

Divisions Affected - All

CABINET

21 September 2021

Oxfordshire Plan 2050 Regulation 18 (Stage 2) Consultation: OCC Draft Response

Report by Corporate Director Environment and Place

RECOMMENDATION

1. The Cabinet is RECOMMENDED to consider the draft OCC response to the Oxfordshire Plan Regulation 18 (Stage 2) consultation and suggest changes to be made to the response as necessary.

Executive Summary

2. As part of the Oxfordshire Housing and Growth Deal, the Growth Board agreed that the city and district councils would prepare a county-wide strategic plan for Oxfordshire: the Oxfordshire Plan 2050. The Plans aim is to:
 - Set out the numbers of new housing to be built in Oxfordshire up to 2050;
 - Establish the broad locations for growth, i.e., the spatial growth options.
3. A report on the draft Plan was considered by Cabinet at their meeting on 20 July. Cabinet resolved to:
 - a) **Consider and agree the process for the Oxfordshire Plan Regulation 18 (Part 2) document for public consultation commencing on 30 July;**
 - b) **Further consider the Plan at its meeting on 21 September after an all-member seminar, with a view to making formal representations on the Oxfordshire Plan Regulation 18 (Part 2) by the closing date of 8 October 2021.**
4. Subsequently, an all-Member virtual seminar was held on the evening of 20 July. A further meeting with Cllr Enright was held on 27 July to discuss the general approach for an OCC formal response.
5. The Plan document at Annex 1 is consulting on a range of preferred and reasonable alternative policy options and five broad spatial options for future growth in Oxfordshire, as well as three option for the levels of new housing

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growth. The results of the public consultation will feed into a further round of public consultation (Reg 19) in the spring of 2022. The Reg 19 consultation will set out the preferred options for policies, spatial locations and levels of new growth.

6. The draft Plan document contains five Themes within which sit a range of policy proposals. There are 32 preferred policies.
7. The draft Plan will not identify specific sites for new development. It will however outline five spatial options (or broad locations) for future growth.
8. The draft response at Annex 2 outlines how the preferred policy options contained within the Plan correlate to the county councils agreed priorities and highlights some key points raised by various county council members, officers and teams in relation to the plan policies, text and spatial options.

Background

9. The Oxfordshire Growth Board ('the Board') was established in 2014 as a Joint Committee¹ of the six councils of Oxfordshire, together with key strategic partners. The Board's establishment was premised on strengthening partnership arrangements across Oxfordshire for pragmatic working on key strategic issues. It has successfully done this by overseeing the delivery of cross-county projects that the councils of Oxfordshire were seeking to deliver in a collaborative way – between local authorities, the Local Enterprise Partnership and wider partners and stakeholders².
10. As part of the Oxfordshire Housing and Growth Deal, the Growth Board agreed that the city and district councils would prepare a county-wide strategic plan for Oxfordshire: the Oxfordshire Plan 2050. The Plans aim is to:
 - Set out the numbers of new housing to be built in Oxfordshire up to 2050;
 - Establish the broad locations for growth, i.e. the spatial growth options.
11. The timetable for the preparation of the Plan is:
 - a) 30 July to 8 October 2021 – Oxfordshire Plan 2050 (Reg. 18 part 2) consultation
 - b) Spring 2022 - Consultation on Submission (Draft) Plan (Reg. 19)
 - c) September 2022 – Submission to government
 - d) November / December 2022 – Examination
 - e) February / March 2023 – Inspector's report
 - f) May/ June 2023 – Adoption

¹ Under s101 (5), 102 Local Government Act 1972 (LGA 1972) and s9EB Local Government Act 2000 (LGA 2000) and pursuant to the Local Authorities (Arrangement for the Discharge of Functions) (England) Regulations 2012.

² As a Joint Committee, the Board may discharge executive functions if delegated to it by each constituent local authority, but each constituent authority retains the ability to exercise all executive and non-executive functions generally and specifically in relation to economic development including where applicable provision of housing, strategic spatial planning and strategic transport planning.

