

To: Cabinet
Date: 18 October 2023
Report of: Head of Planning and Regulatory Services
Title of Report: Proposed Submission Draft Oxford Local Plan 2040

Summary and recommendations	
Purpose of report:	To seek approval for the Oxford Local Plan 2040 Proposed Submission Document for public consultation and recommend to Council its approval for 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 2040 to the Secretary of State for formal examination.
Key decision:	Yes
Cabinet Member:	Councillor Louise Upton, Cabinet Member for Planning and Healthier Communities
Corporate Priority:	Enable an inclusive economy; deliver more affordable housing; support thriving communities; pursue a zero-carbon Oxford
Policy Framework:	Development Plan Document
Recommendations: That Cabinet resolves to:	
<ol style="list-style-type: none"> 1. Recommend to Council that it approves the Oxford Local Plan 2040 Proposed Submission Document for consultation; 2. Recommend to Council that it approves the following supporting statutory documentation: the Sustainability Appraisal, Habitats Regulation Assessment, Infrastructure Development Plan (IDP) and Equalities Impact Assessment; 3. Authorise the Head of Planning and Regulatory Services, in consultation with the Cabinet Member for Planning and Healthier Communities, to make any necessary minor typographical changes and modifications to the proposed submission document, IDP, Sustainability Appraisal and Habitat Regulations Assessment, and to agree the final publication style of the draft version before publication; and 4. Authorise the Head of Planning and Regulatory Services, in consultation with the Cabinet Member for Planning and Heathier Communities, to make any minor changes to the document following publication which are deemed 	

necessary as a result of the consultation, and then to formally submit the Oxford Local Plan 2040 to the Secretary of State for examination. In the event that significant issues are raised that suggest the Plan is not sound and major amendments are required, the Plan will need to be re-drafted and brought back to Council to approve another public consultation before submission.

Appendices	
Appendix 1	Proposed Submission Draft Local Plan 2040
Appendix 2	Sustainability Appraisal
Appendix 3	Habitat Regulations Assessment
Appendix 4	Infrastructure Development Plan
Appendix 5	Policies Map
Appendix 6	Risk Assessment
Appendix 7	Equalities Impact Assessment

Introduction and background

1. The purpose of this report is to seek approval for the Proposed Submission Draft Oxford Local Plan 2040 (Appendix 1) for consultation. The Proposed Submission Draft Oxford Local Plan 2040 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 10th November 2023 to 3rd January 2024, it is intended that a public 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 the Sustainability Appraisal (Appendix 2), the Habitat Regulations Assessment (Appendix 3) and the Infrastructure Development Plan (Appendix 4) and the Policies Map (Appendix 5)
2. The Issues and Options Consultation took place in June / July 2021. This represented the first stage of the plan-making process, when several specific issues were identified that the Local Plan needed to address, together with a proposed vision and a set of objectives for the Plan. These were collated to form an [Issues Paper](#) which was then put out for public consultation. Responses were received from individuals, local communities, businesses and other organisations. A [consultation report](#) has been prepared that summarises the responses and findings.
3. Following careful consideration of the feedback from the public consultation, and a growing evidence base, a number of proposed policy approaches were developed. These approaches were presented as a range of options in the Preferred Options document. This contained a series of proposed policy approaches or options that covered a range of topics including housing, economy, communities, and design and heritage. It included a development sites and infrastructure chapter, which set out proposed sites that it was considered would benefit from having a specific site allocation policy.
4. The Preferred Options document went out for public consultation (Regulation 18 Part 1 Consultation) for a six-week period between Monday 3rd October 2022 and

Monday 14th November 2022. A summary report of the comments received is set out in this link

https://www.oxford.gov.uk/downloads/file/8454/preferred_options_regulation_18_part_1_consultation_report. A Housing Need Consultation (Regulation 18 Part 2) was also undertaken which ran for a supplementary 6 week consultation period from Monday 13th February 2023 to Monday 27th March 2023. A summary report:: https://www.oxford.gov.uk/downloads/file/8563/preferred_options_regulation_18_part_2_consultation_report has been published.

