

Statement of Common Ground between Oxford City Council and

West Oxfordshire District Council

Submission Draft (Regulation 19) Oxford Local Plan 2040

March 2024

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared by Oxford City Council and West Oxfordshire District Council. It documents those matters agreed by the parties with regard to the Oxford Local Plan 2040. It reflects and confirms the current position on matters agreed or not agreed by both parties, with regard to the Duty to Cooperate.

1.2 The area covered by this Statement is Oxford City Council, which is the area covered by the Local Plan 2040. The matters addressed in the Statement are, however, of a cross boundary nature.

1.3 This is one of a number of bilateral SoCGs which have been prepared between Oxford City Council and the other Oxfordshire local authorities as well as with other key stakeholders.

1.4 This bilateral SoCG should be read in conjunction with the joint SoCG which has been signed by all of the Oxfordshire local authorities relating to housing need, housing capacity and unmet housing need.

2.0 Background

2.1 Oxford City and West Oxfordshire District Council have a long history of working effectively together and have been working closely together on a number of matters of strategic cross boundary importance in accordance with the Duty to Cooperate.

2.2 Up until August 2022 the six local authorities in Oxfordshire (Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council) were collaborating on a strategic joint Oxfordshire Plan 2050 with a supporting Oxfordshire-wide evidence base. That process ended and the local planning authorities are each preparing individual local plans and working together via the Duty to Cooperate.

2.3 At a strategic level Oxford City Council and West Oxfordshire District Council are both members of the Future Oxfordshire Partnership (FOP), which has replaced the Oxfordshire Growth Board, and its supporting Executive Officers Group. Various mechanisms for co-operation exist, as set out in Table 1 of the City Council's General Statement of Common Ground.¹

1 [general-statement-of-common-ground-august-2023 \(oxford.gov.uk\)](https://www.oxford.gov.uk/general-statement-of-common-ground-august-2023)

2.4 The purpose of the FOP is to:

- Coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefits;
- Support the development of local planning policy that meets the UK Government's stated aim of net zero carbon by 2050, and contributes towards biodiversity gain whilst embracing the changes needed for a low carbon world; and
- Seek to secure funding in the pursuit of these aims and oversee the delivery of related work programmes delegated to it by the joint committee's constituent local authority members.

2.5 Prior to the establishment of the FOP, the authorities were members of the Oxfordshire Growth Board which was established in 2014.

2.6 At the strategic level, the authorities also collaborate on economic matters through the Oxfordshire Local Enterprise Partnership (OxLEP), which prepares the Strategic Economic Plan.

2.7 Oxford City Council and West Oxfordshire District Council have been working closely together on a number of matters of strategic cross boundary importance.

3.0 Duty to Cooperate

3.1 Oxford City Council considers that it has proactively engaged with West Oxfordshire District Council through the preparation of the Oxford City Local Plan 2040 on a number of cross boundary issues. More information and details of this engagement can be found in Oxford City's Duty to Cooperate Statement (first published September 2021).

3.2 The parties agree that in general terms, Oxford City and West Oxfordshire District Councils have engaged constructively, actively and on an on-going basis to secure effective cooperation on strategic cross boundary matters in relation to the preparation of their respective Plans and throughout the preparation of those Plans.

3.3 West Oxfordshire District Council has however previously expressed concerns regarding the lack of engagement in relation to the preparation of the housing need evidence which underpins the Oxford Local Plan 2040 (see below).

4.0 Oxford City Objectively Assessed Need (OAN)

4.1 Between 2018 and August 2022 the six local authorities in Oxfordshire (Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council) were collaborating on a Joint strategic spatial strategy (the Oxfordshire Plan 2050). To inform this Plan a range of supporting evidence was produced including the Oxfordshire Growth Needs Assessment (OGNA)²

2 [Microsoft Word - Final Oxfordshire Growth Needs Assessment Phase 1 Report 24.06.21](#)

4.2 Following cessation of the Oxfordshire Plan in August 2022, Oxford City Council and Cherwell District Council jointly commissioned a new Housing and Economic Needs Assessment (HENA) which was published as part of Oxford City's Regulation 18 Part 2 consultation in February 2023.

4.3 West Oxfordshire District Council was not involved in the scoping or preparation of the HENA and has expressed a number of methodological and procedural concerns as set out in its Regulation 19 response.

