

Planning and Strategic Housing

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Dear Sir/ Madam

Oxford Local Plan 2040 – Preferred Options consultation

Thank you for the opportunity to comment on the Oxford Local Plan 2040 (Preferred Options paper) which will shape how the Oxford develops to 2040.

Firstly, we very much welcome the progress being made by Oxford City Council on the Local Plan and we look forward to continued partnership working as this Plan and other key documents progress.

Our Observations

We found the paper to be well written and presented in the main. The approach of providing the preferred approach for each policy alongside other options with an explanation of the pros and cons is considered to be very informative. However, the paper could be made more succinct in areas and some of the policies could potentially be combined in the interests of brevity.

We note that a strong emphasis has been included on the concept of the 15-minute city whereby residents are able to reach a wide range of facilities within a 15-minute walk of their home. Whilst we are fully supportive of this concept, we feel that it could be more strongly linked within the plan to the broader concept of healthy place shaping which aims to make it easier for everyone to enjoy healthy, happy and sustainable lives through safe, convenient and equitable access to local communities, services and green space.

We also consider that the plan needs to have a much stronger emphasis on the relationship between Oxford and the rest of the County. As a key service centre, there are very strong relationships between the City and the rest of the County in terms of the economy and travel movements. The opportunities and issues facing Oxford cannot be addressed properly in isolation without considering the wider geography. As we know, Oxford draws in many people for work, leisure and healthcare so excellent connectivity into, out of and across the city is vital, particularly given the car free aspirations of the city. This is particularly the case given that some of Oxford's housing need is being developed outside of the city boundary and employment space is planned to help support this housing including the proposed Science and Technology Park at Salt Cross Garden Village near Eynsham.

Finally, there could be more emphasis on the opportunities that the post-Covid world presents in terms of advances in digital connectivity and flexible working arrangements and how the Plan can support this.

Set out below are some specific observations which we hope you find helpful and constructive. For ease of reference, our comments are set out in relation to each of the main chapters.

Introduction and Chapter 1: Vision and Strategy

We note that the policies are based on six key themes, which stem from the environment, social and economy. The objectives of the plan set out in more detail how the plan will seek to achieve the vision for the city and there is also three overarching threads including addressing climate change, reducing inequalities and the 15 minute city concept. The strategic spatial policies are based on these objectives and overarching threads.

The SWOT analysis on page 7 onwards is very useful but we consider that under community, culture and living, the affordability of housing should be clearly identified as a weakness. It would also be useful to have an analysis of transport and movement related issues here, for example private car use, public transport patronage etc.

Whilst we support the overall intentions of the proposed vision on page 10, it should reference the Oxfordshire Strategic Vision produced by the Future Oxfordshire Partnership which sets out the ambition for the county and will be used to help create an agreed set of long-term, strategic economic, infrastructure and environmental priorities. This Vision has been agreed by all the Oxfordshire Authorities and therefore individual documents should have regard to this. In addition, we consider that the proposed vision should have a stronger emphasis on design quality.

In terms of the Objectives and Strategy on page 11 onwards, we would like to make the following observations:

A Healthy, Inclusive City to Live in

The objectives should more fully emphasise the need for higher densities of development, making the most efficient use of land, mixed-use development and re-use of previously developed land.

A prosperous city with a globally important role in learning, knowledge and in learning, knowledge and innovation

This section should also more fully recognise the role and importance of mixed-use development. It's important not to consider employment sites in isolation.

A green, biodiverse city that is resilient to climate change

We question whether the objectives should include a clearer quantifiable target for BNG rather than a general commitment to achieving it. At the very least, it should reference the 10% benchmark of the Environment Act.

Turning to the Overarching Threads on page 15, these are supported in principle but the relationship with the main themes and objectives discussed previously is confusing.

Below are some comments in relation to the strategic policy options. In addition to these, we would suggest that an overarching policy option on high quality design should be included given the Government's expectations as set out in the National Design Guide and National Model Design Code.

Strategic Policy Option Set S1: Directing new development to the right locations.

This provides an overarching spatial policy which sets out a strategy for where different types of new development can be located.

