

**WEST OXFORDSHIRE DISTRICT COUNCIL**  
**ECONOMIC AND SOCIAL OVERVIEW AND SCRUTINY COMMITTEE:**  
**THURSDAY 22 NOVEMBER 2018**  
**OXFORD CITY LOCAL PLAN 2016 - 2036**  
**REPORT OF THE HEAD OF PLANNING AND STRATEGIC HOUSING**

(Contact: Chris Hargraves Tel: (01993) 861686)

**I. PURPOSE**

To consider and respond to Oxford City's Proposed Submission Draft Local Plan (2016 – 2036).

**2. RECOMMENDATION**

To note the contents of the report and agree that the comments attached in the [Appendix](#) are forwarded to Cabinet for its consideration and agreement for submission to Oxford City Council.

**3. BACKGROUND**

- 3.1. Oxford City Council is in the process of preparing a new Local Plan that will cover the period 2016 – 2036. Preparatory work began in January 2016 with a 'First Steps' consultation published from June – August 2016.
- 3.2. Views were sought on a range of high-level issues including housing provision, jobs and skills, use of natural resources, transport and movement, health and well-being, greenspace provision, heritage, shopping and leisure.
- 3.3. Subsequently, the City Council published a 'Preferred Options' document from June to August 2017. This contained a series of proposed policy approaches, or 'options' relating to various issues but no specific policies.
- 3.4. Issues addressed included the protection and use of employment sites, the level of housing provision (including unmet housing need and affordable housing) housing mix and type, indoor and outdoor building and space standards, use of previously developed land, density of development, Green Belt, energy and water efficiency, renewable and low carbon energy, flood risk, health, air quality, green space provision and design including building heights.
- 3.5. Taking account of these two previous informal rounds of consultation the City Council has now published the final pre-submission draft version of its Local Plan. This is the version that it proposes to submit to Government for independent examination and it important that West Oxfordshire District Council responds as appropriate.
- 3.6. The consultation period runs for 6-weeks from **1 November – 13 December 2018**.
- 3.7. Following the close of the consultation period, the City Council will collate all of the comments received and submit these together with the Local Plan and supporting evidence in March 2019 for independent examination. This is consistent with one of the milestones set out in the Oxfordshire Housing and Growth Deal.
- 3.8. Section 4 below provides a high-level overview of the pre-submission draft Local Plan with any key implications for West Oxfordshire highlighted as appropriate. This should be read in the context of the proposed draft response attached in the [Appendix](#) (beginning on page 12).

#### **4. OXFORD CITY LOCAL PLAN 2036 – OVERVIEW OF KEY CONTENT**

- 4.1. The plan is split into 9 main chapters and includes 126 separate policies on various issues including 66 policies relating to specific areas of change/site allocations. 41 of the policies in the plan are defined as ‘strategic’ in the context of the new NPPF (i.e. those which are necessary to address the strategic priorities of the area and any relevant cross-boundary issues).

##### **Vision**

- 4.2. The proposed vision for the Local Plan is linked to the existing City Council Vision 2050. Oxford will be a global centre for the knowledge-based economy, and all residents will benefit from the strong economy. Deprivation and inequality will be reduced, Oxford’s diverse communities will have a strong sense of togetherness and people will be able to live fulfilled, happy and healthy lives. Oxford will be an affordable place to live. It will also have an attractive, clean and healthy environment, where heritage and the natural environment are protected.
- 4.3. The vision is underpinned by a series of more specific objectives relating to issues such as education and skills, employment, energy efficiency, climate change, design, green space provision, health and air quality.

##### *Commentary/response*

- 4.4. The vision and overall objectives are broadly supported but could be strengthened to more clearly set out the City Council’s intentions regarding the delivery of new high quality homes to meet identified needs over the plan period.
- 4.5. There is some mention of housing affordability and providing a range of housing types, sizes and tenures to meet identified needs but this could be bolstered further with a stronger commitment to maximising the opportunities to deliver new housing in Oxford in the period to 2036.

##### **Spatial Strategy**

- 4.6. The proposed spatial strategy is to focus development on the City Centre, District Centres and transport nodes as the most sustainable and well-connected locations for new development. The plan identifies 12 main community/transport hubs which offer a mix of different uses and will be the primary focus for future growth.
- 4.7. This overall spatial strategy is underpinned by a number of key elements/objectives relating to the economy, housing, natural resources, green spaces and waterways, heritage and design, transport and movement and community facilities and services.