5.0 Housing capacity

5.1 Notwithstanding West Oxfordshire District Council's methodological and procedural concerns relating to the preparation and findings of the HENA, the parties agree that, on the basis of Oxford City's preferred HENA housing need scenario of 1,322 dwellings per annum, that the City Council does not have the capacity to meet this in full in the period 2020 – 2040.

5.2 West Oxfordshire District Council consider that there may be greater capacity than that calculated in the Oxford City HELAA and before committing to taking any additional unmet housing need [above that already agreed in its adopted Local Plan 2031]. West Oxfordshire District would not only want to see the City Council's assumed level of housing need to be substantiated through independent examination but would also wish to explore further whether Oxford City can accommodate all or part of this additional need within its own boundaries through the Duty to Cooperate process.

5.3 West Oxfordshire considers that there may be more opportunities to increase capacity, including, but not limited to, assessing residential capacity of employment sites.

6.0 Unmet housing need

6.1 The parties agree that:

- Oxford City Council's preferred options (Regulation 18 part 1) consultation October 2022 first highlighted that the City Council is unlikely to be able to meet its objectively assessed housing needs within its boundaries.
- The approximate scale of the unmet need was set out in the City's Regulation 18 part 2 (Housing Needs) consultation, February 2023 and has been discussed between the parties throughout 2023, including the particular points of engagement between the parties on the issue as outlined in Appendix 1.
- In December 2023, Oxford City Council made a formal request to all Oxfordshire district councils to meet a proportion of its unmet housing needs.
- West Oxfordshire District has already made provision for 2,750 homes for Oxford's unmet need in its West Oxfordshire Local Plan 2031 (adopted September 2018).
- Whilst its own identified housing needs to 2041 are yet to be fully quantified, West Oxfordshire District Council anticipates that it will be able to meet all of those needs within

its own administrative boundary and will not require Oxford to meet any of those identified housing needs.

7.0 Employment need

7.1 The parties agree that:

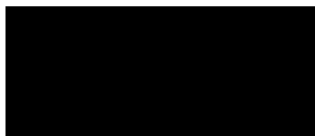
- Oxford City does not require West Oxfordshire District to accommodate any of its employment needs to 2040.
- Whilst its own employment needs to 2041 are yet to be fully quantified, West Oxfordshire District Council does not anticipate requiring the city to accommodate any of its employment needs.

8.0 Other strategic matters

8.1 Matters of detail relating to other duty to cooperate topics have been raised in West Oxfordshire District Council's representation to the Regulation 19 Oxford Local Plan 2040, and these are summarised and responded to in Appendix 2. The position in relation to the duty to cooperate is as follows:

- The parties will continue to work collaboratively with the other Oxfordshire authorities on a Gypsy and Traveller Needs Assessment (GTAA) to inform their respective Local Plans.
- There are no unresolved duty to cooperate issues relating to the *provision of retail, leisure and other commercial development*
- *Provision of infrastructure for transport*: the cumulative impact of growth on the local and wider transport network is a strategic matter and the Councils will work constructively with Oxfordshire County Council, Highways England and other stakeholders to plan for future highway infrastructure improvements and to support the delivery of the Oxfordshire Local Transport Plan. There are no outstanding Duty to Cooperate concerns between the two parties in relation to this issue.
- There are no outstanding Duty to Cooperate concerns between the two parties in relation to the issue of *provision of health infrastructure and local facilities*
- There are no outstanding Duty to Cooperate concerns between the two parties in relation to the issue of *climate change mitigation and adaptation including flood risk*
- *Conservation and enhancement of the natural and historic environment, including landscape*: There are no outstanding duty to cooperate issues regarding this issue between the parties.

Signed on behalf of West Oxfordshire District Council



Planning Policy Manager

Date: 21 March 2024

Signed on behalf of Oxford City Council



David Butler, Head of Planning and Regulatory Services

Date: 26 March 2024

Appendix 1: Key meetings and information sharing regarding HELAA, unmet need and the draft plan

Date	Type of engagement	Topic
27th June 2023	Policy officers	OLP2040 evidence base, draft outputs and direction of travel
19th July	OPPO (Policy managers)	Discuss process for considering unmet need and South and Vale presented their thoughts on the HENA and unmet need approach proposed
2nd August	Sharing of HELAA draft report	Shared draft report 2023, Appendices A,B,C, maps and emailed referred to the draft capacity figure 10,298 2020-2040 (updating the figure from the interim HELAA in the Reg18 part 2 consultation)
11th August	Circulation of note to policy managers	Note on housing need setting out in writing information previously shared at OPPO
5th September	OPPO	
13th September	Workshop	Workshop with policy officers from all Oxfordshire districts and the County to discuss the City Council's approach to its HELAA
5th December	Policy officers	During consultation discussion to help with any points of clarification needed

