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Dear Sir/Madam

### **OXFORDSHIRE PLAN 2050**

Thank you for consulting the Home Builders Federation (HBF) on the new Draft Oxfordshire Plan 2050. James Stevens, the HBF's Director for Cities, has prepared this response and he is the lead contact for all things in relation to the Oxfordshire Plan.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005.

The HBF commends the Oxfordshire authorities for cooperating on the production of the Oxfordshire Plan 2050. The HBF would like to make some comments and observations on the ideas in the Draft Oxfordshire Plan in the order in which they appear in the consultation draft. We hope that these comments will help the team to enable them to develop the next stage of the Plan.

The HBF would also be very willing to meet with the Oxfordshire planning team to discuss these representations to help it prepare the next iteration of the Plan – the part 2 regulation 18 consultation scheduled for the summer of 2019. Engagement with various stakeholders is encouraged by paragraph 16 of the NPPF (2019).

### **Introductory section**

We welcome the consultation, but we are surprised by two things in the introductory section. First, the omission of any reference to the Growth Arc is odd in the extreme. This is odd as Central Government's support for a Joint Statutory Spatial Plan and the choice of the end date for the Plan in 2050 is determined by the commitment of national and local government for the ideas behind the Arc. The production of Joint Statutory Spatial Plan was always integral to this. This has recently found expression in the document entitled *The Oxford-Cambridge Arc: Government Ambition and Joint Declaration Between Government and Local Partners* (MHCLG, 2019).



Second, the absence of any reference to this being a Joint Statutory Spatial Plan - the terminology used in the Oxfordshire Joint Statutory Spatial Plan Scoping Document (October 2018) - is also curious and not a little troubling. The *Oxford-Cambridge Arc* paper (MHCLG 2019), referred to above, does refer on page 24 to the Joint Statutory Spatial Plan for Oxfordshire. We note that Topic Paper 1 does refer to the Oxfordshire Plan 2050 as being the Joint Statutory Spatial Plan (JSSP). Paragraph 12 of Topic Paper 1, however, although it confirms that the Oxfordshire Plan is part of the statutory development plan, it refers to the Plan as a Joint Plan.

We ask, therefore, for clarification, and whether it is still the intention of the six Oxfordshire authorities to advance the Plan as a statutory document, or if it is to be A Joint Plan? If this is instead going to be advanced as a Joint Plan, then this could have important implications for the planning procedures that govern the way it will be implemented. While strategic sites can be allocated through either a spatial development strategy or a joint plan, Oxfordshire's Plan may decide that the formal allocation of a site is a matter for the local plan. The process for allocating sites, and making an application against these, therefore, needs to be clearly articulated in the next stage of the Plan (reg. 19), with reference to the NPPF.

We note in Topic Paper 1 (February 2019) that each stage of the process in the production of the Plan will require all the councils agreeing. This is similar to the process that will govern the preparation of the Greater Manchester Spatial Framework. This, though, is different from the Greater London Plan, where the Mayor has much stronger powers and is able to over-ride objections from the London boroughs. Oxfordshire does not have these powers, in part because it is not a combined authority. Yet for the Plan to be an effective planning document, it is very important that the Oxfordshire Plan does identify strategic sites, even if it does not allocate these. We note paragraph 8 of Topic Paper 1 to this effect. This will need to be made clear in the next iteration of the Draft Oxfordshire Plan.

It is also important that the Oxfordshire Plan is generous enough with its identified sites, and is supported by a strategic Green Belt review, to ensure that the Plan is flexible enough to respond to changing circumstances, as required by paragraph 11 of the NPPF (2019).

### Paragraph 3

We recognise that the current set of local plans in Oxfordshire, published after the introduction of the NPPF 2012, will need to play-out and some of these will run up to 2036. We recognise, therefore, that the extent to which the Oxfordshire Plan can influence those local plans that have already been adopted (e.g. Cherwell, Vale of White Horse, West Oxfordshire), and those that are at an advanced stage of consultation (i.e. Reg.19, as in the case of Oxford City and South Oxfordshire) may be quite limited. However, it is also the case that the adoption of the Oxfordshire Plan 2050 could require all these local plans to be updated sooner than 2031 and 2036 to reflect important new strategic objectives.

