

# Oxford Local Plan 2040

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

Statement Prepared by:

Savills (UK) Ltd.

On Behalf of:

Christ Church



## **Introduction**

This hearing statement has been prepared by Savills (UK) Ltd. on behalf of Christ Church (ChCh).

ChCh is one of the largest Colleges in the University of Oxford as well as a major landowner in and around the City. Its property portfolio includes a full spectrum of buildings ranging from high quality listed buildings (including Christ Church Cathedral) through to modern buildings. It also has retail, residential and commercial interests in the City as well as being an important tourist destination. It looks after the Christ Church Meadows, registered Park and Garden of Historic Interest, which are also important to biodiversity and the setting of Oxford. ChCh also runs an independent day school for pupils aged 3-13 – the Christ Church Cathedral School.

Its interests are therefore wide ranging covering the College, Cathedral and Cathedral School.

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 by ChCh in January 2024. ChCh has confirmed that it does not wish to appear in person in these preliminary hearing sessions but reserves its right to do so for subsequent matters. For matter 3 – question 6 – it is assumed that the discussion around this point will be high level and theoretical in nature. If the discussion gets in to detail, then ChCh may wish to partake in any discussion that may affect its land holdings and aspirations.

### **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, ChCh 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 very short, but the answers could be wide ranging. Albeit it is assumed that any wider debate will be the subject of discussions at a subsequent hearing session. The implications of a change in policy direction could have significant implications for ChCh. The Inspectors' question refers to a number of individual points, namely:

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- *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 ChCh would stress the importance of ensuring that the Housing Need identified in the HENA is addressed in full across the City and 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 employment) then this will have direct knock on consequences to the surrounding Districts.
- 1.5 The City is physically constrained 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. ChCh is well aware of these constraints given the extent of its historic estate.
- 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 the issue of housing need. 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, education 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 An alternative is to incentivise housing by significantly reducing the level of affordable housing or increasing the threshold when it takes effect, especially on brownfield sites. This may encourage windfall sites to come forward. However, it is not possible for the City Council to identify the level of housing that could come forward as a result.

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- 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 and the resistance to accommodating housing across their districts is strongly objected to.
- 1.11 The City Council has sought to introduce flexibility in the Local Plan by allowing residential development to come forward where the local environment allows it. Given that much of the City is developed land, the City cannot force a change of use. A Category 2 employment site, such as the Chiltern Business Centre (which is owned by ChCh), is defined in the Local Plan as “providing important local services and make a valuable employment contribution and often provide important supporting infrastructure for the larger employment uses in Oxford.”
- 1.12 To allow residential development on such employment sites is counter-intuitive and will be to the detriment of the local economy and wider Oxfordshire region. This will be discussed further in the specific hearing session on Employment in the Part 2 sessions.
- 1.13 ChCh considers that the City Council has set out a sensible and rational approach to meeting the identified housing need and has explored 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, for example at the Faculty of Music. However, an element of housing need will remain un-allocated.
- 1.14 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 there are at least two current planning applications that are seeking more units than their respective allocations, firstly, site PR6a, off Oxford Road, in the Cherwell District Council Partial Review plan is proposing 800 dwellings on a site allocated for 690 and, secondly, Land off Bayswater Brook in South Oxfordshire is proposing 1,570 dwellings on the site that is allocated in the South Oxfordshire Local Plan for 1,100 dwellings) or by extending such allocations onto adjoining land. This would result in a highly sustainable form of development in locations judged by Inspectors in previous Local Plan examinations to be appropriate locations for growth.
- 1.15 ChCh encourages positive and productive cooperation between the City and neighbouring authorities to reach agreement over this shared issue for the benefit of the whole of Oxfordshire. 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 and 2 employment sites for housing rather than employment uses due to the impact this would have on the Oxfordshire, regional and national economy. Unconstrained land exists on the edge of, but outside, Oxford City that can accommodate the level of unmet housing need identified.