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Representations_Colleges Group_Final



Planning Policy Team
Oxford City Council
Via email

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Dear Sir/Madam,

**Oxford Local Plan 2040: Submission Draft (Consultation November-January 2022)
Response on behalf of Oxford University & Colleges Group**

Savills is instructed as advisor to the Oxford University and Colleges Group, which comprises the University of Oxford as well as Brasenose, Christ Church, Exeter, Lincoln, Magdalen, Merton, New, Nuffield and St John's Colleges (the University & Colleges). As you will be aware, the Group has engaged with the Oxfordshire Local Authorities on a range of issues relating to the housing and employment needs of Oxford and how these can be met in the most sustainable way both within the City and the adjoining authorities.

The University & Colleges are grateful for the opportunity to comment on the Submission Draft (Regulation 19) of the Local Plan for the period to 2040 (LP40). Whilst these representations are submitted on behalf of the University & Colleges collectively, separate representations may be made by group members on more detailed and site-specific matters. Previously this Group has submitted the following observations in relation to the emerging LP40:

- policies should identify and respond to the strategic allocations outside of Oxford's administrative boundaries albeit close to the urban area, particularly those that address the unmet needs of the City.
- the high housing needs of the City demand flexibility in relation to new development and particularly the proposed density and height standards, which should be ambitious and not overly prescriptive.
- the need for student accommodation to support the University & Colleges is high and sites along arterial routes and adjacent land should be considered sustainable locations.
- the failure of the Oxfordshire authorities to progress the 2050 Plan is a significant missed opportunity, not least in relation to establishing a set of shared objectives for the county, including the definition of county-wide targets for homes and jobs growth, a spatial framework to meet these needs in the most sustainable way and setting sustainability standards that all new development should achieve.
- the emphasis on providing housing is at risk of being to the detriment of the needs of the economy, which is a matter of considerable concern given that Oxford is a globally recognised centre for innovation in a number of sectors including life sciences, energy, technology/computing and digital health.

In relation to the final bullet point, the strength of the City's economy is underpinned by both direct and indirect economic contributions that the University & Colleges generate. The University is responsible for over 17,000 jobs locally, comparable to roughly 10% of the City's population, and injects £750 million annually into the local economy. The buildings that the University operates and maintains also contribute to Oxford's attraction as a tourist destination, with tourists spending £611m annually in the local economy. In addition, the University & Colleges produce the highest intensity of university-created spin-out companies in the country, as the Local Industrial Strategy identifies:

'the University of Oxford continues to generate more spin-outs than any other University in the UK – there are currently over 150 active start-ups and spinouts focused in a number of pioneering technologies and sectors,

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with the ambition to harness the wider innovation ecosystem to deepen commercialisation of R&D and significantly accelerate the production of new businesses in coming years.’¹

Whilst the whole of Oxfordshire, and the wider UK, benefits from this economic activity, many spin-outs rely upon proximity to Oxford given the important relationship with research activity undertaken in the University. It is in this context that it is key that there is sufficient land in the City to accommodate the dynamic and expanding range of economic activity that wishes to locate in and close to Oxford.

Vision and Spatial Strategy and Presumption in Favour of Sustainable Development (Policy S1)

Having summarised the key concerns set out by the Group in previous representations, these representations raise an objection to Policy S1 on the basis that it does not reference the importance of the local authorities that adjoin Oxford in terms of the contribution that they will make to the future success of the city. Of fundamental importance is the fact that a significant part of the Oxford’s future employment and housing needs will be met in the adjoining authorities. For example, in relation to housing, the City’s housing target of 481 dwellings per year represents less than a third of the need identified in the HENA i.e. 1322 dwellings per year.

The extent to which the housing requirement will be met within sites allocated in the adjoining authorities is identified in Figure 8.2 of the LP40, titled ‘*Allocated unmet need sites outside of Oxford boundary*’. The explanatory text in paragraphs 8.6-8.8 describes this relationship insofar as it exists in the adopted local plans of the collective Oxfordshire authorities i.e. up to 2036. However, there is no explanation provided in the LP40 as to how the housing needs arising in the period beyond this date are to be addressed. To the extent that this is referenced, the final sentence of paragraph 8.7 states:

‘In several instances the sites identified in Figure 8.2 above are already indicating a greater capacity than previously estimated, so it may be that the additional unmet need to 2040 can be met this way.’

