

Policy and Programmes

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OXFORDSHIRE PLAN REGULATION 18 (PART 2) CONSULTATION

Vale of White Horse 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:

- Support net zero targets and achieve net zero carbon homes and realise the Oxfordshire Strategic Vision. We would encourage retrofit of existing homes to reduce carbon emissions to also be included in the Plan and that the Regulation 19 Plan makes it clear that all planning policies need net zero to be the starting point,
- Help the world in its critical response to the climate emergency and efforts towards carbon neutrality,
- Seek an effective county-wide strategic water efficiency policy,
- Support renewable energy supply consistently through Policy options 1 (Sustainable Design and Construction), 2 (Energy), 14 (Health Infrastructure), 23 (Protection of Economic Assets), 25 (Visitor Economy), 26 (Culture and Arts), 27 (Meeting Skills and Education Needs),
- 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:

¹ <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2020/11/VOWH-Corporate-Plan-2020-2024.pdf>

- 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,
- Move towards decarbonising the transport network and reduce the need to travel, with more active travel and participation,
- Seek to maximise levels of affordable housing across Oxfordshire; However we ask that consideration is given to the need for a strategic policy on key worker housing,
- Make people's lives healthier including delivering active travel opportunities, also policies that give careful consideration of the effect of air pollution on the lives of people,
- Recognise commitments made to housing supply in current Local Plans, and
- Seek urban renewal. However, we would propose the value of brownfield sites and how they can play a strategic role in delivering development should be considered throughout the document. We are keen to support the promotion of densification, especially in more urban parts of the county.

We are keen to stress the importance of the Oxford Green Belt particularly to avoid the coalescence of settlements. Before piecemeal erosion of the existing Oxford Green Belt we would want to see a comprehensive review of the Oxford Green Belt, including full public consultation, with the aim of ensuring that any further changes are in line with the agreed environmental objectives of OxPlan 2050,

Spatial Strategy Options

In line with the agreed Objectives of OxPlan 2050, the siting of future development should prioritise reducing the need for travel. Residents living in the areas around Oxford have seen increased congestion and slower journey times in recent years, as a result of the mismatch between where jobs and homes have been sited. This situation is set to worsen as developments in existing Local Plans go ahead. There should be a strong presumption that new housing will be sited where there is already a high provision of employment, particularly within the City of Oxford, with employment growth sited in areas that already have good provision of housing.

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 successfully in our existing Local Plan strategy. 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 Districts vary from Didcot, Harwell 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 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, in particular 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