

**OXFORD CITY COUNCIL**

**LOCAL PLAN 2040**

**REGULATION 19 PRE-SUBMISSION PUBLICATION CONSULTATION**

**RESPONSE ON BEHALF**

**OF**

**OXFORD UNIVERSITY HOSPITALS NHS FOUNDATION TRUST**

**Carter Jonas**

**JANUARY 2024**

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## 1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by Oxford University Hospitals (OUH) NHS Foundation Trust (“the Trust”) to respond to Oxford City Council’s (“the City Council”) Regulation 19 Pre-submission Publication Local Plan (“the Local Plan”) Consultation.
- 1.2 The Trust is made up of four hospitals: the John Radcliffe Hospital (which includes the Children’s Hospital, West Wing, Eye Hospital, Heart Centre and Women’s Centre); the Churchill Hospital; and the Nuffield Orthopaedic Centre, all located in Oxford; and, the Horton General Hospital in Banbury, north Oxfordshire. The Trust provides a wide range of clinical services, specialist services, medical education, training and research. Close collaboration with the University of Oxford and Oxford Brookes University underpins the quality of the care that is provided to patients, from the delivery of high-quality research, bringing innovation from the laboratory bench to the bedside, to the delivery of high-quality education and training of doctors and nurses.
- 1.3 The purpose of this submission is to provide the City Council with reasoned comments to help in the improvement of the Local Plan and specifically the site allocations for the Trust’s hospital sites in Oxford.

## 2.0 GENERAL COMMENTS

- 2.1 The Trust’s view is that the Local Plan is generally sound, having reviewed its contents and supporting documentation and evidence. There are, however, elements of the Plan that would benefit from some redrafting so as to ensure that the Plan conforms to national policy and that the policies are effective.
- 2.2 The Plan has obviously been drafted with reference to the National Planning Policy Framework, which was last updated in December 2023, post the publication of the Plan.
- 2.3 Soundness, however, is still dealt with at paragraph 35 in the Framework (Dec. 2023). For completeness, that paragraph is reproduced below:

35. *Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

**a) Positively prepared** – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

**b) Justified** – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

**c) Effective** – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

**d) Consistent with national policy** – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

- 2.4 The Trust is pleased to note that “health sectors” is acknowledged as one of Oxford’s key economic strengths in the Local Plan objectives, and that the Trust is recognised as a major employer in the city.
- 2.5 The Trust welcomes the positive and specific recognition of its sites in the Plan. Furthermore, as the City Council is aware, the Trust is working on a set of comprehensive masterplans for the hospital sites in Oxford, and the references to masterplans are pleasing to see. A joint commitment to continue to create and agree masterplans across the Trust’s hospital sites provides certainty in their development and demonstrates support for the types of uses that both the City Council and the Trust are aiming to achieve and increase.

### 3.0 LEGAL COMPLIANCE AND DUTY TO COOPERATE

#### *Legal Compliance*

- 3.1 The Trust raises no concerns about the legal compliance of the Plan.

#### *Duty to Cooperate*

- 3.2 The Trust notes that the Council has produced a scoping paper, and a “Living Statement of Common Ground,” both regarding the Duty to Cooperate. Whilst these two documents list the various joint committees and other groups where the Council is a member, and it also lists ‘stakeholders’ which have been engaged in strategic matters there are limited outputs from this joint working recorded in those documents, or in the Local Plan.
- 3.3 There are strategic matters, the most acute of which is housing need, where there are not shared conclusions between the local authorities in Oxfordshire. The Trust is not raising an objection on the grounds of the Duty to Cooperate, but it does suggest that more evidence is required to demonstrate that all strategic matters have been effectively engaged with, and there is an agreed way forward in meeting the County’s housing needs, and in particular, the very important need for affordable housing for key workers.

### 4.0 POLICY H1: HOUSING REQUIREMENT

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.1 Planning for the right number of new homes is vital to the Trust. This is to meet the needs of staff (and affiliated students), and also the continued sustainability of the wider community of Oxford.

- 4.2 The Trust is concerned that there remains some ‘unmet housing needs’ – the difference between the total need identified the Housing and Employment Needs Assessment (‘HENA’) of some 26,440 new homes, and the “capacity” in the City of 9,612 new homes. As we have suggested with reference to the Duty to Cooperate, at present there does not appear to be a clear, and agreed, strategy for meeting the needs of the County as a whole. A solution to this must be found as soon as is practicable.
- 4.3 The Trust makes no comment about the robustness of the housing land capacity identified in the Housing and Economic Land Availability Assessment 2023, but it is vital that the City can demonstrate that it has left no stone unturned in seeking to deliver as many new homes as it can to engage with the very serious affordability challenge in the City.

