

**To:** City Executive Board  
**Date:** 16 October 2018  
**Report of:** Head of Planning, Sustainable Development and Regulatory Services  
**Title of Report:** Proposed Submission Draft Oxford Local Plan 2036

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	Council is requested to approve the Oxford Local Plan 2036 Proposed Submission Document for public consultation and, subject to the outcome of the consultation, if no matters are raised that materially impact upon the Plan strategy, submit the Submission Draft Oxford Local Plan to the Secretary of State for formal examination.
<b>Key decision:</b>	Yes
<b>Executive Board Member:</b>	Councillor Alex Hollingsworth, Board Member for Planning and Regulatory Services
<b>Corporate Priority:</b>	A Vibrant and Sustainable Economy; Meeting Housing Needs; Strong and Active Communities; A Clean and Green Oxford.
<b>Policy Framework:</b>	Development Plan Document.
<b>Recommendations: That the City Executive Board resolves to:</b>	
<ol style="list-style-type: none"> <li>1. <b>Recommend</b> Council approves the Oxford Local Plan 2036 Proposed Submission Document for public consultation;</li> <li>2. <b>Recommend</b> Council approves all the supporting statutory documentation that includes the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP), Equalities Impact Assessment, and Options Consultation Report;</li> <li>3. <b>Authorise</b> the Head of Planning, Sustainable Development and Regulatory Services (or any officer acting in that capacity), after consultation with the Executive Board Member, to make any necessary editorial corrections to the document, IDP, Sustainability Appraisal and Habitats Regulation Assessment, and to agree the final publication style draft version before publication;</li> <li>4. <b>Approve</b> the Oxford Local Plan 2036 Proposed Submission Document as a material consideration in determining planning applications;</li> <li>5. <b>Authorise</b> the Head of Planning, Sustainable Development and Regulatory Services (or any officer acting in that capacity), after</li> </ol>	

publication and after consultation with the Executive Board Member, to make any minor changes to the document deemed necessary as a result of the consultation, and then to formally submit the Oxford Local Plan 2036 to the Secretary of State for examination.

### **Appendices**

Appendix 1	Proposed Submission Draft Local Plan 2036
Appendix 2	<ul style="list-style-type: none"> <li>i. Sustainability Appraisal</li> <li>ii. Habitat Regulations Assessment</li> <li>iii. Infrastructure Development Plan</li> <li>iv. Consultation Statement</li> </ul>
Appendix 3	Risk Assessment
Appendix 4	Equalities Impact Assessment

### **Introduction and background**

1. The purpose of this report is to seek approval for the Proposed Submission Draft Oxford Local Plan 2036 (Appendix 1) for consultation. The Proposed Submission Draft Oxford Local Plan 2036 has been prepared for the final consultation stage that will take place before the Plan is submitted to the Secretary of State for examination. From 1<sup>st</sup> November to 13<sup>th</sup> December it is intended that a consultation will be undertaken that will meet the requirements set out in Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Plan is supported by a number of other documents contained in Appendix 2.
2. Previous consultations took place in summer 2016 and summer 2017. The purpose of these two consultations was firstly to understand the issues identified by the public which they thought the Plan should cover and then in 2017 to get views on a range of options for policies, called 'preferred options'. These consultations informed the development of the draft policies in the Proposed Submission Draft. This autumn's consultation will ask for views on whether the Plan meets the tests of soundness set out in paragraph 35 of the NPPF. The Proposed Submission Draft Plan is intended to proceed straight to submission to the Secretary of State unless anything material arises from the consultation, although minor changes that would not constitute 'main modifications' may be made prior to submission. Comments received in response to this Regulation 19 consultation are submitted alongside the Plan to be considered by the Inspector as part of the examination of the Plan.

### **The Draft Local Plan**

3. The Draft Submission Local Plan offers a range of policies with supporting text. These range from strategic policies to more detailed policies to be used in development management decisions. The Plan is

comprehensive and will replace the Local Plan 2001-2016, the Core Strategy and the Sites and Housing Plan. The Northern Gateway AAP, Barton AAP, the JSSP once it is adopted (expected to be in 2021) and any adopted Neighbourhood Plans will be the only other documents containing statutory planning policies. The sections below summarise briefly the key points from each chapter of the Plan.

#### *Introduction, vision and strategy*

4. Various sources of data and background information have been used to describe Oxford's strengths and role and the challenges it faces over the next 20 years, which have fed into the vision (alongside Vision 2050) and informed the strategy. The vision is summarised as:
  - A centre for learning, knowledge and innovation;
  - A prosperous city with opportunities for all;
  - An environmentally aware city;
  - An enjoyable city to live in and visit;
  - A strong community;
  - A healthy place.

