

## Oxford Civic Society

### Response to Oxford City Council Local Plan 2040 Reg.18 Part 2 consultation

#### 1. The context of the consultation and questions arising

1. It was intended that the Oxfordshire 2050 Plan would set out the long-term, overarching and high-level spatial planning framework for Oxfordshire for the period to 2050. This would have been based on the scale, pace and distribution of employment and housing growth which had been agreed by all local planning authorities in Oxfordshire. Without the Oxfordshire 2050 Plan the local planning authorities have agreed to use the city and district local plans to provide the framework for long term development planning of Oxfordshire<sup>1</sup>. The Oxfordshire 2050 Plan preparation failure was very disappointing. It is equally disappointing that the reasons for and the risks of the failure are not being debated.

2. Oxfordshire is considered to be a Functional Economic Market Area (FEMA) and Housing Market Area (HMA). We agree with this characterization as it is clear that individual districts do not operate as self-contained areas within which people live and work and carry out their daily lives- instead the labour and housing markets function over the whole Oxfordshire area (with some additional commuting into and out of the county). This should better enable the local planning authorities to use their local plans to prepare a framework for Oxfordshire's development, but Oxford Civic Society is not convinced that the Duty to Cooperate nor the Future Oxfordshire Partnership are adequately equipped to ensure this. **What is the evidence that this approach will provide the framework needed? What are the risks?**

3. At odds with the August statement by district and city leaders, Oxford city council and Cherwell district council have commissioned an updated Oxfordshire - wide growth analysis, the Housing and Economic Needs Assessment (HENA) and Oxford city council are consulting on this as Part 2 of the Regulation 18 Local Plan Consultation. **The initiative of Oxford and Cherwell to prepare the HENA without full collaboration of all Oxfordshire local planning authorities risks another failure? Why did the Oxfordshire 2050 plan preparation fail and does the preparation of HENA overcome the problems face by the Oxfordshire 2050 Plan preparation?**

4. Although it has been agreed within the Future Oxfordshire Partnership that a Planning Advisory Group will be established with the Partnership to guide collaborative strategic planning following the failure to prepare an Oxfordshire 2050 Plan, **to date this has not yet happened.**

5. Oxford city and the Oxfordshire district councils are all updating their local plans, although Cherwell District Council has deferred its planned Regulation 18 consultation on its local plan update. Cherwell's deferment is because their Scrutiny Committee raised very many concerns with the draft local plan and considering these will take time.

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<sup>1</sup> On Wednesday, 3rd August 2022, a joint statement from the leaders of Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council was made that *...."we regret that we were unable to reach agreement on the approach to planning for future housing needs within the framework of the Oxfordshire Plan"*.

The statement went on to confirm that *..... "local plans for the city and districts will now provide the framework for the long-term planning of Oxfordshire. The Oxfordshire Plan 2050 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing needs will now be addressed through individual Local Plans for each of the City and Districts. The Councils will cooperate with each other and with other key bodies as they prepare their Local Plans."*

6. It is noted that a number of planning authorities are halting or revising their local plans due to policy uncertainty - more details on policy changes that the Levelling Up and Regeneration Bill will bring are awaited. **Should Oxford city defer local plan preparation or continue? Has this been considered (also to provide time to build consensus around an approach to Oxfordshire's longer-term development)?**

## 2. Oxford Civic Society consultation response

### 2.1. Are there other ways of identifying housing need that should have been considered?

7. **A collaborative approach involving all Oxfordshire local planning authorities is required.**

8. **We agree that an employment led projection of employment and housing growth is appropriate. But the approach must explicitly address climate change, improving environmental quality, creating strong and healthy communities, planning for sustainable travel and connectivity as well as creating jobs and providing homes.**

9. **We suggest that development planning in Oxfordshire is a very special case, with current and potential private sector investment of national and international importance – in terms of productivity and contribution to the exchequer and in terms of contribution to science with world-wide benefits. The national and international role should be supported by a strategic development planning process which is second to none. The current consultation does not demonstrate this.**

### 2.2. Do you have any comments on the methodologies used in the HENA?

10. **It is agreed that the Standard Method does not yet reflect the release of updated demographic information from the 2021 Census. Equally, the Standard Method does not account for actual economic trends or strategies that reflect the importance of Oxford and Oxfordshire to the regional and national economy.**

11. **We agree that the comparison of mid-year population estimates that the Standard Method relies on, to what has actually happened in terms of population growth (as shown by the Census) demonstrates that Oxfordshire population growth has not been as predicted in the ONS 2014-based population projections, but is higher (18,700). An earlier review of this discrepancy using census preliminary results and mid-year 2018 estimates also showed a discrepancy<sup>2</sup>.**