##### *Commentary/response*

- 4.8. The proposed spatial strategy is supported in principle. Focusing the majority of future development at a series of well-connected ‘hubs’ is a logical approach that should help to reduce the need to travel and also facilitate the use of public transport, walking and cycling for those that do need to travel.
- 4.9. The overall objectives are also broadly supported in particular the commitment that is made in the plan to delivering as much housing as possible whilst balancing other important needs of the City’s residents and businesses.
- 4.10. It is essential that the City Council maximises the delivery of their own identified housing needs as, in principle, Oxford is the most sustainable location for housing to meet Oxford’s needs. This will also help to reduce the quantum of any ‘unmet’ need that may need to be accommodated in neighbouring authorities.

- 4.11. However, as set out in relation to Section 9 of the plan below, it appears that the stated intention of maximising housing delivery has not been translated through the proposed site allocations.

### **Building on Oxford's economic strengths and ensuring prosperity and opportunities for all**

- 4.12. This section of the plan focuses on the economy and includes four policies (E1 – E4) the most significant of which is E1 which relates to the provision and protection of employment land.
- 4.13. It is notable that the plan does not allocate any additional employment land but instead aims to protect the most important existing employment sites and to facilitate their intensification and modernisation to meet future needs.
- 4.14. The policy adopts a 'sequential' approach which affords the most important 'Category 1' employment sites the most protection from other uses, whilst allowing less important Category 2 and 3 sites go to other uses such as housing subject to certain criteria.
- 4.15. Policy E2 allows for improvements to teaching and research facilities whilst E3 seeks to control the amount of academic or administrative floorspace for private colleges and language schools so that they do not restrict opportunities for other uses including housing and employment. Policy E4 seeks to ensure that larger development proposals help contribute towards improving local training and job opportunities e.g. through the use of community employment plans.

#### *Commentary/response*

- 4.16. The overall approach is generally supported although it is surprising that the plan does not allocate any new employment land when the supporting evidence identifies a need for around 135,000m<sup>2</sup> of additional floorspace in the period 2016 – 2036.
- 4.17. Whilst Northern Gateway will deliver some additional employment space, it is not clear how the overall requirement will be delivered through the intensification and modernisation of existing employment sites alone, particularly if some less important employment sites are lost to other uses.
- 4.18. It may be that the business/science park element of the Oxfordshire Cotswolds Garden Village could play a role in meeting some of this employment floorspace need.
- 4.19. The plan seeks to build on Oxford's economic strengths as one of its key objectives, but appears to adopt an approach based on consolidating what already exists rather than proactively planning for future growth.
- 4.20. The requirement for larger development proposals to consider training and employment opportunities for local people e.g. through community employment plans, is supported.

### **A pleasant place to live, delivering housing with a mixed and balanced community**

- 4.21. This section of the plan deals with housing and includes 16 policies (H1 – H16) on various issues the most important of which being the overall level of housing provision which is addressed under H1.
- 4.22. To summarise, the plan seeks to make provision for at least 8,620 new homes in the period 2016 – 2036 (436 homes per year). This is a very similar level of provision to that set out in the adopted Oxford Core Strategy which seeks to provide 8,000 homes in the period 2006 – 2026 (400 homes per year).
- 4.23. Delivery will be achieved through site allocations, promoting the efficient use and development of land/sites including higher densities and building heights and ensuring

that all new housing developments contribute to the creation and/or maintenance of mixed and balanced communities.

- 4.24. Importantly, the proposed level of provision is based on anticipated capacity rather than identified need.
- 4.25. To inform the Local Plan, the City Council commissioned 'roll-forward' of the Oxfordshire Strategic Housing Market Assessment (SHMA) published in 2014. This has been published alongside the Local Plan as supporting evidence and suggests that in order to meet Oxford's affordable housing need in full, there is a need for 1,356 new homes per year. This is very similar to the previous SHMA mid-point figure for Oxford of 1,400 per year.
- 4.26. The City Council have not used the Government's new standard methodology for calculating housing need stating that there are exceptional circumstances to justify the use of an alternative approach, in particular consistency with the Local Plans of the other Oxfordshire local authorities and the Oxfordshire Housing and Growth Deal which commits funding to help deliver the level of growth identified in the previous SHMA.
- 4.27. The most significant implication of this approach is the creation of 'unmet' housing need that the City Council is unable to meet within its own administrative boundaries.
- 4.28. Members will be aware that in the recently adopted West Oxfordshire Local Plan 2031, provision is made for 2,750 homes in the period 2021 – 2031 to assist with Oxford's unmet housing need. This derived from an agreed 'working assumption' that the overall level of unmet housing need across Oxfordshire in the period 2011 – 2031 was 15,000 homes.
- 4.29. The SHMA roll-forward and capacity based approach set out in the new Oxford Local Plan creates further unmet housing need that has direct implications for the other Oxfordshire local authorities.
- 4.30. The assumed level of provision in the period 2016 – 2036 is 8,620 homes and the identified need is 28,000 (i.e. 1,400 x 20 years). This essentially creates an 'unmet' need of 19,380 homes.
- 4.31. Whilst a proportion of this is already accounted for through existing and emerging Local Plans in Oxfordshire, it means that further assistance from the adjoining Oxfordshire authorities may be sought for example through the proposed Joint Statutory Spatial Plan (JSSP) for Oxfordshire which will cover the period to 2050.