**5.0 POLICY H2: DELIVERING AFFORDABLE HOMES**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

5.1 The Trust recognises the acute need for affordable homes in Oxford. This need includes that for its own staff. However the Trust has some concerns about the potential risk to the viable delivery of regenerated and sustainable hospital sites, which the proposed level of obligation could bring. The Trust seeks further dialogue on the nature of financial contributions sought towards the provision of affordable housing, and also the types and location of that housing elsewhere in Oxford.

5.2 What the City Council is proposing has the potential to render the delivery of intensified mixed use sites (including employment), for which they are planning, unviable. This puts at doubt the effectiveness of policy H2 and is potentially contrary to the NPPF at paragraph 34:

*“...Such policies should not undermine the deliverability of the plan.”*

5.3 However, the Trust is reasonably content that the policy is sound provided that the recognition of the need for project specific viability assessments is retained in the policy. It is likely and widely understood that urban, and particularly brownfield development, will bring with it specific viability challenges, therefore the requirement for an applicant to demonstrate that circumstances exist before they can undertake or submit viability work appears unreasonable.

**Necessary modification**

5.4 The Trust suggests that the City Council considers an ‘additional modification’ to clarify the purpose of project specific viability work (additional words underlined and deleted words ~~struck through~~):

If an applicant can demonstrate particular. Some circumstances can that justify the need for a viability assessment, and through an open book exercise demonstrate the affordable housing requirement to be unviable...

**6.0 POLICY H5: EMPLOYER-LINKED AFFORDABLE HOUSING**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.1 The Trust supports and welcomes proposed policy H5. This remains in conformity with the definition of Affordable Housing in the NPPF (2023) that identifies that homes “for essential local workers” can be considered as part of any requirement.
- 6.2 The Trust would very much welcome continued dialogue on these matters, and outlines some areas of concern and support for the aspirations hereunder.
- 6.3 With strong and continuing increases in average house prices and rents in general and in central Oxfordshire in particular the pressure on housing supply and affordability is causing increasing problems for staff employed by the Trust at its core sites.
- 6.4 In recent years the Trust has been gathering information on reasons for leaving the Trust and housing is increasingly cited as a push factor as staff move away for more affordable housing particularly in the early and middle part of careers when space to increase family size is important.
- 6.5 The Trust is also experiencing this as an increasing problem for better paid staff as health service salaries continue to fall behind accommodation costs.
- 6.6 This causes severe recruitment and retention problems for the Trust and causes the loss of experienced people to other cheaper areas. The Trust has some examples of posts that are virtually impossible to recruit on normal employment terms. Clearly this has a negative effect on Trust resources as it has meant an increase in spending on locum, interim and agency staff and the Trust faces increased recruitment costs.
- 6.7 The Trust has some concerns about the likely operation of the criteria and obligations in the proposed policy, or all of their implications – intended or otherwise (on viability for example). It is understood that, as an emerging policy area, there is little or no experience that can be cited to aid in understanding the effectiveness of the proposed policy and it is not clear how all the criteria will be enforced. The Trust suggests some continued joint working and monitoring of this policy to better understand how it will work in practice, and potentially the option to review it during the plan period if necessary.
- 6.8 The Trust recognises that the proposed policy could be a means to assist with addressing shortfall of housing for OUH staff – in particular as part of the Trust’s own masterplans – and the objective and policy is therefore supported.

## 7.0 POLICY H10: LINKING THE DELIVERY OF NEW/REDEVELOPED AND REFURBISHED UNIVERSITY ACADEMIC FACILITIES TO THE DELIVERY OF UNIVERSITY PROVIDED RESIDENTIAL ACCOMMODATION

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

7.1 The Trust acknowledges the City Council's desire to reduce the stress on the housing market that short-term letting by students can cause. There could be opportunities across the Trust's sites to provide some student accommodation and this can be explored through the masterplanning process.

7.2 It is noted, however, that there are controls in the proposed policy but very few positive actions or allocations are directly referenced. The City Council has identified this problem but has not articulated a coherent strategy to solve it: without specific (indicative) numbers and/or site allocation policies, the City Council has no means by which to demonstrate that its strategy is achievable and effective or indeed to monitor progress.

