

**Oxford City Council Scrutiny Committee
Consultation Response
Oxfordshire 2050 Plan Regulation 18 (Part 1) Consultation Document
March 2019**

Introduction

1. Oxford City Council's Scrutiny Committee wishes to submit a response to the Oxfordshire 2050 Plan Regulation 18 (Part 1) Consultation. This response has been prepared in recognition that the Council as a whole will not be providing a response to the Consultation. This response has also been prepared to take account of the views expressed by the Committee, which were not otherwise sufficiently able to influence the early draft stages of the consultation document, owing to its status as a partnership document. The Committee was regrettably advised that any major changes were not possible at that stage as they had the potential to delay the consultation process.
2. The Committee is aware that the high level aspirations of the Joint Strategic Spatial Plan (JSSP), as set out in the [Introducing the Oxfordshire Plan](#) consultation document, are fundamental in ensuring the Plan is delivered to the benefit of local residents, and generations to come. These aspirations are crucial in defining what Oxfordshire will look like in the future, and set a benchmark for which later planning and development decisions will be judged by.
3. The Committee's main discussion at their meeting on 21 January 2019 focussed on the extent to which the ambitions and objectives set out in the Regulation 18 Document were broad and unspecific. It was explained that the rationale for this approach was to allow space for subsequent consultation responses to shape the detail of the document. Although the rationale for this approach is understood, the Committee believes that the document remains too unspecific, and does not highlight the importance of key themes that are fundamental to planning for the future. This makes it difficult for the public to take any kind of standpoint in relation to more specific issues that might affect them, such as climate change targets.

Climate Change and Environmental Protection

4. The Committee has a clear consensus that the aspirations set out within the 2050 Plan, together with the draft objectives, could be more consistent with international, national and local policies and targets concerning climate change.
5. To this end, the Committee is pleased to note that since reviewing a draft of the aspirations on 21 January, they have been reordered to prioritise the protection of environmental quality as the first aspiration. Other minor amendments on this matter have also been made in response to the Committee's early comments. However, the Committee believes that a more substantial effort should be made to raise the profile of climate change and environmental issues within the Plan.

6. The Climate Change Act, the Government's Clean Growth Strategy and the revised National Planning Policy Framework (among others) all set out targets or actions that should be taken to address climate change. The Committee believes that there is a disconnect between the urgent need to address climate change, and the level of detail on the issue within the consultation document. The importance of climate issues is likely only to increase over the duration of the Plan.
7. The Government's Clean Growth Strategy 2018 explains that "*Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport, and housing (p.118).*"¹
8. As recommended by the Growth Board Scrutiny Panel, the Scrutiny Committee is also of the view that the Plan should align with the Government's definition of 'clean growth,' as set out in the Clean Growth Strategy, which emphasises the need to reduce greenhouse gas emissions. This is an important opportunity to embed such specific measures from the outset across the life of the Plan.
9. There are other pertinent countywide strategies too, such as the Oxfordshire Energy Strategy, with an objective to "*to halve emissions of carbon dioxide by 2030 compared against 2008 levels (p.4).*"² More broadly, the 2050 Plan would benefit from situating the aspirations and objectives within the wider context of climatic, technological and demographic changes between now and 2050, when the Plan ends. A further example of how this theme could be better embedded through the aspirations and objectives is by setting a greenhouse gas reduction target.

Affordable and Social Housing

10. Communities in Oxfordshire continue to endure some of the highest house prices in relation to average income in the Country. This has served only to exacerbate various inequalities and underlying challenges for the County, such as rates of homelessness and deprivation.
11. The Committee has a strong view that the aspirations of the 2050 Plan need to go further to ensure there are sufficient opportunities for people to own and rent homes that are truly affordable. This includes the provision of appropriate social housing. It is recognised that the detail of how this is to be achieved does not need to be set out in the broad aspirations, but the principle of boosting affordable and social stocks must be addressed with greater conviction within the Plans.

¹ HM Government. 2017. Clean Growth Strategy. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf

² Oxfordshire County Council. 2015. Energy Strategy 2015 to 2020. Available at: https://mycouncil.oxfordshire.gov.uk/documents/s35019/CMDE_OCT1316R10.doc.pdf