employment new opportunities continues to be strong. There is no discussion of this in the preferred options consultation, nor is there discussion that provision of affordable housing may become more contentious in this scenario.
- As noted above, currently there are Local Plans for all District Councils and the City Council in Oxfordshire, as shown in Table 1 in Appendix 1. It is understood that the Local Plans are being updated and to extend their periods of effectivity to 2040. The Oxfordshire 2050 Plan was to have provided a strategic planning framework for the Local Plans but preparation of this plan has been abandoned because of disagreements between the local planning authorities on the most appropriate rates, pace and location of growth.

To repeat - this means that the Local Plan updates will not be working with a common and agreed scale, pace and distribution of employment and housing growth across the County. Is it necessary to have such an agreement to be able to prepare the Oxford Local Plan 2040 update in such a way that it complements the Local Plan updates on neighbouring authorities?

- **Oxfordshire 2050 Plan and fitting the Local Plan update into a coherent Oxfordshire spatial development strategy** - it was noted in the Oxfordshire 2050 reports that it was not the intention at earlier stages of Plan preparation to identify individual spatial strategy options that can necessarily accommodate all of Oxfordshire's growth over the next 30 years. Nor is any one of the options, taken in isolation, likely to form Oxfordshire's eventual long-term spatial strategy.
- This view is applicable to the question being asked in this Oxford Local Plan 2040 consultation – is there a strategic spatial strategy (which will be comprised of components from more than one of the options) which effectively deliver the Oxford City councils Plan's priorities and the outcomes set out in the Strategic Vision for Oxfordshire and be agreeable to the neighbouring local planning authorities.
- **Are existing Future Oxfordshire Partnership criteria useful to an evaluation of the draft Oxford Local Plan 2040?**

¹ A review of the initial results of the 2021 census suggest that the Oxfordshire Growth Needs Assessment (OGNA) underestimates the 2018 base population in Oxford, Cherwell, South Oxfordshire and West Oxfordshire (by calculation of the average annual rate of population growth 2011-2021 and applying that rate of growth to 2011-2018). The overall discrepancy for the county as a whole is about 15,276 i.e., the OGNA underestimated population growth in the county to that extent.

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- Oxfordshire 2050 Plan stakeholder engagement - the Plan was being shaped by public and stakeholder engagement. An initial formal Regulation 18 Part 1 consultation 'Introducing the Oxfordshire Plan' took place in February / March 2019. That consultation sought views on what the Plan's vision, aspirations, objectives and broad spatial strategy should be. The public's response to that consultation is set out in the Regulation 18 Part 1 consultation report².
- Taken together, the responses gave a very clear overall steer that there is an appetite for an approach that: is ambitious, radical, innovative and creative; is Oxfordshire-specific and reflective of local people's views; prioritises climate change, and focusses on social, economic and environmental wellbeing, and not solely on a narrow definition of growth.
- The public participation in the preparation of the Oxfordshire 2050 Plan should be acknowledged by the Future Oxfordshire Partnership and its constituent local planning authorities, including Oxford City Council. In preparing their updated Local plans, the local planning authorities should keep in mind the preferences made known in earlier public consultations.
- **Transport planning** - the timing of the Central Oxfordshire Travel Plan consultation appears not to be synchronized with the updating (to 2040) of the Local Plans of these District Councils and the Oxford City Council.
- In addition, it appears not to be cognizant of the differences of opinion about employment and housing growth rates and distribution of growth in these Districts and the City, and the consequent abandonment of the preparation of the Oxfordshire 2050 Plan.
- Exactly as was said in the OCS report published just before the Oxfordshire 2050 Plan abandonment, the links between the Local Transport and Connectivity Plan (and now Oxfordshire Travel Plans), the Local Industrial Strategy and the Oxfordshire Infrastructure Strategy need to be carefully considered. Optimisation of strategic infrastructure (including transport infrastructure) investment could be the major casualty of the abandonment of the Plan – care needs to be taken that the damage is limited.
- OCS asks the following questions:
 - How can the Oxford Local Plan 2040 be prepared without an assessment of likely transport policies and their implementation. Development plans and transport plans must be integrated³.
 - Should the preparation of COTP measures be synchronized, coordinated or, even better, integrated into the development planning of the District and City Local Plan updates? Would achievement of the COTP targets perhaps be made simpler with such integration?
 - Most importantly, should all the area travel plans be prepared in a synchronized way with the District and City Council Local Plan updating, and with the consequent benefit of ensuring strategic (cross District / City boundary) transport infrastructure planning. Currently the 19 area travel plans are being developed sequentially, whilst the five Local Plans are being progressed broadly in parallel.
 - Perhaps surprisingly whilst the location of strategic sites to be developed during the current plan period is identified, the associated planned transport improvements are not, even though these are likely to be the focal points of local change.
 - Baseline and forecasting data – the COTP reiterates the LTCP5 overall targets in respect of reducing car trips, zero carbon emissions and 'vision zero' accidents. However, it does not establish what the

² <https://oxfordshireplan.org/wp-content/uploads/2019/06/Reg-18-Part-1-Consultation-Summary.pdf>

³ The draft COTP does not even address the transport implications of the Local Plans already adopted!

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'baseline' conditions are for these or other attributes in the Central Oxfordshire area, the projected change during the plan period (to 2040), or the likely impact proposals put forward in the plan would have (i.e., their potential effectiveness).

- We are very disappointed by this absence of a strategic level piece of work to document the baseline and impact of forecast changes from interventions proposed in the Central Oxfordshire Travel Plan. If the baseline is not stated and the value of the interventions in aggregate is not forecast, how can the Cabinet know that they will be sufficient to meet their high-level objectives? This is just wrong.
- Do all major transport issues need to be discussed in the draft Oxford Local Plan 2040, with policy options for consideration by the County Council? Development plans and transport plans must be integrated.
- Are County Council Local Transport and Connectivity Plan criteria useful to an evaluation of the draft Oxford Local Plan 2040?
- **Oxfordshire Infrastructure Strategy** - do strategic infrastructure issues need to be discussed in the draft Oxford Local Plan 2040, with policy options for consideration by the County Council and other stakeholders? How can the Oxfordshire' Infrastructure Strategy and Oxford Local Plan 2040 be aligned?

CONCLUSIONS

- There are three 'elephants in the room' – the big issues which the Draft Oxford Local Plan 2040 needs to deal with – the rate and pace of employment and housing growth in Oxfordshire and the role of the city, climate change and development funding. To deal with them properly the preparation of the Oxford Local Plan 2040 needs to work effectively with neighbouring local planning authorities and other agencies. Currently this is required to be through a Duty to Cooperate.
- **Rate, pace and location of employment and housing growth** - housing needs and provision is one of the top issues that the Local Plan must address, and where the duty to co-operate is essential. The NPPF states that authorities must work to address housing needs within their housing market area. It also expects authorities to co-operate on meeting one another's housing needs if it cannot be accommodated within the authority where it arises.
- Consistent with this guidance, the City Council was working jointly with neighbouring authorities to produce the Oxfordshire Plan 2050. But no more. Part of the evidence base for this plan included the Oxfordshire Growth Needs Assessment, which set out scenarios for housing and employment growth. The local planning authorities have noted that they will continue to work together to support this process to assign housing requirements across the county according to an agreed spatial strategy. This is a huge commitment and it is not at all clear how it can be achieved through the Duty to Cooperate (when it was not achievable with the central government grant condition of a Joint Spatial Plan being prepared).
- Employment - another issue for the Local Plan will be economic growth, ensuring that the city can continue to play its role in the local and national economy. The City Council is a board member of the Oxfordshire Local Enterprise Partnership (OxLEP) which has developed the Oxfordshire Local Industrial Strategy (LIS) in partnership with the business community, academic institutions and the other Oxfordshire Local Authorities. It has also signed a City Deal in 2014 with partners and the government to bring around £55.5 million of government funding (over £1.2 billion including private finance) that can be used locally to boost innovation and business growth, create jobs and help secure Oxfordshire's place as a world leader in technology, knowledge and expertise.
- Close working with the other Oxfordshire authorities and the LEP will be required in this area. However, Oxford's reach as a location to work goes beyond the Oxfordshire authorities, and will therefore require co-operation with a wide range of other local authorities, and other bodies. Provision of retail, leisure and other

commercial development Oxford city centre plays an important sub-regional role and co-operation with neighbouring authorities is essential as current and future populations will not shop exclusively in their own areas, but will travel to others. An update of the retail and leisure study is likely to be commissioned to understand likely need in the plan period.

- **Climate change** - managing flood risk will be a key element of Oxford's climate change mitigation plans, involving the Environment Agency, Oxfordshire County Council and neighbouring authorities. Carbon reduction and associated emissions and air quality issues also play a part in preparing the city for changes associated with climate change. Is climate change given enough emphasis in the Draft Local Plan options?
- **Funding** - it would be helpful to have funding options included in the assessment of preferred options. Sources of funds and the likelihood of funding being available (particularly in the medium term, with public spending cuts expected).

Appendix 1 - the strategic planning context of the Oxford Local Plan

1. Why is this important and relevant to this consultation

2. The City of Oxford is not independent of its neighbouring local planning authorities, the county council, the region in which it sits, other regions and national policy. Locally, the economic reach of the city is way beyond the city's administrative boundaries, as demonstrated in simple terms by commuter mapping⁴.

3. Until very recently it had been planned and hoped that the Oxford Local Plan 2040 and the Local Plans of neighbouring Oxfordshire local planning authorities would have the benefit of an agreed Oxfordshire-wide spatial plan (to 2050), with agreements county-wide on the rate and pace of employment and housing growth and the location of employment and housing growth. Preparation of this county-wide spatial plan has been abandoned by the county's local planning authorities as no agreement could be reached on countywide growth.

This means that the updating of the Local Plans of Oxfordshire's local planning authorities risks creating sub-optimal strategic infrastructure investment requirements. The effectiveness of climate change policies, and natural resource management is also at risk. Remnants of the work undertaken to support the Oxfordshire 2050 Plan remain – including the Vision for Oxfordshire 2050, which was agreed by all the Oxfordshire local planning authorities, working together in the Future Oxfordshire Partnership. The draft Oxford Local Plan can at least be aligned to this Vision and other county-wide strategies and plans prepared or being prepared.

4. A report prepared by Oxford Civic Society⁵ described in detail relevant strategies and plans that had been prepared or were being prepared and their essential linkages. This consultation response draws on this earlier report.

⁴ OCS also noted that the most recent iteration of the Oxford Economic Strategy does not acknowledge that the city's is a city-region economy.

⁵ Oxfordshire in 2050 – Linking Oxfordshire's development policies and strategies – a briefing note, OCS July 2022 (available on OCS website <https://www.oxcivicsoc.org.uk/>)

2. Where we are now⁶ - the Oxfordshire Vision

5. At the end of 2020, the Future Oxfordshire Partnership⁷ undertook a public engagement exercise asking for public feedback on a Draft Strategic Vision for Oxfordshire. Following consideration of the responses received, a revised draft was endorsed by the Partnership on 22 March 2021⁸. This draft was then approved by each of Oxfordshire's councils.

6. The Strategic Vision for Oxfordshire⁹ establishes a common and shared ambition to guide the focus of Oxfordshire's plans, strategies and investment programmes. The intention is that the Vision will be used to help create an agreed set of long-term, strategic economic, infrastructure and environmental priorities designed to deliver the outcomes that local people want.

- ***Expected outcomes of the Vision***

7. By 2050 Oxfordshire will:

- **Be a globally competitive economy** which is sustainable, diverse and inclusive, generating high-quality, productive and knowledge-based employment for our communities. It will utilise the county's strengths and resources, including its world-class universities and world-leading research, innovation and technology assets. There will be improved educational attainment and a skills system aligned to the needs of business and communities, helping to provide the conditions in which all Oxfordshire's people can benefit and thrive.
- **Have transformed movement and connectivity** within the County and beyond. There will be greater digital connectivity and physical mobility in and between places in ways that enhance environmental, social and economic wellbeing, with an emphasis on sustainable travel, including walking and cycling.
- **Be the first generation to leave the natural environment in a better state than that in which we found it.** The natural environment will be more biodiverse, support social, economic and ecological resilience and have the capacity to adapt to change.
- **Have flourishing, diverse and vibrant communities** rooted in pride with our local, national and international connections and a strong sense of civic identity. Individuals and families will support each other in partnership with sustainable public services, a thriving voluntary and community sector and be connected to dynamic and socially responsible businesses.
- **Have a healthier and happier population with better physical and mental health.** Young people will feel confident, positive and excited about their future and people will spend more of their later life active, in good health and with care available in their communities to meet their changing needs.
- **Have energy efficient, well-designed homes, sufficient in numbers, location, type, size, tenure and affordability** to meet the needs of our growing economy, young people, residents and future generations.

⁶ It is commonly understood that English development planning and management is highly centralised. It is not possible to describe development planning in Oxfordshire without reference to the abundant policy measures established at national level which are implemented locally in Local Plans. For the sake of brevity this discussion is not pursued here. For more information, please refer to the OCS report Linking Oxfordshire's development policies and strategies – a briefing note, OCS July 2022 and its Annex 4.

⁷ The Future Oxfordshire Partnership is a joint committee of the six councils of Oxfordshire together with key strategic partners. Following an extensive public review in 2020, the Partnership has a new purpose to: (i) coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefits; (ii) support the development of local planning policy that meets the UK Government's stated aim of net zero carbon by 2050, and contributes towards biodiversity gain whilst embracing the changes needed for a low carbon world; and (iii) seek to secure funding in the pursuit of these aims and oversee the delivery of related work programmes delegated to it by the joint committee's constituent local authority members.

⁸ The Vision was very welcome – but it did arrive a little late, after the Local Industrial Strategy approval, for example, and after work had started on the Oxfordshire 2050 Plan, Oxford Infrastructure Strategy and Local Transport and Connectivity Plan and supporting studies.

