Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Dawn Brodie - Planning Agent on behalf of Royal London

Organisation (if applicable): Royal London Mutual Insurance Society

Address: [redacted]

Email:

Date: 13/03/2026

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We cannot accept anonymous comments.

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	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	○	◉
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

13 March 2026

Planning Policy
Oxford City Council
Town Hall
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OX1 1BX

Dawn Brodie
[redacted]
savills.com

By Email: planningpolicy@oxford.gov.uk

Dear Sir / Madam

OXFORD LOCAL PLAN 2045 REGULATION 19 CONSULTATION: SUBMISSION DRAFT LOCAL PLAN

Savills is instructed by Royal London Mutual Insurance Society (hereafter referred to as "RLMIS") to submit representations in respect of the Oxford Local Plan 2045 Regulation 19 Consultation: Submission Draft (January 2026).

RLMIS is providing comments on the plan on the basis of interests in the City which include a site at ARC Oxford (formerly Oxford Business Park). This letter builds on our previous representations to the Regulation 18 consultation for the Oxford Local Plan 2042 and the Oxford Local Plan 2040, which was withdrawn from examination following the Inspector's recommendations.

In general, RLMIS is supportive of the content and overall direction of the draft Local Plan. Notwithstanding this broad support, we set out below a number of comments for consideration. These representations are submitted in a constructive spirit, with the objective of ensuring that the Local Plan has the best possible prospect of being found sound at the forthcoming Local Plan Examination.

Chapter 1 – Introduction and Strategy

RLMIS support the vision to provide a healthy and inclusive City with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges. The overarching threads of the Plan are acknowledged including the need to address climate change, reducing inequalities and the creation of a liveable city.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
S4: Plan	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

The policy states that the policies in the Plan have been viability tested and planning applications that fully comply with them will generally be assumed to be viable. While RLMIS agree with the Council that developers are expected to have considered the financial implications of policy requirements, including affordable housing and net zero carbon, and local market indicators, when purchasing the land for development, RLMIS are

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concerned that the cumulative policy cost has not been sufficiently considered and creates unfavourable conditions for future investment in the City.

Proposed policies will add cost and uncertainty to the planning process, as well as substantial cost to the construction of new developments and refurbishments. The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability.

Following recent experience, rapid economic changes such as the recent pandemic, conflicts in Ukraine, Iran, and the wider Middle East and increases in interest rates can have a significant, volatile and long-lasting market impact. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. The overarching concern is that proposed employment uses would be materially affected by the cumulative cost of proposed policies. This is in addition to amendments to the City's CIL Charging Schedule adopted in mid-August – which resulted in a fivefold increase for R&D uses from £33.74 psm to £172.28 psm.

Those increased costs will ultimately be reflected in rents charged to occupiers. Increasing the cost of occupation for these companies, on top of tax rises including National Insurance and Business Rates, will reduce the funding available for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation.

While RLMIS do welcome the mechanism introduced under Policy S4 for net zero and/or affordable housing contributions to be reduced or removed entirely from employment-generating uses via a viability cascade, this very process adds further cost and uncertainty to the planning process. These comments are also made notwithstanding RLMIS's separate comments on net zero and/or affordable housing policies set out further in this letter.

RLMIS request that that both the Council and Inspector's robustly review the viability assessment prepared by BNP Paribas and ensure appropriate consideration is given to the cumulative policy cost to ensure Oxford remains a favourable and attractive place to invest.

Chapter 2 - A Healthy and Inclusive City to Live in

This chapter sets out the strategy to deliver new housing for the City and to provide for all types of household needs and circumstances, including families, single people, the elderly and those with special needs. RLMIS recognises that Oxford has acute housing pressures that need to be addressed, both in terms of overall supply and housing affordability.

It is noted that Policy H1 (Housing Requirement) sets out the Plan's provision to provide at least 9,267 new homes to be built in Oxford over the plan period 2025-2045 (average of 463 per annum). This will be from a mixture of site allocations, promoting efficient use of land and allowing an element of housing on all employment sites if suitable. The standard method housing need calculation for Oxford City calculated in December 2024 is 1,087 dwellings per year. Therefore, the Plan does not fulfil the full housing need identified under the Standard Method and the Council sets out they are unable to meet their housing need within the City alone.