We agree with this approach, provided that this recognises that sites outside of the City boundary will likely be more remote from services and facilities and with less frequent public transport.

Whilst we support the 15-minute city concept, no alternatives appear to have been considered and set out here for comment.

Policy Option Set S2: Approach to greenfield sites.

The preferred approach is to assess all greenfield sites whilst directing development away from protected greenfield sites but without a blanket protection of these. This includes a review of the Green Belt to assess whether there are any sites that could come forward whilst maximising efficient use on brownfield sites.

Again, we broadly agree with this approach including the need to assess sites in the Green Belt alongside sites further afield to meet Oxford's housing need. Obviously any assessment would need to consider the impact on the integrity of the remaining Green Belt.

Another option which could be considered is a hybrid approach which makes less distinction between greenfield and brownfield sites and instead encourages the use of both in appropriate circumstances/locations with a preference for/focus on brownfield.

Strategic Policy Option Set S3: Infrastructure consideration in new development.

This policy sets out that it will seek the physical, social, and environmental infrastructure required to support new developments.

This policy approach could more fully emphasise the importance of timing/phasing of delivery of supporting infrastructure.

In relation to future growth and proposed development up to 2040, it is important that this strategic policy is aligned to other closely related policy options, for example policies which relate to climate change, flooding, and sustainable travel.

Strategic Policy Option Set S4: Viability Considerations.

This policy sets out that if an applicant can demonstrate particular circumstances that justify the need for it, a viability assessment may be carried out and submitted by the applicant

We question whether this policy is required given that viability should be established at the plan-making stage. Whilst some flexibility is obviously needed, it might be more sensible to address this in individual policies which have an impact on viability (e.g. affordable housing) rather than a 'catch-all' policy. This would reflect the fact that the vast majority of schemes should meet the policy requirements in full as established at the plan-making stage.

Strategic Policy Option Set 5 – Presumption in favour of sustainable development

We question whether this policy is required given that the Government's PPG on plan-making confirms that there is no need for local plans to include a policy on this as it essentially duplicates the NPPF.

Chapter 2: A Healthy inclusive city to live in

Firstly, we note that Oxford City Council consider that circumstances are likely to exist in Oxfordshire that justify using an alternative method to calculate housing need rather than by using the standard method as set out in National Planning Policy Guidance due to Oxford's role in the local and national economy.

Para 2.5 and 2.6 both refer to the standard method but it would be useful to set out here what that figure is for Oxford and how that relates to/compares with the other Oxfordshire LPAs for context.

Below are some comments in relation to the strategic policy options:

Policy Option Set H1: Housing requirement for the plan period.

Option 'a' which is the preferred approach sets a capacity-based/constraint-based housing requirement of 9,147 dwellings over the plan period 2020 – 2040. It is not clear where this number has been drawn from but we assume it is from a HELAA assessment given that it is so precise. It equates to around 450 new homes per annum which is only marginally higher than long-term trends in the City.

We consider that a more ambitious approach must be pursued, otherwise the inevitable consequence is that a high proportion of 'yet to be identified' housing needs will likely need to be met elsewhere with the most suitable spatially well-related sites already identified through existing local plans.

Options 'a' and 'b' are presented as mutually exclusive but a hybrid option should be pursued. Such an approach would recognise the extent of identified housing need for Oxford, commit to meeting it as fully as possible/reasonable and should set out an appropriate housing requirement for the City to be met through the plan along with the extent of unmet need that is expected to be accommodated elsewhere.

Further discussions with neighbouring authorities will clearly be needed to reach an agreed position on the level of identified housing need for Oxford and the extent and apportionment of any need which is unable to be met within the City's administrative boundaries.

Before those discussions take place, it is essential that the City Council commits to meeting as much of its own housing need as possible. Without this, increased levels of development will take place beyond the City's boundaries, leading to increased commuting and inevitable worsening of congestion on key routes such as the A40 and A34.

This would create a conflict with the plan's emphasis on the promotion of the 15-minute city as well as with the Central Oxfordshire Travel Plan (COTP) which promotes '*A travel hierarchy prioritising sustainable travel and promoting 20-minute neighbourhoods where everything people need for their daily lives can be found within a 20-minute walk.*'

Policy Option Set H2: Housing need for the plan period.

