Draft response to Oxfordshire 2050 consultation on behalf of the Future Oxfordshire Partnership Scrutiny Panel

Theme One (prepared by Councillor Adam Nell)

1. **Overall Comments:** The consultation document is an excellent piece of work covering a very wide range of subjects and firmly based in supporting evidence provided by other policy documents relating to Oxfordshire, such as the Oxfordshire Growth Needs Assessment. It is co-ordinated with other long-range planning documents including those relating to the Oxford-Cambridge Arc and with national planning policies. It is ambitious in scope and covers a long period into the future. The drafters are to be congratulated on successfully pulling together such a complex, long range document and on co-ordinating it between the different authorities.

2. All comments below should be seen as minor issues with what is essentially a very welcome document and entirely fit to go out to public consultation.

Addressing Climate Change – paragraph 59 of the consultation document onwards

Overview:

3. This section is entitled "Climate Change" but after a general introduction it deals three specific aspects of the public policy response to climate change: Policy Option 1 deals with sustainable buildings, Policy Option 2 with energy production, Policy Option 3 with water efficiency and Policy Option 4 with flood risk. It would be possible to expand the plan's coverage to deal with additional aspects of climate change, including both adaptation to climate change and mitigation of greenhouse gas emissions.

4. A list of additional adaption issues could include: storm damage, changing agricultural crops and needs, changes in natural vegetation, flora and fauna, changes to mitigate the health impacts of extreme heat and many other issues. Many of these are dealt with in passing or elsewhere in the document.

5. A list of mitigation issues could include changing transport technologies to electric drivetrains or other low-carbon drivetrains, the encouragement of energy efficiency in appliances and machines as well as in buildings and structures, alternative sources of industrial heat and process energy, the production and encouragement of green hydrogen and also land use and forestry changes. Many of these are dealt with in passing or elsewhere in the document.

6. A full and structured list of relevant issues can be found in the work of the Climate Change Committee, notably the Net Zero Technical Report published in May 2019 and available at www.theccc.org.uk.

7. It would be helpful if the final Oxfordshire Plan 2050 addressed each of these issues in a systematic way and made explicit co-ordination with other

government documents, including the work of the Committee on Climate Change.

8. As an aspect of this co-ordination, it would be helpful if the final Oxfordshire Plan 2050 could encourage planners and thereby developers, designers, builders and occupiers to **evaluate** different methods of adapting to climate change and/or mitigating climate change in accordance with relevant government guidance. The aim of this would be to encourage them to choose the most cost-effective and least resource-intensive methods, so that expenditure on climate change issues is as efficient as possible in reducing greenhouse gas emissions and in achieving successful adaptations to a changed climate.

Specific Comments:

9. *Paragraphs 63 to 65 would be an appropriate point to make a link to other UK government policies on adaptation to climate change and mitigation of greenhouse gas emissions.*

10. *Paragraphs 67 to 73 deal with many aspects of mitigation of greenhouse gas emissions but do not cover adaptation to climate change as a separate theme.*

Comments and recommendations on individual Policy Options:

Policy Option 01 - Sustainable Design and Construction

11. *Paragraph 87 is clearly a key issue in that it commits Oxfordshire to a whole-life analysis of carbon emissions, including the embodied carbon in materials, the operational energy use of buildings and onsite renewable electricity generation.*

12. *Policy Option 02 – This approach based on whole life analysis is reflected in the wording of Policy Option 01 but there is no detail on the types of carbon offset that might be acceptable or how calculations regarding carbon offsets should be approached. Adding some principles about what counts as an offset might be helpful.*

Policy Option 02 – Energy – paragraph 95 onwards

13. *Paragraphs 116 and 117 – these make repeated reference to "renewable energy" but seem to be talking about renewable electricity.*

14. *Policy Option 02-01 – the wording may need some tweaking:*

- *It refers to the need to "minimise energy demand". The only effective way to do this would be to have no new development at all. The intention is clearly to minimise the energy demand for a given use, not to minimise it overall.*
- *It refers to the need to use "renewable energy where viable". This is not stringent enough as it would permit developments that will last beyond 2050 (when the UK aims to reach an economy with net zero carbon dioxide emissions) to avoid the use of renewable electricity now. There needs to be*

an absolute commitment to using renewable electricity either immediately or before a set date, say 2030.

