

Oxford Local Plan 2040

Hearing Statement Matter 3 Days 2 & 3 – 12 and 13 June 2024

Statement Prepared by:

Savills (UK) Ltd.

For:

Thomas White Oxford Ltd and Oxford North Ventures Ltd



Introduction

This hearing statement has been prepared by Savills (UK) Ltd. on behalf of the Thomas White Oxford Ltd (TWO) and Oxford North Ventures Ltd (ONV) landowner and developer of the Oxford North site.

The Inspectors have issued a schedule of Matters, Issues and Questions for the Part 1 Hearing sessions to be held in June 2024. This statement provides a response to the matters and issues set out for Matter 3 – Housing Need and the housing requirement.

The information contained within the statement is in addition to the Regulation 19 representations that were submitted on behalf of TWO and ONV in January 2024. At that time the representations were submitted separately, but for this Matter the parties will rely on the joint statement. This may not be the case for subsequent matters.

Matter 3 – Housing Need and the Housing Requirement –

- 1.1 The papers provided by the Inspectors set out a series of questions for consideration at the Examination Hearing. A total of 14 questions are posed for consideration. The majority of the questions in Matter 3 are for the Council to address. However, TWO and ONV would like to make brief comments in relation to Question 6 – Capacity within Oxford City and the resultant housing requirement.

Question 6 – Capacity within Oxford City and the Resultant Housing Requirement

- 1.2 This question is highly relevant to TWO and ONV's proposals at Oxford North and the wider implications of changing the policy approach as currently drafted in the Local Plan. The question raises a number of individual points, namely:
 - 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?
- 1.3 Prior to responding to these questions TWO and ONV would stress the importance of ensuring that the Housing Need identified in the HENA is addressed in full either within the City or the surrounding Districts. Failure to meet the need will have a long term impact on the wider Oxfordshire economy, force house prices higher and increase commuting distances to the detriment of the Oxfordshire environment and economy. Oxford plays a key role in the local

economy and one which must be nurtured to flourish. This plays a key role for the wider Oxfordshire market.

- 1.4 If Oxford City struggles (in terms of housing provision and indeed employment) then this will have direct knock on consequences to the surrounding Districts.
- 1.5 The City is a physically constrained area with a finite capacity for development with topographical, flooding and Green Belt restrictions. It is also constrained by the high number of heritage assets, one of them being the historic views into and out of the City which constrains the height of development from key viewpoints.
- 1.6 These circumstances will result in successive iterations of Local Plans finding it increasingly hard to meet housing needs within the City. For the benefit of the whole of Oxfordshire a joined up coordinated approach is needed to addressing this issue. This was proposed via the Oxfordshire Plan 2050 Spatial Strategy before it was discarded by politicians.
- 1.7 Our view is that the City Council has taken a robust stance to assessing the capacity of the City to accommodate housing, whilst at the same time balancing this against the need to retain and enhance employment, leisure and retail uses as well as the character and appearance of Oxford.
- 1.8 In theory policies could be amended to encourage more housing for example by allowing taller buildings, stepping away from Nationally Described Space Standards and building on employment sites to name a few. However, the knock on consequences of this sort of approach would be highly detrimental to the local economy, the local environment and what makes Oxford the place it is.
- 1.9 If the Inspectors feel this is an approach that warrants further investigation our Clients would be keen to partake in a hearing session on this topic and would reserve comment until the detail and scope of approach is known. To best inform such a session detailed analysis will be needed probably in the form of proposed Main Modifications and the pros and cons of each can be properly assessed.
- 1.10 Statements of Common Ground with neighbouring authorities note that alternative options could include the allocation of employment sites for housing to address the need, this approach is strongly objected to.
- 1.11 The City Council has sought to introduce flexibility in the Local Plan by allowing residential to come forward where the local environment allows it. Given that much of the City is developed land, the City can-not force a change of use. Reducing the percentage of affordable housing can act as a catalyst to boost the supply of housing but the Local Plan should not push against market forces. In addition, a Category 1 employment site, such as Oxford North, is defined in the Local Plan as "nationally and regionally important to the knowledge economy or are significant

employers or sections usually within Class E(g) and B2 with some B8 uses relation to their function...” To allow residential development on such employment sites is counter-intuitive and will be to the detriment of the national and regional economy including those in surrounding Districts. This will be discussed further in the specific hearing session on Employment in the Part 2 session.

- 1.12 TWO and ONV consider that the City Council has set out a sensible and rational approach to meeting the identified housing need and has explored all feasible opportunities as well as introducing flexibility to allow for ad-hoc sites to come forward. Indeed, redevelopment options may come forward through the Plan Period that allow for housing to be delivered as windfalls opportunities. However, an element of housing will remain un-allocated.
- 1.13 This shortfall must be accommodated in the local Oxfordshire area where unconstrained land exists. Given the relatively low level of un-met need, it could, in part, be achieved by increasing density of existing allocated sites (for example a planning application for site PR6a, off Oxford Road, in the Cherwell District Council Partial Review plan is proposing 800 dwellings on a site allocated for 690).
- 1.14 TWO and ONV encourage ongoing cooperation between the City and neighbouring authorities to reach agreement over this shared issue. The Inspectors are encouraged to set out a clear stance on this point given its strategic importance to the whole of Oxfordshire. The City Council must avoid resorting to the allocation of Category 1 employment sites for housing rather than employment uses due to the impact this would have on the Oxfordshire, regional and national economy.