*Commentary/response*

- 4.32. West Oxfordshire District Council has not been involved in the commissioning or scoping of Oxford City's 'roll-forward' of the Oxfordshire SHMA and Officers have only recently had sight of the report. It will clearly be for the City Council and its consultants to justify the evidence and approach taken at examination.
- 4.33. The forthcoming JSSP will need to be supported by evidence of housing need – including for the period 2031 – 2050. This may or may not identify a similar level of housing need for Oxford and thus until it has been prepared, there is a concern that the evidence prepared in support of the Oxford Local Plan (commissioned by Oxford alone) could either under or over-state the quantum of housing that is needed.
- 4.34. With regard to the 'housing target' of the Oxford Local Plan, the proposed capacity based approach is a reasonable one. It is clear that unless there is a significant reduction in the identified level of housing need, the plan will need to be based on expected housing delivery (i.e. capacity) rather than identified need. There would be no sense in

setting a housing target of say 28,000 homes (if that is the correct figure) if there was no realistic prospect of it being delivered.

- 4.35. Having said that, at just 431 homes per year the proposed level of provision is very modest and despite the assurances given in the plan about opportunities to deliver more housing being maximised, in reality it is a marginal increase from the 400 homes per year target set out in the existing Oxford Core Strategy.
- 4.36. It is therefore questionable whether the City Council has genuinely left no stone unturned in preparing the plan and identifying suitable housing sites for allocation, particularly as around 12% of the anticipated capacity is expected to come from unallocated 'windfall' sites.
- 4.37. This will of course be a matter for the Local Plan Inspector to consider when the issues of housing need and capacity are considered through the examination process.
- 4.38. The remaining policies in this section of the plan (H2 – H16) deal with a range of different housing related matters including affordable housing, housing mix, loss of housing, houses in multiple occupation, community led housing and self-build, student accommodation, accessible and adaptable homes, older persons and specialist housing, travelling communities, boat dwellers and residential standards.
- 4.39. Having reviewed these policies, none of them raise any particular concerns. It is notable that in respect of affordable housing (a critically important issue for Oxford) the plan identifies a number of specific sites upon which permission will be granted for employer-linked affordable housing.
- 4.40. In other words, on named sites employers can address their own recruitment and retention issues on their own land by providing housing for their employees at a rent that is affordable to them. This is an innovative approach and is supported in principle.
- 4.41. Also supported are proposals to deliver more community-led housing projects and self-build housing with the plan adopting a similar approach to the West Oxfordshire Local Plan in requiring larger development proposals to include an element of self-build (5% on sites of 50 or more residential units).
- 4.42. The plan also seeks to increase the supply of accessible and adaptable homes as well as older persons and specialist supported housing. No provision is made for travelling communities because the supporting evidence base does not identify any demand.
- 4.43. Notably, the plan includes a policy that requires all new residential developments to achieve the Government's national space standards – this is an optional standard that falls outside the remit of building regulations and is for local authorities to justify and adopt through their Local Plans. The plan also includes a complementary policy on outdoor space standards requiring for example houses of 1 or more bedrooms to provide a private garden of adequate size and proportions for the size of house proposed.

#### **Making wise use of our resources and securing a good quality local environment**

- 4.44. This section of the plan deals with the use of natural resources and includes nine policies (RE1 – RE9) dealing with various issues.
- 4.45. Of particular note is Policy RE1 which focuses on sustainable design and construction in new development. Other than householder applications, all residential developments will be required to achieve at least a 40% reduction in carbon emissions from a code compliant base case (i.e. the amount of reduction in carbon emissions from regulated energy beyond Part L of the 2013 building regulations or equivalent future legislation).

