

**Draft Statement of Common Ground between Oxford City Council
and Oxford Health NHS Foundation Trust**

Submission Draft (Regulation 19) Oxford Local Plan 2045

May 2026

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and Oxford Health NHS Foundation Trust (the Trust), hereafter referred to as 'the parties'. This SoCG reflects the latest position on matters agreed by the parties with regards to the submission draft Oxford Local Plan 2045 and is provided without prejudice to other matters that the parties may wish to raise.

2.0 Background

2.1 The Trust provides physical and mental health care for people of all ages across Oxfordshire, Buckinghamshire, Swindon, Wiltshire, Bath and North-East Somerset. Its services are delivered at community bases, hospitals, clinics and in people's homes.

2.2 The Trust's aim is to improve the health and wellbeing of its patients and families. It works in partnership with a range of organisations including:

- Acute trusts and other NHS bodies
- The University of Oxford to promote innovation in healthcare, support research and to train doctors and psychologists;
- Oxford Brookes University and the University of Bedfordshire to train nurses and allied health professionals;
- Local authorities and voluntary organisations; and
- GPs across all the locations served by the Trust to provide integrated care.

2.3 With over 5,000m² of floorspace located across 30 unique, mostly ageing sites in the city, the Trust's estate is large, inefficient and in urgent need of transformation. It has expanded to reflect the diverse nature of the organisation it serves with its core infrastructure located at The Warneford Hospital (mental health), The Fulbrook Centre (City Community Hospital within the Churchill Hospital grounds), Murray House in north Oxford (community services), The Slade (CaHMS and Learning Difficulties), and Littlemore Mental Health Centre (mental health, forensics and the Trust's HQ).

2.4 In addition, there is a significant number of flexible, more specialist assets such as Luther Street Medical Centre (homeless GP service) and Manzil Way Resource Centre dispersed across the whole city along with a large, transient grouping of buildings typically used by community teams and the Trust's talking therapy services on a more ad-hoc basis.

2.5 The nature of the Trust's dispersed estate is largely the product of organic / ad-hoc growth, much of which has taken place in the last 10-15 years following legislative changes (brought about mainly by the Health and Social Care Act 2012) which resulted in former Primary Care Trust properties being

transferred to the Foundation Trust (examples include The Fulbrook Centre and Cornwallis House) or contractual changes as in the case of the Learning Disabilities Service which was novated to the Trust from Southern Health in 2015 along with the freehold interest in The Slade Hospital. To better understand its estate, the Trust is preparing a new Estates Strategy that will build on the Government's recently published white paper setting out the vision for healthcare across England for the next ten years. Further details relating to the Trust's strategic priorities for the city and wider Oxon area will be published later this year.

2.6 The Trust has ambitions to transform how care is provided across a number of core bases across the city including, but not exclusively, Manzil Way Resource Centre in Cowley, Slade House in Headington, and Littlemore Mental Health Centre. This follows the recently completed new healthcare hub created at Jordan Hill Business Park in north Oxford. The Trust's plans for Warneford Park are set out in planning application reference 25/01859/OUTFUL (approved subject to conditions at Planning Review Committee on 16.06.26); Warneford Park is therefore not covered within this SOCG.

3.0 Representations

3.1 Two representations were submitted on behalf of the Trust, one from Quod (on behalf of the Trust and University of Oxford, specifically in relation to the Warneford Park development, in which the Trust are the applicant) and the other from Arc Planning Associates on behalf of the Oxford Health Foundation Trust in relation to Trust's other sites.

3.2 This SOCG covers the representations made by Arc Planning Associates on behalf of the Oxford Health Foundation Trust in their letter dated 27 February 2026. The representations did not raise any concerns about legal compliance. The summary of the position in relation to Arc's comments on behalf of the Trust is set out below, with more detail contained in the table in Appendix A.

The following policies were considered unsound:

- Policy H4: Employer-linked affordable housing – not justified
- Policy H7: Houses in Multiple Occupation – not justified

3.3 The Trust also identified that Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to policy SPE8.

Policy H4

3.4 The Trust is positive about the principle of Policy H4, but is concerned that:

- Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach;
- Criterion (f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council.

3.5 The Trust have therefore requested a modification to remove criterion f i) to f iii) of the policy. The Trust have also suggested that Rectory Centre (Policy SPE12) be referred to in the policy.

