

# Chapter 3 - A Prosperous City with a Globally Important Role in Learning

## Contents

Chapter 3 - A Prosperous City with a Globally Important Role in Learning .....	1
Contents.....	1
Headlines for Chapter 3: .....	1
Short questionnaire responses .....	2
All Public Responses - Draft Policy E1.....	5
Statutory Consultee Responses – Draft Policy E1.....	40
All Public Responses – Draft Policy E2 .....	47
Statutory Consultees – Draft Policy E2 .....	53
All Public Responses – Policy E3 .....	55
Statutory Consultees – Draft Policy E3 .....	63
All Public Responses – Policy E4 .....	65
Statutory Consultees - Draft Policy E4 .....	74
All Public Responses – Draft Policy E5 .....	75
Statutory Consultee - Draft Policy E5 .....	88
All Public Responses to the Whole of Chapter 3 .....	89

### Headlines for Chapter 3:

- ELNA – general support for policy
- Employment land should not be competing with land needed for housing
- Employment land should be competing with existing infrastructure
- General support for housing on employment sites
- General support for Community Employment Procurement Plans (CEPP)
- Clarification around what affordable workspaces means
- Numerous commentaries around developing derelict buildings and old office space
- Minor commentary disagreeing with proposed policies

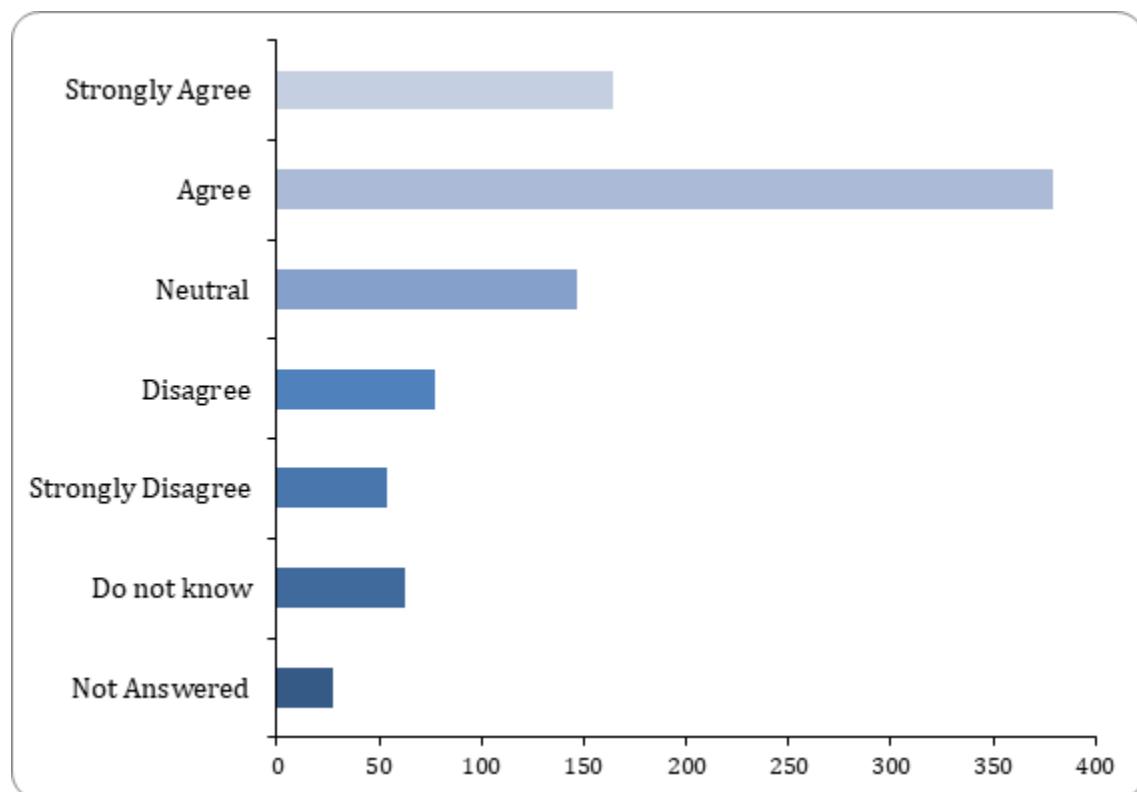
## Short questionnaire responses

### Employment Sites

We have identified what we think are key employment sites in the city that we should protect. These are sites that support Oxford's internationally important role in education, research and health, and also those that support a diverse and strong economy. We are not protecting any employment sites in the city centre or district centres, to give full flexibility in those areas, for example to allow for offices to change use to housing.

To what extent do you agree with this approach?

There were 884 responses to this part of the question.



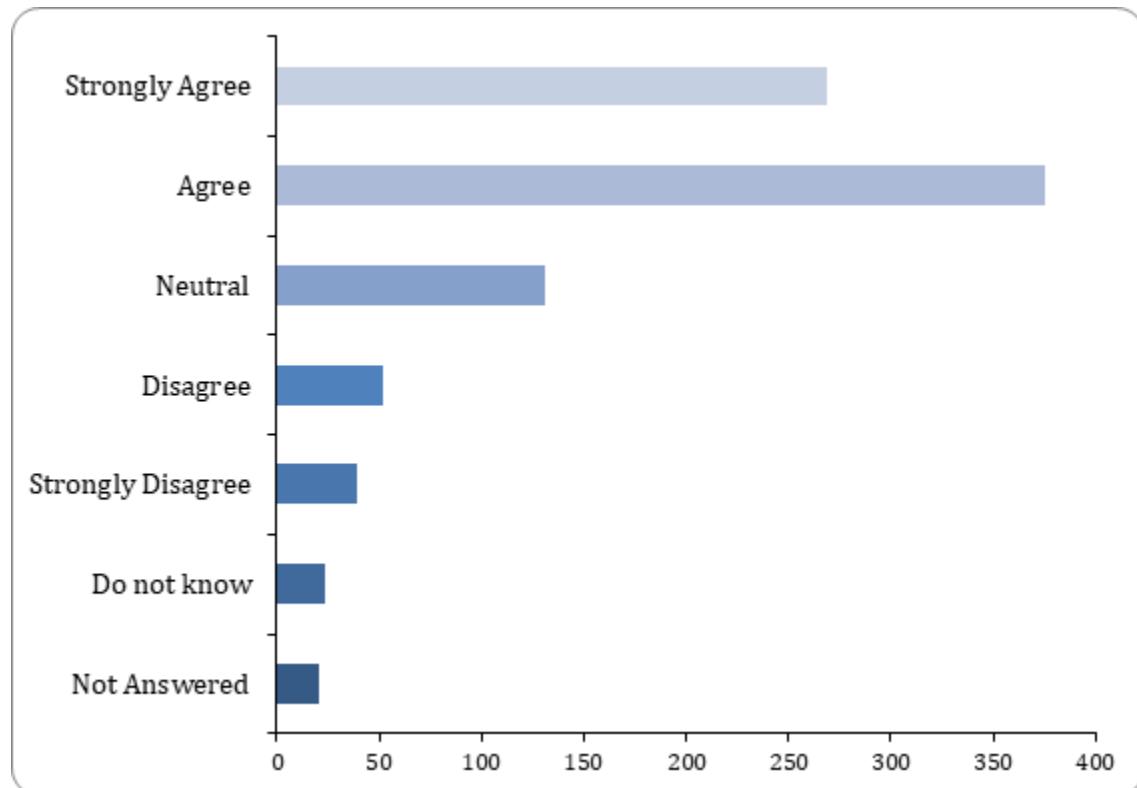
Option	Total	Percent
Strongly Agree	164	18.00%
Agree	379	41.60%
Neutral	147	16.14%
Disagree	77	8.45%
Strongly Disagree	54	5.93%
Do not know	63	6.92%
Not Answered	27	2.96%

## CEPPS

We propose requiring community employment plans so that work and training opportunities are given to local people.

To what extent do you agree with this approach?

There were 890 responses to this part of the question.



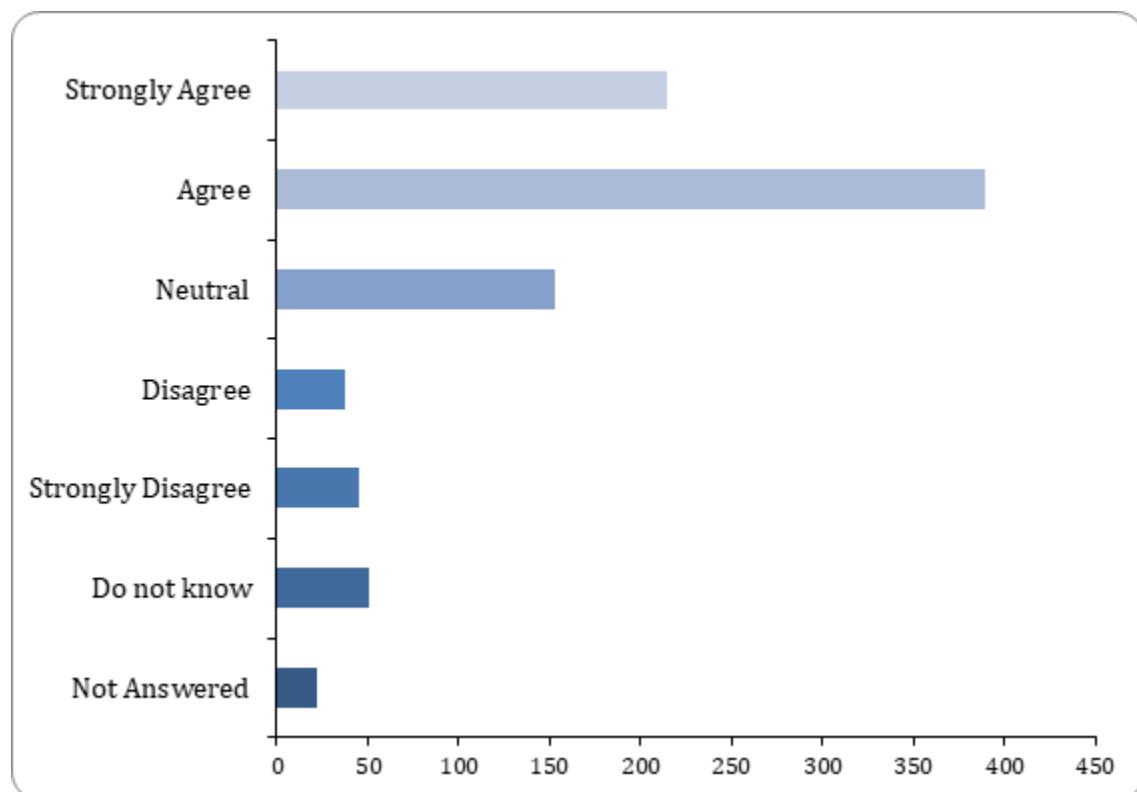
Option	Total	Percent
Strongly Agree	269	29.53%
Agree	375	41.16%
Neutral	131	14.38%
Disagree	52	5.71%
Strongly Disagree	39	4.28%
Do not know	24	2.63%
Not Answered	21	2.31%

## Affordable workspaces

Affordable workspace is proposed as a new policy approach- the largest key employment sites will be expected to deliver an affordable workspace strategy, to ensure a range of employment types and businesses.

To what extent to you agree with this approach?

There were 889 responses to this part of the question.

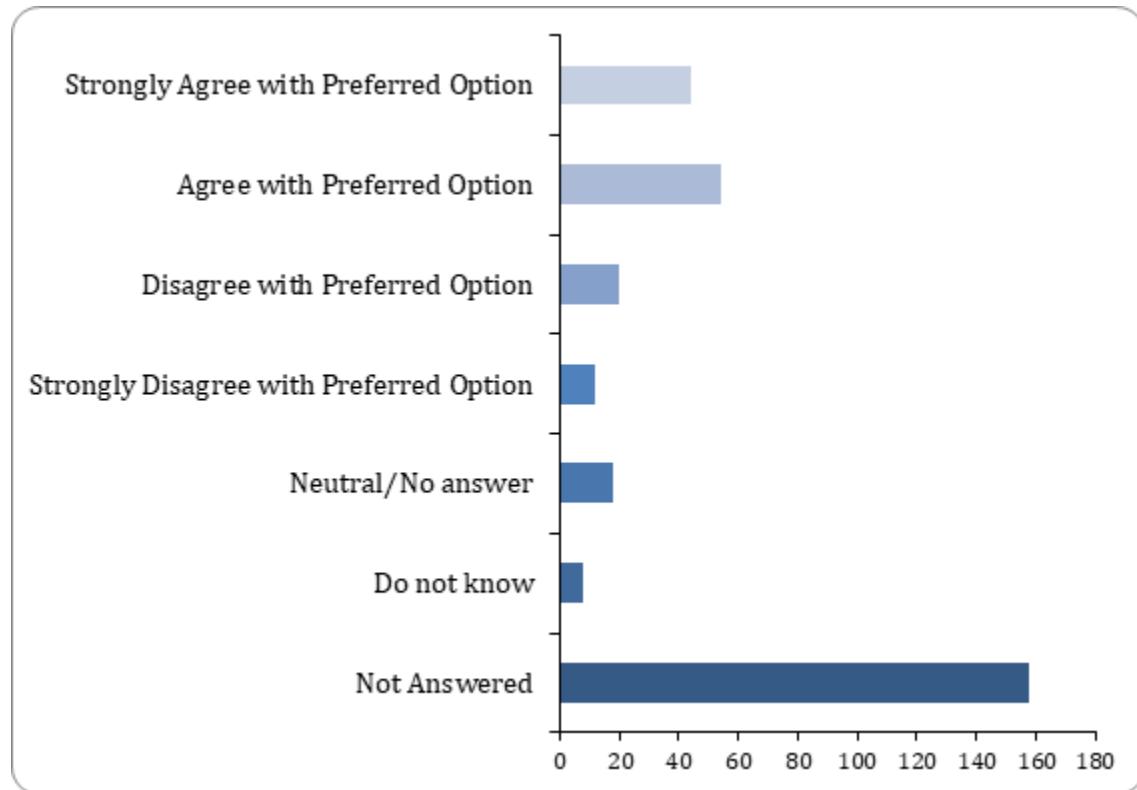


Option	Total	Percent
Strongly Agree	214	23.49%
Agree	389	42.70%
Neutral	153	16.79%
Disagree	37	4.06%
Strongly Disagree	45	4.94%
Do not know	51	5.60%
Not Answered	22	2.41%

## All Public Responses - Draft Policy E1

Please tell us what you think about policy options set 004a-1 (draft policy E1): Addressing Employment Land Needs. If you have any additional comments please put them in the comment box below.