7.3 The Trust's view is that the City Council should consider an 'additional modification' that sets out the positive strategy that is implicit in the Local Plan to identify the scale of need and then allocate sufficient University and College sites, with some flexibility to meet that need. The Trust would welcome a conversation about such provision that could lead to considering opportunities through the masterplanning process. The suggested additional modification could be added to the supporting text, and is therefore not considered to be a matter of soundness.

## 8.0 POLICY E1: EMPLOYMENT STRATEGY

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

8.1 The Trust supports Policy E1. The aspiration to protect and make the best use of existing employment sites is a particular positive for the Trust given the importance of the three hospital sites to the city in terms of the number of people employed and the services provided.

8.2 The Trust notes and welcomes the intended policy drive towards promoting intensification on existing employment sites, which aligns with the Trust's own aspirations as set out in the OUH Masterplan.

**9.0 POLICY G3: PROVISION OF NEW GREEN AND BLUE FEATURES – URBAN****GREENING FACTOR**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

9.1 Policy G3 introduces the Urban Greening Factor which sets out that the development of sites should achieve a minimum score or no reduction in the green factor, calculated from the types of green infrastructure found on site using a formula set out in the appendices of the draft plan.

9.2 The Trust recognises the value and need for green space in urban areas, and generally supports the principle of trying to protect and enhance green space where possible. There is a lack of balance in the proposed policy however, which omits the opportunity to properly consider the development of some redundant green spaces or how the *requirements* of the policy are considered alongside the further *requirements* of Policy G4 - Biodiversity Net Gain (BNG).

9.3 The Trust notes that the Urban Greening Factor (UGF) is currently proposed alongside biodiversity net gain but suggests a 'simpler' output. The Trust questions whether this additional layer of calculation is required, and also highlights the significant risk of 'double counting' where an applicant might well be asked to provide UGF, and BNG and prove that both calculations result in a positive output. Whereas, in reality, something provided for UGF – e.g., a tree – will of course have a value in BNG. The overlap between the two calculations needs to be acknowledged in the Plan, and it must be set out how this will be managed through the planning application process.

9.4 Furthermore, the Trust notes that where UGF has been introduced elsewhere (in London) this tends to have been prior to the introduction of the minimum biodiversity net gain requirements in Local Plans.

9.5 This policy is not effective and has significant overlap with the requirements of G4 (but without the flexibility in Policy G4 to provide off-site mitigation).

***Necessary modification***

9.6 The Trust suggests that the Council gives serious thought to the operation of Policy G3, and how it overlaps with G4.

9.7 The Council must set out in policy, or supporting text, how UGF and BNG calculations will work in practice, and how an allowance will be made to count the multiple benefits of green assets both in 'greening' and in 'biodiversity' (and all the other public benefits that they bring). Perhaps this policy would be better framed considering types of urban greening, and how to deliver them in innovative ways, rather than a stark calculation which is required in the following policy.

9.8 Alternatively, the Council could consider deleting Policy G3 from the Plan, as it is currently performing a very similar function to G4.

**10.0 POLICY G4: DELIVERING MANDATORY NET GAINS IN BIODIVERSITY**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

10.1 The Trust supports Policy G4 and recognises the need to deliver BNG in its relevant planning and development projects. The Trust welcomes the approach set out in G4 and the flexibility to deliver BNG ‘off-site’.

10.2 The Trust reiterates here, its concerns regarding the potential ‘double counting’ between BNG and UGF. The Council must set out how the two *requirements* will work in practice, if both policies are to remain in the Plan.

**11.0 POLICY R1: NET ZERO BUILDINGS IN OPERATION**

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

11.1 The Trust has some concerns about the effectiveness and operation of proposed Policy R1.

11.2 There is a significant difference between the requirements in the extant Local Plan, and those which are now proposed. It is unclear if the Council has fully considered the resource implications of the range of new surveys and reports which are set out in the policy, and the effect that this may have on efficient decision making. The Trust notes the removal of BREEAM standards from the proposed policy, which it considers to be a retrograde step, because BREEAM is a well understood ‘standard’ and development have been delivered which meet and exceed its requirements. The Council should consider retaining its inclusion in some form, if only as a guidance for applicants seeking to meet new standards.

