

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

5<sup>th</sup> January, 2024

Dear Oxford City Council Planning and Policy Team

**Re: City of Oxford Local Plan Regulation 19 – Advanced Oxford response**

## **A. Introduction**

This letter forms the response by Advanced Oxford to the City of Oxford Local Plan Regulation 19 consultation.

## **B. About Advanced Oxford**

Advanced Oxford is a group of senior leaders from the area's major knowledge-intensive businesses who are working together to support the long-term development of the Oxford region as a dynamic and prosperous place to work and live.

Advanced Oxford is a research-led, providing insight, analysis and a united voice for our members on the key issues affecting the development of the innovation ecosystem in the Oxford region.

### **Oxford and Oxfordshire – a scientific super-cluster**

The ambition to place the UK at the forefront of science and technology is embodied in the Government's concept of the UK as a 'Scientific Superpower'. The role of science and technology in fuelling economic growth and new jobs is at the heart of this ambition. [Oxfordshire's Innovation Engine, 2023](#), has been produced to ensure that Oxfordshire builds on its position as a leading tech cluster, and to assist in positioning Oxford, and the Oxfordshire region, as a place that is consistently associated with science and innovation.

Oxfordshire's innovation ecosystem -

- Oxfordshire is a thriving innovation ecosystem which has grown and developed substantially in the last 10 years
- The region is recognised for its universities and research institutions and for its strong industrial base and its thriving community of spin-outs and start-ups.

- There are 2,950 high-tech businesses employing 29k people.
- 1,500 of these companies are highly innovative, science, technology, engineering and maths-based companies.
- 12k people are employed in R&D intensive companies.
- 5.7k patent applications have been made by Oxfordshire based firms and institutions in the last 5 years (to 2022).
- The region's science parks and campuses have swelled in numbers and have grown substantially in the last decade.
- 64% of the region's businesses are innovation-active according to the UK Innovation Survey

Oxfordshire's Innovation Engine – “*a jewel in the crown of the UK Innovation Economy*”

The first Oxfordshire Innovation Engine report, *Realising the Growth Potential*, was published in the autumn of 2013. It was followed two and a half years later by an ‘*Update Report*’ that assessed progress against the actions and recommendations proposed in 2013. Ten years on, Advanced Oxford has produced *Oxfordshire's Innovation Engine 2023*, which reassesses the region's science and technology ecosystem, looking forward, but also looking back over the last decade.

Oxfordshire has a thriving and diverse innovation ecosystem. The region's knowledge economy has grown considerably in the last decade, both the stock of companies and employment, although high and medium-tech manufacturing has declined, possibly as manufacturing activities move out of the region as companies scale. The region's growth has a more international outlook. Companies that started in Oxfordshire are trading and expanding internationally as inward investors into new territories, reflecting the global markets in which they operate.

Key current challenges include infrastructure, skills and housing.

Recommendations from *Oxfordshire's Innovation Engine, 2023*:

*Recommendation 1:* Strengthen leadership across the region in relation to innovation.

*Recommendation 2:* Develop a much needed, future-looking transport system, which is Oxfordshire-wide, not just focused on the City of Oxford.

*Recommendation 3:* Grow and diversify the number of risk capital investors operating within the region.

*Recommendation 4:* Develop a new clear, strategy, with collective buy-in, for inward investment into the region. Different players within the ecosystem need to work together to ensure that Oxfordshire is open, coherent and can respond to potential investors.

*Recommendation 5:* Join up nodes of innovation across the region and help internal and external stakeholders to navigate the landscape through better defined pathways and connectors.

*Recommendation 6:* Develop a suite of communications tools and assets, tailored to the needs of different audiences, which can be used by all players, to tell Oxfordshire’s innovation story.

Oxfordshire is one of the main centres for UK science, technology and innovation. Advanced Oxford wishes to see that position maintained and grow given its importance to both Oxford, Oxfordshire and the UK.

Key features that are critical for its future economic success include – active research, available sites and premises, educated and motivated staff, available affordable housing, good infrastructure and a high-quality environment. Oxfordshire has many of those features, but they need continued support and modernisation in which the planning system, and most importantly the environment, set through adopted Local Plans, is critical.

