

# Oxfordshire Plan 2050 Consultation March 2019

## Responsible Planning in Burford RESPONSE

### Context for our Response and Key Issues

Responsible Planning in Burford (RPiB) is a community group formed to coordinate action by Burford residents to ensure that any housing and related developments within the town and its surrounds:

- contribute towards actual housing or other community needs in Burford and the West Oxfordshire AONB whilst being appropriate in their scope and location
- do not detract from Burford's heritage and the aesthetics of the town and surrounding countryside
- are feasible in respect of local highways, sewerage and drainage infrastructure
- are sustainable in their demands on local education, medical and other facilities
- reflect the diversity of need across Burford's community.

In responding to these aims, RPiB will seek to take account of:

- the needs of different demographic and income groups within our community
- the interests of residents and of local voluntary and commercial organisations.

RPiB recognises that wider strategic planning and policy making also directly affects the opportunities and decision making more locally, affecting local housing, infrastructure investments, spatial planning, and planning balance decisions in and around Burford. It therefore engages with WODC, and with county and national consultations, so that the needs of communities such as Burford can be included in decision making. RPiB also updates the community and its members about new strategies and programmes and consultations so that they are informed and have an opportunity to respond and provide their voice.

RPiB therefore is responding to this consultation as it is concerned that the Oxfordshire Plan 2050 as proposed:

- Does NOT give sufficient consideration and recognition to rural communities such as ourselves, and the rural economy on which our sustainability is reliant. There is a significant risk that the increasingly Oxford-centric, ARC-centric rhetoric that surrounds the Plan will deliver less social equity across the county than is currently experienced, completely contrary to the original intention of a county-wide spatial strategy. Rural communities and the landscape, built and cultural heritage that we represent, and which is considered a key asset on which Oxfordshire's success is based, will be at risk and unsustainable if the scale of growth and focus for the Plan remains as it is proposed.
- Is NOT delivering a process with local accountability and sufficient opportunity for locally elected voice. Of specific concern is the opacity about the degree of influence and impact of other strategies such as the ARC and LIS. For example, the recent Joint Declaration about the ARC suggests that economic growth targets for the Plan may be predetermined, making the summer consultations a paper exercise. Local councillors are not made aware in a timely manner of developments in policy that will directly affect the strategic framework that will turn dictate the scope and

opportunities of planning and policy at district and town/parish level in the longer term.

- Is putting economic growth AHEAD of environmental and social sustainability. We are a community on the edge of the county, reliant on strategies and investments that recognise the intrinsic value of the environment, heritage and landscape. It is therefore deeply worrying therefore that the Plan, and other strategies and programmes influencing the Plan, refer to Oxfordshire being a key part of an “economic engine” for the UK with investments prioritised on “focus areas for growth” that are unlikely to include our local, rural, area. Also, environmental impacts will be “minimised”, yet the scale of growth will potentially affect us all, directly (e.g. water resources capacity and quality, light pollution/impact on tranquillity and the setting of our protected landscape) or indirectly (e.g. emissions impacts on climate change). How will this Plan help our rural community?
- Is NOT collaborative. The Foreword states that the plan making process will be worked through “collaboratively”, but it is notable that the consultation differs from the draft agreed by our district council and – for example - the word “together” is removed from para 35 so the sentence now reads “*so [together - deleted] we can decide where the appropriate balances may lie.*”. RPiB assumes the “we” refers to the Growth Board, but, whatever, it certainly doesn’t now include local residents and councillors. The process needs to be reviewed urgently and challenged. Decisions and changes are being made without local elected member discussion and mandate

## Key Discussion Point Responses

### Discussion point 1 – Does the above draft vision meet your aspirations for the future of Oxfordshire? Are there any changes you would like to see to the vision?

We do not agree with the Vision set out in the bubble after paragraph 3 as it is written. There are some important changes and clarification required.