The text under Option 'a' explains that circumstances exist in Oxford and Oxfordshire that justify alternative methods of calculating housing need. However, in the absence of further agreed evidence of need that statement is considered to be premature.

It is essential that the Oxfordshire authorities work in partnership to identify the most appropriate level of housing need including any potential 'uplift' from the standard method.

Furthermore, the text under Option 'b' refers to meeting affordable housing need in full but no-where is there a recognition that this may not be possible or desirable. Forthcoming housing needs evidence is likely to identify a significant level of affordable housing need and whilst there may well be a case for uplifting the standard method figure to account for a proportion of it, there should not be an expectation that this can or should be met in full.

Given the stated intention to carry forward a capacity-based housing requirement figure, the inevitable consequence of seeking to meet Oxford's (significant) affordable need in full will be the displacement of large numbers of new homes elsewhere where it will have far less benefit in terms of aiding affordability in the city and will increase commuting and congestion.

Policy Option Set H3: Affordable Housing. Overall requirement.

This policy sets out six affordable housing options.

The Government's First Homes policy is under scrutiny with some Local Authorities seeking legal advice on this. As such, option 'b' may be preferable as First Homes could still potentially be a route to delivering the intermediate housing.

Policy Option Set H6: Mix of housing sizes

Policy Option 'a' refers to affordable housing mix being informed by the housing register and other factors but makes no reference to evidence of affordable housing need which will presumably have an influence.

Policy Option 'b' is cited as being potentially overly prescriptive but this is not necessarily the case. A carefully drafted policy could still set out reasonable expectations for the size of both market and affordable homes whilst avoiding being overly precise or onerous.

Policy Option Set H12 – Gypsy and traveller accommodation

Policy Option 'b' suggests there is no justification for making specific allocations but in the absence of evidence which is yet to be prepared, this statement seems premature.

Whilst many plans include criteria-based policies (i.e. policy option 'a'), clearly making a specific site allocation, whilst often controversial, will more clearly enable and support delivery of provision to meet any identified needs.

Policy Option Set I4 – Elderly H14: Elderly persons' accommodation and other specialist housing needs

This again refers to the use of criteria-based policies or general support but in reality, providers of older persons housing are often unable to compete with mainstream housebuilders which means limited or no schemes coming forward.

The new local plan would appear to provide a good opportunity to specifically identify/allocate sites for older persons housing either in whole or in part alongside other forms of accommodation.

Policy Option Set I5 – Self and Custom Build

Policy Option 'a' places an emphasis on larger development proposals setting aside a proportion of the total site area for self-build. Whilst this approach is reasonable and reflects many other local plans, given that the majority of residential development coming forward in Oxford is small-scale, it is questionable how many self-build opportunities this policy will actually support.

It may be more effective to complement this approach with the specific allocation of smaller sites (or a proportion of them) for the purposes of self and custom build.

This could also be combined with Option 'c' setting out criteria by which any speculative proposals will be considered.

Policy Option Set I6 – Community Led Housing

As with self and custom build, a policy which offers 'general support' for such uses is unlikely to translate into delivery on the ground. A stronger approach should be considered such as Option 'b' or potentially the allocation of specific sites (or parts of sites) for community-led housing.

Chapter 3: A prosperous city with a globally important role in learning, knowledge and innovation

The introduction to this chapter sets out the nature of Oxford's economy and the supporting text provides a useful summary leading to each policy. This chapter could be made more informative still by providing some case studies or well-presented and easy to understand statistics.

We note at paragraph 3.4 the reference to Oxford being the most sustainable location for employment in the county but do not necessarily accept that to be the case. Indeed, the City could be considered a less sustainable location if new employment sites there increase congestion and commuting into Oxford.

Instead, the best location in the county should be considered on a case-by-case basis and an attempt made to 'co-locate' housing and employment wherever possible and appropriate.

Business parks outside the City could still tap into the county's thriving knowledge economy and at the same time be more accessible locations for some residents.

