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**Planning Policy Team
Oxford City Council
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Dear Planning Policy,

Oxford Local Plan 2040 Proposed Submission Draft (Regulation 19) Consultation

Oxford City Council ('the Council') is currently consulting on the Draft Oxford Local Plan 2040 Submission Draft (Regulation 19) dated November 2023 ("Draft Local Plan"), alongside a Community Infrastructure Levy ('CIL') Draft Charging Schedule. These representations, prepared by DP9 Limited ('DP9') on behalf of Oxford University Development Ltd ('OUD'), relate to the Draft Local Plan and focus on its implications for the future redevelopment of the Osney Mead site. Representations in relation to the proposed CIL Draft Charging Schedule have also been provided under separate cover.

OUD is a joint venture partnership bringing together the land and opportunities of Oxford University with the investment and development management skills of Legal & General. OUD's vision is to design and deliver exemplary, sustainable development that meets the future needs of Oxford University, contributes to the wider economy of Oxfordshire and creates economic and social benefits for local communities. Osney Mead is one of several sites that OUD is seeking to bring forward and is a major strategic development site identified by the Council as playing a crucial role in realising the vision and objectives set out within the Draft Local Plan.

These representations follow on from OUD's previous involvement in the Local Plan consultation, including representations submitted for the Preferred Options Local Plan stage in November 2022 and discussions with Oxford City Council regarding the site allocation wording for Osney Mead.

OUD continues to generally support the vision and aspirations of the Local Plan, but makes the following representations as set out in chronological order:

Chapter Two: A Healthy and Inclusive City to Live In

OUD supports the principle of referencing Osney Mead as a possible location for employer-linked affordable housing (Policy H5). The deliverability of such housing – as well as other housing products more generally – will be dependent on a range of factors, including the significance of flooding as a land use constraint.



Chapter Three: A Fair and Prosperous City with a Globally Important Role in Learning, Knowledge and Innovation

OUN is supportive of the critical role that Oxfordshire can play in the national economy as set out in the Strategic Economic Plan (2016), the Local Industrial Strategy (LIS) and the Local Investment Plan (LIP). OUN notes that the Oxfordshire Authorities, when working together to look at long-term strategic needs for the County, to meet those strategic economic targets, through the Oxford Needs Growth Assessment (OGNA) identified the City Centre and City Fringe – the latter spanning the boundary with neighbouring authorities – as key potential locations to accommodate economic needs.

This is reflected in the Council's Economic Strategy (2022-32) which identifies Oxford's role in a wider 'Innovation Eco-System' including Oxford City and the 'City Fringe'. OUN's site at Osney Mead is a central City site whilst Begbroke Science Park (in Cherwell District) is in the 'City Fringe', but interacts strongly with the Oxford economy.

OUN agrees with paragraph 3.6 of the Draft Local Plan that 'Oxford is the most sustainable location within the County.' This is particularly important for central Oxford, but also for the wider 'City Fringe'. Given the environmental and other constraints facing the City it is important that the capacity of these sites is maximised. The Oxford Employment Land Needs Assessment Oxford Employment Update Report (2023) is cited in paragraph 3.8 of the Draft Plan as the source for the employment need for Oxford being between 269,000 and 348,000 sqm. We are unclear about the source of this number as the Evidence Base list only appears to include an Interim Report (2022) which does not include this range. Table 1 and Paragraph 2.33 of the Oxford Local Plan Background Paper 6a attribute this range to the Housing and Economic Needs Assessment (HENA) with approximately 175,000 sqm to 250,000 sqm of this being offices and Research and Development.

The ELNA interim report (Table 6.1) uses five scenarios, with a top end of the range being 324,700 sqm, based on the 'transformational trajectory' in the Growth Needs Assessment, based on the Local Industrial Strategy. This total is above the top end of the range of employment need identified in the Draft Local Plan. Oxford University has also commissioned research from Bidwells, which is included in its representation to the Draft Local Plan, which finds that need is likely to exceed this higher end estimate.

Chapter 6 of the NPPF identifies the need to support economic growth.