RLMIS supports the Council's ambition to maximise housing delivery in the City and encourages the Council to fulfil its obligation to meet its housing need. However, RLMIS objects to Policy H3 (Affordable Housing Contributions from other development types for the reasons set out below.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:	
H3: Affordable Housing Contributions from Other Development Types	Yes	No	Object	Positively Prepared	X
				Justified	X
				Effective	X
				Consistent with National Policy	X

RLMIS recognises the need for affordable housing delivery in the City, particularly due to the high costs of housing, and the inability of the Council to address its housing need within the City alone. Whilst it is important to meet this need, RLMIS objects to Policy H3 (Parts (e) and (f)) in relation to the Council's approach to seeking affordable housing financial contributions from new commercial development (i.e. 'proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment-generating use, delivering a net gain in floorspace of 1000sqm GIA or more').

Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line. All of these contributions are directly related to major commercial developments and recognised by RLMIS as necessary to ensure the impacts of commercial development in the City are mitigated. These contributions are in addition to Community Infrastructure Levy which has increased fivefold since mid-August 2025. We are concerned the requirement for a further financial contribution towards affordable housing would further increase the cumulative policy cost and create an unfavourable environment for economic investment in the City. This would undermine the deliverability of the plan's economic objectives through rendering investing in the City unfavourable and unviable, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions.

The NPPF and NPPG only make reference to seeking affordable housing from major residential developments. There are no references to affordable housing contributions or provision being made from commercial development. There is no certainty that planning obligations under this policy will actually deliver affordable housing in the City as the City has confirmed it is unable to meet its housing need figure. There is no ability to ring fence the obligations to the identified workers being generated from commercial developments, or even if those workers would qualify for affordable housing. In fact, the background paper on affordable housing (reference BGP-002 Affordable Housing Reg 19) prepared by the Council states that: "*Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing*".

The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. The level of contribution is an arbitrary figure and has not been sufficiently demonstrated to be at a level to mitigate any identified need or impact. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield.

The policy also assumes that all new commercial development will generate entirely new jobs for the City and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. The policy assumes all jobs will be newly created which is rarely the case in major commercial developments.

In summary, we consider that seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation

is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms. We appreciate that such an obligation would enable sums of money to be collected for affordable housing. However attractive that proposition may be, the fact that a policy will generate substantial financial contributions is not in itself a reason to include it in a development plan and does not mean the policy is justified or meets the tests of Regulation 122.

We would also like to note that a similar Policy was proposed in the Westminster City Plan 2019-2040, which was examined in 2020. That policy (Policy 10 of the Submission Draft) included a requirement for contributions from certain commercial developments (as defined in that policy). The Inspector's recommended that the Policy be removed (which it was in the Adopted Plan). In coming to their conclusion, the Inspector's noted that the policy requirement "*would simply require financial contributions to the City-wide Affordable Housing Fund. It would not achieve the key objective of the submitted Policy 10*" (paragraph 85) to ensure mixed, inclusive and cohesive communities.

RLMIS has no comments on aspects of Policy H3 relating to seeking affordable housing contributions from new purpose-built student accommodation and from self-contained older persons accommodation.

Suggested Amendment to Policy H3: Affordable Housing Contributions from Other Development Types
Policy H3 should be amended to take account of the following changes: First Paragraph: Delete references to "*and new employment-generating uses*". Parts (e) and (f): Delete these requirements.

Chapter 3 – A Fair and Prosperous City with a Globally Important Role in Learning, Knowledge and Innovation

The chapter recognises the global reputation of Oxford in terms of economic assets and innovation. The City is characterised by the presence of the two universities and teaching hospitals and this provides an attractive location for a range of companies which include medical research and life science sectors, which is reflected in the significant investment in the City to date. This results in a number of 'spin-out' businesses due to the availability of graduates. The policies in this chapter seek to maintain the vitality of the employment industry but noting that this needs to be balanced in the context of the competing demands for meeting the needs for housing in Oxford. This is recognised by RLMIS as a key issue for the City and development proposals within it.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
E1: Employment Strategy	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

Policy E1 sets out an employment strategy for the City supporting intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre. RLMIS supports this approach to meet the Cities employment needs, while preventing employment uses on non-designated employment sites to balance other uses, in particular housing.