Below are some specific comments in relation to some of the proposed policies:

Policy Option E1: Employment Strategy

We support option (a) which acknowledges that in some instances, it will be preferable to prioritise housing and other uses over employment as well as the potential for some housing to come forward on employment sites. As set out above, it is essential that Oxford does all it can to meet its own housing needs and such an approach is consistent with that objective.

One of the effects of Covid-19 may well be that less office space is required by some businesses located in the City, creating opportunities for conversion of sites from commercial to housing, and thus more accommodation of housing need within the City than otherwise considered. The City Council should consider these trends as part of its consideration of housing need and land supply.

We note that the plan identifies as a negative consequence, the potential overspill of employment need into adjoining areas and can confirm that the District Council is willing to engage in further discussions and joint-working on this issue as the Oxford Local Plan and our own new Local Plan move forward.

Policy Option E5: Warehousing and storage uses.

We broadly support the proposed approach and recognise that land needs to be prioritised for more efficient uses in many cases. However, it should be recognised more strongly that there will still be a need for this use within the City and traditional distribution warehouses should not be displaced to the districts unless appropriate. It is implied that B8 uses are only appropriate where these are supporting the operational use of category one sites but this may be overly restrictive as online shopping requires local storage and distribution if it is to be sustainable.

The concept of freight consolidation centres is supported but this needs to be developed further going forward including how this will be delivered.

Policy Option E6: Employment and Skills Plans.

We agree that this needs to be a policy requirement rather than just encouraged. Perhaps further consideration could be given to the type/ scale of development which will require employment and skills plans as it may not be applicable to all major developments.

Policy Option E7: Affordable workspace.

More information on how affordable workspace is defined would be useful. Presumably if it is 'affordable', the rent is less than market rent? Affordable workspace tends to be found in older buildings which have been converted and therefore it may not be difficult to viably incorporate these into large commercial developments.

Policy Option E9: Short Stay Accommodation.

We have some initial concerns that the approach of letting the market decide may have an impact on tourist accommodation in the city and be detrimental to the wider tourism economy in the County.

Chapter 4: A Green, biodiverse city that is resilient to climate change

We welcome the five specific objectives listed. The importance of creating a resilient city is paramount as the effects of climate change take hold. Whilst it is crucial that measures are incorporated to tackle climate change, we are already seeing the effects and therefore resilience is crucial.

Below are some specific comments in relation to some of the proposed policies:

Policy Option Set G1: Protection of GI network and green features.

We support the preferred options (a in combination with b and c). This includes the identification of a network of green and blue infrastructure for protection, informed by the green infrastructure study.

Policy Option Set G2: Provision of new GI features.

The preferred policy approach of requiring GI on all developments using a bespoke approach appears sensible given that many development sites in Oxford are smaller in nature. This approach can also help to provide shade and has multiple social and environmental benefits.

Policy Option Set G4: Delivering mandatory net gains in biodiversity in Oxford.

The preferred option sets out a hierarchy for how 10% net gain should be delivered, particularly where on-site net gain is not possible. Requiring higher than 10% net gain is not considered to be realistic or deliverable. We question whether there is scope to consider a higher percentage in particular parts of the city or where sites have been taken forward outside of the city to meet unmet housing need.

Chapter 5: A city that utilises its resources with care, protects the air, water and soil and aims for net zero carbon.

We welcome the introductory text which sets out the importance of being careful to utilise resources and the need to work towards net zero carbon. The diagrams help to illustrate this.

Below are some specific comments in relation to some of the proposed policies:

Policy Option Set R1: Net zero buildings in operation

Building fabric needs to be designed to standards of ultra-low energy demand. To achieve this, energy budgets (EUI targets) could be set, such as, Residential <35 kwh/m2.yr and Community space (e.g. healthcare) <100 kwh/m2.yr. To meet these targets, predictive energy modelling could be used, for example Passive House Planning Package, CIBSE TM54 or equivalent

Development needs to move away from a reliance on fossil fuels and become fossil fuel free.

The aim should be to achieve net zero operational (regulated and unregulated energy) carbon balance, with 100% of energy consumption delivered through onsite or near site renewables.

