

Oxford Local Plan 2045 Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:

Olivia Russell

Organisation (if applicable):

CBRE Ltd.

Address:

[Redacted]

[Redacted]

[Redacted]

Email:

[Redacted]

Date:

13.03.26

Data protection:

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.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

Do you wish to speak at the examination hearings?

(Please note that the Inspector will decide who to invite to speak)

Yes ☒ No ☐

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.

DETAILS OF YOUR COMMENT

Part B

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.

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

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

Paragraph		Policies Map	SPS16
Policy Number	SPS16	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 not: (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 refer to representations submitted by CBRE on behalf of ORVIL.

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 refer to representations submitted by CBRE on behalf of ORVIL.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

Oxford City Council
Planning Policy Team
Town Hall
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OX1 1BX

12 March 2026

Oxford Local Plan 2045 – Regulation 19 (Proposed Submission Draft)

Dear Planning Policy,

We write on behalf of our client Oxford Re Value Investments (ORVIL), in response to the Oxford City Council (OCC) Local Plan 2045 Regulation 19 (Proposed Submission Draft) Consultation. ORVIL has a significant land interest within Cowley District Centre, at Templars Square Shopping Centre (hereafter referred to as the 'site'). Within the Proposed Submission Version Local Plan 2045, the Templars Square site allocation is identified under **Policy SPS16**. A Site Capacity Assessment has been published as supporting information.

There is an urgent need for new homes in Oxford City. Templars Square is capable of delivering a significant housing contribution to meet the City's housing needs alongside a mix of complementary District Centre land uses. In seeking to deliver a transformational regeneration scheme for Templars Square, site-specific development challenges exist which must be recognised when assessing a future development proposal against the emerging Local Plan policy requirements.

ORVIL participated in previous rounds of policy consultation with respect to the draft Oxford Local Plan 2040, prior to it being withdrawn in January 2025. ORVIL more recently submitted representations in response to the Oxford Local Plan 2042 Regulation 18 consultation that took place in August 2025. At the current Regulation 19 stage of the plan making process, the focus of consultation is whether the draft plan complies with legal requirements and meets the tests of soundness. The focus of these representations is whether it is considered that the draft policies prepared are judged to be **positively prepared, justified, effective and consistent with national policy**. As described below, we consider that some modification will be required to ensure the draft policies meet the soundness tests.

A new National Planning Policy Framework (NPPF) is currently out for consultation. Whilst there are transitional arrangements for plan-making, the decision-taking policies within the new NPPF will take immediate effect once the document is published in final form later in 2026.

Within the draft NPPF, the wording of presumption in favour has been interpreted to be strengthened, with a stronger tilt towards approval. Draft NPPF policies state that development should be approved "*unless the benefits of doing so would be **substantially** outweighed by any adverse effects*". The current NPPF states that in applying the presumption, any adverse impacts of a development would need to "*significantly and demonstrably outweigh the benefits*" to be refused. This reinforces the national goal of building 1.5 million homes, with housing delivery as a strategic priority.

ORVIL would welcome further engagement with OCC prior to the Local Plan Examination, and through preparation of a Statement of Common Ground in relation to the Site Allocation SPS16 and other relevant emerging policies.

Detailed representations

The redevelopment of Templars Square will make a significant contribution to meeting the aims of Draft **Policy S1** (Spatial Strategy and Presumption in Favour of Sustainable Development). The **SPS16** site allocation should be viewed as one of the most strategically significant opportunities for the City in terms of its ability to address and positively contribute to the aims and objectives of the emerging Local Plan.

Site Allocation: Templars Square

Chapter 8 of the Proposed Submission Version Local Plan includes the emerging site allocations. The Templars Square site is allocated under draft **Policy SPS16**, which confirms that planning permission will be granted for a mixed-use development at the site that supports its ongoing role within the District Centre, as well as delivering a “significant amount” of new residential development. The development principles of the site allocation are supported. The supporting Site Capacity Assessment rightly acknowledges that the site currently has a ‘dated’ appearance, is ‘inward facing’ and has limited engagement with its surroundings.

Figure 1 (left) shows the extent of the draft site allocation. **Figure 1** (right) is the corresponding 2045 Policy Map extract which shows the site allocation in the context of the wider District Centre (green dashed outline) and the Beauchamp Lane Conservation Area to the west (blue horizontal shading). In the surrounding area, the yellow shading relates to draft Policy G1 ‘Supporting’ Green Infrastructure Network, and the green shading relates to ‘Core’ Green Infrastructure Network. The blue shading strips relates to draft Policy C2: District Centre Active Frontage.