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12. A report on the draft Plan was considered by Cabinet at their meeting on 20 July. Cabinet resolved to:
- a) **Consider and agree the process for the Oxfordshire Plan Regulation 18 (Part 2) document for public consultation commencing on 30 July;**
 - b) **Further consider the Plan at its meeting on 21 September after an all-member seminar, with a view to making formal representations on the Oxfordshire Plan Regulation 18 (Part 2) by the closing date of 8 October 2021.**
13. Subsequently, an all-Member virtual seminar was held on the evening of 20 July. A further meeting with Cllr Enright was held on 27 July to discuss the general approach for an OCC formal response.
14. Since all the local authorities agreed the Plan during meetings during July, the Plan is now out for public consultation until 8 October. The Plan is at Annex 1.
15. The Plan team have developed a number of ways for respondents to submit their comments on the Plan, including via the Oxfordshire Open Thought website. Alternatively, respondents can use a submission form. For the OCC response, the submission form has been used. Responses from various county council officers have been submitted to the Strategic Planning Team and they have been included in a draft response letter to the Oxfordshire Plan team and is attached at Annex 2.
16. It should be noted that different officers and teams have made comments on the same policy option. However, it is important to capture their detailed considerations that can then be taken forward to the next phase of the plan process.
17. We have looked at the Oxfordshire Plan preferred policy options and matched them to the County Councils priorities which were agreed by Cabinet on 20 July 2021. The priorities are:
- Tackle the Climate Emergency through rapid decarbonisation, proper accounting of carbon emissions and ambitious targets, as well as supporting climate resilience.
 - Tackling inequalities and providing opportunities for everyone in Oxfordshire to achieve their full potential.
 - Prioritisation of wellbeing – improved outcomes for residents and improved air quality and access to libraries, cultural facilities and the arts
 - Review and reform of the social care system to prioritise end users and carers, with a focus on co-operative and community provision of social care, helping those who want to stay in their own homes
 - Increased investment in an inclusive, integrated, county-wide active and sustainable travel network fit for the 21st century to improve choice and reduce car journeys across the county
 - Improved access to nature and green spaces for all communities, and landscape-scale nature recovery across the county.

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- Supporting all our children and young people to achieve improved health, wellbeing and educational outcomes; improved provision for children with additional needs; all decision-making to have regard to impact on young people and future generations.
- The creation of a resilient local democracy, where decisions are devolved to the lowest possible level and residents are meaningfully involved in the decisions that affect their lives.
- Support for local employment and businesses, working with partners to make Oxfordshire a centre for green and sustainable technologies through a local 'Green New Deal'. We will use our purchasing power and contracts to maximise benefit to local employment and businesses.

Key Issues

18. The Plan document is consulting on a range of preferred and reasonable alternative policy options and five broad spatial options for future growth in Oxfordshire, as well as three options for the levels of new housing growth. The results of the public consultation will feed into a further round of public consultation (Reg 19) in the spring of 2022. The Reg 19 consultation will set out the preferred options for policies, spatial locations and levels of new growth.

The policy themes

19. The draft Plan document contains five Themes within which sit a range of policy proposals:

- Theme One: Addressing climate change.
- Theme Two: Improving environmental quality.
- Theme Three: Creating strong and healthy communities.
- Theme Four: Planning for sustainable travel and connectivity.
- Theme Five: Creating jobs and providing homes.

20. There is a total of 32 policies in the draft Plan. A preferred policy option is set out with a number of reasonable alternative options.

21. The Themes outlined above have a clear alignment with the county council priorities outlined in paragraph 9 above.

Spatial options

Principles underpinning all the spatial strategy options

22. All options must help deliver the Strategic Vision – though each will do this in different ways and to varying degrees because each is based on a different key driver for transformation. All options will make effective use of land by planning positively for reuse of previously developed or brownfield land, including under-utilised land & buildings as urban regeneration schemes.

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23. They will prioritise the environment as a common thread that flows from the Oxfordshire Strategic Vision. This includes climate change, nature recovery, natural capital and enhanced resilience.
24. All will support Oxford as the key driver for growth within Oxfordshire and will support the priorities within the emerging Spatial Framework for the Oxford-Cambridge Arc.
25. It is not anticipated at this stage of consultation that one option can accommodate all of Oxfordshire's growth. None of the options is likely to provide 'the answer' – more likely that the preferred strategy at Reg 19 stage will comprise components from different options to deliver the overall long-term strategy and outcomes.
26. The draft Plan will not identify specific sites for new development. It will however outline five spatial options (or broad locations) for future growth:
- Option 1: Focus on opportunities at larger settlements and planned growth locations
 - Option 2: Focus on Oxford-led growth
 - Option 3: Focus on opportunities in sustainable transport corridors & at strategic transport hubs
 - Option 4: Focus on strengthening business locations
 - Option 5: Focus on supporting rural communities
27. All the options outlined above have their own particular opportunities and challenges (articulated in the Plan) and it is recognised that the final preferred option (to be set out at Reg 19 stage) may be a combination of more than one option. It is worth noting that a high-level transport assessment of each option is being carried out as part of the evidence base for the draft Plan.