Appendix 2: Detailed comments and responses

Policy/paras/ section	Summary of West Oxfordshire DC comments	City Council response	Proposed modifications	West Oxfordshire response
Vision	<p>Vision does not articulate in spatial terms how the city is expected to evolve up to 2040. A key diagram would help. the vision does not fully express or address the anticipated role of the city within the County context, particularly the key role it plays in terms of employment opportunities and associated patterns of movement across Oxfordshire.</p> <p>it would be helpful if the vision were to more strongly emphasise the importance of maximising the delivery of new homes within Oxford's administrative boundaries including being more creative around the use of sites and building heights and densities. Could secure positive benefits to heritage as well as protecting it.</p>	<p>We have reviewed the Vision in light of these comments, but consider the reference to equality of access to housing is balanced in terms of detail with other considerations, whereas more detail in terms of building heights and densities is out of balance with the rest of the Vision, which is intentionally very concise. The Vision refers to 'respecting' our heritage, rather than protecting it, which seems to be the right wording.</p>	No change proposed	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.</p>
Policy S1	<p>Could more fully commit to maximising provision of new homes. Protection of amenity may not be needed in a spatial strategy policy. Should more clearly emphasise the importance of enhancing GI networks rather than simply avoiding harm to them.</p>	<p>Criterion f is part of a set of criteria specifically relating to the location of new development, rather than details of how it is carried out. Therefore, whilst we agree with your comment that enhancement is as important as</p>	No change proposed	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.</p>

	Question whether it is necessary to repeat the presumption in favour of sustainable development from the NPPF.	protection, this policy is only referring to locating new development in places that do not damage GI networks. Similarly, it is not focused on maximising delivery of homes (although other policies are), but rather ensuring uses are in appropriate locations (which will be most places in the city except for those that need protecting).		
S2	Statements of intent rather than policy could potentially be moved to supporting text. Perhaps it could more usefully set out key aspects of design checklist at Appendix 1.1	We have reviewed this, but are content with the scope of the policy.	No change proposed.	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.
S3	Policy could potentially be strengthened perhaps by requiring a site-specific IDP for major sites. Some general statements in the policy could be supporting text.	We are not proposing to suggest an amendment to require site-specific IDPs at this stage. Even major development sites in Oxford are often quite small infill developments with limited need for new infrastructure and contributions to CIL are more significant, generally.	No change proposed.	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.

S4	<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. 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>	<p>Paragraph 1.50 does already set out types of circumstances that may lead to viability problems, referring to examples such as land contamination and transport or education infrastructure needs. It is agreed that the statement that developments should generally be assumed to be viable could be stronger. Amendment suggested.</p>	<p>Policy S4 The policies in the Plan <u>have been viability tested and planning applications that fully comply with them should generally be assumed to be viable.</u> should not generally result in a development proposal becoming unviable.</p>	<p>Noted and the proposed wording change is supported.</p>
H1	<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. 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 	<p>It is agreed that more supporting text to Policy H1, explaining the housing need, housing capacity assessment and requirement more fully, would be useful. In addition we will put forward a housing trajectory to be included in the supporting text. The full level of detail set out will not be included, as some of this is very detailed and it is not necessary in supporting text, for example the HENA looked at scenarios, but these do not need to be set out in supporting text, as only one scenario was agreed by</p>	<p>Modifications proposed to add additional text and the housing trajectory to text to support Policy H1, with updated figures in Policy H1 (see proposed modifications beneath this table)</p>	<p>Noted. We would welcome the opportunity to review and comment on this as appropriate through the course of the examination.</p>

	<p>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</p>	<p>Oxford City Council and Cherwell District Council to represent the need, and this is considered to be the need, rather than a 'policy-on' decision.</p>		
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	<p>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 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 cooperate, 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</p>			
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	<p>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 average of 481 units per year will be delivered. The policy should clearly link to a housing trajectory.</p>			
H2	<p>We note with interest the exclusion of First Homes from the policy despite there being a national requirement for such provision. 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. 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>The affordable housing background paper sets out the reasoning for not including First Homes in draft Policy H2.</p>	<p>No change proposed.</p>	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire’s representation and relevant views of others.</p>

