Oxford Local Plan 2040 – Preferred Options

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

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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.

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1. POETS support the three over-arching themes of addressing climate change, reducing inequalities and promoting the 15-minute city (provided the latter is not used to justify a failure to invest in good public transport and cycle routes across the city) and we welcome many of the laudable policies arising from them. A key feature of the local plan must be to actively address the imbalance of housing and jobs in Oxford. We support policy options that would enable housing to be developed on employment sites as this would help reduce problems created by significant in-commuting and help tackle climate change. There should be a thorough assessment to see whether there are opportunities for redeveloping all or part of employment sites for housing. The use of vacant sites should be prioritised for affordable housing. We support the provision of as much accessible and genuinely affordable housing as possible (particularly through social rent) providing it will remain affordable in the long-term. In this context the provision of 25% of the affordable housing as low-cost market homes for first time buyers is not supported if it is classed as part of the affordable housing quota.

2. POETS have fundamental concerns about how the city council can proceed with its local plan in the absence of a strategic plan for the county or the agreement of the surrounding district councils on the amount and broad location of development. It is regrettable that joint work on the Oxfordshire Plan to 2050 has stalled, and progress on the city local plan should not pre-empt decisions that will be made by the other district councils in Oxfordshire. The county functions as a city region, it should be planned as such and not in a piecemeal way.

3. It should not automatically follow that the surrounding districts will provide in full for the housing and employment that cannot be met in the city. Both the city council and surrounding district councils have an active role in the duty to cooperate. While seeking to maximise the delivery of housing within its boundaries, including opportunities for high quality conversion of office space post-Covid demand reductions, the city council should also assess opportunities to make more efficient use of the remaining employment land. At the same time, the surrounding districts have a role to play in providing for such things as accessible green space for both their own and the city's residents.

4. POETS would strongly oppose a plan based primarily on achieving traditional economic growth of Gross Domestic Product (GDP),which includes such things as increased consumption of fossil fuels. We recognise that Oxfordshire has a global reputation for learning, research and innovation, and must contribute to the success of the national economy by playing to its strengths. But we do not accept this means significant old-style economic growth, particularly given the overriding importance that should be attached to the climate and biodiversity emergencies, problems of water supply and sewage disposal, and the need to level up opportunities within the UK. There

are also huge uncertainties resulting from the pandemic, Brexit, the recent 'mini-budget', the cost of living crisis and the looming world economic recession. Furthermore, ambitions to grow Oxford's economy significantly would harm the environment and character of the county, require major releases of greenfield land and investment in infrastructure, worsen traffic congestion and CO2 emissions through even higher levels of commuting, and require the excavation of many millions more tonnes of sand and gravel from the river valleys and limestone from the Cotswolds.

5. POETS strongly disagree with the unrealistically high figures in the interim report on employment land needs, prepared by Lichfields. Paragraph 6.6 concludes that the business-as-usual trajectory (i.e. pre-Covid and pre-Brexit) and the transformational strategy, requiring 296,270 and 412,310 m^2 of additional employment floorspace respectively, provide the most balanced view of future requirements. This is despite their scenario based on the additional employment space provided in the city between 2011 and 2021 of 45,710 m^2. The almost tenfold difference between the highest and lowest projections calls into question the validity of basing the plan on the conclusions of consultants. Furthermore, 79% of the highest figures are for office and research and development, where, due to Covid, office staff are continuing to work from home, thus reducing the need for additional floor space.

6. The city council has said it will commission a new housing needs assessment for the city. POETS have concerns about the adjustments made to official projections and the standard method in the now generally discredited Oxfordshire Growth Needs Assessment. To be acceptable a future assessment for the city must be open and transparent and not artificially inflate the figures. Any consultants used must be demonstrably independent and not reliant on the development sector for most of their income. The assessment must also be realistic in view of financial and supply constraints - rising interest rates for mortgages, cost of living increases, continuing high house prices, falling wages in real terms, rising costs of materials, difficulties in the supply chain and labour shortages will all dampen demand. Further cuts in public spending will make it even more difficult for local authorities and housing associations to invest in new house building, especially given the high costs of maintaining and improving existing properties. Contrary to popular belief building more houses will not reduce house prices, and it is a very blunt instrument for securing genuinely affordable homes. The background paper on overall housing numbers indicates that of the 2,690 homes built in Oxford 2016 – 2021 only 390 or 14.5% were 'affordable' by the government's definition (80% of market prices or rents), which in reality is not affordable by those in most housing need.

7. To ensure genuine and effective public consultation there must be a further consultation before the submission document is finalised, setting out the amount of housing and employment needed and the preferred locations for accommodating additional development. This should be done in cooperation with the district councils.

Key Recommendations

a) POETS consider a key feature of the local plan must be to actively address the imbalance of housing and jobs in Oxford. We support policy options that enable housing to be developed on employment sites, and prioritise the delivery of genuinely affordable housing, particularly on vacant sites (paragraph 1 above).

b) The city council must engage with the other district councils to jointly agree the broad amount and location of development in Oxfordshire. The Oxford plan should not pre-empt the decisions that will have to be made by the other district councils, and it should not automatically follow that those councils will provide in full for housing and employment which the city council considers cannot be met in its area. The duty to cooperate works both ways (see paragraphs 2 and 3 above).

c) POETS would strongly oppose a plan based primarily on achieving economic growth as measured by GDP, and the use of the unrealistically high figures in the interim report on employment land needs, prepared by Lichfields. This is not an acceptable basis for planning further land releases for housing and employment (see paragraphs 4 and 5 above).

d) A future assessment of housing need must be open and transparent, and not artificially inflate the figures. It must also be realistic in view of financial and supply constraints. Any consultants used must be demonstrably independent and not reliant on the development sector for most of their income (see paragraph 6 above).

e) There must be a further consultation before the submission document is published, setting out the amount of housing and employment, and the preferred locations for development (see paragraph 7 above).