- *The same confusion between "renewable electricity" and "renewable energy" is seen in the wording here.*
- *The wording requires the use of renewable energy but does not make clear whether this has to be energy directly sourced from a renewable energy site, or whether energy from the electricity grid but with a Renewable Origin Certificate is permissible.*

15. *Policy Option 02-02 – this policy option to defer to local plans and individual developments is not compatible with the overall aims of the Oxfordshire Plan 2050 and should be removed.*

Policy Option 03 - Water Efficiency - paragraph 122 onwards

16. *This policy is a key part of addressing adaptation to climate change. There seems to be room for other built environment policies addressing other aspects of adaptation to climate change, but these are not addressed.*

17. *Paragraph 136 – the option to set a unified policy for the whole county should be strongly preferred. Water does not recognise human administrative units.*

18. *Policy Option 03 – this policy option is preferred.*

Policy Option 04 – Flood Risk - paragraph 141 onwards

19. *Paragraphs 143-149 - The approach based on natural flood management methods and a catchment-based approach is strongly preferred. Since the consultation document still awaits the result of the proposed Strategic Flood Risk Assessment, it is clearly right to take an approach that allows a strategic planning framework for managing flood risk, rather than setting out a county-wide plan now.*

20. *Policy Option 04 – this wording achieves a balance between setting some background minimum policies and leaving discretion to local plans made after the SFRA. One minor issue is the reference to "finished floor levels above the 1 in 100 year flood level" as the likely 1 in 100 year flood level will change swiftly. Consideration should be given to specifying a government source or methodology for ascertaining the 1 in 100 year level at any time.*

Theme Two (prepared by Councillor Sean Woodcock)

Improving Environmental Quality

Policy Option 05: Protection and Enhancement of Landscape Characters

21. The Oxfordshire Plan would establish a positive strategy for the conservation and enhancement of landscape and townscape features at a county-wide landscape scale, taking account of topography, vegetation, tranquillity, dark skies, settlement pattern and landscape protection status. Landscape character and visual impact assessments would be required to support major new developments and urban extensions as well as the preparation of the Oxfordshire Plan itself and subsequent plans and strategies guiding development in Oxfordshire. Regard should be had to the Oxfordshire Wildlife and Landscape Study and relevant landscape character studies relating to parts of Oxfordshire.

22. *Panel View: Welcome a positive strategy but where are the teeth? Who helps draw it up? Why isn't this being done already? If it is, what is different? Detail missing.*

Policy Option 06: Protection and Enhancement of Historic Environment

23. The Oxfordshire Plan would establish a positive strategy for the conservation and enjoyment of Oxfordshire's historic environment at the strategic scale, taking account of the county's historic environment and heritage assets including historic landscapes, archaeology, Scheduled Monuments, World Heritage Site, Historic Parks and Gardens, Conservation Areas and Listed Buildings and their settings. Development proposals would be required to assess the impact on the historic environment and heritage assets including both known and potential heritage assets including assessing the likelihood of currently unidentified assets being identified. Regard would be had to the county's Historic Environment Record and local assessments relating to heritage assets including important views, conservation areas and locally listed buildings. Detailed historic characterisation work would be required to assess the impact of major development, including new settlements, urban extensions or rural development including proposals for the Oxfordshire Plan and spatial strategy on the significance of heritage assets. Development should conserve and enhance the historic environment and the setting of heritage assets.

24. *Panel View: Welcome a positive strategy but where are the teeth? Who helps draw it up? Why isn't this being done already? If it is, what is different? Detail missing.*

Policy Option 07: Nature Recovery

25. The Oxfordshire Plan would utilise the draft Nature Recovery Network for Oxfordshire to guide the spatial distribution of sustainable development and the spatial strategy for the Oxfordshire Plan, as part of a commitment to strengthening ecological networks, delivering biodiversity net gains and building resilience to climate change in Oxfordshire, recognising the importance of the county's habitats, natural resources and landscapes in supporting biodiversity, connecting habitats and aiding nature's recovery. The Nature Recovery Network would build on the established CTAs for Oxfordshire and would not diminish any of the protections afforded to protected sites, habitats or species but will seek to better connect them. The proposed draft Nature Recovery Network would be comprised of three zones:

    - Core Zone - the most important sites for biodiversity in Oxfordshire - including all nationally and locally designated sites, nature reserves, priority habitats and ancient woodland.