⁹ Details of the Vision can be found on this link (ignore spelling mistake): [Oxfordshire's Strategic Vision for Long-Term Sustainable Development \(futureoxfordshirepartnership.org\)](https://futureoxfordshirepartnership.org)

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- **Enjoy a built and historic environment** which is rich and diverse, comprising high-quality places where people want to live, work, visit and invest. Our rich and distinctive internationally recognised heritage assets, visitor economy and vibrant cultural offer will have been further enhanced and there will be improved access to them.
- **Be a more equal place, supported by inclusive growth** that gives everyone a fair chance in life to prosper. Deprivation and disadvantage will have been tackled wherever it manifests itself in our urban and rural areas, and discrimination will have been removed.
- **Have achieved carbon neutral status, and be accelerating towards a carbon negative future**, and be accelerating towards a carbon negative future, removing more carbon than it emits each year. Energy production will be sustainable.
- **Good Growth**

8. The Future Oxfordshire Partnership's definition of 'good growth' forms the basis for a set of guiding principles for future development. The Future Oxfordshire Partnership's definition of good growth is set out below:

Good growth in Oxfordshire will:

- **Be clean and green**, placing the county at the leading edge of UK and global de-carbonisation efforts by maximising all opportunities to significantly reduce Oxfordshire's carbon footprint, and increasing natural capital across the county.
- **Be sustainable**, focusing development in ways that enhance quality of place and at locations which enable people to live and work nearby, improving digital connectivity and avoiding unnecessary travel in the first instance, but using opportunities to increase movement by sustainable and active modes of travel when needed.
- **Embrace innovation** based on our technology sectors and knowledge-intensive activity, and develop new innovative solutions for working, learning, mobility, health care, resource management, sustainable design and improved public services.
- **Be healthy** and inclusive, with all development addressing inequalities and contributing positively to the overall health and wellbeing of Oxfordshire's communities, environment and economy.
- **Facilitate environmental improvements** and make efficient use of Oxfordshire's natural resources and land.
- **Enhance and expand access to the county's internationally significant historic environment and cultural and heritage assets.**
- **Support diverse, accessible employment**, generating a highly productive and inclusive economy based on our world-class research, innovation and technology.
- **Expect high-quality development** which will have a positive impact on communities in terms of design, energy and water efficiency and public realm, utilises low-impact building and construction methods and materials, and is properly supported by the necessary infrastructure including excellent digital connectivity. Everything we build or design in Oxfordshire will be fit for purpose in the world of 2050, respond to different circumstances, contribute to Oxfordshire's sense of distinctiveness and rich variety, and support connected communities.
- **Build resilience to change**, with growth planned in ways that: build on strengths and assets to support communities during periods of change; support economic diversity and can accommodate changes in technology; recognise changes in the way that people live and work and changing demographics; and respond to global impacts, particularly from climate and economic changes.

9. The immediate question then is how far do the draft Oxford Local Plan 2040 preferred options respond to these agreed ambitions. *Is the draft Local Plan consistent with the vision and principles of good growth, providing a foundation for long-term sustainable development in Oxfordshire, including*

Oxford, and for developing the city's plans, strategies and investment programmes? This should be clear in the draft.

3. Existing strategy and plans

3.1. Local Industrial Strategy

- **The purpose and scope of the Local Industrial Strategy**

10. Launched in 2019, (after the adoption of all the current District Local Plans and the current Oxford City Local Plan), the Oxfordshire Local Industrial Strategy sets out an ambition for the region to be one of the top three global innovation ecosystems by 2040. Published jointly with the Government in July 2019, the strategy is a powerful statement of Oxfordshire's leadership role in the UK's economy, and the responsibility it holds in driving forward the nation's success on the global stage¹⁰.

11. The Local Industrial Strategy was prepared by the Oxfordshire Local Enterprise Partnership and responded to the UK's 2017 Industrial Strategy¹¹, government's long-term plan to boost productivity by investing in skills, industries and infrastructure. It was anticipated that growth will be driven by innovation and higher productivity - both in emerging sectors which would harness transformative technologies, and in sectors that have historically driven the local economy. It aimed to be inclusive, place-sensitive and sustainable, responding to increasing concerns around climate change, and it was intended to enhance the natural environment and the quality of life for everyone in Oxfordshire.

12. The Strategy is important as it would have underpinned the Oxfordshire 2050 Plan, and does still underpin the Oxford Infrastructure Strategy, Local Transport and Connectivity Plan and updates to the district and city local plans. It would have been translated into the most ambitious of the three growth options of the Oxfordshire Growth Needs Assessment¹², determining the scale, pace and extent of employment and housing growth.

13. With the abandonment of the preparation of the Oxfordshire 2050 Plan it is not at all clear how the Local Industrial Strategy will be reflected in the various Local Plan updates, including that of the City of Oxford. *This needs to be clarified in the draft Oxford Local Plan 2040.*

- **The Oxfordshire Local Industrial Strategy – what now for the Investment Plan?**

14. In August 2020 the next stage of the Local Industrial Strategy was published, the Oxfordshire Investment Plan¹³. This Investment Plan takes forward the ambitions set out in the Local Industrial Strategy, translating its policy ideas and commitments into a programme for action and delivery. The Investment Plan also responds to the economic challenges which the pandemic created for businesses, supply chains and the workforce, and the need to build an inclusive economy for all

¹⁰ Oxfordshire Local Industrial Strategy: A Partner in the Oxford-Cambridge Arc, July 2019. Oxfordshire Local Enterprise Partnership, also published as a Policy Paper of the Department of Business, Energy and Industrial Strategy and the Ministry of Housing, Communities and Local Government, July 2019

¹¹ Please refer to Annex 4 which describes the links between national and local development policy (available on request from Oxford Civic Society)

¹² Please refer to Section 3.1.1 below

¹³ The Investment Plan Oxfordshire's Local Industrial Strategy, HM Government and Oxfordshire Local Enterprise Partnership, August 2020

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communities. The climate change emergency and the need to foster clean growth are additional key imperatives to which this Plan responds.

15. This Plan encompassed a programme of activity for the next ten years, initially to 2030, with further longer-term projects in development for the period on to 2040. By 2030, the portfolio aimed to deliver at least 24,500 new jobs (gross full-time equivalents), 344,400m² of new commercial and innovation floorspace, 29,400 new homes.¹⁴ All these targets can be accommodated in the current Local Plans, assuming the continued distribution of growth between the committed Local Plans.

16. The Investment Plan identified critical packages of enabling infrastructure which would need to be implemented within the Investment Plan. These infrastructure schemes include strategic rail projects, required to meet service enhancements identified in the Oxfordshire Rail Corridor Study; a programme of enhanced digital connectivity across the County, as outlined in the Oxfordshire Digital Strategy and Work Programme; energy requirements set out in the Oxfordshire Energy Strategy; and emerging infrastructure programmes focused on carbon reduction and enhancing green infrastructure and corridors. These enabling infrastructure initiatives are included in the Oxfordshire Infrastructure Strategy.

17. The longer-term implementation of the Local Industrial Strategy will now need to be aligned with the growth policies of individual local planning authorities as will meeting the challenges of the implications of employment and housing growth on other matters (including climate change, environmental management, inclusivity, infrastructure capacity, public and private funding availability and institutional capacity to manage growth). How far does the Oxford Local Plan intend to implement the Local Industrial Strategy, what extent of employment and growth does that imply and what are the implications on other matters?

3.2. Oxfordshire’s Local Plans

18. Currently there are Local Plans for all District Councils and the City Council in Oxfordshire, as shown in Table 1. It is understood that all the Local Plans are being updated and to extend their periods of effectivity to 2040. Synchronizing the Local Plans in this way will be very helpful (although synchronization does not mean coordination or harmonization).

Table 1: Current District and City Local Plans

District Local Plan	Adoption Date	Timeframe
Cherwell Local Plan (Part 1) 2011-2031	July 2015 (re-adopted December 2016)	2011-2031
Cherwell Local Plan (Part 2) 2011-2031 Partial Review	September 2020	2011-2031
Oxford Local Plan 2016-2036	June 2020	2016-2036
South Oxfordshire Local Plan 2035	December 2020	2011-2035
Vale of White Horse Local Plan 2031 (Part 1)	December 2016	2011-2031
Vale of White Horse Local Plan 2031 (Part 2)	October 2019	2011-2031
West Oxfordshire Local Plan 2031	September 2018	2011-2031

Source: District and City Councils

19. The current Local Plans identify agreed and legally binding employment and housing land-use targets up to the end of the periods of each Local Plan’s effectivity. This means that plans for the scale, pace and distribution of employment and housing growth are already fixed until: (i) 2031 (in the

¹⁴ Part of the committed new homes to be delivered by 2031 as agreed in the Oxfordshire Housing and Growth Deal and which are recognised in Local Plans

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Districts of Cherwell, Vale of White Horse and West Oxfordshire; (ii) 2035 (in South Oxfordshire District); and (iii) 2036 (the City of Oxford).

20. What is not known is the employment and housing growth projection of each district council to 2040 and the longer-term trend projections to 2050. Are the various Local Plan updates altering the trends demonstrated up to and including the current Local Plans, as described in Table 1. In Oxford, the Local Plan update will not mean a big change in scale of growth, as it is already committed to 2036.

21. It may however mean that locating unmet Oxford housing need in neighbouring authorities will no longer be possible in the period to 2040. This could be a profound matter for the Local Plan update, but does not appear to be a major policy issue in the draft Oxford Local Plan update preferred options consultation paper.

• **Employment and the Local Plans**

22. Over 500 hectares of strategic employment space is allocated within the various current District Local Plans. As indicated in Table 2, most of the space is split across Cherwell and the Vale of White Horse. The growth in the Vale of White Horse is associated with several key strategic sites in the Science Vale including Harwell Campus, Milton Park and the former Didcot Power Station. Notable employment sites are also allocated around Bicester and in several mixed-use communities, including the Salt Cross Garden Village in Eynsham.

Table 2: Summary of Strategic Employment Allocations in Local Plans

Adopted Local Plan	New Strategic Employment Sites – Total Allocation	Spatial Allocations Summary
Cherwell Local Plan 2011-2031 Part 1 2015*	212 hectares in addition to high value employment areas	<ul style="list-style-type: none"> • Allocation of large employment sites in Bicester (138.5 hectares), Banbury (61 hectares) and former RAF Upper Heyford (12 hectares) • High Value Employment Areas at Langford Lane / Oxford Technology Park / London-Oxford Airport and at Begbroke Science Park
Oxford Local Plan 2036	66 hectares (previous allocation of Core Oxford Strategy 2026)	<ul style="list-style-type: none"> • No new strategic employment sites are identified in the Local Plan • Provision of 9 hectares of employment land at Northern Gateway and 5 hectares in West End • Total of 52 hectares from sites and allocated housing sites • Protection of 174 hectares of existing employment sites**
South Oxfordshire Local Plan 2035	31 hectares	<ul style="list-style-type: none"> • Intensification of key sites including Culham Science Centre (7 hectares) and Oxford Science Park extension at Grenoble Road (10 hectares) • Key strategic sites at Berinsfield (5 hectares) and Chalgrove (5 hectares) as part of mixed-use sites as well as sites at Southmead (3 hectares) and in Wallingford (1 hectare).
Vale White Horse Local Plan 2031 Part 1 2016*	194 hectares	<ul style="list-style-type: none"> • Key strategic sites include Harwell Campus (128 hectares), Milton Park (28 hectares), Didcot A Power Station (29 hectares), Monks Farm (9 hectares) and Faringdon (3 hectares)
West Oxfordshire Local Plan 2031	69 hectares	<ul style="list-style-type: none"> • Key mixed-use sites where employment has been allocated includes a 'campus style' science park at Salt Cross Garden village (40 hectares) alongside allocations at Witney (18 hectares), Carterton (6 hectares) and Chipping Norton (5 hectares).

Notes:

*No additional strategic employment allocations are included in the Cherwell Local Plan and Partial Review of Vale of White Horse Local Plan Part 2

**Data informed by Oxford City Council Annual Monitoring Report

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Source: Oxford Infrastructure Strategy (OXIS) Stage 1 (2021-2040) – Technical Report

23. The Oxfordshire Growth Needs Assessment¹⁵ informing the now abandoned Oxfordshire Plan 2050, was intended to provide further clarity in relation to what the future job creation trajectory might be during the period of the Local Plans and beyond to 2040.

24. However, the still ongoing pandemic presents a series of unprecedented challenges to forecasting future employment trajectories. For example, there is uncertainty in relation to what the long-term impacts that the transition to remote working in service sectors of Oxfordshire’s economy will be, particularly how it impacts the relationship between the amount of proposed employment floorspace, and the number of jobs created.

25. Whilst the OxLEP Economic Recovery Plan¹⁶ forecasts that Oxfordshire could have around 6,000 fewer jobs by 2031 (relative to a pre-pandemic trajectory), it identifies that there is likely to be continued strong demand for the Research and Development floorspace property market¹⁷.

26. Based on information from the various Annual Monitoring Reports across the county, most of the allocated strategic employment sites in the District Local Plans are still to be delivered during the Local Plan periods.

27. Whilst the impacts of the pandemic on the delivery of district and city council employment sites remains unknown, a summary of allocated floorspace yet to be delivered by OxIS Towns and Surrounds and OxIS Rural Communities is provided in Table 3. This indicates that most allocated strategic employment floorspace still to be delivered is in Oxford, Didcot and Wallingford, and Bicester.

Table 3: Remaining Approximate Allocated Strategic Floorspace

Remaining Approximate Allocated Strategic Employment Floorspace still to be delivered by current Local Plans			
OXIS Town and Surrounds		OXIS and Rural Communities	
Oxford City	66 hectares	Berinsfield	5 hectares
Abingdon and surrounds	7 hectares	Chalgrove	5 hectares
Banbury	29 hectares	Eynsham & Long Hanborough	40 hectares
Bicester	128 hectares	South Cherwell Area & Woodstock	8 hectares
Carterton	6 hectares	Upper Heyford	13 hectares
Chipping Norton	5 hectares	Faringdon and Shrivenham	3 hectares
Didcot and Wallingford	190 hectares	Bayswater Brook	No strategic allocations
Wantage and Grove	6 hectares		
Witney	18 hectares		

Source: Oxford Infrastructure Strategy (OXIS) Stage 1 (2021-2040) – Technical Report

• **Housing and the Local Plans**

28. Table 4 shows the key housing distribution policies of the current Local Plans and the extent of planned housing provision (the numbers of houses). Table 5 shows housing completions achieved in the period between 2011/12 – 2019/20 in the Districts of Cherwell, South Oxfordshire, Vale of White

¹⁵ Oxfordshire Councils Growth Needs Assessment: Executive Summary, Phase 1 Report, Phase 2 Report, Covid Addendum, July 2021 (Iceni, JG Consulting and Cambridge Econometrics).

¹⁶ Oxfordshire’s Economic Recovery Plan: The ERP Action Plan, OxLEP, 2021

¹⁷ This finding should be included in the recommended review of the OGNA

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Horse and West Oxfordshire, and the Housing that still needs to be completed (to meet Local Plan allocations) between 2020 and 2031. Table 5 also shows Oxford City housing completions 2016/7 to 2019/20 and the housing numbers that need to be achieved between 2020 and 2036.