A copy of *Oxfordshire’s Innovation Engine, 2023* is attached to this letter.

Our website <https://www.advancedoxford.com/> contains a wealth of additional research and publications relevant to the local and regional economic effort.

## **C. Conformity with the NPPF**

We note that Local Plans need to be prepared in conformity with the NPPF.

The NPPF requires that Local Plans should be prepared with reference to up to date evidence. As the NPPF records (Para 31):

*'The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate...'*

OxLEP has recently updated its Strategic Economic Plan (2023) and, together with the Advanced Oxford *Oxfordshire’s Innovation Engine 2023*, should be considered as forming part of the relevant local economic evidence base for the City of Oxford Local Plan. Both documents provide an up-to-date overview of market signals relevant to Oxfordshire and the key economic sectors that should be supported to grow. The Advanced Oxford strategy in particular focuses on the science, technology and innovation dimension of the Oxfordshire economy. As the NPPF records (Para 31):

*'The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate...taking into account relevant market signals.'*

## **D. General comments on the City of Oxford Reg 19 Local Plan**

### **D.1 Completing the Local Plan Review**

We welcome the fact that Oxford City Council has moved at pace to complete its Local Plan Review and is close to completing within the 5 years stipulated by the NPPF. As Para 33 records:

*'Reviews should be completed no later than 5 years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy.'*

It is disappointing that other Local Planning Authorities in Oxfordshire are not proceeding at the same pace, meaning that important economic needs and opportunities are at risk of not being met.

We welcome the position that Oxford City continues to take as a pro-growth Council.

## **D.2 Meeting Economic Need and Opportunity**

We note the important role that the economy of Oxford City plays as an economic driver for Oxfordshire and the UK as a whole. Continued investment in science and innovation is critical for the current and future success of the local and UK economy.

Science and technology parks are essential for providing the space for companies to invest and grow, and for the region's Universities and businesses to translate and spin out the applications of their research into businesses and new economic activity.

We welcome the focus that Oxford City has placed on its economy and employment, with Chapter 3 of the Reg 19 Local Plan being strong in this regard. Chapter 8 also proposes new Development sites, areas of focus and infrastructure. This is important for securing business development, inward investment and science applications.

As the NPPF sets out in para 20 – *'Strategic policies should ...make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development;'*

But, while the Oxford Plan and the HENA on which it is based, respond to economic projections it is not clear that sufficient provision is being made for new inward investment and other economic opportunities.

The NPPF (Para 31) requires:

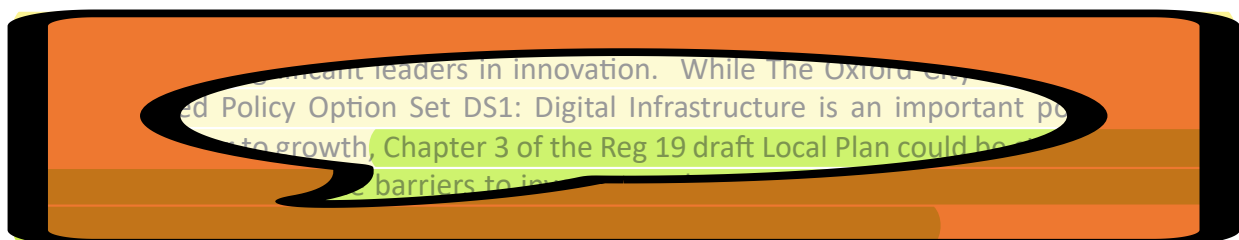
*'The preparation and review of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate...taking into account relevant market signals.'*

The OxLEP SEP (2023) and the Advanced Oxford *Oxfordshire's Innovation Engine 2023* report provide a detailed overview of the needs of the science, innovation and technology sectors in

Oxfordshire and should be used to refine the proposals set out in the City of Oxford Reg 19 Local Plan and merit reference in Chapter 3.

