

Neighbourhood Plan Continuity Committee

Title:	Oxford City Local Plan 2040 Preferred Options
Date:	18 October 2022
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Background

1. Oxford City are undertaking a Regulation 18 Local Plan consultation branded preferred options. The response from this consultation and technical studies will feed into a Draft Plan consultation in Autumn 2023. The City aim to submit the Plan for examination the following year and adopt it in 2025.
2. The plan is seeking to address certain weaknesses:
 - the City's green areas have fragmented habitats with some areas deficient in open space
 - some areas having poor access to services and facilities
 - traffic congestion
 - the built stock is largely old or ageing
 - 29% of children live below the poverty line
 - there is 12.4 years difference in life expectancy for women between the least and most deprived wards
 - there is a lack of quality workspace in areas of high demand; some are poorly connected and inefficient in their land use
 - Oxford has a recognised disparity in education and skills
 - the lack of available housing stock affects businesses and institutions looking to recruit; there were also 2,852 households on the City's housing register January 2021
3. To help establish a Local Plan to address these issues, the City has proposed a Vision. The key principles from this vision are:
 - Oxford will be a healthy and inclusive city, with equal opportunities in terms of access to housing, nature, jobs, healthcare and social and leisure opportunities
 - it will be a net zero carbon city with greater resilience to climate change impacts.
4. The plan is based on offering two options against main topic and policy areas to help choose how Oxford will address its current and future needs. The NPCO has assessed options and is recommending Thame supports those that respect the overall Vision of the Oxford Plan while considering any outcomes that might negatively affect residents or businesses in Thame.
5. The Preferred Options plan is wide-ranging, but the report below focuses on matters that could lead to the displacement of population or businesses into surrounding Districts. It is felt this is appropriate, given Thame has both housing affordability issues and very low vacancy rates for employment land and floorspace.
6. It is therefore proposed that Thame supports the City's aims to:
 - commit to the 15-minute city concept to help keep Oxford attractive to residents and address inequalities
 - to look at improving and expanding on existing public transport links

- to keep development and uses that attract people close to transport hubs to reduce reliance on private vehicles / address inequality
- to protect services and community assets
- to provide affordable housing and workplaces.

Development principles

7. Support should be given to the City to follow these two options:
8. Option S2a – Approach to Greenfield Sites.
 - reviewing both brownfield and greenfield sites for their existing suitability of function
 - reviewing all Green Belt land to establish land that would not harm the integrity of the Green Belt nor harm sites of biodiversity importance, etc.
9. Option S4 – Viability considerations
 - support the principle of viability assessments that prioritise the delivery of affordable housing over car parking and new zero ambitions.

Housing requirement for the Plan Period

10. Oxford does have a high housing need, especially given its affordable housing concerns. The housing need that is not able to be accommodated in the City will have to go elsewhere. The level need is set at is, therefore, a major factor in terms of its impact on surrounding authorities and that impact may be felt as far as Thame.
11. Option H1a is recommended for support. This would require each site to be assessed in terms of its capacity to deliver homes which would give confidence that a thorough search had been undertaken. It would also give confidence to Oxford City Cllrs and residents that sites were not being inappropriately crammed and selected areas not being treated unfairly.
12. Furthermore, matching the housing requirement to the housing need figure would, no matter how calculated, present an annual requirement that is so high that it would likely lead to pushback from the City's residents and businesses. It is feasible that such a Plan would in any case be judged unsound at Examination through not being deliverable; while any delay in the City producing a sound plan could negatively impact on the surrounding Districts.

Housing need for the Plan Period

13. Whatever the level of need chosen by Oxford the surrounding authorities will need to be involved. The 2 options offered require either the Standard Methodology be used – around 729 homes per annum – or a number linked to economic growth. The City currently builds around 400 dwellings per annum inside its boundary. It states that background economic growth requires a higher housing figure, anyway; but that building to a higher Growth target would mean extra funding for the City and Districts through the Growth Deal or Housing Infrastructure Fund. It would also allow for extra affordable housing to be provided.
14. The former risks homes being provided in Oxford and around it with insufficient infrastructure to cater for them. The latter brings funding to perhaps mitigate against the provision but may provide a much higher number of housing per annum that would have to be met within the Districts.
15. These are the two realistic options for housing need. On that basis, Option b), a Growth needs figure is recommended. What will be critical going forward, though, is how that need

figure will be calculated and where the upper limit will land. This is partly reliant on the how the City distributes and protects its employment land.

