

**Our ref:** Q210843  
**Email:** [REDACTED]  
**Date:** 05 January 2024



Planning Policy Team,  
Oxford City Council,  
Town Hall,  
St Aldate's,  
Oxford  
OX1 1BX

***For the attention of Planning Policy Team***

Dear Madam/Sir

**Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation Response on behalf of Oxford University Development Ltd**

**1 Introduction**

I write on behalf of Oxford University Development Ltd ('OUD') in response to the consultation being held by Oxford City Council ('OxCiCo' or 'the Council') on its regulation 19 consultation on the Oxford Local Plan 2040 Proposed Submission Draft ('the draft Plan').

OUD is a joint venture company between the University of Oxford and Legal & General, whose purpose is to deliver exemplary, sustainable housing and employment floorspace to support world class research and education. OUD owns sites in the City of Oxford and in Cherwell District. This includes the site identified in Policy SPCW7: Osney Mead which is the subject of a separate set of site-specific representations. These representations relate to the wider 'Vision and Strategy' (Chapter 1), policies relating to housing (Chapter 2) and the Employment Strategy (Chapter 3).

OUD is strongly supportive of the Council's broad approach and is glad that many of the suggestions in its previous representations (attached) have been addressed by the Council. OUD's remaining comments relate to:

- The Council's ability to meet its Objectively Identified Needs within constraints, principally environmental and heritage;
- The need for detailed housing policies to reflect the unique nature of the Oxford housing market, as identified in the Council's evidence base, so that it can meet the needs of the full range of different groups in the community as identified in paragraph 63 of the NPPF.
- The need for neighbouring Councils to continue to work to meet Oxfordshire's unmet needs, including employment needs;
- The need, given these constraints, to maximise the capacity of identified allocated sites, with the supporting infrastructure to enable this to be delivered sustainably, and to monitor provision and delivery if necessary identifying additional sites over the plan period.



Paragraph 230 of the National Planning Policy Framework published on 19 December 2023 states that local plans that have reached pre-submission consultation will be examined under the relevant previous version of the Framework. The Local Plan will therefore need to address the requirements of the previous Framework (September 2023) and all references to the NPPF and paragraph numbers refer to that draft. The soundness tests were (and remain) that the Plan must be:

- a) Positively prepared;
- b) Justified;
- c) Effective; and
- d) Consistent with national policy.

The representations set out in this letter are intended to ensure that the draft Local Plan can be found sound when examined by the Planning Inspectorate on behalf of the Secretary of State. We set out our recommendations on the vision and strategy that sets the foundation of the draft Plan. We then set out key considerations and highlight what are considered to be deficiencies in draft Policy S4 and H2, then recommendations to ensure they can be found sound. We respectfully request that the Planning Policy Team take this note into consideration when preparing the submission of the Oxford Local Plan 2040 (or any subsequent draft version of the plan that is issued for further consultation).

These representations should be read alongside those submitted by DP9 on behalf of OUD, relating principally to Osney Mead and employment uses (policy E1) and by Bidwells on behalf of Oxford University.

We would be happy to meet with officers to discuss these representations in further detail.

## 2 Vision and strategy

OUD endorse the overall vision for Oxford 2040 set out in paragraph 1.2 of the Plan, which sets the objective of making Oxford a healthy and inclusive city where everyone benefits from equal opportunities. It establishes the basis on which a positively prepared plan can be made. Where the vision could be strengthened is in more clearly recognising the special nature of Oxford as a global city of national and international importance. The plan-making process should reflect the exceptional role that Oxford plays within the UK and internationally and establishing a clear narrative behind this is important.

Suggested amendments to the vision could be made as below:

*"In 2040 Oxford will continue to be an internationally important city, globally renowned as a centre of excellence in learning, innovation, heritage and culture. It will be a healthy and inclusive city, with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare..."*



The above would more clearly set out the context in which the Plan has been made and help justify the more ‘bespoke’ approach it has taken. There is recognition of the exceptionality of Oxford elsewhere in the draft Plan. Paragraph 2.5, for instance, states that there are “*exceptional circumstances*” that justify diverging from the Government’s Standard Method for calculating housing need. Setting this out earlier on helps make clearer the justification for deviations from the ‘norm’ and the use of ‘innovative’ policies such as the key worker housing policy and restrictions on Houses in Multiple Occupation (‘HMOs’).