Therefore, the Oxfordshire Plan 2050 must establish a new timeline by when local plans should be updated. It should also establish a new common commencement date for the adoption of five new local plans and that the local authorities must adhere to this. We believe that this common start date should be 2023, and that the Oxfordshire Plan 2050 should initially run to 2035, but be reviewed every five years after this (to ensure that the evidence relating to development needs and transport investment is

still relevant), and that the local plans must be ready to reflect these changes in line with the Joint/Statutory Plan.

A new Oxfordshire plan 2050 should be ready for adoption by 2035. This new plan will need to include new, ambitious housing and economic growth targets for Oxfordshire to make its contribution to the Growth Arc objectives up to 2050.

This will mean that the Oxfordshire Plan 2050 and the five supporting local plans, must be drafted in such a way that they are able to accommodate possibly quite significant changes easily without too much delay and disruption. This means identifying strategic development locations and proposals for new towns/villages and reviewing the Green Belt with a view towards accommodating potential development needs up to 2050. This will require the Oxfordshire authorities to adopt a more generous approach to land-use planning than some have been used too, in contrast to the parsimonious approach that typifies much local planning, where land for development is eked-out based on unrealistic expectations around housing land supply. The Oxfordshire Plan 2050 should be genuinely strategic and able to accommodate a range of potential development scenarios. This means that local plans can also easily accommodate relatively major changes through their five-year reviews without the risk of having to commission a new evidence base each time while also avoiding the risk of third-party challenge.

We think it is necessary to adopt a phased approach. The first phase would reflect current and adopted local plans but make it clear that a fundamental new spatial strategy will be in place by 2021 guiding local plan production and decision-taking from 2023 up to 2035. This will require new local plans for all five local authorities to be prepared and adopted by 2023 to deliver against the Oxfordshire Plan 2050 strategic objectives.

The second phase would be the reparation of a new Oxfordshire Plan covering the period 2035-2050.

### **Strategic allocations: should the Oxfordshire Plan allocate?**

The chief benefit of the Oxfordshire strategic plan is that because it is part of the development plan, it can identify a range of development scenarios including broad locations for development that will benefit all of Oxfordshire and contribute to the Growth Arc objectives. It must also allocate, rather than merely identify, those specific strategic sites that are essential to deliver key objectives by 2035 and 2050. This is allowed by the NPPF (para. 23), but we acknowledge that this will be contentious and will need to be agreed by the constituent members.

We recommend strongly that Oxfordshire adopts this course. The benefit of allocating strategic sites is that this would enable planning permission to be granted for these important strategic schemes even if the local authority within which the site is located is unable or unwilling to update its local plan to reflect the spatial strategy. We feel this is vital to ensure that objectives can be achieved by the plan end.

We note however, on the basis of this Regulation 18 consultation, that Oxfordshire has decided against this approach (although this is the approach that the London Plan has taken in the past, and indeed, the new Draft London Plan goes even further in saying that local plans do need to be updated to allow planning applications to be made on strategic allocations). We note the discussion in paragraph 8 of Topic Paper 2: Spatial Strategy. It is of concern to the HBF that Oxfordshire has chosen not to make specific

strategic allocations through its Plan. It will only to identify '*broad locations for housing and economic growth*'. This will be inadequate. To be an effective planning document, the Oxfordshire Plan should allocate as well as identify those strategic sites that are critical to the attainment of key planning objectives by 2035.

If allocations can only be made by local plans there is a considerable risk that supporting local plans will not be prepared, adopted and/or updated in time to implement the wider Oxfordshire objectives. There may be insufficient time left to implement the Plan objectives by our recommended longstop dates of 2035 and 2050 (in line with our suggested two-phase approach). The Oxfordshire Plan cannot rely on local plans being produced quickly enough to deliver the objectives in full.

Since it could take a great deal of time to prepare supporting local plans this would prevent strategic sites coming forward in sufficient time – i.e. to be allocated, applications made, and then built-out in time – all the things needed to meet the Plan objectives in phases 2035 and 2050. The way to avoid this would be to require that local plan preparation occurs concurrently with the Oxfordshire Plan so that these plans are ready to be submitted and examined immediately after the Oxfordshire Plan is adopted.

We realise that this is a politically difficult issue, but Oxfordshire must grapple with this problem, otherwise the Plan will be ineffective. The Oxfordshire Growth board, through its Plan, will need to exert a grip on what is happening at the local level. Unless you have similar powers to the Mayor of London, the biggest challenge with joint and strategic planning, is persuading the constituent authorities to implement in detail the aims of the strategic plan. Therefore, engaging with local communities on this strategy is vital and much of the 'heavy lifting' will need to be done by the Oxfordshire Plan 2050 to avoid the scope for dissent and delay at the local level.