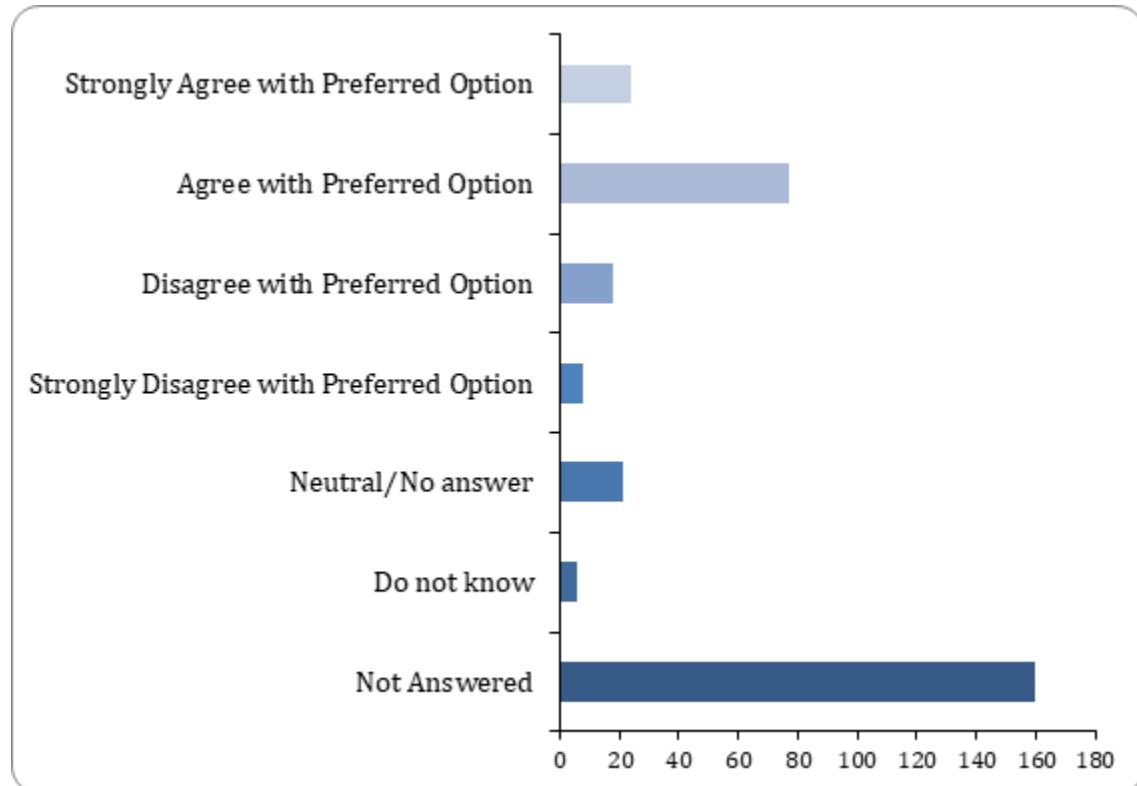
There were 156 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	44	14.01%
Agree with Preferred Option	54	17.20%
Disagree with Preferred Option	20	6.37%
Strongly Disagree with Preferred Option	12	3.82%
Neutral/No answer	18	5.73%
Do not know	8	2.55%
Not Answered	158	50.32%

Please tell us what you think about policy options set 004a-2 (draft policy E1): Making the best use of employment sites. If you have any additional comments please put them in the comment box below.

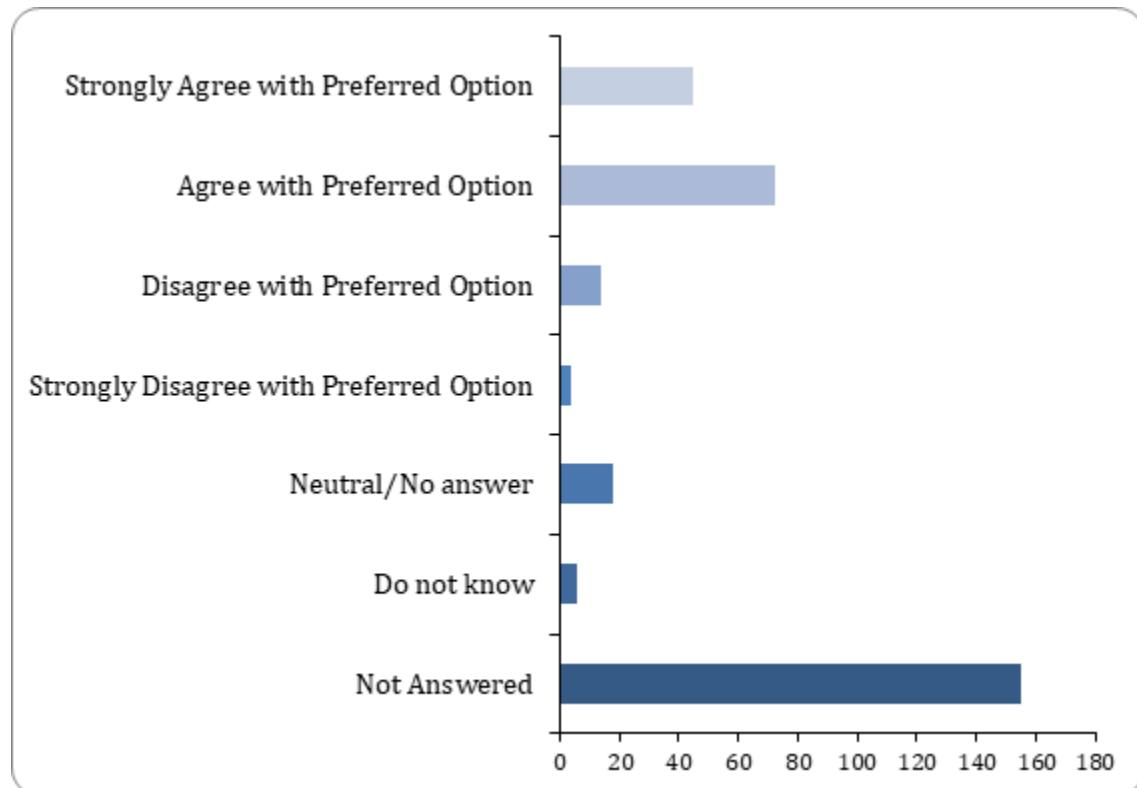
There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	24	7.64%
Agree with Preferred Option	77	24.52%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	8	2.55%
Neutral/No answer	21	6.69%
Do not know	6	1.91%
Not Answered	160	50.96%

Please tell us what you think about policy options set 004a-3 (draft policy E1): Housing on Employment Sites. If you have any additional comments please put them in the comment box below.

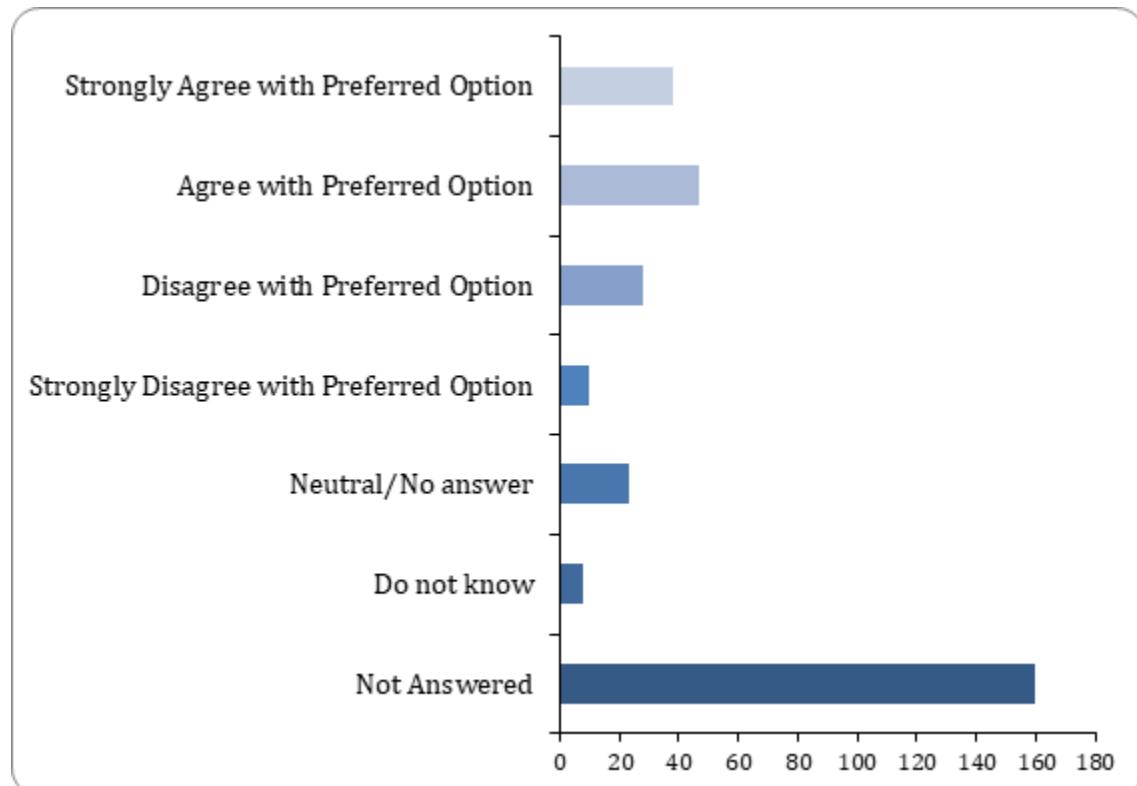
There were 159 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	45	14.33%
Agree with Preferred Option	72	22.93%
Disagree with Preferred Option	14	4.46%
Strongly Disagree with Preferred Option	4	1.27%
Neutral/No answer	18	5.73%
Do not know	6	1.91%
Not Answered	155	49.36%

Please tell us what you think about policy options set 004a-4 (draft policy E1): Location of New Employment Uses. If you have any additional comments please put them in the comment box below.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	38	12.10%
Agree with Preferred Option	47	14.97%
Disagree with Preferred Option	28	8.92%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	23	7.32%
Do not know	8	2.55%
Not Answered	160	50.96%

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	Support	<p>We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as Oxford North, are the best locations for intensification of employment uses to meet employment needs.</p> <p>ONV support the preferred option of seeking to maximise existing employment sites to ensure that best use is made of those allocated, to meet employment needs. Supporting the intensification of the city's existing key employment sites will enable employment land needs to be met on existing sites where successful clusters can be established.</p> <p>ONV notes the proposed provision of housing on non-designated employment sites. This is recognised as being a potential source of housing numbers supporting the Council's ability to meet housing need. Oxford North is a mixed-use site and the land uses identified include residential development and commercial/employment development. The site allocation policy for Northern Gateway/ Oxford North has not yet been released however, this should allow for flexibility over the location of the uses</p>	<p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>within the allocation to ensure that development can respond to market demand.</p> <p>We strongly support the preferred option of supporting new employment uses through intensification at existing employment sites and sites specifically allocated for employment uses in the plan. This option would not allow any new employment-generating uses outside of these locations and we support employment needs being directed to existing employment sites.</p>	Support noted.
E1	Support – ARC Oxford	<p>We support the preferred option to attempt to meet employment needs, while balancing other uses, in particular housing. We consider that designated employment sites, such as ARC, are the best locations to support intensification of employment uses to meet employment needs.</p> <p>We support the preferred option of seeking to meet employment land needs through appropriate modernisation and intensification of the city's existing employment site network, which would include ARC.</p> <p>Supporting modernisation and intensification of the city's key employment sites will enable employment land needs to be met on existing</p>	Support noted.  Support noted.  Support noted.

Draft policy	Topic	Summary of comments	Response
		<p>sites through a mixture of refurbishment of existing buildings and new build development.</p> <p>RLMIS has no plans at this time to deliver housing on its site at ARC, but recognises housing is a key locational consideration for companies. There could be scope for allowing some housing on employment sites provided it supports their economic function. Where there is scope to deliver housing on other key employment sites in the City, we support the preferred option to allow an element of housing delivery on existing employment sites (subject to other policy requirements being met).</p> <p>We strongly support the preferred option of supporting new employment uses (through modernisation and intensification) at existing employment sites and sites specifically allocated for employment uses in the plan only. This option would not allow any new employment-generating uses outside of these locations and therefore support employment needs being directed to existing employment sites, such as ARC Oxford.</p>	<p>Conditional support noted.</p> <p>Support noted.</p>
E1	Support for policy	The [OUH] Trust supports Policy E1, and the continued identification of its hospital sites as 'Key Employment Sites' at Appendix 3.1.	Support noted.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		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.	Support noted.
E1	Support – Suggested wording	<p>It is supported that emerging policy E1 considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace.</p> <p>It is suggested with respect to the initial paragraph of the draft policy that it is updated to 'All new development for employment purposes...' as opposed to 'All new development on employment sites'. It is understood that the sentiment of the first paragraph is applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.</p>	<p>Support noted.</p> <p>The city's employment sites include hospitals, teaching and research campuses, and sites allocated for a range of employment generating uses. It is important that the key principles outlined in the first paragraph of Policy E1 are applied uniformly across the city's diverse network of employment sites rather than restricting their application to development for "employment purposes" (an undefined term).</p>
E1		The Group supports the flexibility in the draft policy, which protects the most important 'key' employment sites, whilst also allowing for their intensification including complementary housing to create mixed use sites.	Support noted.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>Given the scale of the City's housing requirement, it is right that all options should be considered, including employment sites. However, in those circumstances where employment sites (either in whole or part) are given over to other uses, it is essential that there remains sufficient employment land for the economic potential of Oxford to be fully realised.</p>	<p>The policy includes criteria to ensure that, even where a loss of employment floorspace is proposed at Key Employment Sites, the employment use can be retained and the number of jobs in employment generating uses are retained.</p>
E1	Greater flexibility needed to align with NPPF	<p>The Universities welcome the latest evidence presented in the 'Oxford City – Employment Land Needs Assessment Interim Report' (June 2025), which is generally more aligned to the data submitted within the Universities' representations during the last round of plan-making.</p> <p>However, the Universities consider that greater flexibility is needed on the list of permissible locations for new employment uses and clarification is needed on what defines an 'employment site'. Currently, the preferred options for Policies S1 and E1 collectively seek to direct new employment land to existing employment sites whilst prioritising housing elsewhere.</p> <p>However, in the absence of a definition of 'employment site', the policy poses a potential</p>	<p>Noted.</p> <p>Given the city's well-publicised inability to meet housing need (standard method, NPPF, Dec 2024) and widely acknowledge barrier to economic growth that this brings, coupled with the very healthy "demand-led"</p>