Thermal comfort and the risk of overheating should be assessed and passive design measures to mitigate overheating risk prioritised over energy intensive alternatives.

Policy Option Set R2: Embodied carbon

Embodied carbon emissions should be minimised and lifecycle modelling carried out to assess embodied carbon. Embodied carbon targets should be set, for example by aligning with the LETI Embodied Carbon Primer: Supplementary guidance to the Climate Emergency Design Guide.

Policy Option Set R3: Retrofitting existing buildings including heritage assets.

It is critical that existing buildings are retrofitted if we are to achieve Net Zero, and are retrofitted to a high standard so that they do not need to be retrofitted twice. We should be targeting energy consumption reductions of 60-80% for the average home. This is achievable through a whole house approach upgrading the building fabric, incorporating energy efficiency measures, improving ventilation and fitting heat pumps.

Notwithstanding this, we recognise that careful attention needs to be applied to retrofitting heritage assets and listed buildings as the benefits will need to be weighed against the potential harms to the fabric of the structure. In some cases retrofitting will need to be carried out in a bespoke manner being mindful of the architectural and historic significance of the building or structure in question.

Policy Option Set R4: Efficient use of land.

We consider that there needs to be a stronger emphasis on the importance of delivering as much of Oxford's housing need within the City as possible as this is the most suitable approach and will help tackle housing affordability plus reduce commuting in the interests of climate change. Currently the supporting text is very brief on how important it is for as much of Oxford's housing need to be delivered within the city as possible, without compromising other environmental policies. We support option 'a' in principle which requires development proposals to make the best use of site capacity in a way that is compatible with both the site itself and the surrounding area.

Chapter 6: A city of culture that respects its heritage and fosters design of the highest quality

Given Oxford's important cultural function and its historic environment, it is crucial that the preferred approach protects and attempts to enrich the City. We note that many of the policies provide technical guidance on design and other standards such as parking and internal spaces rather than culture. We wonder if some of these technical standards would be better placed in other chapters such as 'accessible and adaptable homes' which may be better located in Chapter 2.

We feel that a stronger emphasis on design could be achieved in the Plan by seeking to provide design guidance for specific parts of the city.

As a general comment, we note that the maps on p146 and 147 are unclear as the text resolution on the keys is poor.

Below are some specific comments in relation to some of the proposed policies:

Policy Option Set DH3: View Cones and High Buildings

The preferred options appear to be sensible. As a general note, Figure 6-4 on p180 should be moved to align with this policy.

Policy Option Set DH6: Bicycle parking design standards

We generally agree with the preferred approach but there could be a stronger focus on wider cycle parking facilities. The policy appears to focus on residential and work locations rather than town centre locations and other destinations such as mobility hubs where safe and convenient cycle parking is important.

Policy Option Set DH7: Motor vehicle parking design standard.

We support Oxford's aspirations to make Oxford a car free City in principle. However, in order for this policy approach to be successful, there needs to be a highly effective and affordable public transport system in place at an early stage (not just within but also connecting the city with surrounding areas). Notwithstanding this, there needs to be some recognition that there may be operational reasons why some residents require private transport for work or personal reasons (for example a midwife who is on call) and whilst the preferred options allow some exceptions, this may need to be extended.

Policy Option Set DH9: Internal space standards for residential development.

We agree with the approach of applying Nationally Described Space Standards to ensure internal spaces are suitable for residents.

Policy Option Set DH10: Outdoor amenity space.

Given the space limitations in Oxford, we agree that there should be minimum outdoor space standards for residential. We consider that public open space to serve commercial space is adequate and appropriate to make the most efficient use of land.

Policy Option DH12: Healthy Design/Health Impact Assessments (HIAs).

The preferred option takes the approach of basing the need for a HIA on the scale of development, however option b) is based on the area's characteristics. This may have the benefit of capturing an area

with social/ economic challenges and given that many sites in Oxford are smaller in scale, perhaps this approach would be more beneficial.