E1	<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. 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>	<p>The changing floorspace needs of businesses, both following the pandemic and because of the change in nature of some employment spaces from standard offices to R&D, has all been factored into the needs assessments.</p>	<p>No change proposed.</p>	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.</p>
E2	<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. 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</p>	<p>This part of Policy E2 follows the wording of the current Oxford Local Plan 2036, but it is perhaps unnecessarily restrictive of proposals for B8 uses which are essential to support Category 2 employment sites (as well as Category 1 employment sites). Therefore, a modification is proposed</p>	<p>Planning permission will only be granted for new or expanded warehousing and storage uses if it is within an existing employment site (of any category) and where it can be demonstrated in the planning application that the use is essential to support the operational requirements of a <u>Category 1 and/ or Category 2</u> employment sites.</p>	<p>Noted and the proposed wording change is supported.</p>

	<p>it is to be sustainable. We question whether the policy could be tightened up to make it clearer that where a use meets a Category 1 employment use rather than site (assuming that some sites have a mix of employment categories), this will be supported. 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>			
G3	<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>	<p>On testing the application of the UGF on all of our sites we considered the Natural England suggested thresholds were too difficult to achieve on certain types of sites in Oxford, so set what we found to be an achievable UGF. We don't think we need to explain in supporting text why the thresholds differ from others' thresholds, although we will make sure this is explained in the background paper.</p>	No change proposed	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.</p>
G4	<p>It is somewhat disappointing to see reference to a minimum of 10% BNG rather than something more ambitious.</p>	<p>Oxford has small sites and limited scope for enhancements nearby to many of these sites. Other policies focus on urban greening and protecting green</p>	No change proposed.	<p>Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation</p>

		infrastructure features, which are important to the successful development of sites. At 20% BNG most of the benefits will be outside Oxford and even Oxfordshire. It is therefore not seen as the right approach in Oxford. We do not think that 20% BNG is required for the plan to be sound.		and relevant views of others.
G6	Reference should be made to Conservation Target Areas in G6 and supporting text.	We had considered this, but we feel that they are one thing that has informed our protection of sites in Policy G1. They are referenced in background papers, but not in the policy, as in and of themselves the policy does not apply to them.	No change proposed.	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.
R7	There could usefully be some further clarification in the supporting text to differentiate this policy from that of Policy HD10 on Health Impact Assessment.	Change proposed to text for clarity	Paragraph 5.46 The policy sets out a number of factors which should be considered where they could have a <u>a direct</u> impact on amenity and health.	Noted and the proposed wording change is supported.
HD2	Wording in HD2 says pp 'will be granted', may be stronger as 'will <u>only</u> be granted', as HD6	The opening paragraphs of Policy HD1 and HD2 are positive statements worded in similar ways that are considered to match these positive statements.	No change proposed	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.

D15	Policy would benefit from reference to storage of other wheeled vehicles such as wheelchairs, mobility scooters and eBikes.	This is included in Policy C7. A cross-reference would be helpful.	Add to the end of paragraph 6.61: Bicycle parking standards are set out in Policy C7.	Noted and the proposed wording change is supported.
C1	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. 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.	Avoiding a concentration of single uses seems quite challenging to implement, as there will not be a natural level for most uses, and some uses such as retail are actively wanted to be located in high concentrations in these locations.	Policy C1 In the Local Centres, new Use Class E uses will be permitted <u>as well as residential (except student accommodation)</u> , including: <ul style="list-style-type: none"> • Retail, cafes and restaurants; • Leisure and entertainment and indoor sports uses (e.g. gyms, leisure centres); • Health centres, GPs and clinics • Offices, • Residential (except student accommodation) • Community facilities. 	Noted and the proposed wording change is supported.
C2	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 other classes. As such, some flexibility may be necessary particularly if units remain empty for a lengthy period of time.	We did consider this, but ultimately we feel that so much flexibility is already provided by the new Use Class E that no more is needed in the policy.	No change proposed.	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.