11.3 The Trust is concerned that the criteria set out in Policy R1 are not sufficiently flexible to consider the needs of specific types of employment building – especially health care, and research. The Council cannot seek to cannot put limits on safety which might require energy intensive equipment, high fresh air rates and significant cooling requirements. Such limits may also be a risk to innovation.

11.4 We have not been able to ascertain the evidence which has underpinned the proposed policy, and particularly if it has had regard to local circumstances and local employment building stock, and/or employment needs and aspirations.

**Necessary modification**

11.5 The Trust suggests that the policy should be more flexible to account for the range of uses and employers in the City, and the future needs and aspirations of businesses, especially in the health, and science sectors.

**12.0 POLICY R2: EMBODIED CARBON IN THE CONSTRUCTION PROCESS**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

12.1 The Trust raises no objection with the principle of proposed Policy R2, and it recognises the need to manage embodied carbons.

12.2 The Trust welcomes the fact that there are no 'targets' introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, the Trust suggests that the operational needs of businesses and employers should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weight in favour of its removal.

**13.0 POLICY SPE6: CHURCHILL HOSPITAL**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

13.1 The Trust supports the principle of allocating the Churchill Hospital through Policy SPE6. The Trust's aim is to create a comprehensive, modern and vibrant hospital on the Churchill site combining care, teaching and research at high density. As the City Council is aware, the Trust is working on a masterplan for the site. The Trust welcomes the formal recognition of the masterplan in the proposed policy. The benefit of formally recognising the masterplan is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site.

13.2 The Trust notes that the policy is relatively long, and that it repeats and cross references many other proposed policies in the Local Plan. Whilst the Trust does not object to this approach to policy writing, it seems unnecessary repetition.

13.3 Notwithstanding the concern about unnecessary repetition, the Trust makes the following observations:

***Potential development on the site***

13.4 The Trust welcomes the diversity of opportunities which the policy supports including hospital uses, and a range of accommodation types. This reflects the potential future development uses for the site which the Trust has previously discussed with the Council.

***Open space, nature, and flood risk***

- 13.5 The Trust recognises the constraints listed in the policy – including the Lye Valley SSSI – and is confident that all the matters can be managed and mitigated where necessary.

#### **Urban design and heritage**

- 13.6 The Trust has no concerns regarding the design guidance proposed in the Policy. High quality design is at the heart of the Trust’s masterplan for the site, and the consolidation of buildings is part of the masterplan consideration process.
- 13.7 The Trust is concerned that the Council continues to seek the “rationalisation” of parking, without providing a useable and high-quality alternative – and it is disappointing to see this guidance included in the design section, and not explicitly in the following “movement and access” section. A more transparent policy for car parking would be preferred.
- 13.8 The Trust is concerned that there is a reference in the proposed Policy to non-designated heritage assets. The Trust has no record of buildings on the Churchill site being included on the City Council’s Local List of heritage assets, and a search of the online database does not reveal any further details. It is therefore suggested that this reference is removed from the policy text.
- 13.9 Finally, Roman archaeology will be managed as appropriate through the development of the site.

#### **Movement and access**

- 13.10 The Trust has no concerns regarding the guidance in this section of the Policy and will continue to work on its promotion of active travel, and public transport alternatives, especially for staff and healthy visitors. However, it must be recognised that many patients who travel to hospital sites have no alternative to using a private vehicle.
- 13.11 The Trust notes a typographical error in this section of the policy: “mitigates against.” The word against should be deleted.

#### **Natural resources**

- 13.12 The Trust recognises the constraints listed in the policy and is confident that all the matters can be managed and mitigated where necessary.

### **14.0 POLICY SPE7: NUFFIELD ORTHOPAEDIC CENTRE (NOC)**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 14.1 The Trust supports the principle of allocating the Nuffield Orthopaedic Centre (NOC) through Policy SPE7. The Trust’s aim is to create a comprehensive, modern and

vibrant hospital on the NOC site combining care, teaching and research at high density. As the City Council is aware, the Trust is working on a masterplan for the site. The Trust welcomes the formal recognition of the masterplan in the proposed policy. The benefit of formally recognising the masterplan is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site.

14.2 The Trust notes that the policy is relatively long, and that it repeats and cross references many other proposed policies in the Local Plan. Whilst the Trust does not object to this approach to policy writing, it seems unnecessary repetition.