Chapter 7: A more equal and inclusive city with strong communities and opportunities

Given the inequalities that currently exist within Oxford, this chapter should set out ways in which these inequalities can be reduced through cultural changes, accessibility and providing a high quality environment. These are cross cutting and we recognise that some of these have been reflected in other chapters of the Plan.

We support the 15-minute city concept but there should be a stronger link to this and the broader concepts of Healthy Place Shaping which considers other aspects of creating places including fostering health and wellbeing to reduce inequalities.

Below are some specific comments in relation to some of the proposed policies:

Policy Option Set C1: Focusing town centre uses in our district centres.

We generally agree with this approach but the policy options could be simplified. The policy should seek to avoid the concentration of single uses or uses which will likely cause amenity issues.

Policy Option Set C2: Active frontage.

Again we generally agree with this approach to protect these frontages but changes to the Use Class Order may limit its effectiveness so other measures which can be put into place to achieve the aims of the policy may need to be considered.

Policy Options C3 to C9 (Protection and provision of new community facilities).

We are broadly supportive of the preferred approaches taken in these policies but question whether these can be simplified and merged into fewer policies.

Policy Option Set C10: Transport assessments, travel plans and servicing and delivery plans.

We agree with the approach that transport assessments and travel plans should be required to review transport impacts. Perhaps given the car free aspirations of the City Council, more emphasis on how these can aid this transition could be included in the text.

As a general comment, which is relevant to the Plan as a whole, we feel that the Plan should have a much stronger focus on connectivity more generally. This should include policies related to active travel, public transport, mobility hubs, green infrastructure and digital connectivity which not just limits the need to travel but has the ability to improve the travel experience through live information and the ability to purchase on-line tickets etc.

Chapter 8 – Development Sites, Areas of Focus and Infrastructure

Oxford City Council has divided the city into four sectors with commentary on the future likely development in each sector together with the infrastructure requirements needed to mitigate the proposed new developments.

We are generally supportive of this approach and it is suggested that the mitigation measures within each sector should be aligned and comply with the proposed strategic policies, together with any future relevant National, Strategic or Regional planning guidance, which might come forward during the review and preparation of the Plan.

We recognise that this approach allows the cumulative impacts of development in the wider part of the city to be assessed, however these also need to be considered within the context of the city as a whole.

This chapter includes a section entitled 'Unmet need sites beyond city boundaries' which sets out that each of the neighbouring authorities, including West Oxfordshire, will be responsible for the delivery of the unmet need sites, however that the City Council will retain an interest in seeing these sites developed in a sustainable manner.

In respect of infrastructure, it states that these sites should be well connected into the existing network and reflect Oxford's particular approach to transport provision. Given that this is the case, the relevant policies within the Plan should consider required mitigation measures of any impacts which might occur on areas adjacent to the city boundary in neighbouring local authorities. Where this circumstance might occur then consultation at the earliest opportunity should perhaps be considered. Any requirement for mitigation measures and/or infrastructure for the neighbouring authority should be made available through the most suitable approach e.g. Section 106 planning agreement.

Policy Option Set DSI: Digital Infrastructure.

We question whether the preferred approach, which relies on national policy, goes far enough given the importance of digital connectivity in the post-Covid world and in terms of the opportunities it provides in improving connectivity which is a key issue facing the city. Many development sites within the city are smaller in scale so may not be covered by national policy.

Summary

In summary, the District Council is generally supportive of the progress being made with the new Oxford Local Plan, which is considered to be well written and presented in the main. We support many of the concepts and objectives in the Plan including the 15-minute city but other areas of the Plan lack detail. This includes the importance of the relationship between Oxford and the rest of the County in terms of connectivity and the economy. It also lacks some detail and emphasis on the importance of high quality design.

Fundamentally, at this stage we do however have some key reservations that the proposed approach in relation to housing provision including the proposed capacity-led housing requirement is premature and has not yet been agreed with neighbouring authorities.

This will need to be addressed through partnership working between the Councils going forward to identify the most appropriate level of housing need including any uplift from the standard method and the extent and apportionment of any need, which is unable to be met within the City's administrative boundaries.

If you have any questions or require clarification in respect of any of the comments outlined above, please let me know.

Yours faithfully,

Chris Hargraves