South Oxfordshire and Vale of White Horse Joint Local Plan 2041:

Regulation 19 Consultation

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

November 2024

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*

South Oxfordshire and Vale of White Horse Joint Local Plan 2041: Regulation 19 Consultation

Summary

1. POETS are generally supportive of the thorough and thoughtful joint plan and consider that merging the two local plans together works well. Our key concern is the inconsistency between the stated objectives to urgently address climate change and safeguarding land for expensive and environmentally damaging road schemes that will encourage car use contrary to more up-to-date and sustainable transport policies.
2. As an alternative the safeguarded road building schemes should be thoroughly reassessed, and there should be a greater emphasis on achieving higher density developments that will better facilitate public transport and active travel.
3. The transport policies, appearing as they do at the tail end of the plan, should be better integrated with the land-use elements. In addition, changes are suggested to strengthen the affordable housing policy.

Chapter 4: Climate change and environmental quality

4. POETS **support** the ambitious policies for climate change and environmental quality in chapter 4. However, we **object** to the lack of any reference to the adverse impact of transport on climate change – a stark omission given that transport accounts for half of all carbon emissions in the two districts.
5. It should be rectified by including early in this chapter policy IN2 on sustainable transport and accessibility and its supporting text from chapter 13. This would help users of the plan see from the start the importance of integrating land-use and transport proposals. As paragraph 13.3 states ‘A key focus in this plan is a new approach to transport’ - it shouldn’t be left to the last substantive chapter to elucidate.

Chapter 6: Housing

6. **Policy HOU1: Support** Although the policy does not seek to meet Oxford’s unmet housing need between 2036 and 2041, paragraph 1.23 of the plan makes it clear that the two districts will begin an early review of the plan to reflect the new national policy direction, address future housing numbers and the new strategic planning arrangements which the government is committed to introducing. This, together with the generous supply of housing land in policy HOU2 and the lack of agreed figures for Oxford’s unmet housing need, leads us to support policy HOU1. In our view adopting the draft plan is the best way of establishing a sound policy framework and delivering the housing currently required to 2041.

7. **Policy HOU2: Support** Although the policy identifies land for significantly more homes than are required to 2041 we consider it better to plan the large strategic sites that will last beyond the plan period at the outset.
8. We **support** the deletion of the allocation at the former Chalgrove airfield in the adopted local plan.
9. **Policy HOU3: Object** Relatively small changes could be made to maximise the opportunities to provide much needed affordable homes and ensure consistency with other policies in the plan. These should include the following:
    a) The diagram on page 109 states that four times earnings is generally considered affordable. We consider this is not referenced or robust and could be used by developers to avoid the affordable housing obligations. It should be removed and replaced with the widely recognised measure that households should spend no more than 35% of median incomes in a district on rent or mortgage for their accommodation to be 'affordable';
    b) Criterion 2) should provide for at least 50% of dwellings on-site as affordable homes if they are in South Oxfordshire, and at least 40% of dwellings on-site as affordable homes if they are in Vale of White Horse. Of these at least half of the affordable housing requirement in each district should be social housing for rent. We suggest that to give flexibility across sites and over time, detailed percentage requirements for the other affordable housing tenures should be in supplementary guidance;
    c) Criterion 6) should refer to a minimum of 30% against the market value. This makes it consistent with the definition in the *'Affordable Housing Update: Written Ministerial Statement published on 24 May 2021'*, and doesn't introduce an arbitrary ceiling;
    d) Criterion 11) should state that financial contributions will only be accepted in exceptional circumstances;
    e) There should be an additional criterion to secure the affordable housing for the long term;
    f) Paragraph 6.21: The GLA and Islington have very strong supplementary guidance on viability assessments, and we suggest that South and Vale councils should do the same.
10. **Policies HOU4, LS1 and DE4: Object** These policies should seek to move away from suburban style development and increase housing densities, both to reduce land take and more significantly to reduce dependence on the private car by maximising opportunities for public transport and active travel.
11. The policies should more strongly emphasise the importance of making the most efficient use of land. HOU4 on housing mix and size and LS1 for large scale major sites should refer to policy DE4 on optimising densities. DE4 should also apply to the sites covered by policy LS1. Although local plans should be read as a whole, the policies are so detailed that the lack of references to increasing densities is a regrettable omission.