Draft policy	Topic	Summary of comments	Response
		<p>barrier to the development of employment uses on certain redundant brownfield sites which may lend themselves to employment-generating uses.</p> <p>Furthermore, the Universities consider that in their current guise, Policies E1 and S1 risk conflict with the overarching vision of the Local Plan to support Oxford's international standing for research and development. Reflecting Paragraph 68 of the NPPF ("the Framework"), which required policies to be "be flexible enough to accommodate needs not anticipated in the plan", it is suggested that a sequential approach could be added to the policy, to enable new employment generating uses where they would not undermine other priorities of the plan.</p>	<p>employment land supply position puts the city in a strong position to meet all identified employment land needs in the plan-period. The plan's strategy to support new sites for housing is therefore critical to the further economic success of the city.</p> <p>The Reg. 19 plan will provide clear definitions of employment sites and appropriately sub-categorise them.</p> <p>While supporting Oxford's key economic strengths forms part of the overarching vision for the plan, delivering new homes in the city is a key priority as well. Given the brownfield and strategic greenfield opportunities that remain undeveloped across the city's network of Key Employment sites, we consider there is sufficient flexibility to accommodate any employment needs not anticipated by the plan. However, as stated previously, as Oxford is unable to meet currently identified housing need, the plan's overarching strategy (S1) and employment strategy (E1) provide clear support for economic growth by seeking to reduce its barriers, which include housing affordability issues.</p> <p>Noted – see above.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		Whilst this option is not considered within Background Paper 004, such an approach would achieve an appropriate balance between land use pressures, ensuring the Plan conforms to the Framework.	
E1	Support draft policy preferred option over alternatives.	The policy is supported. Although the policy appears to be supportive of a range of employment land uses, it doesn't reference the nature/type of acceptable uses and should ensure that it is responsive to market demands to allow for the delivery of employment types in accordance with the needs of the local market.	The policy supports "employment generating uses" defined in the appendix. A specific policy is included for B8 uses as these often have bespoke requirements/needs etc.
E1	Clarification suggested	<p>Policy E1 seeks to support and protect employment uses. However, it supports the loss of employment uses on sites that are not designated for employment uses, and where housing is proposed.</p> <p>It also supports the provision of housing on designated sites, taking a balanced judgement approach where the employment function of the designated site is not harmed.</p> <p>In both these circumstances it would be helpful if the policy said that student or co-living types of housing are supported. Both types meet housing needs (in terms of the NPPF and NPPG), and it might be that such housing types are</p>	<p>Noted.</p> <p>Noted.</p> <p>Policy E1 does not specify the type of residential development that should be come forward. As the acceptable locations for student housing are covered elsewhere in the plan, it would not be appropriate to support them at all employment sites. The policy therefore provides a general support for residential development and does not specify precise types.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		more appropriate alongside employment uses than conventional housing.	
E1	Policy should go further	<p>We welcome the proposed more flexible approach to the use of employment sites for housing, but as indicated above in relation to policy H1, we think this could go further.</p> <p>The policy should explicitly recognise that creating new employment opportunities also creates additional housing need that cannot be accommodated within the city, adding to congestion and carbon emissions.</p> <p>The city already has significantly more jobs than residents of working age so the provision of new homes should be prioritised over employment.</p>	<p>Support noted.</p> <p>This Local Plan uses the Government's Standard Method (NPPF, Dec 2024) to calculate housing need. The plan does not allocate any additional sites for employment purposes.</p> <p>The plan's strategy seeks to promote housing and limits new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class.</p>
E1	Objection	<p>The policy is unjustified as there is no provision for extra employment to provide extra housing, only permission to do so.</p> <p>The relentless expansion of the OUHT, the Universities and associated research centres is the primary driver of housing need in the city, but E1 permits expansion with no contribution to housing. If a business wants to downsize and allocate space for housing, this is specifically prohibited, which is unjustified.</p>	<p>The policy sets out a permissive approach to housing delivery across the city's employment site network. Where relevant, site allocation policies provide minimum housing numbers.</p> <p>Policy E1 allows the loss of "existing employment sites not designated as Key Employment sites" to other uses, while actively supporting their loss to housing.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		Work from Home leads to reduced need for space with different workgroups having office days on different days of the week. This is an economic decision taken by the employer. OCC has no role in this.	While it is noted that working from home can reduce premises needs for certain sectors, other sectors (e.g., manufacturing/ research & development often cannot operate successfully without the workforce being present on site.
E1	Policy as written not effective	<p>Hallam does not support the proposed employment strategy due to its failure to identify clear requirements for employment land and how or where needs will be met.</p> <p>The preferred option is based on a criteria-based approach that seeks to focus and intensify development at existing employment sites and city and district centre locations whilst resisting development resulting in the loss of floorspace at key employment sites.</p> <p>A more effective employment land strategy is required. It should quantify employment land and floorspace requirements, express the spatial priorities where provision can be made and ensure flexibility for the market and growth in current and emerging sectors.</p>	<p>Employment land needs evidence will be consulted on at the next statutory consultation stage (Reg.19).</p> <p>Noted.</p> <p>The City Council is confident that the employment land strategy, which supports the modernisation and intensification of existing employment sites will be sufficient to meet identified land needs and ensure flexibility for market growth in current and emerging sectors, while addressing key barriers to economic growth, i.e., lack of housing and infrastructure.</p>
E1	Suggested amendment	CPRE have repeatedly called for some development on various sites listed as Key Employment Sites many of which have sat empty for decades.	Noted.

Draft policy	Topic	Summary of comments	Response
		<p>The worst examples, being the Osney Industrial Estate and the Unipart site but there are many others.</p> <p>For example, there are still empty sites available on the old British Leyland site at ARC Oxford dating from the 1990's and representing now 30 years of being effectively Brownfield sites. If there is no real expectation that these sites will be actively developed, then protecting them as Employment sites makes no sense.</p> <p>The City Council have singularly failed to deal with this issue claiming quite wrongly that Oxford is full. Ignoring Osney Mead and the many other vacant sites in Oxford. In CPRE's view the draft Policy should state that:</p> <p><i>"if a site or part thereof has not been used for substantive employment purposes for a period of 10 years or more then it shall not be subject to the Proposals involving housing listed in the Employment strategy and be subject to normal planning requirements for housing development. Car or commercial vehicle storage/ parking would not be regarded as substantive employment. In relation to smaller</i></p>	<p>Neither Osney Mead Industrial Estate nor the "Unipart" site, are completely vacant. Both are long-standing site allocations and are actively in use for a range of employment purposes.</p> <p>There is 3ha of vacant land at ARC Oxford (without planning consent). Discussions with all landowners suggest that they are keen to bring forward development at their sites within the plan period.</p> <p>We do not accept this modification. Storage and distribution uses are a recognised employment-generating use under the Use Classes Order. The plan provides a permissive approach to housing on employment sites.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>

Draft policy	Topic	Summary of comments	Response
		<p><i>developments (formerly Category 3 sites) the suggested proposals should not apply."</i></p> <p>Further owners should pay enhanced business rates if they fail to redevelop vacant sites.</p>	
E1	Clarification sought.	<p>Draft policy allows for housing to be supported on employment sites where the objectives of the policy are met. Policy E1 differs from that in the adopted local plan (and previous 2040 plan) in that it only proposes two categories of employment site – Key Employment Sites and non-designated employment sites.</p> <p>However, there appears to be no mechanism in the LP42 to change category outside of a review of the Local Plan. It is therefore suggested that a mechanism is provided in the LP42 to review the categorisation of employment sites on an annual basis and update the list within Appendix 3.1 of the Plan.</p> <p>Conflict between the wording in the policy - states that “planning permission will be granted for the loss of any non-designated employment sites to other uses, proposals for housing will be supported” and the section relating to housing which sets out a number of criteria to meet where housing is proposed, including –</p>	<p>Noted.</p> <p>That is correct. As part of the plan-making process, existing employment sites (over 0.25ha) were assessed against specific criteria. We do not propose to undertake this assessment annually.</p> <p>We do not consider that this is a conflict. The policy is clear that for existing employment sites not designated as Key Employment Sites, that housing, in principle will be supported, however, the objectives set out parts c-h) of the policy need to be assessed by the decision-maker.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		“avoiding the loss of or significant harm to, the continued operation or integrity of successful and/or locally useful, business and employment sites”. Who determines the above is also a concern, as all employment sites are locally useful? These conflicts should be clarified.	Preferred Option selected for reasons set out in Background Paper.
E1	Support	Support identification of ARC Oxford as a ‘Key Employment Site’ (Appendix 3.1)	Support noted.
E1	Wider contextual comment	Oxford remains the most sustainable location for employment in the county. The continued intensification, regeneration and modernisation of ARC Oxford can meet that demand and support local, regional and national economic growth.	Support noted.
E1	Housing on Employment sites	ARC does not object to the newly introduced principle that housing (in the future, where justified) could be realised on the site.	Lack of objection noted.
E1	Other uses	In addition, ARC would support hotel or aparthotel uses.	Site allocation policies will set out appropriate uses for each site.
E1	Employment land needs	Get out of the property market.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Within the preferred option, require a clause to re-categorise existing commercial land to housing land or mixed use	Policy E1 enables housing to come forward at existing employment sites. Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Alternative Option 1 preferred Reasons include:	Preferred Option selected for reasons set out in Background Paper

Draft policy	Topic	Summary of comments	Response
		<ul style="list-style-type: none"> <li>- Employment drives prosperity which in turn will support housing and taxation</li> <li>- The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development.</li> </ul>	
E1	Employment Land Needs	<p>Request Alternative Option 1 is progressed to ensure employment needs are fully met within Oxford.</p> <p>Alternative Option 1, focusing on meeting all identified employment land needs within Oxford's boundary, is essential to sustaining the city's economic vitality and supporting its key sectors, particularly research and development, life sciences, and advanced manufacturing.</p> <p>The preferred option, which prioritises other uses such as housing even where employment needs cannot be fully met, risks undermining Oxford's long-term economic resilience. While we recognise the acute need for housing, this should not come at the expense of employment land that is critical to the city's innovation ecosystem and broader regional economy.</p>	<p>The lack of housing (and infrastructure) has often been cited as a barrier to economic growth in Oxford.</p> <p>The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs).</p> <p>Preferred Option selected for reasons set out in Background Paper</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		Alternative Option 1 offers a more balanced and proactive strategy. By actively investigating ways to meet employment land needs within the city, including the identification of new, appropriately located sites, it ensures that Oxford can continue to support high-value job creation, attract investment, and retain its competitive edge.	
E1	Employment Land Needs/ Best use of Employment sites	Alternative option 1 seems to provide some solutions. Given that working from home is so common nowadays, it is hard to understand the employment land needs in Oxford. Plus, lots of shops move to online, the council may consider how to maximise the use of unoccupied office sites. to balance such needs.	Preferred Option selected for reasons set out in Background Paper.  While working from home has become more common for certain sectors (e.g. traditional office workers), the type of employment land coming forward in Oxford (e.g., R&D), often requires the workforce to come into the workplace on a regular basis.
E1	Employment Land Needs	Support Alternative Option 2: (10) Reasons include: <ul style="list-style-type: none"><li>- It is more likely to succeed in the long term.</li><li>- Councils have a poor record of decision-making in this area.</li><li>- Stop intervening, let the market find the right balance.</li><li>- Let the market decide the most appropriate employment land</li><li>- Don't over-manage, let a thousand flowers bloom.</li></ul>	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<ul style="list-style-type: none"> <li>- Option two based on the existing framework is sufficient</li> <li>- Long live the market!</li> </ul>	
E1	Employment Land Needs	At present housing is the important thing but there should be no strict rule here. Helping the economy expand is important as well.	The policy supports the economy by not allocating new additional sites in employment-generating uses and allows employment sites to modernise and intensify to support the expansion of floorspace, without impacting further on Oxford's limited land availability.
E1	Employment Land Needs	I don't like the increase in business and science parks around the edge of the city. They should be better integrated with some kind of local infrastructure, including housing.	<p>Re: infrastructure - The plan supports the re-opening of the Cowley Branch Line to passenger services, which has recently (October 2025) been provided with £120m of Government funding to support it.</p> <p>New homes are proposed as part of strategic site allocations in neighbouring authorities to meet previously agreed unmet housing need.</p>
E1	Employment Land Needs	I don't really know what this means. We should be encouraging employers to locate in oxford, especially small business, entrepreneurs, and transforming the city centre from the tourist shop and takeaway desert it is now to a mosaic of independent shops.	The Reg.18 Plan included draft Policy E4 which is designed to support affordable workspaces for certain sectors. While Policy E1 itself supports a range of uses within the city and district centres.
E1	Employment Land Needs	I think a joint up approach is needed. We need jobs to contribute to public finances as well as good and safe housing.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Prioritising housing on employment sites will slow and complicate decision making around the evolution of employment in the city; which is tending towards densification, higher value uses,	The plan's strategy does not seek to prioritise housing on employment sites but rather to prioritise any new site allocations to support housing delivery. The Employment Strategy supports the modernisation and

Draft policy	Topic	Summary of comments	Response
		<p>and R&amp;D, often in uniquely suitable locations for this sort of economic growth. Adding the need to consider housing into decision making on the future needs of employers is unnecessary.</p> <p>In the past the City has co-operated with Cherwell on unmet housing needs. This will hopefully continue, but there is also an opportunity to co-operate on employment needs. For example, the Science North area, stretching from Oxford North and Oxford Parkway, through the University of Oxford's Begbroke Science Park, Oxford Technology Park and London Oxford Airport, is emerging as a strong rival to Science Vale in the south and as a further link along the Knowledge Spine stretching from Didcot to Bicester. There is, moreover, 4,400 homes for Oxford's unmet need committed in this location.</p> <p>In our Opinion, the spatial strategies in the Oxford Local Plan need to connect with and plan for Science North. This will provide for the housing and employment needs of the City, set a plan for the related infrastructure, all in a highly sustainable and market-aligned way. For example, Bloombridge is planning to submit the application for Phase 2 of Oxford Technology Park within the next 6 months - comprising</p>	<p>intensification of the city's larger "Key Employment Sites". Where losses of employment floorspace are proposed on "Key Employment Sites" certain criteria need to be met, while the loss of non-designated employment sites to other uses is allowed, Policy E1 supports housing at these sites.</p> <p>The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). Economic Evidence will be published at next consultation stage (Reg. 19) to confirm.</p> <p>Re: "Science North" - this is outside the city boundary and should be supported by appropriate infrastructure. The County Council is currently responsible for developing active and sustainable travel schemes and they should be involved with regards to any infrastructure linkages.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		approximately 90,000 sq m of technology, quantum and life sciences space, linked to the City via the excellent public and accessible transport infrastructure in this area.	
E1	Employment Land Needs	<p>Employment and housing should be equally prioritised as they go hand in hand</p> <p>Surely employment and housing provision are two sides of the same coin?</p> <p>Situations where mixed use if the appropriate solution?</p>	<p>The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs).</p> <p>Mixed-use sites will be appropriate in certain locations (e.g., city and district centres)</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Employment Land Needs	The University assumes that more is better, but in fact standards are slipping in some areas in the face of an obsession with growth.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Agree that priority should be given to the communal and social needs first, such as good housing and access to green spaces and community spaces.	Support Noted.
E1	Employment Land Needs	There's no point creating more employment if so many employees have to live outside Oxford.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Revise ideas for the Oxpens site in order to conform to this draft policy. Eg priority throughout this area for council/keyworker/self-	Having regard to national policy, the city and district centres are suitable for a wide range of uses including employment, retail, hotels and residential uses.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		build homes from existing empty built environment including above commercial units.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	<p>Oxford's global research clusters depend on a steady pipeline of modern labs, offices and light-industrial floorspace. Consciously favouring housing over employment whenever a trade-off arises would push high-value firms further from the city, lengthen commuting and erode the very wage growth that underwrites local prosperity. The draft Plan itself notes that demand for R&amp;D space is "being delivered at pace" and already commands premium rents city-wide; constraining supply will only magnify that pressure.</p> <p>The evidence base also recognises that existing employment sites can be "intensified significantly" and that brownfield retail parks such as Botley Road are naturally converting to laboratories under the new Class E rules. Rather than ration floorspace, the pragmatic course is to keep policy flexible: encourage vertical extension, allow mixed-use redevelopment of low-density plots, and let new sites come forward wherever they satisfy environmental and transport criteria.</p>	<p>The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs).</p> <p>Preferred Option selected for reasons set out in Background Paper</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		Alternative 2 does exactly that. By relying on clear, city-wide design standards and the normal NPPF tests, while lifting blanket locational bans, the Council can accommodate both jobs and homes, letting price signals direct land to its highest-value use. In a space-constrained city, the surest route to inclusive growth is to remove bottlenecks, not choose winners.	
E1	Employment Land Needs	I am not sure of the merits or otherwise of prioritising housing over employment needs. I would have thought it was important for employment to be available for people who live in the city but am not sure how these priorities interact.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	I don't think we need more employment at all. Oxford does NOT need growth, but it does need accommodation for those who are already here.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	This seems rather vague. Employment has been prioritised over housing over recent decades leading to significant proportion of workers commuting from well beyond Oxford boundaries.	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment needs).  Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	Note explicitly the need for the provision of housing to outpace the growth in housing	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		demand stimulated by new or densified commercial development.	
E1	Employment Land Needs	Put employment elsewhere where it is needed	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	We support the preferred option. We were pleased to see that this policy reflects the need for housing in Oxford to catch up with job provision.	Support noted.
E1	Employment Land Needs	<p>Increasing housing stock must be prioritised above developing new employment sites. Otherwise, planning policy will exacerbate the number of workers forced to live outside the city due to unaffordable housing.</p> <p>Although we welcome a more flexible approach to using employment sites to help deliver new housing, the provisions in Policy E1 and Appendix 3 remain overly restrictive. They offer only limited flexibility and continue to place excessive emphasis on maintaining high levels of employment.</p> <p>We encourage the council to monitor the job-to-bed ratio in the city and set out a plan and policies aimed at narrowing this gap.</p>	<p>Policy E1 does not allocate new employment sites and supports the modernisation and intensification of existing employment sites.</p> <p>It is important to protect Key Employment sites as they include a range of sites that support both the local and national economy.</p> <p>A monitoring framework will be produced to support the plan.</p>
E1	Employment Land Needs	There is no employment crisis in Oxford. Please take great care to prioritise housing where sustainable sites for increasing employment are proposed, instead of job-creation: 55,000 new	The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas able to meet employment needs).