    - Recovery Zone - comprising the Conservation Target Areas, Important Freshwater Areas and additional areas added to provide better habitat connectivity.

    - Wider Landscape Zone - covering the rest of the county, recognising the important contribution that agricultural and urban landscapes beyond the Recovery zone can make to nature's recovery.

26. The draft Nature Recovery Network would provide a framework for future plan making (Including the Oxfordshire Plan) and decision-taking, ensuring that future developments do not undermine efforts to connect habitats and to make landscapes more permeable to biodiversity. The Nature Recovery Network provides a spatial illustration of a connected ecological network for Oxfordshire and sets the context for a future Nature Recovery Strategy in accordance with the 25 Year Environment Plan. The Oxfordshire Plan would support the establishment of a Nature Recovery Strategy for Oxfordshire. The Nature Recovery Network would provide a focus for biodiversity net gains and wider environmental net gains as part of a co-ordinated approach to environmental protection and enhancement for Oxfordshire.

27. **Panel view:** *What difference would these zones make to what is currently already in place?*

Policy Option 08: Biodiversity Gain

28. The Oxfordshire Plan proposes to set minimum target for biodiversity net gain across Oxfordshire to protect, enhance, restore, increase and connect the natural environment and secure measurable net gains in biodiversity. 20% biodiversity net gain - Standard benchmark for the whole of the county. Biodiversity net gain will be measured using the DEFRA Biodiversity Metric. The delivery of biodiversity net gain should follow the mitigation hierarchy with a preference to deliver gains on site. Where on site delivery is not possible,

gains should be delivered within the administrative boundary of the Local Authority and wherever possible within a Conservation Target Area.

29. **Panel view:** *Welcome ambitious target but key will be in delivery and concern over how this is implemented and enforced across different district boundaries if there is political change.*

Policy Option 09: Natural Capital and Ecosystem Services

30. The proposal is that the Oxfordshire Plan will utilise the Natural Capital baseline mapping for Oxfordshire so that it can be used to guide strategic planning for development and green infrastructure investment at the strategic and site scale including the Oxfordshire Plan spatial strategy. The Oxfordshire Plan would establish a Natural Capital Approach to planning in Oxfordshire, placing natural capital considerations at the heart of planning for development, infrastructure, and environmental enhancements including nature based solutions. A natural capital approach will recognise the importance of healthy and thriving ecosystems in supporting the health and wellbeing of communities, supporting climate change resilience and provision of ecosystems services. The Oxfordshire Plan would require an assessment of natural capital and ecosystem services impact for major developments, policies, plans or programmes including the identification of strategic environmental opportunity areas and green infrastructure. The use of an eco-metric may better enable the quantification of environmental value in order to establish the type and scale of investments to secure net gains. Local plans should be guided by the baseline assessment of natural capital assets and ecosystem services developed for Oxfordshire to influence the spatial distribution of development and investment in green infrastructure and nature-based solutions.

31. **Panel view:** *Why isn't this being done already? What teeth will this have?*

Policy Option 10: Green Belt enhancement

32. The Oxfordshire Plan would identify strategic opportunities to enhance the existing Oxford Green Belt i.e. provide access, opportunities for outdoor sport and recreation, enhance landscapes, visual amenity and biodiversity; or improve damaged or derelict land.

33. **Panel view:** *What protection does this offer to communities given the encroachments on the Green Belt in order to accommodate Housing Need? How will lost Green Belt land be replaced?*

Policy Option 11: Water Quality

34. The Oxfordshire Plan would require the following:

35. Water quality to be protected and enhanced. All development to take account of its potential impact on water quality.

36. Development to cause no deterioration in the quality of waterbodies, surface water and groundwater, nor would it prevent the future attainment of 'good' status under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and Groundwater Direction 2016 or subsequent amendments.

37. Where there are impact pathways on habitats of national or international importance, development would not prevent a protected waterbody achieving the objectives set out in the Common Standards Monitoring Guidance (CSMG).