Table 4: Current Local Plan housing provision commitments and distribution strategies

District Local Plan	Housing provision	Distribution of housing
Cherwell Local Plan (Part 1) 2011-2031	27,240	<ul style="list-style-type: none"> • Prioritises growth in established towns and villages • Limits growth in rural areas • Focus of proposed growth in and around Bicester and Banbury
Cherwell Local Plan (Part 2) 2011-2031 Partial Review		<ul style="list-style-type: none"> • Prioritises apportioned growth in locations well connected to Oxford along the A44 and A4260 corridors in the south Cherwell area north from Oxford.
Oxford Local Plan 2016-2036	10,884 ¹⁸	<ul style="list-style-type: none"> • Focuses on housing growth with no new employment site allocations. • Focuses on intensifying development on previously developed land • Supports the role and function of Oxford's city centre, district centres and transport nodes as the most sustainable locations for new development
South Oxfordshire Local Plan 2011-2035	30,056 ¹⁹	<ul style="list-style-type: none"> • Allocation of a strong network of vibrant settlements building upon the existing settlement hierarchy. • Strategy focuses development in Didcot Garden Town as well as settlements at Culham, Chalgrove and Berinsfield Garden Village. • Apportioned growth predominantly at the Oxford City boundary including at Northfield, Bayswater Brook and south of Grenoble Road
Vale of White Horse Local Plan (Part 1) 2011-2031	22,760	<ul style="list-style-type: none"> • Reinforces service centre roles of the main settlements whilst promoting thriving villages and rural communities. • Majority of strategic growth allocated at the periphery of Wantage, west of Didcot and north of Abingdon-on-Thames • Growth also allocated within villages along the A420 corridor including at Faringdon, Kingston Bagpuize and Shrivenham.
Vale of White Horse Local Plan (Part 2) 2011-2031		<ul style="list-style-type: none"> • Allocates apportioned growth in Abingdon-on-Thames and Oxford Fringe Sub-Area (e.g., at Dalton Barracks and Shippon alongside the larger villages of East Hanney and Marcham)
West Oxfordshire Local Plan 2011-2031	15,950	<ul style="list-style-type: none"> • The strategy steers a significant proportion of future development into the Witney, Carterton and Chipping Norton Sub-Areas, with a particular focus on these three main service centres. • A strategic urban extension of Eynsham (e.g., a garden village alongside growth of Woodstock).
TOTAL	106,890	

Source: District and City Council Local Plans

Table 5: Local Plan housing commitment completions to date

District Local Plan	Housing completions 2011/12 – 2019/20	Housing to be completed 2020-2031
Cherwell District Council	8,332	18,908
South Oxfordshire District Council	7,196	22,860

¹⁸ Covers the planning period between 2016-2036

¹⁹ Covers the planning period between 2011-2035

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Vale of White Horse District Council	9,100	13,660
West Oxfordshire Local Plan 2031	4,400	11,550
	Housing completions 2016/7 - 2019/20	Housing to be completed 2020-2036
Oxford City Council	1,984	11,550
TOTALS		75,878

Source: OXIS Stage 1 and Oxford Civic Society calculations

29. It is noticeable that the housing provision in the Cherwell and Vale of White Horse Local Plans does not appear to be linked to the employment land provision in those Districts (212 ha and 194 ha respectively). If the employment land is taken up and assuming 'normal' occupancy rates, the mismatch between employment and housing provision could have commuting and housing affordability implications.

30. To achieve the housing provision specified in the Local Plans, the completion rates need to accelerate significantly between now and the end dates of each Local Plan period. The biggest challenge will be in South Oxfordshire which will need to increase the annual rate of completions by a factor of 2.6. West Oxfordshire also has a challenge needing to increase its annual completion rate by a factor of 2.15. For the other Local Plans, the factors are Cherwell 1.86, Vale of White Horse 1.23 and Oxford City Council 1.12²⁰.

31. If completion rates continue at the pace achieved from 2011 to now, an average rate of only 3,721 p.a. will be achieved. To complete the Local Plan housing provision in the Local Plans within the Local Plan planning periods an average completion rate of 6,645 pa will be required between now and the end of each Local Plan period²¹. This rate of completions is even less likely with recent high inflation rates increasing the cost of materials and house prices and the increase in mortgage lending rates, reducing demand / take up of new housing.

32. Clearly previous housing targets were over-ambitious and the underlying constraints to housing completions need to be fully understood in setting targets in the updated Local Plans and the Oxfordshire 2050 Plan. This issue is even more profound with increased mortgage rates and a rapidly cooling housing market. Deceleration of house building can be expected over the next few years at least, unless the supply of employment new opportunities continues to be strong. There is no discussion of this in the preferred options consultation, nor is there discussion that provision of affordable housing may become more contentious in this scenario.

The status of the Local Plans

33. As noted above, currently there are Local Plans for all District Councils and the City Council in Oxfordshire, as shown in Table 1. It is understood that the Local Plans are being updated and to extend their periods of effectivity to 2040. The Oxfordshire 2050 Plan was to have provided a strategic

²⁰ A review of the initial results of the 2021 census suggest that the Oxfordshire Growth Needs Assessment (OGNA) underestimates the 2018 base population in Oxford, Cherwell, South Oxfordshire and West Oxfordshire (by calculation of the average annual rate of population growth 2011-2021 and applying that rate of growth to 2011-2018). The overall discrepancy for the county as a whole is about 15,276 i.e., the OGNA underestimated population growth in the county to that extent.

²¹ Calculations by Oxford Civic Society based on statistics made available by the District and City Councils

planning framework for the Local Plans but preparation of this plan has been abandoned because of disagreements between the local planning authorities on the most appropriate rates, pace and location of growth.

34. To repeat - this means that the Local Plan updates will not be working with a common and agreed scale, pace and distribution of employment and housing growth across the County. Is it necessary to have such an agreement to be able to prepare the Oxford Local Plan 2040 update in such a way that it complements the Local Plan updates on neighbouring authorities?

4. Strategies and plans in preparation

4.1. The Oxfordshire 2050 Spatial Plan

- **The purpose and scope of the Plan**

35. As part of the Housing and Growth Deal²² agreement with government, all Oxfordshire's local authorities committed to producing a joint statutory spatial plan (JSSP)²³, known as the Oxfordshire Plan 2050²⁴. Once adopted, the Plan would have formed part of the Development Plan for Oxford City Council and each District Council in Oxfordshire. The document was to have been submitted to the Planning Inspectorate for independent examination before going in front of each council, which would have voted to adopt the Plan.

36. The Oxfordshire 2050 Plan was intended to set out the long-term, overarching and high-level spatial planning framework for Oxfordshire for the period to 2050. It was to have been used by the Districts and the City in the formulation of more detailed Local Plans and Neighbourhood Plans and, where appropriate, its policies would have carried weight in the determination of planning applications and appeals for development. It would also have provided a spatial framework for a wide range of other plans, strategies and programmes relevant to Oxfordshire that have a bearing on the use of land²⁵.

The spatial options and draft policies

37. The question here is – are there spatial options / draft Oxfordshire 2050 Plan policies that meet Oxford City council requirements and that could be agreeable to neighbouring local planning authorities?

- **Policy themes**

38. The Oxfordshire 2050 Plan was being prepared based around five key themes:

²² On 22 November 2017 the government announced that Oxfordshire would receive up to £215 million of new funding to support their ambition to plan for and support the delivery of 100,000 homes by 2031, alongside a commitment to adopt an Oxfordshire-wide statutory joint plan by 2021. <https://www.gov.uk/government/publications/oxfordshire-housing-deal>

²³ It is a formal Development Plan Document being prepared under Section 28 of the Planning and Compulsory Purchase Act 2004 (as amended).

²⁴ It is ironic that central government requires special arrangements to be made for this Plan, having dismantled the earlier planning system of County Structure Plans supported by regional development bodies. **Clearly strategic planning of this sort is required after all.**

²⁵ It was also intended that the Oxfordshire Plan would play an important role in helping shape the emerging Spatial Framework for the Oxford-Cambridge Arc, but as central government leadership of the Arc Strategy has faltered, the future of the Arc Strategy is uncertain. An assessment of the value of the Arc to Oxfordshire would be a useful component of the Oxfordshire 2050 Plan.

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- **Addressing climate change** This theme included policy options on sustainable design and construction, energy, water efficiency and flood risk. Collectively, these policies would have helped to reduce carbon emissions in Oxfordshire, encouraged a shift to sustainable energy, helped prepare for future weather events (flooding), and ensured an efficient use of energy and water.
- **Improving environmental quality** This theme included policy options that collectively aimed to protect and enhance Oxfordshire's natural, historic and built environments. Policy options in this theme included those relating to air quality, water quality, biodiversity net gain, nature recovery, natural capital, ecosystem services, and more.
- **Creating strong and healthy communities** This theme presented a range of policy options that would have helped to build communities that are strong, healthy and inclusive. Policy options in this area would have helped ensure that new development in Oxfordshire consider and support physical and mental wellbeing. Other policy options in this theme related to high quality design, health infrastructure, leisure, recreation, open sports and community facilities.
- **Planning** for sustainable travel and connectivity. This theme aimed to reduce carbon emissions from transport in Oxfordshire. It supported sustainable travel choices, including measures to encourage walking and cycling and the use of public transport. It sought to reduce the need to travel, especially by car. It also aimed to support the delivery of new strategic infrastructure and looked to ensure communities are digitally connected. Key policy options in this area included those on digital infrastructure, sustainable transport and freight management, strategic infrastructure, and a specific policy that focuses on a movement towards a transport network where no carbon emissions are produced in Oxfordshire.
- **Creating jobs and providing homes** This theme includes a variety of policy options that will help to provide a range of homes (including affordable homes) to meet Oxfordshire's needs, as well policy options that will provide better access to jobs and support Oxfordshire's economy. Policy options in this area include those on urban and town centre renewal, skills and education, affordable homes, specialist housing, as well as tourism, culture and arts, and more.

- **Spatial distribution of development**

Spatial Scenario Typologies, February 2019

- Scenario 1: Intensification of city, town and district centres
- Scenario 2: New settlements
- Scenario 3: Dispersal with development spread evenly across the county, including in smaller settlements
- Scenario 4: 'Wheel' settlement cluster with a focus on Oxford and the existing larger towns and key corridors into Oxford and between towns
- Scenario 5: Intensification around the edges of larger settlements and strategic extensions
- Scenario 6: Spokes and hubs with a continued focus on Oxford and key corridors into Oxford
- Scenario 7: 'String' settlement/ settlement cluster with development focused on a number of linked settlements.

39. These typologies were further refined following public consultation to inform the following set of eight potential alternatives for the spatial distribution of growth for consideration through the Sustainability Appraisal of the Oxfordshire Plan.

Spatial Alternatives, July 2020²⁶

1. Intensification in existing towns and cities: Increase density of existing and planned settlements, prioritise brownfield sites.
2. Intensification of housing development around strategic economic assets: Co-location of uses to meet business and research park needs.
3. Public transport 'Wheel' (transport-led): Concentrate development around areas of good public transport connectivity.

²⁶ Oxfordshire Plan 2050, Sustainability Appraisal – Alternatives, LUC in association with Levett-Therivel Sustainability Consultants, July 2020

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4. Rail 'String' (transport-led): Locate string of settlements along new/upgraded rail corridors (e.g., Cowley line).
5. OxCam 'String' (transport-led): New development along route of OxCam Expressway, once the route has been decided, consistent with NIC Growth Deal aspirations.
6. Strategic road junctions: Concentrate development around strategic road junctions.
7. Proportionate dispersed growth between existing settlements (needs-led): Oxford, towns and villages.
8. New settlements with new strategic transport connections.
9. Protect environmental assets (environment-led): Identify environmental constraints first (eg. strategic green and blue infrastructure, historic environment, flooding, AONB and other sensitive landscapes, best and most versatile agricultural land etc, possibly through natural capital mapping), then place housing and employment where they avoid significant impacts and enable enhancements.

40. Alternatives 5 and 6 which would focus development on roads (the Oxford-Cambridge expressway for Alternative 5 and existing road junctions for Alternative 6) were the least sustainable alternatives of the nine considered through the Sustainability Appraisal. The expressway was formally cancelled by Government in March 2021 after analysis showed that the proposed project would not be cost-effective, with any benefits outweighed by the costs.

41. Alternative 5 is no longer considered 'reasonable' and it has been discounted from further consideration. Alternative 6 was assessed as having significant negative effects across a range of SA objectives, including health, reliance on the car, climate change, pollution, soils and efficient use of land, biodiversity and geodiversity and landscape. This alternative is also not considered 'reasonable' and none of the spatial options put forward at this stage focuses development on roads.

42. Alternative 8 (new settlements with new strategic transport connections) was assessed as having a mix of positive and negative effects, depending on the scale of new settlements, their location and the type of strategic transport connections created. New settlements have not been taken forward as a separate strategic spatial option in the Plan; rather a new settlement (or settlements) is considered as a spatial typology that could potentially help deliver several of the strategic options set out in this document.

43. It was noted in the Oxfordshire 2050 reports that it was not the intention at earlier stages of Plan preparation to identify individual spatial strategy options that can necessarily accommodate all of Oxfordshire's growth over the next 30 years. Nor is any one of the options, taken in isolation, likely to form Oxfordshire's eventual long-term spatial strategy.

44. This view is applicable to the question being asked in this Oxford Local Plan 2040 consultation – is there a strategic spatial strategy (which will be comprised of components from more than one of the options) which effectively deliver the Oxford City councils Plan's priorities and the outcomes set out in the Strategic Vision for Oxfordshire and be agreeable to the neighbouring local planning authorities.

45. Criteria have been identified to evaluate the options and the intention has been to introduce criteria which are consistent with the Oxfordshire Vision:

- Guiding new development to the most sustainable locations.
- Using land effectively by planning positively for brownfield land and supporting urban regeneration.
- Protection and enhancement of Oxfordshire's highly valued countryside and landscape.
- Enhancement of the network of green spaces and blue infrastructure in urban and rural areas in ways that deliver social, economic and environmental benefits.
- Support for nature's recovery in ways that optimise the range of economic and social benefits that nature provides.
- Creation of places that build community resilience in terms of climate change, health of habitats and healthy place-shaping.

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- Maintenance of an effective Green Belt around Oxford and enhancement of its beneficial use in line with national policy.
- Planning for growth opportunities that will reduce inequalities and improve the health and wellbeing of the most disadvantaged.
- Strengthening the conditions that support our network for economic activity comprising innovation hubs and clusters and corridors based on science and technology and other key economic assets.
- Reducing the need to travel and improving connectivity, with new development located where there is existing or planned sustainable transport links (or the potential for such links based on new investment) and the potential for active travel.
- Planning for further development at existing settlements where this can be done sustainably.

46. Are existing Future Oxfordshire Partnership criteria useful to an evaluation of the draft Oxford Local Plan 2040?

Oxfordshire 2050 Plan stakeholder engagement

47. The Plan was being shaped by public and stakeholder engagement. An initial formal Regulation 18 Part 1 consultation 'Introducing the Oxfordshire Plan' took place in February / March 2019. That consultation sought views on what the Plan's vision, aspirations, objectives and broad spatial strategy should be. The public's response to that consultation is set out in the Regulation 18 Part 1 consultation report²⁷.

48. Taken together, the responses gave a very clear overall steer that there is an appetite for an approach that: is ambitious, radical, innovative and creative; is Oxfordshire-specific and reflective of local people's views; prioritises climate change, and focusses on social, economic and environmental wellbeing, and not solely on a narrow definition of growth.