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		workers can never be housed in the City and will simply make any lack of housing worse. I am opposed to calling on surrounding councils and green belt to take on construction projects to accommodate something that Oxford should not entertain.	Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs/ Best use of employment land	Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses	Local Plan already contains separate policies relating to academic institutions. Preferred Option selected for reasons set out in Background Paper
E1	Employment Land Needs	There is no point building more and more dwellings if there's nowhere for more and more people to work.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Allowing 'brownfield sites' for housing is eminently sensible.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Support Preferred Option Reasons provided include: <ul style="list-style-type: none"> <li>- To ensure a higher level of protection to employment sites, unless these sites are demonstrably poorly performing.</li> <li>- Yes, modernisation and retrofitting of existing spaces, and not using more land for employment purposes.</li> <li>- Oxford should concentrate protection on the core campuses and business parks that anchor its life-science and advanced-manufacturing clusters, while</li> </ul>	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>allowing tired, low-density sites in secondary locations to switch to higher-value uses; doing so unlocks land for much-needed homes, channels investment into modern multi-storey labs on the key sites, and prevents an inefficient blanket freeze that would trap obsolete sheds and offices in perpetuity—thereby maximising both job creation and housing delivery within the city's tight boundary.</p> <ul style="list-style-type: none"> <li>- I think important employment sites should be protected.</li> <li>- Support preferred option which focuses on increasing employment locations only through intensification and modernisation of existing sites.</li> <li>- I agree with allowing/ changing the loss of poorly performing sites to other priority uses e.g., housing. For example, the much-missed Co-operative Bank has been an eye-sore since before the pandemic.</li> </ul>	
E1	Best use of employment sites	Support rely solely on national planning policy.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	I disagree with all the options. More employment and growth is not going to benefit the life of those already in the city.	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	Best use of employment sites	Be flexible. Employment matters too	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	There is very little unemployment in Oxford.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	We note our concern that even intensification could lead to increases in housing need and thus add further pressure to the city's housing provision.	Housing need calculations are based on the Government's Standard Method (NPPF, Dec 2024). Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	<p>Draft Policy E1 sets out clear support for the intensification and modernisation of both Key Employment Sites and any other employment sites where the site is located within a district or city centre.</p> <p>It is recommended that a higher level of protection be afforded to existing employment sites to prevent change of use unless there is robust evidence provided to demonstrate that it is poorly performing in employment use.</p> <p>Wording should also be included which allows for the redevelopment of employment sites for suitable employment uses.</p>	<p>Noted.</p> <p>All employment sites over 0.25ha were assessed and the Key Employment Sites were selected where they scored well against the assessment criteria. Policy E1 already sets out a higher level of protection for Key Employment Sites.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Best use of employment sites	The city should divest its property holdings.	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	Best use of employment sites	Agree, take initiative to protect employment, do not rely on national initiatives alone.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Any opportunity to change to housing from commercial use should be taken.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	I think changing employment sites to housing is fine if the market supports that	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Always consider impact on existing communities.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	Encourage working from home where possible to make room for housing	<p>The type of employment floorspace coming forward (i.e., R&amp;D), often requires the workforce to come into the workplace rather than being able to work from home. Also, Different organisations have different work from home policies.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Best use of employment sites	What grieves me are the number of exceedingly ugly building such as the large structures in Speedwell Street or the intrusive Oxfordshire County Council offices which do not reflect the character of the city.	Preferred Option selected for reasons set out in Background Paper
E1	Best use of employment sites	The currently adopted Local Plan classifies the MINI Plant as a Category 1 site, and it is noted that the 2042 Preferred Options consultation	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>document has maintained and streamlined this classification of the MINI Plant into simply a “Key Employment Site”.</p> <p>It is essential that manufacturing uses at the MINI Plant continue to receive this highest level of policy protection to enable the company’s operations to expand and modernise within a stable policy environment.</p>	
E1	Housing on Employment sites	Support Option 1	
E1	Housing on Employment sites	<p>Support Alternative Option 1</p> <p>Reasons provided include:</p> <ul style="list-style-type: none"> <li>- Housing is a crisis at present</li> <li>- If there is a greater need for housing, then let it be built on employment sites. There’s no point in maintaining places of employment if people don’t have places to live.</li> <li>- it will help preserve existing employment sites.</li> <li>- Housing would not be an appropriate use at the MINI Plant given its manufacturing use.</li> <li>- We support principle of allowing housing delivery on employment sites provided that other policy considerations are met. We would go further to say that this</li> </ul>	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		should be encouraged to ensure a mixed use of sites.	
E1	Housing on Employment sites	Housing should be secondary to employment. Housing can be anywhere, does not need to be ring-fenced where employment is.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	The city shouldn't be able to allow as it shouldn't be in the property market.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Bring it on!	General comment/ statement. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Yes...appropriate mixed use	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	Does not specifically allow an element of housing delivery on existing employment sites	Preferred Option selected for reasons set out in Background Paper
E1	Housing on employment sites	It depends a bit how close any potential residential units will be to suitable infrastructure (shops, public services, transport etc.).	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	Evaluate each employment site to determine if it is beneficial to local people. Cultural centres should not be focused as an easy route to housing just before their income is not as excessive	Employment sites over 0.25ha were all assessed against set criteria including specific local objectives. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	I think this [ <i>housing</i> ] should be required not just allowed.	Preferred Option selected for reasons set out in Background Paper

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	Housing on Employment sites	Densification for housing seems to be a solution where 4 or 5 story flats that don't interrupt the skyline can be built in areas of existing employment sites - and in city centre sites.	Policies that set out appropriate residential densities are included elsewhere in the plan. Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	It is recommended that all Key Employment Sites are protected from policy driven inclusion of residential development, unless it can be demonstrated that this residential development does not impact the role and function of the key employment site. The priority should remain modernising and intensifying in line with the existing employment use.	Preferred Option selected for reasons set out in Background Paper
E1	Housing on Employment sites	<p>Some sites which are currently in commercial use e.g. the retail parks off the Botley Road, and the Osney Mead industrial estate, should be allocated by the council entirely for housing, ideally affordable housing. Developers (including the university and colleges) should NOT be allowed to build yet more labs on these sites. Such commercial developments potentially provide more jobs (for the university) but do not address the problem of where those workers are to live. Most people (particularly young people) can't afford to live in Oxford, so they are forced to live outside and to commute in, adding to traffic problems in and around the city.</p> <p>Additionally, there should be an active policy to turn currently empty spaces above shops in the</p>	<p>Preferred Option selected for reasons set out in Background Paper</p> <p>Permitted development rights already exist to support the conversion of these spaces to residential.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		city centre into affordable living accommodation for citizens (not university students).	
E1	Housing on employment sites/ Location of new employment uses	<p>Protection of mixed-use sites (e.g. Retail, restauration) as well as residential sites from conversion to hotels</p> <p>Expansion of or acquisition of sites for conversion to education purposes should be expressly considered as employment uses and should not be permitted if it results in loss of residential dwellings of any size.</p>	<p>Policy E5 deals with hotel and short stay accommodation.</p> <p>Local Plan already contains separate policies relating to academic institutions and includes a policy to prevent the loss of dwellings.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Housing on Employment sites	If employment land is able to accommodate labs and other employees with regular use within flood risk areas, want to see this land available for allocation to housing as well.	<p>Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Housing on Employment sites	Please reject construction on Oxford's flood plain.	<p>Plan includes separate policies to govern appropriate development in flood risk areas, supported by national policy. Preferred Option selected for reasons set out in Background Paper</p>
E1	Location of New Employment	Reasons provided include: <ul style="list-style-type: none"> <li>- may attract new SMEs and the creative economy.</li> </ul>	<p>Preferred Option selected for reasons set out in Background Paper</p>
E1	Location of New Employment	Support Alternative option Reasons provided include: <ul style="list-style-type: none"> <li>- Less rigid</li> <li>- allows for a plan-led, limited, and strategic release of new employment</li> </ul>	<p>Preferred Option selected for reasons set out in Background Paper</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
		<p>sites without compromising the protection of existing housing land. This strikes a more effective balance between competing land-use pressures.</p> <ul style="list-style-type: none"> <li>- The market should have more flexibility in determining the most appropriate uses that meet market dynamics at the time of development - being over prescriptive may impact the delivery of any type of development.</li> <li>- It is important not to hamper Oxford's thriving economy by making employment creation difficult.</li> <li>- seems okay too but am not an expert on employment sites.</li> </ul>	
E1	Location of New Employment	<p>Rely solely on national policy</p> <p>Reasons provided include:</p> <ul style="list-style-type: none"> <li>- Simpler</li> <li>- Let housing and employment coexist /exist freely, as needed, wherever needed.</li> <li>- Don't interfere or intervene. Let the market decide.</li> <li>- We shouldn't be adding more restrictions</li> </ul>	Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	If the preferred option went ahead, provisions for transport links to these sites might need to be considered.	Preferred Option selected for reasons set out in Background Paper.

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	Location of New Employment	Judge each case on its merits. Generally, the principle is ok - but not to be followed slavishly.	Preferred Option selected for reasons set out in Background Paper
E1	Location of New Employment	<p>Oxford's economy is dynamic and rapidly evolving, particularly in sectors such as life sciences, research, technology, and advanced manufacturing. A more flexible policy that enables some employment development outside of currently designated sites will allow the city to respond to emerging opportunities and market demands, especially where existing sites may be constrained or nearing capacity.</p> <p>Permitting new employment uses adjacent to existing employment sites allows for logical and coordinated expansion of successful clusters (e.g. near hospitals, science parks, or research campuses), where businesses benefit from agglomeration, infrastructure, and workforce proximity.</p> <p>Allowing new employment sites to come forward as part of mixed-use developments, including residential, is consistent with national planning principles and Oxford's broader sustainability objectives. This supports walkable communities, reduces commuting distances, and makes more efficient use of land.</p>	<p>Policy E1 supports the expansion of successful clusters through modernisation and intensification of employment-generating uses at existing sites, supported by any necessary infrastructure.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
E1	General comments	<p>A flourishing oxford economy needs to allow new businesses and employers find new sites for competition.</p> <p>I do not support new employment sites before housing, and I do not support ANY new employment sites in the city centre.</p> <p>No loss of housing to accommodate commercial use should be allowed - even in the centre.</p> <p>The MINI Plant is suitable for new employment uses that supports its primary manufacturing use.</p> <p>Don't build in Green Belt</p>	Preferred Option selected for reasons set out in Background Paper
E1	Criteria based approach to employment	<p>A blanket rule that confines all fresh employment floorspace to current sites and city/district centres “planning permission will not be granted ... outside of these locations” ignores Oxford’s acute shortage of modern lab and office space, already driving premium rents in every quarter of the city. Allowing well-connected plots immediately adjacent to key campuses to come forward (and, where viable, pairing them with housing) would expand capacity, shorten commutes and curb price inflation without sacrificing existing dwellings. A criteria-based green light at the margin is far more pro-growth than a hard red line.</p>	<p>A significant pipeline of Research and Development (R&amp;D) space is coming being delivered in the city. Significant floorspace already has permission/ is under construction. This is all on existing sites/ within the city and district centres and through lawful changes of use within Use Class E. Preferred Option selected for reasons set out in Background Paper</p>

## Statutory Consultee Responses – Draft Policy E1

Cherwell District Council

Draft Policy	Summary of comment	Response	Outcome
E1	<p>The policy says new employment generating uses will be acceptable only on existing employment sites and the city and district centres, but says that outside of these locations non-designated sites can only be regenerate for employment purposes if certain criteria are met.</p> <p>B8 uses are not always regarded as the most appropriate use within the city. The approach set out should be reviewed so that the policy can reflect the emerging and future assessment of need for such uses, rather than to try and impose this restrictive approach.</p>	<p>This is not the intention of the wording, which will be reviewed.</p> <p>We are not quite sure what is being asked for in terms of B8 uses. Our evidence base demonstrates that there is limited demand for these uses in the city because there are not suitable sites- they are generally too high in value and they are not on the strategic road network and they are too small. A policy approach that requires sites to remain in this use or new sites to come forward for this use as opposed to other uses such as housing does not seem a sensible approach and we're not entirely sure what is intended with this suggestion.</p>	<p>Tweaks have been made to the policy wording to add clarity.</p>

South Oxfordshire District Council and Vale of White Horse District Council

Draft Policy	Summary	Response	Outcome
--------------	---------	----------	---------

Draft Policy E1	Concerned that the ELNA shows that draft policies will result in wider economic impacts on the Oxfordshire economy. It is not clear how key employment sites were identified. More information, including criteria, is needed in the background paper.	ELNA looks at Oxford's city's land needs only, which creates the conditions to meet Oxford's identified land needs within the city. The employment sites were assessed using specific criteria.	We will be publishing the methodology for identifying Key Employment Sites in a Background Paper at Reg. 19 stage.
-----------------	--	---	--

### Oxfordshire County Council

Draft Policy	Summary of comment	Response	Outcome
E1	<p><b>Strategic Planning</b></p> <p>Re: loss of non-designated employment sites to housing: Policy E1 is not clear in that the approach should be for housing first and other non-employment uses second. Although housing in sustainable locations must be the focus, the policy as worded could result in land-use conflicts and loss of employment, which is still important for the City. Therefore careful consideration must be given to this policy.</p> <p>In addition, infrastructure demands from new housing on these formerly employment locations need to be taken into account and mitigated by these new housing developments, where the County Council's expectations are that these become highly</p>	<p>It will be for landowners to decide whether further employment uses, or an alternative use is proposed at a non-designated employment site. The plan sets out that housing would be supported at non-designated employment sites (subject to the policy criteria).</p> <p>Noted.</p>	<p>Overall, editorial changes to Policy E1 aid its legibility and clarity. These changes have regard all comments made by the County Council, in particular, those from the County</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>sustainable, net zero ready and adequately serviced housing developments.</p> <p>We welcome future conversations with the City Council to assist in the drafting of the wording for this policy as the current criteria include matters of particular interest to the County Council such as being well connected to public transport and active travel opportunities.</p> <p><b>Place Planning and TDM (Central)</b></p> <p>Linked to comment at draft policy S3 - new employment-generating uses and intensification of existing sites, coupled with low car parking, will increase demand for P&amp;R, as well as bus and rail.</p> <p><b>County Council Property and Estates Team</b></p> <p>Oxfordshire County Council Property and Estates Team notes that this draft policy currently categorises employment sites into three categories: 1) Key Employment Sites; 2) Employment sites located within a city or a district centre; and</p>	<p>We will maintain a dialogue with the county on relevant matters.</p> <p>Noted.</p> <p>The City Council considers that two categories of employment sites exist. Designated sites and non-designated sites. Sites located in the city and district centres are generally non-</p>	<p>Property and Estates Team.</p>