### **Relationship of the Oxfordshire plan 2050 to local plans**

The Oxfordshire Plan 2050 should include a section at the front of the Plan that explains very clearly how the Plan relates to local plan preparation, including what housing targets are used once the Plan is adopted and the status of any land identified or allocated by the Oxfordshire Plan 2050 and what that means in terms of development management decisions. The Plan will also need to explain clearly how any strategic policies are to be implemented in local plans, if these are allowed to vary from the wording of the strategic policy; how the five year land supply is to be calculated (collectively or individually); and the housing delivery test is to operate (will performance be measured individually or collectively?). We comment on this further below.

The Oxfordshire Plan 2050 should be very clear about the time-line of the Plan and when any reviews are planned, and what contingency measures will be put in place in the event of under-delivery, and what this means for local plan preparation.

### **Scope of the Oxfordshire Plan: the duty to cooperate**

The Draft Plan currently reads as an overly Oxfordshire focused document. It makes no reference to major strategic events beyond its border. The Plan will need to clearly explain how the duty to cooperate will operate in Oxfordshire. Oxfordshire will need to explain what its responsibilities are through the Plan in terms of discharging the duty to cooperate, including the preparation of statements of common ground.

We note paragraphs 7-10 of Topic Paper 1. This says that a statement of common ground was signed in March 2018. A new statement of common ground will need to be prepared to support the Draft Oxfordshire Plan 2050 to show effective cooperation under the duty to cooperate. This is not only a matter internal to Oxfordshire but to show how the Oxfordshire Plan is responding to events outside the county, particularly developments associated with the Growth Arc. As we have stated above, it is disquieting that consultation draft makes no reference to this major national initiative.

The preparation of the statutory spatial strategy for Oxfordshire provides the ideal opportunity to work more effectively with other bodies across the Growth Arc, such as the Cambridgeshire and Peterborough Combined Authority and the Mayor of London. Cooperation must be a key part of the strategic plan.

This needs to be rectified. It is highly likely that the Oxfordshire Plan will need to account for the development implications of major transport investments, such as East-West Rail and the Expressway, and unmet housing needs in other local authorities and combined authority areas, and how this may affect how much development Oxfordshire will need to accommodate in the future. This is true particularly in respect of London's development pressures and this has been acknowledged by the South West Strategic Leaders and South East England Council's in their statements to the Draft London Plan examination. They acknowledge that they need to work with the Mayor of London to explore if there is potential to accommodate more growth in, or transfer of industrial land uses, to the wider South East. This commitment to explore the potential, even if it is not an actual commitment to provide, should be reflected in the Draft Oxfordshire Plan.

The emerging Plan will need to grapple with the duty to cooperate and how strategic cross-boundary issues have influenced its shape and content.

### **Sustainability Assessment / Habitats Regulations Assessment**

We recommend that the Oxfordshire Plan 2050 does as much as possible of the 'heavy lifting' as possible in terms of compliance with other statutory requirements. This would enable supporting local plans to be prepared and adopted as quickly as possible. This would avoid the possibility of litigation at the local plan level which might frustrate and delay the implementation of the Plan objectives.

### **Housing need**

We note Topic Paper 4 and the section titled 'Delivering enough housing to meet need'. The current SHMA 2014 identifies a need to deliver 100,000 homes by 2031 and this is the basis for the current round of local plans. We note paragraph 9 which states that the Oxfordshire authorities will need to prepare new housing needs evidence. This evidence will be informed by the standard method and other 'up-to-date' evidence. Part of this evidence should reflect upon the need to support the delivery of the Growth Arc objectives for the period 2025-2050. This evidence should inform the Oxfordshire Plan 2050. In order to deliver the Government's aim to provide one million high quality new homes across the Arc by 2050 (see the *Ministerial Foreword to The Oxford-Cambridge Arc*) relying on the standard method alone is unlikely to be enough, just as the baseline household projections informing the SHMA 2014 were insufficient for the current round of Oxfordshire local plans.