This statement is inadequate. In the context of the pressing need for homes in the City a more rigorous analysis of the remaining capacity of the sites identified in Figure 8.2 is required to determine their long-term potential. Such an analysis will identify whether there is a requirement for further land release beyond the existing allocations. In addition, this is not simply a matter of physical capacity i.e. the size of the site, but also one of environmental capacity and the available capacity of supporting infrastructure to accommodate an increase in the scale of development that might be delivered from the allocated sites.

Furthermore, the unmet development needs of the City are not limited solely to housing. As referred to above, the City is an economic dynamo that is of regional and indeed national importance. It is vital that sufficient land supply is created to allow for this ongoing expansion of the local economy in all of its forms; offices, laboratory spaces, industrial, logistics and manufacturing. The importance of the authorities adjoining the City in meeting the unmet employment needs is already apparent in the series of adopted Local Plans; the expansion of Begbroke Science Park in the Cherwell Local Plan, the expansion of Oxford Science Park in the South Oxfordshire Local Plan and a new science park to the north of Eynsham in the West Oxfordshire Local Plan.

In light of these factors, the University & Colleges Group request that the wording of Policy S1 is amended to make specific reference to the importance of land in the adjoining authorities to the delivery of the spatial strategy of the City over the period up to 2040 and beyond. Of particular importance are the following factors:

- that the urban area of Oxford will, during the period of LP40, substantially expand onto land outside of the City’s administrative boundary;
- that the allocations shown in Figure 8.2 adjoining Oxford will be key to meeting housing needs, jobs growth and other land uses to support a successful city both in the period to 2040 and beyond; and
- that the objectives expressed in the Spatial Strategy for Oxford should be extended across the whole urban area of the city, including those in adjoining authorities, to ensure a consistent approach to achieving improved prosperity, health, wellbeing, and environmental quality.

¹ ‘*The Investment Plan; Oxfordshire’s Local Industrial Strategy*’, HM Government and OxLEP, August 2020.

It has not previously been necessary for Oxford's Local Plan to address these themes. However, the last cycle of Local Plan reviews in Oxfordshire has fundamentally changed the spatial strategy for the County; moving away from the former 'County Towns' strategy to a new strategy that allows for the physical expansion of Oxford by means of a review of the Green Belt. The degree of coordination that is required among the authorities that adjoin Oxford is therefore much greater if all residents of the urban area of the City are to be beneficiaries of the Vision and Spatial Strategy.

This objective may well have been achieved if the Oxfordshire 2050 Plan would have proceeded to adoption; the University & Colleges Group strongly supported the 2050 Plan and invested both time and resources into its early drafting. Given the joint decision of the Oxfordshire authorities to abandon the 2050 Plan, there needs to be some other mechanism to embed a unified policy approach for the expansion of Oxford into the relevant policy documents. The Group requests that this be set out in Policy S1 with the intention that the relevant extracts are then incorporated into the local plans of the adjoining authorities.

Objection: the University & Colleges believe that the current plan in relation to the Vision and Policy S1 is unsound on 2 key points:

- i. it does not adequately acknowledge the contribution that the Universities & Colleges make to local social value, educational services and tourism as well as their economic development role both locally and to the wider economy. This point should be recognised in the Vision as it is later in LP40 at paragraph 3.4; and
- ii. it fails to acknowledge the role of adjoining authorities in meeting the needs of Oxford, for example in relation to housing needs as set out in paragraph 15 of the NPPF (2023), as well as their role in ensuring the objectives of the Spatial Strategy are achieved consistently across the full extent of the City.

In order to address these Soundness issues the following change is requested in relation to the Vision:

- in paragraph 1.2, include reference in the highlighted text to the University of Oxford and the Colleges as follows: "...to innovate, learn and enable businesses, **the University of Oxford and Colleges to prosper....**"

Furthermore, without a clear Spatial Strategy the LP40 is unsound as it is not positively prepared, effective or justified. The following changes are therefore requested in relation to Policy S1:

- the policy be split into two separate policies, one dealing with Spatial Strategy and a separate one dealing with the presumption in favour of sustainable development.
- Policy S1 should set out a Spatial Strategy for meeting the vision and objectives of the Plan, including reference to the role that the authorities that adjoin Oxford play in ensuring the Vision is achieved in a comprehensive, consistent and joined-up manner as follows: "***The City Council, through its policies and decisions and working collaboratively with neighbouring authorities, will aim to positively pursue sustainable development ...***".