- The Vision is a general statement that could apply to anywhere in the UK.
- The County’s historic character, landscape and rural and natural environment is not sufficiently explicitly recognised and valued in the Vision, and there needs to be a commitment to respect and preserve these assets. Even with the protections afforded to some of these currently, we won’t be able to conserve or preserve, let alone enhance, Oxfordshire’s environment, landscape and townscape features if an unrestrained building programme is put in place for the next 31 years which ignores their importance or which is used to tilt the balance in planning decisions.
- The consultation document in the context section suggests how the evidence bases will be assessed and “balanced” against each other. RPiB strongly asks that heritage assets, ecosystem services and the landscape, and the employment related to maintaining their quality, must not be marginalised and should instead be included in the economic calculations with equal weight and recognition as the other listed employment sectors.
- The 25 Year Environment Plan is not adequately referenced nor embedded in the Oxfordshire Plan 2050 strategy and project structure. This is a serious omission. The Glover Review of protected landscapes, just one part of this, will potentially have

significant impact on the Oxfordshire Plan considerations and is particularly pertinent to Burford and its local communities.

- Housing policies need to deliver real options for affordability in the longer term, including social housing, for people on lower incomes especially in communities such as Burford where house prices and rental is extremely high. Simply building more new houses will not sort out affordability problems. More radical and national approaches will be needed to sort out this issue. Burford and neighbouring communities already have a problem with large numbers of second homes/holiday lets. It is reasonable to assume that some of the build in Oxfordshire could be seen as attractive, and more affordable, than living in London, increasing commuting from that city and thus not being built for or meeting existing local needs. The focus on highly skilled/knowledge based job creation also implies housing development that does not address existing need for the poorer in our communities. Reusing existing stock, re-evaluating housing densities, types and tenures and looking at social housing opportunities would be welcome alternative options.
- There is a worrying focus on high-skilled and knowledge based jobs. Job opportunities must be pursued for all abilities and appropriate to all parts of the county and its individual industries (incl the rural/agri/tourism industries) such that all in our communities can share in wealth creation.
- There needs to be a stronger commitment to climate change obligations, which are statutory and applicable to us all.
- Ecosystem services are highlighted for their essential role in human health and wellbeing yet impacts on the environment throughout the consultation document focus on mitigating adverse effect, not looking to protect and enhance it as a valuable, long term resource.

**Discussion point 2 – Do you feel that we’ve identified the right aspirations for Oxfordshire? Where do you think the balance should lie in prioritising these aspirations?**

We do not agree that the plan has the right five aspirations for Oxfordshire.

There are only two meaningful aspirations - environmental sustainability and social equity and sustainability. These reflect the needs of our communities and our reliance upon, and stewardship of, our environment for future generations.

The document discusses *where* the development should be, and how to mitigate the impacts on the environment etc. But the choices should instead focus on the environmental (and heritage) assets of the county being fundamental to the choices being made in terms of scale, or if indeed we do want to grow at all, in light of the damage it would do. The complexity, capacity and resilience of natural (and social) systems needs to be understood and put at the forefront of decision making.

These TWO Aspirations could then be delivered through various mechanisms including improving housing availability and affordability, economic growth, and improving connectivity and movement. But these are delivery mechanisms and should not be aspirations in their own right.

**Discussion point 3 – Do you feel the draft objectives are appropriate for the plan? Are there any changes or other objectives that you would like to see? Should they be bolder? Or more specific?**

- Draft Objective 1
  - Needs to add more on ecosystem services, social and cultural capital and legacy, as well as the historic built and natural environment of the county.
  - And recognise the value and benefits of these assets and protect them for future generations.
  - It should be noted that heritage is not just about physical assets, but also about social and cultural traditions. Rural character such as in the Cotswolds AONB and Burford is more than a sum of its existing built and natural features.
- Draft Objective 2
  - Needs to not only protect and enhance the County’s distinctive landscape character, recreational, ecosystem and biodiversity value by but also prioritise the protection of these assets and use their carrying capacity to define the overall scale of growth as well as its location (rather than vice versa)
  - There should be an additional objective focused on a goal of zero carbon emission by 2050.
- Draft Objective 3
  - No particular comment
- Draft Objective 4
  - This reflects the necessity to revisit the Oxford/OxCam Arc centric nature of the Plan and consider the long-term needs for all communities, including rural ones that are not central to the growth programmes and strategies that are heavily influencing the direction of this Plan.
  - Social equity, between generations and between urban and rural must be specifically assessed and provided for in investment planning, growth and opportunities.
- Draft Objective 5
  - Must include a commitment to that social equity, to our landscape and that the capacity and resilience of our ecosystem services and natural resources will not be compromised in the drive for economic growth
  - Para 46 notes that it is desirable for future generations to have access to high value, quality jobs. What about the provision of opportunities for people in our society who are unable to do highly skilled or knowledge based work?
  - Who is this Plan actually for, Oxfordshire or the UK? Sustainable economic growth is mentioned through the document but it seems questionable as to whether it is being designed with the existing residents and businesses in Burford in mind or for economic interests elsewhere, or people who may come to live here, but locate their work elsewhere.
  - We question whether the Plan will be able to deliver its proposal that “Oxfordshire will determine housing numbers and appropriate level of economic growth”. There are many other programmes and strategies influencing the outcome, including the ARC and LIS, being determined without local mandate and discussion by Oxfordshire’s communities and elected councillors.
- Draft Objective 6
  - Needs to have an explicit commitment to ensure everyone across the county will be provided for
  - Needs to also ensure growth is sustainable in the longer term and has taken into account, and is constrained by, the capacity of social and natural assets in the county and other parts of the UK.
- Draft Objectives 7 & 8
  - These objectives should be about providing housing that is needed and genuinely affordable. To suggest that housing would also be required for

