

# Oxfordshire Plan 2050: Regulation 18 Part 2

Consultation response, by Planning Oxfordshire's  
Environment and Transport Sustainably (POETS)

October 2021

POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

For more information go to [www.poetsplanningoxon.uk](http://www.poetsplanningoxon.uk)

## Summary of key points

1. The key themes of Oxfordshire 2050 should be climate change, people's wellbeing, reduction of inequalities, and support for Oxfordshire's economic and environmental strengths. This does not square with the 'transformational' levels of very high growth proposed.
2. POETS have strong misgivings about the accuracy of the growth figures in the Oxfordshire Growth Needs Assessment (OGNA) which underlies Oxfordshire 2050. The OGNA should be peer-reviewed by a panel of independent experts.
3. There cannot be proper consultation unless there can be confidence in the housing and employment targets and a clear understanding of how they were produced.
4. POETS strongly oppose the high levels of growth in the 'business as usual' and 'transformational' trajectories. POETS are not convinced that even the lowest level of housing and employment growth proposed for Oxfordshire 2050 is soundly based.
5. Oxfordshire should set its own growth targets which take into account Brexit, falling birth rates and the levelling up agenda. It should not follow the high growth rates of the recent past, the unrealistic aspirations of the Oxfordshire Local Enterprise Partnership, or government plans for the Ox-Cam Arc.
6. In the absence of a preferred option for the level of planned growth, it is difficult to comment meaningfully on a possible spatial strategy.
7. Oxfordshire 2050 should be clearer about how many affordable homes will be delivered, how this will be done, and how they will be made truly affordable.
8. Oxfordshire 2050 should back-cast (set a future target and determine what needs to be done at various stages to achieve the target) for a response to climate change. It should include requirements for retrofitting existing buildings to reduce their energy use.
9. Oxfordshire 2050 should state that no major new roads would be built in the county.
10. Oxfordshire 2050 should prevent further development in areas remote from frequent public transport and essential services.

## General

1. POETS consider the plan provides an important opportunity to get effective strategic planning for Oxfordshire back on track which should not be missed. Our fundamental concern is with the overall vision for the economy and the high levels of growth that are being proposed. They would require unprecedented numbers of people moving into the county to live and work, which we believe would be detrimental to the delivery of the plan's apparent wider ambitions for Oxfordshire.
2. POETS recognise that Oxfordshire has a global reputation for innovation and must contribute to the success of the economy by playing to its strengths as a thriving centre of learning, research and innovation. But we do not accept this means growth at all costs, particularly given the overriding importance that should be attached to the climate emergency.
3. Some believe that the national interest is best served by exploiting as much as possible the 'growth' potential of so called 'Oxford-Cambridge Arc' – but which is likely to further overheat the South East economy at the expense of other regions and the environment<sup>1</sup>. Current proposals for the Arc over the next 30 years would see 1.1 million additional jobs and 1 million additional homes – equivalent to 8 new towns the size of Milton Keynes. Yet <sup>3</sup>/<sub>4</sub> of homes are for people from the rest of the UK or abroad. Such high levels of growth are potentially disastrous in the face of the climate emergency and completely contradict the levelling up agenda. It is not possible to have high levels of economic growth, an enhanced and thriving environment, achieve zero carbon emissions, and make everyone healthy and happy. Difficult choices will have to be made.
4. When finally approved, proposals for the Arc will become national guidance and planning authorities will be under immense pressure to follow it. Oxfordshire 2050 should seek to influence proposals for the Arc based on what Oxfordshire wants, rather than waiting to have housing and job numbers imposed from above. 'Going for growth' in the sense of maximising GDP is increasingly out of date and out of step with new realities. Councillors in Oxfordshire should demand a radically better future that responsibly balances and aligns social, environmental and economic factors in the context of the climate emergency and the need to level up opportunities within the UK.
5. The starting point for the Oxfordshire plan must be a clear vision supported by a succinct strategy which puts the climate emergency at the centre, focuses on people's wellbeing (including reducing inequalities between socio-economic and demographic groups) and enables Oxfordshire's distinctive economic and environmental strengths to flourish<sup>2</sup>. We have serious misgivings about the growth figures in the Oxfordshire Growth Needs Assessment (OGNA) not least

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<sup>1</sup> See POETS response to proposals for the Oxford-Cambridge Arc 'The Oxford-Cambridge Arc: A critical assessment', July 2021 <https://www.poetsplanningoxon.uk/poets-oxcam-arc-critical-assessment-paper-210721.pdf>

