

Planning and Development

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Please ask for: Holly Jones

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5 January 2024

Dear Rachel,

Oxford Local Plan Proposed Submission Draft Consultation – Officer Response

Thank you for the opportunity to comment on the Proposed Submission stage of the Oxford Local Plan 2040 (OLP 2040).

Our comments focus on matters of strategic importance to Cherwell District Council. We trust that they can be taken forward constructively as part of the plan preparation process through Duty to Cooperate meetings and our ongoing officers' liaison between Cherwell District and Oxford City. We would also wish to record the high level of cooperation between our two Councils on strategic planning matters that occurs through the Future Oxfordshire Partnership.

Our comments have been prepared at officer level in consultation with the Planning Portfolio holder and should be treated as such.

Our comments

Housing need

Following the termination of the Oxfordshire Plan 2050 in August 2022, Cherwell and Oxford City Councils agreed to move forward with a new assessment of housing and employment need in the interest of progressing our respective Local Plans.

The Oxfordshire Housing and Employment Needs Study (HENA, 2022) was commissioned jointly by this Council and Oxford City Council to examine these issues. The Assessment recommended that housing need be understood on the basis of the projected share of employment across the county by 2040. It then presents four different alternative scenarios for housing need distributed according to that share of employment.

The Assessment concludes that its evidence points to an overall scale of housing need above the minimum level of need arising from the Standard Method. It states that the Standard Method underestimates housing need by not capturing demographic data post 2014, and not allowing for sufficient housing to match the level of job creation expected to 2040.

It is noted that the OLP 2040 has used Scenario 3: Cambridge Economics Economic Baseline as the basis for calculating its housing need. This is consistent with this Council's working assumptions set out in our Regulation 18 consultation on the Cherwell Local Plan Review. However, it should be noted that the consultation document also invited comments on the HENA and we are currently reviewing these responses before finalizing the Plan.

The HENA informs both the emerging Plans for Cherwell and Oxford, but each council will need to draw on this and wider Local Plan evidence to set their own housing need and capacity to meet it.

The OLP 2040 and its evidence documents propose a housing need of 26,440 dwellings (1,322 p/a) for the Plan period (2020-2040) based on Scenario 3 (Economic baseline) of the HENA (2022) and a capacity of 9,612 dwellings for the Plan period, leaving an unmet need of 16,828 dwellings.

14,300 dwellings of this unmet need have already been committed on sites outside the City boundaries in adopted Local Plans. Cherwell committed to delivering 4,400 homes of that unmet need in six sites allocated in the Partial Review Cherwell Local Plan adopted 2020. This and our own housing need will be monitored and reported on annually.

We note the OLP 2040 seeks to address an additional unmet need of 2,528 dwellings arising for the period 2036-2040.

All Oxfordshire Councils have already committed to deliver a large proportion of Oxford's previously identified unmet housing needs. It is therefore important that any additional unmet housing need is rigorously examined.

Before committing to taking any additional unmet housing need Cherwell District would want to explore further through the Duty to Cooperate process whether Oxford City can accommodate all or part of this additional need within its own boundaries.

It is noted that Oxford City has now, since launching the Local Plan consultation, approached Cherwell with a formal request to meet a proportion of its unmet housing needs. Cherwell would welcome discussions with all the Oxfordshire districts on how this is approached now that a formal request has been made. Within this context Cherwell will wish to retain the flexibility to accommodate any genuine unmet need according to its own spatial strategy.

Housing Capacity

We consider there may be more opportunities to increase capacity and would welcome further discussion on these and other matters including:

- an assessment of residential capacity on all category of employment sites where residential use or a mix of residential and employment would be suitable and the OLP 2040 policies amended to include a minimum residential capacity on these sites.
- exploring the addition of a review mechanism in the later period of the OLP 2040 to address this additional unmet need. This would help test whether the Policies are as effective at increasing housing capacity as intended and provide the necessary time for the Oxfordshire authorities to work on securing the delivery of the recently committed 14,300 unmet need

dwellings while delivering and planning for their own housing and employment needs prior to delivering any additional unmet need.

Policy H1 of the OLP 2040 proposes a capacity-based housing requirement of at least 9,612 new homes to be built in Oxford over the period 2020-2040. The policy commits to maximising housing capacity via housing allocations, efficient use of land/densities and allowing an element of housing on all suitable employment sites. As noted, we would like to discuss further opportunities to increase this capacity and that monitoring captures this.

The Plan's employment evidence indicates there is a considerable surplus of Office and Research and Development (R&D) supply when considered against need in both low and high growth scenarios.