We consider that designated employment sites, such as ARC Oxford, are the best locations to support intensification of employment uses to meet employment needs.

RLMIS has no plans at this time to deliver housing on its site at ARC Oxford, but recognises housing is a key locational consideration for companies. Therefore, RLMIS recognises and supports the scope for allowing some housing on employment sites provided it supports their economic function as part of Policy E1.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
E4: Affordable Workspace	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

RLMIS welcomes the revisions made to the affordable workspace policy to now require commercial development over 5,000 sq.m. to produce an affordable workspace strategy (AWS), rather than require a specific percentage of floorspace to be delivered for affordable workspace. This will enable greater flexibility and deliver solutions suited to different sites and local needs. However, RLMIS continues to have comments on how these strategies will be applied in practice.

Affordable workspaces are defined in the local plan as workspaces which should be provided using a discounted or “alternative” rent model, and/ or by providing suitable premises to meet end-user requirements (i.e., through the provision of a specific use class). There is no reference or definition to what these rent models may comprise or what is considered a ‘discounted’ rent.

AWSs are defined in the glossary of the local plan as a strategy which sets out the details of the affordable workspace to be delivered on site which will include details of the size, marketing, servicing, management and how the space provided will meet end-user requirements.

It remains unclear what type and level of detail will be considered acceptable in respect to the size, marketing, servicing and management for affordable workspace. 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.

It is acknowledged that the Council intends to prepare a Technical Advice Note (TAN) that expands on various aspects of the policy (including advice on how to prepare an affordable workspace strategy, implementation of the policy and monitoring) to support the delivery of the policy. It is requested the affordable workspace definition contained in the glossary of the local plan is amended to provide greater clarity on what constitutes start-up and early-stage businesses or introduce a new definition for SMEs to enable greater clarity on who would qualify for affordable workspace.

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water, and Soil, and Aims for Net Zero Carbon

Chapter five of the Local Plan primarily relates to the use of resources and carbon emissions. RLMIS acknowledge the Council’s declared ‘Climate Emergency’ and are committed to providing sustainable development. In relation to the specific policies set out in the draft plan the comments below are provided.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:	
R1: Net Zero Buildings in Operation	Yes	No	Comment	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	

Policy R1 sets out the requirements to ensure all new buildings should be net zero carbon in operation.

While RLMIS supports the policy wording enabling higher EUI target for non-residential uses with exceptionally high energy demands, including R&D/labs/hospitals, RLMIS objects to requiring all energy needs to be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage and then seeking to meet the remaining energy balance through installation of sufficient additional renewable generation at a location offsite.

Given the high energy needs for lab buildings, it is wholly unrealistic for all energy needs for lab buildings to be met on site through renewable energy. Integration of energy storage could conflict with the effective use of land for employment needs and is arguably incompatible with high quality design and placemaking requirements for major employment sites, largely due to the space and design requirements for energy storage, such as battery energy storage. This could detract from the overall design aims of an employment site or the surrounding area. Given the constrained land available for development in the City, which the Council recognises in their inability to meet their housing needs, it is also wholly unrealistic to deliver additional renewable energy generation at a location offsite, particularly with the local plan not identifying any site allocations for the purposes of renewable energy generation. Therefore, the default position for non-residential uses with exceptionally high energy demands will be provision of some energy needs on site and contributions towards the Carbon Offsetting in a scheme which will be managed and operated by the Council. It continues to remain unclear from the papers available at this stage how the Council will utilise these contributions within the City and no fund, or schemes have been established to ensure that the contributions truly deliver necessary offsetting. Therefore, the policy is not effective in delivering its aims and objectives in respect to non-residential uses with exceptionally high energy demands.

