

24 May 2024
L 240523 DJ - Final Hearing Statement_Colleges Group



Planning Policy Team
Oxford City Council
Via email

David Jackson



Dear Sir/Madam,

**Oxford Local Plan 2040: Initial Examination Hearings (June 2024)
Response to MIQs on behalf of Oxford University & Colleges Group**

Savills is instructed as advisor to the Oxford University & Colleges Group, which comprises the University of Oxford as well as Brasenose, Christ Church, Exeter, Lincoln, Magdalen, Merton, New and St John's Colleges (the University & Colleges). The Group has engaged with the Oxfordshire Local Authorities on a range of issues relating to the housing and employment needs of Oxford and how these can be met in the most sustainable way both within the City boundary and the adjoining authorities.

The Group are grateful for the opportunity to respond to the Inspectors Initial Matters, Issues and Questions (MIQs). Whilst these representations are submitted on behalf of the Group collectively, separate representations may be made by group members on more detailed and site-specific matters.

Matter 1 – Procedural/legal requirements

Question 17 concerns proposed policies which seek to mitigate and adapt to climate change in the emerging plan. Draft Policy R1 – Net Zero Building in Operation requires that buildings, in the first instance, provide on-site renewable energy to meet the energy needs of the building. The Group support the ambition of the City Council for Net Zero Buildings. However, the requirement for a building's energy needs to be met by on-site renewable energy is not workable and is at odds with the Written Ministerial Statement of 13th December 2023¹.

Matter 3 – Housing Need and the Housing Requirement

Unmet need

The City Council has identified a level of growth which is ambitious and realistic, according to the findings of the HENA. Of fundamental importance is the fact that a significant part of the Oxford's future housing need cannot be taken up by the City and a significant proportion will need to be met in the adjoining authorities. For example, the City's housing target of 481 dwellings per year represents less than a third of the need identified in the HENA i.e. 1322 dwellings per year. This will mean that a proportion of the remaining 841, which is not already being met will need to be taken up by neighbouring authorities.

The extent to which the housing requirement will be met within sites allocated in the adjoining authorities is identified in Figure 8.2 of the LP40, titled 'Allocated unmet need sites outside of Oxford boundary'. The explanatory text in paragraphs 8.6-8.8 describes this relationship insofar as it exists in the adopted local plans of the collective Oxfordshire authorities i.e. up to 2036. However, there is no explanation provided in the LP40 as to how the housing needs arising in the period beyond this date are to be addressed. It is not clear that the

¹ 'Planning – Local Energy and Efficiency Standards Update', Statement made on 13 December 2023, Statement UIN HCWS123.



City Council has fully communicated the needs to adjacent authorities and it is clear that no agreement has been put in place to take up this additional unmet need.

Calculating need

The new NPPF (published December 2023) contains guidance on the types of justification that are required in order to explore alternative methods to the standard method for determining housing levels in emerging local plans. One example given is on the demographics of a place and how extreme concentrations of particular age groups can impact the needs of the population. In Oxford around 35,000 of the population are students enrolled in full-time courses, the majority of which are in the age group 19-29 and make up around 26.5% of the population (at the time of the 2021 census). This group is therefore significantly over represented in the demographics of the City and whilst student housing caters for around half of these numbers, the other half or around 17,000 people, live in shared housing and single occupancy flats in the City. This puts considerable strain on family housing in parts of the City, with over 10k students in house shares².

There is a case for the City area to be considered as having exceptional circumstances in assessing the housing need in ways other than the standard method. The HENA does just this and it tries to balance the residential needs of the City with the economic growth of what is the City with the UKs highest concentration of University spinouts³.

Question 6 of the MIQs concerns the capacity within Oxford and the resultant housing requirement and comprises of a series of questions:

- *How has the capacity to accommodate housing within Oxford City been assessed?*
- *Has the process been sufficiently thorough and robust?*
- *Could the capacity estimate be increased by altering assumptions or policy approaches?*
- *If so, what effect would this have?*

The Group consider that it is fundamental that the housing need identified through the HENA should be met in full. It is recognised that the City is constrained in terms of available land for development and that without a Green Belt review it has only a finite capacity. However, the densities and building heights for new development should not be constrained by blanket restrictions, as appropriate, being mindful of the December 2023 NPPF requirement to avoid “*uncharacteristically dense*” forms of development.

There is no evidence in the Statements of Common Ground with neighbouring authorities that the City Council has sought to address the unmet need by suggesting an increase in the density of those sites allocated in neighbouring local authority areas that are adjacent to the City boundary and are contributing to the unmet needs of the City.

Alternative options to address this identified need should be carefully considered. Statements of Common Ground with neighbouring authorities include alternative options such as the allocation of employment sites for housing to address the housing need, however, the Group do not agree with this approach. There needs to be a balance between economic growth and jobs provision alongside proposed new housing in the City given the importance of the City to Oxfordshire’s economy. The close proximity of employment sites to the University is of utmost importance in leveraging the talent and entrepreneurship of the student body. The City is an economic dynamo that is of regional and indeed national importance. It is vital that sufficient land supply is created to allow for this ongoing expansion of the local economy in all of its forms; offices, laboratory spaces, industrial, logistics and manufacturing.

To ensure the continued importance and vitality of Oxford the balance of the identified need should be met by the neighbouring authorities either within existing allocations or identified on new allocations in the emerging

² <https://www.oxford.gov.uk/population-statistics/student-statistics> & <https://www.oxford.gov.uk/population-statistics/oxfords-population>

³ ‘*The Investment Plan; Oxfordshire’s Local Industrial Strategy*’, HM Government and OxLEP, August 2020.



local plans of the Oxfordshire Districts. The objectives expressed in the Spatial Strategy for Oxford should be extended across the whole urban area of the City, including those in adjoining authorities, to ensure a consistent approach to achieving improved prosperity, health, wellbeing, and environmental quality.

The Group do not wish to participate in the hearing sessions for Matters 1-3 but will reserve its right to do so for further Matters once details are announced.

We trust that the above comments are useful and assist the preparation of the new Local Plan. However, if you have any comments in relation to the above please do contact us.

Yours sincerely,



David Jackson MA MRTPI
Director

cc: University & College Group members