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**Oxford City Council response
to Inspectors initial questions
and comments**

Question 4

July 2019

Question 4: Ensuring effectiveness

This is an issue closely related to the capacity of the City to accommodate housing and student housing. The NPPF states that plans should be shaped by engagement with, among others, local organisations and businesses. Some of those making representations at Regulation 19 stage have alleged that a lack of direct engagement from the Council has resulted in the Plan not taking into account their site and business intentions, and that the site policies therefore contain unrealistic or inaccurate requirements. At this stage we are not in a position to judge whether this is the case, but many of these parties have substantial land holdings and this may have relevance to any assessment of the true capacity of the City to accommodate housing and other development, as well as the overall effectiveness of the Plan. Will the Council therefore provide us with details of how the Council engaged directly with key businesses and landowners during the process of drawing up the Plan’s specific policy and land use requirements (as opposed to the more general work on the HELAA), how those discussions influenced those policies, and where the analysis can be found. These parties include, for example (and this is not exhaustive): The University of Oxford and the colleges; Oxford Brookes University; The Oxford Centre for Islamic Studies; BMW Mini; Oxford Health NHS Foundation Trust; Oxford University Hospital; Cowley Investments; other parties with substantial landholdings or key sites; and non-university further education institutions.

- 4.1 The process for the development of the Oxford Local Plan 2036 (“the Plan”) was conceived as an iterative and holistic one that considers all aspects of policy. In keeping with the strategic objective of balancing the economic, social and environmental needs of the city, the Plan has been developed through a comprehensive process that considers each element as interlinked and interdependent.
- 4.2 The evidential basis of the Plan is broad and diverse, comprising of various sustainability appraisals, studies, the Housing and Economic Land Availability Assessment (HELAA), data points such as the housing trajectory, landowner updates and feedback received from consultation rounds. The development of the Plan is such that there is a high level of interdependency between each element and workstream and as such it would not be possible to truly isolate an individual element from the overall plan making process. As an example, the HELAA functions as an essential evidential document that informs the policies and proposals in the Plan, even though it is a distinct document that appears to be self-contained. It is in turn informed by other evidence such as sustainability appraisals, topographical studies, data points such as the housing trajectory and updates from landowners.

- 4.3 The Plan has been drafted in continuous dialogue with key stakeholders across the city, as already referenced in responses to earlier questions. There have been several opportunities and means by which key stakeholders are able to engage substantively with the process. We consider that the overall consultation strategy was inclusive enough to reflect a wide range of views. The various levels of engagement have contributed to the shaping of all policies, including the site policies.
- 4.4 Consultation with key businesses and landowners that has informed the drawing up of specific policy and land use requirements has been through a range of means at various stages throughout the Plan process. This has included formal consultation stages, updates to the HELAA, through regular meetings of groups such as the Oxford Strategic Partnership and through direct contact. For the key stakeholders in particular, there have been several opportunities to pass comment on the content and direction of travel for the development of policies that ultimately form the Plan, to the extent that objections or support could be registered. In this context the absence of a response is often deemed as implied consent or lack of objection.

Formal consultation process overview

- 4.5 Consultation on the Plan has included three formal stages. This included an extra early stage of consultation, the 'First Steps' consultation, which was in addition to the statutory requirements. A lot of effort was put into maximising involvement in the early stages of plan development. The earlier stages of consultation had a variety of means for people to get involved, depending on their time and level of interest. The consultation process is set out fully in the Consultation Statement (CSD.3).
- 4.6 Involvement of local communities and other stakeholders from the outset in the preparation of the Plan has been a key priority for Oxford City Council ("the City Council"). The main stages of consultation to date on the Plan are as follows:
- First Steps consultation (June - August 2016);
 - Preferred options consultation (Regulation 18, 30th June and 25th August 2017);
 - Proposed submission consultation (Regulation 19, 1st November 2018- 13th December 2018 and extended to 28th December 2018).
- 4.7 There was also engagement between these formal stages, which in each case is around 12 months. Some of this more informal engagement is summarised later in this response.