We are aware that the 'Joint Declaration of Ambition between Government and the Arc' (contained on pages 7 and 8 of the *The Oxford-Cambridge Arc* paper) does not

refer to the one million new homes figure, only 'significantly more homes in the Arc'. Box 2.1: National Infrastructure Commission (on page 13) does refer to one million homes, reflecting its original vision for the corridor. We note that this consultation draft is non-committal on the number of homes to be provided by Oxfordshire up to 2050. The next Draft Oxfordshire 2050 Plan should explain what Oxfordshire's intentions are in planning for housing up to 2035 and then 2050 (in line with our recommendation for a two-phase approach) and whether the county considers that it should provide for more homes than the minimum indicated using the standard method to play its part in delivering one million homes. Whatever figure is proposed, this will need to be kept under close review to reflect the adopted and emerging local plans among the other 16 local authorities of the Arc (21 local planning authorities – see page 10 of *The Oxford-Cambridge Arc* paper) and the plans of the Cambridgeshire and Peterborough Combined Authority.

The Cambridgeshire and Peterborough Combined Authority Non-Statutory Spatial Plan summarises that across the six local authorities of the combined authority area some 100,000 homes are proposed up to 2036. Oxfordshire and the Cambridgeshire and Peterborough Combined Authority anchor both ends of the Growth Arc and the transport investment projects should bring significant benefits to both regions. Both bodies, therefore, should continue to liaise closely over their respective plans, to ensure that each is making a commitment to new housing supply, commensurate with these investments.

The Plan should also take account of the conclusions from the Draft London Plan examination that is currently ongoing and any evidence of a shortfall of supply relative to need in the capital. London's special housing problems will continue to be an issue, and this will continue to exert an influence on future drafts of the Oxfordshire Plan. Even if the new Draft London Plan is found to be sound, it is likely that there will be a requirement for an early review of the London Plan to reflect the new standard method and evidence of delivery challenges (there is great deal of scepticism among stakeholders of all persuasions about the ability of the new London Plan to deliver 66,000 homes a year), and this may provide evidence of a major shortfall in housing capacity in London. Oxfordshire, therefore, will need to engage with the Mayor of London, and other bodies, under the duty to cooperate, to explore the potential for Oxfordshire to accommodate some of London's unmet housing needs. This would be in accordance with the National Infrastructure Commission's original vision for the Arc which was that it would provide some relief for London's housing pressures.

This is a matter that Oxfordshire will need to monitor and explore through the duty to cooperate and its statements of common ground. It cannot ignore this issue or deny that there is a problem. The development industry will be scrutinising this issue carefully.

### **Apportionment of the housing need**

We note paragraph 10 and the intention that following the new assessment of housing need, the Oxfordshire Plan will then apportion this among the five local authorities. This is one of the benefits of spatial planning and the Oxfordshire proposal follows the example set by the London Plan and the Greater Manchester Spatial Strategy (although, by contrast, the forthcoming Liverpool Spatial Plan will expect each of its constituent members to meet their own housing needs within their own administrative areas).

The HBF supports this approach but careful consideration will need to be given to the timescales relating to the delivery of strategic allocations and the performance of the local authorities in delivering their share of the overall need (their own plan requirement). Oxfordshire should prepare contingency options in case delivery shows signs of faltering significantly in some of the local authority areas, and it should be ready to adopt these alternative spatial options through the examination of a revised Oxfordshire Plan. It is essential that the Oxfordshire Plan is kept under review and that it is reviewed every five years to respond to changing events.

As we have argued above, we recommend that the housing land supply is not so tightly drawn that delivery depends on a few large sites. A range of housing sites across a broad geographic area and of varying sizes should be identified (para. 68 and 72 of the NPPF).

For maximum planning flexibility (NPPF, para.11), the Oxfordshire Plan 2050 could identify a 'preferred' delivery scenario which provides the policy basis for development management decisions up to 2035, but also a contingency scenario that could come into play and replace the preferred delivery scenario in the event of delivery failure. Incorporating a contingency delivery scenario into the Oxfordshire Plan would obviate the need for a costly and time-consuming review of the Plan if this is needed sooner than five year review advocated by the NPPF (para. 33).

If Oxfordshire does not like the idea of a contingency spatial option included in the Plan that it could default to if delivery falters, then it will need to monitor delivery closely and be poised to intervene with a revised Plan. The trigger for submitting a new Plan (the new Plan ought to be in preparation) would be when housing delivery for Oxfordshire falls below 75% of the housing required for the last three years (see Annex 1 of the NPPF).

