

NO EXPRESSWAY

noexpressway.org

FAQs about the current consultation on the future of Oxfordshire to 2050.

Q. What is the JSSP?

A. JSSP stands for the Joint Strategic Spatial Plan, a plan for the future of Oxfordshire beyond the current round of Local Plans that run from 2011 to 2031 (Cherwell, Vale of White Horse and West Oxfordshire), 2034 (South Oxfordshire) or 2036 (Oxford City). The JSSP plan runs to 2050 (with some overlap with the existing local plans in the 2020s).

Q. How does the JSSP differ from the recent round of Local Plans?

A. The most significant difference is that the JSSP applies to the whole of the county, rather than comprising a series of separate local plans (as in the current round). The problem with Local Plans is that the separate Oxon District Councils decided independently where to put houses, infrastructure etc. without referring to each other; there was a statutory 'duty to co-operate' but this mostly amounted to delivering homes for Oxford City's unmet housing need. Were all of each district Council's houses in the right places, and were the 'unmet needs' houses suitably placed for those in the City who need them (rather than placed where local landowners had plots of land to sell)? In Oxford City, a greater number of workers commute in each day from outside the city than actually reside and work in the city itself. This has implications for houses and public transport, as well as for roads, congestion, pollution etc. and needs to be addressed in a collaborative, county-wide way.

Q. How else does the JSSP differ from Local Plans?

A. Obviously the JSSP differs in time scale and therefore also in the certainty of the assumptions on which it is based. It is described as aspirational but must, at the same time, be deliverable, or at least realistic. Once the JSSP is determined, future Local Plans (post 2031/2036) will fit within the framework it establishes.

Q. So who is preparing the JSSP?

A. Representatives from each of the District Authorities in Oxfordshire have collaborated to produce the JSSP. There has already been at least one round of public consultation from November 2017 to January 2018 on a '*Vision of Oxford City for 2050*', with five themes; Work and learning; People and communities; Built and natural environment; Transport and connectivity; and Culture and leisure:

<https://oxford2050.com/>

There were 562 responses to this vision, summarised here:

<https://oxford2050test.files.wordpress.com/2018/03/oxford-vision-2050-consultation-report.pdf>

Separately, something similar was developed for the county, 'Oxfordshire 2050; a vision for the future', concentrating on jobs and transport, with development timelines to 2031 and then to 2050

<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/Oxfordshire2050.pdf>

Q. What, if any, 'rules' must the JSSP follow?

A. Local Planning in England is constrained by the National Planning Policy Framework (NPPF, 2018, from the Ministry of Housing, Communities and Local Government, MHCLG) that sets out planning policies, concentrating mainly on housing and housing infrastructure. A key theme of the NPPF is planning for 'sustainable development', which is summarised as:

'meeting the needs of the present without compromising the ability of future generations to meet their own needs.' (NPPF 7.)

The NPPF identifies three planning objectives;

*a) **economic**, to help build a strong, responsive and competitive community, by ensuring sufficient land of the right type is available in the right places and at the right time to support growth;*

*b) **social**, to support strong vibrant and healthy communities.. by ensuring a sufficient number and range of homes to meet the needs of present and future generations; and*

*c) **environmental**, to contribute to protect and enhance our natural, built and historic environment, by making effective use of land, helping to improve biodiversity (sic), minimising waste and pollution and mitigating and adapting to climate change.*

At the heart of the framework is a presumption in favour of sustainable development (PIFOSD) defined in NPPF 11. For **plan-making** PIFOSD states that plans should seek opportunities to meet the development needs of their area, and that strategic policies should provide for objectively assessed needs for housing and other uses. For **decision-taking** PIFOSD states that development proposals that accord with up-to-date local plans should be approved without delay, and that where there are no plans, or out-of-date plans, planning applications should be granted automatically. For both plan-making and decision-taking, exceptions are allowed where development should not take place (e.g. when the harm done would outweigh the benefits).

Clearly there can be, and indeed there has been recently, discussion of precisely what constitutes an objective assessment of housing need, and the sorts of situations where a proposed development might do more harm than good (e.g. in the green belt).