Employment Strategy

16. The City argues that Oxford is the most sustainable location for employment in Oxfordshire and that it will be easier to provide sustainable transport to workplaces here than elsewhere. Demand is led by R&D and lab spaces, meaning traditional offices vacated by downsizing service industries are being converted to R&D and labs.
- Option E1a is recommended. This aims to meet employment needs in Oxford but not at the expense of housing and other essential uses. This could help reduce in-commuting and prevent the sprawl of housing and widen access to homes for those with / seeking jobs in the City area. This policy would allow for some employment sites to become mixed use, with some housing on site.
 - Some employment would need to be delivered outside Oxford. Joint working will be required to ensure delivery here is mutually agreed. This is felt to be better than the alternative option b), though, which would allow for employment growth at the expense of housing; or option c), which would seek protection of diverse uses such as light and heavy industry and warehousing. The City feel these uses, while providing a spread of job opportunities will by their nature not be able to pay the local high land and rental values. While not stated, they may also end up being serviced by people in-commuting into the City area from cheaper housing market areas. issues.

Making the best use of existing employment sites

17. The City is claiming that land values for research and development uses are now even higher than residential uses. The preferred economic strategy will be to build on Oxford's strengths in life sciences and other R&D while ensuring diversity in the local economy is not lost.
18. The introduction of Class E means that office uses, research and development and light industry are now interchangeable. Uses can convert to residential through the prior approval process. Local protection can now only be applied to Class B2 (and B8).
- Supporting Option E2a is recommended. This protects the best employment land in either E or B2 uses and encourages intensification and regeneration on them. Poorly performing employment sites will be permitted to be developed for alternative uses including housing, in part or whole. This approach could prevent these from turning to alternative Class E uses that could harm attempts to focus services around hub locations.
 - An alternative option of not permitting any change on any grade of employment land could lead to housing and employment being pushed to less sustainable locations, and is not supported.
 - A third alternative of not categorizing employment sites but just protecting B2 uses would remove the ability to encourage some poorly performing / poorly located sites to alternative uses such as housing.
 - A fourth approach of allowing full flexibility across all sites would lead to a rush to the most valued uses, potentially harming the aim to retain some diversity in the local economy.

Allowing housing on existing employment sites

19. Given the recommended support for Option E2a, it is recommended that E3a is supported, which would allow for housing on existing employment sites. This may in time assist in the

regeneration of some of the worst performing sites, bringing them into mixed use with potentially higher densities of employment provision.

- The alternative option would look to protect all parts of sites for employment, PD uses aside, but this option would prevent potentially positive changes and may reduce opportunities for estate-wide regeneration. With R&D currently outstripping all other land uses in terms of value in Oxford, this option may prevent Oxford from seeking much needed alternative uses.

Warehousing and storage uses

20. The City are looking to discourage B8 within Oxford. Change away from B8 is encouraged, except where it can be shown to be essential to the workings of the best performing employment sites. This is because B8 operations tend to use land intensively and the City believes there are better uses for that land. There is a plan led by the Zero Carbon Partnership to introduce a pilot scheme for a freight consolidation hub on the edge of Oxford. This will act as a hub and it is planned that electric vehicles and cargo bikes only will be permitted to enter the City from this site.

- It is recommended that Thame supports the use of non-essential B8 land within Oxford for alternative uses. This may include employment or housing uses which will reduce the need to provide these outside of the City's borders. Reducing B8 and the numbers of larger service vehicles operating within Oxford may help encourage active travel and public transport use and help keep it as an attractive place to live.
- There is a risk that warehousing uses will be displaced to alternative locations, including Thame. The distance from Thame to Oxford would help reduce this, and the risk is also offset by the City's policy approach to provide a freight consolidation hub on the edge of Oxford itself.

Affordable workspaces

21. Oxford are looking to require a certain proportion of workspace to be made affordable as part of large Class E schemes. This will help avoid essential service industries from having to relocate to less sustainable locations. It is recommended that we support this policy approach.

Recommendation

22. It is recommended that Thame Town Council agrees to send the above commentary to Oxford City's 2040 Local Plan Preferred Options Consultation.