3.6 The City Council's view is that Policy H4 allows an exceptional approach to affordable housing, to be applied only in exceptional circumstances. The criteria in the policy are necessary in order to ensure that the affordable housing that comes forward via this route is genuinely affordable to staff, and that this policy cannot be applied in a way that bypasses the need for affordable housing. Therefore, the City Council does not suggest any changes are made to the approach. The parties are not, therefore, in agreement regarding this policy. Further details are set out in Appendix A.

Policy H7

3.7 The Trust is positive about the principle of Policy H7 but considers criterion a) (relating to the proportion of HMOs in a 100-metre street length) should not apply to the Trust's sites. The Trust have therefore requested that an inclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.

3.8 Following explanation, the Trust is satisfied with the Policy H7 (see further details in Appendix A).

Policy SPE8: Manzil Way Resource Centre

3.9 The Trust identified that Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to SPE8. The City Council agrees and a main modification is proposed (see Appendix A).

Policy SPE12 – Rectory Centre

3.10 Both parties agree that the site can provide a mixed development of much needed new homes, that are aligned to meeting the housing needs of the city, and that the site can be re-developed to provide high-quality urban design where the siting, massing and design creates an appropriate visual relationship with the built form of the local area.

3.11 The Trust would like the policy broadened to include employer linked affordable housing. The City Council's view is that the site does not meet the criteria for employer-linked housing (see Appendix A), and no changes are made to the approach. The parties are not, therefore, in agreement regarding this policy.

4.0 Other Matters

Overall delivery of housing across the Trust's estate

4.1 The Trust is currently undergoing a review of how development across its estate may come forward, including outside the city. In acknowledgement that provision of health care services will always be of primary importance for the Trust, no minimum housing numbers have been included in the site allocation policies except for Rectory Centre, which, if it comes forward for redevelopment, will most likely be in single or almost sole use as housing, because of its size. For the purposes of the capacity assessment, 60 housing units were put nominally against Littlemore Hospital, although it was acknowledged that these may come forward spread across any of the Trust's properties in the city. Given that the current likelihood seems to be that the Littlemore Hospital site will be kept in hospital use, for the purposes of the capacity assessment these 60 units are instead nominally against the Slade

House site (although they may come forward as additional units at the Warneford, at Littlemore Hospital or at Manzil Way Resource Centre). The Trust still intends to bring forward this level of housing over the Plan period.

4.2 Appendix B sets out an agreed indicative timescale for delivery of housing units on sites within the Trust's ownership. These broad assumptions about delivery timescales for the capacity assessment/trajectory in no way precludes development commencing sooner if a future planning application moves more quickly, in the same way as the numbers in the Rectory Road site allocation policy are a minimum and do not preclude planning proposals for higher capacity numbers.

5.0 Concluding remarks

5.1 Both parties have been working closely together throughout the formulation of the Local Plan 2045 and in many matters are on alignment. This SoCG and the accompanying Appendices set out where common ground has been found following the Trust's representation to the Regulation 19 Plan. Whilst this additional work and engagement between the two parties has allowed us to find common ground, both parties will continue to work together on issues that arise during the examination process.

Signed on behalf of the Oxford Health NHS Foundation Trust



Title: Jeremy Philpot, Director of Estates & Facilities

Date:



Signed on behalf of Oxford City Council

Title: David Butler, Director of Planning and Regulation

Date: 18/06/2026

Appendix A- Oxford Health Foundation Trust Regulation 19 feedback and City Council Responses

The table in this appendix sets out the City Council's responses and proposed amendments to the Local Plan agreed with the parties to address their Regulation 19 comments.

Policy/paras/section	Summary of Trust comments	Oxfordshire	Health	City Council response	Proposed modifications	Oxfordshire response	Health	Trust
H4	Trust welcome Littlemore Mental Health Centre as a suitable location for employer-linked affordable housing in addition to the Trust's other assets at Slade House, Manzil Way, Rectory Centre and the Warneford Hospital. The Trust are however concerned that: Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach. Consider that criteria f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council. Therefore request that the policy is modified to read as follows: f) A legal agreement will be required to secure the benefits of this policy. In addition, the legal agreement will be used to: I. agree the allocations policy; II. agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months; III. agree that if the employer decides they no longer have a need for the housing, then the			The City Council's view is that Policy H4 allows an exceptional approach to be applied only in exceptional circumstances. The criteria in the policy are necessary in order to ensure that the affordable housing that comes via this route is genuinely affordable to staff, and that this policy cannot be applied in a way that bypasses the need for affordable housing. Therefore, the City Council does not suggest any changes are made to the approach. The parties are not, therefore, in agreement regarding this policy. A summary of the parties' positions regarding the Rectory Centre is shown below in the last row of this table.	No change			

