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Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Paul Comerford

Organisation (if applicable): Prior + Partners

Address: [redacted]

Email: [redacted]

Date: 13/03/26

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Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☐ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

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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?	◉	○
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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.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number		Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	☐ Yes	☐ No
(b) is sound?	☐ Yes	☐ No
	☐	☐

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☐	(c) effective?	☐
(b) justified?	☐	(d) consistent with national policy?	☐

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

PRIOR + PTNRS

to

Planning Policy Team
Oxford City Council
Town Hall,
St Aldate's,
Oxford,
OX1 1BX
Emailed to: planningpolicy@oxford.gov.uk

date

13th March 2026

subject

Local Plan 2045 - Regulation 19 response

Dear Planning Policy team,

This representation is submitted by Prior + Partners on behalf of Firoka to the Oxford Local Plan 2045 Regulation 19 Proposed Submission Consultation (hereafter referred to as 'the Reg 19').

Firoka has significant land interests within the Oxford City Council (OCC) administrative boundary and is promoting a number of these for development. Firoka therefore welcome the opportunity to consider the Reg 19 and to provide overall support for the plan's objectives and support the deliverability of key strategic regeneration opportunities provided by the emerging plan.

This representation is submitted specifically regarding the Kassam Stadium (Policy SPS7) and the Overflow car park (Policy SPS11), owned by Firoka, and explores whether the policies are effective, justified, and consistent with national policy. This representation proposes modifications where necessary to ensure the deliverability of these allocations, provide additional clarity and ensure consistency in interpretation at the application stage and are considered required for the plan to be found sound.

Kassam Stadium and Overflow Car Park

The Kassam Stadium site is a well-established location in south Oxford, currently accommodating Oxford United FC and a range of leisure and commercial uses. Since our reg 18 representation, the relocation of the Oxford United Football Club Stadium has been approved by Cherwell District Council. This replacement of the current stadium use from the site will therefore release the stadium site for development as a whole.

Firoka have appointed planning and masterplanning consultants alongside commercial advisors to prepare development capacity studies for the stadium and

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overflow car park sites that examine a viable balance of uses that responds to City, regional and National aspirations for the Cowley Branch Line Area of Focus. As referenced in the Regulation 19 site allocations, these capacity studies will inform a comprehensive masterplanning exercise covering both the Kassam Stadium and Overflow Car Park sites to ensure an integrated, coordinated and balanced proposal in line with City policy.

The redevelopment of the Kassam Stadium and Overflow Car Park sites represents one of the largest regeneration opportunities in south Oxford. Ensuring a clear and flexible policy framework will be critical to unlocking this opportunity and supporting the delivery of homes, employment space and improved connectivity.

Policy SPS7 - Kassam Stadium

Firoka broadly supports the SPS7 site allocation regarding the Kassam Stadium site. However, to ensure robustness, these representations draw out some comments and recommendations on the submitted site allocation policy wording, which are set out in turn below. Firoka wishes to strengthen certain aspects to ensure that the mixed-use aspect of the residential-led allocation can be delivered during the City Plan period and beyond. Given the scale and nature of the allocation which is linked to two adjacent sites, it is important that there is sufficient built-in flexibility to meet objectives whilst being adaptable to market changes to promote delivery.

Policy overview and masterplan approach

Policy SPS7 establishes the principle of residential development on the Kassam stadium site with for a minimum of 290 homes and recognises employment related use as acceptable as a 'secondary' use on the site. Firoka supports the explicit inclusion of employment uses and policy's recognition of the imperative to deliver housing to meet needs whilst also supporting economic growth, particularly as part of the wider strategic opportunity presented by the Cowley Branch Line reinstatement. This transformational project is considered further below.