As NPPF records at Para 85:

*'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. 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.'*



NPPF Para 86 also records:

*'Planning policies should:*

*a) 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;'*

It is not clear that the Oxford City Plan has gone far enough to respond to the guidance of the NPPF on planning for economic need and inward investment. The proposed Local Plan should explicitly draw on the OxLEP SEP and the Advanced Oxford *Oxfordshire's Innovation Engine, 2023* report, as well as the HENA, to provide a clearer and stronger economic vision and strategy that reflects critical economic sectors to positively and proactively encourage sustainable economic growth.

*b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

*c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

*d) 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.*

The proposed draft Local Plan does not show how all the barriers to investment are to be tackled, though as noted earlier the Oxford City Reg 19 draft Local Plan proposed Policy Option Set DS1: Digital Infrastructure is an important policy in this regard. The draft Local Plan does not include policy to support economic needs that arise during the life of the Plan and enable the City to flexibly respond. It would be sensible for this issue to be addressed collaboratively with neighbouring Planning Authorities as the Advanced Oxford *Oxfordshire's Innovation Engine, 2023 report* advocates.

NPPF also proposes at para 87:

*'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; and for storage and distribution operations at a variety of scales and in suitably accessible locations.'*

The draft Oxford City Local Plan does not sufficiently consider specific sector needs, or the opportunity for strengthening existing clusters or creating new clusters of science and innovation-based industries and how that will be supported. The Oxford City Plan should explore going further to show how specific sectors are being catered for and how key clusters and market demand are to be supported. Clearly the closure of OxLEP as an independent economic development focused organisation makes the support environment more challenging.

### **D.3 Meeting housing need**

We welcome that Oxford City proposes to allocate as much new housing as the physical space within its tightly constrained boundary allows. Reg 19 draft Local Plan Chapter 8 Development Sites, Area of Focus and infrastructure sets out a series of proposed growth locations and illustrates these constraints.

We note that the housing need figures are based on the HENA commissioned with Cherwell Council and published in January 2023 and sets out an approach that is consistent with the NPPF para 23 - *'...to address objectively assessed needs over the plan period...'*

We also recognise that Oxford City has sought to ensure that in the preparation of its new Local Plan its strategic policies meet the NPPF requirement of (para 20 a):

*'Strategic policies should ...make sufficient provision for:  
a) housing (including affordable housing), employment, retail, leisure and other commercial development;'*

We note that this means that there is a significant level of unmet housing need to be met by neighbouring Councils within the housing market of Oxfordshire, an unmet housing need that includes a significant level of affordable housing.

The availability of housing is an essential component of economic growth. The affordable housing element is significant in both the City of Oxford and the surrounding area where the cost of housing is exceedingly high. Without proactive steps being taken to increase the housing supply, as sought by the City Council, housing will become more and more expensive, undermining the ability of local residents to live in the City or the surrounding Districts, increasing the level of commuting and reducing the attractiveness of Oxford City and Oxfordshire as a place to invest and to pursue business growth.

We support the steps that Oxford City have taken to increase housing supply, including the establishment of its own housing company, and seeking to encourage innovation in the type of housing to be built to both reduce costs and to ensure a mix of housing sizes and types are provided to meet local need.

We welcome Policy Option Set H5 Employer linked affordable housing as an encouraging further innovation in the housing approach by Oxford City.

#### **D.4 Meeting unmet housing need**

We note that the balance of housing need required by Oxford City has to be addressed by its neighbouring Councils within Oxfordshire, which together form a single Oxfordshire wide housing market area. The Advanced Oxford *Oxfordshire's Innovation Engine, 2023* report highlights the importance of housing provision to supporting the economy of Oxfordshire and the growth of the science and innovation sectors.

We welcome that Oxford City and Cherwell Councils continue to proactively collaborate on strategic planning matters, despite political differences, through the commissioning of the joint HENA and the steps that Cherwell Council has subsequently agreed to take to meet a proportion of the unmet housing need of Oxford City. It is to be hoped that the remaining Councils (South Oxfordshire, Vale of White Horse and West Oxfordshire) take similar positive steps to meeting a fair proportion of the unmet housing need of Oxford City.