Preferred Options (Regulation 18) Consultation

- 4.8 The City Council conducted an extensive consultation exercise over the summer of 2017 to publicise the project and engage the Oxford community in the preferred options stage of the plan making process. This was preceded by a First Steps Consultation between June and August 2016, undertaken in addition to statutorily required consultations in order to front-load public engagement in the early preparation of the Plan. The preferred options consultation aimed to involve residents, workers, employers, students and visitors to Oxford as well as stakeholders and service providers. This was done through the delivery of a questionnaire door-to-door across the city (approximately 60,000 properties). Letters were sent to various organisations and individuals, which included the statutory stakeholders and a wide range of interest groups, developers and agents.
- 4.9 At this stage in the plan making process, the material that was published was focused on presenting the preferred policy options, and providing the evidence base that had led to the development of the policy options and to the preferences for those options. The consultation focused on asking consultees whether they agreed with the City Council's preferences for the policy options. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind.
- 4.10 For people with minimal levels of time or interest, a simple questionnaire was developed. Comments were also invited via social media. The leaflets were distributed to every household in the city and were also available in the City Council offices, Central and local libraries, and in 30 community or leisure centre locations.
- 4.11 People with a greater interest and substantive stakeholders could review the preferred options consultation document along with supporting material including a Draft Sustainability Appraisal, Background papers and the Green Belt Study. They were able to comment via a structured online questionnaire, with the option of submitting additional written feedback via the City Council webpages, email or post. The materials described above were available online, with hard copies in City Council offices and the central/local libraries, or available on request.

Proposed Submission (Regulation 19) Consultation Process

- 4.12 The consultation on the proposed submission document and Sustainability Appraisal (SA) report commenced on 1st November 2018. Representations were invited initially over a six week period until 13th December 2018. This was extended subsequently to a total of eight weeks until 28th December 2018. This consultation period exceeds the

requirements of the Town and Country Planning (Local Planning) Regulations 2012 and the City Council's usual consultation period as identified in its Statement of Community Involvement.

- 4.13 Previous stages of consultation focused on using wide ranging and adaptable opportunities for engagement in order to maximise the numbers of people who got involved and the benefits of consultation. The proposed submission stage is a formal consultation period which focuses on the soundness and legal compliance aspects of the Plan. Responding to the consultation inevitably requires a greater commitment of time and effort in order to frame responses in terms of the tests of soundness/legal tests so that they are relevant to the examination. Notifications to statutory consultees and duty to cooperate bodies were supplemented by direct notifications to those registered on the City Council's database. This includes those involved in previous rounds of Local Plan consultation, residents' associations and interest groups. Publicity was primarily via direct notification; however other means of dissemination were used, including press releases, social media, postings on community notice boards and drop in events. Oxford Civic Society and Oxford Preservation Trust also hosted meetings with planning officers in attendance to discuss the Plan and give guidance on how to make responses.
- 4.14 The Consultation Statement includes a summary of comments received. The preferred options consultation document (PCD.2) did not include draft policies but it did set out where further work with the landowner or developer is required and it also included a list of potential uses assuming satisfactory evidence of suitability and deliverability. The Consultation Statement summarises the comments received in relation to sites and sets out how these were taken account of in the proposed submission draft (pages 117-129).
- 4.15 A number of Regulation 19 responses we received were with respect to individual sites, and were written by agents acting on behalf of established landowners such as Oxford University and the associated colleges. They have been written in the context of a wider level of dialogue that is already ongoing in most cases, though this fact may be difficult to appreciate when representations are reviewed on their own. This response attempts to highlight how an understanding of the requirements of key businesses and landowners has been established and has informed policy development, and to highlight where references to this ongoing process of engagement are contained in the evidence base.