5. The purpose of these previous stages of consultation was firstly to understand the issues identified by the public which they thought the Plan should cover and then in 2022 to get views on a range of options for policies, called 'preferred options' and in part 2 to consult on the housing need assessment. These consultations informed the development of the draft policies in the Proposed Submission Draft.
6. This consultation on the Draft Submission Version of the Plan, to run for over seven weeks from 10th November 2023 until the 3rd January 2024, 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 then 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

7. The Submission Draft 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 2036. The Northern Gateway Area Action Plan (AAP) is due to expire in 2026 so the site allocation policy will replace it. Any adopted Neighbourhood Plans will be the only other documents containing statutory planning policies.
8. During the preparation of the Local Plan 2040 there have been some significant national and local changes that have influenced the approach we have taken in drafting the detail of the site allocation policies. The key proposed change from national government has been the concept of introducing "the permission in principle consent route". This proposed approach although not progressed at the time of writing has encouraged us to write more detailed policies than we have done in previous Plans.
9. This increased level of detail ensures that policies are drafted as comprehensively as possible to provide more certainty to both developers and local residents about the proposals and the considerations for a site. The site allocation policies have been produced by a thorough process informed by detailed urban design appraisals. The structure of the Plan 2040 provides supporting text but with a more detailed policy content for the individual themed policies together with those for Areas of Focus and Development Sites. The sections below briefly summarise the key points from each chapter of the Plan.

Introduction, vision and strategy

10. A range of sources of data and background information have been used in Chapter 1 to describe Oxford's strengths and role and the challenges it faces over the next 20 years, which have fed into the vision and informed the strategy. The vision for Oxford is summarised as:

- A healthy and inclusive city to live in
- A fair and prosperous city with a globally important role in learning, knowledge and innovation
- A green and biodiverse city that is resilient to climate change
- A city that utilises its resources with care, protects the air, water and soil and aims for net zero carbon
- A city that respects its heritage and fosters design of the highest quality
- A liveable city with strong communities and opportunities for all

11. Four strategic policies are set out in Chapter 1. Policy S1: sets out the overarching approach to locating new development and for sustainable growth with a priority to deliver affordable homes, focus employment on existing sites, and protect green and blue infrastructure networks. Policy S2: sets out the importance of good design. Policy S3 Says the City Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan and sets out delivery mechanisms. Policy S4 focuses on viability. It sets out when viability evidence may be accepted it specifies the order in which changes to a proposed scheme should take place until the proposed scheme becomes viable. The approach prioritises social rented housing, as that is the last adjustment that should be made to achieve viability, only after adjustments to parking levels and carbon offsetting costs (if there are any) have been made.

A healthy and inclusive city to live in

12. Chapter 2 is concerned with the delivery of housing. There is an urgent need for new homes in Oxford, but a limited and constrained supply of land available for development in the city. Policy H1 sets out the housing requirement over the Plan period 2020-2040. The level of housing need reflects the exceptional circumstances of the Oxfordshire economy, its performance and its significant contribution to the regional and national economy, which acts as a key driver of housing need that impacts on current and future demographic trends and market signals. If lower levels of housing were pursued then there would be greater in-commuting, a worsening of affordability and constraints placed on Oxford's economy.

13. The policy approach to help meet the housing need, has been to maximise capacity in the city. The Housing and Economic Needs Assessment (HENA), jointly commissioned with Cherwell District Council, objectively assessed the housing need for Oxford. This looked at four scenarios. Due to exceptional circumstances, a method other than the Government's Standard Method is used to determine Oxford's housing need. The most appropriate scenario to represent Oxford's housing need is based on an independent assessment of expected economic