### **Five-year land supply and the housing delivery test**

Oxfordshire will need to decide how it will plan for its five-year housing supply and how performance will be measured under the housing delivery test. It will need to make this clear in the Oxfordshire Plan 2050. This is consistent with the PPG and the *Housing Delivery Test Measurement Rule Book*. The PPG states at Paragraph: 046 Reference ID: 3-046-20180913, Revision date: 13 09 2018:

#### ***“How will areas with joint plans be monitored for the purposes of a 5-year land supply?”***

*Areas which have or are involved in the production of joint plans have the option to monitor their 5-year land supply and have the Housing Delivery Test applied over the whole of the joint planning area or on a single authority basis. The approach to using individual or combined housing requirement figures will be established through the plan-making process and will need to be set out in the strategic policies.*

*Where the 5-year land supply is to be measured on a single authority basis, annual housing requirement figures for the joint planning area will need to be apportioned to each area in the plan. If the area is monitored jointly, any policy consequences of under-delivery or lack of 5-year land supply will also apply jointly.”*

The HBF does not have a strong view either way, but whether land supply and delivery is measured collectively or individually, it will need to be clearly expressed in the Plan.

## **Strategic Green Belt Review**

The Oxfordshire Plan should be supported by a review that establishes new Green Belt boundaries.

Although Green Belt land can only be formerly de-designated through a new local plan (NPPF, para.136), the Oxfordshire Plan 2050 should be informed by a strategic Green Belt review that looks to the long-term needs of the county up to 2050. This review must enable strategic development locations, including new towns and villages, transport projects etc, to come forward with the minimum of delay and dispute. This will avoid disputes at the local plan level and different interpretations of intentions. Ideally, the review should revise Green Belt boundaries so that these will not need to be reviewed again until after 2050, but we acknowledge that such foresight might be impossible. Therefore, the Green Belt Review should consider what revisions are necessary to accommodate identified development needs up to at least 2035 (our recommended phase 1).

## **Affordable housing**

We note Draft Objective 7 and the importance attached to increasing the supply of affordable housing. How the Oxfordshire Plan 2050 contributes to the achievement of this objective should be discussed with various stakeholder groups including local communities and housebuilders themselves. Often the supply of affordable housing competes with other planning objectives, not least CIL contributions towards public transport. Improvements to public transport will be a critical objective of the Plan and Oxfordshire will need to make sure that contributions can be sustained. Subject to its discussions with local communities, Oxfordshire will need to decide whether it should adopt an affordable housing target and percentage requirements for all Oxfordshire (like the London Plan) or whether it will leave how much affordable housing is required to the discretion of each planning authority (like Greater Manchester).

Given the complexities associated with carrying out accurate viability testing at the strategic county-wide level, Oxfordshire might want to explore the merits of allowing the local authorities to determine appropriate levels of affordable housing, balancing this against other planning policy requirements. This would allow, for example, the Vale of White Horse, to prioritise contributions to public transport over affordable housing, if that is what the local population wants. The converse might be the case in Cherwell.

Like the Greater Manchester Spatial Framework, Oxfordshire, could identify a strategic target for 'X' number of affordable homes out of the overall need for 100,000 homes, but allow each local authority to determine its own local policy approach in terms of a percentage requirement and the preferred tenure split. Oxfordshire should monitor performance in the delivery of affordable homes through a Key Performance Indicator.

## **Viability assessment**

The Oxfordshire Plan 2050 will need to be underpinned by a viability assessment if it is going to make policy on matters such as affordable housing, public transport requirements, accessible and adaptable homes, energy efficiency etc. This is necessary to ensure that the Plan is deliverable. Oxfordshire will need to ensure that those strategic sites identified in the Plan are capable of being developed without delay and that delivery is not threatened or delayed by policy requirements that have not been properly and realistically tested at the plan preparation stage. This is a new and



challenging requirement of the NPPF, and it is important that local communities are not left disappointed owing to unrealistic policy expectations.

## **Summary**

The Oxfordshire authorities will need to be much greater attention to the relationship between the Oxfordshire Plan 2050 and supporting local plans. It is necessary to remove as much as possible any scope for dispute and delay in how the Plan is implemented by the constituent local authority members.

### **Discussion point 1: Vision for the Oxfordshire Plan**

We broadly support the vision articulated. It would be helpful if this was amended to refer to the need to cater for people of all ages, including older people. We recommend that the sentence beginning “A wide range...” is amended to read “The Plan will provide for a wide range of secure and good quality housing options for all ages that are within reach for all.”