### 3 Meeting Needs

The presumption in favour of sustainable development requires that strategic policies in plans should “*as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*” subject to protective policies in the Framework and adverse impacts outweighing benefits.<sup>1</sup>

Oxford City faces a range of environmental, heritage and other constraints, whilst generally making strong efforts to maximise capacity to meet its own needs. In preparing the current Local Plan 2036 it worked pro-actively with neighbouring Authorities to identify how they could help meet its housing needs; as a result those Authorities have generally sought to include an allowance to meet Oxford’s needs over differing periods, for example Cherwell to 2031 and South Oxfordshire to 2035.

Oxford also has need for employment floorspace, and indeed national policy would suggest that it should be a national priority location for such uses. Previous approaches to strategic planning in the County had started to address these issues, but more recently the approach has faltered.

OUD supports Oxford City Council’s co-operative work with Cherwell District Council on these issues and has also responded to Cherwell’s draft Local Plan 2040. However it is clear from the Housing and Economic Needs Assessment 2022, Local Industrial Strategy and Oxford Employment Land Needs Assessment, that Oxford’s needs have not diminished but that its housing target to 2040 has been reduced and that no additional employment sites have been allocated. Paragraph 2.8 of the draft Plan confirms that housing need cannot be met in full within the City.

It will therefore be necessary, within environmental constraints and with supporting infrastructure, to maximise the capacity of sites, both in Oxford and in the ‘unmet needs’ sites in neighbouring authorities, and probably re-visit need requirements later in the Plan period in a strategic way. We have suggested wording on this in relation to Employment Land below.

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<sup>1</sup> NPPF 2023, paragraph 11(b).



## 4 Housing

This section focusses on policies relating to housing delivery, namely affordable housing. It sets out the challenges that the draft Plan should address based on its evidence base and the aim to deliver “the right kind of homes... to meet identified needs, and to deliver mixed and balanced communities and avoid over-concentration of any one type of housing or sector of the community.”<sup>2</sup> Whilst the focus of this is housing, these representations are made with a view to ensuring that cross-cutting objectives such as improving air quality, reducing congestion, and ensuring vibrant communities can be achieved. In short, that each policy can be as effective as possible in achieving the draft Plan’s stated objectives. As currently drafted, OUD consider there is a disconnect between the Plan’s evidence base, its desired outcomes, and the policies it sets out to achieve them.

### Overall housing requirement

OUD support the requirement set out in draft Policy H1 to deliver at least 9,612 new homes over the plan period. This aligns with the representations made by OUD to the Preferred Options consultation. Expressing the figure as a minimum recognises that the capacity is far outstripped by the identified need, and ensures that the policy is positively prepared and can remain effective over the lifetime of the Plan. As noted above the Council will need to be able to continually ensure that opportunities for new homes are maximised and to encourage the delivery of windfall sites: albeit the opportunity will be limited due to the nature of land supply in the City.

### Affordable Housing Tenure Mix and Viability

#### Background and context

Draft Policy H2 requires 40% of homes to be affordable, with 80% of those being social rented, and the remaining 20% provided as intermediate housing affordable in the Oxford market. In this regard, it maintains the same affordable housing tenure mix requirement as the adopted Local Plan 2036. Draft Policy H2 is supplemented by Draft Policy S4, which protects the provision of social rented housing at the expense of intermediate tenures and other planning obligations in the event of an open book viability assessment being carried out.

The two policies together amount to a presumption in favour of social rented affordable housing delivery over and above other affordable housing typologies and planning benefits. The policies are tightly worded, leaving little room for flexibility or consideration of new, or site-specific evidence.

The need for social rented dwellings within Oxford is clear. However, this need should be understood as one component of a larger, more complex, and more diverse need for affordable housing generally within the City. There is recognition of this through Draft Policy H5, which disapplies draft Policy H2 and permits a more bespoke approach to affordable housing provision for key workers that can be

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<sup>2</sup> Draft Local Plan 2040, paragraph 1.8.



agreed with the Council. This acknowledges that a 'one size fits all' approach to affordable housing provision may not be the right one for meeting the needs of key workers.

