

## **Representation from the Oxfordshire branch of the Campaign to Protect Rural England (CPRE)**

Dear Scrutiny Committee Members,

Oxford is host to a wide range of community, environmental and civic organisations all of whom are committed to working for a sustainable future for our amazing City.

Imagine how strong a Local Plan could be if it harnessed the passion and expertise of these groups in a co-ordinated way and genuinely involved them in the development of the Local Plan?

Instead, it seems that we are once again here in a position of tick box consultation with groups that have concerns forced into confrontation and opposition, rather than feeling that their views have been listened to, let alone taken into account. We are also surprised to see that the draft Local Plan has effectively been published, ahead of its consideration by Scrutiny.

In that context, we ask members of the Scrutiny Committee to make the following recommendations to Cabinet:

- 1. The [Regulation 18 \(2\) Consultation Response Report](#) is not considered fit for purpose and should be re-written prior to the Local Plan consultation.**
  - Should a total of approx. 100 responses be considered sufficient to establish that the consultation has been adequately conducted?
  - Why is there no indication of where the responses have come from? Are these from individuals or groups representing 100s or 1000s of Oxford residents?
  - Why is there no weighting indicated as to the level of agreement on comments? We are simply given an edited list of comments, but no indication of how many people agree to each of these.
  - Most importantly, why is there no indication of how the City Council will respond to these comments? We wonder if the Council can point to one single change to the Local Plan that it has made in response?

As an alternative approach, the Committee might like to consider this [consultation report](#) produced recently by South & Vale District Councils, alongside an [interactive issues consultation website](#). Admittedly this is at an earlier Local Plan stage, but it does set out clearly how the Councils intend to respond to comments.

- 2. A further paper on the Housing & Economic Needs Assessment (HENA) should be published alongside the Local Plan consultation giving specific responses to the detailed criticisms that have been made of this document by a wide range of statutory and non-statutory stakeholders.**

We agree that Oxford needs considerable investment in genuinely affordable housing. Nonetheless, decisions must be made on good evidence, to avoid the

unnecessary loss of green space and countryside including Green Belt, and the HENA is clearly flawed. Critical questions remain unanswered, for example:

1. Why the trajectory proposed for Oxfordshire as a whole envisages the population growing by nearly 27% by 2040, compared to Office for National Statistics estimates of a UK population increase of less than 5%?
1. Why the level of growth proposed is over 50% more than the growth experienced in the previous period?
2. Why household growth is assumed to continue at the same rate from 2019-2029 to 2029-39 when the Office for National Statistics predicts a 41% fall in the second decade?
3. Why net migration is based on a 5 year rather than 10 year average, adding 20% to the figures?

Unfortunately we are not able to attend tonight's meeting in person to read this statement. However, we ask Scrutiny Committee to give careful consideration to these matters, which are crucial to delivering a thriving Oxford, in the context of both the City and the County as a whole.

Yours faithfully

On behalf of CPRE Oxford