Draft Policy	Summary of comment	Response	Outcome
	<p>3) Non-designated employment sites</p> <p>Oxfordshire County Council Property and Estates Team supports the objectives of this draft policy as a whole, although it is considered that it is restrictive and lacks the inclusion of a proportionate element that is required to enable sustainable development.</p> <p>The second paragraph of this draft policy states: <i>"The only locations that are suitable for new employment-generating uses are existing employment sites and the city and district centres. Planning permission will not be granted for proposals for employment-generating uses outside of these locations."</i></p> <p>First, this paragraph introduces a new category of employment sites other than those listed above, which are the "existing employment sites". Oxfordshire County Council Property and Estates Team considers that for the sake of improving clarity, this should be replaced with either "Key Employment Sites" or specified that this part of the draft policy refers to existing employment sites within the city and district centres.</p>	<p>designated employment sites and do not need their own specific designation.</p> <p>Noted.</p> <p>Noted.</p> <p>As the plan introduces no new employment site allocations, all employment sites (both "key" and "non-designated" are existing employment sites.</p>	

Draft Policy	Summary of comment	Response	Outcome
	<p>Second, the second part of this draft policy is considered to be quite restrictive and onerous, as it fails to take into account the proportionate element of a development proposal. Paragraph 86 (e) of the NPPF highlights that planning policies should be flexible enough to accommodate needs not anticipated in the plan in response to changes in economic circumstances. It is the view of Oxfordshire County Council Property and Estates Team that this part of the policy should be revised to state that:</p> <p><b><i>“Planning permission will not be granted for <u>Development proposals for employment-generating uses outside of these locations will not be supported, unless they are in accordance with the development plan as a whole and it can be demonstrated that...</u>” (include criteria mentioned in fourth paragraph of this draft policy text)</i></b></p> <p>Equally, the first part of the fourth paragraph states:</p> <p><b><i>“Planning permission will only be granted for the intensification and modernisation of all other employment sites where that site is located within the city or a district centre.”</i></b></p>	<p>The city and district centres are appropriate locations for new employment-generating uses. As such, we do not wish to restrict new employment-generating uses to existing employment sites within these accessible locations.</p> <p>Policy E1 is aligned with the plan's overarching strategy which supports housing delivery. Emerging evidence shows that the city's employment land needs can be met wholly on existing employment sites. As such no new site allocations are needed. New employment-generating uses can therefore come forward at existing sites or on sites within the city and district centres.</p>	

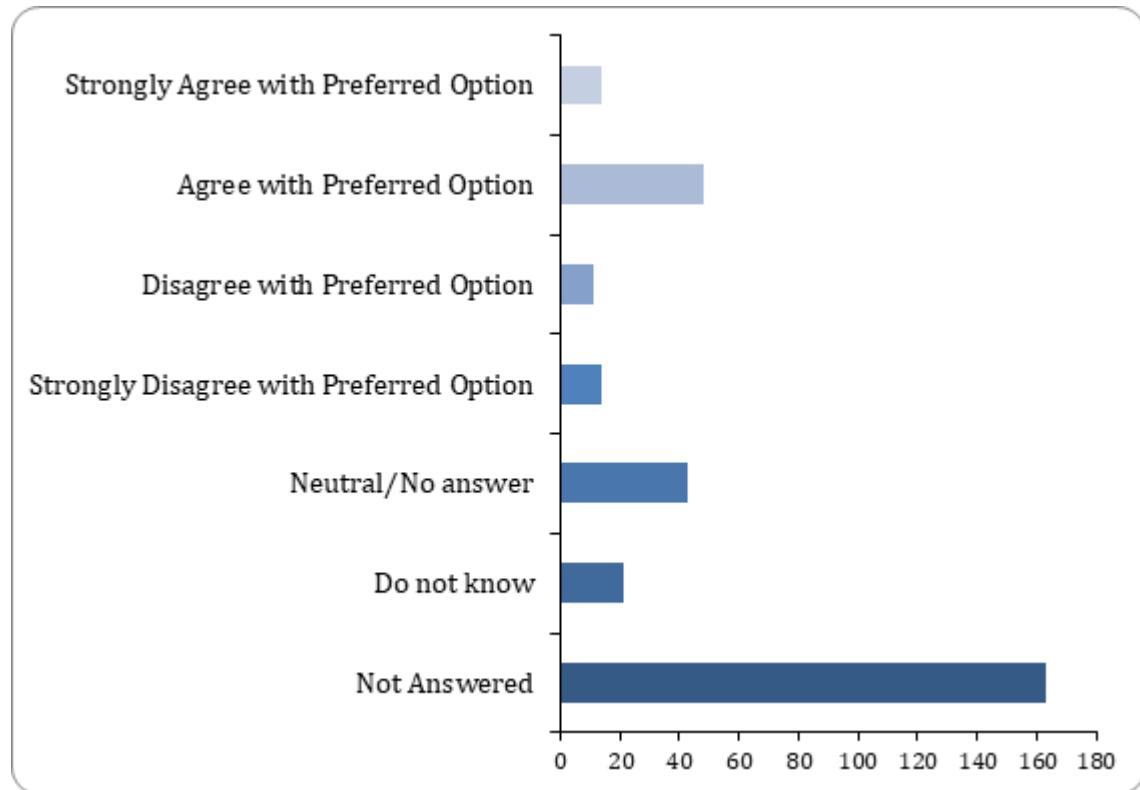
Draft Policy	Summary of comment	Response	Outcome
	<p>Oxfordshire County Council Property and Estates Team considers that planning permission should not automatically be granted for employment development within these locations, as they could conflict with other policies of the development plan. Accordingly, Oxfordshire County Council Property and Estates Team considers that the wording should change to demonstrate that these types of proposals will be supported.</p> <p>Paragraph 6 explains that development proposals seeking the net loss of employment floorspace on Key Employment Sites will not be granted planning permission, unless the number of jobs in employment-generating uses is retained and the employment use can be maintained.</p> <p>Oxfordshire County Council Property and Estates Team considers that this part of the draft policy, as it is currently drafted, lacks the appropriate clarity that would enable development proposals to achieve sustainable development. Oxfordshire County Council Property and Estates Team is concerned is that using the number of jobs that will be retained to assess development proposals is not appropriate, as different economic circumstances apply to small, medium</p>	<p>The proposed amendment weakens this position and potentially undermines the city's ability to deliver homes.</p> <p>This paragraph does not automatically grant planning permission, instead it sets out that the principle of intensification and modernisation is acceptable in this location. Other policies in the plan specifically deal with other requirements (e.g., net zero, urban design, heritage etc.). These all need to be taken into account when coming to a decision.</p> <p>Noted.</p> <p>As Key Employment Sites are larger sites (over 0.25ha), this policy would ensure that any loss of employment floorspace</p>	

Draft Policy	Summary of comment	Response	Outcome
	<p>and large businesses. Therefore, it is considered that this part of the draft policy should be reconsidered to include a proportionate element in order to ensure that sustainable development can be achieved.</p> <p>The last paragraph of this draft policy states that development proposals for residential development on all employment sites will be assessed by a “balanced judgement” which will take into consideration a number of “objectives”. Oxfordshire County Council Property and Estates Team considers this part of the draft policy to be confusing, as it is unclear as to the purpose and weight this “balanced judgement” would attract in decision making. It is also unclear as to whether this would fall within the assessment carried out by a decision maker when conducting the planning balance or it would consist of a separate process.</p> <p>Last, it is unclear as to the weight each of the six proposed objectives should attract in decision making. It is therefore difficult to ascertain whether it would be expected of a decision maker to attach equal weight to all of them, when carrying out their assessment.</p>	<p>at these larger sites would not result in a loss of jobs. While it is clear that there are concerns about using the number of jobs as a metric to assess floorspace losses at Key Employment sites, no other specific metric is proposed or suggested. No change proposed.</p> <p>The phrase ‘a balanced judgement’ was an amendment made by a Planning Inspector. These are the issues that the case officer needs to consider when determining such an application. There is not a separate process.</p> <p>The weight needs to be applied through a “balanced judgement” which considers all aspects. We will discuss with our DM colleagues to ensure that they can follow the policy.</p>	

## All Public Responses – Draft Policy E2

Please tell us what you think about policy options set 004b (draft policy E2): Warehousing and Storage Uses. If you have any additional comments please put them in the comment box below.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	14	4.46%
Agree with Preferred Option	48	15.29%
Disagree with Preferred Option	11	3.50%
Strongly Disagree with Preferred Option	14	4.46%
Neutral/No answer	43	13.69%
Do not know	21	6.69%
Not Answered	163	51.91%

Topic	Summary of comments	Response
Support with suggested amendments	<p>Policy E2: Should go beyond 'promote the use of freight consolidation centres where possible' and aim to proactively identify potential sites for consolidation centre(s) for more efficient distribution into the city.</p>	Preferred Option selected for reasons set out in Background Paper
Support in principle	<p>ONV supports the principles behind this policy, however, considers that the flexibility of the policy should depend upon the appropriateness of the location rather than whether there is a demonstrable need for the use on the site.</p> <p>Oxford North, for example, has very good access to the strategic highway network and could be considered an appropriate location for some warehouse and storage use.</p>	<p>We will consider this issue when drafting the Reg. 19 policy.</p> <p>Noted.</p>
Support freight consolidation and local B8 uses.	CPRE support an exemption for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road.	Support Noted.
Object to B8 uses supporting national economy.	We support for loss of B8 uses, but the word "generally" must be deleted in order to make this policy possible to apply in practise.	The word "generally" in this context is not contained in the policy. It is in the supporting text and refers to some of the characteristics of new large-scale B8 uses. We consider it is

Topic	Summary of comments	Response
	<p>Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification we support, but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify employment sites and decrease the total number of B8 sites in Oxford.</p>	<p>appropriate, given the context in which it is used.</p> <p>Support for local B8 uses noted as is objection to policy support for B8 uses supporting the national economy. Preferred option selected for reasons set out in Background Paper.</p>
Policy is overly restrictive and inappropriate.	<p>Whilst it is acknowledged that larger Clas B8 facilities can consume a lot of land, they are essential in a local economy and they don't always need to consume large areas of land. They provide diversity and opportunities to local residents and support other uses.</p> <p>Such uses around Oxford should be viewed in a positive light. The Mini Plant Oxford (BMW) and Unipart sites are the only significant key employment sites conducive to the delivery of a diverse range of employment uses including B8 (by virtue of their size and location).</p> <p>Draft Policy E2 appears to aim to allow such a use, but the requirement to demonstrate that the use is essential to support the operational requirements of that key employment site is inappropriate and overly restrictive. It's worded so it has to be</p>	<p>Noted.</p> <p>Noted.</p> <p>We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).</p>

Topic	Summary of comments	Response
	essential to support other development on the same key employment site, which is nonsensical.	
General principle supported	ARC supports the general principle of Draft Policy E2. Supports the flexibility of E2 in that the policy supports new B8 uses, while also allowing their loss within key employment sites.	Support noted.
Policy tests	ARC questions whether the policy tests relating to whether its provision/loss is 'essential' to the Key Employment Site is required. This should be determined by market conditions.	We will consider these comments when drafting this policy for the next stage of consultation (i.e., Reg. 19).
Support existing approach	Reasons provided include: <ul style="list-style-type: none"> <li>• Restrict B8 uses to nationally important sites only.</li> </ul>	Preferred Option selected for reasons set out in Background Paper
Support Preferred Option	Support preferred option	Preferred Option selected for reasons set out in Background Paper
Support Freight consolidation pilot	Reasons provided include: <ul style="list-style-type: none"> <li>• Strong support for freight consolidation if the aim of this is specifically to decrease the number of delivery journeys required by road.</li> <li>• would be valuable to enable LGV/ HGV freight to be moved to electric delivery vehicles.</li> </ul>	Preferred Option selected for reasons set out in Background Paper
Object to Freight consolidation pilot	Reasons provided include:	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	<ul style="list-style-type: none"> <li>reject idea of freight consolidation centre in any single location.</li> <li>Council should prioritise increasing freight transfers from HGV and other goods vehicles to cargo/e-cargo bike enterprises at a wide variety of lay by sites or comparable to help reduce large vehicles entering Oxford on as many routes as possible.</li> <li>Also, cooperation with other local authorities to make this a common policy to assist in traffic reduction should be pursued and implemented.</li> <li>The specific exemption to enable a 'pilot' of a suitably located freight consolidation centre is highly problematic. Too many so-called 'pilots' do not have clearly defined objectives, are not adequately monitored and evaluated, allowing them to proceed. They should be fully transparent and re-designated as phase 1 projects if that is the intention.</li> </ul>	
Support further restrictions	<p>Reasons provided include:</p> <ul style="list-style-type: none"> <li>If an employment site requires a massive warehouse to be viable then it shouldn't be built in an area with such restricted space. Build a different type of employment site</li> </ul>	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	<p>that makes better use of both the location and where the warehouse would have to be.</p> <ul style="list-style-type: none"> <li>• Land within the city is too scarce for this use.</li> </ul>	
Rely solely on National Policy	<p>Reasons provided include:</p> <ul style="list-style-type: none"> <li>• More bureaucracy</li> <li>• Don't create an interventionist policy</li> <li>• Let the free market decide</li> </ul>	Preferred Option selected for reasons set out in Background Paper
No warehousing on new sites.	Warehousing etc should not be allowed on new sites at all. It is an ineffective use of scarce space and provides little employment. It is not Oxford City's role to support the national economy.	Preferred Option selected for reasons set out in Background Paper
No B8 on green belt	No new warehouses should be built on green belt sites	Preferred Option selected for reasons set out in Background Paper
Support loss of B8 uses	Support for loss of B8 uses, but the use of the word "generally" would make this policy impossible to apply in practise.	The word "generally" appears in the supporting text rather than the policy in relation to a description of "large scale B8 uses". It is appropriate given its descriptive context.
Support local B8 uses but not national	Specifying support for new B8 uses if required to support locally recognised employment sites is a useful clarification but declaring support for B8 sites that support the national economy once again removes clarity and undermines the aim to intensify	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	employment sites and decrease the total number of B8 sites in Oxford.	
Land values enough to deter inefficient uses	I would expect the high cost of land in the city to mostly suffice to deter inefficient uses.	Preferred Option selected for reasons set out in Background Paper
Unlikely to be needed	Major storage sites rarely need to be located within the city.	Preferred Option selected for reasons set out in Background Paper
MINI Plant Oxford	The MINI Plant is suitable for new B8 employment uses that support its primary manufacturing use	Preferred Option selected for reasons set out in Background Paper
General comment	Do not understand the question	Preferred Option selected for reasons set out in Background Paper
Too much jargon	I don't really understand this - e.g. sizing of these warehouses etc. Would need de-jargonising and more detail to be able to take a view.	Preferred Option selected for reasons set out in Background Paper

## Statutory Consultees – Draft Policy E2

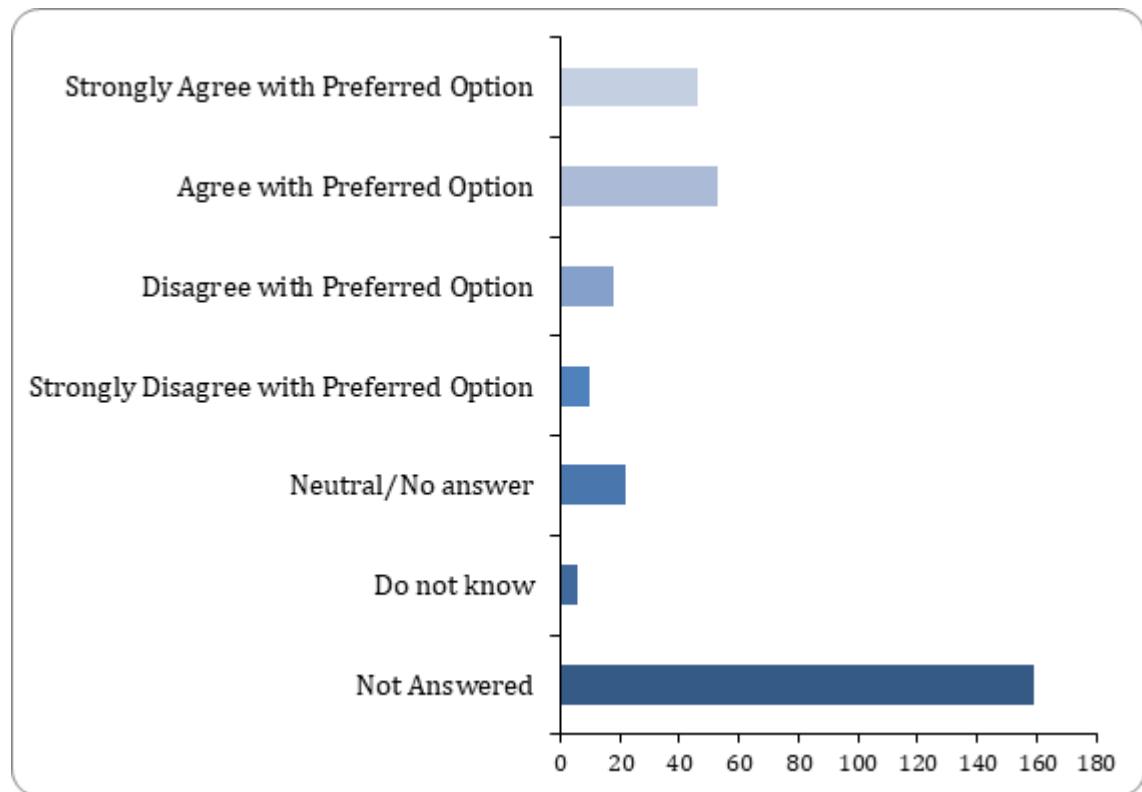
No statutory consultee comments on draft policy E2.