people who “*recognise what a special place Oxfordshire is*” is not a reasonable argument and should not be a stated or recognised justification for affordable housing growth.

- It is misguided to assume that more housing will drive house prices down, which is not necessarily the case. Also, recent development activity shows evidence of only driving house prices down if the existing housing stock is adversely affected by that development, thereby becoming less desirable places to live
  - The latest ONS figures suggest an increase for the whole of Oxfordshire of 37,000 for 2019-2041. Given the 100,000 houses proposed in the Local Plans already, what justification can the 2050 plan have for yet further housing? This will impact all areas of Oxfordshire in some manner, including Burford. The only explanation both for this and, indeed, for 100,000 houses by 2031 is to accommodate large scale migration from other parts of GB, and particularly from London.
  - What benefit will there be for Burford and other communities in Oxfordshire by this escalated growth based on migration into the county? Burford has already had to accept more housing than data suggests it needs for its own local needs, most of which will go to meeting housing needs of other parts of the District, despite expert concerns about the effects of cumulative development on the town on school capacity and social cohesion. The affordable housing that has been delivered already in the town is housing people from outside our community and even from outside our District.
  - The Plan needs to be flexible about what local needs will be emerging between now and 2050. It should not commit to any further large-scale growth and should be prepared to revisit existing target commitments in light of emerging evidence and needs (locally and nationally).
- Draft Objective 9
    - Burford suffers from a lack of public transport links and reliance on an overcrowded A40. This will not be improved by the major growth at Eynsham. But Para 51 suggests that “*significant new pieces of infrastructure is only usually realistic where new development is delivered.*” This is concerning for those parts of the county that are not a focus for growth. What consideration will be given to ensure that these areas will not become deprived of investment and will have their own sustainability needs addressed by the Plan. It seems likely that rural areas or communities in landscapes or settlements with protected status such as Burford may be particularly vulnerable in this regard and certainly sufficient infrastructure has not been put in place to accommodate current developments affecting the A40
  - Draft Objective 10
    - This Objective is logical, but raises questions about what the role of ‘less sustainable’ rural areas will be.

**Discussion point 4: Do you agree with the commentary relating to the spatial scenarios illustrated, or do you think there are important considerations we have missed? Do you consider there are any other potential spatial scenarios we should consider? Are there any spatial scenarios you think we should avoid (please provide reasons if you can)?**

RPiB would like the additional protections afforded to the AONB to continue to be a principal consideration in spatial scenario planning, and that this should be extended such that greater weight is also afforded to the *setting* of areas with protected status and also for the creation of “green belts” around new garden villages and towns such that merging of

settlements, and cumulative growth does not erode the value of our natural environment and heritage assets.

**Discussion point 5 – Do you agree with the commentary relating to the main infrastructure issues? Are there any changes or other issues that you would like to see referred to?**

There seems to be an acknowledged significant shortfall between the billions of pounds needed for infrastructure for the 100,000 houses to 2031, and the £215million provided in the Growth Deal. This is deeply concerning and RPiB reiterates the need to revisit the growth target for even the existing Local Plans given the 2019 ONS report indicating only 37,000 houses are required in the period to 2041.

Submitted on behalf of Responsible Planning in Burford, a residents association.  
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