Call for sites, landowner updates and HELAA

- 4.16 As well as the formal stages of consultation site specific contact has been made with major landowners, planning agents, public bodies, large institutions and registered providers known to the City Council. During March and April 2016 a call for sites was made which allowed for suggestions of sites within the city for consideration in the HELAA and/or future allocation in the Plan. It allowed for suggestions for allocations for any type of land use, as well as consideration of any constraints as relevant. Estimates for capacity and floorspace and any extant planning decisions or discussions with development management officers (pre-application or otherwise) were taken into consideration. Known landowners were directly contacted and there was further publicity during the First Steps consultation and on the City Council webpages. It was always reiterated that this was an open call that could be responded to at any time. City Council officers also took a proactive approach in looking out for and identifying sites with development potential and seeking out their provenance. As such “parties [with] substantial landholdings” would have had ample opportunity to register their interests with the City Council. Each of the sites identified from these call for sites exercises that met the threshold criteria were assessed in stage 2 of the HELAA and are listed in Appendix A.
- 4.17 The City Council has maintained regular contact with relevant landowners (or their appointed representatives) for updates on sites identified as potential allocations in the Plan. The majority of these were identified during the second call for sites at the preferred options stage. The purpose of the update was to confirm that our records are correct with respect to the ownership and parameters of the sites, and also to determine if there have been any changes in the landowners’ development intentions since the sites had been identified. Standardised forms were sent to the landowners or their representatives, as was the case in previous updates, and the information collated included development potential, site constraints, approximate time frames for site availability and indications of other factors that may inhibit development. Follow ups by phone or email were carried out as required to make clarifications or fill any gaps.
- 4.18 The last such update was carried out in early 2019 starting before and continuing after the submission of the Plan as part of the annual monitoring. Landowners were asked to provide their latest anticipated delivery rates for their sites based on realistic projections within the timeframe of the Plan. These interactions and discussions provided several data points that are used to develop the updated housing trajectory submitted as PSD.4 and .5. The impact of this latest round of developer contact is explained further in response to question 3.

- 4.19 The call for sites and regular contact with landowners has informed the HELAA and also the Plan. We consider the HELAA is a key element of the plan making process and is therefore a fundamental part of the engagement on the Plan and should not be seen as an independent process. It was made clear in the 2016 call for sites that we were looking for information that would help to inform drafting of the Plan as well as to update the HELAA. Information received from landowners from the call for sites process or other direct contact throughout the Plan making process has informed the HELAA and policies in the Plan. The call for sites at the early stage of consultation in 2016 was important in informing the preferred options consultation document. The information put forward by landowners were all given consideration in terms of whether they would comply with other policies and the Plan's strategy.
- 4.20 The updated trajectory makes it clear that landowners have been extensively engaged in stating their intentions for their land. The Council has impressed on landowners in unambiguous terms the importance of their input and encouraged them forthcoming with as much direct information as possible. The housing numbers and timescales are informed by the information provided by the relevant landowners as well as wider evidence supporting the Plan. A dialogue is consistently maintained in order that any projections are based on realistic terms of delivery and are policy compliant as far as possible. This work has built upon the earlier call for sites as described above. The process is further chronicled in the Site Audit BCP 20 and set out more fully in response to question 3.
- 4.21 Deciding of the appropriate mix of uses for each site policy requires a planning judgement to be made that balances landowner aspirations and assessment of what uses are appropriate on the site based on the Plan strategy and Sustainability Appraisal (CSD.5). The Sites Audit Background Paper (BGP.20) sets out the assessment that all sites taken forward from the Preferred Options stage were subjected to. This included an assessment of each site against the refined policy approach including Sustainability Appraisal. As noted in paragraph 12 of the background paper, each site was also assessed for its likelihood of being delivered, and the City Council is satisfied that each of the sites taken forward is likely to come forward for development during the plan period. This assumption includes knowledge of landowner aspirations gained from frequent contact.