12. **We agree that this is an exceptional circumstance that justifies a departure from the Standard Method, but suggest that evidence of why the higher growth has been recorded is needed. As examples - is it an error in the 2021 census methodology / the result of very unusual COVID related population movement in 2021 or is evidence available of higher rates of growth experienced in specific parts of the county as new employment or housing opportunities have come on stream? It is noted that ONS is rebasing / reconciling mid-year projections and the 2021 census results although we understand that the result may not yet be available. **Our point is that we need to be absolutely****

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<sup>2</sup> A review of the initial results of the 2021 census suggest that the Oxfordshire Growth Needs Assessment (OGNA) underestimates the 2018 base population in Oxford, Cherwell, South Oxfordshire and West Oxfordshire (by calculation of the average annual rate of population growth 2011-2021 and applying that rate of growth to 2011-2018). The overall discrepancy for the county in that review is about 15,276 i.e., the OGNA underestimated population growth in the county to that extent.

confident of this figure – it is higher than expected so we do need an explanation of why that is and evidence.

13. We are pleased that the HENA uses 4 scenarios, 2 based on demographic projections, with affordability considered, and 2 using employment. **Establishment of the four scenarios is an appropriate methodology (although collaboration between all districts would have improved the methodology significantly).**

### 2.3. Do you have any other comments on the Scenarios

14. **We are most interested in the employment led scenarios – private sector development funding in Oxfordshire is unlike funding in most areas of the country.** Private sector funding is at an astonishingly high level. For example, in total, corporate investment raised by companies headquartered in the Oxford area totalled around £4.8 billion during 2021, of which over 58% was related to life sciences<sup>3</sup>. How the public sector responds to this is the challenge and we fear that the local planning authorities are not addressing the challenge adequately. **Good growth is needed and this consultation is not a promising foundation, as it stands.**

15. We note that the Standard Method collated figure for Oxfordshire shows a need for 3,388 dwellings per annum, the Census-adjusted Standard Method scenario Oxfordshire shows a need for 4,721 dwellings per annum. We also note the economic baseline trend scenario for Oxfordshire shows a need for 4,406 dwellings per annum and economic development-led scenario for Oxfordshire shows a need for 5,830 dwellings per annum.

16. **Our concern with the employment led scenarios is of course the economic uncertainty that exists currently and which could have an impact on the high levels of inward investment in Oxfordshire.** The scenarios have demonstrably attempted to tackle this uncertainty – but the economic future in UK and world wide is uncertain. The collapse of the SVB bank earlier this month was not predicted and could have repercussions in UK as it was the pioneer of a venture debt market that gave start-ups an alternative source of funding. A further (and self-inflicted) uncertainty is the role of the current update of the Oxfordshire Strategic Economic Plan. **The SEP update may influence the choice of employment growth in Oxford / Oxfordshire – is it coordinated with the Oxford Economic Strategy and this stage of the development of the Oxford Local Plan 2040?**

17. **We need an Oxfordshire employment and housing growth strategy which is responsive to periods of confidence and periods of uncertainty. For housing there is nothing uncertain about the demand for social housing and key worker housing and consistent policy and delivery is needed.**

18. **The rate of housing delivery is also of concern.** Of the housing allocations in the current district council local plans, completion rates after 9 years were 31% (Cherwell), 24% (South Oxfordshire), 40% (Vale of White Horse), 28% (West Oxfordshire). Even allowing for slow starts in a 20-year local plan implementation period, most of these completion rates are not likely to achieve the target rate of completions by the end of the plan periods. Average annual completions Oxfordshire, including Oxford's completions since 2016, has been 3,721. **Neither of the HENA recommended employment led rate of completions will be possible to achieve unless measures are taken to make delivery more efficient and effective?**

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<sup>3</sup> See Spotlight: Life Science Capital Raising in Oxford, Savills, 18 March 2022 and Spotlight: Oxford Offices & Laboratories, Savills 18 March 2022 [Savills UK | Spotlight: Life Science Capital Raising in Oxford – March 2022](#)

2.4. Do you have any comments about the reasoning for selecting the most appropriate scenario of housing need

19. **As noted, Oxford and Oxfordshire have an especially important economy and an employment led projection of employment and housing growth is appropriate.** The extreme case is unlikely to be achievable in building completion terms alone, without considering the other aspects of the Oxfordshire Vision – addressing climate change, improving environmental quality, creating strong and healthy communities, planning for sustainable travel and connectivity and creating jobs and providing homes. **With this in mind we agree that the economic baseline trend scenario is the most appropriate scenario, but a sustainability assessment of the scenario is essential.**

2.5. Do you have any comments about the methods for dividing the Oxfordshire housing need between the districts, leading to the need figure of 1,322 for Oxford?