### **Discussion point 2: Draft Plan Objectives**

We note the draft objectives. All seem to be reasonable ones and the Oxfordshire Plan 2050 will be central to achieving net gains in all these areas. However, in terms of absolute priorities, draft objectives 5 (economy), 7 (housing), 9 and 10 (public transport) appear to be the most critical. It will be important to invest in public transport network to unlock strategic locations for housing and employment. Draft Objective 8 may not be the most pressing priority. We are not sure that this objective warrants the status of a strategic objective. Many of these issues listed in this Draft Objective will be addressed either through by the Building Regulations (e.g. the Future homes Standard announced in the Spring statement) or else can be explored through non-strategic (i.e. local plan) policies.

### **Discussion point 3: Do the objectives need to be bolder or more specific?**

The objectives are appropriate for the Plan and they are sufficient to convey the priorities for Oxfordshire. They will need to be under-pinned by relevant and more detailed strategic policies that will set-out what needs to be done in more detail to guide applications and decisions.

We recommend that these supporting polices are clear but not overly detailed (avoid being like the new Draft London Plan). Each policy should explain what is required from plan-makers and from applicants. Each policy should be clear if there are cases where a local authority can interpret the policy at the local level, or vary from the policy. For example, the Plan may state something like the following:

*“By 2035, we have calculated that some 40,000 net affordable homes will need to be provided to address needs. This is equivalent to a rate of 40%.*

#### Plan-makers

*To help achieve this strategic target, local planning authorities will need to establish their own affordable housing targets based on evidence of what can be viably achieved while ensuring that contributions can be provided towards other planning objectives. This percentage target should be included in the local plan until it is reviewed.*

*Each local authority, with reference to national policy, should set-out its preferred tenure split.”*

Or, based on evidence, Oxfordshire may wish to specify an affordable housing target and tenure split for all of Oxfordshire. This would have the benefit of becoming a 'fixed' element in the local plan viability assessment, requiring all other elements to flex.

#### **Discussion Point 4: Potential Spatial Scenarios**

As a membership organisation we cannot comment on what might represent the most appropriate spatial scenario. However, housing delivery is supported best when local authorities allocate sites across a wide geographic area, and of varying sizes. This approach is supported by the new NPPF with its emphasis on site diversification and allocating small sites (albeit this would not be a strategic matter that the Oxfordshire Plan will need address). Generally, however, the spatial strategy should reflect the infrastructure plan and the investment decisions of the Growth Arc.

There will be a need to provide new homes in all the principal settlements and the villages. Ideally, Oxfordshire should allow, or at least explore, how every village, town and its city, can grow commensurately with existing or future planned services.

As we have discussed above, Oxfordshire should monitor the success of its preferred spatial strategy and be prepared to adopt a different strategy if this shows signs of failing. Ideally, this should be written-into the Oxfordshire Plan to avoid the need for a costly and time-consuming review.

#### **Discussion Point 5: Infrastructure**

We note paragraph 63 and its reference to East-West Rail and the Expressway transport projects. This is the only inference in the consultation document to the Growth Arc project. The next version of the Plan should refer to the Growth Arc and explain how the Oxfordshire Plan will support other local plans and strategies throughout the rest of the Arc.

The construction of new infrastructure - and transport infrastructure in particular – will be critical to the success of Oxfordshire's Plan and assisting growth across the wider political geography of the Arc. We note the support in para. 66 for the preparation of a Strategic Infrastructure Tariff (SIT). This is something that the Government will now allow in areas outside of Greater London. The HBF supports the adoption of a SIT for Oxfordshire to help fund critical strategic infrastructure projects. However, whether there will be enough money to collect, once the local authorities have defined their local policies and set their own community infrastructure levies (CIL), is a point that needs to be explored by the Oxfordshire councils. This raises a question of policy priorities. It will be one of the functions of the Oxfordshire Plan to establish these priorities clearly. We suggest that the chief priorities for Oxfordshire should be the provision of affordable housing and contributions and a levy towards public transport projects. Energy and digital connectivity are matters that will be, and should be, addressed through the building regulations, including those revisions that will be made through the Government's Future Homes Standard activities. It is therefore unnecessary for Oxfordshire to make policy in these areas.

Yours faithfully

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