The principle and identified scale of a residential development at SPS7 is supported, and in this context it is understood that the primary objective of Policy SPS7 is the delivery of the minimum housing requirement – namely the 290 homes forming part of the proposed housing trajectory. Once the minimum requirement has been met, it is understood that employment related uses and complementary uses are acceptable on site. Whilst we have concerns regarding that this hierarchy approach is not strictly justified, on the basis that employment related uses would follow a design-led approach but would otherwise not be capped in terms of scale for example, this policy can be supported. We would appreciate that additional supporting text is provided to recognise that 'secondary' in the terms of this policy refers only to the primary requirement to deliver the minimum number of homes on the sites and this is the basis upon which other acceptable uses are understood to be 'secondary'.

Firoka supports the inclusion of wording in Policy SPS7 which allows a flexible approach to how the required uses (namely residential, employment generating and other complementary uses) are to be distributed across the SPS7 and SPS11 sites,

supported by a masterplan that demonstrates how the required minimum housing numbers will be achieved overall. As noted above, Firoka is undertaking a masterplanning exercise that will establish a viable balance of uses that responds to aspirations for the Area of Focus which will facilitate the effective and coordinated use of land across the allocations and help ensure the policies remain deliverable over the plan period.

Given the scale, complexity and phasing requirements associated with the redevelopment of the Kassam Stadium and Overflow Car Park sites, it is essential that the policy framework retains this flexible and coordinated masterplanning approach.

Redevelopment of the Kassam Stadium and Overflow Car Park sites will be a large scale multi-phase development and interdependent with the stadium replacement scheme. As a result, it is possible that certain new uses will be developed across the sites before the stadium use is relocated. To ensure the effective and deliverable implementation of the allocations, it is requested that the supporting text clarifies that allocated uses may be developed across the sites prior to the removal of the existing stadium where this forms part of a masterplan strategy. This would provide appropriate flexibility to support early phases of development while maintaining the overall delivery of the allocation.

Open Space

As established above, Kassam Stadium is allocated for a mix of uses. Policy SPS7 sets out a requirement for 10% of the overall site area to be provided as open space. However, Policy G2 states that for mixed-use sites, only the residential area of use should be used for this requirement. Firoka notes this as an inconsistency in approach across the two policies which introduces uncertainty in the interpretation of the policy requirements and therefore risks affecting the effectiveness of the allocation. This inconsistency is also noted in Policy SPS11. Given that the site would already be covered by the requirements of Policy G2, it is considered this policy limb could be removed to remove this inconsistency.

Flooding

Firoka supports the proposed sequential approach to locating development on the site which is consistent with national policy. It is noted that, unlike Policy SPS7, Policy SPS11 establishes open space and car parking as suitable uses within Flood Zone 3. Given the Reg 19's approach to linking Policy SPS7 and SPS11 and the flexible approach to the distribution of uses across the sites it would provide consistency and clarity to establish this approach in SPS7 also. Firoka therefore requests that Policy SPS7 includes specific reference to parking and open space as suitable uses within Flood Zone 3 to resolve the internal inconsistency between the policies and to allow the cross-site masterplan to remain consistent with both allocations.

Movement and Access

Policy SPS7 establishes that vehicular access should continue to be from Grenoble Road and design should ensure there is easy circulation for vehicles to and from

site SPS11. Firoka supports this approach and notes that landowner control and an integrated masterplan allows an overall circulation and mobility strategy to be established which supports the Reg 19 aspirations for the Area of Focus.

Contamination

It is noted that Policy SPS7 cross references 'Policy R5' within the policy limb referring to potential contamination issues although Policy R7 deals with land contamination. It is requested that this cross reference is updated to 'Policy R7.'

Policy SPS11 – Overflow Car Park at Kassam Stadium

Firoka broadly supports the SPS11 site allocation regarding the Overflow Car Park at Kassam Stadium. However, to ensure robustness, these representations draw out some comments and recommendations on the submitted site allocation policy wording, which are set out in turn below.