This reduction is to be secured through on-site renewable energy and other low carbon technologies and/or energy efficiency measures. From 2026 the requirement will increase to at least a 50% reduction in carbon emissions and from 2030 onwards, development will be expected to be zero carbon. The policy also requires new residential development to meet the optional building standard for water efficiency.

- 4.46. Policy RE2 relates to the efficient use of land with permission only granted for development that makes efficient use of land e.g. through appropriate density, building heights and massing. The policy expects high-density development (i.e. 100 dwellings per hectare) in the City Centre and District Centres.
- 4.47. Policy RE5 relates to health and well-being and requires all major development proposals to be supported by a Health Impact Assessment to maximise the opportunities for promoting healthy lifestyles through the development.

*Commentary/response*

- 4.48. Policy RE1 is supported in seeking to reduce carbon emissions from new residential and non-residential development and in requiring higher standards of water efficiency. The latter is in line with the West Oxfordshire Local Plan 2031 which includes the same requirement.
- 4.49. The overall objective of Policy RE2 to ensure the efficient use of land is supported and the indicative requirement for high density development in the City and District Centres is welcomed however it is considered that the policy should go further and stipulate a requirement for high-density development in all of the 12 'community/transport hubs' shown on the Spatial Strategy Diagram in Section 1 including the six identified 'areas of change'.
- 4.50. The policy should also identify a minimum density (or range of densities) to be achieved in other parts of the City. This would help to ensure that the maximum possible number of new homes are provided within Oxford to meet identified needs.
- 4.51. The requirement to submit a Health Impact Assessment for larger proposals under Policy RE5 is supported in principle.

**Protecting and enhancing Oxford's green and blue infrastructure network**

- 4.52. This section of the plan relates to the natural environment with a particular focus on green and blue infrastructure (i.e. open space and watercourses). It includes nine policies (G1 – G9) dealing with various issues including the protection and provision of open space, protection of biodiversity and geo-diversity, Green Belt, protection of allotments, protection of outdoor sports facilities and development involving garden land.

*Commentary/response*

- 4.53. The policies are in line with national policy and in a number of respects are similar to those set out in the West Oxfordshire Local Plan for example the protection of biodiversity and geodiversity.
- 4.54. Policy G4 relates to allotments and seeks to ensure such facilities are not lost to other forms of development. Whilst the general principle of the policy is supported, it should be re-worded to allow for the potential re-location/re-provision of allotments where appropriate. This could enable sustainable development proposals to come forward with no net loss of allotment facilities and potentially an improvement.
- 4.55. Policy G6 allows for residential development to come forward in private garden land in appropriate circumstances. The general principle of the policy is supported insofar as it

is essential that opportunities for new housing development within Oxford are maximised in order to meet identified needs.

### **Enhancing Oxford's heritage and creating high quality new development**

- 4.56. This section of the plan relates to the built environment and heritage. It includes 7 policies (DH1 – DH7) on various issues including design, views and building heights, heritage assets, archaeology, shopfronts and signage and external servicing and storage (bikes, bins etc.)
- 4.57. Policy DH2 is of particular note and relates to views and building heights – essentially seeking to ensure that significant views within Oxford and from outside are retained and protected from inappropriate development. In short, planning permission will not be granted for any building or structure that would harm the special significance of Oxford's historic skyline. Permission will be granted for developments of appropriate height or massing subject to a number of specific criteria.

#### *Commentary/Response*

- 4.58. Policy DH2 is of particular interest because it seeks to control building height and massing which in turn has an effect on the amount of development that can come forward within the City. In simple terms, an overly restrictive approach could be seen as minimising the opportunity for new development in some locations and thus increasing the likelihood of some of Oxford's identified needs having to be met in adjoining areas.
- 4.59. In this instance, the policy is clearly worded and appears to be supported by evidence including a separate technical guidance note on high buildings. However, it is considered that the policy should be amended to recognise the potential for higher buildings within District Centres and on arterial roads.
- 4.60. This is referred to in the supporting text to Policy DH2 but is not set out in the policy itself and should be. It could also refer to the potential for high buildings in the six 'areas of change' identified in Section 1 and shown on the Spatial Strategy Diagram.

### **Ensuring efficient movement into and around the city**

- 4.61. This section of the plan deals with transport and movement and includes 5 policies (M1 – M5) on various issues including the prioritisation of walking, cycling and public transport, assessing new developments through Transport Assessments, parking (motor vehicles and cycles) and the provision of electric charging points in new residential developments.
- 4.62. Notably, Policy M3 stipulates that in certain circumstances, planning permission will only be granted for residential development that is car-free (i.e. no parking spaces provided). In other circumstances, maximum standards for parking will be applied. Planning permission for non-residential developments will only be granted if it is demonstrated that there will be no increase in parking provision.
- 4.63. Policy M4 states that where additional parking is provided in accordance with Policy M3, permission will only be granted for new residential developments if provision is made for electric charging points for each residential unit with an allocated parking space and non-allocated spaces are provided with at least 25% (with a minimum of 2) having electric charging points installed. Non-residential developments will only be permitted if a minimum of 25% of the spaces are provided with electric charging points.