Oxford has the highest proportion of jobs (over half of all jobs in the City) of all cities in the UK that are high skilled jobs in publicly funded activities.<sup>3</sup> These jobs are relatively poorly paid compared to skilled employment in the private sector in other cities, and, when added to other core public service jobs for example in the NHS, schools and public administration, mean that Oxford has a very high level of 'key workers' with housing needs not addressed by social rented accommodation.

This points to a wider trend in the Oxford residential population, as captured in the Housing and Economic Needs Assessment 2022 ('HENA'). The HENA makes clear the challenges, noting that since the 2014 Strategic Housing Market Assessment:

- The affordability of housing continues to worsen;
- First time buyers are increasingly finding it challenging to afford housing;
- Private rents are increasing; and
- Rental supply is reducing with homes reverting to private sale.

Since November 2022 when the HENA was published, the lower quartile rent level has materially increased, in response to higher demand for rental properties.<sup>4</sup> This has increased the number of people who cannot afford private rent, but who would not be a priority for social rent. And this has happened at a time when private market rental properties have reduced as private landlords sell off homes; an issue that is expected to be compounded by higher mortgage costs.<sup>5</sup>

Consequently, households are increasingly faced with two options: either to share Houses of Multiple Occupation (HMOs) (which the draft Plan notes over 20% of Oxford's population have already done); or to join the Housing Register.

Whilst HMOs will continue to play an important role in Oxford's housing market (recognised through draft Policy H8), they can also cause challenges through the loss of family-sized dwellings, overcrowding, and being poorly regulated. They are clearly not a preferred option for households starting families. Draft Policy H7 and H8 seeks to tackle these challenges by limiting the loss of family-sized dwellings and preventing the over-concentration of HMOs in a particular area. The result is

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<sup>3</sup> Centre for Cities (2023) <https://www.centreforcities.org/blog/are-public-sector-relocations-a-tool-to-boost-high-skilled-jobs-in-struggling-areas/>

<sup>4</sup> HENA, Figure 4.13.

<sup>5</sup> HENA, paragraph 4.4.8.



effectively a cap on supply of rental properties that are at the lower end of market rates at a time when evidence suggests that such demand will increase.

Households entering the Housing Register would, until relatively recently, have been able to afford private rent, so are unlikely to be a priority. OxCiCo's website encourages the majority of households to consider other housing options instead of the Housing Register. This points to a negative feedback loop that needs to be more effectively disrupted than would be achieved by carrying forward the same approach to affordable housing as the adopted Local Plan.

### *Recommendations*

The HENA makes several key recommendations:

- that a greater diversity of housing provision is needed to tackle sources of unaffordability in the City;
- that the Council should avoid having a rigid policy for the split between social and affordable rented housing;<sup>6</sup>
- that the rental sector in Oxford needs to become more diverse, with a greater range of discount market rent products to provide for a range of affordability bands beyond social rent; and
- that there is a greater need for smaller homes than was identified in the Strategic Housing Market Assessment 2014 (and 2018 update).

The draft Plan acknowledges that there is a need to deliver a range of housing. However, there is currently considered to be a disconnect between the ambition and vision of the draft Plan on the one end, and the outcomes that the draft policies will have. Draft Policy H5 seeks to remedy this and for the sake of absolute clarity OUD support the draft policy and think that it plays a vital role in providing the housing that is clearly needed in Oxford. It is, however, naturally limited in scope regarding the impact it can make on the housing market due to the limited number of sites allocated by the policy. Even if all allocated sites were fully developed for key worker housing, this would make only a small impression on overall need for below market housing both among key workers but also in the City more generally.

Greater scope is needed to deliver a wider range of affordable housing typologies in the City. OUD therefore encourage the HENA's recommendations for greater flexibility in affordable housing typologies to be better reflected in draft Policy H2 and draft Policy S4 to ensure that they can be effective over the plan period and better justified by more closely aligning to the draft Plan's evidence base.

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<sup>6</sup> HENA, paragraph 9.4.6.