Duty to Cooperate

- 4.22 The City Council has prepared a Duty to Cooperate Statement (COM1) and a number of Statements of Common Ground (COM 2-8) with additional ones currently at drafting stage. These documents demonstrate effective engagement on an on-going basis that goes beyond the bodies covered by the Duty to Cooperate. We are currently drafting

further Statements of Common Ground for a number of landowners/developers with sites included in the proposed site allocation policies. Statements of Common Ground signed so far include some with major landowners: BMW (COM.8), Magdalen College (COM.9) and Shaviram Group (Former Nielsen sites COM.10). These show areas of common ground between these parties and the City Council, which may be dependent on the Inspectors accepting proposed changes to policies.

Committee meetings including major landowners

Oxford Strategic Partnership

- 4.23 The Oxford Strategic Partnership (OSP) was founded in 2003 and brings together senior representatives from the public, businesses, community and voluntary sectors. The OSP helps to provide direction for the city's future, respond to local priorities and engage more effectively with local concerns. The Steering group comprises of representatives from Oxfordshire County Council, Oxford City Cabinet members, University leadership, developers and key employers. Regular comprehensive updates on the Plan and the consultation stages are presented to the group at regular intervals and attendees are invited to raise concerns or make representations as appropriate. Key meetings include those on 14th March and 20th July 2017 where council planning officers presented on the Plan Preferred Options and how members can contribute to the subsequent stages. Further updates were made during a meeting on 23 October 2018 prior to the submission of the draft for examination.

Housing panel (Scrutiny Committee Panel)

- 4.24 The Housing Panel is a cross-party panel established by the Scrutiny Committee that meets approximately 5 times a year to scrutinise all housing issues. This includes reviewing quarterly performance reports and key policy proposals. The Housing Panel receives regular briefings and updates in relating to the relevant policies in the Plan and major landholding stakeholders such as the universities and major employers are often participants or making representations. The agenda and minutes of these scrutiny panels are publicly available for review on the City Council website.
- 4.25 The Housing Panel has been the source of outcomes that have informed modifications to the Plan. An example includes a meeting that was convened on 9 November 2016, quite early in the plan making process. The Pro Vice Chancellor for Planning and Resource Allocation at the University of Oxford and the Director of Infrastructure Investment at Oxford Brookes University had the opportunity address the panel on how their institutions were affected by the housing situation in Oxford and their responses to it, as well as general proposals to the inform the Plan. There was also a discussion on the position with respect to the accommodation of key worker housing within the

city. The outcome of this meeting was a report on University Housing Needs (dated 9 February 2017), which contained a summary of the discussions with both universities and a set of recommendations to inform the emerging Plan. A number of those recommendations were ultimately reflected in various parts of the Local Plan, and were as follows:

- Allocating specific sites for new student accommodation for the two universities (various site allocation policies);
- Exempting groups such as post-doctoral researchers and nursing and teaching students from the target of no more than 3,000 students from each university living outside of university-provided accommodation in the city, balanced by a reduction in the target figures (policies H3, H9)
- Limiting the use of new student accommodation to the two universities (policy H8);
- Reviewing the local key worker definition to potentially include postdoctoral researchers, nursing and teaching students and university support staff (policy H3);
- Providing some flexibility to substitute some of the social rent planning obligations with key worker housing obligations in order to encourage key worker housing schemes (including accommodation for postdoctoral researchers) (Policy H3)
- Providing additional flexibility in the balance of dwellings policy specifically for key worker housing schemes.

4.26 During the meeting of 11 October 2018, there was participation from representatives from Oxford Co-Housing, who discussed the inclusion of the proposed policy to support community-led and self-build housing (Policy H7). They had the opportunity to raise concerns and propose amendments. While the majority of the proposed amendments were not included in the policy in order not to undermine the objectives of the overall plan, additional wording and clarifications suggested by the representatives was included in the policy supporting text that are in the submission draft. Council officers and cabinet members were available to constructively engage with the representatives on the reasoning of the policy as written and directly address their concerns.