"This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential." (paragraph 81)

It also states (para 82a and d) that Plans should:

*"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, **having regard to Local Industrial Strategies and other local policies for economic development and regeneration;**"*

*"**be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.**" (own emphasis)*



And that:

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries...” (para 83)

Oxford is one of a small number of places in the UK that meets all of these criteria and it is therefore particularly important that the Draft Local Plan strives as far as possible to plan for needs positively and flexibly within Oxford’s constraints. On this basis it is OUD’s view that in order to be ‘Positively Prepared’, Justified (on the basis of the Council’s evidence base and the Local Industrial Strategy) and consistent with National Policy the wording of Policy E1 should be strengthened.

The reference to upgrading and re-use unnecessarily duplicates proposed Policy R2 and should therefore be deleted. Furthermore, the dynamic nature of research and learning means how space is used and serviced is continually rethought. New research and learning will require new facilities the like of which the Universities’ estates cannot entirely accommodate within existing structures.

Suggested tracked changes text is set out below:

~~*“Employment sites should make the maximum use of site capacity within environmental constraints to meet the needs of key employment sectors including innovation and research and development. All new development on employment sites needs to show that it is making the best and most efficient use of land and premises and positively promotes sustainable development through the upgrading and re-use of existing buildings and does not cause unacceptable environmental impacts...”*~~

It is also suggested that an additional part is added to the policy:

“Monitoring and Meeting Unmet Needs

The Council will monitor the delivery of employment floorspace in the context of the wider Economic Strategy for the City, the County and other strategic policies, and work with partners, including neighbouring Oxfordshire Authorities, to intensify current sites and/or allocated additional sites should that be necessary...”

OUD notes the importance of strategic planning to ensure that any additional employment floorspace can be delivered sustainably, linked with the development of new homes and infrastructure and will work with Oxford City Council to help identify and deliver such requirements and secure funding, including from Central Government, to deliver that infrastructure.

OUD continues to support the intensification and modernisation of Category 1 and 2 Sites, such as Osney Mead. However, in order to meet identified employment land needs of 269,000 – 348,000 sqm over the Plan period, some flexibility with regards to bulk, scale and massing and the further expansion of existing employment sites must be considered. It should be noted that Osney Mead is probably the most sustainable potential location in Oxford for large scale additional employment provision given its central location close to the University, residents, the station and bus services.

Policy E1 regarding employment strategy includes criteria associated with the potential development of residential use on employment sites. OUD agrees with the criteria as listed but recommends making



explicit reference to prioritising employment use on allocated employment sites and, in particular, where environmental constraints – especially in relation to flooding – act to limit or constrain the nature and type of residential use / product that can be viably delivered. Paragraphs 3.10 to 3.12 define ‘employment’ uses as employers and sectors within Use Class E(g), B2 and B2. This should be updated to include for university research buildings (Class F1) akin to research and development uses (Class E(g)(ii)) to support these uses coming forward.

Policy E3 provides a requirement for specific sites to deliver affordable workspace. The principle of this is supported by OUD. But the policy, in the absence of any detail, should make clear that the nature of such workspace will be agreed on a site specific basis and that the amount and terms for what can be provided will be subject to development viability.

OUD supports the intent and principle of Community Employment Plans as set out in Policy E4. However, OUD is concerned that some of the criteria and requirements listed sit outside of the scope of planning and go beyond the remit of a Local Plan (in the context of NPPF paragraph 16). Several criteria will be wholly dependent on specific property ownership / lease structures and are commercial property matters.

Chapter Four: A Green Biodiverse City That Is Resilient to Climate Change

Objectives for positive outcomes for people and planet which include enhancing and connecting the natural environment are supported by OUD.

Policy G2 requires sites greater than 1.5 ha to provide new public open space of 10% of the area covered by residential development. Further clarification is required as to what type of residential accommodation this relates to e.g. does it also include student or graduate housing?