#### *Commentary/response*

- 4.64. The policies raise no specific concerns. The requirements for electric vehicle charging points is supported as is the emphasis placed on car-free developments given the

availability of walking, cycling and public transport opportunities in Oxford. This will enable a higher density of development as a consequence of the reduced area devoted to car parking in development sites.

### **Providing communities with facilities and services and ensuring Oxford is a vibrant and enjoyable city to live in and visit**

4.65. This section of the plan focuses on community services and facilities. It includes 8 policies (V1 – V8) dealing with a number of issues including the vitality of the city, district and local centres, shopping frontages, the Covered Market, tourism, cultural and social activities, social and community infrastructure and utilities.

#### *Commentary/response*

4.66. The policies are supported in principle and raise no specific concerns.

### **Areas of Change and Site Allocations**

4.67. Section 9 of the plan includes 66 site allocations (SP1 – SP66) covering a range of different uses including residential, employment, retail and education.

4.68. 23 of these sites (SP1 – SP23) are within nine designated 'Areas of Change' as follows:

- West End and Osney Mead (2 site allocations)
- Cowley Centre District Centre (1 site allocation)
- Blackbird Leys District Centre (1 site allocation)
- East Oxford-Cowley Road District Centre (no site allocations)
- Summertown District Centre (3 site allocations)
- Headington District Centre (no site allocations)
- Cowley Branch Line (9 site allocations)
- Marston Road (3 site allocations)
- Old Road (4 site allocations)

4.69. 8 small sites are proposed with the Green Belt (SP24 – SP31) and 35 sites are proposed elsewhere across the City (SP32 – SP66).

4.70. The 66 proposed site allocations are predominantly intended for residential use but also include some mixed-use development, employment uses, education, leisure, medical, retail and student accommodation.

#### *Commentary/response*

4.71. The intention to allocate sites through the Oxford Local Plan is supported in principle as it is essential that the City Council does all it can to meet its own identified development needs within its own administrative boundaries.

4.72. However, upon reviewing the proposed site allocations and supporting background evidence, it appears that the City Council has not necessarily done all it can to maximise housing delivery within the plan period.

4.73. Whilst it is accepted that not all sites should be turned over to housing, where there are genuine and sustainable opportunities, these should be taken.

4.74. In this regard, whilst the release of some Green Belt land is welcome, the number of sites that have been allocated is small (8) and the number of new homes that would be provided (c. 800 units) is marginal when set against the overall level of identified housing need (28,000 units).



- 4.75. It is also noticeable that of the remaining site allocations, a number of the larger sites are proposed for 'non-residential' uses including SP8 – SPI I (employment uses) and SP20 – SP23 and SP42 (medical uses).
- 4.76. One of the sites (SP8) has been submitted to the City Council for both employment and housing use, however, in allocating the site through the Local Plan, the Council has allocated it for employment use only.
- 4.77. Sites SP20, SP21 and SP23 have all been identified as being suitable for residential development in the Council's Housing and Employment Land Availability Assessment (HELAA) but the site allocations are predominantly for medical uses with only a small element of employer-linked housing.
- 4.78. Three large employment sites (SP9 – SPI I) have been identified as having no residential potential within the HELAA but this is in light of their importance as employment sites rather than their suitability for residential use.
- 4.79. The sites have therefore been allocated for employment use only with no reference made to residential potential even as part of mixed-use development.
- 4.80. Another site (SP22) has been identified as being unsuitable for residential development in the Council's HELAA but the reason is not clear. The potential for residential development is mentioned given the status of the site as previously developed land but the overall conclusion is that it is not suitable and hence the allocation is for medical use only.
- 4.81. Finally, it appears that a number of sites identified as being potentially suitable for residential development in the Council's HELAA have not been allocated in the Local Plan. An example is Ruskin Field (HELAA site 463) which is identified as being suitable for around 40 dwellings but has not been allocated. The reason for this is unclear.
- 4.82. As a general observation, the Local Plan does not make clear the anticipated housing capacity of each of the site allocations where residential uses are proposed. Whilst it is possible to identify likely site capacity to an extent by cross-referring to the Council's separate HELAA study, this is not always possible and it would be clearer if an indicative dwelling number (or range) were to be given for each allocated site that includes an element of residential use.
- 4.83. To summarise, the proposed intention to allocate sites to meet identified development needs is supported however, it appears that the City Council has not done all it can to maximise housing delivery within its own administrative boundaries and should therefore seek to:
- Consider the necessary release of any further Green Belt sites that may be suitable for residential development;
  - Re-consider the potential for housing as part of mixed-use development on the larger employment sites (SP8 – SPI I);
  - Maximise housing delivery on sites SP20, SP21, SP23 as part of mixed-use development with health uses;
  - Reconsider the potential for residential use as part of mixed-use development with health uses on site SP22;
  - Ensure that all sites identified as being suitable for residential use in the City Council's HELAA are allocated for residential use in the Local Plan with proper