Figure 1 – Regulation 19 Templars Square Site Allocation (SPS16) and Policy Map Extract

Residential-led development 136.1 Policy H1 Unsound a. positively prepared, b. justified

As noted within Draft **Policy H1** (Housing Requirement) the government requires all councils to use a ‘Standard Method’ to calculate housing need. For Oxford, the Standard Method calculates a need of 1,087 homes a year.

At Regulation 18 stage, the Council put forward an interim capacity of 9,851 over the plan period, equating to 493 homes per year. The more recent Proposed Submission Draft refers to the lower SHLAA 2026 figure of 9,267 homes over the plan period (463 dwellings per annum).

The calculated housing need is greater than the capacity identified and there is a level of unmet need in Oxford. Whilst we acknowledge the Council is continuing to work with adjoining authorities to deliver sites in adjoining districts to help meet Oxford’s housing needs to address the unmet housing need, a local plan is generally not considered **“positively prepared”** if it fails to meet the area’s housing target, as national policy requires plans to, as a minimum, seek to meet these needs.

Local Plan 2045 Background Paper BGP 001 para. 5.11 refers to an Interim Statement of Common Ground providing details on the commitments towards Oxford’s unmet housing need in the adopted and emerging plans of neighbouring districts (as of January 2026). However, as these emerging plans are not adopted, it remains unconfirmed whether the City Council’s unmet need will be fully met.

The draft allocation **SPS16** confirms the minimum number of dwellings to be provided on the subject site is 500 (net gain). This change is supported since the previous (withdrawn) Regulation 19 Plan draft Policy SP12, which had a lower number (minimum 350 dwellings). It is considered that the revised minimum number of dwellings is more in line with the overarching local and national policy objectives to optimise developable sites on brownfield land, however given

the identified unmet need and reliance on the emerging plans of neighbouring authorities, it could be further emphasised that where sites such as Templars Square are optimised beyond the minimum identified, this will be supported.

Deliverability Considerations

Alongside the above, it needs to be ensured that the policy framework is flexible enough to enable sustainable brownfield sites such as Templars Square to maximise their contribution through taking a design-led approach to density and providing a public benefits package that is deliverable.

At Regulation 18, draft **Policy H2** stated the provisional minimum requirement of 40% of the net gain number of units as affordable housing was subject to further viability testing. It stated that at least 80% (also provisional requirement, subject to further viability testing) of the affordable units on the site should be provided as onsite Social Rented dwellings, and the remaining element of the affordable housing may be provided as intermediate housing on-site.

Further viability testing has since been published as part of the Proposed Submission Draft evidence base (Oxford City Council: Local Plan Viability Assessment Update, December 2025). This forms part of the Proposed Submission Draft evidence base. The Proposed Submission draft **Policy H2** maintains the '40% affordable housing requirement, comprising 80% as onsite Social Rented dwellings. The emerging Policy refers to "a minimum of 40% of units".

[136.2 Policy SPS16 unsound b justified, c effective, d consistent](#)

The BNP Paribas Viability Assessment Evidence Base Document concludes "*The results do not point to any particular level of affordable housing that most schemes can viably deliver, and we therefore recommend that a 40% target be adopted and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.*"

It recommends a "40% target" (not minimum), recognising there are significant variations in the percentages of affordable housing that are capable of being provided, depending on private sales values, scheme composition (i.e. flats or houses) and benchmark land value. The evidence base document also does not directly comment on schemes where there is re-provision of existing affordable housing proposed, and the viability implications of that. Crucially, the viability evidence base document recognises the importance of site-specific assessments. This should be recognised for the Templars Square site and specifically referenced within the draft site allocation **Policy SPS16** i.e. that affordable housing requirements will be determined through a site-specific approach. This is in line with the Viability Assessment recommendations.

[136.3 Policy H2 unsound b justified \[N.B see further comment on H2 on next pg\]](#)

It is well-documented that residential development currently faces significant delivery challenges because of reduced building efficiencies following regulatory changes, increased build costs, increasing developer contributions, falling capital values in real terms, and complex infrastructure requirements to transform large-scale brownfield sites.

Templars Square is not immune to these realities and the likelihood of a scheme at the site meeting the affordable housing policy requirements, as drafted, is limited. Given the Viability Assessment evidence base document refers to a 40% target due to the significant variations on a site-by-site basis (rather than minimum 40% as draft **Policy H2** does), we consider that draft Policy H2 is not adequately "**justified**". Furthermore, in order for the site allocation **Policy SPS16** to be "**justified**", "**effective**" and in line with emerging national policy **PM12**, the Templars Square site allocation **Policy SPS16** should reference that affordable housing requirements will be determined through a site-specific approach.

