

Policy and Programmes

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OXFORDSHIRE PLAN REGULATION 18 (PART 2) CONSULTATION

South Oxfordshire District Council is eager to reflect on the consultation feedback from stakeholders and members of the public about the draft Oxfordshire Plan and other documents. In advance of that, our response provides feedback on the policy options and spatial options and to what extent we think that they deliver our priorities in our Corporate Plan¹ (2020-2024).

Policy Options

We welcome policies within the Oxfordshire Plan 2050 plan that embed sustainability into spatial planning, specifically policies that:

- Improve overall health and wellbeing and reduce inequalities, including requiring healthy place making and high-quality design into the masterplanning process at an early stage,
- Support net zero targets and achieve net zero carbon homes. If there is to be a net zero-carbon definition for Oxfordshire, it is needed soon to enable local plans to progress. Further consideration could be given to climate resilience and strategic aims to adapt to the effects of global heating, flood risk solutions for instance,
- Promote the circular economy, and an economy which is clean, prosperous, diverse, inclusive, successful and sustainable which is reflected in the Guiding Principles. Further consideration could be given to promoting higher density housing in town/village centres, especially above shops where they bring life to otherwise deserted centres,
- Seek to maximise levels of truly affordable housing across Oxfordshire on residential sites as stated in Policy Option 30,

¹ [<https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/11/SODC-Corporate-Plan-2020.pdf>]

- Seek the most stringent environmental standards. The flood risk policy should be justified to explain why standards apply only to major development. Also consider how retrofit of properties could be steered at a strategic level,
- Utilise Natural Capital baseline mapping, and this needs speedy progress. In addition, a Local Nature Partnership (LNP) for Oxfordshire has been set up, although the LNP has had no influence on the Oxfordshire Plan 2050 to date. Close engagement with the LNP will be essential to inform the Oxfordshire Plan and the establishment of the Nature Recovery Network. We are keen to support in principle the creation of new protected areas in Oxfordshire,
- Seeks enhancement and consider possible extension of the existing Green Belt,
- Moves towards a net zero-carbon emissions transport network with more, better, and better maintained cycle and walking routes to help improve health and well-being,
- Promote funding of infrastructure to support planned development throughout the Plan. It will be important to utilise OXIS to inform the Regulation 19 policies where appropriate; We support policies seeking to:
 - phase development to align with any necessary wastewater treatment work and associated infrastructure upgrades
 - consider the land use and planning elements of future health reorganisations
 - ensure development is well-related to existing or planned sustainable transport infrastructure especially rail services
 - ensure green or blue infrastructure will be incorporated as an integral part of new development,
- Recognises commitments made to housing supply in current Local Plans, and
- Seeks urban renewal.

Spatial Strategy Options

Spatial Option 1 could result in further expansion of existing settlements which is more likely at the urban fringes. There are limited sustainable options for development in the settlements already delivering significant growth. It could erode rural character and a town or larger villages relationship with the surrounding countryside, including AONB. This strategy makes it difficult to improve access to green spaces in and around our towns and larger villages as well as making it difficult to reinforce access to nature as a priority for community well-being. There is little that this strategy offers to reduce carbon impacts.

Spatial Option 2 promotes urban intensification within the City of Oxford and new or extended urban extensions on the edge of the City. The continued promotion of growth around the City, within the Green Belt, is not a sustainable longer term solution for growth and cannot be supported. However, we support the benefits that the option brings in terms of urban intensification such as accessibility to sustainable transport.

Spatial Option 3 promotes new growth in the most sustainable transport corridors. This strategy could help deliver net zero carbon ambitions by helping to decarbonise the transport network. This strategy could make it possible for growth to focus on public health well-being and sustainability outcomes and potentially 20-minute neighbourhoods approach. This option would need to be complemented by the promotion of urban renewal.

Spatial Option 4 - There is already an element of this spatial pattern being delivered by several of the strategic sites within our current Local Plan. The option could be limited by available sustainable options for development that could deliver it. The existing network of business and science parks in the District vary from Culham, Didcot and market towns. These locations have their own constraints.

Spatial Option 5 will require significant investment for development of scale (like for a broad location). The option currently lacks focus on the achievement of meeting local housing need and affordability, as well as development of sustainable homes and net zero carbon targets.

Oxfordshire Growth Needs Assessment (OGNA)

Based on the published OGNA, a housing requirement reflecting the lowest level from the range presented will generally be more effective in ensuring that the Council's priorities are reflected in the Oxfordshire Plan. A higher housing requirement threatens to undermine the Council's priorities, as expressed in its Corporate Plan and its carbon targets.

We recommend that it will be necessary to keep the OGNA up to date, to reflect updated evidence from ONS, Oxfordshire County Council and feedback from consultation. In particular the OGNA assumes that migration will continue at past levels. Migration may yet be influenced by the OxPlan Arc Framework; however, we ask that consideration is given to whether there is scope to test high and low migration scenarios, in the same way that high and low employment has been tested.

We thank you for the opportunity to comment on the Oxfordshire Plan 2050.

Yours Sincerely,

Harry Barrington-Mountford
Head of Policy and Programmes