## All Public Responses – Policy E3

Please tell us what you think about policy options set 004c (draft policy E3): Community Employment and Procurement Plans. If you have any additional comments please put them in the comment box below.

There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	46	14.65%
Agree with Preferred Option	53	16.88%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	22	7.01%
Do not know	6	1.91%
Not Answered	159	50.64%

Topic	Summary of comments	Response
General Comment	CEPP submissions should be supported by compelling evidence.	Noted.
support	<p>Support as genuine mechanism for supporting community wealth building.</p> <p>Should be strengthened to reference “community &amp; solidarity economy” businesses within the local economy and recognise the role that these “social trading” businesses play in inclusive development.</p>	Support noted.
CEPPs may not be practical.	For many small occupiers a CEPP requirement may not be practical or reflect their realities. The draft policy should recognise that a CEPP must be proportionate with the type of development and employment. It is recommended that the policy is an encouragement, not mandatory requirement to provide flexibility. Alternative Option 1 is supported.	<p>CEPP requirement only applies to qualifying developments as set out in policy.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
Clarity in relation to student accommodation	Policy E3 relates to the provision of Community Employment and Procurement Plans where developments are proposed which include the provision of 50 or more dwellings or where they propose 1,000 Square metres of non-residential employment space. The policy is unclear on how this would relate to uses such as student accommodation and clarity is required on that. This matter was raised as part of the previous 2040 local	The equivalent number of dwellings that relate to student accommodation is usually calculated using the most recent ratios set by the Government. We will consider how to address this issue more widely as it

Topic	Summary of comments	Response
	plan submission and has not been addressed as part of this latest consultation.	likely impacts more than this policy in isolation.
Objection	Policy promotes too much government interference in the operation of business.	Noted.
Support	The approach to Community Employment and Procurement Plans is supported.	Noted.
Object to mandatory CEPPs	<p>CEPPs should not be mandatory for all commercial schemes. This adds to viability concerns. The mandatory expectation that all developments of a certain threshold “must” address “all” of the listed interventions risks imposing rigid and overly burdensome obligations on proposals.</p> <p>The cumulative cost and complexity of implementing all the listed criteria may not be possible. Many of the listed criteria (e.g., use of local labour or enforcing Oxford Living Wage policies on contractors and occupiers) may not be deliverable or enforceable across all schemes.</p>	<p>CEPP requirement only applies to qualifying developments as set out in policy. A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.</p> <p>The Reg. 18 policy did not impose a mandatory requirement but rather that “CEPPS will be expected to consider all the following criteria”. We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy.</p>

Topic	Summary of comments	Response
Amendment	<p>ARC therefore recommend that Policy E3 be amended to remove the rigid “only be granted” condition, instead framing CEPPs as a potential tool of securing social value in proposals. The listed interventions (a-i) should form a flexible menu that can be tailored by development scale and context.</p> <p>ARC notes the Council states a TAN will be needed to expand on various aspects of the policy – it considers this TAN should be published before or alongside Regulation 19 to provide much-needed clarity to the policy.</p> <p>ARC recommends removing the requirement for schemes below the threshold to submit written statements. The administrative and resource burden of preparing bespoke employment-related statements for minor planning applications will likely be disproportionate to the scale and impact (and potential value) of such developments. Furthermore, the practical ability of monitoring or securing any proposed outcomes does not exist – resulting in this being a box-ticking exercise adding unnecessary cost to developers whilst delivering little measurable value.</p>	<p>The intention of the policy is that the list (a-j) forms a flexible menu. The Reg. 18 document set out that CEPPS will be expected to consider all criteria a)-j). We will review wording, taking this point into consideration when drafting the Reg. 19 version of this policy.</p> <p>Noted.</p> <p>We consider that the production of a written statement for development below the threshold is proportionate. If developers view this process as a “box-ticking exercise” that is a shame as when done well, CEPPs can provide valuable opportunities both for local people and businesses.</p>

Topic	Summary of comments	Response
Require CEPPs	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Procurement plans for major developments should be required to demonstrate a particularly high standard of ethical and sustainability criteria.</li> </ul>	Preferred Option selected for reasons set out in Background Paper
Encourage CEPPs	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Not all applications need to prepare a Community Employment and Procurement Plan. Currently Oxford secures this through a S106 agreement which is the most appropriate way forward as it can be assessed on a site-by-site basis.</li> <li>BMW support alternative option 1, to recognise those occasions where a Community Employment and Procurement Plan would not be appropriate or feasible (e.g. specialist materials or construction methods).</li> <li>It is important not to discourage businesses from setting up in Oxford.</li> <li>Every additional compulsory document increases the cost and risk of bringing forward major schemes, particularly for smaller developers who are crucial to Oxford's infill housing and lab refurb pipeline.</li> <li>Training and local hiring targets are laudable, yet they can be secured through voluntary agreements, sector charters or post-consent s106 negotiations without turning the planning gateway</li> </ul>	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	<p>into another compliance hurdle that slows delivery of homes and workspaces the city urgently needs.</p> <ul style="list-style-type: none"> <li>Plans are likely to be totally ineffective in delivering training and education and will merely be an extra cost for applicants.</li> </ul>	
Rely solely on National Policy	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Don't impose requirements on builders, let them build.</li> <li>It isn't the responsibility of the city planners to mandate that employers plan to continue employing labour.</li> </ul>	Preferred Option selected for reasons set out in Background Paper
General comment	Avoid complications at this stage that might deter house builders.	Preferred Option selected for reasons set out in Background Paper
Objection	This is virtue signalling and will result in no benefit except to consultants who will create meaningless unenforceable plans and strategies	Preferred Option selected for reasons set out in Background Paper
General comment	A good policy but doesn't it create more red tape for developers and cost for Council?	Preferred Option selected for reasons set out in Background Paper
General comment	But it would be better still to consider whether endless growth and development is what is needed.	Preferred Option selected for reasons set out in Background Paper
Support local opportunities	<ul style="list-style-type: none"> <li>Strongly agree that local jobseekers and local suppliers should have first right of refusal to opportunities created in Oxford.</li> <li>To promote employment opportunities for local people.</li> </ul>	Preferred Option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	<ul style="list-style-type: none"> <li>Local businesses, designers, contractors and employees should be prioritised strongly</li> <li>It sounds like a good idea to source labour and materials locally to provide local employment and reduce the environmental impact of the supply chain.</li> <li>Local businesses, designers, contractors and employees should be prioritised strongly.</li> <li>Clause to ensure that these plans are locally led and have clear evidence of local inputs and stakeholder engagement.</li> </ul>	
Support Oxford Living Wage	<p>We would strongly support an additional policy that requires employers to pay employees and indirectly employed workers (such as contractors) the Oxford Living Wage.</p>	<p>The Oxford Living Wage is already included as a potential “criterion” for consideration under the CEPPs Policy.</p>
In principle support (with suggested amendments)	<p>Support inclusion of policy requiring CEPPs however a stronger focus on local procurement is needed to properly align with national policy.</p> <p>The failure to use local businesses in the procurement of major projects in Oxford needs to be corrected.</p> <p>If the policy focuses on the engagement of local businesses rather than individuals, this will have a much greater and longer-lasting beneficial</p>	<p>Support noted.</p>

Topic	Summary of comments	Response
	<p>effect on the local economy and the environment. The distances travelled will be far less, the numbers of people engaged will be far more, and the businesses will keep them employed after the project has concluded. If the policy covers not just construction jobs but also the design jobs and supply jobs which are all part of the procurement process, then that will have a wider positive impact too. Suggest this wording for the policy E3:</p> <p><i>Planning permission will only be granted for proposals.....where they are supported by a site-specific Community Engagement and Procurement Plan (CEPP). The CEPP must identify how the procurement process has already and will ahead:</i></p> <ul style="list-style-type: none"> <li>A. <i>optimise the potential for local businesses to undertake as much as possible of the work in the design, supply and construction processes, for instance by the tendering of discrete work packages rather than combining them into larger contracts and by setting eligibility criteria which are viable for smaller businesses,</i></li> <li>B. <i>use a method of assessment of tenders and bids which gives appropriate weight to:</i></li> <li>• <i>lower carbon footprint through travel and other measures,</i></li> <li>• <i>levels of local employment,</i></li> <li>• <i>commitment to the Oxford Living Wage,</i></li> </ul>	<p>The policy already includes “criteria” e) and h) which expect applicants to consider:</p> <p>e) Procuring a proportion of on-going supply chain needs locally;</p> <p>h) Procuring a proportion of construction materials locally.</p> <p>The introduction of local planning policy requirements (in the manner suggested here) to govern the specific tendering processes of individual businesses and organisations would fall outside of the remit of local planning policy.</p> <p>Preferred option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
	<ul style="list-style-type: none"> <li>• <i>training programmes,</i></li> <li>• <i>and community engagement.</i></li> </ul> <p><i>The CEPP will set a target for the percentage of the total expenditure on the project that is to be delivered through local businesses and will record the actual percentage upon completion. This data will be available upon demand by OCC and then to the public.</i></p> <p><i>The City Council will use a condition to ensure the CEPP is adopted and followed by the applicant.</i></p>	

## Statutory Consultees – Draft Policy E3

Oxfordshire County Council

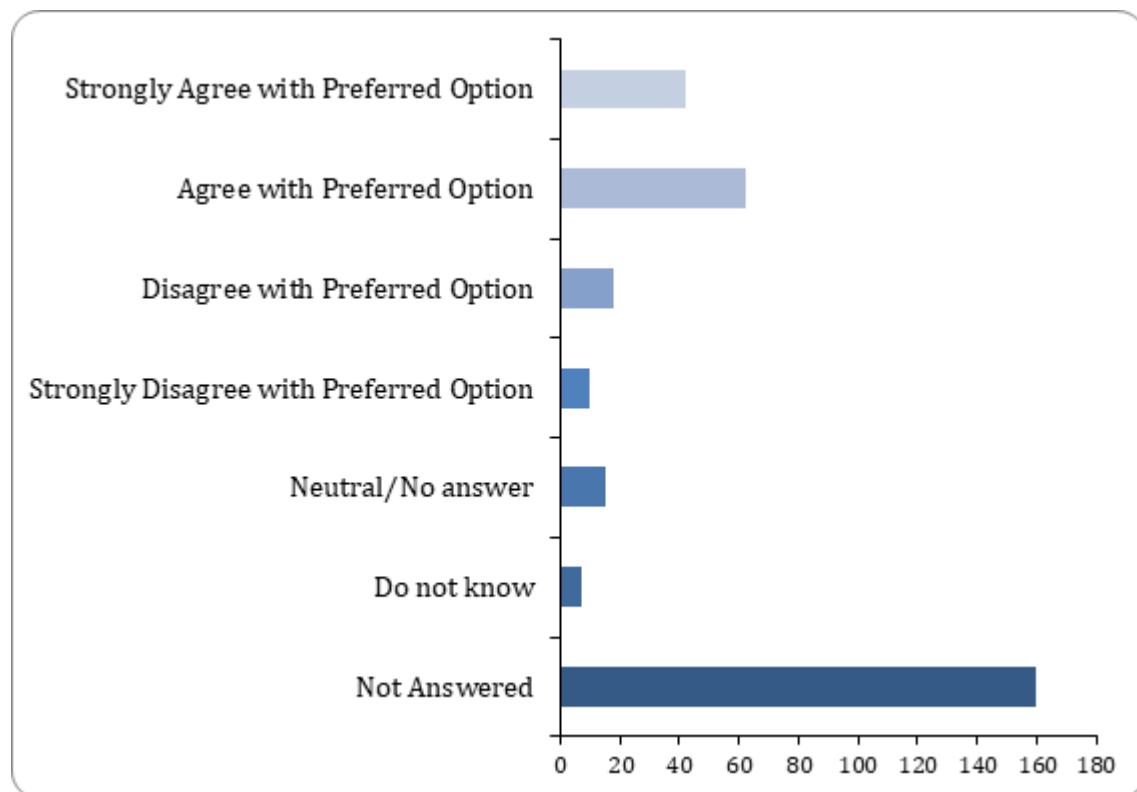
Summary of comment	Response	Outcome
<p><b>Strategic Planning</b></p> <p>Enterprise Oxfordshire (formerly OxLEP) promotes policies requiring Community Employment Plans. The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce where new</p>	Noted.	No action required.

Summary of comment	Response	Outcome
<p>development proposals are coming through the planning system. In conjunction with Enterprise Oxfordshire (formerly OxLEP) we therefore support this proposed policy.</p> <p>In addition, we would like to highlight that clarity regarding what is understood as 'the inclusive economy' on the first paragraph of the policy would be welcomed, as it would better direct developers on this matter.</p>	<p>The city's economic strategy sets out what is meant by the 'inclusive economy'. It is also included in the glossary of the plan.</p>	<p>No action required.</p>

## All Public Responses – Policy E4

Please tell us what you think about policy options set 004d (draft policy E4): Affordable Workspaces.