	affordable housing requirements detailed under Policy H2 will be applied: The Trust suggest that Rectory Centre (SPE12) be referred to in the Policy.			
H7	The Trust considers HMOs offer an affordable solution for some individuals as opposed to renting individually or buying a property and recognises high concentrations of HMOs can result in changes to the character of the local area and can exacerbate amenity and parking issues. The Trust however, consider criterion (a) (relating to the proportion of HMOs in a 100 metre street length) should not apply to the Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites and it's considered that criterion (a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites. Trust therefore request that an exclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.	Policy H7 does not apply to purpose-built student accommodation or employer-linked housing (in general, unless they are brought forward in that particular way).	No change proposed	

SPE8 (Manzil Way Resource Centre)	Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to policy SPE8.	Modification proposed to the policies map and map to correct this.	Propose Modification to policies map, Manzil Way Resource Centre to be labelled SPE8.	Main
SPE12 (Rectory Centre)	The Trust would like the site allocation policy to include employer linked affordable housing.	The site does not meet the criteria for employer-linked housing. The City Council understands that the small size of this site means that it is not suitable for accommodating housing alongside the existing Mental Health Trust uses, and that the intention is that it would only be delivered if the current function can be moved elsewhere within the Trust's estate. That means that this site is very suitable for general housing (or, given the district centre location it could also be student accommodation). There is therefore no need for the employer-linked housing approach, which is intended mainly to help housing come forward on sites that would not otherwise be suitable.	No change	

Appendix B - Delivery Tables

The following tables provide a summary of Oxford City Council's delivery assumptions about sites within the Trust's ownership. Oxford City Council's broad assumptions about delivery timescales for the trajectory in no way precludes development commencing sooner if a future planning application moves more quickly, in the same way as the assumed numbers do not preclude planning proposals for higher capacity numbers. The understanding between both parties is that the Trust intends to bring forward housing over the Plan period within its estate, but the details of exactly how the estate is developed are still evolving. Therefore, for the purposes of the SHLAA, most of the anticipated delivery of homes is nominally against Slade House, but it may come forward differently within the Trust's estate.

Site name	Littlemore Mental Health Centre			
Site allocation reference in OLP2045	SPS9			
SHLAA reference	33			
Minimum number of dwellings in OLP2045 policy (if applicable)	0			
Delivery estimate	Years 1-5 2025/26-2029/30	Years 6-10 2030/31-2034/35	Years 11-15 2035/36-2039/40	Years 16-20 2040+
	0	0	0	0
Current planning status	Emerging (LP2045) site allocation. No min. No in policy as numbers have been put against Slade House.			

Site name	Slade House			
Site allocation reference in OLP2045	SPE15			
SHLAA reference	124			
Minimum number of dwellings in OLP2045 policy (if applicable)	0			
Delivery estimate	Years 1-5 2025/26-2029/30	Years 6-10 2030/31-2034/35	Years 11-15 2035/36-2039/40	Years 16-20 2040+
	0	0	60	0
Current planning status	Existing (LP2036) and emerging (LP2045) site allocation.			

Site name	Rectory Centre			
Site allocation reference in OLP2045	SPE12			

SHLAA reference	428			
Minimum number of dwellings in OLP2045 policy (if applicable)	21			
Delivery estimate	Years 1-5 2025/26-2029/30	Years 6-10 2030/31-2034/35	Years 11-15 2035/36-2039/40	Years 16-20 2040+
	0	21	0	0
Current planning status	Existing (LP2036) and emerging (LP2045) site allocation.			

Site name	Manzil Way Resource Centre			
Site allocation reference in OLP2045	SPE8			
SHLAA reference	574			
Minimum number of dwellings in OLP2045 policy (if applicable)	0			
Delivery estimate	Years 1-5 2025/26-2029/30	Years 6-10 2030/31-2034/35	Years 11-15 2035/36-2039/40	Years 16-20 2040+
	0	0	0	0
Current planning status	Existing (LP2036) and emerging (LP2045) site allocation. No min. number in policy as numbers have been put against Slade House.			