- growth in Oxfordshire. The HELAA and site allocations policies in this Plan aim to prioritise residential development over other uses, including employment land.
14. This policy approach has sought to maximise the site allocations for housing, promote the efficient use and development of land and sites, including highest densities and building heights in appropriate locations, and allow an element of housing on all employment sites, where suitable. However, the identified capacity of housing land is below the identified housing need, and therefore a capacity-based housing requirement has been set in Policy H1.
 15. One of the biggest issues facing residents in Oxford is the unaffordability of homes, to rent or to buy. Oxford is one of the least affordable places in the country. The high need for new housing in the city means that general market house prices are expensive both to buy and rent. Policy H2 seeks to deliver affordable housing. On large residential sites of 10 or more units a proportion of affordable housing units will be sought. In the case of student accommodation or retirement homes a financial contribution will be sought instead. In Oxford, social rent (the most discounted form of affordable housing to rent) is the only option for many people. Social rented housing is therefore the priority tenure of affordable housing in Oxford, and of the 40% affordable housing requirement on qualifying developments, the majority is expected to be social rented housing. The remainder may be provided as intermediate forms of affordable housing. The current Oxford Local Plan (2036) requires 50% affordable housing. The whole-plan viability report demonstrates that this would not be viable for many developments. The requirement is set at a level that should ensure the majority of developments are viable, which will limit the amount of viability evidence that will need to be assessed at the planning application stage. The policy requires 80% of affordable homes to be social rented.
 16. The policy does not set a requirement for First Homes. This is a Government initiative and the requirement overrides existing policies. 25% of affordable homes should be First Homes, which means they are available to buy for first-time purchasers at a discounted rate and for no more than £250,000. However, the approach does not work well in Oxford, given the city's affordability issues and profile of its sites. The argument will be made through the examination process that First Homes should not be a requirement in Oxford.
 17. Policy H5 seeks to provide employer-linked housing which recognises the challenges that employers face in both recruiting and retaining staff in Oxford given the shortage of housing and its affordability. This acute staffing issue impacts on the operation and provision of key services such as schools and hospitals. Employer-linked housing involves the development of housing on their own specified sites, by specified key employers in the city to provide a means of delivering affordable housing for their own staff. For example, the NHS provide staff accommodation within the hospital sites.
 18. The large number of students resident in Oxford has an impact on the availability of general market housing. Policy H9 aims to ensure new student accommodation is built only in suitable locations and is limited to those on courses of a year or more who are receiving the greatest and longest-term educational benefit. It

prioritises students of the two universities to assist with the economic aims of the Plan in supporting the universities. Policy H10 ensures that where new academic and teaching facilities are proposed that support additional students, that these students' accommodation needs can be met. In the case of the universities this will be measured by the set threshold of students living outside of university accommodation such as student halls.

A prosperous city with a globally important role in learning, knowledge and innovation

19. Chapter 3 is concerned with Oxford's economy. Policy E1 encourages the intensification and modernisation of key employment sites within the city and recognises the important role played by category 1 (national and regional) sites in contributing significantly to the national and regional economy. Category 2 (local) sites are well performing and provide key supporting services for Oxford's economy to function properly. Category 3 employment sites mainly comprise smaller, poorly located sites that do not perform such an important economic function or are likely to be able to do so in the future. The policy approach supports sustainable development and seeks to make the best and most efficient use of existing employment sites but does not allow for new employment sites except in the city centre and district centres where there is expected to be a range of uses.
20. In recognition of the acute housing shortage in the city the new employment strategy approach makes it clear that an element of residential development will in principle be supported on employment sites. This includes both category 1 and 2 sites where this would not prejudice the site's present or future continued use as an employment site and would result in well-located, and well-designed homes being provided. In addition, Category 3 sites would be allowed in principle to change their use and/or be redeveloped for residential development subject to criteria to ensure that Oxford maximises the delivery of homes within the city and that homes are appropriate on the site.
21. The Employment Land Needs Assessment (ELNA) Update for Oxford prepared by Lichfields states that some 296,000 sqm of employment floorspace is required to meet the city's employment needs over the plan period. A high proportion of this need is attributed to office; research and development; and laboratory space which reflects the market demand profile for the city and to build on Oxford's key economic strengths.
22. Warehousing and storage uses can play an important role in the operation of some key employers and contribute to the supply chain. However generally they do occupy a considerable land area, do not generate many jobs and compete for a limited supply of land. So in these circumstances Policy E2 will only support new and or expanded warehouse uses on existing employment sites where it can be shown that they are required for operational reasons by a Category 1 employment site.
23. The Oxford Economic Strategy includes a policy which promotes 'an inclusive economy' which can include the delivery of affordable workspace. To that end the Policy E3 requires that development proposals delivering commercial

developments on named sites, to produce an affordable workspace strategy detailing how affordable workspace can be delivered as part of their masterplan. Community Employment and Procurement Plans (CEPPs) can play a significant role in improving job opportunities for local people and support both the local labour market and the businesses that operate in Oxford or wish to move to the city. Policy E4 therefore seeks to secure a CEPP for developments of 50 or more homes or over 1,000sqm non-residential floorspace.

