



Policy/Section	WODC response
<p>Policy S1 – Spatial Strategy and Presumption in Favour of Sustainable Development</p>	<p>In general terms, this policy is supported, however there are a number of issues which we feel may be helpful to raise.</p> <p>Firstly, although the policy makes some mention of housing provision, we feel it could more fully commit to maximising the delivery of new homes within Oxford’s administrative boundaries (in line with our comments on the draft vision above).</p> <p>We also note that the policy is not particularly spatial or specific about different parts of the city. From reading the policy and the supporting text, it is not clear how the City is expected to evolve in the period to 2040. A key diagram to illustrate the policy would be helpful here.</p> <p>Given that the protection of amenity is quite a general issue, it perhaps doesn’t need to be included within a spatial strategy policy.</p> <p>In relation to green and blue infrastructure, the policy should more clearly emphasise the importance of enhancing those networks rather than simply avoiding harm to them.</p> <p>As a general observation, the Government’s planning practice guidance on plan-making is clear that local plans do not need to mirror the NPPF’s presumption in favour of sustainable development and so the policy could perhaps be made shorter by removing this aspect.</p>
<p>Policy S2 – Design Code and Guidance</p>	<p>Whilst we have no concerns with the purpose and intention of this policy and the emphasis on achieving good design, we note that parts of the policy read more as statements of intent than policy per se and could therefore potentially be moved to the supporting text.</p> <p>An example of this being <i>‘The City Council will be proactive in producing additional local design codes or guidance when a need arises’</i>.</p> <p>Perhaps the policy could more usefully set out the key principles/aspects of the design checklist at Appendix 1.1 so that it is clear what aspects need to be reflected in any local design codes being prepared.</p>

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<p>Policy S3 – Infrastructure delivery in new development</p>	<p>The general intention of the policy, which is essentially to ensure that new development is supported by timely provision of supporting infrastructure, is supported.</p> <p>We would suggest however that the policy could potentially be strengthened. At present, it simply states that developers will be expected to demonstrate that they have considered existing capacity and are making suitable provision for infrastructure.</p> <p>Perhaps for major development, the policy could include a specific requirement for a site-specific infrastructure delivery plan to be prepared in the context of the City Council’s IDP but identifying the specific provision needed to support the proposed development.</p> <p>We would also observe that some of the policy reads as a general factual statement which would be more appropriately located in the supporting text. For example:</p> <p><i>‘Enhancements to public transport accessibility in the south east of the city are needed to support the anticipated intensification of existing employment uses and new residential development. Supporting existing public transport and the reopening of the CBL to passengers would enable a reduction in car use to this area’.</i></p>
<p>Policy S4 – Plan viability</p>	<p>Development viability is an important issue and we generally support the approach being taken in this policy.</p> <p>The policy could however more clearly reflect the PPG assumption that where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable.</p> <p>The supporting text could also perhaps reflect the type of circumstances which can lead to viability problems e.g. where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent).</p>

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2. A Healthy and Inclusive City to Live in	
Policy H1 – Housing Requirement	<p>The District Council has a number of significant concerns relating to Policy H1 and the supporting text as set out below.</p> <p>Paragraph 2.1 infers that it is only the limited supply of housing in the City which leads to high property prices whereas in reality this is due to a large number of factors, including Oxford’s attractiveness, central location, cultural offer, job opportunities etc. This should be more fully recognised in the text.</p> <p>Paragraph 2.5 states that the minimum housing need figure for Oxford can be calculated by using the Government’s Standard method as set out in National Planning Policy and guidance but then goes on to explain that this would not tackle the fundamental issue of Oxford’s urgent need for more homes and reflect the particular economic circumstances of Oxfordshire including the role of Oxford. It goes onto explain that adopting the standard method would be likely to result in more in-commuting and worse affordability of homes, in addition to constraining economic growth in Oxford and elsewhere.</p> <p>We consider the text should be amended to more closely reflect paragraph 61 of the NPPF requirement which states that strategic policies should be informed by a local housing need assessment, conducted using the standard method unless exceptional circumstances justify an alternative approach.</p> <p>The text should therefore explain:</p> <ul style="list-style-type: none"> • Why a countywide assessment of housing need has been undertaken rather than a local assessment of housing need for Oxford City only; • Why this has been undertaken without the involvement of West Oxfordshire District Council, South Oxfordshire District Council or the Vale of White Horse District Council; • Why the standard method figure for Oxford has been adjusted to take account of the 2021 census (when the planning practice guidance explicitly states that no such adjustment should be made); and • What the exceptional circumstances are that warrant departing from the standard method (noting that the standard method already incorporates an adjustment for housing affordability).