We trust that Oxford City is taking active steps to negotiate with these Councils to ensure the full unmet housing needs are met within Oxfordshire, given that the need for housing is critical to supporting the continued economic success of the City and the County as a whole.

We look forwards to reading a comprehensive Statement of Common Ground agreed between the 6 Councils in Oxfordshire, showing positive engagement and a comprehensive response to meeting Oxford's unmet need and other issues.

#### **D.5 Meeting transport and infrastructure needs**

As the Advanced Oxford report *Oxfordshire's Innovation Engine, 2023* highlights, improved transport links is critical for the economic success of Oxfordshire.



One weakness of the draft Oxford City Local Plan is the absence of transport modelling to test the Plan proposals. We note that this gap has arisen from the lack of an up to date County-wide transport model. This raises questions about the ability to deliver the City Local Plan and other neighbouring Local Plans.

This gap can be expected to undermine the ability of the draft Local Plan to meet the tests set out in NPPF para 35 of being a) positively prepared, b) justified and c) effective. If the Plan cannot be shown to be deliverable it may be judged at Examination to not meet the NPPF tests.

This assessment gap also means that transport infrastructure needs have not been identified. As the NPPF requires in para 22:

*‘Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.’*

The need for transport improvements to accommodate new growth needs to be considered beyond the immediate Oxford City boundary.

There is also the need for up-to-date digital infrastructure provision on new science and technology parks, and across the whole County.

There is a growing gap between the level of planned housing and economic growth in Oxfordshire and the availability of energy and grid supply and water supply to avoid water stress. The need to close this gap and ensure future needs are met is becoming more urgent. Collaboration between the 6 local authorities is essential on these matters, but it is not clear what action is being taken to avoid future difficulties.

## **D.6 Supporting the Ox-Camb Arc**

The Ox-Camb corridor (previously referred to as the Ox-Camb Arc; and referred to within this letter as the Arc) has been a matter of Government policy since it endorsed the NIC report proposing the creation of the Arc between the two cities, together with the wider corridor to secure nationally significant economic growth, together with an expansion of housing, improved connectivity through new rail and road investment. Support from the Government establishes the Arc as a matter Local Plans need to take into account.

As the NPPF Para 6 records – *‘Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.’*

The draft Local Plan should refer to the Ox-Camb Arc, given its importance to the City and Oxfordshire, and the emphasis placed on growing the economy of the Arc.



## Collaboration on Oxfordshire wide development challenges

There are a number of areas where the Oxford City plan should refer to collaboration with the other Local Planning Authorities for the benefit of Oxfordshire as a whole.

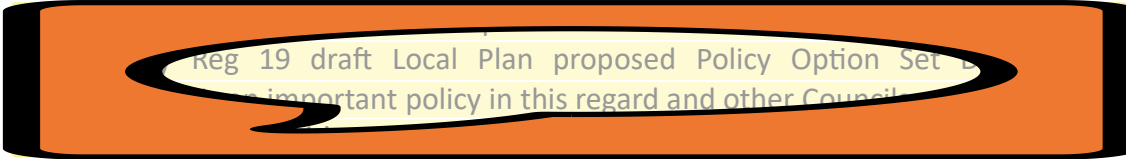
### D.7 Proving Infrastructure

As the Advanced Oxford report *Oxfordshire's Innovation Engine, 2023* highlights, improved transport links and other infrastructure are critical for the economic success of Oxfordshire.

Given how tightly drawn the administrative boundaries of the City are, improving its supporting infrastructure requires collaboration and joint planning between the Local Planning Authorities of Oxfordshire.

It is a matter of some regret that collaboration between the Councils is now so limited that the critical growth needs of the County are not being sufficiently addressed as a result.

Improved collaboration is essential for:

- Improved connectivity, with transport needs properly planned for and met. This must include new roads where necessary. The new County transport model needs to be completed as a priority.
-  Reg 19 draft Local Plan proposed Policy Option Set 1. This is an important policy in this regard and other Councils should be consulted on this.
- Ensuring the power needs of planned growth are met, with new energy supplies and grid improvements critical.
- Ensuring sufficient water supply to avoid water stress as the City and County grows.