49. The public participation in the preparation of the Oxfordshire 2050 Plan should be acknowledged by the Future Oxfordshire Partnership and its constituent local planning authorities. In preparing their updated Local plans, the local planning authorities should keep in mind the preferences made known in earlier public consultations.

4.2. The County Council Local Transport and Connectivity Plan

4.2.1. The purpose and scope of the Plan

50. Local Transport Plans are statutory documents, required under the Transport Act 2008. The current update of the Oxfordshire transport plan is called the Local Transport and Connectivity Plan (LTCP), to better reflect the strategy both for digital infrastructure and for connecting the whole county. The LTCP covers the time period to 2050 and is in two parts. Part 1 outlines the long-term vision for transport in the county and the policies required to deliver this. Part 2 (to be prepared over the coming year) considers the local application of these policies in the form of a series of area and corridor strategies.

51. At the national level there are a range of policies that provide context for the LTCP. At the sub-national and regional levels Oxfordshire County Council is also a part of regional bodies and partnerships which outline further aspirations for the region: These are set out in Annex 4 (available on request).

52. The LTCP needs to reflect changes to policy and funding and account for new priorities such as decarbonisation. The LTCP also represents an opportunity to adopt and implement a new way of

²⁷ <https://oxfordshireplan.org/wp-content/uploads/2019/06/Reg-18-Part-1-Consultation-Summary.pdf>

thinking which considers people first and seeks to create healthy places whilst improving biodiversity and air quality. The challenges identified are:

- **Decarbonisation** – Delivering a zero-carbon transport system is a critical part of contributing to UK targets and addressing climate change.
- **The private car** – A 36% increase in car vehicle miles since 1993 is having negative impacts on human health and the environment.
- **Future growth** – Proposals for many new jobs and homes in the county will have a significant impact on our transport network.
- **Connectivity** – There is a need to improve connectivity by all transport modes and also other forms of connectivity such as digital.
- **Wider challenges** – Transport is also critical to addressing wider challenges, notably public health, inequalities, air quality, and safety.

53. There are five key themes and associated ‘outcomes’

- **Environment:** Sustainable communities that are resilient to climate change, enhance the natural environment, improve biodiversity and are supported by our zero-carbon transport network.
 - **Health:** Improved health and wellbeing and reduced health inequalities enabled through active and healthy lifestyle and inclusive, safe and resilient communities.
 - **Place shaping:** Sustainable and resilient communities which provide healthy places for people and a high-quality environment capitalising upon the exceptional quality of life, vibrant economy and dynamic communities of our county.
 - **Productivity:** A world leading business base that is sustainable, has created new jobs, products and careers for all communities and is supported by an effective, zero-carbon transport network.
 - **Connectivity:** Communities are digitally connected, innovative technologies are supported and there is improved connectivity and mobility, across the county, enabling greater choice and seamless interchange between sustainable modes.
- **Draft policies**

54. A key policy is the establishment of a transport user hierarchy which sets the direction for the rest of the LTCP and clearly outlines the order in which different modes of transport will be considered in the policy development and scheme design process, viz:

- Walking (including running and mobility aids)
- Cycling and riding (bicycles, non-standard cycles, e-bikes, cargo bikes, e-scooters and horse riding)
- Public transport (bus, scheduled coaches and rail)
- Shared vehicles (taxis, car clubs and carpooling)
- Motorcycles
- Other motorised modes

55. The LTCP introduces a set of ‘headline targets’

- By 2030 the proposed target is to: replace or remove 1 out of every 4 current car trips in Oxfordshire
- By 2040 the proposed targets are to:
 - Deliver a zero-carbon transport network
 - Replace or remove 1 out of every 3 current car trips in Oxfordshire

56. By 2050 the proposed target is to: deliver a transport network that contributes to a climate positive future. Notably however these targets and the policies intended to deliver them are not

derived from any particular volume or distribution of employment and housing growth or projected increases in travel demand

- **Spatial Plans**

57. The draft LTCP part 1 (January 2022) sets out an 'Area Strategy Progress Review' in its Annex 5. Area strategies for Witney, Carterton, the A40 and A420 Corridors, Banbury, Bicester and Science Vale will be developed in part 2 of the Plan and a Central Oxfordshire Travel and Connectivity Strategy will replace the Oxford Transport Strategy. The Central Oxfordshire Travel Plan (COTP) is the first and will be ready for consultation in 2023.

- 4.2.2. **The Central Oxfordshire Travel Plan**

58. The COTP sets out a vision to develop a world-leading, innovative, inclusive and carbon neutral transport system with a focus on how people move quickly and safely around the area. The plan area covers the urban area of Oxford and the immediate movement and connectivity corridors to and from the city, as well as the main villages that lie on these corridors (Kidlington, Eynsham, Botley, Cumnor, Kennington and Wheatley).

59. In particular, the COTP aims to free up the limited road space in Central Oxfordshire to create a place where buses are fast, affordable and reliable, where people can walk and cycle, in pleasant and safe environments, and where high polluting, unnecessary, individual car journeys are reduced in number so that zero-emission buses, taxis and delivery vans are the norm, and that those who need to take essential journeys by car can do so without congestion.

60. A set of 22 actions intended to help achieve a sustainable and reliable transport system across the Central Oxfordshire area are recommended, including three major transport proposals for Oxford City: traffic filters, a workplace parking levy and zero emission zone. The three key projects are, and will be, subject to detailed and separate consultations, with the first, on traffic filters, open for public consultation until October 13, 2022 (Oxford Civic Society has responded separately to this consultation).

61. The COTP is strategic in the sense that it crosses the boundaries of the Oxford City Council, Cherwell District Council, West Oxfordshire District Council, Vale of White Horse District Council and South Oxfordshire District Council.

62. The timing of the Central Oxfordshire Travel Plan consultation appears not to be synchronized with the updating (to 2040) of the Local Plans of these District Councils and the Oxford City Council.

63. In addition, it appears not to be cognizant of the differences of opinion about employment and housing growth rates and distribution of growth in these Districts and the City, and the consequent abandonment of the preparation of the Oxfordshire 2050 Plan.

64. Exactly as was said in the OCS report published just before the Oxfordshire 2050 Plan abandonment, the links between the Local Transport and Connectivity Plan (and now Oxfordshire Travel Plans), the Local Industrial Strategy and the Oxfordshire Infrastructure Strategy need to be carefully considered. Optimisation of strategic infrastructure (including transport infrastructure) investment could be the major casualty of the abandonment of the Plan – care needs to be taken that the damage is limited.

65. OCS asks the following questions:

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- How can the Oxford Local Plan 2040 be prepared without an assessment of likely transport policies and their implementation. Development plans and transport plans must be integrated²⁸.
- Should the preparation of COTP measures be synchronized, coordinated or, even better, integrated into the development planning of the District and City Local Plan updates? Would achievement of the COTP targets perhaps be made simpler with such integration?
- Most importantly, should all the area travel plans be prepared in a synchronized way with the District and City Council Local Plan updating, and with the consequent benefit of ensuring strategic (cross District / City boundary) transport infrastructure planning. Currently the 19 area travel plans are being developed sequentially, whilst the five Local Plans are being progressed broadly in parallel.
- The environmental and social implications of the COTP will still need to be exhaustively considered and respected and could use some of the agreed principles and guidelines established for the now abandoned Oxfordshire 2050 Plan.
- The area plan might be better described as a 'strategy' – a grouping of types of action intended to contribute to the overall targets but without (in most cases) giving details of what is likely to be implemented where and when. (This depends on further work developing and prioritising individual schemes in the context of funding and delivery opportunities).
- Perhaps surprisingly whilst the location of strategic sites to be developed during the current plan period is identified, the associated planned transport improvements are not, even though these are likely to be the focal points of local change.
- Baseline and forecasting data – the COTP reiterates the LTCP5 overall targets in respect of reducing car trips, zero carbon emissions and 'vision zero' accidents. However, it does not establish what the 'baseline' conditions are for these or other attributes in the Central Oxfordshire area, the projected change during the plan period (to 2040), or the likely impact proposals put forward in the plan would have (i.e., their potential effectiveness).
- We are very disappointed by this absence of a strategic level piece of work to document the baseline and impact of forecast changes from interventions proposed in the Central Oxfordshire Travel Plan. If the baseline is not stated and the value of the interventions in aggregate is not forecast, how can the Cabinet know that they will be sufficient to meet their high-level objectives? This is just wrong.
- Furthermore, it is hard to see how consultees can be convinced of the value of the proposed interventions, let alone reasonably comment on the draft Central Oxfordshire Travel Plan, without some quantification of the base position and the impact of proposed changes. Unlike the traffic filters the possibility of introducing the demand management schemes collectively on an experimental basis is not available. The combined effect and interaction of the three demand management schemes (WPL and ZEZ in addition to the traffic filters) is particularly

²⁸ The draft COTP does not even address the transport implications of the Local Plans already adopted!

significant. To us it appears that, in view of the scale of the ambition of the plan, a commensurate level of transport modelling should be carried out and evidence published.

- In line with the cessation of work on Oxfordshire Plan 2050 no reference is made to possible or desirable improvements beyond the immediate Local Plan period. Also, no reference is made to the future of the A34 (the responsibility of National Highways) which is to be the subject of a separate Corridor Plan.

4.2.3. Demand management in the City of Oxford

66. To complement the overarching LTCP targets, COTP puts forward a number of descriptive 'outcomes' which are in the nature of aspirations (e.g., 'congestion-free roads for essential journeys').

66. To deliver these, the plan proposes 22 actions which represent the application of LTCP policies. Actions 1-3 comprise the three strategic demand management measures proposed for Oxford City (ZEZ, traffic filters and WPL). Additional actions include reviews of public parking, the promotion of active travel and public transport (including via mobility hubs), liveable streets and publicly accessible EV charging.

67. OCS disagrees with the last: (1) provision of publicly accessible EV charging is likely to consume more valuable road space, and for long times unless more expensive rapid charge facilities are provided; (2) it will encourage one-for-one replacement of non-EV's by EV's, which only starts to be green if you are driving something like 10,000 miles/year, due to the embedded carbon. The intention is to reduce car use.

68. The extent of potential vehicle displacement and enforced use of the Ring Road for many journeys internal to the city is generating considerable public opposition to the filter scheme. The consequent additional mileage and increases in congestion and pollution risk negating many of the 'savings' otherwise achieved through the suppression or shift to sustainable modes of a proportion of existing trips.

69. Additional concerns relate to the absence of quantitative, rather than anecdotal, data on the "tidal" nature of congestion in Oxford City, reflecting commuting and school runs, as well as retail - linked journeys, particularly at weekends. Forecasting of modal switch to bus travel will also be affected by changes to bus pricing and routeing. No 'carrot' schemes have been suggested to balance the 'sticks' – again a Rapid Transit system would offer an attractive alternative on and near main routes, and could be partly paid for by contributions by the many developments currently planned or taking place in and around the city that do not appear to offer much in the way of traffic reduction.

70. In an ideal world a longer planning timescale would have allowed investigation of other options such as a congestion charging scheme within the Ring Road which would have achieved the desired reduction in overall traffic levels without the adverse effects of journey displacement. Is it too late to consider this?

71. Do all major transport issues need to be discussed in the draft Oxford Local Plan 2040, with policy options for consideration by the County Council? Development plans and transport plans must be integrated.

4.2.4. Climate change and Local Transport and Connectivity Plan

72. Decarbonisation is a key overriding challenge that the LTCP seeks to address. Decarbonising transport is a critical part of reaching net-zero emissions and addressing climate change. In order to set out how this will be achieved, the government published the Transport Decarbonisation Plan in July 2021.

73. The Transport Decarbonisation Plan reiterates commitments to end the sale of new petrol and diesel cars by 2030 and proposes ending the sale of non-zero emission HGVs by 2040. It also highlights the need to make better use of road space and encourage more trips by walking, cycling and public transport. The document sets out a role for LTPs by suggesting that for future local transport funding they will need to demonstrate how local areas will reduce emissions through a portfolio of transport investments.

74. The LTCP builds on these recommendations and will be consistent with the Oxfordshire *Leading the Way Scenario*. This scenario is driven by high levels of public support for local action and strong policy, as well as lifestyle change amongst householders and communities. In terms of transport the following key features are identified:

- Energy demand associated with transport falls as Oxfordshire residents incorporate walking and cycling into their daily routines.
- More amenities are provided locally, and businesses support remote working.
- Reduced car-usage is also driven by extensive pedestrianisation measures, workplace charging levies, the proliferation of low traffic and higher density neighbourhoods, and the expansion of shared transport options.
- Vehicle electrification occurs more rapidly than in other scenarios, and sharing business models, are pioneered in Oxfordshire.
- Freight consolidation centres and other localised warehousing and production enable low carbon local delivery of goods throughout urban areas.
- Recognising the need for rapid reductions in greenhouse gases in this decade, the LTCP aims for a zero-carbon Oxfordshire transport system by 2040. It recognises that achieving this target will be challenging, requiring technical innovation, bold policy decisions and widespread behaviour change. However, the benefits are significant. Delivering this target will ensure that Oxfordshire plays its part in tackling climate change. By leading the way, we will help others to get there quicker and will create opportunities for Oxfordshire based enterprises. Decarbonisation will also deliver wider benefits to biodiversity and people's health and wellbeing in Oxfordshire.

75. Are County Council Local Transport and Connectivity Plan criteria useful to an evaluation of the draft Oxford Local Plan 2040?

76. The approach to decarbonisation is primarily by seeking to reduce unnecessary private vehicle use and increasing the proportion of trips made by walking, cycling, public and shared transport. Policies are outlined to support the uptake of zero-emission vehicles, encourage home working and support alternative modes for the movement of goods. However, it is also acknowledged that there may be situations in some parts of the county where management measures may be needed in order actively to discourage car use.

4.3. Oxfordshire Infrastructure Strategy (Stage 1 and Stage 2)

4.3.1. Purpose and scope of the strategy

77. The Oxfordshire Infrastructure Strategy (OxIS) is a Future Oxfordshire Partnership-commissioned project involving the county's six local authorities and OxLEP, with the purpose of prioritising infrastructure requirements to 2040 and subsequently, in Stage 2, to 2050.

78. Stage 1 of the Oxfordshire Infrastructure Strategy (OxIS) provides a long-term framework for Oxfordshire to identify the priorities for investing in strategic infrastructure, such as transport, utilities, healthcare provision, as well as identifying potential delivery and funding opportunities. It has been

undertaken in partnership with Oxfordshire County Council (OCC), Oxfordshire's five District Councils and other key partners and the scope has been endorsed by the Future Oxfordshire Partnership.

