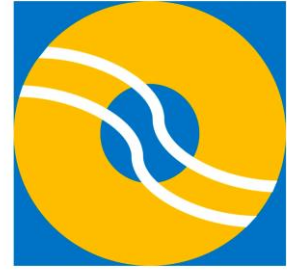


# Response to Reg 19 Consultation on Oxford 2040 Local Plan

by the Oxfordshire Doughnut Economics Collective



The 2040 Local Plan has a vision to promote research and development in Oxford which prioritizes the interests of business and landowners. The impacts of this economic growth agenda on social and environmental sustainability both locally and globally render the 2040 Local Plan unsustainable, compromising the needs of current and future generations at a time of worsening societal crises and earth systems collapse.

We have set out below a general overview of why the Local Plan is not sound or sustainable, including solutions to these issues. This is followed by an analysis of each of the 12 SA/SAE topic areas, outlining the critical negative impacts that the 2040 Local Plan would generate on environmental and societal sustainability, and how this relates to the information and claims set out in the Sustainability Appraisal.

Sustainability Appraisal: unsound - not sound, not legally compliant, does not comply with DTC

## Local Plan 2040 and the Sustainability Appraisal

### General issues

The Local Plan policies that influence sustainability and their assessment in the SA/SEA are not sound, as they are:

- not objectively assessed and lack data, meaningful indicators and specific targets to support the claims of sustainability in the SA/ SEA assessment
- not justified in considering reasonable alternatives that support a better balance between economic, social and environmental sustainability
- not effective due to lack of joint working or policies to deliver the claims of sustainability
- not consistent with sustainable development
- failing in the duty to cooperate
- breaking UK law in not being consistent with UK net zero requirement by 2050.

### General solutions

The plan should be reviewed to make the social and environmental aims of the plan's vision, along with the Oxfordshire Strategic Vision, central to all the 2040 Local Plan policies. This should be done by working with the surrounding districts to revisit the 2050 plan for Oxfordshire to ensure a future in which Oxfordshire can thrive.

The 2040 Local Plan should then be comprehensively rewritten with the aim of meeting everyone's needs within the limits of the planet, in a way that is redistributive and regenerative. The revised plan must take an Oxfordshire-wide view, as the impacts of development would be far reaching and not confined to the city. The 2050 Oxfordshire Plan must be revisited, and agreement reached that meets the Oxfordshire Vision county-wide as a priority.

Oxfordshire has a wealth of expertise and knowledge across all sectors, which should be harnessed to provide:

- relevant baseline data
- relevant key indicators and appropriate targets to cover the United Nations Sustainable Development Goals and the 9 key indicators of planetary health.
- effective monitoring of progress towards these targets, and the ability to review policies to ensure that progress is on track.

## SA/SEA topic areas

### 1. Carbon emissions

Impact: Scope 3 embodied carbon emissions (construction of buildings and associated new infrastructure) would form the majority of the carbon emissions of the 2040 Local Plan, but these are absent from the SA/SEA.

The neutral impact rating in Table 1.4 is consequently incorrect and misleading and should be revised to show a strongly negative impact.

There is a binding legal commitment to meet the UK's annual carbon budget to reach net zero by 2050. Oxford's 2040 Local Plan would have significant adverse effects in the ability to meet this commitment.

Monitoring: Both the offsetting operational carbon and the change in per capita CO2 emissions ignore the much more significant impact of embodied carbon emissions. In addition, exporting operational impacts by offsetting is undeliverable, and is unsustainable globally.

### 2. Climate Change Resilience

Impact and monitoring: The policies in the LP are not sufficiently robust to support genuine climate change resilience. In particular, for resilience to flooding mitigation, NO building should be permitted on Flood Zone 3 areas given known and current effects of climate change on sea level rises and the increasing frequency of severe rainfall events. Preventing development in FZ3 and adhering to advice from the EA should both be boundary conditions; not seen as monitoring measures.

#### Solutions

Flood Zone 2 should be included as a constraint to development  
All green spaces and mature trees should be protected

### 3. Efficient use of Land

Impact: Table 1.4 fails to register any impact of the 2040 LP on efficient use of land. Instead it states that the high housing need puts more pressure on green field sites. But the housing need arises from employment-led growth of this plan with consequent pressure on greenfield sites, both by setting aside hundreds of acres of brownfield land for thousands of new jobs, and by inflating the demand for housing.

Monitoring: Table 1.5 gives the indicator of efficient land use as 'applications permitted on protected green space' This is counter-intuitive given that 'protected' green space should signify protection from development.

#### Solutions

- employment numbers should be reduced in the plan
- employment sites should be released to meet housing need
- any opportunistic sites that become available in the city should be prioritized for housing
- housing should be of higher density (100 - 200 dpa) to preserve Oxford's remaining green spaces and conservation areas
- preservation of 'protected' green space should be a boundary condition
- monitoring could instead be measured by the number of homes located on brownfield land

4. Local housing need: see inequalities section below

#### 5. Inequalities

Impacts: It is well known that economic growth in already-developed countries **increases** inequality, as has resulted over the period of Oxford's growth in the previous Local Plan. It is no accident that Oxford and Cambridge, both University cities prioritizing growth through the development of tech over housing, are the two most unequal cities in the UK.