Headington Forward Partnership

4.27 The Headington Forward Partnership is comprised of representatives of major employers, local authorities (City and County Councils) and residents. Headington Forward concerns itself principally with the area addressed within the Headington Neighbourhood Plan although plans, developments and events outside the area that impact on it will also be regarded as valid topics for discussion. Each institution and local authority is represented by an individual named as an official contact. Residents

are represented by individuals nominated from the membership of community groups that are a part of Headington Action. The objectives are the creation and maintenance of lines of communication between all participating parties and to provide information on proposals and development plans.

Direct contact with specific major landowners/developers

Universities

- 4.28 There have been proactive efforts from the City Council and both universities in the development of the Plan from its earliest stages. Besides individual meetings and briefings, the universities are active participants in various publicly accessible stakeholder forums and events, during which the Plan has been presented and substantive discussions carried out.
- 4.29 Oxford Brookes University: The earliest substantive discussion with Council officers with respect to the Plan was held in May 2016 with the Director of Estates and Facilities and Infrastructure Investment, which was an opportunity to set out their position in regard to key challenges and future plans. A further meeting was held in December 2016, with an expanded scope to discuss the management of student numbers, site development aspirations, perspectives on student accommodation and their thoughts on key worker (employment linked) housing. Oxford Brookes provide information annually to inform the Annual Monitoring Report and this has enabled a continuous line of communication and exchange of information. The allocation of sites and their usage has been done with consideration of the needs and intentions of the university as far as it complies with our policy objectives.
- 4.30 An example of where there has been a responsive relationship with the university is the changes made in relation to the Crescent Hall site, which is currently subject to an allocation in the adopted Sites and Housing Plan. The site was included as suitable and available in the 2016 HELAA (site number 017). It was then removed from the HELAA 2017 following information from the university that they were no longer pursuing redevelopment of the site and therefore it could not be considered available. The site was therefore not re-allocated in the Plan as although suitable was no longer available for development in the plan period. However, this subsequently changed as the university reconsidered their approach. This update was accommodated and the site has been re-introduced as a suitable and available site for residential and student accommodation use in the HELAA 2019 and housing trajectory. However, given the intention of the landowner is now for redevelopment for the same use it is not considered necessary for it to have a site specific allocation where it needed one in the past.

- 4.31 The City Council acknowledges that there have been recent challenges in the engagement with Oxford Brookes University arising from a succession of key personnel changes in a short time period on both sides which has made continuity of communication difficult. It is certainly inaccurate to state that there has been no meaningful engagement from the City Council, when it can be demonstrated otherwise.
- 4.32 University of Oxford: Liaison meetings led by the Chief Executive and attended by planning officers are held on a regular basis with the University of Oxford. They are focussed not just on specific matters e.g. pre-application discussions on development proposals, but include liaison meetings that are open enough to allow for contribution to the agenda from all parties on a range of topics including the Plan. These updates and meetings are substantive in terms of the level of information exchange and level of discussion in order to achieve the best outcomes for the parties while meeting the objectives of the emerging plan.
- 4.33 University of Oxford colleges and recognised independent centres: Meetings took place with all main landholding colleges and city council officers at the beginning of the process in order to establish their aspirations for the Plan period. This included a meeting with Merton on 2nd November 2016, a meeting with Christ Church on 27th May 2016, a meeting with St John's on 3th November 2016 and meetings with Magdalen on 23rd June and 26th October 2016. Dialogue continued following these meetings, including through formal consultation and call for sites. Officers also met with the Centre for Islamic Studies on 10th August 2017 in order to talk through their initial plans for their site. The interests of these parties lie with various policies in the Plan including site allocation policies. With site allocation policies, the preferred uses reflect to a large extent the stated plans and intentions of the landowners as far as they align with the applicable policies in the Plan and the strategic objectives. There has also been scope for fundamental changes. For instance the site allocation policy with respect to the Centre for Islamic Studies (SP17) has been developed with their agreement to apply a single policy to cover two separate but adjacent landholdings.