79. OxIS is focused specifically on strategic infrastructure and is designed to support local plans but not replicate them. OxIS only considers schemes that can be delivered through capital funding and also discounts schemes that are already delivered, currently under construction or at an advanced stage of delivery planning (e.g., with full funding identified). Schemes already established in adopted Local Plans as an intrinsic requirement for the delivery of development sites by developers through the planning process (e.g., biodiversity net gain, highway mitigation, internal community centres) have also been discounted. OxIS aims to:

- Set out the priority strategic infrastructure investment needed to support sustainable, clean, healthy and inclusive growth in Oxfordshire, reflective of the ambition to build a global business innovation ecosystem and aligned to the five OxIS Themes
- Continue to shape and influence investment strategies at a national, sub-national and local level; maximising the efficiency and effectiveness of existing infrastructure and reducing the demand for new infrastructure, supporting Oxfordshire's role as a global innovation hub
- Plan for infrastructure over a longer-term horizon to complement and provide evidence to support the emerging Oxfordshire Plan 2050
- Provide an investment prioritisation that can be applied as relevant funding sources become available.

80. Do strategic infrastructure issues need to be discussed in the draft Oxford Local Plan 2040, with policy options for consideration by the County Council and other stakeholders?

- **OxIS draft themes and policies**

81. The Strategy includes five OxIS Themes. These themes are consistent with established and emerging policies across Oxfordshire, including Oxfordshire's Strategic Vision for Long Term Sustainable Development (2021) and the current draft Local Transport and Connectivity Plan. The purpose of the five OxIS Themes is to provide a structural framework for the identification of future infrastructure needs to 2040 to support sustainable, clean, healthy and inclusive growth in Oxfordshire.

4.3.2. Oxfordshire Infrastructure Strategy – Focus Areas

82. Focus Areas have been introduced to replace the corridor-based approach of the earlier OxIS-17. This enables a greater consideration of schemes which may be lower in cost but remain strategically important to the creation of successful places. The OxIS place based local focus areas have been split into two categories (please refer to Figure 1):

- OxIS Towns and Surrounds: Established urban areas comprising Oxford City and key towns where notable levels of change are forecast to 2040
- OxIS Rural Communities: Rural communities across Oxfordshire constituting both villages and urban-rural fringes where notable levels of change are forecast to 2040

4.3.3. Strategic 2040 Infrastructure Needs

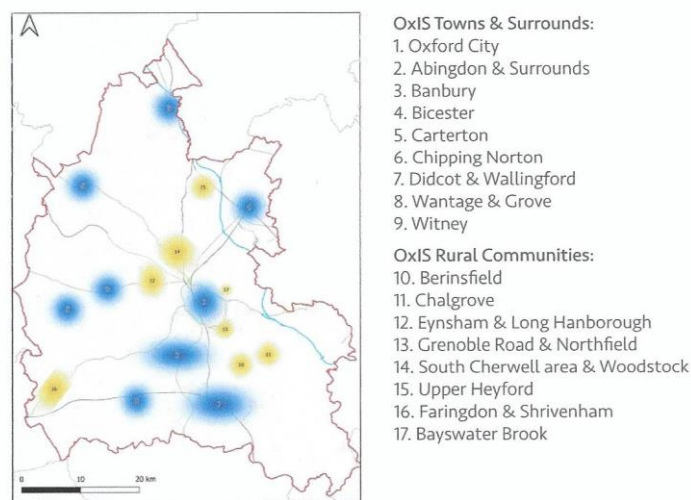
83. The themes have been used as a framework to refine 25 outcome-led Sub-Themes. These Subthemes represent Oxfordshire's future needs for infrastructure investment to 2040 and underpin the needs-based appraisal component of the infrastructure scheme multi-criteria appraisal.

84. The outcome of the sifting and filtering process resulted in the identification of 259 OxIS strategic infrastructure schemes qualifying to appraisal. Over half these schemes fall into the transport

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infrastructure type. Schemes across the remaining twelve categories are generally evenly distributed; except for Digital (IF5) where no schemes have been identified; due to the commercial nature in which digital infrastructure is delivered.

Figure 1: Oxfordshire Infrastructure Strategy – Focus Areas



Source: Oxfordshire Infrastructure Strategy

85. The OxIS Stage 1 scheme list has some outstanding gaps associated with infrastructure that is the responsibility of key external infrastructure providers and utility providers including commercial digital infrastructure companies as well as the Environment Agency, Thames Water and SSEN.

86. Extensive engagement with these stakeholders has been undertaken through the Stage 1 process, however, limited information has been provided on schemes that remain reliant on funding; some of which is a result of commercial sensitivities. This means that there is presently a lack of some of these related schemes considered within OxIS Stage

87. A key finding of this work is that the identified OxIS schemes do not fully address Oxfordshire's needs to 2040.²⁹ These gaps are amplified by the challenge in engagement with infrastructure providers as well as policy and societal changes since Infrastructure Development Plans were prepared.

88. Many of Oxfordshire's plans and wider policy and strategy documents pre-date the declaration of a climate emergency in 2019 and the subsequent county-wide and district Climate Action Frameworks produced in 2020 and 2021. This recent shift in priorities means there is a substantial absence of schemes currently identified which specifically aim to reduce carbon emissions across the county, further highlighting the need for this updated and needs-based OxIS.

89. Key infrastructure provision gaps to 2040 include:

- **There are significant shortcomings in the existing digital infrastructure, particularly in urban areas. This has been amplified by the recent spike in home working and shopping, as well as significant global uptake in digital technology.** Non-Commercial Full Fibre Broadband Schemes: Oxfordshire currently only has 16.5% of its county covered by full-fibre broadband, behind

²⁹ See Chapter 5 of the OxIS Stage 1 Technical Report.

proportional figures for the region and the nation. The commercial sensitivity of the private sector means that the identification of future schemes which are not commercially viable is not yet possible.

- **Digital Upgrade of Public Assets:** The onset of 5G and the Internet of Things means there is an opportunity for further schemes to be identified (e.g., digitalisation of street furniture).
- **Electricity Supply Grid Capacity Schemes:** **There is currently an absence of tangible strategic schemes identified by Oxfordshire’s Distribution Network Operators (DNOs) to address the combined challenge of additional grid demand placed by future housing growth in the county alongside increasing electric vehicle charging infrastructure.**
- **Wastewater Schemes:** There is a lack of strategic schemes currently identified to ensure that the need for sufficient wastewater processing capacity across Oxfordshire continues to be met in the context of future population growth. Partnership working with Thames Water is required to identify any forthcoming schemes. Wastewater schemes that are fully funded by Thames Water are excluded from scheme appraisal.
- **Bus Priority Schemes:** **Quality bus services have an important role in providing regional sustainable connectivity, as well as achieving net zero transport emissions³⁰, socially integrating places, driving economic growth, reducing socio-economic inequalities, improving access to health service and spaces for physical activity and providing inclusive access to education.**
- **Rapid Transit Schemes:** **Similar to bus priority, rapid transit schemes in the form of quality bus, tram or rail services are internationally recognised to provide multiple benefits to address key OxIS Needs.**

90. OxIS has developed an approach to multi-criteria evaluation of project proposals to prioritise projects. It is recommended that the criteria are assessed for consistency with recent national and local policy initiatives.³¹

- **The Status of the OxIS**

91. The report will be followed by the OxIS Stage 2 Report in 2022 that will consider new proposals for strategic infrastructure required to meet Oxfordshire’s needs in the period to 2050. The OxIS Stage 2 Report was to have been aligned with the Oxfordshire Plan 2050, and will now need to be aligned with Local Plans of the local planning authorities.

4.4. Other strategies and plans

92. The diagram shows some of the plans and strategies and how they fit together, at least diagrammatically. The strategies and plans described in this booklet

- **OxLEP Economic Recovery Plan³²** - It provides a comprehensive and co-ordinated County-level economic route map for recovery from the COVID-19 pandemic, and the damage impacted on Oxfordshire’s People, Places and Businesses. It has a near-term timeframe covering a period of 24 months, running from

³⁰ The National Infrastructure Commission Report (2020) identifies a critical need for future infrastructure schemes to reduce carbon emissions both from energy and transport sources (approximately 82% of Oxfordshire’s carbon emissions).

³¹ The needs-based appraisal is grouped by the five OxIS Themes and assigned a score across each of 25 needs identified and assessed. Each scheme is assigned a score on a seven-point scale to determine its relative ability to fulfil Oxfordshire’s future needs to 2040. This scale incorporates both positive and negative scoring ranging from -3 to +3 to reflect that some schemes can both contribute and detract from these needs; for example, in relation to socio economic inequalities (P2) and carbon emissions (E1). Each of the needs are scored against outcome led measurable datasets to identify what the County requires for infrastructure to support planned growth.

³² Oxfordshire’s Economic Recovery Plan: The ERP Action Plan, OxLEP 2021

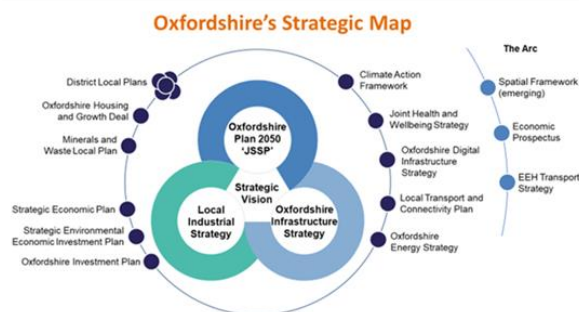
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Spring 2021 through to Spring 2023. It provides a flexible framework for Oxfordshire partners to co-ordinate and target interventions and measures to support recovery at the most effective level, where it is most needed – be it County-wide, at district level or in specific wards. The Plan is complementary to existing investment plans, most notably the Oxfordshire Local Industrial Strategy and The Oxfordshire Investment Plan. It also acts as a basis for future proposals to Government under the UK Shared Prosperity Fund, the Levelling-Up Fund, innovation investment through the UK R&D Roadmap and funding in support of connectivity projects via DfT and DCMS. It is noted that it forecasts that Oxfordshire could have around 6,000 fewer jobs by 2031 (relative to a pre-pandemic trajectory), it identifies that there is likely to be continued strong demand for the Research and Development floorspace property market.

- **Oxfordshire Rail Corridor Study** – the study assesses the impact of planned growth in jobs and housing on Oxfordshire’s rail system and identifies the role that rail can play to support the delivery of that growth. It reflects and aligns with both the Housing and Growth Deal and the Oxfordshire Local Industrial Strategy.
- **Oxfordshire Digital Strategy** - sets out the framework for delivering full-fibre broadband and mobile provision across Oxfordshire. It builds on the extensive work that the Digital Infrastructure Programme has done with suppliers, partners, and government to get superfast broadband access to over 97% of premises in Oxfordshire.
- **Oxfordshire Energy Strategy**³³ - will demonstrate to the UK how we can consume energy more efficiently and harness it for future generations. The strategy can also provide the building blocks for a stand-out, low-carbon sector. It already makes a significant contribution to Oxfordshire’s economy, generating £1.15bn a year (seven per cent of Oxfordshire’s GVA). The Oxfordshire Energy Strategy can help to spearhead a further £1.35bn annually to the local economy, creating over 11,000 new jobs by 2030. In doing so, it would also mean the county will deliver emissions reduction targets in-line with local and national expectations, meaning the strategy will play a key part in addressing climate change too. It is a key strategic influencer on the Oxfordshire Plan and sets objectives (see Section 2.2.2, Climate change).
- **Joint Health & Wellbeing Strategy** - the priorities can be summarised as: Agreeing a coordinated approach to prevention and “healthy place-shaping”; Improving the resident’s journey through the health and social care system (as set out in the Care Quality Commission action plan); Agreeing an approach to working with the public so as to re-shape and transform services locality by locality; Agreeing plans to tackle critical workforce shortages.

In addition to these priorities for the Board we will be developing our work together on a wide range of issues that affect different groups in the population. These are set out in the body of the strategy using an approach which covers all ages and stages of life– ensuring A Good Start in Life, enabling adults to continue Living Well and paving the way for Ageing Well. Many factors underpin our good health and we will work together to address these too under the heading Tackling Wider Issues That Determine Health.

Figure 2: Diagrammatic summary of current plans and strategies



Source: Future Oxfordshire Partnership

³³ <https://www.oxfordshirelep.com/energystrategy>

5. How can the Oxford Local Plan 2040 respond to the strategic context

93. There are three ‘elephants in the room’ – the big issues which the Draft Oxford Local Plan 2040 needs to deal with – the rate and pace of employment and housing growth in Oxfordshire and the role of the city, climate change and development funding. To deal with them properly the preparation of the Oxford Local Plan 2040 needs to work effectively with neighbouring local planning authorities and other agencies. Currently this is required to be through a Duty to Cooperate.

94. The Duty to cooperate scoping statement seeks to identify the issues which the Oxford Local Plan 2040 will need to address that are likely to be strategic matters and which therefore fall under the duty to co-operate. It also seeks to identify those bodies with which co-operation may be necessary. This is a draft Scoping Strategy for consultation with key stakeholders - stakeholders are the bodies identified as being key duty to co-operate partners.

95. The Duty to Cooperate strategic matters that may apply to the Oxford Local Plan 2040 have been identified as follows:

5.1. Rate and pace and Location of employment and housing growth

96. Housing needed in the area - housing needs and provision is one of the top issues that the Local Plan must address, and where the duty to co-operate is essential. The NPPF states that authorities must work to address housing needs within their housing market area. It also expects authorities to co-operate on meeting one another’s housing needs if it cannot be accommodated within the authority where it arises.

97. Consistent with this guidance, the City Council was working jointly with neighbouring authorities to produce the Oxfordshire Plan 2050. But no more. Part of the evidence base for this plan included the Oxfordshire Growth Needs Assessment, which set out scenarios for housing and employment growth. The local planning authorities have noted that they will continue to work together to support this process to assign housing requirements across the county according to an agreed spatial strategy. This is a huge commitment and it is not at all clear how it can be achieved through the Duty to Cooperate (when it was not achievable with the central government grant condition of a Joint Spatial Plan being prepared).

98. Employment - another issue for the Local Plan will be economic growth, ensuring that the city can continue to play its role in the local and national economy. The City Council is a board member of the Oxfordshire Local Enterprise Partnership (OxLEP) which has developed the Oxfordshire Local Industrial Strategy (LIS) in partnership with the business community, academic institutions and the other Oxfordshire Local Authorities. It has also signed a City Deal in 2014 with partners and the government to bring around £55.5 million of government funding (over £1.2 billion including private finance) that can be used locally to boost innovation and business growth, create jobs and help secure Oxfordshire’s place as a world leader in technology, knowledge and expertise.

99. Close working with the other Oxfordshire authorities and the LEP will be required in this area. However, Oxford’s reach as a location to work goes beyond the Oxfordshire authorities, and will therefore require co-operation with a wide range of other local authorities, and other bodies. Provision of retail, leisure and other commercial development Oxford city centre plays an important sub-regional role and co-operation with neighbouring authorities is essential as current and future

populations will not shop exclusively in their own areas, but will travel to others. An update of the retail and leisure study is likely to be commissioned to understand likely need in the plan period.