12. **HOU13: Object** The policy and supporting text are somewhat confusing and cover much of the same ground as HOU12 on rural exception sites. There is no reason why community-led housing should be restricted to small sites, or to rural areas, or to exception sites that wouldn't normally be permitted. Community-led housing can be provided in all settlement types, in empty buildings and on land that is allocated for development. The policy reflects the definition of rural exception sites in the glossary more than it does that of community-led housing. The policy should be redrafted.

Chapter 13: Infrastructure, transport, connectivity and communications

13. **Policy IN2 and supporting text:** Move to chapter 4 for the reasons given in paragraph 2 above.
14. **Policy IN3, IN7: Object** POETS object to the inconsistent approach to safeguarding land for some 15 major road building and improvement schemes, and the urgent need to address the causes of the climate crisis referred to in chapter 4 of this plan.
15. Road building encourages more car use to the detriment of the need to reduce CO_2 emissions, promote public transport and active travel, and stores up bigger problems for the future. Building them will be at the expense of other planning benefits that could be secured including significant investment in public transport and active travel, and desperately needed affordable and zero carbon homes.
16. Given the move away from the predict and provide approach to transport planning we would prefer to see all the safeguarded road building schemes in this policy thoroughly reassessed before land for them is safeguarded.
17. However, we have no wish to delay the plan and if this is not possible before the examination we consider the plan should make the change of approach explicit. For example, paragraph 13.22 could state something along the following lines:

    'The road building schemes were originally identified as being necessary under the 'predict and provide approach'. However, with the new 'decide and provide' approach the safeguarded road building schemes will be thoroughly reassessed to see if they remain appropriate. If not, they will be removed in an early review of the plan'.

18. This helps to reduce the conflict between policy IN3 and chapter 4, explain how the new approach to transport (highlighted as a key focus of this plan) is to be realised, and justify the reason why an alternative options study is to be undertaken before any delivery of a safeguarded scheme.
19. In particular we object to the HIF1 road schemes (the Didcot to Culham river crossing, the Didcot Science Bridge, the Clifton Hampden bypass and the A4130 widening) which will be costly, risky and environmentally damaging. It's a short-term approach that will bring only ten years' congestion relief at which time traffic problems will be very much harder to address.

20. However, much will depend on the outcome of the planning application being determined by central government. If refused, the schemes should be removed from the safeguarded policy and sustainable proposals developed by the three councils. Even if the highway schemes are permitted, we consider it important - particularly in view of the climate crisis, the technical difficulties of building the roads, the uncertainties around costs and pressures on local government budgets - that the councils reconsider whether to go ahead with them.
21. There is a better way of planning transport that is more sustainable in the long term. Together with the Oxfordshire Roads Action Alliance and the Joint Parishes, POETS are working up suggestions for a better alternative to HIF1 which we will be submitting to the district and county councils in the next couple of weeks.
22. In this context, we consider that land for the Garden Line (identified in the Didcot Garden Town Delivery Plan 2017) should be safeguarded in the plan pending the comprehensive reassessment advocated above. This predominantly off-road cycle and pedestrian route connecting Harwell Campus and Culham Campus via Didcot town centre, has considerable potential to encourage more sustainable travel. The safeguarded route should be based on that shown in the Delivery Plan (9.3.7) but extended in the north to Abingdon.
23. **Policy IN7: Support** We are pleased to see the statements in paragraph 13.51 that safeguarding land for the proposed reservoir is not evidence that it is supported by either council; and that neither council supports it. We also oppose the reservoir but recognise that a planning application will be determined by central government. In this context we welcome the very useful range of design and environmental considerations that should be taken into account when determining an application.