Neither the NPPF nor NPPG stipulate that all energy needs should be met on site. In addition, draft Policy PM13 (Setting Standards) within the draft NPPF (2025) seeks to limit local standards for energy efficiency, as the government are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, and should not cover matters which are already addressed by Building Regulations. Therefore, the policy is not justified.

While the draft NPPF (2025) remains in draft, it is considered that the Council should acknowledge the Government's concern and align with the national net zero carbon agenda and timescale, in line with the principles in the proposed Future Homes/Buildings Standard (which apply to regulated energy only) where compliance is measured via national Building Regulations calculations (e.g. SAP/ SBEM) demonstrating carbon reduction over notional building. This will meet the objectives of the plan but does not put further financial obligations on high growth sectors such as life sciences.

Suggested Amendment to Policy H3: R1: Net Zero Buildings in Operation

Policy R1 should be amended to require developments to comply with Building Regulations to align with the national net zero carbon agenda and timescale.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
R2: Embodied Carbon in Construction	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

Policy R2 relates to embodied carbon in the construction process seeking to ensure this is minimised as far as possible. It is noted that neither Building Regulations or national policy currently require embodied carbon to be assessed. Therefore, RLMIS considers the approach adopted by the Council to be proportionate and reasonable to require developments to include high level principles for limiting embodied carbon and only require submission of Whole Life Cycle Carbon Assessments for larger applications (developments of 100 or more dwellings, or 10,000m2 or more non-residential floorspace).

This will enable flexibility for future development in the city which will ensure embodied carbon principles are incorporated but not requiring specific targets which may be challenging to meet. In principle this approach is supported by RLMIS however, the policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
R3: Retrofitting Existing Buildings	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

RLMIS support this policy where buildings are retained. We do, however, note that not all buildings are suitable for conversion and the policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.

Chapter 8 – Infrastructure and New Development

This chapter sets out the site specific allocation policies for the Local Plan, as well as specific policies relating to infrastructure delivery.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
CBLAOF: Cowley Branch Line Area Of Focus	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

RLMIS strongly supports the proposed approach of identifying South Oxford as part of the Cowley Branch Line Area of Focus, which includes ARC Oxford. The area presents significant regeneration opportunities and potential for high-density developments, supported by public transport improvements. Particular focus on improving public transport to this area of the City is welcomed, including the reopening of the Cowley Branch Line (CBL) where a new station is proposed south of the Business Park.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
SPS2: ARC Oxford	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

RLMIS strongly supports the continued allocation of the site for employment and the site being appropriate for development or redevelopment that modernises and intensifies the employment provision. RLMIS welcomes specific reference to portions of the allocation suitable for higher buildings, notably along the Garsington Road / Eastern Bypass frontage, where development can be grouped together and will help to better define key gateways / routes.

The site is in multiple ownership which brings inevitable uncertainty around whether a deliverable comprehensive masterplan which covers the whole site will be forthcoming, and the status of any such masterplan that is prepared. RLMIS welcome that the policy references that where proposals for individual plots come forward, they should identify how they will align with / comply with an overall strategy. This will enable the redevelopment of the sites to come forward without conflict with the wider aims and ambitions for the site. At the time, there is no overall strategy which exists for ARC Oxford. Therefore, the policy wording is suggested to be revised to clarify alignment with an overall strategy should be made 'where one exists.'

Suggested Amendment to Policy SPS2: ARC Oxford

Policy H3 should be amended to take account of the following changes:

Paragraph b) revised to:

A site-wide landscaping and public realm strategy for the site is encouraged and proposals for individual plots should then identify how they will align with/ comply with the overall strategy **where one exists**. Site-specific landscaping schemes should be prepared in accordance with Policies G2, G3, G4 and G5.

We trust that the above comments will be taken on board in a constructive manner in order to provide a Local Plan that meets the requirements of the NPPF, including being flexible, deliverable and sound.

If you have any questions in relation to this representation, please do not hesitate to contact me.

Yours faithfully,

[redacted]

SAVILLS