Table A3 Demand/ Supply Balance (Lower end floorspace estimates)

| | Oxford 'low' growth* | Oxford 'high' growth* |
|-----------------------------------|----------------------|-----------------------|
| Office and R&D E(g)(i),(ii) (sqm) | | |
| Floorspace need | 218,300 | 249,040 |
| Supply | 607,561** | |
| Balance (+)/(-) | +389,261 | +358,521 |

Extract from Appendix 1 of OLP 2040 Background Paper 6b.

We note that employment Policy E1 does not allocate land for employment uses but protects the city's most important employment sites encouraging their modernisation and intensification and restricts new employment floorspace opportunities to the existing network of employment sites and to the city's most sustainable locations. We also note the policy includes some criteria for residential development on employment sites.

Although these policies would enable residential development if it were to come forward, we consider that OLP policies and evidence should be more proactive. For example, they should establish a minimum residential capacity for all employment sites where residential development could be accommodated. At present this opportunity is not quantified.

Whilst acknowledging that within the HELAA 2023 officers have taken a view on whether sites have been promoted for residential use to assess their availability, we are of the view that the acute housing need picture presented in the OLP2040 requires a greater scrutiny of the employment/residential balance within the City. This includes exploring the viability of some element of residential development in suitable employment sites of any category with a numeric capacity attached.

The Plan seems to have a greater focus on the residential potential of Category 3 employment sites, however, there is no indication of potential future capacity from these sites to support the aims of Policy H1. It is also not apparent that this approach has yielded a significant element of capacity to date. It would be helpful if these were mapped for clarity.

Site allocations

We welcome the accessibility requirements in Policies SPN1 (Northern Gateway) and SPN2

(Oxford University Press Sports Grounds) which seek the integration with adjoining sites in Cherwell and note the opportunity highlighted in paragraph 8.20 of the OLP for a potential holistic approach to the development of Northern Gateway and the adjoining parcel of land within Cherwell.

A number of sites are taken forward to allocation in the OLP 2040 with a minimum residential capacity and a higher one if the existing sports facility could be relocated off site, such sites include SPS6: Sandy Lane recreation ground and SPN2 OUP Sports Ground.

We acknowledge that enough sport and recreation infrastructure should be in place to offer a good quality of life within the City but in the context of a Local Plan capacity-based housing requirement, we consider that the Local Plan evidence should be supported by a more in-depth exploration of the need for such facilities and whether facilities can or cannot be relocated particularly if the site is allocated for housing.

We would welcome a discussion on how the range of housing numbers in site allocations have informed the capacity based housing requirement and how the assessment of open space, recreation and playing pitches needs within the City has been used to inform the assessment of sites in the HELAA 2023 and the allocation of sites in the OLP 2040.

It is noted that Kassam Stadium and Ozone Leisure Park (Kassam Stadium and Ozone Leisure Park) is also allocated with a range of housing capacity. It is also noted that the Policy states the football stadium should remain unless it has been replaced elsewhere in Oxford or in proximity to Oxford.

Residential development should be maximised on any redevelopment of this site regardless of the relocation of Kassam Stadium. According to HELAA 2023 parts of the Ozone are vacant, and the policy should prioritise a range of uses which maximise the residential capacity.

Habitats Regulation Assessment and addendum on air quality

It is not apparent whether the in combination effects on Habitats reflect the planned, but not inconsiderable, undelivered growth from other Plans. It would be helpful if this could be clarified.

The air quality addendum is a useful addition, though it would be helpful if the involvement of National Highways was clear.

Playing Pitch Strategy

We note that there is no evidence on Golf needs in the City's Playing Pitch Strategy 2022-2036. It is important that this gap in the evidence is addressed considering the commitment in the Cherwell's Local Plan Partial Review to the potential relocation of the North Oxford Golf Club. Evidence of need in the wider area will be required, to support a planning application, for Cherwell's Site PR6b.

General comments

We would welcome a clear table with the number of homes to be delivered and when, if this is available in a background paper, please advise but considering the capacity-based context of the OLP more should be contained within the LP on delivery of the housing requirement, including a housing trajectory.

We note the General Statement of Common Ground supporting the OLP 2040 and look forward to further engagement to address cross boundary matters such as transport and other infrastructure, HRA and Air Quality in addition to the housing capacity matters detailed in this letter.

We hope you find the above comments constructive and look forward to continue on-going engagement ahead of finalising your Local Plan. We have indicated that we would wish to participate in the Examination.

Yours sincerely,



David Peckford
Assistant Director – Planning and Development

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