Paragraph 2.7 refers to the Housing and Employment Needs Assessment ('HENA') jointly commissioned with Cherwell District Council stating that it 'objectively assessed the housing need for Oxford'.

As the HENA also considered West Oxfordshire and the other Oxfordshire local authorities, its assumed status should be more clearly explained. Specifically, is the City Council saying that the HENA has objectively assessed the housing need for West Oxfordshire too? Clearly this has implications for the development of our own Local Plan and so should be more clearly explained.

Paragraph 2.8 states unequivocally that the housing need in Oxford is 1,322 new dwellings per annum.

However, this masks the fact that the HENA considered a number of different scenarios and that the 1,322 figure effectively represents a policy choice that takes into account projected employment growth and distribution which the City Council has effectively opted to support.

One of the reasons given for this approach is to reduce the effect of in-commuting, however, this is exactly what will occur should the outcome of the Oxford Local Plan process be that there is a significant quantum of unmet housing need that will need to be accommodated in the adjoining Districts.

We note that the supporting text makes no mention of any discussions held on this topic with the other Oxfordshire local authorities. Given its fundamental importance, not least in terms of the duty to co-operate, we would have expected to see at least some reference to any such dialogue.

Notwithstanding the 'in principle' concerns outlined above, in terms of Policy H1 itself, the policy should include reference not only to the anticipated level of supply but also the assumed level of housing need so that it clearly forms part of the policy.

The policy should essentially state that the assumed level of housing need in the period 2020 – 2040 is 1,322 dwellings per annum and that the capacity-based housing requirement figure is 481 per annum.

The policy should also set out how many homes have been completed since 1st April 2020 or are committed by way of planning permission or draft allocation.

We note that the second part of the policy reads like a statement of intent rather than a policy requirement and that it includes no reference to the phasing/timing of delivery so it is not clear how the

	<p>average of 481 units per year will be delivered. The policy should clearly link to a housing trajectory.</p> <p><u>Summary</u></p> <p>In summary, we have significant concerns over Policy H1 and the assumptions and evidence that underpin it.</p> <p>Whilst it is appreciated that each authority is at a different stage with their Local Plan reviews, given the importance of housing as a strategic matter of cross-boundary importance, there should clearly have been a much greater degree of collaboration and discussion taking place than has been the case to date.</p> <p>We therefore consider the approach which has been taken by the City Council to be unsound insofar as the draft plan is:</p> <ul style="list-style-type: none"> • Not positively prepared (in the absence of any agreement with other authorities regarding unmet need); • Not justified (on the basis of the housing needs evidence that underpins it); • Not effective (in the absence of effective joint-working on cross-boundary strategic matters); and is • Not consistent with national policy (given the census related adjustments which have been made to the City Council’s standard method figure in the supporting evidence).
<p>Policy H2 – Delivering Affordable Homes</p>	<p>The policy seeks to facilitate the delivery of new affordable homes which is consistent with national policy and supported – particularly given housing affordability pressures in Oxford and Oxfordshire more generally.</p> <p>We note with interest the exclusion of First Homes from the policy despite there being a national requirement for such provision.</p> <p>Clearly this will be a matter for the City Council to justify to the Inspector at examination and could usefully be more clearly explained within the supporting text.</p> <p>As a general observation, we note the policy uses the phrase ‘truly affordable’ and would simply point out</p>

	<p>that in the examination of the Salt Cross Area Action Plan (AAP) the Inspector struck out similar wording on the basis that it does not form part of the national policy definition of affordable housing.</p> <p>We also note that the policy allows for some intermediate housing (20%) provided it is affordable in the Oxford market – however it is not explained what is meant by this and it could usefully be illustrated with some examples in the supporting text.</p>
<p>3. A fair and prosperous City with a globally important role in learning, knowledge and innovation</p>	
<p>Policy E1 - Employment Strategy</p>	<p>As a general observation, we note that this policy is quite lengthy and may benefit from being condensed in some areas. Some of the criteria in relation to residential development are rather generic and may be better placed in another policy and cross referenced as appropriate.</p> <p>We support the approach taken 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.</p> <p>The policy refers to any proposals for residential development being assessed through a balanced judgement based on various factors however, these are in addition to the other criteria set out in the policy which essentially preclude the redevelopment of Category 1 and 2 employment sites for other uses.</p> <p>This brings into question how/if that part of the policy will actually be used other than in relation to Category 3 employment sites where the policy explicitly states that residential proposals will be supported.</p> <p>It is essential that Oxford does all it can to meet its own housing needs and therefore some flexibility on all category of employment sites should be provided. Conversely, there may be circumstances where employment retention on some Category 3 sites should be considered.</p> <p>Whilst we note that demand for employment space has remained strong, it is likely that less office space is required by some businesses located in the City than prior to the pandemic, creating opportunities for conversion of sites from commercial to housing, and thus more accommodation of housing need within the City than otherwise considered.</p>