Policy SPS11 establishes the principle of residential led development for a minimum of 100 new homes. In line with SPS7, the emerging plan sets out that a flexible approach will be taken to how the required uses are spread across the two sites, supported by a masterplan that shows how minimum housing numbers will be achieved overall, followed by employment generating and complementary uses. For reasons established previously, Firoka support this across the two linked sites. However, Policy SPS11 does not explicitly establish this approach and it is therefore requested that Policy SPS11 mirrors the wording of Policy SPS7 in relation to acceptable uses to ensure clarity regarding the distribution of uses across the two linked allocations.

Movement and Access

Firoka supports the approach to protecting, retaining and enhancing active travel routes with the site and wider Area of Focus. However, Policy SPS11 also identifies the potential for a restricted access from Priory Road. There are many potential design solutions for reducing the dominance of private vehicle circulation and impact and current design work has not been sufficiently progressed to evidence the need for a restricted access on site. Requiring a restricted access at this stage risks pre-empting the outcome of detailed transport strategy and masterplanning, which will be required to support future planning applications. The policy should therefore avoid over-prescribing the design approach, and should be limited to the key principles at the plan making stage.

Cowley Branch Line and Area of Focus

Firoka recognises the potentially transformational impact of the Cowley Branch Line reinstatement for Oxford City. By nature of their scale and location, Firoka's sites are a cornerstone to the realisation of the significant regeneration opportunities identified as a result of the project. Firoka supports the Area of Focus' placemaking objectives for active travel, quality design and environmental improvements. To achieve the Area of Focus' objectives it is recommended that the above requested changes to Policies SPS7 and SPS11 are made to achieve a clear, consistent and flexible policy framework for delivering the key sites.

The requirement for contributions from identified sites to the Cowley Branch Line project presented in the Reg 19 is supported at the concept level. The Reg 19's viability assessment indicates the assumed figure is at the edge of viability for some tested benchmark land values, however the policy provides a blanket requirement for new developments. Firoka note that the viability of this requirement on certain developments will be understood 'in the round' as part of the planning application process. Given the strategic importance of the Cowley Branch Line, it is appropriate that development contributes towards its delivery but this must not prevent viable delivery and the application of the policy should ensure that contributions do not prejudice the delivery of the allocated sites.

Figures 8.5 and 8.6, referenced as showing the extent of the buffer zone, are not included within the consultation document and the policy requirement is therefore not clear for examination purposes. The extent of the buffer zone and the sites that fall within must be clearly identified to ensure this policy is effective and provide certainty. Firoka therefore suggests the inclusion of a suitable reference plan to remove this uncertainty.

Policy H3: Affordable housing contributions from other development types

This policy seeks a financial contribution for the delivery of affordable housing from proposals for purpose-built student accommodation, new older people's accommodation and new employment-generating uses. According to the viability evidence base, a contribution will be sought from employment generating uses of 1000sqm or more based on £10 per sqm GIA.

Firoka is concerned that the policy does not give due consideration to ensuring the viability of essential employment uses, particularly where these are delivered as part of mixed-use schemes where the residential element is already subject to an affordable housing requirement. Firoka also notes that whilst the Local Plan Viability Assessment suggests this constitutes a 1-4% cost for other development types, the Reg 19 plan does not set out how this requirement meets Paragraph 58 of the NPPF. It is therefore not clear what identified harm or impact is being mitigated through the sought contributions such that the policy is not justified nor consistent with national policy, particularly on mixed use sites where the delivery of affordable housing is not prevented by the inclusion of employment generating uses.

As a result, Firoka proposes a modification to Policy H3 to ensure that a more nuanced approach to securing affordable contributions from mixed use sites will be considered at the application stage.

Policy E1: Employment Strategy

Policy E1 states that proposals for employment generating uses outside of designated Key Employment Sites, City and District Centres and existing employment sites not designated as Key Employment Sites will be refused. However, Policies SPS7 and SPS11 both allow employment-related uses on site. This presents an internal inconsistency within the Reg 19 which could prevent the effective implementation of Policies SPS7 and SPS11. This internal inconsistency risks rendering the allocation policies ineffective. Policy E1 should therefore

explicitly recognise that employment uses are acceptable where supported by site specific allocation policies.