consideration given to how any delivery constraints (e.g. land assembly) can be overcome; and

- Provide greater clarity regarding the anticipated dwelling numbers (or range of dwelling numbers) on each allocated site.

## **5. NEXT STEPS**

- 5.1. Subject to any comments made by Economic and Social Overview and Scrutiny Committee, the proposed response included in the [Appendix](#) will be considered by Cabinet and subject to its agreement, will be sent to Oxford City Council.
- 5.2. The City Council is currently proposing to submit the plan for examination in March 2019. Examination hearing sessions will then take place in summer 2019 with West Oxfordshire District Council able to participate in that process.

## **6. ALTERNATIVES/OPTIONS**

None.

## **7. FINANCIAL IMPLICATIONS**

None arising directly from this report.

## **8. RISKS**

If the District Council does not make any representations on the Oxford City Local Plan at this stage, Officers will not have the right to appear at any subsequent Local Plan examination hearing sessions.

## **9. REASONS**

Policies and proposals set out in the Oxford City Local Plan have implications for all Oxfordshire local authorities and it is important that West Oxfordshire District Council responds accordingly.

Giles Hughes  
Head of Paid Service/Head of Planning and Strategic Housing

(Author: Chris Hargraves, Tel: (01993) 861686; EMail: [chris.hargraves@westoxon.gov.uk](mailto:chris.hargraves@westoxon.gov.uk))  
Date: 13 November 2018

### Background Papers:

Oxford City Local Plan 2036 – Proposed submission draft

[https://www.oxford.gov.uk/downloads/file/5101/oxford\\_local\\_plan\\_2036\\_-\\_proposed\\_submission\\_draft](https://www.oxford.gov.uk/downloads/file/5101/oxford_local_plan_2036_-_proposed_submission_draft)

**Suggested draft response to Oxford City Local Plan 2036**

Dear Sir/Madam

**Oxford City Local Plan - 2036**

Thank you for the opportunity to respond to the Oxford City Local Plan 2036. West Oxfordshire District Council welcomes the progress being made in bringing forward a new Local Plan and is generally supportive of the pre-submission draft as published.

The plan reads well and whilst lengthy is clear and concise in setting out its various aims and objectives, policies and proposals. There are however some areas which raise potential concerns and these are highlighted below.

*Vision and Objectives*

The vision and overall objectives are broadly supported but could usefully be strengthened to more clearly set out the City Council's intentions regarding the delivery of new high quality homes to meet identified needs over the plan period.

Whilst there is some mention of housing affordability and providing a range of housing types, sizes and tenures to meet identified needs, this should be bolstered further with a stronger commitment to maximising the opportunities to deliver new housing in Oxford in the period to 2036.

*1 - Spatial Strategy*

The proposed spatial strategy is supported in principle. Focusing the majority of future development at a series of well-connected 'hubs' is a logical approach that should help to reduce the need to travel and also facilitate the use of public transport, walking and cycling for those that do need to travel.

The overall objectives are also broadly supported, in particular the commitment that is made in the plan to delivering as much housing as possible whilst balancing other important needs of the City's residents and businesses. It is essential that the City Council maximises the delivery of its own identified housing needs in order to reduce the quantum of any 'unmet' need that may need to be accommodated in neighbouring authorities.

However, as set out in relation to Section 9 below, it appears that this stated intention has not been translated through the proposed site allocations.

*2 - Building on Oxford's economic strengths and ensuring prosperity and opportunities for all*

The overall approach is generally supported although the District Council finds it surprising that the plan does not allocate any new employment land (other than the intensification of existing uses/areas) when the supporting evidence identifies a need for around 135,000m<sup>2</sup> of additional floorspace in the period 2016 – 2036.

