

Policy & Programmes

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Dear Oxford City Council,

Thank you for the opportunity to comment on your Preferred Options Local Plan 2040.

We are happy to provide a response and to emphasise the need to work collectively across Oxfordshire. The Oxfordshire Strategic Vision, adopted by all Oxfordshire Councils, articulates countywide shared aims for sustainable growth. We can together effectively deliver the Oxfordshire Strategic Vision and we must make progress along the route map to a net zero carbon Oxfordshire being developed collectively through the Future Oxfordshire Partnership.

There are critical sustainability challenges facing Oxfordshire that must be addressed, examples of these include:

- water supply
- renewable energy supply
- reducing carbon emissions from existing homes through retrofitting
- funding infrastructure required to support planned development
- decarbonising transport and reducing the need to travel
- identifying appropriate and sustainable levels of growth, and housing.

Generally, we have some concerns about the way some things are expressed in the consultation document, and we have set out our responses to the key matters of concern by topic.

Vision

The Oxford City vision generally reflects the Oxfordshire Strategic Vision although we note one exception. The draft Vision doesn't mention an extremely important part of the Oxfordshire Strategic Vision - affordable housing. As such, the draft Vision doesn't set the intention to respond to the challenge that the City has in relation to affordable housing.

Climate Change

Generally, we support the aims for net zero carbon.

The document outlines a plan to use Energy Use Intensity as the primary calculation to measure a building's energy usage. More detail would be helpful to understand how this will be set out in policy and what evidence, including viability, underpins it.

Potentially, a significant increase of future carbon emissions is likely should there be an inflation of development needs. This may make all our efforts to achieve our carbon reduction targets and realise the Oxfordshire Strategic Vision difficult. If you intend to aim for a net zero-carbon city, you must factor in transport emissions from the workforce commuting in from homes outside the city, which Oxford fails to supply homes for. Some collaboration to understand the carbon impacts of the decisions made in our local plans will be beneficial.

There needs to be more homes in Oxford (rather than jobs) so that you can deliver the Oxfordshire County Council Local Transport and Connectivity Plan vision to reduce 1 in 4 car trips by 2030 and deliver a net zero transport and travel system by 2040. The Oxfordshire Transport and Connectivity Plan rightly puts 'reducing the need to travel' as its top priority in order to achieve this aim. Your current proposals would do the opposite.

Getting the right balance of homes and jobs is important. We commented in August 2022 on the West End and Osney Mead SPD which is well located to be within a 15-minute neighbourhood, with good access to the station and city centre. The sites' emphasis on a proposed innovation district, and the proposal for mixed uses other than housing, undermines the opportunity this area holds to deliver much needed housing within the city. The true potential for housing of this area is far higher and your local plan provides an opportunity to review the sites and focus on housing delivery.

Strategic Spatial Strategy

Paragraph 1.37 talks about an aim for transport hubs (the district and city centres as set out in Paragraph 1.36): *"Prioritising housing outside of these areas will help get further to meeting the significant need for housing."* This has the effect of actively prioritising housing away from sustainable locations. If this is being developed into one of the broad principles for locating development, we would not support this because it is not in accordance with national guidance. Furthermore, the preferred approach of Policy Set R4 identifies the district and city centres (i.e. the transport hubs) as areas where minimum density policies would apply to residential units. Prioritising housing away from these areas would reduce the effectiveness of such a policy. Given the City's capacity constraints there needs to be more flexibility in such policies. Ideally minimum density should be presented, which should aim to be ambitious and transformational in order to respond to the Oxfordshire Strategic Vision.

The preferred option for Policy S2 states *"Assess all greenfield sites and set out reasons for their protection."* This approach to greenfield sites shows a pre-

judgement that all greenfield sites will be protected and that there needs to be reasons developed for their protection, which is not supported. It isn't clear how "*This approach shows that we are attempting to meet our needs by identifying all possible development sites*", it appears to demonstrate the opposite.

There are many early conclusions reached about neighbouring districts. Particularly, the Policy S2 review of the impacts of option b, which says "*If needs are not met in Oxford then they will need to be met in surrounding authority areas, where there is also limited brownfield land and where that is likely to result in greenfield site allocations.*" This is premature and it is beyond the scope of Oxford's Local Plan to make such points. As we have not yet discussed further unmet need or published a HELAA for our district, such conclusions cannot be drawn. There are assumptions made in the consultation document before calculating how much of the City's needs will be met from the sites already allocated in Vale of White Horse and other districts to assist with Oxford's unmet needs within the period to 2040.

Housing

At paragraph 2.5 on discussing housing states: "*We consider that circumstances are likely to exist in Oxfordshire that justify using an alternative method to calculate housing need, owing to its important role in the local and national economy.*" Oxford City Council cannot solely make determinations about the housing need required to serve all communities through Oxfordshire.