C6	<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>	<p>In response to a representation from the County Council we intend to put forward a change to paragraph 7.21, which does widen the reference to County Council schemes. However, we do not intend to reference things that are not directly relevant to the local plan and which it can have absolutely no influence over, such as on-line ticket purchasing and live information.</p>	<p>Paragraph 7.21: The transport and movement strategy of the Plan is based upon reducing the need to travel, the promotion of active travel and public transport, the support for and implementation of the county council's core schemes2 <u>Important approaches are</u>—reduction in car parking while yet ensuring the retention of appropriate level of disabled and servicing needs including taxi access, the support for car clubs, the support for well-designed electric vehicle charging provision and ensuring suitable levels of bicycle parking are provided in new development. During the Plan period it is anticipated that trial traffic filters will be introduced. These are predicted to have a transformational impact on congestion-reduction...</p> <p>Paragraph 7.40:</p>	<p>Noted and the proposed wording change is supported.</p>
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			<p><u>Transport Assessments will be considered in the context of the County Council's Local Transport and Connectivity Plan (LTCP) and supporting strategies including the Central Oxfordshire Travel Plan, Active Travel Strategy, Innovation Framework and Mobility Hub Strategy. Particular attention should be given to the Mobility Hub Strategy on proposals at</u> <u>Consideration should be given to the County Council's Mobility Hub Strategy where appropriate in new development proposals. These requirements will be expected to relate to railway stations and bus stations, town and district c</u></p>	
C7	<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. Given the above, we would suggest that</p>	<p>A main modification is proposed to Policy C7, in discussion with Oxfordshire County Council, to refer to the County Council's parking standards for bicycle parking,</p>	<p>Main modification proposed to cycle parking standards.</p>	<p>Noted and the proposed wording change is supported.</p>

	the bicycle parking standards for student accommodation should be tightened up by removing the 'or' from the two criteria. 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. 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.	instead of the local plan appendix.		
C8	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. 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). Also there is very little reference to how future technological development could shape parking.	The policy sets parking standards; it is not considered to be unnecessarily prescriptive. There is some reference to design in the policy in terms of integrating into the landscaping and minimising circulation around the site. Policy C9 is about electric vehicle charging.	No change proposed.	Noted. This will be a matter for the Inspector to consider in light of West Oxfordshire's representation and relevant views of others.

Housing need and requirement

2.3 Housing need must be established and confirmed through the evidence base, and then planned for. ~~We cannot meet all the city's housing need within Oxford, so the calculated need is different to the housing requirement in the Plan (the requirement is also~~

~~sometimes referred to as the housing target). This was also the situation in the Oxford Local Plan 2036, and work was undertaken with the neighbouring districts to include allocations in their adopted local plans to accommodate Oxford's unmet need).~~

2.4 The Local Plan must set out a total housing requirement for the plan period to 2040, setting out the number of houses that are required to be delivered each year. The Government checks delivery of housing in each planning authority in the Housing Delivery Test and there are sanctions if the requirement is not met. Local Plans should seek to meet identified needs, and in establishing a housing requirement figure should show the extent to which their identified housing need can be met over the plan period.

2.45 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. However, simply taking the standard method number would not tackle the fundamental issue of Oxford's urgent need for more homes. Oxfordshire's economic dynamism and its economic growth performance, and particularly the role of Oxford in the regional and national economy, are particular drivers of housing need, and an alternative approach to assessing housing need has been explored which reflects these exceptional circumstances and their impact on current and future demographic trends and market signals. If the Plan sought to deliver lower levels of housing (such as calculated using the Standard Method) then it would be likely to result in more in-commuting and worse affordability of homes, in addition to constraining economic growth, not only in Oxford but with implications for the regional and national economy as well.

2.56 We cannot meet all the city's housing need within Oxford, so the calculated need is different to the housing requirement in the Plan. To help address the housing need, we have also been seeking to maximise capacity in the city through our approach in the Housing and Economic Land Availability Assessment (HELAA – see HELAA methodology for more details) and site allocations policies which prioritise residential development over other uses. More widely in the Council there are further measures to help address the issue of housing need and affordability, including setting up a housing company (OxPlace) to build more homes, and an ambitious programme of delivering Social Rented homes directly by the Council as a registered provider. This is complemented by the innovative policy on Employer-Linked Housing which supports specific major employers in Oxford to deliver affordable housing on their own sites to help address the housing needs of their own employees.

2.6 This was also the situation in the Oxford Local Plan 2036, and work was undertaken with the neighbouring districts to include allocations in their adopted local plans to accommodate Oxford's unmet need).