#### *Building on Oxford's Economic Strengths*

5. Chapter 2 of the Draft Local Plan contains policies to protect key economic sites and promote employment uses that support Oxford's strengths. The Plan's strategy is to support Oxford's role as a fast-growing city, supporting and generating economic growth for the local and national economy. The Employment Land Assessment (ELA) (2018, GL Hearn) looked at demand for new employment space. The Oxford Employment Land Assessment 2018 found that demand for employment land is in excess of current supply. Existing sites have also been reviewed for their current performance and their ability to meet requirements in future. Sites have been categorised as 1, 2 and 3. Category 1 and 2 sites are protected. Category 3 sites are also protected but other uses could be allowed if the criteria set out in draft policy E1 is met. The strategy of the Plan is to prioritise more job intensive uses within the city, and those which need to be in Oxford. To this end, draft policy E1 also allows the loss of B8 warehousing sites where it is not essential that they're located in Oxford and they are not essential to supporting a key category 1 site.

#### *Delivering Housing*

6. There is a huge and urgent need for new homes in Oxford, but also a constrained supply. The main evidence about housing need in Oxford is the Oxfordshire Strategic Housing Market Assessment (SHMA) 2031 that was commissioned by the six Oxfordshire local authorities, and which has been rolled forward for Oxford to 2036. The Housing and Economic Land Availability Assessment has been updated. This assesses capacity to deliver new housing and new economic development. A very extensive and thorough assessment of sites was carried out, and capacity has been calculated based on the draft policies of the Plan, assuming high

densities will be delivered in all suitable locations. This has shown that the capacity of housing land to meet all current housing needs in the city is below the identified housing need, and therefore a capacity-based housing target has been set in Policy H1. This is considered to be an appropriate strategy under the circumstances.

7. Oxford's very high need for new housing means that general market house prices are expensive for both buying and renting. Difficulties accessing housing can mean that employers can struggle to find and keep staff, affecting the desirability of locating in Oxford and making it more difficult to run important services such as schools and hospitals. Policy H2 ensures the delivery of affordable housing, prioritising social rented housing as the most affordable option in Oxford. Policy H3 also enables key employers important to Oxford (for example the NHS and the universities) to provide affordable accommodation entirely for their staff.
8. The Plan's strategy is to limit the number of university students living outside of university-provided accommodation, whilst also restricting new accommodation to suitable areas, which are existing campus sites (and areas adjacent to them) and the city and district centres. Because of the limited number of sites, the importance of the universities to the economy and the desirability of their students living in university accommodation, occupation of new student accommodation is restricted to students at the universities by draft Policy H8.

*Making wise use of our resources and securing a good quality local environment*

9. This section of the Proposed Submission Draft Local Plan contains policies ensuring sustainable design and construction and limiting carbon emissions resulting from new developments. Policy RE1 sets out requirements for sustainable building that would result in qualifying residential developments in Oxford emitting 40% less carbon dioxide emissions (associated with regulated energy consumption) than a building meeting minimum standards required by Building Regulations. The policy would deliver this by allowing a flexible combination of renewable energy, low carbon technologies and energy efficiency measures.
10. Chapter 4 also contains policies ensuring efficient use of land. Related to this is policy RE3 concerning flood risk. This policy is designed to ensure that new development does not act to increase flood risk elsewhere, and to ensure the safety of occupants in the event of a flood event. When stringent conditions are met it allows for redevelopment of brownfield sites in high risk flood zones, where it will lead to improvements in flood risk management and because these sites are often otherwise the most sustainable locations for development. Chapter 4 also includes policies to ensure a good quality local environment, in particular strong requirements in terms of air quality, as set out in RE6.

### *Protecting and enhancing green and blue infrastructure network*

11. The draft policies in Chapter 5 aim to protect Oxford's green and blue infrastructure network. The aim of the policies in the section is to ensure green spaces are as high-quality and as multi-functional as possible, with public access particularly valued, as well as ensuring a network of green spaces with connecting wildlife corridors and green accessible routes.

### *Design and Heritage*

12. Oxford's long history is reflected in outstanding buildings and features. It is important to deliver new development in a way that respects and compliments this rich history. Policy DH1 links to an appendix setting out the details of what is expected in terms of design. Policy DH2 relates to high buildings. The intention is to continue to define view cones and a high buildings area but to include criteria to allow a more nuanced consideration of the impacts of building height. .

### *Movement*

Development that attracts a lot of people will be focused on transport hubs in the city centre and elsewhere to make walking, cycling and public transport options more attractive and viable. Preferred options designed to reduce carbon emissions and promote sustainable modes of travel include:

Providing infrastructure to support low emission vehicles and sustainable modes of travel, such as bike parking.