Further to this objection to Policy SP1, the Group would like to offer the following commentary on the remainder of the draft LP40.

Housing Requirement (Policy H1)

In reference to the points raised above in relation to Policy S1, Policy H1 is inadequate in that it does not set out a clear mechanism for how the homes that are so desperately needed in the City are to be provided. In part the response should be for Policy H1 to be more ambitious in the densities and building heights that have been set out. These should not be prescriptive, but instead be seen as guidelines that are able to be exceeded where more detailed design analysis demonstrates that they are acceptable.

The remaining part of the housing requirement identified will need to be met on land outside of Oxford, in the adjoining authorities. In relation to this component, the Group has requested a more thorough examination of

the capacity of existing allocations in adjoining authorities (as well as in the City) to accommodate this overspill growth. If adequate capacity cannot be identified then a wider spatial strategy will need to be put in place to meet the remaining unmet need, including a further Green Belt review as one of the spatial options.

Affordable Housing Contributions from new Purpose-Built Student Accommodation (Policy H3)

The University and Colleges welcome the fact that financial contributions to affordable housing provision is not required where:

- PBSA is to be delivered within an existing or proposed university or college campus site; and / or
- involves the proposed redevelopment of a PBSA site that is University / College-owned.

The policy refers to a definition of 'existing or proposed university or college campus site' to be provided in the chapter glossary. However, it appears that a definition has not been included in the draft document. Such a definition should be flexible and wide ranging, so as not to restrict development on collegiate sites.

Finally in relation to PBSA, the Group welcomes that contributions will only be required in relation to the net increase in units not the whole.

Location of New Student Accommodation (Policy H9)

The Group objects to the narrow definition of locations where student accommodation can be located. The Group has previously argued that arterial roads and adjacent sites should also be included as sustainable locations for student accommodation as has been determined in relation to Hostels in Policy H15.

Linking New Academic Facilities with the Adequate Provision of Student Accommodation (Policy H10)

The Group recognises the need for new academic development to be supported by a commensurate level of student accommodation. The proposed threshold of 1,300 additional full-time taught course students living in Oxford requiring accommodation and which exceeds the level of university owned or managed accommodation, represents a further lowering of the previously stated thresholds i.e. 2,500, then 1,500. This consistent downward trend in the threshold could have adverse implications for the operation of the University & Colleges, particularly in a City where the availability of land for this form of development is limited, including by the definition contained in Policy H9 (referred to above).

Net Zero Buildings in Operation (Policy R1)

The Group supports the ambition for Net Zero Buildings in Operation in LP40. However, the requirement for a building's energy needs to be met by on-site renewable energy is not workable and is at odds with the Written Ministerial Statement of 13th December 2023². This approach also works against the efficient use of urban land, which is a key aspect of the NPPF and policies elsewhere in LP40. Whilst the policy also allows for off-site regeneration where total energy need cannot be met onsite, the generation of energy off-site and the ability to feed this back into the grid is reliant upon adequate capacity in local infrastructure. Overall, the local grid in Oxford is highly constrained and may not therefore enable the kind of off-site solutions the policy refers to.

A more flexible policy approach is therefore required, based on a Local Area Energy Plan (LAEP) which is better suited to set out the change required to transition an area's energy system to Net Zero in a given timeframe. The LAEP approach is achieved by exploring potential pathways that consider a range of technologies and scenarios, and when combined with stakeholder engagement leads to the identification of the most cost-effective preferred pathway and a sequenced plan of proposed actions to achieving the goal of Net Zero. The LP40 has not undertaken the breadth of analysis that would underpin a LAEP and is therefore at risk of prescribing approaches that do not represent the most cost-effective pathway.

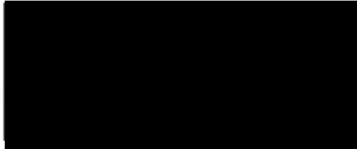
R1 suggested change

² 'Planning – Local Energy and Efficiency Standards Update', Statement made on 13 December 2023, Statement UIN HCWS123.



We trust that the above comments are useful and assist the preparation of the new Local Plan. However, if you have any comments in relation to the above, please do contact us.

Yours sincerely,



David Jackson MA MRTPI
Director

cc: University & College Group members