Draft **Policy S3** (Infrastructure Delivery in New Development) and draft **Policy S4** (Plan Viability) are also critical policies to ensure that policies contained within the Plan are deliverable and underpinned by sound evidence.

[136.4 Policy S3 Unsound b justified](#)

In relation to draft **Policy S3**, according to the draft 2045 Policies Map and Proposed Submission Version Draft **Policy CBLAOF** (Cowley Branch Line Area of Focus), Templars Square is outside of the Area of Focus. However, draft **Policy CBLAOF** (Part o) states that financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations towards achieving public transport enhancements will be expected. It refers to Figures 8.5 and

8.6, however these do not appear to be included in the Proposed Submission Version of the document. It is requested that these are included for clarity.

Being outside the Cowley Branch Line (CBL) Area of Focus, financial contributions associated with the delivery of the CBL should not be sought by the Templars Square site. We request clarification on this, given the impact such an approach would have on deliverability. Any contributions towards the CBL should be delivered through the Community Infrastructure Levy. We therefore consider that draft **Policy S3** and the expectation is not “**justified**” and we question whether it is in line with the Reg.122 CIL tests, specifically whether this is “directly related to the development”.

Draft **Policy S4** (Plan Viability) states that the emerging policies have been viability tested and planning applications that fully comply with them will generally be assumed to be viable. It further states that if the combined impact of the policies in the Plan result in a site being unable to deliver a viable development, and if the applicant can demonstrate particular circumstances that justify the need for a viability assessment, negotiations will take place on an ‘open book’ basis, and work through the ‘housing viability cascade’. As noted in relation to draft **Policy S2**, we consider that draft **Policy H2** is not currently “**justified**”, given the Viability Evidence base refers to a target of 40%, whereas draft **Policy H2** refers to a ‘minimum’, and does not acknowledge the site-specificity highlighted in the evidence base document.

Further to the above, in the context draft NPPF Policy DM5, there is a need for Templars Square to be clearly described as an example of where site-specific viability assessment, at application stage, will be required to ensure the plan is “**effective**” in enabling complex redevelopment sites such as Templars Square to be deliverable.

It is important for OCC to recognise all of the combined policies that would apply to landowners / developers such as ORVIL who are seeking to bring forward major and large scale residential led regeneration proposals to the City. When all draft policies are combined, it makes for a highly challenged position to enable deliverable development to come forward. Whilst the NPPF seeks for Plans to be aspirational, it also seeks for them to be prepared positively, in a way that they are deliverable. It is considered that this balance has not yet been struck when considering the draft Plan as a whole. This is apparent when reviewed against further commentary and requests for amendments, as set out in these representations.

Mix of Uses

To remove ambiguity, we are of the view that the site allocation should recognise that comprehensive redevelopment will result in reduction of retail floor space, and residential will be the primary use. As recognised in the accompanying Site Capacity Assessment, some of the existing retail units are vacant. This vacancy reflects the changing consumer habits since Covid-19, which alongside urgent housing need, no longer allows retail uses to take precedence in District Centre locations. Their vitality now depends on a suitable blend of uses to ensure vibrancy.

The draft site allocation seeks “*residential development and town centre uses that provide active frontages at ground floor level*”. This could be understood as site-specific recognition that the residential frontage can also be “active” (i.e. entrance lobbies are active compared to plant/refuse stores). If this is not the case, this should be clarified.

136.5 Policy C2 unsound c. effective

The above would be helpful to apply in the context of draft **Policy C2** (Maintaining Vibrant Centres), which indicates the typical standard threshold for ground floor Use Class E Active Frontages is 80% within Cowley Centre. We consider any prescribed threshold such as this to be unrealistic (and therefore not “**effective**” in planning policy) for residential-led mixed use development such as Templars Square, where the ground floor will also need to serve significant residential development on upper floors. Instead the approach should be design-led, as well as recognising that residential ground floor entrances are ‘active’. The priority should be focused on maximising active frontages to create a vibrant place through positive place making and not by prescriptive targets, which may have other unintended design consequences.

The 2045 policies map suggests that existing internal areas of the shopping centre are ‘District Centre Active Frontage’. An active frontage is an outward and public street-facing unit/frontage. In order for the supporting Policies Proposals map to more appropriately represent active frontage at Templars Square, this should be aligned with outward facing active units only. CBRE and ORVIL can assist with the process of defining the existing active street facing frontages, so the existing active frontage is accurately reflected in the Policies Map.