Whilst Northern Gateway will deliver some additional employment space, it is not clear how the overall requirement will be delivered through the intensification and modernisation of existing employment sites alone, particularly if some less important employment sites are lost to other uses.

It may be that the business/science park element of the Oxfordshire Cotswolds Garden Village could play a role in meeting some of this employment floorspace need.

In short, the plan seeks to build on Oxford's economic strengths as one of its key objectives, but appears to adopt an approach based on consolidating what already exists rather than proactively planning for future growth.

The requirement for larger development proposals to consider training and employment opportunities for local people e.g. through community employment plans, is supported.

### *3 - A pleasant place to live, delivering housing with a mixed and balanced community*

West Oxfordshire District Council has not been involved in the commissioning or scoping of Oxford City's 'roll-forward' of the Oxfordshire SHMA and Officers have only recently had sight of the report. It will clearly be for the City Council and its consultants to justify the evidence and approach taken at examination.

The proposed Joint Statutory Spatial Plan (JSSP) will need to be supported by evidence of housing need – including for the period 2031 – 2050. This may or may not identify a similar level of housing need for Oxford and thus until it has been prepared, there is a concern that the evidence prepared in support of the Oxford Local Plan could either under or over-state the quantum of housing that is needed.

West Oxfordshire District Council has agreed through its Local Plan to contribute 2,750 homes towards the unmet housing needs of Oxford based on a working assumption of 15,000 homes. It will be for the JSSP process to determine any further unmet housing need and how it should be apportioned between the local authorities.

With regard to the 'housing target', the proposed capacity based approach is a reasonable one. It is clear that unless there is a significant reduction in the identified level of housing need, the plan needs to be based on expected housing delivery (i.e. capacity) rather than identified need.

Having said that, at just 431 homes per year the proposed level of provision is very modest and despite the assurances given in the plan about opportunities to deliver more housing being maximised, in reality it is a marginal increase from the 400 homes per year target set out in the existing Oxford Core Strategy.

It is therefore questionable whether the City Council has genuinely left no stone unturned in preparing the plan and identifying suitable housing sites for allocation, particularly as around 12% of the anticipated capacity is expected to come from unallocated 'windfall' sites.

The remaining policies in this section of the plan (H2 – H16) deal with a range of different housing related matters including affordable housing, housing mix, loss of housing, houses in multiple occupation, community led housing and self-build, student accommodation, accessible and adaptable homes, older persons and specialist housing, travelling communities, boat dwellers and residential standards.

Having reviewed these policies, none of them raise any particular concerns. It is notable that in respect of affordable housing (a critically important issue for Oxford) the plan identifies a number of specific sites upon which permission will be granted for employer-linked affordable housing. This is an innovative approach and is supported in principle.

Also supported are proposals to deliver more community-led housing projects and self-build housing with the plan adopting a similar approach to the West Oxfordshire Local Plan in requiring larger development proposals to include an element of self-build (5% on sites of 50 or more residential units).

#### *4 - Making wise use of our resources and securing a good quality local environment*

Policy RE1 is supported in seeking to reduce carbon emissions from new residential and non-residential development and in requiring higher standards of water efficiency. The latter is in line with the West Oxfordshire Local Plan 2031 which includes the same requirement.

The overall objective of Policy RE2 to ensure the efficient use of land is supported and the indicative requirement for high density development in the City and District Centres is welcomed, however it is considered that the policy should go further and stipulate a requirement for high-density development in all of the 12 'community/transport hubs' shown on the Spatial Strategy Diagram including the six identified 'areas of change'.

The policy should also identify a minimum density (or range of densities) to be achieved in other parts of the City. This would help to ensure that the maximum possible number of new homes are provided within Oxford to meet identified needs.

The requirement to submit a Health Impact Assessment for larger proposals under Policy RE5 is supported in principle.

#### *5 - Protecting and enhancing Oxford's green and blue infrastructure network*

The policies are in line with national policy and in a number of respects are similar to those set out in the West Oxfordshire Local Plan, for example the protection of biodiversity and geodiversity.

Policy G4 relates to allotments and seeks to ensure such facilities are not lost to other forms of development. Whilst the general principle of the policy is supported, it should be re-worded to allow for the potential re-location/re-provision of allotments where appropriate. This could enable sustainable development proposals to come forward with no net loss of allotment facilities and potentially an improvement.

Policy G6 allows for residential development to come forward in private garden land in appropriate circumstances. The general principle of the policy is supported insofar as it is essential that opportunities for new housing development within Oxford are maximised in order to meet identified needs.