In 2016 the Oxfordshire Growth Board confirmed that Oxford was unable to meet its proportion of the Oxfordshire Strategic Housing Market Assessment housing need figures to 2031 (later recalculated for Oxford to 2036), due to the constrained nature of Oxford. Based upon extensive evidence, the Oxfordshire Growth Board agreed an apportionment of Oxford's unmet need to be provided within each of the districts. The extant Local Plans for the other Oxfordshire districts are delivering 14,300 dwellings to meet Oxford's previously identified unmet need, as follows:

- Cherwell Local Plan Partial Review: 4,400
- South Oxfordshire Local Plan 2033 4,950
- Vale of White Horse Local Plan Part 2 2,200
- West Oxfordshire Local Plan 2,750

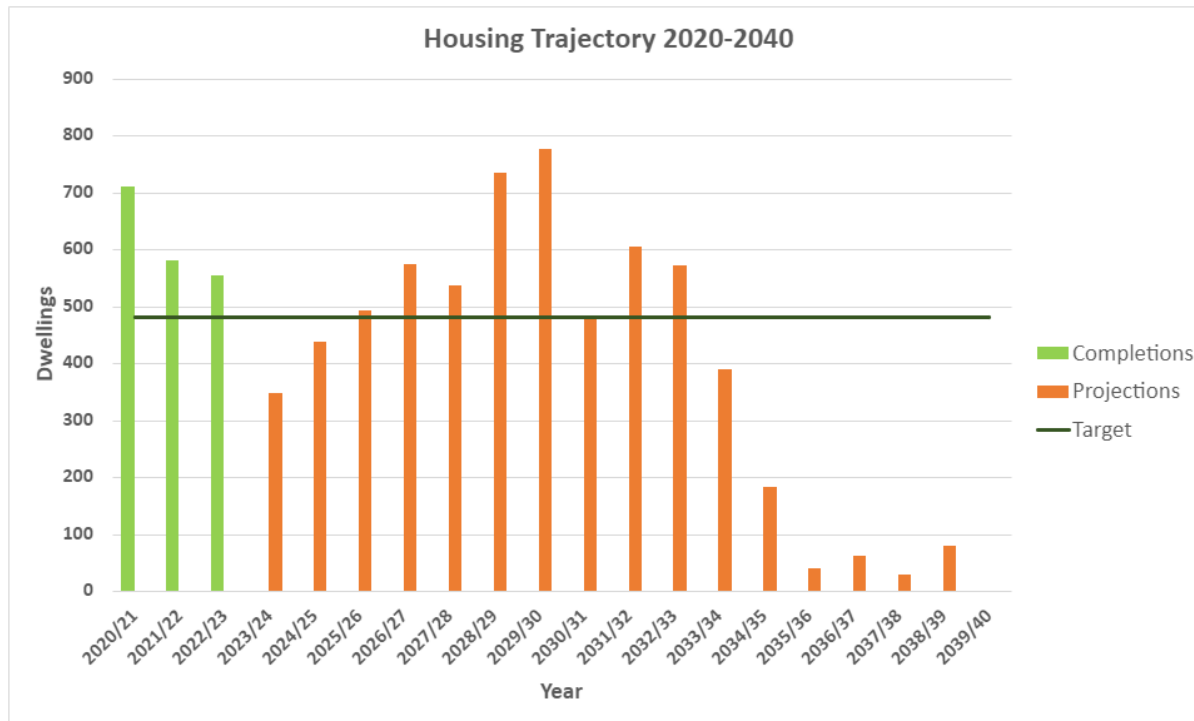
Housing requirement

2.7 The Housing and Employment Needs Assessment ('HENA'), jointly commissioned with Cherwell District Council, objectively assessed the housing need for Oxford.

2.8 The housing need in Oxford is for 26,440 new dwellings 2020-2040, or 1,322 new dwellings per annum. This need is greater than the capacity of the city to deliver it. The assessment of capacity (set out in the Housing and Economic Land Availability Assessment 2023) is 9,851,612-homes over the plan period, or 493,814 dwellings per annum. This means there is 16,589 unmet need for new dwellings within Oxford. Unmet need of 14,300 was previously apportioned across the other Oxfordshire district councils to meet the unmet need from the Oxford Local Plan 2036, and this will be delivered in the 2020-2040 plan period. This represents most of Oxford's unmet need over the 2020-2040 period. Discussions about the remaining unmet need will continue through the Future Oxfordshire Partnership and other forums for discussion.

2.9 Delivery of housing is a priority, and the Local Plan's strategy is to maximise housing delivery while balancing protection of other important land uses.

Diagram: Housing Trajectory 2020-2040



Policy H1: Housing Requirement Provision will be made for at least 9,851~~612~~ new homes to be built in Oxford over the plan period 2020-2040 (average of 493~~81~~ per annum).