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Policy E2 - Warehousing and Storage Uses	<p>Firstly, we recognise that land use for warehousing and storage should be prioritised for more efficient uses in most cases. However, it should be recognised 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.</p> <p>The policy only supports B8 uses where these are essential to support 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.</p> <p>We question whether the policy could be tightened up to make it clearer that where a use meets a Category 1 employment <i>use</i> rather than <i>site</i> (assuming that some sites have a mix of employment categories), this will be supported.</p> <p>The last sentence of the policy could be expanded to refer to potential impacts on the amenity of existing and future users and residents.</p>
Policy E3: Affordable Workspace Strategy and Affordable Workspace Provision on Commercial Sites	<p>We previously commented that 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.</p> <p>However, if this approach is viable then we support this to help assist those businesses who would not normally be able to afford to rent in the City, provided that this policy doesn't result in vacant units.</p>
Policy E4: Community Employment and Procurement Plans	<p>We agree that this needs to be a policy requirement rather than just encouraged, however there may be some examples where these requirements inhibit developments and careful consideration needs to be given to striking the right balance and providing a degree of flexibility where necessary.</p>
Policy E5: Tourism and Short Stay Accommodation	<p>We previously raised some concerns that letting the market decide how tourist accommodation shapes the City may be detrimental to the wider tourism economy in the County.</p> <p>We note that this proposed approach has now been significantly tightened up which is welcomed.</p>

Policy/Section	WODC response
4. A Green Biodiverse City that is Resilient to Climate Change	
Policy G3: Provision of new Green and Blue features – Urban Greening Factor	<p>The general approach taken in this policy is supported in principle.</p> <p>We note that the third paragraph of this policy sets out the minimum Urban Greening Factor scores for development. It is not clear why these scores are different to those used in London where the UGF assessment was developed and this could usefully be explained.</p>
Policy G4: Delivering mandatory net gains in biodiversity	<p>While the policy strongly encourages developments to provide more than 10% BNG, the Oxfordshire Local Partnership is keen for each of the Oxfordshire authorities to set their policy at 20% BNG, as part of their contribution towards nature’s recovery in the county.</p> <p>It is therefore somewhat disappointing to see reference to a minimum of 10% BNG rather than something more ambitious.</p> <p>The policy is supported in overall terms including the clear hierarchy of preference for the delivery of offsite enhancements.</p> <p>Since the drafting of this policy the secondary legislation for BNG has been published. This policy and supporting text will therefore need to be reviewed in light of this.</p>
Policy G6: Protecting Oxford’s biodiversity including the ecological network	<p>An important component of the ecological networks in both the county and the city are Conservation Target Areas (CTAs).</p> <p>Reference should therefore be made to these areas in Policy G6 and the supporting text.</p> <p>It would also be useful to include a figure/diagram like Figure 4.2 on the mitigation hierarchy near paragraph 4.35.</p>

Policy/Section	WODC response
Policy G8: Sustainable Drainage Systems	We welcome the emphasis placed on the provision of 'above ground' measures, in order to provide wider/multiple benefits.
5. A City that utilises its resources with care, protects the air, water and soil and aims for net zero carbon	
Policies R1: Net Zero buildings in operation, R2: Embodied carbon in the construction process and R3: Retro-fitting existing buildings	<p>We support the requirement that all new buildings should be net zero in operation and the requirement for an Energy Use Intensity calculation within an Energy and Carbon statement.</p> <p>The proposed whole building approach to retrofit is strongly worded and supported.</p>
Policy R7: Amenity and environmental health impacts of development	There could usefully be some further clarification in the supporting text to differentiate this policy from that of Policy HD10 on Health Impact Assessment.
6. A City of culture that respects its heritage and fosters design of the highest quality	
Policy HD2: Listed buildings	<p>The opening paragraph states: <i>Planning permission or listed building consent will be granted for development that respects and draws inspiration from Oxford's listed buildings, responding positively to their significance, character and distinctiveness.</i></p> <p>This is vague and could be misinterpreted, whereas Policy HD6 for non-designated heritage assets is more robust and states: <i>Planning permission will only be granted for development affecting a local heritage asset or its setting if it is demonstrated that due regard has been given to the impact on the asset's significance and its setting and that it is demonstrated that the significance of the asset and its conservation has informed the design of the proposed development.</i></p> <p>It is suggested that these differences could usefully be reconsidered.</p>
Policy D15: Bin and bike storage and external servicing features	Whilst the principle of this policy is supported, it would benefit from including reference to the storage of other wheeled vehicles, such as wheelchairs, mobility scooters and eBikes.