Non-university further education institutions

- 4.34 Oxford City College is the further education provider in Oxford, with other further education provision being integrated into schools. Oxford City College has landholdings in the West End and Blackbird Leys and regular contact, including through the Oxford Strategic Partnership, means that we have a good understanding of their aspirations and there is no suggestion that a site policy is required for either of their sites. Contact with education institutions other than schools, the university and the further education provider has been through the formal consultation processes and also as part of the

Assessment of Student Housing Demand and Supply for Oxford City Council (ECO.19). Other education institutions don't tend to be substantial landowners.

Health Trusts

- 4.35 Oxford Health NHS Foundation Trust: As well as engagement through the usual process of consultation and call for sites, direct contact with this landowner throughout the process has been engaged in to enhance understanding of the landowners' aspirations for their sites. This landowner has been actively engaged in exploration of the potential for key worker housing and has provided information frequently by email about their intention for their sites, including an early masterplan for Warneford. A meeting with the Trust and City Council in January 2018 informed drafting of the employer-linked housing policy and sites policies and meetings exploring options for key workers across the county have been attended regularly (quarterly over 2018 and 2019) by both parties.
- 4.36 Oxford University Hospitals NHS Foundation Trust: Frequent contact with this Trust has informed development of site policies. A meeting between planning officers and the head of asset management at the Trust took place on 15th December 2016, following the First Steps consultation, in order to inform development of preferred options for the site. A meeting with the City Council's head of planning and the head of the Trust took place on 25th April 2017 at which the Trust further explained their future plans for the site. As with the Oxford Health NHS Foundation Trust the Oxford University Hospitals NHS Foundation Trust has been engaged in the process of exploring options for key workers and have attended regular meetings.

Public bodies

- 4.37 Oxfordshire County Council: Frequent meeting have been held with the County Council as a key infrastructure provider and also as a landholder. Meetings about the County's landholdings specifically included one on 8th February 2017, 8th August 2017 and 20th August 2018. Discussions with the County Council have helped to ensure policies have been drafted with an understanding of infrastructure and operational needs.
- 4.38 Oxford City Council: The City Council has substantial landholdings and discussions have been had throughout the process with the asset management team to understand aspirations for sites.

Key employment sites

- 4.39 MINI Plant Oxford: discussions about this site and the landholder's operational requirements have taken place with BMW Group throughout the Plan process. This included a meeting on 24th November 2017 set up specifically to discuss policy drafting

following the preferred options consultation. The BMW Group provided representations at Regulation 19 stage with respect to site allocation policy SP9, suggesting changes to the wording in order to better reflect their operational needs as well as factual clarifications. The City Council has acknowledged that the Policy E1: Employment Sites should be read in conjunction with the site allocation policy and the suggested changes have been proposed as Main modifications. A Statement of Common Ground between BMW (UK) Manufacturing Ltd and the City Council was signed on 20th March 2019, which goes into further detail on the rationale for the changes.

- 4.40 The Oxford Science Park is owned by Magdalen College, with whom the City Council has been in ongoing dialogue as outlined above. The site may be extended into the proposed South Oxford Science Village and the City Council has participated in discussions involving the College and South Oxfordshire District Council.
- 4.41 Oxford Business Park: The City Council Economic Regeneration team have had ongoing discussions with the Oxford Business Park centring on their plans to modernise the park with an emphasis is on masterplanning. Whilst there less direct engagement with the Local Plan process compared with other stakeholders, the level of engagement with the Regeneration team till date is expected to ensure that the policy direction of the Council is reflected in their planning. The relevant site allocation policy (SP11) has been drafted to take into account the known operational needs of the site and its policy status as a key employment as designated by policy E1.