For draft Policy S4, there will be sites where it is important to safeguard providing social rented housing. There will be other sites, however, where more beneficial outcomes will be secured by protecting the overall affordable housing provision and allowing a greater proportion of those homes to be intermediate tenures. Equally, it may become preferable to safeguard other sustainable planning benefits, especially as the Council moves towards its net zero 2030 target. The point being that the Council should give itself the opportunity to make decisions based on the circumstances and information available at the point in time. This would make Policy S4 a more effective and deliverable policy for the Plan's lifetime.

As noted earlier, paragraph 2.5 of the draft Plan acknowledges that the particular blend of economic dynamism and high housing need in Oxford constitute exceptional circumstances. An exceptional approach to housing delivery is therefore required. Draft Policy H2 could do this and better reflect the recommendations of the HENA by:

- 1) increasing the required provision of intermediate tenure housing from 20% to 30%;
- 2) expanding the precedent set by draft Policy H5 in allowing the consideration of affordable housing on a case-by-case basis where this is justified by evidence of specific needs of different groups within the community across the whole City, rather than on specified key worker sites only; and
- 3) ensuring the definition of affordable housing fully reflects the breadth of housing needs identified and the range of tenures that are best suited to meeting these needs.

These changes would make the policy effective, justified, and better aligned with the NPPF paragraph 62. It is worth noting that OUD is an applicant that would benefit from the allowances made through draft Policy H5. OUD's interest, however, is broader and links to an understanding that what is good for the City is good for the University and vice versa.

## 5 Employment

OUD has covered its response on employment uses in relation to the draft Policies in Chapter 3 (A Fair and Prosperous City with a Globally Important Role in Learning, Knowledge and Innovation) in its response on the Osney Mead site submitted by DP9. We would re-state here the key point that the Plan as currently drafted is unlikely to meet the Oxford and Oxford Fringe (in neighbouring Districts) employment land requirement.

This suggests that there is a need to maximise the employment uses delivered on already allocated sites both within the City and in neighbouring sites such as Begbroke Science Park. It is likely that there will also need to be a review of site allocations in and around Oxford during the Plan period with a view to identifying additional capacity.



## 6 Summary

The draft Oxford Local Plan 2040 sets out a clear and positive vision for growing Oxford's economy whilst addressing the associated challenges this presents, namely in terms of offering a range of housing that meets the diverse needs of its population. Formulating policies that are able to deliver on this vision is, however, challenging and these representations have sought to put forward recommendations that will ensure the draft Plan is not only positively prepared, but is also justified, effective over the plan period, and consistent with national policies. In short, that it can be found sound at examination.

Through the process of preparing an outline planning application for the Begbroke Innovation District to the north of the City in Cherwell, OUD carried out a survey of OU staff to better understand the patterns of demand, need and habits of this large group. The results of that survey are incredibly informative and when combined with other research carried out by Quod and the independent assessments commissioned by the Council offer a compelling picture of what is needed to meaningfully relieve pressure on the Oxford housing market. OUD would welcome the opportunity to discuss these findings with Council officers further to help inform and support the draft Local Plan 2040.

Should you wish to contact me you can do so via the email address provided at the header of this letter. Thank you for taking the time to consider these representations and we trust that they have been of use in progressing the draft Local Plan.

Yours sincerely



**Senior Director**

enc. Representations submitted on behalf of OUD to the Local Plan 2040 Preferred Options consultation

cc. Tom Clarke (OUD)



**Our ref:** Q210843  
**Email:** [REDACTED]  
**Date:** 14 November 2022



Planning Policy Team  
Oxford City Council  
Town Hall,  
St Aldate's Street,  
Oxford  
OX1 1BX

For the attention of Planning Policy Team

Dear Madam/Sir

## **Response to Oxford Local Plan 2040 – Preferred Options Stage Consultation (Regulation 18) on behalf of Oxford University Development**

I write on behalf of Oxford University Development Ltd ('OUD') to submit representations to the consultation being held by Oxford City Council on the Oxford Local Plan 2040: Preferred Options (September 2022) document.

OUD is a joint venture company between the University of Oxford and Legal & General, whose purpose is to realise the development potential of the University's land holdings by delivering high quality housing and employment floorspace coupled with environmental improvements and sustainable social and transport infrastructure. Quod are instructed by OUD to act as the planning consultant for the preparation of a planning application to bring development forward on land to the north of Oxford and east of the A44 allocated by Policy PR8 of the Cherwell Local Plan 2011-2031 (Part 1) Partial Review: Meeting Oxford's Unmet Housing Needs. OUD manage a portfolio of sites both within and outside of Oxford City. These representations are written on behalf of OUD specifically as the promoter of development on the land allocated by Cherwell District Council through Policy PR8 to meet Oxford unmet housing needs.