Policy E4: Affordable Workspaces

Policy E4 sets out an expectation that affordable workspace is provided as part of the Kassam Stadium Development.

The policy does not provide a definition of affordable workspace nor a method for establishing the quantum of affordable workspace to be provided. This does not respond the finding in the Reg 19 Viability Assessment that a flexible approach to the scope of the discount may be required to ensure the viability of some developments. There is also an inconsistency with Policy H3 as E4 does not establish an approach to affordable housing contributions on non-residential uses where a proportion of that use is required to be rented at below market rate. As a result, Firoka requests the Council clarifies its requirements regarding affordable workspace provision on mixed use sites such that it can be confirmed this policy is justified. To be found sound and justified by the available evidence base, the policy should confirm that the level and form of provision will be determined through viability testing at application stage.

Policy C3: Protection, alteration and provision of local community facilities

Policy C3 states that permission will not be granted for development that results in the loss of community facilities unless in specified circumstance, a requirement consistent with national policy. Direct mitigation for the loss of community uses within the Kassam Stadium site will be provided by the approved stadium replacement scheme once implemented. Policy SPS7 nonetheless ensures that a community function and role – separate to community facilities- will be retained onsite and this is supported by Firoka. It is noted by Firoka that the requirement within Policy SPS7 relates to the function of community use on site rather than the type of use for which a suitable alternative has been identified and secured. Whilst no modification is proposed, this has been noted for clarity as this distinction is crucial to ensuring the soundness of the Kassam Stadium allocation requirements. Should the interpretation not be correct, it would likely result in a need for the modification of the current drafting in SPS7 on this item.

Policy HD2: Making efficient use of land

Firoka supports the expectation for high density development (over 80dph) on gateway sites. Both the Kassam Stadium and Overflow Car Park sites occupy a gateway location on Grenoble Road, a key route into the city, and have the potential to benefit from improved public transport connectivity associated with the Cowley Branch Line.

Paragraph 130 of the NPPF states that planning policies should support development that makes efficient use of land, particularly in locations that are well served by public transport. The expectation in Policy HD2 for densities above 80 dwellings per hectare on gateway sites is therefore supported. It will therefore be important that the policy framework allows sufficient flexibility through the

masterplanning process to optimise the capacity of these gateway sites, consistent with Policy HD2 and the expectation for efficient use of land.

Conclusion and Next Steps

In summary, Firoka supports the allocation of the Kassam Stadium (Policy SPS7) and Overflow Car Park (Policy SPS11) sites and the Local Plan's wider objectives to deliver housing, employment and regeneration in this part of south Oxford.

The two sites present a significant opportunity to contribute to the delivery of the Plan's housing targets and to support the wider placemaking ambitions associated with the Cowley Branch Line and Area of Focus.

Whilst they do not speak to the fundamental soundness of the allocations, a number of internal inconsistencies have been identified between policies within the Reg 19 Plan, including those relating to open space provision, acceptable uses within Flood Zone 3, and the relationship between the site allocation policies and Policy E1. Paragraph 16 of the National Planning Policy Framework requires plans to be clear and unambiguous so that it is evident how a decision maker should react to development proposals.

The representations set out above seek to ensure that the relevant policies provide a clear, consistent and flexible framework to enable the comprehensive redevelopment of these linked sites. The requested amendments are intended to provide greater clarity on policy requirements whilst maintaining necessary flexibility to respond to viability, phasing and evolving masterplanning considerations.

Should it be helpful to discuss any aspect of this representation, potentially as part of a statement of common ground, we would be happy to assist.

Yours sincerely,

[redacted]

Paul Comerford
[redacted]