14.3 Notwithstanding the concern about unnecessary repetition, the Trust makes the following observations:

***Potential development on the site***

14.4 The Trust welcomes the diversity of opportunities which the policy supports including hospital uses, and a range of accommodation types. This reflects the potential future development uses for the site which the Trust has previously discussed with the Council.

***Open space, nature, and flood risk***

14.5 The Trust recognises the constraints listed in the policy – including the Lye Valley SSSI – and is confident that all the matters can be managed and mitigated where necessary.

***Urban design and heritage***

14.6 The Trust has no concerns regarding the design guidance proposed in the Policy. High quality design is at the heart of the Trust's masterplan for the site.

14.7 Roman archaeology will be managed as appropriate through the development of the site.

***Movement and access***

14.8 The Trust questions the need to reference the consolidation of parking in the policy, and it is odd to read about landscaping in this section of the policy which would be better suited to promoting active travel where feasible.

***Natural resources***

14.9 The Trust recognises the constraints listed in the policy and is confident that all the matters can be managed and mitigated where necessary.

**15.0 POLICY SPE20: JOHN RADCLIFFE HOSPITAL**

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

15.1 The Trust supports the principle of allocating the John Radcliffe Hospital site through Policy SPE20. The Trust's aim is to create a comprehensive, modern and vibrant hospital on the site combining care, teaching and research at high density. As the City Council is aware, the Trust is working on a masterplan for the site. The Trust welcomes the formal recognition of the masterplan in the proposed policy. The benefit of formally recognising the masterplan is that it clearly demonstrates the partnership working between the City Council and the Trust to support well planned and comprehensive development of the site.

15.2 The Trust notes that the policy is relatively long, and that it repeats and cross references many other proposed policies in the Local Plan. Whilst the Trust does not object to this approach to policy writing, it seems unnecessary repetition.

15.3 Notwithstanding the concern about unnecessary repetition, the Trust makes the following observations:

***Potential development on the site***

15.4 The Trust welcomes the diversity of opportunities which the policy supports including hospital uses, and a range of accommodation types. This reflects the potential future development uses for the site which the Trust has previously discussed with the Council.

***Open space, nature, and flood risk***

15.5 The Trust recognises the constraints listed in the policy – predominantly the need to manage water drainage on the site – and is confident that all the matters can be managed and mitigated where necessary.

15.6 The Trust is concerned that the Council continues to seek the “rationalisation” of parking, without providing a useable and high-quality alternative. This matter is returned to under movement and access below.

***Urban design and heritage***

15.7 The Trust has no concerns regarding the design guidance proposed in the Policy. High quality design is at the heart of the Trust's masterplan for the site.

15.8 The Trust acknowledges that the site is located adjacent to the Old Headington Conservation Area and contains the Grade II listed Manor House. The Trust is committed to bringing forward a high-quality scheme for the John Radcliffe Site that is wholly consistent with the ‘desirability’ of conserving and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation (NPPF 2023, para 203).

**Movement and access**

15.9 The Trust has concerns about specific reference to seeking to reduce car parking on all hospital sites. The Trust continues to manage a large number of complaints about access to, and parking on, the John Radcliffe site and indeed the queuing traffic that this creates. It is considered unrealistic to expect private travel to reduce by simply removing parking provision without complimentary strategies. Additionally, parking provision for private travel by electric vehicles – especially in the medium term – is considered likely to be needed, even if traditional internal combustion motor vehicles may reduce in popularity.

15.10 The Trust considers that the transport issues can only be resolved, and parking reduction considered, with adequate alternative transport measures in place.

**Natural resources**

15.11 The Trust recognises the constraints listed in the policy and is confident that all the matters can be managed and mitigated where necessary.

**16.0 CONCLUSION**

16.1 The Trust considers the Local Plan to be generally sound. There are, however, some detailed elements of the Plan – as explained through the detailed submissions – that are necessary to modify to ensure that:

- a) the plan is positively worded;
- b) the policies are justified;
- c) the policies are effective; and,
- d) the Plan conforms to national policy

16.2 The Trust hopes that the comments are useful to the City Council and welcomes continued positive joint working on the vision for the OUH sites. This will ensure that the objectives the Trust and of the Local Plan can be delivered in a comprehensive and effective way.

**17.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION**

17.1 The Trust confirms that it does wish to take part in the oral part of the Local Plan examination. This is to be able to fully explain the concerns about the policy drafting and to answer questions that the Inspector might have.

17.2 The Trust also considers it important to share the vision for the OUH sites and provide confidence as to their deliverability.