Q. What other demands does the NPPF place on Local Authorities and Developers?

A. The key demands of the NPPF are as follows:

- Plans should be 'aspirational but deliverable' (NPPF 16 b))

- Strategic policies should look ahead over a minimum 15 year period (NPPF 22.)
- Strategic policies should identify sufficient land, and at a sufficient rate, to address objectively assessed need over the plan period (NPPF 23.)
- Plans and policies should be under-pinned by relevant and up-to-date evidence (NPPF 31.)
- Plans will be judged 'sound' if they are **Positively Prepared** (i.e. they meet objectively assessed needs, including a duty to cooperate with adjacent authorities); **Justified** (i.e. the chosen strategy is better than reasonable alternatives); **Effective** (i.e. deliverable over the plan period; and **Consistent with National Policy** (i.e. accord with the NPPF guidelines!) (NPPF 35.)
- Authorities are required to support the Government's objective of significantly boosting the supply of homes (NPPF 59.) (the Govt wants 300,000 new homes per year across the country; currently only 230,000 are being built). Planning policies should specify the number and type of houses to be built (NPPF 61.), with a minimum of 10% affordable homes in major developments (NPPF 64.).
- NPPF Chapter 5 (NPPF 59.- 79.) stresses the need for a mixture of houses and tenure types that are clearly not being delivered at the present time. Current build-out rates are approximately 5% per year on large sites, meaning that it takes >15 years to complete each site. The Letwin Report reckons this slow rate is due only to the fact that each company is building a particular type of house, rather than a mixture of styles:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf
 and therefore that the solution is somehow to get multiple companies working on each site, each one building a different style of house (current mechanisms do not favour this, and the Letwin Report suggests a couple of models to achieve it).
- Authorities are also required to support economic growth and productivity (NPPF 80.), and to put in place mechanisms to increase inward investment (NPPF 81.) whilst, at the same time, supporting a prosperous rural economy (NPPF 83.)
- Planning policies must take into account the role that town centres play at the heart of local communities (NPPF 85.). Edge of centre sites should be well connected to the town centre (NPPF 87.)
- Open green spaces should be available for recreational, social and health reasons, and designated in Local Plans (NPPF 96 to 101.)
- Transport issues must be addressed at an early stage of plan making; opportunities for walking, cycling and public transport should be pursued (NPPF 102.), e.g. with walking and cycling networks (NPPF 104.)

- Authorities must make effective use of land, including brown-field sites (NPPF 118.), and should avoid homes being built at low densities (NPPF 123.). Developments should be well-designed, safe, visually attractive, sympathetic to the local character and history, maintain a strong sense of place and sustain an appropriate mix of development (including green and other public spaces) (NPPF. 127.).
- The establishment of new Green belts should not be encouraged (NPPF 135.) but those that already exist should only be altered where exceptional circumstances apply (NPPF 136., 144.)
- Plans should take a proactive approach to mitigating and adapting to climate change (NPPF 149.) and should avoid development in flood risk areas (NPPF 155.). They should also take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment and landscape scale across local authority boundaries (NPPF 171.).

Q. What documents should I be reading to get up to speed with the JSSP?

A. There are three key documents, all available on this site:

<https://oxfordshireplan.inconsult.uk/consult.ti/>

The most important document is titled *'Introducing the Oxfordshire Plan 2050'* – essentially the JSSP itself (second document on the website). When you click on this link on the website you will find there are nine accompanying 'Topic Papers' to go with the overall plan paper.

The document titled *'Oxfordshire Plan 2050 - Sustainability Appraisal Scoping Report'* (first document listed on the website) was commissioned on behalf of the Oxon Local Authorities to carry out a sustainability assessment (including a Strategic Environmental Assessment, SEA) of the JSSP.

Both the above two documents are now open for consultation until 25th March 2019. The first document, *'Introducing the Oxfordshire Plan...'* is open for Regulation 18 consultation – essentially the start of public engagement, dealing with the scope of the plan – what should and should not be included. We are allowed to comment on what the plan should contain (bearing in mind it must conform with the NPPF).

The third, very much shorter, document is titled *'Oxfordshire Plan 2050 – Call for Ideas'*. Where are the most suitable places for development and growth? This consultation ends on 12th April 2019.

Q. So what does the JSSP say about the future of Oxfordshire?

A. The main document *'Introducing the Oxfordshire Plan 2050'* is only 22 pages long. It highlights 10 Draft Objectives (what the plan aims to achieve) in green boxes and 5 Discussion points (direct questions to us) in red and blue circles. For each discussion point we are asked if we agree or disagree with the vision/aspiration, and whether or not we want any changes made.

Page 3 gives the overall vision of the plan, with which few could disagree. Words such as 'integrity', 'richness', 'secure and good quality housing', 'attractive and desirable places to live', 'sustainable

travel options', 'well-skilled, high value jobs', 'fit for the future' and 'resilient to climate change' all occur in a few brief sentences. What's not to like?