Given the scale of the site, its ambitions and associated complexities, **Policy SPS16** and its supporting text should acknowledge and provide flexibility that any redevelopment scheme at the site can be delivered in phases. Linked to this should be an acknowledgement of deliverability considerations which require a phased approach to be taken.

Height and Scale

Draft **Policy HD2** (Making Efficient use of Land) states the following: “*Planning permission will only be granted where development proposals make efficient use of land and maximise capacity. It is expected that sites across the city will be capable of accommodating development at an increased scale and density to their surroundings*”.

The draft policy states that “very high-density” residential development will indicatively be taken as over 100dph. We acknowledge the reference to ‘over’ 100dph is a starting point not maximum which is positive in the context of housing need and limited land availability.

The draft site allocation acknowledges that there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). We support the approach of determining acceptable heights within the site allocation via a visual impact assessment (with reference to Draft **Policy HD3** and draft **Policy HD6**).

The OCC High Buildings TAN identifies the site as one of the ‘Areas of Greater Potential’ within Figure 7 ([Area 5A – Cowley Residential Suburb](#)). It is recognised that the Templars Square site represents an important opportunity to deliver a high density residential led scheme of scale at the site.

There does not appear to be a more recent high/tall buildings study as part of the emerging Local Plan evidence base. However, as referred to in the draft Local Plan 2045 Background paper 011 (Urban Design, Placemaking, Heritage and Archaeology), the Cowley Branchline Densification Study (LDA 2025), when published, will provide guidance for growth in the vicinity of the site, aiming to limit sprawl and inefficient use of land.

The Site Capacity Assessment acknowledges that existing heights on the site reach up to 10 storeys at Hockmore Tower, and the previous planning permission included a 14-storey building along the frontage of the site, on Between Towns Road.

In any future planning application, a ‘design-led’ approach to density will be taken, based on the opportunities and constraints of the site and assessment of impacts. It is considered that this is the only approach that is capable of delivering the intention of the policy to ‘*make efficient use of land and maximise capacity*’ and align with the substantial weight and described within the draft NPPF.

Environment 136.6 Policy G2 unsound b. justified

Draft **Policy G2** (Enhancement and provision of new Green and Blue features) states that for residential sites of 1.5 hectares and above, new public open space of 10% of the area covered by residential development is required. It states that for mixed-use sites, the area of residential use should be used for that calculation.

At Regulation 18 stage, we requested further clarification on this policy requirement, and whether this new space should comprise hard or soft landscaping. We also requested clarification on how to calculate the 10% in the case of buildings with non-residential ground floor active uses with residential above.

This policy has not been updated in the Proposed Submission Version, and we note that it does not currently include any flexibility for sites that are unlikely to be able to meet this requirement or are already well-served by surrounding

public open space. We therefore consider this policy requirement needs to be reviewed and better “justified” on a site-specific basis.

136.7 Policy G3 unsound b. justified

Draft **Policy G3** states that major development proposals should demonstrate that there would be no reduction in baseline score and achieve a minimum score of 0.3 for residential or predominantly residential schemes. At Regulation 18 stage, we requested that the policy wording was adjusted to make clear that this is a target rather than minimum, however no change has been made to draft **Policy G3**.

The Proposed Submission Version draft **Policy SPS16** is helpfully specific in the case of Templars Square, stating that “the site is likely to score below the Plan’s Urban Greening Factor target”. However, the site allocation later states that greening features will be necessary “to meet the required urban greening factor score”, which reads to conflict and should be clarified/corrected through modification.

Summary

The new Oxford Local Plan 2045 will establish a planning policy framework in which a future development proposal at Templars Square will be assessed.

These representations have set out the strategic significance of this site for Oxford. This site represents a unique brownfield redevelopment opportunity for the city, in an accessible and sustainable location. It is imperative that the new Local Plan takes a site-specific approach that enables the site to reach its full redevelopment potential by setting realistic, deliverable targets on matters including land uses, affordable housing and density.

These representations emphasise that any redevelopment on site should be ambitious in scale and residential led; on the basis that Oxford City cannot meet its housing target within the confines of the city, and within the context of the draft NPPF’s substantial weight applied to residential development on brownfield land.

As noted within these representations, there are critical aspects within various draft emerging policies that are not considered to be positively prepared, effective or justified based on the evidence base. Whilst there are many aspects that we are supportive of, we consider further modification is required to ensure the plan is capable of being found sound.

We would very much welcome the opportunity to work with you and enter into a Statement of Common Ground and support modifications, to ensure the 2045 Local Plan is a positive policy document which will enable the full potential of the Templars Square site to be achieved.

Yours sincerely,



Olivia Russell