### D.8 Collaboration to meet Oxford City's Unmet Housing Need

Meeting Oxford unmet housing need should be addressed on a joint basis as it was between 2014 and 2017, to ensure a fair distribution of need is arrived at with consideration of spatial location, taking into account constraints and infrastructure requirements.

Meeting Oxford's unmet housing needs supports the important economic effort of the city and its neighbours. It is disappointing that housing is not always considered in its economic context and its role in supporting the growth of key economic sectors, as the OxLEP LIS and the Advanced Oxford *Oxfordshire's Innovation Engine, 2023* report both recognise.

## D9. Coordination of the County pipeline of business and science park developments

Maintaining the pipeline of new land to support science, technology and innovation across Oxfordshire, also requires the coordination of site release and joint action to secure inward investment and market opportunities as they arise in support of the sectors identified in the OxLEP SEP and the Advanced Oxford *Oxfordshire's Innovation Engine, 2023* report. This needs consideration between the planning authorities to ensure all economic opportunities are realised.

Without this wider collaboration there is a risk that investment opportunities will be lost to other parts of the UK.

#### **D.10 Oxfordshire wide spatial plan**

Completion of the Oxfordshire 2050 Joint Spatial Plan would have provided a good basis for meeting the long-term development needs of the County.

The Regulation 18 part 2 document was a good basis for meeting future economic needs, and, in particular, science needs and new economic locations, as well as housing needs, infrastructure planning and commencing the restoration of our degraded environment. The consultation document contained many powerful proposals for responding positively to the challenge of climate change across the County. The need for such a strategic, County-wide, approach to considering growth remains undiminished.

The completion of an Oxfordshire wide spatial plan would be a critical means to address the unmet housing needs of Oxford on a fair basis, determining the location of new settlements, to avoid the overdevelopment of any one District. It would also provide an effective means to scale up the level of investment in science and technology across Oxfordshire and help ensure the expansion of STEM-based businesses - expansion driven by the increased rate of business formation, and growth of existing businesses - is maintained, and importantly, that these businesses are retained within the County.

Not considering these issues holistically means there is a risk that opportunities are lost, and insufficient provision is made to meet future economic needs.

#### **D.11 Taking advantage of the Ox-Camb Arc**

As noted earlier (D.6) the development of the Ox-Camb Arc is a statement of Government policy so is a factor that Local Plans within the Arc should address.

It is disappointing that little attention has been given to the economic opportunity that the Arc represents by Oxfordshire Councils, in particular how the scale of growth across the Arc should lead to prioritised grid and water supply improvements.

### **E. Specific comments for the Oxford City Regulation 19 Local Plan**

Advanced Oxford would like to see a number of specific proposals taken forward within the Oxford City Reg 19 Local Plan. These are:

### **E.1 Engaging Advanced Oxford**

We would like to see a specific reference added to the Reg 19 Local Plan to reflect the Advanced Oxford strategy when applications for science parks and buildings to be used for science and technology sectors are considered for planning.

As specialists, Advanced Oxford has an important role to play advising the City Council on the specific needs of the science sector.

As the NPPF records (Para 16c), Local Plans should

*'be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'.*

We would welcome the implementation of new mechanisms being put in place to deepen the dialogue with Advanced Oxford and the wider business community on economic and planning matters. The private sector are the investors and risk takers with a deep knowledge of the needs of their businesses and sectors. There is a need for the planners to reach beyond consultation, to engage closely to understand sectors and their needs more comprehensively.

### **E.2 Responding to market signals and capturing inward investment**

We would welcome the Local Plan including a reference to responding proactively to new market signals, to maintaining a pipeline of land release for science, technology and innovation purposes and committing to responding positively to secure new investment opportunities into the city that will help strengthen existing sectors and to establish new clusters in established and emerging science and technology sectors. This may in due course necessitate new land releases to secure this new investment.