20. **We note that although it is clear that Oxford city will be looking for support from neighbouring districts to provide housing, it seems likely that Cherwell may be the only district likely to agree to additional housing numbers, beyond the period of the current local plan.**

21. **In addition, the current local plans across Oxfordshire already identify enough sites for Oxford's unmet housing needs to meet the need to the mid-2030s.** The additional need is going to be from the last four or five years of this new set of updated local plans (and we assume that the districts will not have the delivery capacity to increase the amount of housing targeted in earlier years). **There will be new sites coming forward in Oxford, though these are likely to be small, and an assumption of additional capacity from windfall sites, from increased density and from policy adjustments. That will cover some of the new need, leaving a new unmet need figure which will be quite small (and needs to be calculated as part of the HENA).**

22. **We also note the view that existing unmet need sites include several whose full capacity is not taken account of in the existing round of local plans. For example, the delivery trajectory of the SODC sites go beyond the end of their current Local Plan, and so there is capacity on those sites that is not yet counted. Similarly, some unmet need sites have density policies which are lower than is appropriate for edge of city sites – this is notably true of Cherwell's sites – and so policy adjustments to increase density will increase the capacity of these sites significantly.**

23. **These factors should reduce the extent to which neighbouring districts are being asked to accept further Oxford unmet need housing numbers, whilst Oxford meets more of the demand for employment. This needs to be verified and quantified in the HENA.**

24. **But overall, we need a robust county-wide agreement on employment and housing growth which accepts a high rate of employment growth which addresses climate change, improving environmental quality, creating strong and healthy communities, planning for sustainable travel and connectivity and providing homes. If each district sets its targets according to its councils / electorate wishes, the consequence is likely to be that employment and housing growth rates will be high in Oxford and Cherwell. Would that be manageable?**

### 2.6. Do you have any comments about the assessment of housing capacity?

25. It is stated in the consultation that the densities assumed for calculating capacity are the highest possible to make efficient use of land, whilst taking account of the need to maintain character, and are based on an assessment of best practice and examples across the city. We encourage looking at the issue of density in more detail and with more public discussion. A lot could be gained by incrementally increasing average residential densities (not tower blocks!). Public transport, hospitality and retail all benefit as do climate change mitigation and adaptation, biodiversity / greenspace and community enhancement. Incremental densification could take advantage of radial route frontages and the areas around Oxford's sub-centres.

26. We also highly recommend that Oxford city and Cherwell revisit the study which won the Wolfson Prize<sup>4</sup> in 2014. Most of all the study describes a bold attempt to reshape a city and the ideas it develops and proposes are even more relevant in Oxfordshire to-day, than in 2014, almost 10 years later. **This could be linked with a Green Belt review and the use of some of the inner Green Belt for growth. We very much encourage a study of this.**

## 3. Our comments on the conclusion

27. The following bullet points present our key hopes and fears:

### 3.1. General comments

- To inform their local plan updating, the assumptions and data underpinning the HENA must be reviewed by all district councils and relevant associated strategic planning and plan making entities
- The HENA needs to be reviewed (including in public meetings) for consistency with climate change / environmental and social / inclusivity priorities and for consistency with the Oxfordshire Vision overall.
- In an associated activity, the longer-term growth implications of the Local Industrial Strategy and updated Strategic Economic Plan need to be aligned with climate change, environmental management, inclusivity, infrastructure capacity, public and private funding availability and institutional capacity to manage growth.
- It is disappointing that funding infrastructure and services to support the growth occurring in Oxfordshire does not appear to be a topic of much concern i.e., as a constraint to implementation of a local plan. What is needed is a major investigation into innovative funding arrangements to address the funding gap.

### 3.2. Pace of Growth

- To a great extent the pace of growth is dictated by the pace of growth of private sector investment.

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<sup>4</sup> Uxcester Garden City: Winning Submission of the Wolfson Economics Prize 2014, URBED

The winning entry illustrated how the city of Uxcester (based partially on Oxford) could double its size by adding three substantial urban extensions each housing around 50,000 people. These lie within a zone 10km from the city centre and are configured as triangles with only the point touching the edge of the settlement. The farmland around the city is currently not accessible to the public and of little ecological value. The concept is that for every hectare of development another will be given back to the city as accessible public space, forests, lakes country parks etc... Each of these satellite extensions would be served by a tram or Bus Rapid Transit (BRT) running from the existing mainline station on disused lines and then switching to on-street running to loop through the new neighbourhoods. The housing would be developed incrementally to create space for small developers and self-builders alongside the volume housebuilders in a process that recreates the way that the great estates were built in London.