The inability to afford housing in the city has a major impact on inequality, and the plan will worsen the current unaffordability by:

- failing to prioritize or provide any significant solutions to meet the need for genuinely and permanently affordable housing
- prioritizing employment over the delivery of affordable housing, which will increase housing demand and house prices.
- failing to define 'affordability' in terms of affordable to key workers
- allowing 'shared ownership' to be included in the 'affordable homes' category, a scheme which is not affordable to the majority of key workers
- reducing the requirement for socially rented housing to 30% (the 2036 LP required 40%)

Solutions:

- homes should be prioritized over jobs in a city with a housing crisis but full employment
- affordability should be defined according to key-worker salary
- mechanisms should be found to prevent loss of housing for social rents into the private sector (eg: through ownership by Community Land Trusts)
- tech jobs should be located in areas of the UK where there is currently unemployment and cheaper housing consistent with leveling up

#### 6, 7. Services and facilities, leisure and recreation

Impact: Oxford's Local Plans (previous and current) are having severe impacts on community services and facilities with loss of green space and recreation areas, and reduction in the size of community centers. But Table 1.4 fails to register any impact of the 2040 Local Plan on this key infrastructure, and merely aims to prevent further loss. The planned increase in Oxford's population by 30% will lead to huge stress on the current already overstretched services and facilities, and places for leisure and recreation.

Solutions

- to be sustainable, the plan should aim to increase provision in line with planned population increase.

#### 8. Traffic and Air pollution

Impact: the SA/SEA registers a strongly positive impact on reducing traffic and air pollution despite the huge increase in commuting that will result from generation of new jobs in the

city whilst exporting the resulting housing requirement to the districts. The Oxfordshire Local Transport and Connectivity Plan aims to reduce *current* car trips in Oxfordshire by 50%, but this does not include the *new* car trips generated by the Local Plan.

#### Solutions

- balance and co-locate the number and location of jobs with the appropriate level of housing provision

### 9. Water

Impact: the SA/SEA predicts a positive impact on **water quality** despite over 9000 new homes and more than 20 000 new tech jobs. The plans for new sewage infrastructure will fall short of meeting these demands, and green infrastructure will be lost due to the allocation of greenfield sites for development. No mention is made of the impact of polluting discharges of tech labs on water quality.

A major omission in the sustainability appraisal is the effect of the LP on **fresh water withdrawals**, even though the LP acknowledges that Oxford and Oxfordshire are already under severe water stress and that this will significantly worsen the high water demands of increased bio-tech planned in the City and the demands of a 30% increase in population in the context of climate change and drought.

Monitoring: river water quality is only set to be monitored every 3 years, with the annual indicator given as 'application permitted on protected peat reserves' which should not be permitted in any circumstance, both due to the effects on water as well as carbon emissions.

#### Solutions:

- reduce development plans to those which can be managed by water infrastructure (both fresh water supply and sewage treatment)
- prevent any loss of green infrastructure
- join-up with the water quality monitoring already being performed by local communities and ensure weekly monitoring, of what has become a national scandal
- assess likely impact of new tech labs on water use and quality and revise the plan accordingly

### 10. Biodiversity:

Impacts: the plan will significantly reduce Oxford's biodiversity by

- building on greenfield sites
- reducing biodiversity on the remaining green space by fragmentation of habitats, increased air and water pollution
- failing to require a BNG above 10% (as other Local Plans are doing) as one of the most nature-depleted Counties in the UK, and the UK one of the most nature-depleted countries in the world. 10% BNG is the minimum to avoid net loss (as identified by DEFRA) and the Oxfordshire Local Nature Partnership have provided the evidence to justify more than the minimum 10% BNG requirement.

Monitoring: no target is specified for monitoring BNG and no indicator is used to prevent fragmentation of habitats

#### Solutions

- all core green infrastructure should be protected

- no green field sites should be used unless other alternatives have been exhausted
- a target of at least 30 % BNG should be applied
- connectivity of Oxford's green spaces should be preserved to avoid biodiversity loss due to habitat fragmentation.

## 11. Design and Heritage

Impacts: The plan admits to impacts in this topic due to proposed development on 19 greenfield sites and 15 conservation areas

Solutions:

- protect all greenfield sites and conservation areas to reduce the amount of the development in the city as these provide multiple benefits across social (health and wellbeing, sense of place, nature connection, equitable access) and environmental (carbon, biodiversity, flood risk, urban cooling, water quality, air pollution) topics as well as being a vital draw to visitor numbers which underpin the sustainability of the local economy
- build in principles of ongoing consultation and co-development with OLNP and OLNRS managers.
- provide proactive strategic planning for nature recovery, with a vision and targets of what will be achieved.
- develop and publish a detailed version of the Nature Recovery Network covering the Oxford City area, together with commentary on key assets and especially [irreplaceable habitats](#) as advised by DEFRA, along with directives on how to specially treat these, for example buffering from pollution sources, enhancing connectivity.

## 12. Economic growth

Impact: The plan vision to support research and development in Oxford claims that 'the plan focuses on providing housing over new employment land.'

The plan sets out to provide up to 348 000 m<sup>2</sup> floor space, 74% more homes than required by the standard method with huge impacts for Oxford on the 11 topics of the SA/ SAE as already set out here, as well as wider impacts both in Oxfordshire and globally.

There are strong social and environmental objectives included in the Local Plan vision:

*In 2040 Oxford will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. Oxford will be a city with a strong cultural identity, that respects our heritage, whilst maximising opportunities to look forwards to innovate, learn and enable businesses to prosper. The vision is one which supports research and development in the life sciences and health sectors which are and will provide solutions to global challenges. The environment will be central to everything we do; it will be more biodiverse, better connected and more resilient. We will utilise resources prudently whilst mitigating our impacts on the soil, water, and air. The city will be net zero carbon, whilst our communities, buildings and infrastructure will be resilient to the impacts of climate change and other emergencies.*

But these laudable social and environmental aspirations are not supported by the LP policies, resulting in a plan which fails to balance social, environmental and economic sustainability as required by the NPPF.

Solutions:

The research and development aspirations of Oxford University must be supported in a sustainable way by harnessing the opportunities for remote working and leveling up.