38. Development to improve water quality wherever possible by:

- incorporating appropriate green infrastructure and Sustainable Drainage Systems (SuDS) to manage and treat surface water run off close to source and to minimise the risk from contaminants and sediment;
- reducing the risk of discharges of surface waters to the sewerage network and of pollution, including groundwater infiltration, from wastewater treatment works;
- prioritising natural flood management over hard flood defences;
- protecting and enhancing watercourses and habitats along river corridors; 78
- where appropriate restoring 'natural' systems, including de-culverting, restoring or re-profiling rivers and naturalising riverbanks;
- adopting water efficiency measures to reduce pressure from low water levels and flows; vii. restoring contaminated land; and
- working with and taking opportunities identified by River Basin Management Plans, Catchment Partnerships and flood risk management authorities.

39. Major development to be phased to align with any necessary wastewater treatment work and associated infrastructure upgrades to ensure that development would not lead to a deterioration in the quality of receiving waterbodies.

40. Measures to help waterbodies in Oxfordshire achieve Bathing Water Status, which help to protect and enhance water quality for all river users, to be supported.

41. **Panel view:** *Welcome this but what about the role of regional or national bodies including Thames Water who are not mentioned?*

Policy Option 12: Air Quality

42. The Oxfordshire Plan would support the protection and enhancement of air quality. Development would be expected to take account of:

- It's impact on air quality; and

- Any potential impacts of poor air quality on future occupiers/users.

43. Development proposals in or affecting an Air Quality Management Area would be expected to be consistent with the relevant local Air Quality Action Plan (AQAP). Major development proposals would be expected to be accompanied by an air quality assessment. Guidance would be produced to set out what information this should include. Guidance could be produced at a county-wide or local level.

44. Development would be expected to improve air quality wherever possible.

For example, by:

- supporting walking, cycling and public transport and reducing the need to travel;
- supporting the uptake of zero and low emission vehicles;
- avoiding the creation of street canyons which trap traffic pollution;
- minimising human exposure to traffic pollution through the careful design of streets, outdoor spaces and buildings;
- reducing emissions from buildings and other non-transport sources; and
- providing appropriate green infrastructure.

45. Where it is identified that development would have a negative impact on air quality, and/or that air quality would have a negative impact on the future occupiers/users of development, a hierarchical approach to mitigation would be required: Avoid – Consider measures to avoid negative impacts, particularly if sensitive uses or habitats are affected. Reduce – Where it is not possible to avoid negative impacts, consider measures to reduce negative impacts. For example, through traffic and travel management, careful design and green infrastructure provision. Offset – Where it is not possible to reduce negative impacts to an acceptable level, consider compensatory measures which take a broader view of the human health and habitat impacts within and outside the development area. This could include supporting measures in an Air Quality Action Plan or low emissions strategy where applicable. 81 Where possible, the Oxfordshire Plan would identify strategic opportunities to address the main sources of air pollution in Oxfordshire. This would be informed by evidence (including the AQIA). It should be noted that these opportunities might be more appropriately highlighted within other policies (for example policies within Theme Four: Planning for sustainable travel and connectivity). All policies in the Oxfordshire Plan would be aligned with the ambition of improving environmental quality, including improving air quality.

46. **Panel view:** *welcome but unsure which of these are not possible by district, city and county councils.*

Theme Three (prepared by Councillor Adam Nell)

Creating Strong and Healthy Communities – paragraph 293 of the consultation document onwards

Overview:

47. This Theme covers four fairly separate topics. The first is ensuring that the built environment allows people to live healthy lives with appropriate opportunities for physical recreation, sport and exercise. The second is provision for formal healthcare and medical services. The third is ensuring that the built environment in new developments is healthy and safe. The fourth is that it assists the formation and preservation of strong community ties between citizens.

48.
   These four themes impose quite different and separate requirements and constraints on future development.

Policy Option 13 - Healthy Place Shaping and Health Impact Assessments

49. Paragraphs 299 to 310 focus on health inequalities, increasing life expectancy, improving quality of life and the introduction of Health Impact Assessments. Mention is made of air quality, obesity, loneliness and physical activity. This is a mixture of abstract, statistical goals and of particular harms such as obesity or loneliness. There is some merit in treating these separately as plans to achieve progress on the two different types of item would be quite different, as would the statistical and policy tools used to assess progress.

