

Oxfordshire County Council's response to Consultation on the Mayor of London's Draft London Plan

Introduction

1. Oxfordshire is a thriving economy strategically located within the Wider South-East (WSE) with good public transport links to London, and anchoring the southern end of the Oxford-Milton Keynes-Cambridge Growth corridor.
2. Our total economic output is around £22bn a year, meaning economic output per capita is among the highest in the UK, and we make a significant net contribution to the exchequer.
3. This success brings with it challenges. Oxfordshire is the 5th least affordable housing market in the country relative to earnings, with median prices to median earnings ratio of almost 10, rising to 17 in Oxford City. The County also experiences issues with recruitment, transport congestion, and pressure on other physical and social infrastructure.
4. Through the Oxfordshire Growth Board, Oxfordshire's six local authorities and the Oxfordshire Local Economic Partnership (OxLEP) are working together on an ambitious, comprehensive and integrated approach to addressing our housing, infrastructure and economic challenges to deliver the potential of our world class knowledge economy and high quality sustainable development across the County.
5. An ambitious Strategic Economic Plan has been developed which forecasts 86,000 new jobs in the period 2011-31 and the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 identifies a need for 100,000 homes between 2011-31, based on supporting forecast economic growth. Local Plans are being put in place to provide for this scale of growth, including provision for unmet housing needs of Oxford City, and an Oxfordshire Infrastructure Strategy (OxIS) sets out the strategic infrastructure development required to support growth to 2040.
6. The National Infrastructure Commission (NIC) recognises the long-term growth potential of the Oxford-MK-Cambridge corridor but a shortage of housing, particularly affordable housing puts sustained growth at risk. To overcome this the NIC proposes public investment in infrastructure, particularly east-west transport links such as East-West Rail and the Oxford-Cambridge Expressway, aligned with a joined-up plan for new jobs, homes and infrastructure, to create well-designed and connected new settlements. Oxfordshire County Council (OCC) supports this approach in principle.
7. OCC is also party to joint work being undertaken at the sub-regional level through the England Economic Heartland alliance, including around strategic road and rail infrastructure to support economic and housing growth in the wider Oxford-MK-Cambridge corridor.
8. Following extensive engagement with government and in recognition of both the challenges and opportunities faced by Oxfordshire, government is agreeing a Housing and Growth Deal for Oxfordshire.
9. Under the terms of the Deal, government will agree to provide Oxfordshire with £215m funding for infrastructure, affordable housing and capacity funding to deliver growth, and grant certain flexibilities and freedoms. In return, the six Oxfordshire councils will commit to producing a Joint Statutory Spatial Plan (JSSP) to 2050 and to plan and support delivery of 100,000 homes by 2031. This Deal will be a major step

towards realising the housing growth potential of the Oxfordshire end of the Oxford-Milton Keynes- Cambridge arc.

10. Oxfordshire County Council (OCC) officers attend SEEC (South East England Councils) Working Groups and regularly participate in meetings with GLA officers to discuss issues of mutual interest, including the London Plan.