Policy/Section	WODC response
7. A liveable City with strong communities and opportunities for all	
Policy C1: Town Centre Uses	<p>We agree with the general policy approach but question whether the policy should also seek to avoid the concentration of single uses or uses which will likely cause amenity issues.</p> <p>We also question whether this policy needs to list all the city/ district and local centres or just refer to them and list them in the supporting text?</p> <p>We note that residential isn't a Class E use so the policy relating the local centres is a bit confusing where it refers to residential.</p>
Policy C2: Maintaining vibrant centres	<p>We previously commented that we generally agree with the proposed approach to protect frontages but changes to the Use Class Order may limit its effectiveness.</p> <p>Requiring a percentage of uses that should fall within Class E – Commercial, Business and Service is a sensible approach but it should be recognised that some important town centre uses such as theatres, libraries and museums fall within others classes.</p> <p>As such, some flexibility may be necessary particularly if units remain empty for a lengthy period of time.</p>
Policy C6: Transport Assessments, Travel Plans and Service and Delivery Plans	<p>We agree with the approach that transport assessments and travel plans should be required to review transport impacts. Given the car free aspirations of the City Council, this could be referred to more strongly in this policy with more emphasis on how these can aid this transition.</p> <p>As mentioned during the previous consultation, we remain of the opinion that the plan would benefit from a stronger focus on connectivity more generally. This could 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 on-line ticket purchasing etc.</p>

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<p>Policy C7: Bicycle and Powered Two Wheelers Parking Design Standards</p>	<p>We consider this to be an important element in achieving the City’s aspirations to significantly reduce private vehicles within the city. If successful, this policy should help significantly reduce the reliance on car journeys, particularly for short distances.</p> <p>Given the above, we would suggest that the bicycle parking standards for student accommodation should be tightened up by removing the ‘or’ from the two criteria.</p> <p>In terms of the bicycle parking standards, it may be helpful if the policy referred to more detailed standards set out elsewhere. This should also cover parking standards for the needs of disabled people etc.</p> <p>Finally, the policy could specify the need for bicycle parking to be conveniently located to changing rooms/showers and lockers where possible, to allow for easy access.</p>
<p>Policy C8: Motor Vehicle Parking Design Standards</p>	<p>The policy is very prescriptive so there needs to be a careful consideration as to whether this approach proposed is appropriate in the majority of circumstances.</p> <p>The policy focuses on parking restrictions but there is very little about design (for example the possibility of integrating parking into the street design and the ability to allow for future conversion).</p> <p>Also there is very little reference to how future technological development could shape parking.</p>
<p>Policy C9: Electric Vehicle Charging</p>	<p>We raise no objections to this policy although we wonder if it could be simplified with some of the details included within supporting guidance. Also, where covered by building regulations, some elements of the policy may not be necessary.</p> <p>There may be the opportunity to merge this proposed policy with a general policy covering parking standards if it is necessary to condense the number of proposed policies in the Local Plan.</p>

Policy/Section	WODC response
8. Development sites, areas of focus and infrastructure	
Paragraphs 8.6 – 8.8	<p>Here, the text suggests that because the new draft plan covers the period to 2040, there is an additional four years of unmet need to consider and that this has been the subject of ongoing discussions with the other Oxfordshire local authorities.</p> <p>Officers are concerned about these statements because they are predicated on a level of housing need which has been assumed by Oxford City (and Cherwell District) but not agreed with West Oxfordshire, South Oxfordshire or the Vale of White Horse District Councils.</p> <p>Please refer to the more detailed comments on Policy H1 and the supporting text outlined above.</p>
Policy NEOAOF – Northern Edge of Oxford Area of Focus	<p>In geographic terms, the most relevant area to West Oxfordshire is the Northern Edge of Oxford Area of Focus to the west and north of the Wolvercote Roundabout. Notably, one of the general principles for development in this location is that it should optimise connectivity and permeability for people wishing to walk or cycle in the area to other parts of the city and/or to destinations in the neighbouring districts of Cherwell District Council and West Oxfordshire. This is supported.</p>