### *13. Retail*

14. In recognition of the changing face of retail, the policies of Chapter 8 introduce some flexibility in the amounts and types of units suitable in shopping frontages. This flexibility has been introduced by reducing the area of primary retail frontages and also by lowering the threshold % of A1 uses that are required before a change of use to other uses is acceptable (see policies V1 and V3). The % threshold is set below current levels but also at a level which will maintain vibrancy of the shopping streets and which will protect the needed amount of retail, as assessed by the Oxford Retail and Leisure Study 2017. This chapter also contains policies to allow hotels only in suitable locations and to protect pubs and community facilities.

### *Sites*

15. Chapter 9 contains site allocation policies. This includes 7 sites which it is proposed are removed from the Green Belt. A Green Belt Study was undertaken by LUC for the Council using the same method and assumptions as the joint Oxfordshire wide assessment of the Green Belt, to ensure a consistent assessment of sites inside and outside of Oxford. The aim of the study was to assess the impact of potential development of those sites on the integrity of the remaining Green Belt. Sites which are otherwise suitable for development and which have a low to moderate impact on the purposes of the Oxford Green Belt are proposed for

removal from the Green Belt. The exceptional circumstances case is set out in the Green Belt background paper. These sites are:

- The site opposite Redbridge Park and Ride;
- 2 sites on the western edge of Marston and 1 on the eastern side (Marston Paddock)
- A small area next to St Catherine's College;
- Two sites to the north of the city adjoining potential development sites in Cherwell District Council's area (St Frideswide Farm and adjoining Northern Gateway)

### **Sustainability Appraisal and HRA**

16. A Sustainability Appraisal has been carried out to assess the options against the Sustainability objectives. This work has informed the selection of preferred options and the drafting of policies. A Habitats Regulation Assessment (HRA) appropriate assessment has been carried out to assess any potential negative impacts of development on the Oxford Meadows Special Area of Conservation (SAC), and suggested mitigations are included in relevant site allocation policies. The Sustainability Appraisal and HRA will be published alongside the Proposed Submission Draft Local Plan and will also be available for consultation.

### **Infrastructure Development Plan**

#### **Consultation**

17. The consultation responses and engagement are an important input in forming the Local Plan. The Consultation and Engagement Programme was considered at CEB on 21<sup>st</sup> January 2016 at the same time as the Local Development Scheme, which set the programme for production of the Local Plan. Engagement and consultation will also be consistent with the Statement of Community Involvement in Planning, and appropriate to the stage.

18. Consultation has closely followed the Consultation and Engagement Programme. During June, July and August 2016 the First Steps consultation took place to get early input into the Plan. That was not a statutorily required consultation but followed best practice, and the results of that consultation informed the content of the Preferred Options Document. The Preferred Options document was consulted on in summer 2017. Responses to that consultation informed the drafting of policies in the Proposed Submission Draft Oxford Local Plan 2036.

19. Consultation at the Regulation 19 stage is more formal. The aim of the consultation stage is to ask for views on whether the Plan meets the tests of soundness set out in paragraph 35 of the NPPF. Comments received at this stage of consultation are sent to the Secretary of State on submission of the Plan for consideration by the Inspector as part of the examination. There is limited scope to make changes to the Plan based on comments received, prior to submission.

### **Financial implications**

20. The costs associated with the production of the Local Plan, including the consultation, are being met through the Local Plan budget and resources of the Planning Policy team.

### **Legal issues**

21. There are no specific legal implications arising from the recommendations set out in this report. There are legal requirements that must be followed through the production of the Local Plan, which will be considered by the Inspector at examination.

22. The Local Plan is a statutory document the Council must produce. The draft submission document is prepared for the 3<sup>rd</sup> round of consultation, which will follow procedure set out in Regulation 19. This is a more formal consultation than previous rounds. Comments should relate to the 'soundness' of the Plan and are considered as part of the examination.

### **Level of risk**

23. The completed Risk Register is attached as Appendix 3.

### **Equalities impact**

24. A two-stage approach to the Equality Impact Assessments (EqIA) has been followed for the Local Plan. The first phase comprised of an initial assessment of the policy areas within the Preferred Options Document. The second phase has looked at the policies as drafted in the Proposed Submission Draft Local Plan (attached as Appendix 4). Consultation on the EqIA will be combined with the consultation beginning on 1<sup>st</sup> November.

<b>Report author</b>	Sarah Harrison
Job title	Team Leader, Planning Policy
Service area or department	Planning, Sustainable Development and Regulatory Services
Telephone	01865 252015
e-mail	<a href="mailto:sbharrison@oxford.gov.uk">sbharrison@oxford.gov.uk</a>

Paper copies of the appendices are available in the Members' area

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