The draft Local Plan goes a long way to establishing the right environment for the science and innovation sector to grow, but a proactive role, working in close partnership with Advanced Oxford and others will be essential to retaining university spin outs as they grow, and as local tech companies begin to scale.

### **E.3. Sector analysis in the next Housing and Employment Needs Analysis**

We would welcome the City Council undertaking to ensure that the next time a Housing and Employment Needs Analysis (HENA) Report is commissioned, that it should include more specific economic sector assessments in considering the future economic and housing needs of Oxford City and its neighbouring districts.

#### **E.4. An LDO for Oxford City's science parks**

We would like the City Council to consider preparing and adopting a Local Development Order (LDO) to cover all the science related sites in the City to provide a clear basis for their future growth, and as required, their redevelopment to meet the science and technology needs of the future. This will help streamline the planning process, reduce the need for the current detail of planning applications by setting out what is needed within the LDO.

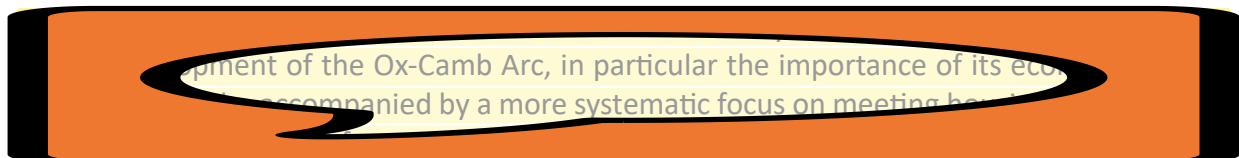
A similar approach has been successfully used to create a stable, long term policy base that provides a high level of planning certainty for encouraging new investment and economic development at Milton Park in the Vale of White Horse District.

#### **E.5. Improved County wide growth collaboration**

As the Advanced Oxford report *Oxfordshire's Innovation Engine, 2023* highlights, improved transport links and other infrastructure are critical for the economic success of Oxfordshire.

A new commitment is needed to pursue cross-County collaboration and coordination between the local planning authorities and the local highways authority to support growth and to ensure that transport and infrastructure meets economic and housing needs where growth is proposed by the Local Planning Authority.

#### **E.6. Referencing the Ox-Camb Arc**



We also urge the 6 Oxfordshire Councils to use the Government's support for the Oxford to Cambridge Arc, to deepen collaboration to cover all aspects of infrastructure, to grow the economy of the Arc and to support housing growth and support new settlements as a means to secure more sustainable planned growth.

The use of Sustainable Urban Extensions (SUEs) tend to overload existing settlements, whereas new settlements enable development to be properly planned from scratch, with all infrastructure and services provided.

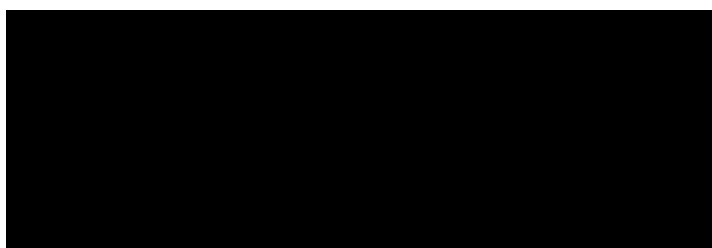
#### **E.7. Review of the Future Oxfordshire Partnership**

Associated with the delivery of, but not for inclusion in the Oxford City Local Plan, we would like to see a review undertaken of the role and functioning of the Future Oxfordshire Partnership, to return to its original purpose to consider growth and associated infrastructure

needs. In addition, through this review, full consideration should be given as to how to secure, for the first time, an effective input from the business sector of Oxfordshire, to revise the public sector partnership so as to become a public – private sector collaboration. The revised partnership should also agree a strategy and workplan for its work, with clear growth outcomes to be secured.

We note that this is likely to become more significant if there is a change of Government in 2024 and a new pro-growth approach is taken nationally and a formal requirement to establish a County-wide spatial strategy is introduced.

Yours faithfully



Sarah Haywood  
**Managing Director**  
**Advanced Oxford**