50. Policy Option 13 – this focusses on three types of thing: statistical goals (such as "healthy life expectancy" and "physical inactivity"), particular types of harm or benefit (such as obesity, healthier food choices, crime) and particular desired activities or qualities such as social interaction, friendly communities, reduced noise and cycling and walking. It might help the reader to understand the specific benefits of the policy if each of these three different types of thing were separated out and treated separately.

51. There are references to good mental health but these are not systematic through the text. Consideration should be given as to whether to treat this important issue separately and with a more systematic approach.

52. The use of HIAs is clearly beneficial and should be part of the Oxfordshire Plan 2050.

Policy Option 14: - Health Infrastructure

53. The policy proposed is fairly simple. It is that Oxfordshire should develop an enabling policy for healthcare buildings and developments, which co-ordinates across administrative boundaries where needed and allows all stakeholders a

say in future provision for healthcare matters. This should lead to the preparation of a masterplan and include policies to future-proof buildings against the needs of new medical technology and to reduce their carbon footprint. There seems nothing to object to in this, but it lacks detail. In particular, the plan makes no distinction between healthcare provision and social care provision, although these are quite separate areas with separate funding streams and separate providers. It also makes no reference to private healthcare provision, which is in a typical year between 10% and 15% of all healthcare spending in the United Kingdom.

54. One detail which might be added is a suggestion for regular future consultation with the relevant NHS bodies and private health and social care bodies to understand their plans and changes to those plans

Policy Option 15 - High-Quality Design for New Development and Garden Town Standards for New Settlements

55. Oxfordshire clearly deserves to benefit from high quality in design of new developments and the Garden Town and Garden Village standards are an important contribution to that goal. Equally, the policy contains references to master planning and to consistency in planning but also to a range of other specific design goals.

56. Policy Option 15 – this does not take the opportunity to reference specific design standards other than the Garden Town and Garden Village standards and does not contain any mechanism for reviewing, validating and updating those standards as times change and with them local needs, locally available technologies and building materials and building practices.

57. In place of the current approach, a more generalised and structured approach could be considered under which the planning authorities would:
- Encourage good design standards;
- Specify each year or at regular intervals which codes and standards should guide development
- Regularly review and update the list of preferred codes and standards and how they should be applied in Oxfordshire;
- Specify a list of good design goals in addition to the preferred codes and standards in a structured way, again updated regularly.

58. The references to spatial planning at the end of Policy Option 15 are clearly important and desirable, but do not seem closely related to the main focus of this Policy Option on design standards.

Policy Option 16 - Leisure, Recreation, Community and Open Space Facilities

59. Paragraphs 325 to 327 - This Policy Option deals with leisure, recreation and community spaces and open spaces rather briefly.

60. As an overview, it does not consider the difference between public and private facilities and does not sufficiently distinguish between facilities which people

expect to be local and free such as childrens' playgrounds, and paid facilities for specific sports for which people will travel.

61. Consideration should be given to expanding paragraphs 325 to 327 to cover these quite different levels and types of provision and providing strategic policies at the Oxfordshire Plan 2050 level for each.

62. Policy Option 16 – this policy option lays downs important and valuable considerations for "strategic" leisure, recreation and open space facilities in Oxfordshire. It provides that "community facilities" would be a matter for individual local plans. Consideration should be given to having a set of high-level planning policies in the Oxfordshire Plan 2050 for these more local facilities as well. In addition, it might be helpful to define "community facilities" clearly in the document.

63. There is little provision relating to planning considerations for indoor spaces such as church halls and community halls, which are often used for a mixture of sporting / physical activity uses (badminton, yoga classes, Pilates classes, dance classes) and purely social uses such as drama, village meetings and social events.

Theme 4 (prepared by Councillor Victoria Haval)

Planning for Sustainable Transport and Connectivity

64. *Introductory comment*: The aspirations of theme 4, planning for sustainable transport and connectivity are clear and commendable.

   - Address the climate emergency.
   - Improve health and well being.
   - Reduce the need to travel.
   - Support people to make sustainable transport choices.