We strongly oppose the assertion at Policy H2 that exceptional circumstances exist "in Oxford and Oxfordshire" that justify alternative methods of calculating need. It is beyond the remit of this plan to draw conclusions for the whole county of Oxfordshire. In any event, the NPPF at paragraph 61 says that the standard method is to be applied to calculate local housing need "*unless exceptional circumstances justify an alternative approach*". The Planning Practice Guidance also states, "*there is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances*", citing some examples of circumstances that may qualify as exceptional¹. The City Council must demonstrate that such exceptional circumstances exist and should restrict their exploration of this issue to Oxford City.

Paragraph 61 of the NPPF also says that an alternative to the standard method must "*also reflect...current demographic trends and market signals*". The City Council must explain the impact that any factors not captured by the standard method (such as the impact of future government policies, changing economic circumstances etc) "*might have on demographic behaviour*" to establish whether "*actual housing need is higher than the standard method indicates*".

The consultation document includes a brief paragraph reiterating the rationale for the adopted 2036 Plan (meeting the significant affordable housing need, the Growth Deal existing to 2031, the LIS, delivery of a level of housing to support economic growth). These factors, and the planning context, have changed significantly since the City Council adopted its Local Plan 2036, and there is no evidence to support the

¹ Paragraph: 010 Reference ID: 2a-010-20201216

contention that these factors would continue to justify a departure from the standard method for the new Local Plan.

We do not consider those considerations would justify a departure from the standard method beyond the end of the Growth Deal in 2031. In particular, it needs to be acknowledged that:

- The Government has not released the last c.£30m of Growth Deal funding. This risks planned infrastructure projects.
- The current and planned strategic infrastructure improvements are not considered to be need-inducing, but to meet current needs.
- No recent housing needs assessment has been undertaken. The 2014 SHMA is not recent and the Oxfordshire Growth Needs Assessment was only a draft and did not include a district by district breakdown.

Paragraph 2.6 of the consultation document says: “*we will commission a piece of work to establish housing need, with a methodology agreed with as many of our neighbouring districts as possible*”. It is disappointing that this now appears to be commissioned before a discussion about collaboration with Vale of White Horse District Council was had, which is not positive preparation. We remain open to engaging with the City Council on the methodology.

Policy H2 covers the housing need for the plan period, and we note that the option of using the standard method (option a) is downplayed, with these words used under negative/ neutral consequences for the standard method: “*the NPPF does also allow for other calculations of need, where justifying circumstances exist*”. In fact the NPPF requires that any uplifts of housing need must be in 'exceptional' circumstances, but this isn't referenced. Given the impact of any uplift, the exceptional nature of this decision should be recognised.

The consultation document identifies another negative/neutral consequence of option H2a as “*The standard need calculation does not take account of the strong economic growth in Oxfordshire*”. We do not believe that the City Council's disagreement with the way Government sets out the standard method calculation is a valid exceptional circumstance.

Statements like in paragraph 2.12 “Oxford can *never* meet its *full* housing need” are ambiguous, premature and unambitious. They are unhelpful predeterminations prior to collection of necessary evidence.

Policy H1 sets out the City's preferred approach for the housing requirement as being a capacity-based or constraints-based housing requirement. We fundamentally disagree with this approach. The Policy H1 alternative option b of aiming to meet the City's housing need should be the preferred option, to ensure compliance with the NPPF. Instead, the consultation document emphasises potential negative consequences of meeting the City's need in full before it has been evidenced.

A higher housing requirement, if that is what City want to achieve, should involve the City maximising the number of homes on allocated sites within Oxford to provide housing in sustainable locations, as well as taking a more permissive approach to

windfall sites. To do this, the City should be taking a more positive approach to higher densities and higher buildings in Oxford, in order to use land as efficiently as possible, recognising this will help achieve the 15-minute city living ambition set out in the consultation plan.

The City Council's discounted option H1b (housing requirement based on the housing need) references failure to meet the Housing Delivery Test as a local plan soundness issue. This is not correct. The Housing Delivery Test assesses an authority's past record of housing delivery and is not used to inform the soundness of a new plan.

The consultation document asserts that the housing capacity of Oxford is lower than the standard method housing need. The capacity is expressed as circa 9,147 dwellings to 2040, or 457 per year. Compared with the current Local Plan's requirement of 10,884 homes between 2016 and 2036, or 544 homes per annum, this figure is a disappointingly low capacity for the City to 2040. Under the emerging plan, 457 per year would replace the City's current annual housing requirement of 567 dwellings to 2036², which is a reduction of 24%.

We question whether efforts have been made to identify any significant new sites or new capacity. The preferred options document is opaque about which sites are already allocated and which are new. Little capacity seems to have been found since the last adopted local plan, despite post pandemic changes to how we work, shop and study being likely to trigger land use changes. There will presumably be lower requirements for car parking in Oxford during the plan period resulting from the County's Central Oxfordshire Travel Plan, releasing urban car parks as highly sustainable brownfield sites.