Levels of new housing growth

28. The core team have undertaken an assessment of the growth needs of Oxfordshire up to 2050, the Oxfordshire Growth Needs Assessment (OGNA), which will be published alongside the Plan given its important role as an evidence document. It sets out three scenarios for housing need:
- One that is based on the Government's standard methodology,
 - A mid-range option, and
 - A higher one that factors in additional economic growth.
29. The decision on which level of growth will be taken around Christmas 2021 to inform the Regulation 19 stage draft plan. In setting the level of planned housing provision, the OGNA will be one of the factors considered alongside a number of others.
30. The strategy seeks to take account of the five District Local Plans that have been adopted in Oxfordshire and take account of the growth already committed in each District, totalling circa 75,000 houses. The consultation Plan clarifies that the housing need assessment is just a starting point, the current Local Plan

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growth up to 2031/35/36 has to be taken into account and leaves a smaller 'residual' figure of new development to be planned for in the Oxfordshire Plan.

OCC draft response to the Oxfordshire Plan 2050 Regulation 18 (Stage 2) consultation

31. The draft OCC response to the consultation is in letter form at Annex 2. Key general points are:

32. We are pleased that the Oxfordshire Plan 2050 is, along with the Strategic Vision for Long Term Sustainable Development, a key document that will continue to drive all six local authorities in the county to work in partnership to deliver good growth in Oxfordshire for the next 30 years and beyond. We consider that the Plan will give long-term certainty over the future sustainable development of the county for residents and businesses.

33. We welcome policies within the draft OP2050 plan that:

- Strengthens and drives policies for net zero carbon homes, specifically construction and design standards that reduce energy demand in line with the energy hierarchy, and the use of gas boilers.
- Ensure for spatial planning to accelerate and drive the UK's transition to a zero-carbon energy system
- Enable greener, more inclusive strategic infrastructure provision, including energy and transport networks
- Make provision for tree planting in urban areas as part of healthy place-shaping, urban design and biodiversity net gain.

34. Whilst we support the five Themes, we would urge that work is undertaken to ensure that there is no conflict between the five themes and the policies contained within them. For example, we would not wish to see the drive towards a zero-carbon economy have a disproportionate negative impact on residents in outlying communities or with limited resources who need access to affordable active and public transport options.

35. We note and support paragraphs 37 to 48 which outlines the important relationship between the Oxfordshire Plan and the Oxford to Cambridge Arc Spatial Framework, and in particular paragraph 46 which states:

The respective timetables for the Oxfordshire Plan and the Arc Spatial Framework mean that the Oxfordshire Plan – together with the Strategic Vision – will be able to help ensure that Oxfordshire has a strong voice in the development of the Arc Spatial Framework and that its interests are taken into account. Likewise, as work on the Arc Spatial Framework gathers pace, it will help inform the choice of options to be considered at the next stage (Regulation 19) of the Oxfordshire Plan process.

36. We would also like to note that Oxfordshire is the only area in the Oxford to Cambridge Arc that is embarking on a long term, strategic Plan for the county, and is therefore in a good position to influence and drive ambitious Arc Spatial

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Framework emerging policies to allow the move to a zero-carbon economy and society to become a reality.

37. We are pleased to see a Theme that is devoted to addressing climate change. The recent extreme weather events and the publication of the latest IPCC report has highlighted the need to take a fresh and holistic approach across the county to make sure we are doing everything we can to address this crisis. The policies on sustainable design and construction, energy, water efficiency and flood risk are welcomed.
38. The Circular Economy should be included at the highest level as it's such a cross cutting theme that impacts every area, not one on its own, and then incorporated into the Policies as much as possible. Ideally what we would like to see in the Plan is a drive towards and commitment to the Circular Economy alongside an explanation of what this is and how it fits across the Themes of the Plan.
39. We support Policy Option 18: Sustainable Transport in New Development as being in line with the hierarchy as set out in the emerging Oxfordshire Local Transport and Connectivity Plan (LTCP) namely that in new development:
 - Reduce the need to travel in the first place by ensuring that high quality digital connectivity is provided
 - Secondly planning for sustainable travel modes - ensuring that new development is primarily designed to enable movement by active travel and public/shared transport, and that sites are well connected to surrounding sustainable transport networks
 - Finally providing for zero emission vehicle use - ensuring that any essential vehicle travel for people and goods is prioritised for zero carbon emission vehicles, with adequate charging and other supporting infrastructure provided.
40. It is encouraging that the plan supports the establishment of a Nature Recovery Strategy and recognises the importance of the draft Nature Recovery Network as a valuable evidence base which will be used to achieve environmental benefits required under strategic policy. As an overarching policy this can permit change and adaptation over time, as the evidence base increases.
41. Stronger wording in some parts of the plan would be beneficial, for example para 211 states that 'net gains through planning are likely to be desirable', this needs to ensure commitment and recommended wording would be 'net gains through planning will be necessary'.
42. From a broad climate perspective, we think the plan is not really putting climate change impacts in the frame, though the emphasis on decisive action to mitigate and even reverse climate change and biodiversity loss is very encouraging.
43. Given recent climate events across the Globe, and the findings of recent research, including the IPCC report, a prudent long term strategic plan would probably at least lay out a set of principles designed to promote layers of