- But it will also need to be commensurate with the capacity (skills and funding) to undertake necessary public sector investments:
  - Organizational and institutional arrangements are needed to ensure the management of growth (including continued strategic planning, with more emphasis on integrated development planning).
  - Innovation in public sector funding is urgently needed.
- The investment programmes for the Local Transport and Connectivity Plan, and Oxfordshire Infrastructure Strategy need to be better aligned, along with the phasing of spatial distribution of employment and housing in local plan revisions. This likely to take a few more years, especially with the timing of the second part of the LTCP.

### 3.3. Distribution of growth

- Spatial distribution options cannot be evaluated without knowing the scale of the development growth to be accommodated.
- Spatial distribution should be determined by economic considerations and climate change / environmental and social considerations all having equal weight.
- The ratio of employment and housing provision needs to be considered (by district / city and/or by spatial options) with reduction of commuting / reduction of car travel and enhanced housing affordability the main aims.
- The predominance of the Knowledge Spine as a magnet for private sector investment should be recognised and further growth in the Spine area assessed from a climate change / environmental and social / inclusivity point of view.
- Considerations of the distribution of growth should also include detailed assessment of the availability of basic infrastructure and the scope for extending existing infrastructure provision. (Cost may be a significant factor in determining the distribution of growth).
- Current gaps in infrastructure provision to 2040 need to be explained in detail (perhaps in Stage 2 of the Oxfordshire Infrastructure Strategy, along with projections of investment needs to 2050). Gaps may need to be closed before further development is serviced.
- Analysis of recent trends has shown that, as a result of employment growth accelerating relative to the supply of housing, net commuting into the Oxfordshire has more than doubled over the past decade. This means more people are commuting – and commuting further, typically using private transport - to work in Oxfordshire, exacerbating congestion and environmental effects.

### 3.4. Integrated development planning

- Over the past several decades, the approach to English development planning has evolved, opportunistically absorbing ‘shifting ideologies, legislative vagaries, conflicting perceptions of the future and the influences of global forces’ many of which are ‘beyond any possibility of local influence<sup>5</sup>.’ Reform of the planning system is long overdue. In Oxfordshire, we have too many strategies and plans and integration would be helpful and could lead to better plans and ‘good growth.’ The synchronization and coordination of the strategies and plans and essential associated studies (especially the OGNA) has been difficult to achieve and a more integrated approach may optimize scarce resources.
- The value of the Oxfordshire Vision as an innovatory concept is very welcome (as is the ‘good growth’ definition). The Local Industrial Strategy, Local Plans, Oxfordshire 2050 Plan, Local

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<sup>5</sup> ‘Visions for Oxford in the 21st century’ published by Oxford Civic Society in 2003. The author of the preface to this report, the President of the Society at the time, Anthony Smith, argued this. It is as true now as it was then.

Transport and Connectivity Plan, Oxfordshire Infrastructure Strategy and other plans and strategies are all describing ways in which the Vision can be achieved. This common purpose should be reflected in common approaches and integrated thinking about the interrelationships between the economic, environmental and social components of the Vision. The Oxford Civic Society is not convinced that an adequate level of integration has been achieved and looks to organizational and institutional changes that could encourage this in the longer term. The major integration challenge lies in achieving alignment of development and infrastructure proposals on the ground – the investment programmes.

### 3.5. Further public consultations

- The current HENA needs to be reviewed more widely. This needs to be a public review with opportunities for discussion (there is no consensus on growth – it is a very divisive topic and the plan will be a better plan with public support behind it).
- It is suggested that to avoid confusion and exhaustion any HENA countywide public discussions should include the inputs from the Local Transport and Connectivity Plan, Oxfordshire Infrastructure Strategy and other relevant strategies and plans – in one succinct consultation document. This would also clarify how far the strategies and plans are integrated.
- Consultation meetings could include representatives of the key plans and strategies who could explain how their plan or strategy is relevant to national and local policy including the Oxfordshire Vision and is complementary to the other plans and strategies. This would be very helpful in building a rounded understanding of the future of Oxfordshire.
- As an adjunct of the proposed Future Oxfordshire Partnership Planning Advisory Group a Citizens Assembly type of organization could report to the Future Oxfordshire Partnership Scrutiny Committee, supporting and strengthening the monitoring and evaluation process.

### 3.6. Governance

- An Oxfordshire-wide continuous strategic planning process is needed, synchronized with Local Plan and Local Transport and Connectivity Plan updates.
- The continuous strategic planning process should use integrated economic, climate change / environmental / social / inclusivity teams.
- An office of public sector funding innovation is needed – perhaps in association with other local authorities. This office could report to the Future Oxfordshire Partnership, effectively being another Sub-group.
- The strategic planning process and the interests of integration would be served by the development of a set of performance indicators geared to the delivery of the Oxfordshire Vision outcomes for use in monitoring the Oxfordshire Plan and associated plans and strategies.

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