The City and University of Oxford are clearly deeply entwined. The University is responsible for the City's status as a world-renowned centre of education and innovation and for attracting top talent and enterprise. In turn, the City provides the amenities and infrastructure that support investment and make it a highly desirable place to live. The scale of the success in attracting people to the City to learn, live and work has however created deep-rooted problems that both the University and City Council must address. Whilst it is essential that the local plan enables Oxford to sustain and fulfil its status as a world leading centre for knowledge based investment, OUD agree that other issues must be addressed, including the City's housing crisis; Oxford is one of the most unaffordable places to live in the country, with stark divides between areas of affluence and pockets of deprivation. These issues impact directly on the University, which is strongly motivated to play its part in finding solutions that will ensure that all those who come to Oxford can access good quality housing; that will foster economic growth; and that will enable healthy, happy, mixed and balanced communities.

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## 1 Representations

The Preferred Options document contains a series of proposed policy approaches or options that cover a range of topics. It does not include draft policies. The representations below are ordered to follow the headings and policy options in the document.

### Objectives and Strategy

OUN endorse the first objective: to deliver ‘a healthy, inclusive city to live in’ that provides access to affordable, high quality and healthy living accommodation for all. This ambition and its position as a key priority for the plan is supported, and OUN supports the drafting of policies to achieve this.

The Preferred Options document notes that the Local Plan 2040 will need to accommodate a variety of housing types, sizes and tenures. This is also commended. Oxford is comparable perhaps only to Cambridge in the uniqueness of its housing demand, and it is right that policies should be sufficiently agile to reflect this and allow for proposals which meet specific local requirements where they are supported by up-to-date evidence of particular need.

The second objective seeks to capitalise on the City’s economic success and foster further growth and recovery. It would be helpful here to acknowledge that Oxford sits at the heart of an innovation eco-system that stretches at least from Harwell Science and Innovation Campus in the south to Begbroke Science Park in the north. Many people live in Oxford but work in these out-of-City campuses and it is important that the Local Plan recognises this and seeks to ensure that proper connectivity is provided to enable these connections to flourish sustainably.

This relates to the Overarching Thread of the 15-minute city. As a guiding principle it is one that OUN supports but it must complement and not undermine the delivery of comprehensive and sustainable transport links over all distances (short, medium and long) where they are necessary to the successful functioning of the City.

### Strategic Policy Option Set S2: Approach to Greenfield Sites

OUN recommend Option A is taken forward. National policy is clear that efficient use should be made of brownfield land where possible, but this should not equate to a moratorium on the use of greenfield sites where appropriate. Development needs must be identified and land tested for its ability to meet them before restrictive policies are reapplied.

The option wording suggests that policies would be taken forward requiring that development maximises the efficient use of land on brownfield sites. There is no in-principle reason why a similarly worded policy should not apply to the use of allocated greenfield sites as well. Ultimately the scale of housing and employment need in Oxford makes it essential that the use of all suitable, available land in the City should be optimised; policy should reflect this.



### **Policy Option Set H1: Housing requirement for the plan period**

OUN recommend that the Council pursues the Preferred Option A. It is important that the Local Plan is deliverable and there is no evidence that pursuing the Alternative Option would achieve this without having to sacrifice other important ambitions and objectives. It is essential that the Council properly plan for delivering housing and a capacity-based requirement is justified in this context. The requirement figure must, however, be based upon up to date and robustly prepared evidence and be supported by qualitative policies in the Plan that encourage the optimisation of available sites for the range of diverse housing needs.

### **Policy Option Set H2: Housing need for the plan period**

OUN recommend that Option B is pursued as a basis for policy. Oxford's economy is important to the world; research and development carried out in Oxford is tackling some of the globe's biggest challenges including the climate crisis, world health issues and the COVID pandemic. It is right that economic growth should be supported in itself but also by delivering housing so that those who come to Oxford to work can have a reasonable expectation of also being able to live there in good quality accommodation that meets their needs. The functioning of the University and of the Oxford economy should not be unnecessarily constrained.