Instead, the local plan consultation suggests a *reduction* in capacity and appears to consult again on the principle of developing the *existing* allocations. To provide such a lack of supply in such a sustainable location as Oxford is concerning and we are keen to engage to review where interventions, potentially in the approach to the City's HELAA, may increase this supply position.

Some policy preferences expressed in this consultation document may also be compounding this poor supply.

Policy H5 introduces employer-linked affordable housing. It may be beneficial for the county if there were sustainable opportunities to widen the scope of the policy to other employers beyond the Universities and Hospitals Trust. Locating homes for staff on campuses or operational sites will also provide an additional source of housing supply which should be factored into the City's capacity assessment.

Alternative option 'c' for Policy H14, on elderly person's accommodation and other specialist housing needs, implies the City Council imposing planning policy on large strategic sites just outside the city. This is outside the scope of the City's local plan, please remove.

² Policy H1 of the adopted plan identified a stepped trajectory of 475 dwellings per annum between 2016/17 and 2020/21, raising to 567 dwellings per annum between 2021/22 and 2035/36.

The Housing Need Background Paper³ reports that the current affordable housing policy 'generally works well', with delivery of 144 affordable homes per year. We question if that is a fair reflection of the success of the City's affordable housing delivery.

Employment

We note that Policy E1 (Employment Strategy) is a continuation of the approach in the adopted plan: to make the best use of the city and district centres and existing prime employment sites, primarily through the delivery of continued employment uses at these locations.

For Policy E2 (Making best use of existing employment sites), the preferred option 'a' continues the adopted local plan policy of identifying different categories of employment site, with varying degrees of protection applied. For 'Category 1 and 2 sites' the approach is to seek to meet employment needs by intensification, modernisation and regeneration of employment uses. Although Category 3 sites can be redeveloped involving a 'complete loss to housing', we note in the Employment Background Paper⁴ that this approach has only delivered five homes to date. There is clearly an issue with the flexibility of the adopted policy to release Category 3 employment sites that have become redundant. Although hailed as a flexible policy, the yield of homes to date has been meagre and maintaining this approach may not be flexible enough to respond to changes in market conditions.

An Employment Land Needs Assessment accompanies the consultation, but there are employment sectors referred to in the local plan consultation document that do not feature in this evidence study, such as job creation for green technology manufacturing, a focus on local businesses / food produce, and a conclusion that Oxford is the most sustainable location for employment in the county. There needs to be evidence presented for this, particularly the claim that Oxford is the location that all employment sectors consider to be most sustainable location.

There is a conflict in the emerging direction of policy, in claims that Oxford is the location that all employment sectors consider to be most sustainable, but then not recognising this applies to homes. This doesn't align with 15-minute neighbourhood thinking. Policies that will result in thousands more workers living in towns outside Oxford while working in jobs based in Oxford is not, by definition, compatible with the 15-minute neighbourhood approach. We ask that the assertions about sustainability are backed up with data, for example on in-and out-commuting from Oxford.

The preferred approach in Policy E4 (Location of new employment uses) is supporting new employment uses on existing employment sites and at employment locations. We consider that this needs evidence in order for the policy to be effective. All capacity for employment space needs to be specifically identified. The impact of the changes to the Use Classes Order (new Class E), which provides flexibility for land use changes without the need for planning permission, is a weakness that has

³ https://www.oxford.gov.uk/downloads/file/8139/bgp_1_housing_need_and_requirement

⁴ https://www.oxford.gov.uk/downloads/file/8138/bgp_5_employment_and_economy

not been sufficiently recognised. Some existing employment sites might be better converted to new uses to meet Oxford's other needs, including housing.

Unmet need sites / Areas of Focus

The Plan needs to clarify what the purpose and policy intention is for the Areas of Focus. It says at paragraph 8.7 that these large areas will become site allocation policies. It also says the City wants to extend them beyond the boundary of the city. The City cannot allocate sites outside its boundary, this is beyond the scope of the plan, please remove.

In the last round of local plans in Oxfordshire, there were sites allocated to help meet Oxford City's unmet need within our district. Some of these will continue to deliver housing during our next plan periods. These sites are allocated in our Vale Local Plan 2031 Part 2 and were secured through cooperation between us.

The City Council has not made a new formal direct approach to us to take further unmet need, but instead has chosen to refer to this as 'ideal' in this consultation document (paragraph 2.6). There has been no attempt to properly justify exceptional circumstances for higher growth than the standard method, or to meet the City's needs in full within Oxford. Given our concerns about the weaknesses of the capacity assessment and the lack of discussion with us, it is inappropriate to see the consultation document describe as 'ideal' a proposal that further impact on neighbouring districts is warranted.

There are a number of references to existing allocated sites for Oxford's unmet needs and a desire to add to or adjust their requirements. As these have already been adopted and they are not in Oxford, it is not appropriate for the City's new local plan to adjust such allocations. It would be beneficial for discussions on this matter, as well as the other issues raised in our response for the mutual benefit of all related plans.

Yours sincerely,



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