Scale of Housing Provision in the Plan

11. The draft London Plan provides the framework for development of the capital for the period 2019-2041 but the draft Plan does not commit to a specific overall housing target for the whole Plan period. Policy H1 and Table 4.1 only set Borough housing targets for the first ten years of the plan. The draft Plan identifies a need for 66,000 homes p.a. across London for the plan period and the Borough housing targets for the first 10 years would provide a combined total of c.65,000 homes p.a.; a plan review will therefore be necessary before 2029.
12. The draft Plan does not offer a credible long-term, strategic planning approach – it will create uncertainty about how the required 66,000 homes p.a. will be accommodated after the first ten-year period and there will be added housing pressure on London's hinterland due to the capital's inability to meet its own needs in full. The Plan should be amended to give clarity on longer term housing targets for delivery through Borough local plans.
13. Specific housing sites are to be allocated through local plans prepared by the Boroughs - the draft London Plan only identifies potential Opportunity Areas. Policy GG2 directs those involved in planning and development to make the best use of land by prioritising the development of Opportunity Areas, brownfield land, surplus public land, sites that are well-connected to tube/rail stations, in/on edge of town centres and small sites. OCC agrees that these priorities make for sound planning principles.
14. However, in addition Policy GG2 requires protection of London's open spaces, including the Green Belt. Policy G2 also proposes that protection be given to the Green Belt and says that the extension of the Green Belt will be supported, where appropriate and its de-designation will not.
15. It is OCC's view that London should consider finding more capacity in the plan period through selective Green Belt releases in the outer Boroughs, just as many authorities in the surrounding South East are currently doing to sustainably meet their own identified housing needs (and unmet needs of neighbours). In Oxfordshire, allocations in the Oxford Green Belt have been confirmed in the adopted Vale of White Horse Local Plan and significant Green Belt releases are being proposed in the emerging Cherwell and South Oxfordshire Local Plans to meet needs in the Oxfordshire Housing Market Area, including unmet needs of Oxford City.

Policy SD2: Collaboration in the Wider South East

16. OCC welcomes in principle the Mayor's proposed commitment in policy SD2 to collaborate with WSE partners to address appropriate regional/sub-regional challenges and opportunities, including solutions to shared strategic concerns such as barriers to infrastructure delivery.

Policy SD3 Growth locations in the Wider South East and Beyond

17. OCC also welcomes in principle Policy SD3 which sets out the Mayor's commitment to work with WSE partners, Government and other agencies to realise the potential

of the wider city region and beyond through investment in strategic infrastructure to support development in growth locations to meet need and secure mutual benefits.

18. Fig 2.15 highlights thirteen initial WSE Strategic Infrastructure Priorities endorsed by the WSE partners for initial delivery; it should be noted that further work is to be undertaken by WSE to refine these priorities. OCC is willing to work in partnership with the Mayor to press for funding and the accelerated delivery of strategic infrastructure. Our interest focuses on the delivery of:

- The orbital routes of the Oxford-Cambridge growth corridor - East West Rail and the Oxford-Cambridge Expressway - which would improve east-west connectivity and take the pressure of radial road and rail routes through north and west London; and
- The Great Western Mainline (London-Reading/Western rail Access to Heathrow) which will provide greater connectivity for Oxfordshire via rail services from Reading.

19. Para 2.3.4 of the draft Plan advocates a need to plan for longer term contingencies and sets out the Mayor's interest in working with *willing partners* beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital in return for support for infrastructure provision. For this approach to succeed it would be helpful if London could first demonstrate that it has explored all reasonable options for accommodating development within its boundary, including through a Green Belt review.

20. To meet commitments in the Oxfordshire Housing and Growth Deal, the Oxfordshire authorities will focus resources on:

- ensuring the delivery of 100,000 homes by 2031 to meet Oxfordshire's needs as identified in the Oxfordshire SHMA 2014; and
- the production of the Joint Statutory Spatial Plan for Oxfordshire to 2050 for adoption by 2021.

21. The SHMA's 100,000 homes for 2011-31 is based on supporting economic growth and is an up-lift of some 24,300 homes on the level of provision needed to meet demographic-based forecasts for Oxfordshire. It is reasonable to assume that a proportion of in-migrants to Oxfordshire's growing workforce will originate in London. It is also likely that a proportion of the new homes being planned in locations in Oxfordshire that have good public transport links to London eg Didcot, Bicester and close to Oxford Parkway will be occupied by London commuters. In effect Oxfordshire is already likely to be assisting in meeting London's housing needs through its current round of local plans.

Policy T3 Transport capacity, connectivity and safeguarding

22. OCC welcomes the support given in policy T3 to developing good public transport connectivity between London and the WSE and developing better national and international public transport connections. We particularly support the inclusion of 'Coach hub(s) re-provision' in the list of public transport schemes in table 10.1 which Borough local plans should provide protection for. Coach services provide frequent and convenient public transport links between Oxford and Central London to the mutual benefit of Oxfordshire and London.