Other Landowners/developers

- 4.42 Besides the major landholders, the Local Plan has been informed by smaller scale stakeholders. Site allocations have been proposed as have major modifications to specific policies on the basis of representations and direct engagement.
- 4.43 The Shaviram Group made representations to the Submission Draft suggesting changes to the policy wording of SP48 in order to allow for a more flexible approach to a broader range of future uses on the site in addition to employment generating uses. While the site was formerly an employment site in a strategic location, the City Council acknowledged that the requirements for Category 2 sites in policy E1 were not appropriate for the site, as it has been subject to a prior approval application for the conversion of the existing block to residential units. As such the suggested change has been proposed as a Main modification. A Statement of Common Ground (COM.10) has been proposed between the Shaviram Group and the City Council was signed on 6th June 2019, which goes into further detail on the rationale for the changes.

- 4.44 De Merke Estates/MK Dogar Ltd: Frequent meetings have been held with respect to landholdings in the Marston Gap. The promoted sites are largely in Green Belt Land with the potential for adverse impact by development on heritage assets and local character. Negotiations resulted in two parcels being put forward as site allocations in the Plan (SP26 and SP27) , taking into account factors such as accessibility, viability and the impacts of the loss of Green Belt land.
- 4.45 Firoka Group: The land at the Kassam Stadium Complex is jointly owned by the Firoka Group and the City Council. The site was a site allocation in the Sites and Housing Plan and is also brought forward as an allocation in the Plan as Policy SP15. A scheme was previously subject to pre-application discussions, and ultimately not progressed due to policy constraints at the time. The key requirements of the policy as written, including the retention of the football stadium and the preferred orientation of development as a residential led scheme have arisen from discussions have been ongoing with both landholders, and they have expressed their intention to actively support the site allocation at Examination.

Examples of engagement contributing to development of policies

Employer-linked housing

- 4.46 In the drafting of Policy H3 Employer-linked affordable housing, a letter was sent out to 95 employers, including all the colleges of the University of Oxford and all schools in the city. A copy of the letter can be found in Appendix 4 of the BGP8 Employer Linked Affordable Housing. The letter was seeking key employers' views about proactively addressing their own housing needs by building housing on their own land for their own staff. Comments were returned from many significant respondents including, the University of Oxford, Corpus Christi College, Oxford Health, BMW-Mini, Community School Alliance, Oxford Academy and Oxford Bus Company. These were used to inform the policy approach.

Sustainable design and Construction

- 4.47 At the preferred options stage, there were policy options addressing the inclusion of energy efficiency requirements to specific standards, which ultimately resulted in the development of Policy RE1. For non-residential development the preferred option was for carbon reduction requirements to be assessed against BREEAM standards. In their representation the University of Oxford expressed support for the principle of the policy; however they requested recognition by name of the Passivhaus standard which they work to and is a globally recognised standard. The City Council acknowledged the rationale of the representation and this was reflected in the wording of the policy in the draft submission, which allowed assessments based on BREEAM or recognised equivalent assessment methodologies. While the Passivhaus standard was not

referenced specifically by name, the policy as written acknowledges the range of acceptable methodologies that would deliver the objectives of the policy while ‘future-proofing’ the policy to allow for the development of more effective methodologies. The University has not objected to the policy in the Plan.

Conclusion

- 4.48 Our consultation and engagement process has influenced the development of the Plan policies, taking into consideration a broad range of views from respondents ranging from individuals to large employers. The formal consultation process followed provided as many opportunities as possible to engage with the development of the Plan. In addition, there has been direct two way contact with landowners, businesses and other key stakeholders throughout the process. The fact that a stakeholder has been engaged with does not preclude the fact that often the Council’s policy position would not necessarily align with the stakeholder objectives. The policies in the Plan have been developed with the aim of striking the right balance between the housing needs and wellbeing of the city’s residents, the physical capacity of the city, the character and sense of place of the city and broader global factors such as the climate emergency. While policy can be amended and modified to take account of representations, ultimately our policy positions are determined by the needs and strategic objectives as set out in the Plan and justified by the supporting evidence.