- Provision of infrastructure for transport - strategic transport infrastructure requires cross boundary co-operation. Oxfordshire County Council is the highways authority who is responsible for producing the Local Transport Plan. Neighbouring authorities also have an important role to play in these matters.
- Highways England is responsible for the strategic road network including the vital A34 and so close co-operation with them is also key. Oxford has an important location on the rail network and there are significant improvement works taking place and planned in the area and so the Office of Rail and Road will need to be engaged with in this regard. Previously the Civil Aviation Authority has expressed that it is unlikely to get involved in planning in Oxford.
- Provision of utilities infrastructure (including telecommunications, waste, water and energy) - a range of Duty to Co-operate bodies including the County Council, neighbouring authorities and the Environment Agency will need to be involved in framing the policies and proposals of the Local Plan in this regard. In addition, other bodies (outside of the duty to co-operate) including Thames Water and energy and telecoms providers will need to be involved.
- Flood risk and mitigation of climate change effects - large parts of the city of Oxford are at risk of flooding so careful attention will need to be paid to this when drafting policies and proposals of the Local Plan. The Environment Agency will be a key Duty to Co-operate body. Oxfordshire County Council (as lead drainage authority) and Thames Water (although not a Duty to Co-operate body) will also have important roles to play. There are plans for a major flood alleviation scheme in the Oxford (Oxford Flood Alleviation Scheme) area and so neighbouring authorities will need to be aligned with this.
- Provision of health infrastructure and local facilities Oxford is a regionally (and nationally) important location for health and medical research. Its hospitals serve a very wide catchment area. At local level Oxfordshire County Council has responsibility for public health and so will be important in helping frame the policies of the Local Plan. This topic is clearly where the two-health related Duty to Co-operate bodies: NHS Oxfordshire Clinical Commissioning Group and NHS England will have important roles to play.
- Provision of security, community and cultural infrastructure and other local facilities Neighbouring authorities, Oxfordshire County Council and the Homes and Communities Agency may want to be involved in helping to frame the policies and proposals of the Local Plan in this field. Other bodies (outside of the Duty to Co-operate) including Thames Valley Police will also want to be involved.

5.2. Climate change mitigation and adaptation

- **Climate change mitigation and adaptation** - managing flood risk (discussed above) will be a key element of Oxford's climate change mitigation plans, involving the Environment Agency, Oxfordshire County Council and neighbouring authorities. Carbon reduction and associated emissions and air quality issues will also play a part in preparing the city for changes associated with climate change.
- Oxford has a Special Area of Conservation at Oxford Meadows, this a European level protection and as such Natural England will be key to inputting into and assessing policies and proposals that may have an impact on that site. The Local Nature Partnership (when established) will also have a role to play in the wider natural environment topic.
- Conservation and enhancement of the natural and historic environment, including landscape Oxford has a wealth of historic buildings and valuable landscapes that need careful consideration

in the Local Plan. Historic England will have a key role to play in terms of the built heritage and also the views into and through the city and the famous spires.

5.3. Development funding

100. It would be helpful to have funding options included in the assessment of preferred options. Sources of funds and the likelihood of funding being available (particularly in the medium term, with public spending cuts expected).

Appendix 2 - The Preferred Options

1. General comments

101. The City Council have prepared an Options Document informed by last year's planning consultation asking citizens to identify ISSUES of concern. We are told that these have informed the range of topics in this document (230 pages in eight chapters) from Vision; Housing; Economy; Climate Change; A Carbon Free City; Heritage and Design; Equality; Sites and Infrastructure. The nature and intention of the document is to be welcomed. It is inclusive and wide ranging from housing to heritage, from gypsies to boat dwellers, from bikes to bins. Unfortunately, it must be overwhelming for the majority of people who are being asked to make a reasoned contribution to the future of their city.

1.1. Neighbourhood plans

102. The argument for development in established District Centres such as Headington, Rosehill, Summertown is well made but the failure to acknowledge Neighbourhood Plans made by local people throughout the city with an understanding of the needs and characteristics of their area is disappointing. For example, it is well known that the doctors' surgeries serving the northern part of the city and beyond are no longer fit for purpose and Diamond Place in Summertown has been identified as the "*ideal location for a new Health Centre*". Sites and buildings in Banbury Road and South Parade, such as Parma House, will be looking for new life and could make good places for Small Businesses and Affordable Housing. Other points are made under Sites in Chapter 8.

1.2. Healthy city

103. The Oxford City Council is placing a strong emphasis on what is called "the 15-minute city". Roughly speaking that is one where people can reach a range of facilities within a 15-minute walk (about a mile) of their house, (this must be assuming a reasonable level of fitness) which it is believed will build a healthy vibrant local community. The document fails to include the work of Transport Groups to show how this relates to getting about more widely throughout the city, how *essential* workers will commute on a clean rapid transport system and how citizens will be able to move about in a safe, well maintained public realm.

1.3. Development - housing

104. Local Plans are intended to identify what development is needed, where it should be located, what makes the place special and to identify what improvements are needed to make Oxford an enduring place. There should be a focus on the placement of new student accommodation, ensuring that its location does not occupy sites which should be used for affordable housing. A greater provision of student housing by the two universities has the potential to release existing HMO properties for families and workers. The future population of Oxford is likely to increase considerably if all the proposed innovation centres are built. By default, many of the new workers are likely to be transient (very much like the student population) because of fixed-term research contracts.

105. Unfortunately, the withdrawal of the Oxfordshire Plan 2050 has dealt a blow to an integrated approach to county wide planning and to the progress of the Local Plan. The Oxfordshire planning authorities have been unable to agree on planning for future housing which will now be addressed through individual Local Plans for each of the city and districts. Housing numbers are not now clear. And the city council are obliged to carry out evidence-based research with complex methodologies of calculation (estimated to be next year) which would have been provided by the County.

106. The Council has made the case that Oxford, due to its special role in the local and regional economy, need not comply with the NPPF guidance on calculating housing need but that it does need to demonstrate how its need will be achieved elsewhere. Surely the actual situation is that new housing numbers which can be planned for within Oxford are determined by capacity – the availability of sites (not Oxford’s “special role in the local and regional economy”).

107. The available figures suggest that some 9k new dwellings can be accommodated in the city. This leaves a requirement of 15k which the neighbouring Districts have allowed for in their current Local Plans, but will they do so in their emerging Plans, given their failure to reach agreement on housing numbers within the Future Oxford Partnership? Whilst the existing breakdown of requirements on new development is given in H3, Affordable Housing, the document fails to show where the new housing will be located on the Development Sites - Ch. 8

108. Population figures are not discussed, neither is the location of commerce, business and enterprise under the wider issue of “levelling up and inequality”.

1.4. Climate change

109. The Plan will require buildings and their construction to be built with a zero-carbon outcome³⁴ and will introduce measures to make the city resilient to climate change and a more equitable place. The Plan will be used to determine Planning Applications which will need to show, amongst other things, how housing developments will have a mix of tenures and where appropriate, include employment, how development responds to climate change, adaptability, context, biodiversity, etc.

110. **Whilst these aims are welcome one wonders whether, given the council’s stated “Climate Emergency”, Climate Change should be given higher priority in planning and design. Furthermore, the document fails to give convincing arguments for the use of the widely acclaimed Design Codes which together with the source of knowledge available in local neighbourhoods could bring together the aspirations of the citizens of Oxford and deliver a responsive built environment.**

2. Preferred options

2.1. CH 1 Visions and Strategy

- **Set 1 Directing development to the right locations.**

Agreed option a) new development

- **Set 2 Approach to Green field sites**

OCS preference is for the Preferred Option. The Alternative Option is too restrictive: not all Greenfield sites, by a long chalk, are worthy of protection: their benefits, if any, need to be balanced

³⁴ Our understanding is that West Oxfordshire District Council tried to write this into policy in the AAP for Eynsham garden village but it was ruled non-compliant with national policy by the Planning Inspector, hence inadmissible.

against the benefits from carefully considered development on the less worthy or worthless sites.

- **Set 3 Infrastructure considerations in new development.**

Agree generally – please note that Oxford Civic Society launched a campaign for the introduction of Land Value Capture earlier this year, the funds from scheme if adopted could contribute to the provision of infrastructure. “LVC, if adopted, could provide a new and significant source of funding for infrastructure without making any reduction in the sums previously allocated by governments to non-infrastructure uses.

- **Set 4 Viability considerations.**

Agree generally - “Affordability” needs redefining. Affordable housing is a priority for the future economy of Oxford. “Viability” arguments are frequently used by developers often relying on excessive sums having been paid to obtain the use of the site in the first place. The requirement to provide necessary infrastructure for a site should be mandatory upon the applicant. We also note that the NPPF seems to support viability assessments based on land values set by precedent, rather than residual valuation after planning policies have been complied with.

- **Set 5 Presumption in favour of sustainable development.**

Agreed - providing development plans are strongly monitored. Has the council the staff to do so?

Agree that “the right development is needed for the right place” and that climate change should have priority in development and construction.

The policies for a well-integrated city are welcome but is there funding and will for action?

Public concern over Oxford’s public transport suggests that, in contradiction to the statement in the document, it is not “strong”.

A long history of concern about the supply of public housing and its integration with employment suggest it has not been well co-ordinated.

2.2. CH 2 Housing and Inclusivity

- **Set H1 Housing requirement for the plan period**

- **Set H2 Housing need for the plan period**

In the Oxford Local Plan housing need is incidental since the provision is fixed by the availability of sites. Calculating the need or the requirement only affects the numbers of homes which adjacent LPAs have to provide under the Duty to Cooperate.

The lack of enthusiasm of neighbouring local planning authorities for accommodation Oxford’s unmet need could be a spur to considering residential densities in the city and the potential for incrementally increasing densities. Densities increased around sub-centres or transport hubs could be beneficial in many ways. This is not an argument for tower blocks – but more mid-rise buildings gradually being introduced as opportunities arise.

- **Set H3 Affordable homes, overall requirement**

Policies to retain affordable housing as currently calculated are preferred.

- **Set H4 Affordable housing financial contributions for new student accommodation sites/campus and other non-self-contained or specialist housing.**

Agreed - Prefer option (A) in student housing for financial contribution toward affordable housing for 25 or more rooms or 10 self-contained units.

The provision of affordable housing is surely to create neighbourhood communities. Locating affordable housing alongside student accommodation is not a satisfactory solution. However, developers should provide a financial contribution for affordable housing whether or not their proposed site is in an area of the city where local workers would choose to live if they could afford the housing.

For an example there are the speculative developments on Between Towns Road and the Brookes development on Cowley Road. This area of the city accommodates a large percentage of local workers and affordable housing should be provided. Otherwise, occupants are required to move further out of the city and are likely to use private transport to get to work. This goes against Council policy to reduce the movement of private vehicles.

- **Set H5 Employer linked affordable housing.**

Agreed - Prefer option A to encourage employers to think about affordable housing on identified sites. Given the anticipated growth of innovation centres/hubs, the growth of short-term research employment in the city would enable a more mobile workforce.

- **Set H6 Mix of housing sizes.**

Agreed - Favour option B. Not all developments need to be large and smaller developments would fit nicely into the available brown field sites within the city boundaries.

- **Set H7 Loss of family dwellings.**

Agreed - Prefer option A to resist loss of family dwellings. If student accommodation is to be expanded theoretically this releases dwelling which are licensed HMOs. this would add to the stock of housing for families. However, there is a case for retaining a certain percentage of HMOs for workers as not all of this category would intend to settle in the Oxford. OCS is however not aware of any evidence that this theory is upheld in practice? -

- **Set H8 HMO's**

Agreed - HMOs are a necessary part of the housing provision in Oxford, given availability and cost (of purchase or rental). The current 20% limit in an area should be retained for a number of good reasons – community, investment in the appearance of a location.

- **Set H9 Location of new student accommodation.**

Agree alternative option Student housing. As government policy (NPPF) requires LAs to plan for needs, guarded support for option A. Support no parking. The alternative option to restrict locations to existing campus sites, student accommodation sites is preferable. Policies on student housing need to recognise that there are a large number of academic institutions which are NOT the two universities and about which there seems to be little knowledge of student numbers.

- **Set H10 and H11 (i) Student Accommodation and (ii) Managing Student Accommodation.**

Preferred Option B agreed - provide student housing for growth of academic facilities. Guarded support for existing policies A and B.

- **Set H11 Managing student accommodation.**

(i) Preferred option B will prevent speculative building of student accommodation; (ii) there is no good reason for any student to bring a car into the city. The data on the increase of vehicles in term time against those out of term must be telling.

- **Set H12 H13**

Preferred Option agreed - do not search for sites but set criteria for any that may be found; (a) the preferred Option is adequate. (b) is unnecessary. OCS notes that policy needs to be consistent with that of the Canal and River Trust. Provision for water and sanitation infrastructure is an issue. Are power supplies (solid fuel, portable generators etc.) consistent with pollution and zero carbon policies? It is a waste of resources to search for new mooring sites as a) there is very low probability of finding any, and b) the quantity of new accommodation likely to result is minute.

- **Set H14 Elderly persons' accommodation.**

Preferred option agreed - support accommodating elderly in all large-scale housing schemes to ensure mixed community and the wish of many of the elderly to downsize which would leave some houses available for families. Probably agreeing options A and C.

- **Set H15 Self-build and custom-house building.**

Preferred option agreed - support self-build but unsure if this is viable within the city. It is an innovative proposal and could lead to development sites that have architectural character. Clearly minimum standards of build should be enforced.

- **Set H16 Support community led housing.**

Preferred option - there should be no relaxation of space standards for any housing type. Community-led housing must deliver the same standards as all other housing providers are required to provide. If anything, CLH should be seen as superior to 'market' housing, not just cheap.

2.3. CH 3 Economy and Global City.

Strongly in favour of mixed-use city.

- **Set E1 Strategy. Employment Strategy.**

Preferred option - Prefer a. and b. Oxford's contribution to the national economy seems to be constrained by a) recruitment difficulty owing to cost of housing, and b) availability of suitable premises (right size, right specification, right place); a balanced strategy is needed.

- **Set E2 Making best use of employment sites**

Preferred option - support options a. and b. Focus on support for employment sites that align with Oxford's key strengths and protection for those which assist the local economy. These are likely to further support economic objectives for the plan and could encourage a range of employment opportunities.

- **Set E3 Allow housing on existing employment sites**

Preferred option - Allow an element of housing delivery on existing employment sites (if other policy requirements, for example around flood risk, are met). Locating housing close to jobs can bring benefits for local services and facilities and can mean that more of Oxford's housing need can be met within its boundary. This may help to meet Oxford's housing need and provides flexibility if circumstances and values change over time, even if owners and developers are not interested in introducing housing to their sites currently

- **Set E4 Location of new employment uses**

Preferred option - Support new employment uses through intensification and modernisation of existing sites

This approach would retain a geographic focus of employment uses in existing centres and employment locations. This may provide capacity for much of the employment space needed without requiring additional land which could be used for other purposes. One potential departure from this could be any development opportunities at the new rail station.