24. Policy E5 is concerned with tourism and short-stay accommodation. The policy directs new holiday and short-stay accommodation to sustainable locations, including the city and district centres and main arterial roads. The expansion and or refurbishment of existing accommodation is supported in principle subject to criteria. Whilst larger accommodation of 10 beds or more in sustainable locations is sought to be retained, unless evidence of non-viability can be demonstrated.

A green biodiverse city that is resilient to climate change

25. Chapter 4 is concerned with protecting and enhancing green and blue infrastructure, delivering net gains in biodiversity and building in resilience to flooding and promoting sustainable drainage and resilient construction methods. The policy approach in the Local Plan recognises the multi-functional benefits of our GI network and seeks to ensure that we protect (Policy G1) a range of spaces and features for the benefit of the city now and into the future, where possible enhancing (Policy G2) these and providing new features to strengthen that network. Policy G3 includes more specific requirements around providing green, natural surface cover on specific types of development through the use of the Council's Urban Greening Factor policy tool.
26. All new planning applications will be required to deliver biodiversity net gain, in accordance with the Environment Act 2021, with an initial requirement of 10% introduced for large sites in November 2023 and small sites in April 2024. Policy G4 sets out the expectation that biodiversity net gain is delivered either onsite or within those areas of land within the city which have been identified as being most beneficial for supporting the wider ecological network, to secure as much benefit as possible for nearby species and habitats. If robust evidence is provided to show net gain cannot be achieved onsite or offsite, then the purchase of biodiversity units from a habitat bank or statutory biodiversity credits may be accepted to meet net gain.
27. Policy G5 seeks to enhance on-site biodiversity into landscaping or building facades / roof spaces to meet priority habitats and protected species. Policy G6 requires development proposals to conserve and enhance biodiversity including safeguarding the key sites of Oxford's ecological network.
28. Policy G7 is concerned with flood risk. It requires development proposals to have considered the potential for flooding from all relevant sources now and for the lifetime of the development, including climate change, as well as the potential for them increasing flood risk elsewhere, safety of users of the development, and that they have appropriately addressed any flood risks where they are identified. This would require a Sequential Test and Exception Test to be carried out and passed.

A site-specific flood risk assessment (FRA) would be required in key areas of the city.

29. Policy G8 requires all new developments to manage surface water through Sustainable Drainage Systems (SuDS). SuDS must be designed in a way that incorporates reuse, infiltration, retention, or conveyance methods which utilise natural, green, and blue infrastructure rather than unnatural, artificial components. The policy requires surface water runoff to be managed to greenfield run-off rates as close to its source as possible. Policy G9 requires a design and access statement to show how the design and construction has responded to existing and future climate and potential weather extremes that the development will have to function within.

A city that utilises its resources with care, protects the air, water and soil

30. Chapter 5 includes policies that seek to ensure that new development comes forward in a way that does not further exacerbate climate change through additional carbon emissions to support the significant reductions needed from the existing built environment over the coming years – also known as climate change mitigation to help achieve net zero carbon.
31. Three key policies address the built environment. Policy R1 provides requirements for the carbon efficiency of buildings once they are in operation and throughout their lifetime. Policy R2 focuses on emissions associated with the construction process, and Policy R3 is concerned with the importance of retrofitting existing buildings in the city and sets out that carbon efficiencies may be considered a public benefit.
32. The second part of this chapter then deals with the protection of various natural resources and ensuring that the development process mitigates its impact on the wider environment. Policy R4 addresses the issue of air quality, which is a key concern in the city due to ongoing issues which arise from a range of sources, including tail pipe emissions, burning of fossil fuels for heat as well as construction pollutants. Policies R5 & R6 are concerned with the quality of land and its soils. As a result of development over many years in Oxford there are contaminants, such as landfill. Policy R5 therefore sets out guidance on what will be expected from new development and how it should address any contaminated land.
33. Policy R6 sets out the need to conserve and enhance soil quality, including peat reserves. Policy R7 then goes on to deal with the wider impacts on amenity & environmental health, including a range of potential risks that new development should seek to mitigate, such as noise and nuisance. The policy approach to water quality is dealt with through inter-linked policies in the Plan. Policy R8 considers the amenity & environmental impacts of new development on the use of water. Whilst Policy G9 provides advice on resilient design and construction for new developments together with Policy G8, which promotes multi-functional green SuDs.