65. For the aspirations of Oxfordshire Plan 2050 to succeed it will require considerable funding (which OxIS, in part, intends to address), and a change in behaviour in how people work, and move in their daily lives. This will require more persuasion from other bodies, such as, central government and is beyond the plan's remit. Nevertheless, a commitment to change must be made at the planning level and policies need to be enforceable.

Comments and recommendations on individual Policy Options:

Policy Option 17: Towards a Net Carbon Zero Transport Network

66. It is stated that leaving these policies to local plans is not supported given the strategic and cross boundary nature of transport network. While rail, bus routes and major roads will cross boundaries, walking and cycling paths are not likely to. Will the shorter active travel routes have sufficient weight if they are held in Local Cycling and Walking Infrastructure Plans (LCWIPS)? Will LCWIPS cover the full County or only selected areas? Could active travel routes be identified in neighbourhood plans and garden town or village designs? With the place based emphasis in OxIS stage 1, journeys should be looked at on a local level. We need to be considering what stops people from cycling or walking to make those local journeys.

Policy Option 18: Sustainable Transport in New Development

67. Agree with the hierarchy of travel, (page 103), where not taking the journey in the first place is placed at the top. Workplace travel was reduced by COVID-19 and working from home practices adopted. Many organisations and employees are now choosing to work and hold meetings from home to a greater degree than before the pandemic. This flexibility employees often appreciate and can lead to cost savings and new opportunities for employers. However, to continue this trend employers need to be encouraged and to 'hear' the message that conscious efforts to reduce journeys need to be made. This is wider than planning for new developments and is approaching the same problem from a different angle. Perhaps partners like OxLEP could help with this messaging?

68. How enforceable will the policies be? Will digital infrastructure be insisted upon in the planning approval process? Current developments fall short of providing arteries for non-car based movement, yet this is key to promoting active travel and zero carbon deliveries.

69. Should all new homes, irrespective of size, have consideration about how the occupants can 'work from home'?

70. Para 346-349: Good to see that planning for zero emissions vehicles in new developments has been well considered. Minimum standards need to be set and enforced.

Policy Option 19: Supporting Sustainable Freight Management

71. Para 352: It is difficult to see how freight movements will continue to be sustainable while the A34 remains the only viable option for travel north and south bound. The A34 is a dual carriage way with no hard shoulder. When accidents occur, as they too frequently do, the traffic is paralysed. Connectivity by rail to Birmingham and Bicester from the southern end of the county is poor. Rail options towards the South West to places like Newbury, Basingstoke, Winchester and Southampton are not really available. Policy Option 19 avoids considering this problem.

72. Para 355: Roll out cargo bikes to towns outside Oxford. It's important that the planning of new developments, particularly in towns allows for a cargo bike to travel throughout the development. Consideration needs to be given to the placement and width of the paths.

73. As in Policy 17, in paragraph 356, it is stated that these matters are not well suited to consideration through local plans given the strategic nature of freight movement. However, while HGV's and rail freight crosses boundaries, local LGV and zero carbon, last mile delivery systems are more operational and organic in nature where local planning mechanisms may be more appropriate.

Policy Option 20: Digital Infrastructure

74. It would be good to see the hierarchy of first, reducing the need to travel, second, planning for sustainable travel modes and third, providing for zero emission vehicle use, to be applied throughout this theme. Providing fast and reliable internet for homes and business consistently across the county will be key to reducing the need to travel for many workers. See comments from policy 18.

75. LTCP Forward: "…we recognise that there is a need to reduce the need to travel and discourage unnecessary individual private vehicle use."

76. OxIS C1: Digitally Connected Oxfordshire: Full coverage of full fibre by 2033. Oxfordshire currently has 16.5% covered by full fibre broadband (think broadband, 2021).

77. OxIS C4: Improves Sustainable Transport Connectivity Across Oxfordshire: "Although the rise in electric vehicles will tackle transport carbon emissions, it will not tackle the county's congestion or wider health and place-shaping needs." Another reason to reduce journeys.

Policy Option 21: Strategic Infrastructure Priorities

78. The final OxIS stage 2 report is expected to become the Infrastructure Delivery Plan to support the Oxfordshire Plan. OxIS gives clear targets and identifies projects for funding using a scoring system. P19, 54% of OxIS schemes are transport (IF2) of which 41% are active travel (IF2A).