- **Set E5 Warehousing and storage uses**

Preferred option - Prioritise land for more efficient and intensive employment generating uses. In exceptional or essential circumstances (to be defined), sites may be designated as lawful use.

- **Set E6 Employment and skills plans**

Preferred option – Introduce a policy requiring applicants to submit an Employment and Skills Plan alongside major development proposals, which also looks at the potential for engagement with training and education.

The policy will aim to encourage applicants for employment land to consider both the training, education and employment benefits that they could bring to an area. This policy may be encouraged rather than enforced. The affordability of land will be important so as to enable employers to seriously consider their commitment to the local employment market.

- **Set E7 Affordable workplaces**

Preferred option - Introduce a policy requirement for affordable workspaces to be delivered as a percentage of all large commercial development

Such an approach would likely secure the most affordable workspace and help facilitate an inclusive and diverse economy

- **Set E8 Short stay accommodation – New**
- **Set E9 Short stay accommodation – Existing**

Preferred options a. and b.

The option for new accommodation on allocated sites only would restrict the conversion of family dwellings or HMOs to short-stay accommodation (Airbnb). Increased investment in Oxford's economy will create demand for services in Oxford which will benefit local business.

The aim of this policy option is to encourage more visitors to stay overnight rather than the current day trip. The number of hotels in the city is rapidly increasing – these include the major chains with the potential to provide affordable accommodation.

2.4. CH 4 Climate Change and Bio-diversity.

We strongly support policies which protect and enhance green spaces and prioritise where and how we build. Strongly support policies that provide a safe well-maintained bio-diverse, green public realm. Support needed for council budget and for action.

- **Set G1 Protection of GI network and green features.**

We support policies which ensure that utilities and land-owners maintain waterways and their banks and provide access to and a safe environment for nature, wild-life and people.

Preferred options – we favour a. b. and c. and would be seriously concerned in options d, e. was taken forward.

- **Set G2 Provision of new GI features**

Preferred option – we favour b. Larger developments potentially offer the biggest opportunities for achieving new, worthwhile open space in the city – ensuring these are captured with a requirement for a specific level of open space helps to contribute to new open space provision.

- **Set G3 Urban Greening factor**

Preferred option - Incorporate the use of an Urban Greening Factor (UGF) into policy, requiring proposals to demonstrate a betterment in score (above a minimum) as part of the design of the development. The implementation of such a policy would allow for greening on sites to be quantified and seeking a betterment should help to green the city over time. Many areas would benefit from urban greening, as evinced by the current Broad Street project.

- **Set G4 Delivering mandatory net gains in bio-diversity**

Preferred option – we favour b. as this would require higher than 10% net gain on certain sites, in excess of the minimum requirements of the Environment Act. It recognises the importance of supporting biodiversity and acting on biodiversity decline nationally.

- **Set G5 Protecting and Enhancing Biodiversity**

Preferred option – our preference is b. which seeks to introduce Policy with prescriptive requirements to secure biodiversity features on site. Such policy would highlight on-site biodiversity measures as a priority for the Local Plan/Oxford City Council.

- **Set G6 Protecting Oxford's ecological network.**

Preferred option – we support option a. This would ensure that the city's most important areas of habitat and species are protected from the direct and indirect impacts of inappropriate development in future.

- **Set G7 Flood risk and flood risk assessments**

Preferred option – we support a. It is essential to protect the city from flooding which has been a problem over the course of and preparation of many Local Plans. It is essential to reiterate national policy and set out requirements for when an FRA will be required.

- **Set G8 Sustainable drainage systems (SUDS)**

Preferred option – we support both a. and b. on the grounds that all new developments must provide a SUDS and also that there is an expectation that foul water is separated from surface water drainage on development sites.

- **Set G9 Groundwater flows and sensitive sites**

Preferred option – we support both a. and b. on the grounds that option a. would seek to ensure that proposals take account of any impacts they might have in relation to ground and surface water flows on nearby sensitive sites and mitigate any potential harmful effects and b. would include a bespoke policy for the Lye Valley to consider the impact of development upon the hydrogeology of the Lye Valley SSSI

- **Set G10 Resilient design and construction.**

Preferred option – we support both a. and b. Option a. would set out a strong position/stance on the issue of climate adaptation and building resilience to climate impacts which could negatively impact on health and wellbeing. Option b. would require major development to achieve certification against a recognised sustainability assessment – e.g., BREEAM/HQM.

2.5. CH 5 Net Zero buildings in operation

- **Set R1 Net Zero buildings in operation**
- **Set R2 Embodied Carbon**

Specify design in accordance with energy hierarchy principles. Mandate net zero operational regulated energy from adoption of the Plan

We are generally supportive of the policy proposals and strongly support retro-fitting. In our view currently it is not feasible to support the prevention of fossil fuel heating until a national policy is in place for an affordable, safe and secure system. There is a mixed bag covering again some of the previous issues. Generally supportive. Strongly support for a retro fitting. Unable to support prevention of fossil fuel heating until a national policy is in place for an affordable, safe, secure system.

- **Set R3 Retrofitting Existing Buildings (including Heritage assets)**

Include a presumption in favour of retrofit measures for all existing buildings that are not heritage assets or in the setting of, subject to certain conditions, where these measures secure demonstrable carbon reduction/energy efficiency/climate adaptation.

Preferred option – we favour both a. and b. Option a. recognises the high priority afforded to the retrofit need in the city and seeks to ensure that retrofit measures that require planning permission will be supported wherever possible – particularly where demonstrable benefits for climate (mitigation or adaptation) can be evidenced. Option b. addresses the retrofit need in the context of historic buildings and heritage assets and recognises the particular challenges present in the need to balance heritage considerations.

- **Set R4 Efficient use of land.**

Have a policy requiring that development proposals make the best use of site capacity, in a way that is compatible with both the site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area, and bearing in mind that large scale proposals will be suitable in many situations

Preferred option – we favour option c. Have minimum density requirements to cover the whole city, for various types of location such as suburban, gateway, district and city centre. This would fully meet NPPF requirements. It gives a very good starting point for ensuring efficient use of land and resisting applications that do not achieve it. This approach makes it very clear in terms of what is expected.

- **Set R5 Air quality assessments and standards**

Air Quality Assessments (AQAs) will be required for all major developments, or any other development considered to have a potentially significant impact on air quality

Preferred option – we favour a. and b. Option a. provides a means of Improving local air quality, mitigating the impact of development on air quality and reducing exposure to poor air quality across Oxford is key to safeguarding public health and the environment. Option b. would set a high standard for accepted Nitrogen Dioxide emissions from all new development in recognition of the rigorous target the City Council has set locally within its Air Quality Action Plan.

- **Set R6 and R7 Water and land quality.**

Preferred option – a. It is important to ensure that what land is available is used in the most efficient way possible, while ensuring that there is no harm to the city's natural environment, human health and well-being. We fully support policies which safeguard quality.

- **Set R8 Amenity and Environmental Impacts on Development.**

Preferred option – we support a. Require that new proposals do not result in unacceptable impacts on amenity as a result of noise, nuisance from light, dust, fumes etc. The impacts of developments must be mitigated to ensure that the amenity of communities, occupiers and residents are protected.

2.6. CH 6 A city of culture

- **Set DH1,2,3 (Principles of high quality; Specific design guidance; View cones and high buildings**

Develop design guidance/codes specific to an area or type of development. The work of the Design Review Panel should be more transparent and involve more/better consultation with local organizations (such as OCS, OPT) and local communities. We would advocate some measure of flexibility as there is a general wariness of the danger of Design Guides in the hands of architects and developers. We also have a more relaxed approach to view cones and high buildings. Rigid restrictions would exclude innovative and exciting architecture, creating uniformity.

- **Set DH4 Public art.**

Public art can inject colour and character into an area, making public spaces more interesting and enjoyable to move through and spend time in.

Preferred option – we favour b. which provides expectations for public art within the design checklist, but does not have any specific requirement. This would acknowledge the importance of public art in enhancing public realm and adding local distinctiveness.

- **Set DH5 Design of Bin and Bike Stores and External Servicing Features**

Contributing to the functionality element of new development, high quality design needs to support people to live sustainably in their homes and the places they go to work

Preferred option – we support options a. and b.

Crucial to supporting the shift to a net zero carbon city, is the need for supporting people to travel via low/ zero carbon methods, a key element of this is providing space for secure cycle storage so that they can travel by bike around Oxford. In residential areas, particularly those with HMOs, bins and bikes frequently litter or block pavements and area a hazard to pedestrians and those with mobility issues. Additionally, they are a blight on the streetscape. Developers/landlords must be required to provide appropriate storage and some form of checking should exist to ensure enforcement, which could include the loss of an HMO licence or a significant fine.

- **Set DH6 Bicycle parking design standards**

Preferred option – we favour options a. and b. If we are to encourage more cycling in Oxford then high levels of secure parking is essential. The provision of a high level of well-designed cycle parking will help to encourage cycling across the city which brings positive benefits such as improved air quality, reduced congestion, enhanced public realm and healthy lifestyles.

- **Set DH7 Motor Vehicle Parking Design Standard**

Preferred option – a. A lower level of parking provision across the city means that less land is being used for parking cars, also the reduction of car ownership and car trips in the city can help reduce congestion and air and noise pollution. Fewer car movements will encourage people to walk and cycle as they will feel safer, and parents will feel more confident allowing their children to cycle or walk if there is less traffic on the roads.

- **Set DH 8 Privacy, Daylight and Sunlight**

Preferred option – we favour both a. and b. The extension of policy to include expectations for daylight, privacy and sunlight for new non-residential buildings should sit alongside the requirement for policy with requirements to ensure adequate daylight, privacy and sunlight to new residential developments. This would ensure new development provides adequate daylight and privacy and does not reduce privacy and daylight in existing development to an unacceptable level

- **Set DH9 Internal space standards for residential developments; DH10 Outdoor amenity space**

Preferred option – a. Apply Nationally Described Space Standards. In flatted schemes and HMOs, the adequate provision of outdoor amenity space is important as it supports the physical and mental health and wellbeing of residents. Communal areas should be designed to enable neighbours to meet and interact, for example some fixed seating, wider areas of corridor or lobby space.

- **Set DH11 Accessible and adaptable homes**

Preferred option – we favour a. We endorse the need for housing provision across the city to ensure that it meets the needs of everyone whatever age and stage of life. Providing opportunities for residents to maintain their independence is very important and can help to alleviate pressure on health and social care if older people can remain in their homes adapted for their needs. Policy should ensure that a % of affordable homes and market homes (dependent on needs, viability and practicality but currently 100% affordable and 15% market) are constructed to accessible and adaptable homes standards set out in Part M4(2) and M4(3) of the Building Regulations. For M4(3) for Social Rent these should be able to be adapted to the needs of the household who will be occupying them, ahead of their occupation

- **Set DH12 Healthy Design and Health Impact Assessments (HIAS)**

Preferred option – b. Include a requirement for HIAs, not just based on a size threshold but other factors such as socioeconomic, health or environmental factors that could trigger the need for a more extensive HIA

- **Set DH 13 Designated Heritage Sites**

Preferred option – b. There are a variety of designated assets in the city, from conservation areas and historic parks/gardens, to listed buildings and scheduled monuments, and their protection is not only about the features of the assets themselves, but often also about their wider setting. Option b. ensures that new development schemes are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. .

- **Set DH14 Local Heritage assets**

Preferred option – a. to include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for assessing whether an asset has locally important heritage interest. Such policy would add clarity and highlight the importance of local assets and ensuring something of their significance is reflected in new proposals.

- **Set DH 15 Archaeology**

Preferred option – c. A clear Policy that states wherever archaeological deposits or features are suspected to be present that sufficient information is provided to define the character, significance and extent of such deposits including a heritage assessment and full archaeological desk-based assessment if the initial assessment suggests this is relevant. Where development would impact on archaeological features and deposits it will only be supported where the harm can be eliminated, or where there is clear and convincing justification that the benefits outweigh the harm. This sets out from the start exactly what is expected which aids certainty for developers.

2.7. A more equal city with strong communities and opportunities for all

A place where people of all ethnic, social and economic groups have the opportunity to meet their aspirations and live together within easy reach of facilities necessary for a fulfilling a healthy life. Is this achievable? What has been done over time under previous Local Plans with similar ambitions? The Council have in the past given insufficient support for small independent businesses preferring to support high-end national companies who have now deserted the city. Places for gatherings and markets are all very well but do they give real support for action to create a more equal city?

- **Set C1 Focussing town centre uses in our district centres**

Preferred option – a. This supports the city centre and district centres and encourages them to be placed at the heart of their communities. This promotes sustainable travel, supporting the 15-minute cities concept by ensuring that facilities are focused in these locations that can be easily reached by sustainable modes and allowing various needs to be fulfilled in one trip, encouraging people to stay longer.

- **SET C2 Support policy for ensuring development delivers safe streets with active frontages.**

Preferred option – a. We consider it essential that frontages in the city centre and all district centres remain as Use Class E on the ground floor. This is essential to retain the integrity of streets in the city. The provision of living space on the upper floors of properties on many major streets/roads across the city would bring back vibrancy and life which is sadly lacking at present.

- **SET C3 Protection and alteration of existing local community assets.**

Preferred option – a. This approach recognises the importance of local community assets and that these make a valued contribution to the health and wellbeing of local residents. The starting position is that these should be protected from loss.

- **SET C4 Provision of new local community assets.**

Preferred option – a. We generally support the provision of new local community assets in the city. These should be in an accessible location by walking, cycling and public transport (defined in terms of 15 minutes walking in the first instance). These facilities can form an important part of the social fabric of an area, and can support positive health and wellbeing both physical and mental.

- **SET C5 Protection and alteration of existing learning and non-residential institutions.**

Preferred option – a. Protect existing learning and non-residential institutions with a policy that would resist their loss, in particular local libraries.

- **SET C6 Provision of new learning and non-residential institutions.**

Preferred option – a. We favour the provision of new learning institutions. However, there must be criteria for assessing the suitability of proposals for learning and non-residential institutions. This is essential in order to protect the integrity of Oxford as a place of learning. In the past there have been instances of dubious foreign universities/colleges/schools setting up in the city.

- **SETS C7,8, 9 – Protecting social, cultural and visitor attractions; Provision of new; Pubs.**

Preferred option(s) – in all cases we support a. which protect and enhance social and cultural assets. Provide a criteria-based policy to assess the suitability of proposals, which looks at accessibility, environmental and transport impacts to determine the acceptability of proposals for these uses. Pubs are an integral part of any community and they have been seriously affected by Covid and now the cost of living. There should be more opportunity for these establishments to become community owned, supported by local policy.

- **SET 10 Transport assessments, travel plans and servicing and delivery plans.**

Preferred option – a. This approach will encourage measures that reduce the need to travel and manage congestion. Recognise that public transport has its short-comings. Provide policies which provide action for improving public transport, increase its routes and outreach, support a well-connected, cheap, rapid transport system., which will more likely achieve the stated aim.