Chapter Five: A City that utilises its resources with care, protects the air, water and soil and aims for net zero carbon

OUD supports the delivery of exemplary sustainable development and targets for net zero carbon. The vision for Osney Mead is underpinned with ambitious headline objectives to achieve this, including OUD’s target to deliver a net zero carbon estate by 2035.

Policy R1 requires developments to be designed in accordance with the energy hierarchy. As a last resort, offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either on site or through an identified offsite location through a legal agreement. The applicable amount (£ per tonne of CO₂), as supported by evidence, should be clarified in the event that off-setting is required and for transparency in in line with viability considerations set out in Policy S4.

Policy R1 sets out specific Energy Use Intensity (EUI) targets for both residential and non-residential uses at Part 2. This includes a target of 70kWh/m²/yr for non-residential developments. This policy should be updated to acknowledge the varying EUI requirements of different commercial uses. For example, an industrial use or Research and Development incorporating laboratory uses have higher EUI requirements than office or a retail development. This approach has been taken into account in the emerging Cambridge Local Plan Policy CC/NZ.

Policy R2 relates to expectations for the consideration of embodied carbon in the construction process and take actions to limit this as much as possible through careful design choices. While we are supportive of the principle of this policy in order to meet Net Zero objectives, the policy needs to acknowledge that the feasibility of retaining existing buildings does not just relate to technical



considerations such as structural limitations or operational requirements. Wider objectives of the Local Plan, including the planning requirements for the site, must also be an important consideration when considering any demolition. It must also acknowledge that sometimes demolition is the only route to achieve these objectives including strategic transformation and although there are higher embodied carbon costs associated with this route initially, it may derive larger carbon savings in the future, along with wider social and economic benefits. On this basis, it is crucial that any new policy focusses on consideration of retrofit/refurbishment-first as opposed to a retrofit/refurbishment-only policy, while having regard to the requirements for the site.

Chapter Six: A City that respects its heritage and fosters design of the highest quality

Policy HD8 relates to using context to determine the appropriate density for development proposals. The policy acknowledges that high-density development is expected in highly accessible locations in of the district centres, and in the city centre, where feasible in the context of heritage. This approach is welcomed in order to make the most efficient and best use of limited land within the city centre. We would encourage further guidance in relation to strategic site allocations and large areas which are planned for intensification and transformation such as Osney Mead, which will create a new context because of their size and scale in Policy HD8. In short, the Plan should make reference and recognition to the fact that large-scale redevelopment and regeneration projects need to acknowledge existing context but also have the opportunity to create new transformative context.

Policy HD13 relates to outdoor amenity requirements for dwellings. The plan should be made clearer as to whether this standard applies to new student accommodation or graduate housing, in line with Policy H9 (b).

Chapter Seven: A liveable city with strong communities and opportunities for all

OUN welcomes the commitment within the Draft Local Plan (paragraph 7.24) to support the County Council's measures set out in the Local Transport Connectivity Plan and Central Oxfordshire Travel Plan, which encourage a move away from private vehicle journeys where possible and support active travel options and public transport.

Draft Policy C6 on 'Transport Assessments, Travel Plans and Service and Delivery Plans' requires developments to ensure 'there is no impact on highway safety' and 'no unacceptable residual cumulative impact on the road network'. Draft Policy C6 should be updated to align with the policy tests in the National Planning Policy Framework (NPPF), December 2023, in which 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe' (emphasis added).

Chapter Eight: Development Sites, Areas of Focus and Infrastructure

OUN continues to strongly support the regeneration of the West End or 'West Infrastructure Area' which will have an influential role in meeting economic and housing needs for Oxford.

OUN thanks Officers to date for their collaboration on the emerging Site Allocation for Osney Mead as set out at Policy SPCW7 and fully endorses the aspirations for the Site as an innovation quarter. However, we are of the view that reference to "248 dwellings" is too specific and should set a broader capacity guide, which will be ultimately established by comprehensive masterplanning.



Summary

We trust our comments will be taken on board in progressing the Draft Oxford Local Plan 2040 Submission Draft (Regulation 19) and we look forward to continuing to engage further with you in the future.

Yours sincerely,



DP9 Ltd