As is noted in the Preferred Options document, using the Standard Method to calculate housing need in Oxford risks underestimating the scale of need. It is important this is avoided and that the unique scale and nature of the need is properly and robustly considered.

It is likely that Oxford will have to work with its neighbouring authorities to address unmet housing need. This should not be shied away from, nor the housing need 'artificially' reduced to avoid this. Bold action is required, and Oxford should continue to work with its neighbours and cooperate in delivering housing that can alleviate the housing pressure in the City. This includes considering how policy can be best ensure that affordable housing delivered on sites outside of the Council's boundaries can address the broad range housing needs and sources of housing pressure arising from within the City itself.

### **Policy Option Set H3: Affordable housing – Overall requirement**

OUN recommend formulating a policy based on Option B. As the Preferred Options document rightly identifies, the affordability crisis in Oxford is such that the discounts applied to First Homes would be unlikely to match even an intermediate housing product in terms of affordability. An affordable housing policy should prioritise the delivery of intermediate products over First Homes. This allows for greater flexibility in the delivery of those intermediate products (allowing for typologies such as employer- and university-linked homes).

It is acknowledged that national policy requires the delivery of First Homes. However, there are instances of other authorities (that are similarly constrained and that suffer from severe unaffordability) disapplying the First Homes criteria within their jurisdiction (e.g., London Borough of Camden, and Brighton and Hove City Council).



OUN encourage the Council to ensure that affordable housing policies are reflective of up to date and detailed evidence and flexible enough to accommodate the City's very wide range of housing needs. This means accommodating those who in affordability terms may qualify for social/affordable rented housing, but who would otherwise not meet the criteria for having a local connection in the City. This is highly important given the profile of Oxford as a city that attracts people from all over the world to live and work, sometimes for relatively short periods of time. The risk is that this demographic is 'squeezed' out of accessing affordable rented housing and into potentially sub-standard accommodation that is not professionally managed and on expensive, short term contracts. This can have further consequences in the loss of family homes as homes become occupied by sharers.

A suitably flexible affordable housing policy should be formulated that acknowledges the important role that all of Oxford's communities play in its culture, economy and future growth. Policies that support employer-linked housing being delivered as affordable housing will be important to this (and are addressed below). However, given the scale and range of affordable housing needs in Oxford, it is important to formulate all relevant policies in a manner that can contribute to tackling the issue.

#### **Policy Option Set H5: Employer-linked affordable housing**

OUN recommend that Option A is taken forward as the basis for policy as this is in accordance with the NPPF's recommendation that planning policies reflect the housing needs of different groups in the community (paragraph 62).

We have set out above the risk of certain affordable housing needs being 'squeezed out' and unacknowledged. Allowing for employer-linked housing to be delivered as affordable housing will play a significant role in helping to address this gap. The Universities are a significant source of housing pressure in the City, but also one that has particular needs not best met by 'traditional' housing products. The Preferred Options document correctly identifies that employer linked housing can help relieve this pressure and we strongly support this conclusion.

To omit a policy of this type would risk failing to properly acknowledge the sources of housing pressure in the City. It would also directly contradict the NPPF as set out above and could therefore be found unsound.

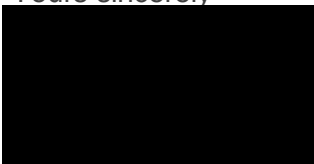
## **2 Summary and conclusion**

Appreciating that the plan-making process is still in its early stages, OUN is nonetheless supportive of the direction set out in the consultation. Helping address the housing needs of Oxford's Universities and other key employers means helping address the housing needs of the City as a whole. There are further benefits and opportunities here for the Council in partnering with the Universities to deliver multiple strategic objectives including sustainable patterns of growth, improved place-making, vibrant and active communities and environmental improvements.



We look forward to engaging with the City Council further as the draft plan progresses. Should you require any further information on the above, please do not hesitate to contact me.

Yours sincerely



Gregory Markes  
**Senior Planner**

enc.

cc. Tom Clarke (OUD)  
Matthew Sharpe (Quod)  
Claire Dickinson (Quod)