<sup>2</sup> See POETS paper 'Balancing Oxfordshire's growth in a climate change emergency' June 2019 [https://www.poetsplanningoxon.uk/POETS\\_Balancing\\_Oxfordshire's\\_Growth\\_in\\_a\\_Climate\\_Change\\_Emergency\\_final\\_June19.pdf](https://www.poetsplanningoxon.uk/POETS_Balancing_Oxfordshire's_Growth_in_a_Climate_Change_Emergency_final_June19.pdf)

because the methodology is not explained or referenced properly. Politicians should not be asked to approve something with such far reaching consequences based on an obscure and potentially deeply flawed assessment. **POETS consider that the growth figures in the OGNA must be reviewed by a panel of independent experts (to which we would be happy to contribute) and its findings published before the Oxfordshire plan is progressed.** There is no need to commit now to excessive growth that may never materialise especially as there are huge uncertainties resulting from the pandemic and Brexit, the long timescale of the plan, and the large amounts of land already identified for employment and housing in local plans.

6. Most local authorities in Oxfordshire have adopted the climate emergency as **the** guiding principle, but it is difficult to detect it in the consultation document. The plan should be 'transformational' in the way its policies, funding and actions are directed towards mitigating and adapting to climate change. It should set out where we need to be and how to get there. It would not be 'transformational' by proposing very high levels of growth (with all the CO2 releases from potentially unnecessary new construction) accompanied by a few comforting words aiming to address climate change and protect the environment. Although the climate crisis rightly gets much attention, there is another crisis, biodiversity loss, which is directly relevant to future Oxfordshire and should be considered. The plan should also be transformational in its policies for addressing the need for genuinely affordable housing which is one of the most important challenges facing Oxfordshire. It should set its own definition and targets and not allow open market housing to be built in its stead.

## Level of growth 2020-2050

7. Of the three scenarios proposed, **POETS strongly oppose the high levels of growth in the business as usual and transformational trajectories.** Business as usual is based on a continuation of pre-covid and Brexit economic performance – taking account of robust performance after 2008. The transformational trajectory is broadly the equivalent of the Oxfordshire Local Industrial Strategy's aspirational 'go for growth' scenario. It was published in September 2019 by the unelected Local Enterprise Partnership that has no democratic credentials. Going for growth could result in a 41% increase in jobs in the county and a 51% increase in households by 2050. Business as usual could result in a 30% increase in jobs, 41% increase in households. We consider that despite strong employment growth in Oxfordshire after 2008, the pandemic and Brexit have brought huge uncertainties in the way the UK economy might recover in the next decade or so, with uncertainties over future trading arrangements, labour shortages and emerging supply and demand constraints globally.
8. If pursued these scenarios would lead to high levels of in-migration from elsewhere in the UK or abroad completely at odds with the levelling up agenda, the government's increasingly restrictive approach to immigration and the climate crisis. Given the unknown effects of Covid and Brexit, a much more cautious approach is called for, especially for employment as there is already net in-commuting into the county for jobs. Contrary to the impression given in the consultation document, building these high levels of housing will not necessarily reduce net in-commuting for jobs and will not of themselves reduce or stabilise

house prices<sup>3</sup>. Neither will they provide sufficient genuinely affordable homes - which are best met by public investment in council or housing association homes or similar. Unrealistically high housing targets will likely result in objections from the electorate and a shortfall against the five-year land supply. Local councils will face planning by appeal, or fear of appeal. It will lead to planning blight, make it more difficult to achieve the redevelopment of more difficult brownfield sites, secure infrastructure provision and coordinate it with development.