There were 154 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	42	13.38%
Agree with Preferred Option	62	19.75%
Disagree with Preferred Option	18	5.73%
Strongly Disagree with Preferred Option	10	3.18%
Neutral/No answer	15	4.78%
Do not know	7	2.23%
Not Answered	160	50.96%

Topic	Summary of comments	Response
Viability	<p>It is noted that Nuffield Sites are expected to deliver affordable workspace as part of their Masterplan and that details of the size, marketing, servicing and the management of these spaces should be set out in an affordable workspace strategy.</p> <p>We note that the definition of affordable workspace states that such spaces is to be available for rent set at an agreed rate below the commercial rent. It is understood, based on the current drafting of the Local Plan that the percentage reduction below the commercial rent is not defined and is to be agreed with OCC as part of the planning process. Our understanding is that any commercial rent reduction will need to be based on the ability of any scheme, i.e., in this case Nuffield Sites, to present a proposal that is capable of being financially deliverable and therefore able to absorb such costs as part of any viable scheme. Affordable workspace has a significant impact on viability and is a core and fundamental consideration in terms of development feasibility and deliverability.</p>	<p>Noted.</p> <p>The Local Plan Viability Study is to be published at the next consultation stage (i.e., Reg. 19).</p>
Concerns about practicalities of implementation.	<p>Operational requirements of major manufacturing/research units and logistical units may make it challenging to integrate smaller workspaces unlike with typical offices). The expectation to deliver as part of a phased development is also problematic because a critical mass will be needed to make it viable.</p>	<p>Preferred Option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
Would Support Encouragement of Affordable Workspaces subject to clarifications.	<p>The provision of an affordable workspace strategy as part of masterplans should not prejudice owners of plots who are not party to masterplans which may or may not be prepared by third parties.</p> <p>In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments.</p> <p>Any provision of affordable workspace should be subject to viability assessment to ensure that it does not prevent appropriate development coming forward. Therefore, in order to protect sites which may be caught by this policy it is suggested that amendments to the wording is included to ensure that viability of plots is not adversely affected.</p> <p>Alternative Option 1 which seeks to introduce text in the local plan encouraging employers to deliver affordable workspace in the city may be more appropriate, subject to clarification on the matters set out above.</p>	<p>Noted.</p> <p>The definition of “affordable workspaces” provides a selection of key sectors. No specific percentage is set – it is for the developer-led affordable workspaces strategy to determine.</p> <p>A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>
Object – Counterproductive to employment delivery	<p>Requiring affordable workspace to be delivered in developments could be counter-productive to the delivery of employment developments.</p> <p>Provision of affordable workspaces will impact the overall scheme viability (particularly combined with increased CIL and potential affordable housing</p>	Noted.

Topic	Summary of comments	Response
	<p>contributions etc). Rental levels in the City are increasing due to demand for space and Oxford's appeal as a hub for research and development. This demand is out stripping supply, especially for laboratory space and any requirements that potentially decrease delivery would exacerbate the supply vs demand imbalance and hence push up rents.</p> <p>Furthermore, seeking to convert Category 3 employment sites to housing runs counter to the approach set out in policy E4 to provide more affordable workspace. In other areas, principally London Boroughs, new affordable workspace has been delivered most effectively via low-cost reuse and/or refurbishment of existing buildings to produce workspace at lower rents. This is especially relevant to Category 2 and 3 sites.</p> <p>However, ONV does support the need for a range of sizes of workspace in Oxford to meet the demands of smaller businesses. It is delivering this at Oxford North to meet a range of needs, including incubator space and smaller co-working areas. However, the general approach should be reconsidered in terms of affordable workspaces.</p>	<p>A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.</p> <p>While the plan does support the loss of existing employment sites not designated as key employment sites to housing (subject to certain criteria) it also enables their regeneration for employment purposes.</p> <p>Support for a range and sizes of workspaces (but not specifically affordable workspaces) is noted.</p>
Provision inappropriate in some circumstances	Whilst the difficulties experienced by SME's and Social Enterprises in finding affordable workspace is understood, this must be considered on a case-by-case basis. In some circumstances it would be inappropriate for this to be provided, particularly where development is for a specific end user rather than speculative development. In terms of Oxford Science Park, it is understood	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	<p>that the intention for Oxford Science Park was to incentivise the best R&amp;D businesses from around the world to lead and progress AI and science-based projects, to rival and compete against Cambridge and other locations globally. Placing restrictions on its use will compromise the ability for this to be achieved.</p> <p>Furthermore, it is noted that the Council now requests considerably higher rates of CIL for Class E Offices and R&amp;D floorspace. There is concern that this would place a significant burden on affordable units. It is therefore requested that this policy is removed or, alternatively, the Oxford Science Park is removed from the list of sites where affordable workspace must be delivered.</p>	<p>A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.</p>
Objection to preferred option	<p>Policy not supported by robust or quantified evidence and the rationale that large floorplates exclude SMEs is inaccurate.</p> <p>ARC delivers large floorplates specifically designed to be subdivided or flexibly let. Many SMEs at ARC occupy these formats. There is no clear assessment of unmet demand, market failure, or how mandatory provision would resolve this.</p> <p>Overall, as drafted, the burden of demonstrating market failure falls on the applicant, which is contrary to the Local Plan's role to assess and address such issues.</p>	<p>Preferred Option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
	Singling out certain sites while exempting others raises fairness and effectiveness concerns.	
AW requirements	<p>Any requirement for AW must be narrowly defined, supported by clear evidence by use class and typology, and viability tested.</p> <p>A requirement should differentiate between different site types and ownership/funding structures (e.g. lab campuses, logistics parks, mixed-use areas) – lab-enabled buildings, in particular, involve much higher build and operational costs.</p>	<p>Glossary provides a definition of affordable workspaces.</p> <p>Preferred Option selected for reasons set out in Background Paper</p>
Details left to a TAN	The Council notes further details would be deferred to a future TAN, this is unacceptable and introduces uncertainty and risks reliance on guidance rather than policy.	TANs are often used to provide Technical Advice for applicants/decision-makers. Preferred Option selected for reasons set out in Background Paper.
Support flexibility of policy	Osney Mead is included within the policy as a site expected to deliver a strategy for affordable workspace. The rationale for the policy (i.e., to facilitate a broader range of businesses within the City), is appreciated by OUD.	Support noted.

Topic	Summary of comments	Response
	Policy does not include a specific percentage requirement. This approach is supported by OUD as it allows flexibility for the provision of affordable workspace to be subject to development viability.	
Require affordable workspaces in line with Draft Policy E4	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Strongly Support E4 Preferred Option which sets out the principle that larger workspace developments need to include an affordability strategy as a part of their masterplan. This is intended to ensure that where there is employment space this is accessible for smaller business and social enterprises.</li> <li>The preferred option would add a full policy and is therefore the strongest stance. We would also be interested in seeing if this could be applied to retail units in order to provide affordable premises for local independent retailers.</li> </ul>	Support noted.
Encourage affordable workspaces	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>While the principle of providing AW is accepted is often something developers would like to provide, this is highly dependent on scheme viability, and in a market where many commercial developments are already facing financial strain, requiring developers to provide this would likely stifle otherwise viable projects.</li> <li>Do not consider it is appropriate to require developers to provide both AW as well as a contribution towards affordable housing (as currently required by H5) - this creates an unfair burden on the developer and</li> </ul>	<p>A Viability Assessment of the financial implications of policies in the plan will be published at the next consultation stage.</p> <p>Viability assessment considers cumulative financial implications of policies in the plan.</p>

Topic	Summary of comments	Response
	<p>creates significant additional costs over and above a reasonable and appropriate level.</p> <ul style="list-style-type: none"> <li>• We consider this policy would adversely impact Class E focussed development in Oxford.</li> <li>• Policy approach is unsound without more evidence on proportional justification and viability. The Council could instead encourage affordable workspace delivery.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Rely Solely on National Policy	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>• Avoid complicated restrictions. Not necessary.</li> <li>• Do not incorporate the concept of affordable workspace in the Local Plan</li> <li>• A free-market solution seems sufficient here. If high-value workplaces outcompete others, good, they're higher value.</li> <li>• Unclear how a larger company should be expected to support a smaller rival, as policy that only included social enterprises justified, seems to be too much interference in normal market operation.</li> <li>• Such policies are unlikely to be enforceable.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Support principle subject to viability and flexible	Do not object in principle to inclusion of a policy requiring the provision of affordable workspaces. Supporting access to workspace for a diverse range of businesses and organisations is important for maintaining Oxford's economic diversity and resilience.	Policy E4 does not set out a requirement to deliver a specific amount of affordable workspace but instead requires an affordable

Topic	Summary of comments	Response
application of policy.	<p>However, any requirement for affordable workspace must be reasonable and proportionate to the scale and nature of the proposed development. It is essential that such obligations are clearly defined, commercially viable in their own right, and do not unduly impact the deliverability of scheme, particularly where developments are already contributing to other planning priorities such as affordable housing or sustainability measures.</p> <p>We encourage the Council to ensure that the policy includes flexibility in its application, with consideration given to site-specific circumstances, market conditions, and the overall viability of development proposals.</p>	<p>workspace strategy (AWS) to be produced to support development proposals on the specific list of sites.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>
Policy compliance monitoring needed	Also needs careful monitoring of compliance and sanctions for non-compliance, if you are to send a supportive signal to those who would benefit for more affordable workspaces.	We will consider issue of monitoring/ compliance/ delivery/ implementation as we draft the Reg. 19 policy E4.
Encourage discounted workspaces through TAN guidance, grants or on council-owned sites.	Requiring every big R&D or office project to carve out subsidised space risks repeating Oxford's housing mistake: load viability costs onto new supply and you simply get less of it. The Plan itself recognises that premium rents stem from a shortage of modern floorspace, not from developer indifference, and that any affordable-workspace offer must clear a "minimum size" and be underpinned by a detailed management plan and legal agreement. Those layers add delay and cost, deterring precisely the investment that would expand capacity and cool prices for all tenants, SMEs included. A stronger economy-of-scale solution is to encourage discounted studios and labs (via TAN guidance, targeted grants or city-owned sites) while letting high-value	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	schemes proceed quickly, thereby increasing total stock, fostering competition and giving small enterprises a wider choice of locations without mandating cross-subsidies that may never stack up.	
General comments	<p>Workplaces that can't sustain themselves aren't long term viable.</p> <p>Commercial development should be minimal</p> <p>Care needed to avoid making development requirements too onerous</p> <p>Subject to demand. There are empty workspaces around the place...question of scale?</p>	Preferred Option selected for reasons set out in Background Paper.

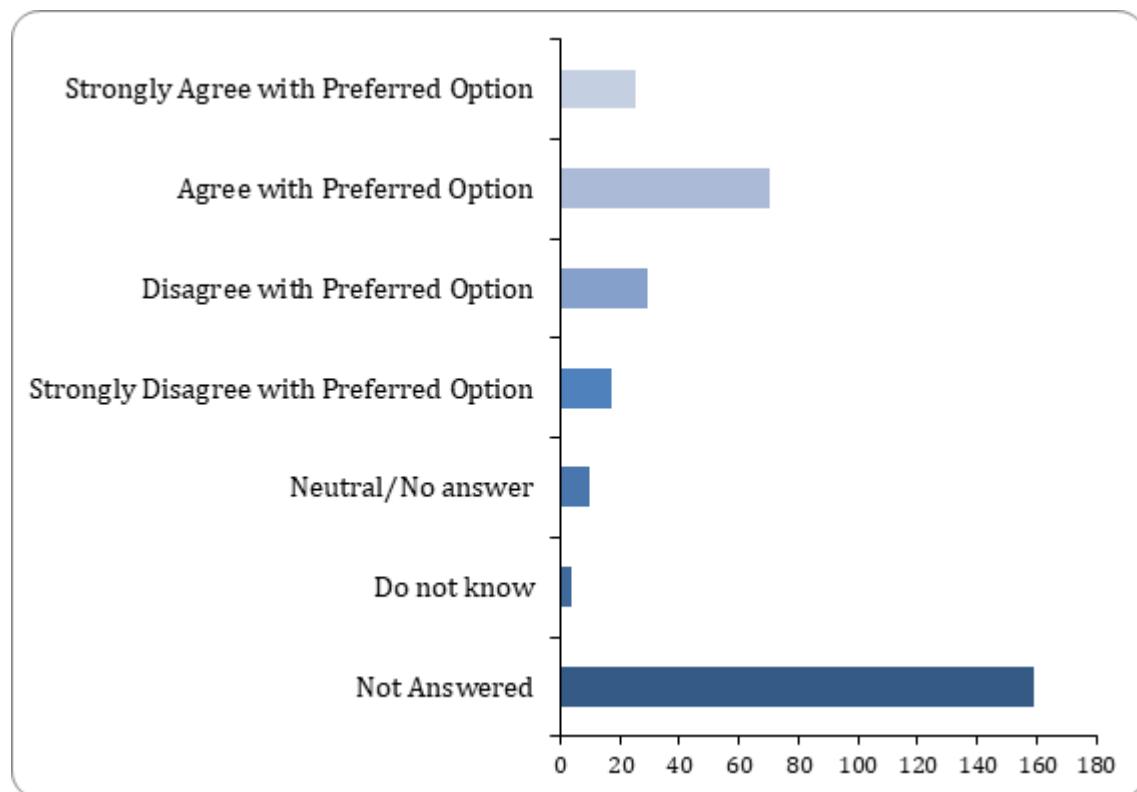
## Statutory Consultees - Draft Policy E4

No statutory consultee comments.

## All Public Responses – Draft Policy E5

Please tell us what you think about policy options set 004e-1 (draft policy E5): New Tourism and Short Stay Accommodation.

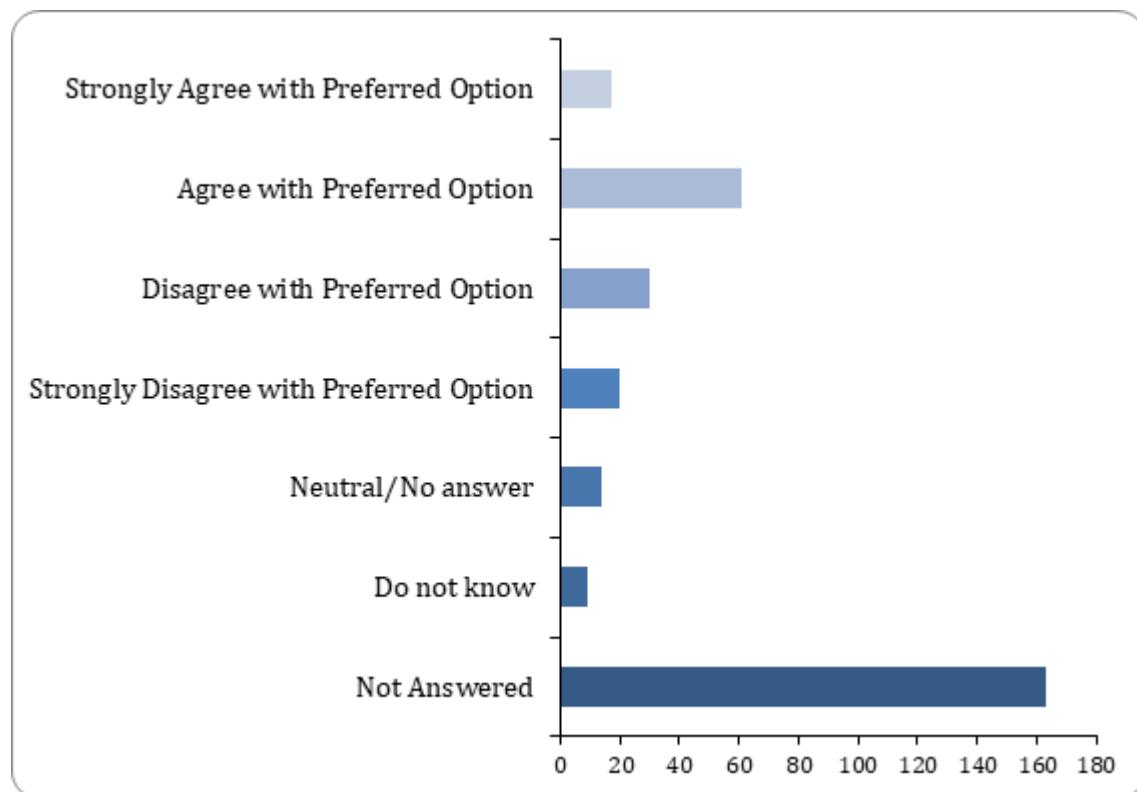
There were 155 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	25	7.96%
Agree with Preferred Option	70	22.29%
Disagree with Preferred Option	29	9.24%
Strongly Disagree with Preferred Option	17	5.41%
Neutral/No answer	10	3.18%
Do not know	4	1.27%
Not Answered	159	50.64%

Please tell us what you think about policy options set 004e-2 (draft policy E5): Existing Tourism and Short Stay Accommodation.