Pages 4 to 8 sketch out the Oxfordshire context. Aliens from Mars can start here. The emphasis is upbeat (Oxon's residents score the county as 7.87 out of 10 for life satisfaction, the average for the South East being a pathetic 7.76. Heroic decimal points separate us from the average misery of our compatriots!), with occasional flashes of honesty (*e.g. 'There are areas of deprivation, however, with notable differences of life opportunities and quality of life within relatively small geographical areas'*).

Pages 9 to 14 cover 5 Aspirations as follows:

Aspiration 1. Protect environmental quality

Aspiration 2. Strong and healthy communities

Aspiration 3. Support economic growth

Aspiration 4. Improve housing availability and affordability

Aspiration 5. Improve connectivity and movement

Many of these in one way or another are affected by the delivery of new houses in the county into the future. The JSSP refers to the 100,000 homes that will be built under the Oxfordshire Growth Deal (as part of the combined current Local Plans) and says that the aspiration is to deliver additional housing beyond this total (which, it says, will be needed anyway by 2050, with or without the JSSP).

Pages 16 and 17 deal with Potential Spatial Scenarios - how to distribute all those new houses required between the 2030's and 2050 (remember that the 100,000 houses to be built by 2031-2036 are already allocated to specific sites in the existing Local Plans). These pages are among the most controversial because they imply significant growth in housing beyond the 2030s (the need for which is hotly debated). Those familiar with the *NIC Cambridge, Milton Keynes and Oxford Future Planning Options Project, Final Report, February 2018*, a.k.a. the '5th Studio SQW Report' will recognise some of the spatial suggestions here, for example to intensify around the edges of existing larger settlements, or to link strings of separate settlement clusters, etc. etc. The spatial possibilities are more or less endless, but a whole load of other planning experts concentrate on a very few options which, they claim, are the only viable ones (see the *Alternative Futures* section at the end of this document).

Pages 18 to 20 deal with Infrastructure considerations. It mentions the Oxfordshire Infrastructure Strategy (OXIS) dealing with the county's infrastructure to 2040:

<https://consultations.oxfordshire.gov.uk/consult.ti/OxIS/consultationHome>

and

<https://www.oxfordshiregrowthboard.org/projects/oxis-stage-2/>

for Stage 1 and Stage 2 reports respectively,

without mentioning the £8 billion hole in the infrastructure budget (see the Reports) beyond stating the obvious:

'66. However, there is still a funding gap and deliverability issues for many strategic projects and so their delivery is not guaranteed. A bold, forward thinking Oxfordshire Plan that sets a clear vision for growth is more likely to release opportunities for Government funding..'

Trying to spend your way out of a current funding crisis, especially relying on the Government to do so, does not seem a sensible strategy in a post-Brexit Britain.

Mention is made of the Ox-Cam Expressway and of the South East Strategic Reservoir proposal for Oxfordshire (item 63) and how the Oxfordshire plan makers are responding to them, and might influence them (item 64.). (The Abingdon Reservoir proposal is opposed by campaigners, MPs and the County Council and is, in any case, intended mainly to benefit other areas in the South East rather than Oxfordshire itself, which will be short of water during the JSSP period.).

The message in this section is therefore to mitigate the impact (congestion, pollution etc.) of the 100,000 new homes being provided under existing Local Plans whilst preparing to do the same for up to twice as many more homes under the JSSP.

Page 21 states that the planners are keen to hear our views.

Each of the Topic Papers gives more background to each section of the Oxfordshire Plan 2050. Topic Paper 8 is a bit more forthcoming on the Expressway and EWR, including the statement that the NIC expects the Oxfordshire Plan to identify within its area one or more sites for new and expanded settlements *'consistent with the Government's stated housing ambition for this area'* (item 37.).

The *Sustainability Appraisal Scoping Report* is 80 pages long and gives more detail again about the policy context of the JSSP, the baseline data for the county and the likely problems that may be encountered in carrying out the JSSP. It develops a series of assessment criteria for the JSSP parts, and as a whole. This is not an easy read, but the boxes at various points in the text identify key sustainability issues for Oxfordshire (e.g. high reliance on private cars) and what is likely to happen to them with and without the JSSP (e.g. without the JSSP car dependence will remain high; with the JSSP and associated plans, public transport, walking and cycling will be promoted).

For each of the three documents on the JSSP website there is a link to a consultation questionnaire that can be filled in online.

Q. How should I respond to this consultation opportunity?

A. It seems that you can criticise the *'Introducing the Oxfordshire Plan 2050'* document in terms of its particular vision for the future of the county (number of jobs, houses, people etc). Do we want or need these numbers, and what effects might they have on our present way of life? It's probably not a good idea to come across as a NIMBY anti-everything here. We do need more houses but will the JSSP ideas provide the right sorts of houses? Or can we make suggestions as to how other cities faced with the same problems have solved them differently?