9. These ambitions to 'transform' Oxfordshire's economy would significantly harm the environment and character of the county, require major releases of greenfield land (most likely in the form of suburban car dependent sprawl), worsen traffic congestion and CO<sub>2</sub> emissions, and require the excavation of many millions more tonnes of sand and gravel from the river valleys and limestone from the Cotswolds. They will require new supplies of water, almost certainly entailing a massive new reservoir south of Abingdon and need major investment in other infrastructure (including public transport, schools, hospitals, GP surgeries and social care for example) that is unlikely to be forthcoming. Without it, the well-being of residents and the success of local businesses would be seriously compromised.
10. There is already £6bn of unfunded infrastructure schemes that are needed to meet currently planned growth. The Growth Deal 'reward' for 100,000 homes in Oxfordshire (agreed without any public consultation) was £215m (plus a subsequent sum of £420m for highway improvements around Didcot and on the A40 between Witney and Oxford) – paltry sums compared to what is needed<sup>4</sup>. Further major growth is only likely to worsen the funding gap. It is not just the lack of investment in capital schemes that is of concern, but also the lack of revenue to fund services and maintain existing infrastructure. The Oxfordshire Plan to 2050 must not slavishly follow the high growth rates of the recent past or the unrealistic aspirations of the Local Enterprise Partnership.
11. **POETS consider that even the lowest figure suggested for employment, based on the standard method, is too high** given that two thirds are for industry and warehousing, much of which (other than for specialist manufacturing linked to R&D) will not play to Oxfordshire's strengths and could be located elsewhere. It indicates 85,500 additional jobs (21% increase from 2018) needing 445 ha of land. OGNA accepts there are clear uncertainties associated with predicting the future economic performance of a local area particularly over a 30-year period. There will be unforeseen consequences of changes in the global economy, government policy and new technologies. Estimating job growth in different sectors and translating it into a requirement for land is difficult and taking account of the potential of individual sites and redevelopment opportunities complicates it further. For these reasons we consider the Oxfordshire plan should not set out additional long term employment land requirements at this stage. Instead, it should be for local plans to consider whether additional land is required to meet essential needs.

<sup>3</sup> See POETS paper on Affordable Housing, particularly paragraph 5, November 2019

[https://www.poetsplanningoxonuk/poets\\_affordable\\_housing\\_final\\_nov2019.pdf](https://www.poetsplanningoxonuk/poets_affordable_housing_final_nov2019.pdf)

<sup>4</sup> See POETS response to the Oxfordshire Infrastructure Strategy, August 2021

<https://www.poetsplanningoxonuk/poets-oxis-stage-one-consultation-response-290821.pdf>

12. **POETS are not convinced that even the lowest level of growth suggested for housing is soundly justified.** It is for 101,580 homes providing for a 34% increase in households and an average annual building rate of 3,386 dwellings a year. It is significantly higher than the Office of National Statistics (ONS) projections of 53,000 homes from now to 2050. One reason, for example, appears to be a 40% increase due to high house prices relative to local incomes (an approach justified by government guidance<sup>5</sup>): but building more houses will not of itself make housing more affordable. And where are the people to come from? Information in the Oxfordshire Growth Needs Assessment indicates that most net migration into Oxfordshire to 2018 was from overseas, but this was before the UK left the EU. Furthermore, recent figures indicate a dramatic fall in birth rates in the UK and that by 2050 a quarter of Britons will be over 65. This will result in long term shortages of working age people that will have negative effects on the productive capacity of the economy<sup>6</sup>.
13. In addition to a peer review of the OGNA **POETS consider that the government's standard methodology for assessing housing need must be challenged and the growth figures revised before the Oxfordshire plan is progressed.** Even before the pandemic hit, building rates were slower than envisaged in current local plans. These provided for much higher building rates than previously achieved in response to the Growth Deal and now require unrealistically high rates to meet them (an average of almost 6,300 a year). The priority should be to deliver what is in the pipeline in a sustainable way and further land releases should be contingent on assessing how far these have delivered genuinely affordable housing, infrastructure requirements and met climate change objectives.
14. **POETS consider there should be a further consultation, before the submission document is finalised, setting out the preferred (as revised) amount of housing and employment and the preferred locational strategy for accommodating them.** This is necessary as the consultation document does not give a preferred growth option or information as to how the figures for the overall levels of housing and employment growth will be finalised. Without these there can be no genuine or effective public consultation.

## Spatial strategy

15. **POETS consider that in the absence of knowing the overall amount of growth being planned, it is difficult to comment in any meaningful way on a possible spatial strategy.** However, we support urban renewal and the redevelopment of brownfield sites, subject to environmental constraints and provided they are easily accessible by public transport or active travel modes. Covid has changed, probably permanently, the relationship between home and work and will reduce the need for office space. It has also accelerated the trend towards on-line shopping and the decline of the retail sector in urban areas. These changing patterns of office and retail activity give scope for more housing

<sup>5</sup> See government guidance on the standard methodology for assessing housing needs <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>6</sup> Social Market Foundation 'Baby Bust and Boom' September 2021 <https://www.smf.co.uk/baby-shortage-could-spell-economic-stagnation-for-uk/>

in urban areas (particularly in Oxford) that will be enabled by changes to permitted development rights allowing conversion of other uses to housing without the need for planning permission<sup>7</sup>. Similarly, there may be scope for reallocating some employment land for high quality, well-designed housing or mixed use. This applies particularly to Oxford where there is a major imbalance between jobs and housing.