There were 151 responses to this part of the question.



Option	Total	Percent
Strongly Agree with Preferred Option	17	5.41%
Agree with Preferred Option	61	19.43%
Disagree with Preferred Option	30	9.55%
Strongly Disagree with Preferred Option	20	6.37%
Neutral/No answer	14	4.46%
Do not know	9	2.87%
Not Answered	163	51.91%

Topic	Summary of comments	Response
<p>Consider additional reference to level of need within policy/ supporting text.</p>	<p>We agree with Policy E5 in that it supports hotels in the city and district centres, allocated sites, and on Oxford's main arterial roads where there is frequent and direct public transport to the city centre.</p> <p>The policy could be further improved if it made reference to the number of hotel beds needed. The Council's evidence-based document regarding hotels is the Hotel &amp; Short Stay Accommodation Study for Oxford (March 2023), by Bridget Baker Consulting Ltd. It sets out that by 2040, there will be a need for 2,475 new hotel beds. We think that this number is significant and should be referenced in the policy.</p>	<p>Support noted.</p> <p>We will consider making a reference to the overall need for bedspaces in the Reg. 19 Plan.</p>
<p>Consider whether suggested additional issues should be covered by this policy/ policies in the Local Plan</p>	<p>Tourism is a significant sector of Oxford's economy and with it brings its own pressures and problems. It is disappointing to see that there is only one policy within the Local Plan which addresses this issue. Whilst we welcome a policy which seeks to restrict and manage short stay accommodation across the city, there are many other impacts of tourism that need to be managed.</p> <p>Other issues that the policy (or other standalone policies) should cover include impact of tourism on the city's historic core, how the public realm could be improved to accommodate large groups, how tourists arrive and depart from the city and how and where coach parking could be provided.</p>	<p>Support for policy noted.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p> <p>These issues seem to extend beyond the remit of local planning policies. The County Council are in the process of producing a movement and place framework (COMPF). How best to address wider issues including tourist coach parking is also being looked</p>

Topic	Summary of comments	Response
		at outside of the Local Plan process.
Increased flexibility for loss of hotel/ short stay accommodation where sites allocated for comprehensive mixed-use development.	<p>It should be made evidence in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation where site allocations are supported for comprehensive mixed used redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of short stay accommodation is supported. This additional bullet point could be incorporated/read as follows:</p> <ul style="list-style-type: none"> <li>• Or forms part of comprehensive, mixed used development scheme.</li> </ul>	<p>Preferred Option selected for reasons set out in Background Paper.</p> <p>Policy already includes appropriate criteria to support loss of hotel/ short stay accommodation.</p>
Policy should state that new homes are always the priority.	<p>Whilst CPRE support the intent of this policy the provision of homes should always be prioritised over short stay accommodation, such as hotels, and this should be stated in policy.</p> <p>Need tighter wording in the policy from 'must' to 'would'.</p>	<p>The policy supports new hotel and short stay accommodation in line with national policy (i.e., within the city and district centres. It also provides support for new hotel and short stay accommodation on arterial roads for the reasons set out in the Policy/ Background Paper. Outside of these locations, housing is prioritised.</p>

Topic	Summary of comments	Response
Prioritise housing	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>The city should prioritise meeting the needs of its residents and those who contribute to the local community first, before expanding space for tourism.</li> <li>Tourism often drives up the cost of living, making it increasingly difficult for local people—especially workers and families—to afford a decent quality of life.</li> <li>Ensuring affordable housing, services, and amenities for residents must come before catering to tourists, so that the community can thrive sustainably and inclusively.</li> <li>Short stay accom unless in hotels should not be priority. Local housing should. More Short term rentals, Airbnb etc should be discouraged.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Role of student accommodation (outside term-time) to support visitor economy.	<p>The policy identifies that tourism is an important contributor to the local economy and identifies that the locations in which tourist accommodation will be supported.</p> <p>Elsewhere in the Local Plan it is recognised that the use of student accommodation outside of term time is supported therefore, there is the potential to provide support in this policy for the use of student accommodation outside of term time for short stay accommodation which would support the local economy through the provision of tourist accommodation.</p>	<p>Noted.</p> <p>The Plan already recognises the secondary role that student accommodation can play (outside of term-time) in supporting the visitor economy. As such, there is</p>

Topic	Summary of comments	Response
		no need to duplicate that reference in this policy.
Support and suggested amendment to include specific reference to changes of use.	<p>Ch Ch supports this policy - Tourism is important to the economy of Oxford, in particular the City Centre. Christ Church is a major tourist destination and as such it is important that tourist and short stay accommodation is provided to support this and maximise the length of time visitors stay in Oxford.</p> <p>The policy should include reference to change of use in the first sentence. Currently it only covers new development but change of use of existing buildings is also key, for example the former Boswells store.</p>	<p>Support noted.</p> <p>Reg. 18 Plan draft policy E5 includes the phrase “new sites”. We will consider whether this phrase suitably covers changes of use when drafting the Reg. 19 version of the policy and supporting text.</p>
(New acc.) Support preferred policy approach	Support preferred option	Support noted.
Support new hotel/ short stay acc. in city and district centres / allocated sites only	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>• accommodation for tourists is vital for the local economy, but it also exerts pressure on housing for residents. Hence, I feel sites on the main arterial roads would be better used for long-term accommodation</li> </ul>	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	<ul style="list-style-type: none"> <li>I am strongly in favour of restricting new short stay accommodation and am supportive of the idea to restrict this in residential areas. I am not sure about the inclusion of entire arterial routes.</li> </ul>	
Support new hotel/ short stay acc. anywhere in Oxford.	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Draft Policy E5 artificially throttles supply just when the Plan itself recognises “strong demand” and the economic value of longer visitor stays.</li> <li>A broader criteria-based policy would allow under-used brownfield land or mixed-use schemes anywhere in Oxford to add rooms, easing pressure on both residential rents and weekend traffic without sacrificing quality, because applications would still need to satisfy access, noise and H8 “no loss of dwellings” safeguards.</li> <li>In a land-constrained city, expanding capacity, rather than rationing locations, is the surer route to a vibrant visitor economy and a healthier housing market.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Outside city and district centres, resist new short stay acc. anywhere in the city	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Hotels and proper B and Bs should be encouraged in non- residential areas, but other short stay accommodation restricted as much as governments rules allow. Air Band B and similar businesses cause the loss of homes and often result in nuisance for neighbours. In addition, they lack proper controls on fire and other risks.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
Rely solely on National Policy	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Try to be as un-prescriptive as possible, let the market, supply and demand, define what is provided/invested in.</li> <li>The Council should not be meddling in area. They will just make everything more expensive.</li> <li>Should encourage more 3 and 4 star hotel capacity</li> <li>Council policies ought to focus on reducing this growth and prioritise residential housing.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Further restrict new hotels/ short-term lets.	<p>Responses include:</p> <ul style="list-style-type: none"> <li>We need to keep Oxford a place where people can live. no more short stay accommodation, hotels etc. I am not sure which one of the options to choose but you need to really stop Airbnb and chains. its destroying oxford</li> <li>No need for additional short stay accommodation in the City centre.</li> <li>Where a short-stay accommodation is proposed in the centre, it should be either long-term accommodation or a service, like a convenience store, an event's venue, anything for the community.</li> <li>Many other cities have, for example, restricted Airbnb's.</li> <li>Tourism has a disproportionate impact and can price out residents from their own cities. Tourists, unlike students, do not live in Oxford,</li> </ul>	<p>The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
	<p>they are not residents, they do not vote for you. You represent the residents.</p> <ul style="list-style-type: none"> <li>• Do not allow more Airbnb type accommodation</li> <li>• Why is there no Option 2: resist expansion of short-stay accommodation! And do not protect existing short-stay accommodation!</li> <li>• We do not need more short-stay accommodation. We need residential communities.</li> <li>• You can create a different economy instead. Use buildings for long term housing and for shops and service for residents, or as highlighted in another section, for other businesses offering employment.</li> </ul>	
Do more with student acc. to support tourism	More use should be made of university accommodation to house tourists within the city rather than using our existing space to accommodate people who don't live & work here.	Preferred option selected for reasons set out in Background Paper.
Evidence/ audit of existing hotels needed	Oxford City Council's Planning Department has been suffering from 'hotel fever' for some time. The provision of short-term accommodation when many tourists are coach visitors and will not stay in Oxford means that an independent assessment is needed to judge whether current short stay accommodation is sufficient to meet actual demand at present, and projected demand based on post-Covid trends.	<p>A Hotel and short stay accommodation study forms part of the evidence base.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
Are more hotels needed?	<p>Does Oxford need more accommodation for tourism?</p> <p>The City is overrun with coaches and large groups in the centre overwhelming local people on the pavements. Of course, Oxford is a heritage site, but surely there must be limits or people will be put off visiting as it becomes so unpleasant.</p>	Preferred Option selected for reasons set out in Background Paper.
Don't lose housing to Airbnb/ short lets	Really important that we don't lose too much housing to Airbnb or short lets.	The Government is in the process of introducing specific legislation to address short lets (including Airbnb). However, permitted development rights exist for temporary changes of use. Other policies in the plan protect against the loss of dwellings.
Already a lot of hotels in Oxford.	<p>There also seem to be a great many hotels in Oxford. Oxford is diminishing with too much tourism - how much do tourists actually spend, for example?</p> <p>The streets and experience of the city is much less than it was 20 years ago...we don't want to be the next Venice or Barcelona!</p>	Preferred Option selected for reasons set out in Background Paper.
New hotels/ short stay acc. Should not impact residential dwellings	Given the number of hotels/amounts of short-stay accommodation currently in the pipe-line, I think that OCC need to draw a line. I think that new accommodation should only be agreed with the proviso as stated in the draft	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	<p>plan that it does not result in the loss of a residential dwelling OR the site is not suitable for provision of residential dwellings.</p>	
General comments	<p>Tourist accommodation should not be a priority when there is a housing crisis for local people.</p> <p>Should consider a tourist tax to stay</p> <p>Tourist taxes and other measures to restrict tourism will lead to worse finances for Oxford.</p> <p>Most tourists are day trippers. Do we really need more accommodation?</p> <p>Please consider existing communities before allowing permission for new developments.</p> <p>Tourist should rely on hotels or similar</p> <p>Too many hotels and student blocks already- to the detriment of affordable housing</p> <p>Restricting to arterial roads only is unhelpfully strict.</p> <p>More and more people are using Airbnb. This policy doesn't seem to have a huge impact.</p> <p>If tourist accommodation is lost to housing, then that is a good thing!</p> <p>This policy is weak around supporting a fair use of short stay accommodation in the centre that would not protect against loss of accommodation for workers and student</p>	<p>Local Plan seeks to balance competing needs including for new tourist accommodation and new homes.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>

Topic	Summary of comments	Response
(Existing Tourism etc) support expansion in city and district centres and at arterial routes.	Support preferred option.	Support noted.
(Existing Tourism etc) do not include a policy	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Try to be as unprescriptive as possible, let the market, supply and demand, define what is provided/invested in.</li> <li>Stop meddling!</li> <li>Why would you protect it? If there is demand let it expand if not let it be removed.</li> <li>The Council is busy creating more and more policies and restrictions which just add cost to developers and to Council officers.</li> </ul>	Preferred Option selected for reasons set out in Background Paper.
Do not support expansion of existing short stay acc.	<p>Reasons include:</p> <ul style="list-style-type: none"> <li>Allowing the expansion of existing short-stay accommodation risks further increasing housing costs and reducing availability for local residents. Protecting these accommodations without strong restrictions may encourage more properties to be converted from long-term homes to tourist rentals, worsening the housing crisis. I believe stricter controls or limitations are needed to prioritise</li> </ul>	Preferred option selected for reasons set out in Background Paper

Topic	Summary of comments	Response
	<p>affordable housing for the community over tourism-related short stays.</p> <ul style="list-style-type: none"> <li>• No, as above, be very cautious about expansion of short stay accommodation - the criteria would need to be very tight!</li> <li>• The expansion of short-stay accommodation should be resisted. We need long-term homes for ordinary people, not yet more tourist accommodation.</li> </ul>	
Temporary changes of use	Consideration given for alternative use even for a period of time. Could mean classification/license not lost but paused? could be very helpful with temp accommodation pressures.	Permitted development rights allow temporary changes of use already without the need for planning permission.
(Existing) - what are criteria?	Thought would have to be given to the criteria, and I am very concerned about the number of properties being illegally used for short lets (i.e., they are not properly registered).	<p>The criteria were listed in the main policy document.</p> <p>Preferred Option selected for reasons set out in Background Paper.</p>
General comment	Locking every hotel or guesthouse into perpetual tourist use would hamper the city's ability to repurpose sites for higher-value needs—especially housing—when market signals change; Oxford's land base is tight, and flexibility is paramount.	Preferred Option selected for reasons set out in Background Paper.

Topic	Summary of comments	Response
	<p>By simply allowing expansion where viable and applying the usual design, transport and amenity criteria to any proposed loss, the Council can safeguard visitor beds when demand is strong while still freeing under-performing premises to become homes, labs or mixed-use schemes when that better serves residents and the wider economy. A light, criteria-based approach keeps supply responsive instead of ossified, advancing both tourism and housing objectives without unnecessary regulation.</p>	
General comment/ clarity issues	<p>Not clear what short stay means, is this hotels? Probably don't need more hotels in Oxford. Don't allow Air B&amp;B and second homes for tourism rents.</p>	<p>Preferred Option selected for reasons set out in Background Paper.</p>
General comment	<p>Seems that this needs more work, guiding/regulation any short stay accommodation is important.</p>	<p>Preferred Option selected for reasons set out in Background Paper.</p>

## Statutory Consultee - Draft Policy E5

No statutory consultee comments.

## All Public Responses to the Whole of Chapter 3

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
Chapter 3	Economic Strategy	<p>As expressed in previous consultation responses, we have a fundamental concern about the very significant imbalance between the high number of jobs in the city and the much lower number of economically active residents, which has led to many problems including high levels of commuting into the city, traffic congestion, a shortage of housing and very high housing costs. We would like to see more being done to ensure that people can live in Oxford closer to their jobs.</p>	<p>The plan's strategy for employment and housing reflect the different relative positions in terms of need. (i.e., unable to meet housing need within city, whereas given strong supply of employment floorspace Oxford is likely to be in a strong position able to meet employment land needs). The plan's employment strategy seeks to limit new employment generating uses to existing employment sites, the city and district centres and sites in lawful use for the proposed employment use class and introduces a generally permissive approach in relation to housing delivery across the existing employment site network.</p>

<b>Draft policy</b>	<b>Topic</b>	<b>Summary of comments</b>	<b>Response</b>
Chapter 3	Support commitment to inclusive growth	Support commitment to inclusive growth, where wealth is distributed and all citizens can share the benefits of growth. Would like to see this commitment more strongly and explicitly in the plan.	Support noted. Policies E3 and E4 provide policy support for inclusive growth in the plan.
Chapter 3	Supportive	Cyclox support all policies in this chapter	Support noted.