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resilience from individual building level right up to County and region. That might include:

- Conscious and planned building of community networks and strengthening of communities.
- Public education, training and support in building skills and knowledge base
- Built-in system / supply chain redundancy, preference for local sourcing, and resilience by design in food, water, power supplies at each level (local, district, county, nation). This would include deliberate planting of trees and shrubs with edible fruit/nuts within and around settlements, support for allotments, smallholdings.
- Sustained support for developing circular economy, reducing dependence on resources from external sources.
- Building-level resilience including shutters to block sunlight in extreme heat events, correct orientation of new builds, measures to prevent damage from flash flooding, designed resilience to high winds.
- Risk-based zoning of development and rigorous enforcement (including for example a complete and absolute block on building on flood plains and areas liable to flood in extreme circumstances).
- Hardening and protection of critical infrastructure.
- Proactive disaster prediction and emergency planning, down to house / street level.
- Universal deployment of nature-based / agroecological defences against extreme climate events.

44. More detailed officer comments are included in the draft letter at Annex 2.

Financial Implications

45. There are no budgetary implications for the county council. Work on the OP2050 is undertaken within existing officer time.

Comments checked by:

Rob Finlayson, Finance BP (Communities and C,OD & CDAI)

Legal Implications

46. There are no legal implications for the county council. The Plan is a strategic plan for the four districts and the city council.

Comments checked by:

Christian Smith, Principal Solicitor Contracts

Equality & Inclusion and Sustainability Implications

47. The draft Plan contains the following Objectives that seek to ensure as far as possible Oxfordshire's residents are able to lead productive and healthy lives:

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- To demonstrate leadership in addressing the climate emergency by significantly reducing greenhouse gas emissions.
- To conserve and enhance Oxfordshire's historic, built and natural environments, recognising the benefits these assets contribute to quality of life, local identity and economic success.
- To protect and enhance Oxfordshire's distinctive landscape character, recreational and biodiversity value by identifying strategic green and blue infrastructure, improving connectivity between environmental assets and securing a net gain for biodiversity.
- To improve health and wellbeing by enabling independence, encouraging active and healthy lifestyles, facilitating social interaction and creating inclusive and safe communities.
- To sustain and strengthen Oxfordshire's economic role and reputation by building on our key strengths and relationships.
- To ensure that the benefits and opportunities arising from Oxfordshire's economic success are felt by all of Oxfordshire's communities.
- To meet Oxfordshire's housing needs, including affordable housing, and to ensure that housing delivery is phased appropriately to support the needs of our communities.
- To ensure that new housing is flexible to meet the varied needs of people through all stages of life.
- To deliver high quality, innovatively designed development that ensures efficient use of land and resources.
- To reduce the need to travel and to support people in making sustainable transport choices by providing inclusive, integrated, safe and convenient pedestrian, cycle and public transport infrastructure linking communities.
- To ensure that communities are digitally connected and that innovative technologies are supported.

Communications

48. The Oxfordshire Plan 2050 has a website <https://oxfordshireplan.org/> where the Regulation 18 part 2 consultation documents will sit. The website will be the key tool for the engagement during the consultation period.

49. The website will contain:

- Overview text about the Oxfordshire Plan, stage reached and consultation purpose.
- A consultation response form, including a series of questions included.
- A summary leaflet.
- A downloadable Regulation 18 (Part 2) consultation document.
- The ability to access the key accompanying documents that the Councils will receive.

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- Link to the supporting evidence including the Sustainability Appraisal (SA) & the Habitats Regulations Assessment (HRA).
- Link to the OGNA report
- Link to secondary evidence such as the Local Transport & Connectivity Plan (LTCP) and the OXIS which supports the Oxfordshire Plan but which is being consulted upon separately.
- Text confirming that the County Minerals and Waste Plan is separate.
- A download form for proposals to be submitted by site promoters.

50. Online events:

- District-based webinars: 2 per district, 1st to take place in 3rd week of August (from 16th), 2nd to take place in 3rd week of September (commencing 20th)
- CPRE webinar date confirmed as 19th August.
- A number of specialist webinars covering Environment and Developers. Each of these is to take place in the week commencing Tuesday 31st August.
- OxLEP Business events: 2 events, one w/c 19th July and one in mid-September
- Thames Valley Chamber of Commerce: July 6th.

The future timetable

51. The scale of the work undertaken at the Regulation 18 (Part 2) stage puts the plan-making process in a good position to meet the future timetable that was agreed with MHCLG in February 2021.

NAME: Bill Cotton, Corporate Director Environment and Place

Annexes: Annex 1 - Oxfordshire Plan 2050 Reg 18 (Stage 2) document.
Annex 2 - Oxfordshire County Council draft response to the OP2050 public consultation.

Contact Officer: Dawn Pettis, Strategic Planning Team Leader,
07771983395

September 2021