## Additional comments on themes and policies

16. When commenting on the proposed strategic vision for Oxfordshire 2050, POETS said it 'reads more like a public relations pitch rather than a serious attempt to address many problems in Oxfordshire'<sup>8</sup>. This failure to recognise the negative effects of growth and the increased pressure it will put on the natural resources and infrastructure of the county has been carried through to the policy themes and resulted in policies which are generally fairly meaningless. They are peppered with phrases such as 'take account of', 'development would be expected to', 'consider measures to', 'establish a framework for'. If the plan is to achieve its environmental objectives it will need to contain policies which make it clear that developments will not be permitted unless requirements are met.
17. The policies seem in many ways just a list of aspirations; to be credible they need be clearer on how and by whom they will be implemented and where relevant, how the proposals will be funded. The plan should be much more transparent and informative on the implications of growth so that informed judgements can be made on what is the best way forward for Oxfordshire. The section on Green Belt policy is a good example of this, it disguises the possibility of taking further land out of the Green Belt by saying the plan will focus on Green Belt enhancements. But it gives no indication of who will carry out these enhancements and how they will be funded.

## Specific Themes

We comment below on 3 of the 5 themes, as these are particularly relevant to the overall vision and strategy of the plan:

### Theme 1: Addressing Climate Change

18. The plan should include references to retrofitting and adapting existing buildings which is necessary if the UK is to reach its zero carbon targets. It should establish clear standards for new development that do not include the words 'subject to viability and deliverability testing', which experience has shown that developers use to avoid wider obligations. This is totally inadequate given the crisis we are facing. The climate change section should back-cast, setting out

<sup>7</sup> However, in common with other commentators and the Government's own advisors, POETS have strong reservations about the extension of permitted development rights as it has led to poor living standards and lack of infrastructure provision. Conversion of offices, shops and other buildings should take place as part of a planned approach which provides good quality housing, attractive urban environments and does not risk "hollowing out" town centres.

<sup>8</sup> See POETS Responses to Oxfordshire Strategic Vision, January 2021

<https://www.poetsplanningoxonuk/poets-oxfordshire-strategic-vision-consultation-response-010121.pdf>



clearly how carbon emissions will be reduced by specific amounts and at what dates. Regrettably everything in the plan is about 'contributing to the reduction of carbon emissions' rather than setting out clear measures to actually reduce them. The plan should be transformational about climate change and include a positive policy about locations for large scale renewable energy facilities. It should also contain more specific policies to address the need to adapt to climate change that is already inevitable, including such things as ensuring the resilience of critical infrastructure and tackling the problems of living with higher temperatures.

#### Theme 4: Planning for Sustainable Travel and Connectivity

19. To be transformational about climate change the plan should state that no new 'expressway' or major roads would be built in Oxfordshire. The Government's Transport Decarbonisation Plan recognises that we will need to increase walking and cycling rates and use of public transport, while reducing the level of private vehicle trips, particularly within urban areas. Oxfordshire's forthcoming Local Transport & Connectivity Plan will need to enshrine these principles and take a bold approach to deliver on them.
20. There can be no place for further development located in areas of the county remote from frequent public transport and other essential services, which sadly has been repeatedly permitted in recent years and incorporated in recent local plans. Irrespective of the adverse transport and environmental impacts of such development, infrastructure and other service provision intended to mitigate their effects, is always inadequate and this contributes to the rising backlog in road maintenance and service provision.

#### Theme 5: Creating jobs and providing homes

21. Policy option 23 - Given the changing working patterns and the imbalance of employment and housing POETS oppose a policy which contains an overall presumption against the loss of economic assets. We support the planned reuse or redesignation of employment land, particularly in and around Oxford for housing or mixed-use developments. Similarly, in policy option 24 on town centre renewal, housing should be included in the list of supported new uses.
22. Policy option 30 - The need for affordable homes is one of the most important challenges facing Oxfordshire yet the plan is extremely vague on this. It sets out future numbers of housing required based on estimates of need yet makes no mention of what type of housing is required to meet those needs. The plan should give clarity on the amount and type of affordable housing needed overall and how it will be achieved. The government's definition of affordable housing at 80% of market rates does not provide affordable homes in Oxfordshire and the plan should set its own measure for the county. The plan should set an overall target based on a needs assessment for genuinely affordable housing and contain policies to ensure that open market housing is not built in its stead to meet imposed housing targets. Oxfordshire should not accommodate housing growth that fails to meet the needs of those living and working in the county.