2.8. Development Sites, Areas of Focus and Infrastructure

The city-wide infrastructure is discussed. However, the drawing of the city boundary is not helpful in understanding the nature of Oxford and its economic relationship to its immediate and regional settlements. Whilst their integration into a wider regional policy is surely obvious and welcome the recent demise of this ambition is disappointing.

The areas of focus are an interesting way of looking at the city particularly in the delivery of Local Plans. Identifying sites within these areas is helpful. One wonders how many have been granted development permission.

The analysis of the Areas of Focus is interesting. A more comprehensive assessment of Neighbourhood Plans should have been incorporated. Whilst Wolvercote is cited in the Sites chapter it was a rare example. Diamond Place is listed too in this chapter. However, there is no mention on this site of the much-needed Health Centre, Community Centre renewal and to accommodate identified need for satisfying the desire to downsize which would release larger properties for families.

The inadequacy of the primary health care service is recognised. Should this be discussed in CH 7? The area branch of the Integrated Care System (BOICS) is expected to produce priorities for the city which will be incorporated into the Local Plan. Has this not been a problem for some years. Was it identified in the ISSUES consultation? Have Utilities and Digital companies been engaged in recent years about energy use and with digital connectivity fit for the coming decades? How will this be achieved and what are the principal implications on Oxford's environment?

On education, the County Council have indicated that there is sufficient capacity within the Oxford's secondary schools to meet the needs of housing growth within the city's boundaries.

- **SUI8.2 Policy Option Set for the South Area (Cowley Branch Line, Littlemore and the Leys Area) Area of Focus?**

This Area of Focus includes the area around the Kassam Stadium, and the proposed Cowley Branch Line (CBL) where several of the city's key employment sites lie, including the large employers of MINI Plant Oxford, Oxford Science and Oxford Business Park. Key objectives for this area are around improving and enhancing connectivity to this part of the city by modes other than by private car

Given current and planned developments on the East side of Oxford, the reopening of the Cowley Branch Line would greatly enhance connectivity and in accordance with the County's transport plans, reduce vehicular traffic. We have doubts that the likely improvement in connectivity which the CBL may provide will deliver - how many use the Oxford Parkway to Oxford Central route?. Re-opening the CBL is not within the control of OCC; is it sensible to make policies assuming a) it is going to happen before 2040 and b) it is likely to significantly improve public transport options? PT – members of OCS

Policy Option Set DS1? Digital infrastructure.

Preferred option: b. Have a specific policy, setting out requirements for the provision of digital infrastructure on all new development to meet average digital connectivity needs for all occupants (including working/ learning from home).

If as it seems to be the case that the research capacity in Oxford is to be greatly increased by the presence of spin-out companies and research establishments, then there needs to be a policy in place for the expectations of broadband connectivity in the new buildings that are planned

3. Concluding remarks

Policies should reflect the human scale of the city and ensure its social and economic infrastructure is achieved with a reliable cross city public transport system, a sustainable delivery system, safe and continuous cycling route and a pleasing public realm for walking about in as well as a proper assessment of housing and construction to provide accommodation for dwelling, commerce and culture on appropriate sites. Policies should be made to provide a safe liveable city centre with everyday facilities on the doorstep. Policies for a well-connected city, safe movement and high-quality design are well meaning if very late in the day, considering the status of the Oxford and the oft quoted council's view that they are working to make Oxford a better place. It is clear that there is a long wish-

list much of this will be difficult if not impossible to achieve as many of the requirements for satisfactory outcomes are beyond the control of the council.

Whilst the wide ranging and often conflicting issues facing Oxford have resulted in an excessively detailed set of proposals many of which are indeed supportable, the authors of the Plan are recommended to reflect on previous Local Plans and their effectiveness and Neighbourhood Plans. They should also reflect on the issues consultation in relation to the making of the Local Plan 2040 and write a coherent, succinct document fit for public consultation.

3 OCS Transport Group detailed comments

0.1.1 talks about optimising the opportunity for people to be able to reach facilities they need within a 15-minute walk. But not all of those facilities will be within a 15-min walk for all. Good transport to be able to reach those other facilities should therefore be an important part of the Plan. As acknowledged under Built environment in 1.1. This also talks about not encouraging car-based development, but does not go to the next stage by requiring development to be well served by existing or new public transport.

1.2 Not all residents will be able or wish to access everywhere in Oxford by cycle or foot. Need to add sustainable public transport.

1.7 The great economic advantage of a city is of lots of people living in close proximity, interacting with each other. This requires good intra-city connections. The future Osney Mead looks like a BAD example of this with poor connectivity.

1.9 Absence of any idea of improvements of bus services required. It is important that land is safeguarded for good public transport and active travel and not just developed willy-nilly for £££.. Student Castle on Oxpens is a good example of failure to do this, and we may expect more failures around the rail station.

1.12 We question whether the areas mentioned are easily accessible by sustainable means. Comment on 1.9 above refers.

1.16 Many “green features” in developments are architects’ dreams, not naturally biodiverse. If the green areas were integrated into one larger area, this would be better.

1.17 Need to include land used for car parking here. Front gardens paved over (you can retain quite a large green area and still put a car on it). How many of Oxford’s roads are effectively single-track country-width rural roads with passing places where the odd car has not been parked? In Freiburg I understand that small multi-storey car parks are provided in some roads for residents’ cars. These can be more secure, and of course free up potential green/play space. Many larger apartment blocks in Europe have subterranean car parks.

1.18 Potential for remanufacturing from recyclable materials?

1.21 Wildly optimistic hope that planning will reduce effects on climate change.

1.22 Needs to distinguish between reduction by adaptation and by mitigation.

1.24 The transport system also needs to contribute to the built environment. Having mini-bus stations all over Oxford detracts severely from the historic centre. Bus/rapid transit routes should transit the

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city, not terminate there (think 400/U1). Use P&R sites for inter-town services (which would stop them getting held up and contributing to congestion in the centre).

1.27 Who is going to pay for “all the facilities we need for our daily lives” in 15-minute communities if they are not economically viable? Has anyone studied what actually happens/where local shops are viable?

1.29 No ideas about managing tourists!

1.32 Are talking about lower carbon or zero-carbon lifestyles?

1.35 Transport hubs: no description of what they might be like. Need to safeguard land for them.

1.36 The public transport network is only good compared to the lamentable state in some other cities. The failure of bus ridership to increase beyond 20% over many years shows its limitations. Trams typically can double ridership – Rapid transit again, linked to out-of-town centres such as Abingdon, Woodstock. Small hubs for more local transport options (and in rural Oxfordshire too).

1.37 Yes – do it!

1.38 Public transport links are usually limited in their scope. e.g., Cowley-Oxford City good. Cowley-hospitals poor.

1.43 and S3. Who decides what is sustainable? Sustainable for a developer means a good profit, widely used to reduce numbers of “affordable” homes.

2.0 Are we talking about houses or about dwellings (i.e., including apartments)? Many people prefer apartments, without the need to look after gardens; they are also more thermally efficient. Apartment blocks make more efficient use of land, and can provide attractive and overlooked green spaces for e.g., small playgrounds.

2.11 and H6. Nothing here about room sizes or storage provision, both of which are important.

2.13 HMO’s – not just in the city.

2.15 H9, H10. What is meant by Student? Undergraduate, graduate, post-graduate? Each has rather different needs (e.g., maybe for a family). Not considered.

2.20 and H14. What about building lifetime homes, i.e., homes that allow for people’s decreased mobility as they get older e.g., by providing larger passages, thus freeing up the need for them to move to other accommodation, often at high expense?

3.4 A more sustainable transport system – do the developers of innovation clusters actually contribute to public transport? Is the need mainly for commuting? Nothing about this in E1.

3.5 What about the next stage after R&D? Where is the space for small businesses and their expansion (e.g., Oxford Instruments in the past)? Why, in 3.7 should the businesses have to move elsewhere?

3.16 and E5. Warehouses are ideal for PV installations – can they be required to include them?

3.17 Freight consolidation centres. The University is already doing this to some extent. This item should be much more positive, not just avoiding them happening. It will be easier to move from fossil-fuelled vans to electric ones, and some companies have already done this.

3.18 and E6. There is a lot of emphasis on R&D, but those working in this area also need support, often by lower-paid workers. Where are these lower-paid people going to live? Covid-19 showed us the importance of many of these key workers.

3.24 states the problem, but offers no solutions. The issue involves wider areas than Oxford City (e.g. Blenheim, the Cotswolds) and could there be solutions encompassing both?

4.34 and G7, G8. Do the water companies know how much of the run-off drainage goes into the foul sewer system, where it can overload it and lead to pollution of natural water sources?

4.38 and G10. Importance of vegetation cover rather than tarmac or paving cooling the air by transpiration.

5. It would be useful to distinguish between **adaptation** (i.e., taking action to reduce the impact of climate change – think e.g., more planting to increase transpiration and thus cooling, better flood defences etc) and **mitigation**, (i.e., reducing the causes of climate change e.g., by reducing carbon dioxide emissions or capturing it from the atmosphere). There appears to be more emphasis on mitigation than on adaptation.

The issue of **offsetting** needs to be specified much more clearly. It is widely used because it usually involves action somewhere else that is not easy to control, but sounds good. A tree planted tomorrow doesn't remove much carbon dioxide for the first ten years of its life.

5.12 and R2. Embodied carbon. Surely in a development this needs to be estimated before construction begins, not at the construction stage (R2b). Also, embodied carbon needs to be accounted for in all imported materials. Much of GB's "good" performance is due to the embodied carbon occurring during manufacture abroad of items that are imported (notably from the People's Republic of China). Retrofitting (R3) will have a cost in embodied carbon. Exchanging a fossil-fuelled car for an electric one has a high embodied carbon cost. Could Oxford develop processes for re-engineering fossil-fuelled cars instead – it goes against the business model of the car companies, of course, but no reason not to try?

5.18 and R5 Air quality – no mention of trams here, which are probably the cleanest form of powered transport (no Oslo small particle effects from tyres on tarmac, and easy regenerative braking). Hotspots are good places to make measurements, but the reduction is a general problem, not one that can easily be tackled very locally.

R6 Water quality. Much of the current concerns appear to arise from mixing surface drainage systems and foul water systems. It is not clear that Thames Water knows what is actually happening/where the drains go. If the two systems could be separated there would be much less risk of storm surges leading to polluted rivers and their consequences. Lack of recent investment very noticeable here.

6.5 Good design. This also needs to apply to transport systems. Far too much of central Oxford is taken up by what are in effect mini bus stations, leading to blighting of key historical views (think High Street, St. Aldates). This approach is also wasteful of land in the city centre. Local buses should run through

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the city centre with easy interchange. Out-of-town services and the Tube and Airport buses could start from P&R sites, themselves connected by the city bus or rapid transit system.

DH1 What is good design? Not specified. Appearance, functionality?

DH5 Yes to designing bins and bike sheds into buildings What can be done about Bin Streets whose main feature is a straggly line of multi coloured bins stretching along both sides of the road (think e.g. Charles Street). HMO's big culprits here.

DH6 What about providing small multistorey parks for cars and bikes (as in Freiburg). Too many Oxford roads are essentially rural single-track roads with occasional passing places where a car hasn't been parked. A waste of expensively provided load-bearing road space.

DH7 see comment on DH6 above. Some car parking space will be needed, it just shouldn't intrude on thoroughfares.

Policies DH6 and DH7 on parking standards for new developments in the City's LP 2040 Preferred Options document were significant from a transport point of view, especially in the light of policy 33 in LTCPS and the County Council's recently updated guidance on the subject.

Policy DH6 on bicycle parking is I think straightforward. The preferred option (a)+(b) is essentially to retain the present minimum standards in LP 2036. I doubt whether any TG member would support alternative c - 'considered detrimental' of lowering these standards!

However, the situation with vehicle parking (DH7) I find confusing. Policy M3 in LP 2036 states - apparently unequivocally - that subject to certain locational criteria "planning permission will only be granted for residential development that is car-free". Rather strangely though the accompanying text (para 7.27) states that " for many residential schemes... car-free developments are *expected*" (emphasis added) implying more of an aspiration than a requirement.

In the LP 2040 Options document the preferred policy approach is said "to *seek* car-free development across the city" (subject to locational criteria) implying a weaker stance than adopted policy M3, although it is not presented as such. However such a stance would be consistent with the potential negative consequences listed for car-free developments which include inability to accommodate the needs, for example of people who regularly require use of a car for work purposes. Otherwise, and where parking provision *is* permitted in other parts of the city, lower maximum standards are proposed than elsewhere in the county, consistent with the County Council's recent guidance.

Alternative options are suggested as (a) to require all new residential developments across the city to be car-free or (d) to forgo the car-free component and vary maximum parking standards within the city according to locational accessibility.

The preferred option seems to strike an appropriate balance but does it represent a change in stance towards car-free development from current policy and practice by the City Council?

DH9 space standards (including storage spaces) need to be enforced. What about the idea of whole life homes designed so that they allow people to live in the same house as they become less mobile? Is a percentage required in new developments – it could help create mixed communities. (see DH11)

DH10 Outdoor amenity space needs to be designed in from the start, not just what is left over in odd corners of a plot.

DH11b should not be trying to discourage the provision of lifts in smaller blocks of flats – they are essential for the disabled and reduce the chance of injury from falls on stairs (are there statistics for this?). Yes, they are expensive, but should be considered as an essential part of construction.

C1 There needs to be consideration of public transport linkages between the 15-minute areas, as it is likely that not all needs can be met within each centre, and some have specific locations e.g. hospitals, cinemas, schools.

C2 Active frontages. Don't think Westgate. Will there be enough business (in the widest sense) to economically maintain enough active frontages?

C9 Pubs. People aren't using them as much (cheap supermarket booze, too much time on mobiles, changes in habits). So why try to keep them if they are uneconomic (but is this partly the fault of rapacious pub chains?).

C10 Transport assessments. I've never come across a developer who admitted that the proposed development would have an adverse effect (usually supported by reams and reams of barely intelligible graphs).

p.228 fig D5 is called Cowley Branch Line, but doesn't actually show it. More detailed on the ground examination shows that the Line, even if suitable and affordable for local services, doesn't run close to many housing areas. A light rail connection (as part of the Rapid Transit system) would be cheaper and could serve far more destinations and thus get more use.

8.14 The design brief for the West End and Botley Focus does NOT currently have adequate infrastructure proposals.

8.22 the new battery buses (if introduced) will only affect pollution levels from exhaust gases. There is nothing here about the wholesale reorganisation of public transport that is needed to make it more efficient. There are already serious questions about whether the proposed bus gates will actually reduce congestion significantly.

8.25 EV charging strategy. This is a totally different strategy from the current fossil-fuel fuelling practice. On-road charging will have effects on traffic and parking far beyond the laying of cables across or beneath pavements. This doesn't seem to have been thought through. There's nothing about the provision of extra electric supplies that may be necessary or about costings for using charging points.

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