Theme Five (prepared by Councillor Andrew Gant)

Creating Jobs and Providing Homes

79. *Introductory comment:* The key question is whether respondees are being asked to give an opinion on their preferred model and quantum of growth over the life of the Plan, or simply being asked their view of how growth should be distributed, the evidence base for which has emerged via a separate, discrete process. The answer to this question is unclear from the opening material and appears to be partially answered only in Policy Option 28 and in particular para 432 (see below).

80. In either case, the document is unequivocal that the OGNA is a key evidence base. OGNA is a long document which appeared late in the process. Commenting usefully on the relationship between its scenarios for growth, the calculation of "committed" as opposed to "residual" growth, and thus of final housing numbers, is complex. Similarly, commenting usefully on the key Policy Option 28 requires detailed reading of the Spatial Strategy Options document

Comments and recommendations on individual Policy Options:

Policy Option 22: Supporting the creation of jobs

81. The policy proposes using the OGNA scenarios as the base for setting levels of housing and growth, but does not say which of the OGNA scenarios is preferred, nor how the decision on housing and job numbers will be arrived at, nor whether this decision will be subject to consultation. This policy therefore effectively leaves all possible outcomes open without saying how they will be decided. It is difficult to support it without any clarity about what it actually means

Policy Option 23: Protection of Economic Assets

82. Support, but with a caveat about the clarity of the wording, and one recommendation to strengthen policy ambition.

83. Paras 390-395 slightly hedge about whether they are talking about re-purposing and upgrading existing buildings, or extending existing sites with new build; and, if the latter, whether that is within the footprint of existing business parks and science sites, or by enlarging them by encroaching into surrounding areas. These are different things, and it is an important distinction.

84. ***Recommendation:*** *Page 116, bullet 4, should be changed from "Appropriate growth would be supported particularly where there is:" to "Growth will not be supported unless there is:"*

Policy Option 24: Town Centre Renewal

85. Strongly support, but would want to go further and, crucially, recognise that the key is aligning with other policies e.g., parking

86. *Recommendation: Bullet should be added supporting the ambition to make historic town centre spaces such as market squares and the historic streetscapes of Oxford and elsewhere essentially car-free. Opportunities of providing alternative routes for through traffic from new developments should be aligned with this ambition (for example, the new road around the Crab Hill development in Wantage could potentially be the catalyst for removing through traffic from the town centre, or at least enable better use through the creation of e.g. one-way streets)*

87. *Recommendation: Bullet should be added that other policies on e.g. parking will be aligned with this policy, to discourage drawing cars into urban centres.*

88. *There could also be a mention of enhancing the economic potential of e.g. district centres*

89. *Recommendation: This could also be the place to add an aspiration about the desired location of "shed" businesses designed to be accessed by car and requiring big car parks (e.g. those currently on Botley Rd in Oxford). These businesses should not be in urban centres. Add bullet to say so*

Policy Option 25: Visitor Economy

90. Strongly support. The policy is written exclusively around provision of new facilities: enhancement and better use of existing assets is equally important.

91. *Recommendation: Should add a policy on how tourists move around, favouring sustainable modes and actively providing alternatives to driving into historic urban centres for coach operators.*

92. *Recommendation: Should specify an aspiration to encourage overnight and multi-day stays. Para 405 is taken to imply including the industry in discussions (e.g. Experience Oxfordshire)*

Policy Option 26: Culture and Arts

Strongly support.

93. *Recommendation: The list of facilities in bullets 1-8 does not include libraries: it is taken that they are included, but should probably be specified*

94. Para 409 states that the cultural industries "will likely turn increasingly more digital," but care should be taken in enshrining this in policy: a large part of cultural and educational experience is social, collegiate and physical. While the creative industries will continue to exploit the opportunities of digital

engagement, the act of coming together will remain central. Previous predictions that technology would herald the demise of e.g. theatre, cinema, concerts have, thankfully, proved unfounded.

95. Support. Not entirely clear how this differs from current process and policy. Para 414 talks about forthcoming "reorganisation and reprovision": I'm not sure what this refers to.