#### *6 - Enhancing Oxford's heritage and creating high quality new development*

Policy DH2 is of particular interest because it seeks to control building height and massing which in turn has an effect on the amount of development that can come forward within the City.

The policy is clearly worded and appears to be supported by evidence including a separate technical guidance note on high buildings. However, it is considered that the policy should be amended to recognise the potential for higher buildings within District Centres and on arterial roads.

This is referred to in the supporting text to Policy DH2 but is not set out in the policy itself and should be. It could also refer to the potential for high buildings in the six 'areas of change' identified in Section 1 and shown on the Spatial Strategy Diagram.

#### *7 - Ensuring efficient movement into and around the city*

The requirements for electric vehicle charging points is supported as is the emphasis placed on car-free developments given the availability of walking, cycling and public transport opportunities in Oxford.

*8 - Providing communities with facilities and services and ensuring Oxford is a vibrant and enjoyable city to live in and visit*

The policies are supported in principle and raise no specific concerns.

*9 - Areas of Change and Site Allocations*

The intention to allocate sites through the Oxford Local Plan is supported in principle as it is essential that the City Council does all it can to meet its own identified development needs within its own administrative boundaries.

However, upon reviewing the proposed site allocations and supporting background evidence, it appears that the City Council has not necessarily done all it can to maximise housing delivery within the plan period.

Whilst it is accepted that not all sites should be turned over to housing, where there are genuine and sustainable opportunities, these should be taken.

In this regard, whilst the release of some Green Belt land is welcome, the number of sites that have been allocated is small (8) and the number of new homes that would be provided (c. 800 units) is marginal when set against the overall level of identified housing need (28,000 units).

It is also noticeable that of the remaining site allocations, a number of the larger sites are proposed for 'non-residential' uses including SP8 – SPI I (employment uses) and SP20 – SP23 and SP42 (medical uses).

One of the sites (SP8) has been submitted to the City Council for both employment and housing use, however, in allocating the site through the Local Plan, the Council has allocated it for employment use only.

Sites SP20, SP21 and SP23 have all been identified as being suitable for residential development in the Council's Housing and Employment Land Availability Assessment (HELAA) but the site allocations are predominantly for medical uses with only a small element of employer-linked housing.

Three large employment sites (SP9 – SPI I) have been identified as having no residential potential within the HELAA but this is in light of their importance as employment sites rather than their suitability for residential use.

The sites have therefore been allocated for employment use only with no reference made to residential potential even as part of mixed-use development.

Another site (SP22) has been identified as being unsuitable for residential development in the Council's HELAA but the reason is not clear. The potential for residential development is mentioned given the status of the site as previously developed land but the overall conclusion is that it is not suitable and hence the allocation is for medical use only.

Finally, it appears that a number of sites identified as being potentially suitable for residential development in the Council's HELAA have not been allocated in the Local Plan. An example is Ruskin Field (HELAA site 463) which is identified as being suitable for around 40 dwellings but has not been allocated. The reason for this is unclear.

As a general observation, the Local Plan does not make clear the anticipated housing capacity of each of the site allocations where residential uses are proposed. Whilst it is possible to identify likely site capacity to an extent by cross-referring to the Council's separate HELAA study, this is not always possible and it would be clearer if an indicative dwelling number (or range) were to be given for each allocated site that includes an element of residential use.

To summarise, the proposed intention to allocate sites to meet identified development needs is supported however, it appears that the City Council has not done all it can to maximise housing delivery within its own administrative boundaries and should therefore seek to:

- Consider the necessary release of any further Green Belt sites that may be suitable for residential development;
- Re-consider the potential for housing as part of mixed-use development on the larger employment sites (SP8 – SP11);
- Maximise housing delivery on sites SP20, SP21, SP23 as part of mixed-use development with health uses;
- Reconsider the potential for residential use as part of mixed-use development with health uses on site SP22;
- Ensure that all sites identified as being suitable for residential use in the City Council's HELAA are allocated for residential use in the Local Plan with proper consideration given to how any delivery constraints (e.g. land assembly) can be overcome; and
- Provide greater clarity regarding the anticipated dwelling numbers (or range of dwelling numbers) on each allocated site.

I trust you find the attached comments helpful. Please feel free to contact me if you wish to discuss anything or if anything is unclear.

Please note that the District Council wishes to be involved in any subsequent examination hearing sessions given the inter-relationships between the two authorities.

Yours faithfully

*Chris Hargraves*  
*Planning Policy Manager*  
*West Oxfordshire District Council*