You can respond to the longer Sustainability Appraisal document in terms only of the facts it gathers together to underpin that vision (has it missed anything out? Are the background facts correct?). The latter document shows various maps of obvious constraints (e.g. flood risk areas, green belts, AQMAs, SSSIs etc.) but it does not identify any particular area for any particular development. You can also criticise, or at least challenge, the assumed benefits of the JSSP in the various box sections in this document. Will an infrequent public transport system really stop people using their cars? How do you make the private sector (whether buses, rail or house-builders) provide the level of service or delivery to effect a decent JSSP?

Alternative Futures?

This section, gives a number of alternative ideas about the future of our towns, cities and countryside.

Anyone for Garden Towns?

The idea of Garden Towns or Garden Cities is being strongly promoted by the Government at present. Bicester was given Garden Town status recently and there is a proposal for a Cotswold Garden Town of c. 1100 houses just North of the A40, near Eynsham, a scheme criticised by Oxford Futures here:

<https://www.oxfordfutures.org.uk/2018/12/a40-improvements-ofs-response/>

. It's difficult to avoid the conclusion that using the term 'garden town' is nothing more than a re-badging of the 'business as usual' scenario of development to date. The history of the Garden Towns idea goes back to Ebenezer Howard, but the real key to them was that the uplift in the value of the agricultural land used for them was captured by and for the community. All sorts of benefits flow from this simple first step. Unfortunately in the current planning system this is unlikely ever to happen again without the Government proactively designating large areas for new towns at 'no scheme' or 'no plan' land values (something that only seems to happen for National Infrastructure projects like HS2). If developers have to buy building land at £5million per hectare (Oxford prices) there isn't much left in the kitty to pay for vital infrastructure.

The Garden Towns built after WWII are generally regarded as failures (most ended up as dormitory settlements for nearby larger towns) with the single exception of Milton Keynes (MK) but, even here, the design is no longer fit for purpose. MK is a fairly scattered settlement in which the percentage of journeys by car is greater than in most traditional cities. Public transport is rather poor for the same reason (scattered settlements make buses unprofitable; people are forced to use their cars).

For a decent critique of garden towns ideas please see the Future Spaces Foundation '*Vital Cities not Garden Cities; the answer to the nation's housing shortage?*'

<http://www.futurespacesfoundation.org/wp-content/uploads/2016/04/Vital-Cities-not-Garden-Cities-FSF-dps.pdf>

For a Wolfson Economics prize winning submission '*Uxcester; garden city*' please go to URBED's site:

http://urbed.coop/sites/default/files/20140815%20URBED%20Wolfson%20Stage%20_low%20res3.pdf

(the Wolfson Economics prize is second only to the Nobel Economics prize). Oxford is used as a case study in this document, and you may be fairly horrified by the satellite development proposed East of the City covering an area almost to Beckley (p. 58).

Key to the 'new garden city' idea proposed in this document are areas of very high housing density, between which green spaces give the residents an opportunity to relax and exercise.

Danny Dorling has written and spoken a lot about inequality, housing and urban development. Here is his take on Oxford and how we need to get back to cycles and pedestrianised areas in city centres:

<https://www.youtube.com/watch?v=kjj6hUEPFYA>

This talk was one in a series titled 'Oxford Futures' (organised by the URBED Trust), and available here:

<http://www.urbedtrust.com/oxford-futures/>

Other talks in the same series are well worth a look.

Two other documents from URBED are '*Oxfordshire Futures 2050; achieving smarter growth in Central Oxfordshire*':

<http://www.urbedtrust.com/oxford-futures/>

and '*Affordable Housing for Oxford: how could Oxford innovate*':

<http://urbed.coop/sites/default/files/Affordable%20Housing%20for%20Oxford.pdf>

The general message in many of the above is that very high housing densities (>>50 houses per hectare or more) do not consume much valuable agricultural land; allow for green spaces in between buildings; provide enough and concentrated work forces to encourage businesses to set up locally (thus reducing commuting); and have enough people to support rapid urban transit systems. Because distances are so short, cycling and walking become feasible ways of getting around. Sensible developments of multi-storey buildings can allow green spaces at height, in balconies, or on roof-tops. 'High densities' should no longer mean 'concrete jungles'. Where such developments have taken place in Europe they very often arise through the vision and drive of individual mayors etc.

Even within ancient cities such as Oxford, large areas of poor quality houses could be demolished to make way for much higher density residences, thus helping to solve the city's housing crisis:

https://www.wnvermeulen.com/files/housing_for_oxford.pdf

DJR

1/3/2019