A city that respects its heritage and fosters design of the highest quality

34. Chapter 6 is concerned with policies that respect the city's heritage and foster high quality design. The approach is to conserve and value the significance of Oxford's heritage, and seeks to achieve well-designed, beautiful buildings and public spaces. High-quality design in Oxford is dependent on an understanding of the city's heritage and managing change in a way that meets future needs whilst ensuring no harm is caused to its important heritage assets.
35. Policy HD1 sets out the criteria for assessing the impacts of new developments in Conservation Areas, being designated heritage assets and the importance of ensuring that they are protected and enhanced. Policy HD2 deals with Listed Buildings and the need for new developments to be informed by heritage assessments to weigh the impacts of proposals on both the significance of listed buildings and their settings. Policy HD3 is concerned with the assessment of new development proposals on Registered Parks and Gardens, as designated heritage assets. Whilst Policy HD4 provides criteria for assessing the impact of new developments on a Scheduled Monument.
36. Policy HD5 provides criteria for assessing the impact of new developments on archaeological remains in the city centre, allocated sites or areas where archaeological features may be present. Policy HD6 seeks to ensure that new developments do not adversely impact on any non-designated Heritage Assets. Policy HD7 then sets out the principles of high-quality design, which need to show that it is responsive to its context, creates or enhances local distinctiveness & ensure that the amenity of the natural environment is protected.
37. Policy HD8 is concerned with using context to determine the appropriate density for the development of a site. The policy includes criteria to ensure that a proposal makes the best use of its site capacity, but properly reflects its context & place in Oxford, in terms of scale, layout & density. Policy HD9 then goes on to assess views & building heights. It seeks to ensure development retains the significance of the historic skyline and views to it and from it. Detailed assessments will be required for developments that may be impactful because of their height.
38. Additional policies focus on the well-being of new & surrounding occupants, including the need for a Health Impact Assessment for larger developments, and that proposals meet privacy, daylight & sunlight requirements & internal & external space standards.

A liveable city with strong communities and opportunities for all

39. Chapter 7 explains that Oxford is a liveable and accessible city with a range of services within a 15-20 min walk or cycle ride. The city has a good public transport network that provides access to other key areas of the city further away. Policy C1 sets out the hierarchy of centres. The policy approach is to focus town centre uses in the city and district centres, supporting liveable neighbourhoods. Whilst local centres help to provide local services together with community facilities. Any town centre uses, which is a use that attracts people to it, should be directed first to city and district centres, then to sites adjacent to them and only elsewhere if it can be demonstrated there are no alternatives. Policy C2 seeks to maintain vibrant centres & provides general design principles to guide future development and

promote vitality and viability. The policy aims to retain active frontages, which support a balanced mix of uses.

40. Policy C3 aims to protect existing local community facilities and support improvements to make more intensive use of existing sites, whilst Policy C4 recognises the importance of schools, libraries and places of worship and seeks to protect them and support their improvement. Their loss would only be supported in circumstances where it was no longer required to meet community needs, or where alternative facilities can be provided. Policy C5 is concerned with the protection of existing cultural, social and visitor attractions, but supports in principle their alteration, subject to criteria, and the provision of new cultural venues and visitor attractions in appropriate locations.
41. The transport and movement strategy of the Plan seeks to reduce the need to travel, promote active travel, public transport & support the implementation of the County Council's Core Schemes of the Central Oxfordshire Travel Plan. Policy C6 requires major new development proposals to optimise active travel & public transport opportunities and aim to limit the increase in car journeys which would add to air pollution & congestion across the city. This policy approach therefore supports the need for major proposals to submit Transport Assessments and Travel Plans in line with published County Council guidance; together with advice set out in the Street Design Guide. Parking design standards for bicycles & powered two wheelers and motor vehicles are set out in Policies C7 & C8. Whilst Policy C9 provides advice on electric vehicle charging.