96. **Recommendation:** *Policy 3b should go further: replace [new facilities should] "increase use of renewable energy and help reduce use of carbon;" with "be carbon-neutral in construction and management, and energy self-sufficient through solar panels, heat pumps, MMC and other new technologies"*

97. **Recommendation:** *This policy should also contain a commitment that all new educational facilities will embody the concept of "school streets"*

98. This is the key policy which underpins the whole Plan. All strategic planning flows from a vision of the type and quantum of growth

99. This policy is in two parts. It could usefully be two separate policies

100. *How many?* The document goes into detail about how housing numbers will be arrived at. The key para is 432, which says "The decision on the final housing requirement … will follow the outcome of this Regulation 18 Part 2 consultation". The policy (p. 131) says "scenarios for the total housing requirement figure 2020-2050 (the OGNA) need to be considered and views are sought." This appears to make it clear that respondees are invited to take a view on the "residual" number under the three scenarios in the OGNA, and thus on the final requirement. This is a complex ask. Commenting usefully will require careful reading of the OGNA and other documents, which I have not yet done

101. *Locations.* This is essentially a condensed version of the Strategic Spatial Options section, which is the subject of a separate document with a wide range of options and scenarios for location of growth. This response does not critique the entire Spatial Strategy Options document but only what appears in the main Oxfordshire 2050 document. The focus on brownfield land, and the commitment to minimising use of greenfield land, is supported. However, this document is very cagey about having to rely on future evidence such as a HELAA, so it is difficult to comment in any detail.

102. Strongly support, in particular the emphasis on prioritising brownfield over new greenfield land, ambition to upgrade or replace poorly-performing existing stock, new look at density and height, MMC and sustainable travel.

103. **Recommendation**: Support for SMEs, JVs etc should extend to innovative models of construction and ownership.

104. **Recommendation**: The policy should extend to include an ambition to re-balance urban areas by aiming to locate "shed" businesses on appropriate transport links outside towns and cities, providing significant sites within urban areas which are not "brownfield" in the normal sense.

105. **Recommendation**: The policy should aim to re-allocate sites safeguarded for employment in urban centres towards mixed-use and residential development.

Policy Option 30: Affordable Homes

106. Strongly support the overarching ambition of this policy "to seek maximum levels of affordable housing" (p. 136). Strongly support the policies on "tenure-blind" and integration within sites. The detail is about which aspects of two factors (percentage of affordable; tenure mix) are left to PAs through Local Plans. The document is a little unclear about whether it seeks to impose a uniform percentage of affordable homes: proposing "maximum levels" implies that it does, but it does not say so explicitly. At the moment this can produce potential anomalies where an area of development crosses PA borders, or, more specifically, where one authority is building to supply the "need" of another, requiring a negotiation over whose policy on the percentage requirement of affordable homes applies.

107. **Recommendation:** The Plan could usefully take a view on this: e.g. sites allocated to supply Oxford's "unmet need" will meet Oxford City Council's percentage requirement of affordable homes (as already happens by agreement in some cases).

108. The logic rejecting Alternative Policy Option 30-01 is accepted: Policy Option 30 is preferred to 30-01

Policy Option 31: Specialist Housing Needs

Support.

109. *Recommendation: Although it is implied, the policy could usefully include a commitment to designing in the benefits to mental and physical health of community interaction and access to green space.*

110. *Recommendation: The policy could also include a reference to lifetime adaptability.*

111. *Recommendation: Ambition for student accommodation should explicitly support the needs of educational establishments to continue to improve their offer to students (i.e. "zoning" should make provision of purpose-built student accommodation easier, not harder)*

112.   *The logic of not including the level of detail in Alternative Policies 30-01 and 30-02 is supported (though the aspirations in paragraphs 2-4 are supported)*

113.   [NB there appears to be a typo: the heading of p 139 refers to four Alternative Policies, 30-01/02/03/04, but there are in fact only two]

Policy Option 31: Gypsies, Travellers, Showpeople

[NB, another typo on p 141: the policy is no 31, not 32]

Support.

114.   It is difficult to plan for the needs of travellers withing small geographical regions, because, by definition, they travel.

115.   ***Recommendation:*** *This policy could include a commitment to seek common provision with neighbouring areas, or indeed across the whole country.*

116.   *The other problem is that travelling communities often do not set up on designated sites and pitches. It is probably outside the scope of this Plan to make provision for that.*