Development sites, Areas of Focus and Infrastructure

42. Chapter 8 is concerned with Development sites, Areas of Focus and Infrastructure delivery. Development site allocation policies provide advice on what type of land use, or mix of uses is acceptable on a specific site. This positive approach ensures that the right type and amount of development happens in the right place in accordance with the strategy of this Plan & NPPF policy. In response to emerging national government proposals the content of these policies includes greater detail than in previous Plans. There are five 'Areas of Focus' defined across the city (Northern Edge of Oxford, North of the City Centre, Cowley Branch Line and Littlemore, West End and Botley, Marston Road and Old Road). These are areas where changes are anticipated over the Plan period as a result of new development – either within the city or adjacent to its boundaries. They include site allocations for development alongside key principles relevant to the area & its wider context.
43. There are several sites around the edge of Oxford which are allocated for housing in the most recent adopted plans of neighbouring districts, to help deliver the unmet housing needs of Oxford up to 2036. Development has commenced on several of these sites and planning applications submitted for others.
44. The Infrastructure Delivery Plan (IDP) provides a summary of the infrastructure needs across Oxford & sets out the infrastructure schemes to meet these needs, taking into account the amount of future housing and employment growth over the Plan period. There are four IDP quadrants comprising the North, South, East and West and Central Areas, which include respective Areas of Focus together with key development site allocations. Each IDP Area highlights key considerations for

infrastructure and design which are common across their respective area. This could include for example improvements to walking and cycling routes, public transport connectivity, promoting good urban design & place making and increasing public access to green spaces.

Sustainability Appraisal and HRA

45. A Sustainability Appraisal has been carried out to assess the options against the Sustainability objectives (Appendix 3). This work has informed the selection of preferred options and the drafting of policies. A Habitat Regulations Assessment (HRA) 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 (Appendix 4). The Sustainability Appraisal and HRA will be published alongside the Proposed Submission Draft Local Plan and will also be available for consultation.

Consultation

46. The consultation responses and engagement are an important input into preparing and shaping the content of the Local Plan. The Oxford Local Plan Local Development Scheme (LDS) 2022-2027 set out the programme for the production of the Local Plan 2040. The engagement and consultation has been and will be consistent with the Statement of Community Involvement (SCI) in Planning adopted in June 2021, and appropriate to the stage.
47. The Issues and Scoping of the Options took place in June / July 2021, which sought to identify the key issues for the Local Plan to address. The Preferred Options Consultation (Regulation 18 Part 1) was carried out in October / November 2022, which was followed by a Housing Need Consultation (Regulation 18 Part 2) that ran during February / March 2023. These two consultations sought to obtain views on a range of policy options, Preferred Options, together with the Housing Need Consultation. These consultations were then used to inform the development of the draft policies in the Proposed Submission Draft.
48. 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

49. Production of a Local Plan is a significant and multi-year financial commitment. In particular the costs associated with examination are notable. The budget of the Planning Service is drafted and has been approved with this service pressure in mind. The costs associated with the production of the Local Plan, including the consultation, are being met through the annual Local Plan budget, funds previously allocated to the Oxfordshire Plan (JSSP) reserve, and the resources of the Planning Policy team. Policies have been drafted to be as easy to evidence (for the developer) and assess (for officers) as possible. In many cases the policies will require a change in the assessment process from that existing under the current Local Plan. However, some of the policies as drafted will have

moderate resource implications at implementation stage for other teams in the Council, for example assessing compliance with the carbon reduction policy, biodiversity net gain (a Government requirement in any event) and community employment plans. Relevant teams have been consulted on the draft policies and are satisfied with the implications, and training for planning officers will be provided so that specialist advice is only required on the most complex applications.

Legal issues

50. 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.
51. The Local Plan is a statutory document the Council must produce. The draft submission document is prepared for the 3rd round of consultation, which will follow the 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

52. The completed Risk Assessment is attached as Appendix 6.

Equalities impact

53. 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 7). Consultation on the EqIA will be combined with the consultation beginning on 10th November.

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