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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: John Rhodes

Organisation (if applicable): Quod

Address: [redacted]

Email:

Date: 3/3/26

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.

	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.

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	Sp18	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 see our attached representations

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.

Pleae see our attached representations

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

WARNEFORD PARK – REPRESENTATIONS TO REGULATION 19 POLICY SP18

These representations are submitted on behalf of Oxford Health NHS Foundation Trust and the University of Oxford (the Warneford Park partners). The Oxford Health NHS Foundation Trust is the applicant for the Warneford Park development.

The Warneford Park masterplan aims to transform the historic Warneford Hospital and its grounds into a distinctive modern campus that combines within its heritage and landscaped setting:

• a major new mental health hospital

• a multi-disciplinary academic research centre focused on brain health,

• a large-scale centre for biotechs, start-ups and pharma companies to develop fundamental research through clinical trials into new treatments, and

• Oxford University's first college in Headington

These individual elements are designed to work together symbiotically, so that the output of the campus steadily becomes greater over time than the sum of its parts. The goal is to deliver world-class patient care alongside new research insights into some of the 21st Century's most prevalent and intractable illnesses that are then developed efficiently into new treatments, all the while educating future generations of clinicians and medical scientists in an elegant and stimulating environment.

Warnford Park is identified in the Interim report of the Oxford Growth Commission in the following terms:

"*In the Oxford East Opportunity Area, besides the close to consented housing scheme at Bayswater Brook, the key opportunity is the plan for Warneford Park, a new centre for Mental Health and Brain Sciences to complement the existing concentration of NHS facilities and world leading medical research*. *This scheme, for which a planning application was submitted to Oxford City in 2025, will provide a new, fit-for-purpose mental health hospital surrounded by a research and innovation hub. This will have a positive impact on patient care not just in Oxfordshire but across the NHS*."

Background

The Trust and its partners (the Warnford Park partners) have been working together and working closely with Oxford City Council since 2019 in order to prepare and propose a masterplan for the comprehensive development of the Warneford Hospital site. The current Warneford Hospital is the oldest serving hospital in the NHS estate and is no longer fit for purpose.

A PPA was entered into in July 2024 and, following an extensive pre-application engagement, a hybrid planning and listed building consent applications were submitted in July 2025 for the:

"(i) Outline application (with all matters reserved save for "access"), for the demolition of existing buildings and erection of a graduate college for the University of Oxford comprising Student accommodation (Sui Generis), ancillary college buildings (Sui Generis), provision of landscaping, bin and cycle parking, car parking, public realm and open space. (ii) Full application for demolition of existing buildings and partial demolition of existing walls, erection of a hospital building (Use Class C2), a research building (Use Class E(g)(ii)), a hospital research link building (C2/E(g)(ii)), and erection of relocated SANE building (Use Class E(g)(i)and (ii)) and pavilion building. Provision of associated car parking, cycle parking, bin storage, access, landscaping, public realm works and associated infrastructure works. Refurbishment and repair of the Gate Lodge and use for residential accommodation associated with the College (Use Class Sui generis)"

and

"Interventions including alteration, demolition and repair of listed and curtilage listed structures to facilitate comprehensive development of the site. The works relate to the demolition of the former farmhouse and former stables; dismantling of former pavilion building and onsite reconstruction and relocation; removal of secondary attached and freestanding structures; alterations and repair of historic boundary walls; and repair and restoration of the Gate Lodge."

A feature of the pre-application engagement was design review. The emerging proposals were the subject of 4 presentations to the expert Oxford Design Review Panel, resulting in agreed principles for the application proposals.

That process was governed and informed by the terms of a site specific policy – the adopted Local Plan Policy SP22, which sets out clear support for the principle of the development whilst identifying the important considerations which must be taken into account in any application. The terms of that Policy, which were modified and settled through the previous local plan examination, have proven to be a useful framework for the preparation and consideration of the application.

Concerns for soundness

Against that background, the Trust and its partners do not welcome the wholesale recasting of the Warneford Hospital site specific policy. Such recasting is unnecessary and potentially destabilising in the context of the current application and its subsequent implementation through further applications. The Warneford Park partners have never

understood why the policy needs to be recast and have several times made that position clear to the Council.

Rather than being positively prepared, it is a feature of the emerging draft Local Plan that its policies are heavily constraints based. In the case of Warneford, the new draft leads with constraints, and unlike the existing policy SP22, it does not explain or recognise that the existing hospital buildings are "*in need of major refurbishment or redevelopment to comply with modern NHS standards*". Little positivity is expressed in terms of either the need for the development or the exceptional benefits which it will bring. Apart from listing uses which may be permitted on the site, no sense is conveyed that this is a positive allocation of the Plan, rather it sets out a schedule of obstacles to be overcome.

Comments are made further below on the specific terms of the policy but the partners' first submission is that there has been no need to change the existing site policy SP22 and that, in any event the approach and the wording of the existing policy SP22 is to be preferred. These comments are specific to the Warneford site policy but the concerns relating to Warneford are concerns with an approach to policy that is a characteristic of the Regulation 19 plan. This is concerning given the exceptional need for development in the City and the need to make positive, best use of limited available land.

The overall approach to site allocations in general and Warneford Hospital in particular is not justified and risks not being effective in achieving the stated aims of the Plan. The approach fails the NPPF requirement for plans to be positively prepared.

The policy also descends to a level of detail which is both selective and unnecessary. In that context, the Plan is not proportionate.

Judged against the requirements of NPPF paragraphs 15 and 16, the Regulation 19 Plan:

- is not succinct
- is not positively prepared
- has not been shaped by effective engagement with stakeholders; and
- does not avoid unnecessary duplication of policies.

More detailed comments on draft SP18

The policy does not start with a clear explanation of its purpose or of the important background to the site. It should be apparent on the face of the policy that the existing hospital and its outbuildings are in urgent need of refurbishment or redevelopment, that a new hospital is needed and that the comprehensive development of the site can achieve major benefits, which are directly consistent with the stated objectives of the Plan.

In the list of uses that may be appropriate, "hospital" has been dropped from the list that is currently set out in the existing local plan policy SP22.

These important omissions should be rectified, both to facilitate planning applications made to address the urgent need and for the benefit of the public's understanding of the Plan.

Mark ups of the draft policy can be provided to provide a word by word commentary on the text but the Warneford Park partners' principal submission is that the existing text in the adopted plan is to be preferred.

Without entering into a word by word commentary here, however, the partners' detailed concerns can be summarised under four short headings.

Length and detail

The new draft policy SP18 is 1,057 words compared with the combined total of 535 words in the existing Plan for the policy and the supporting text of SP22. The Plan is not succinct and the approach is not proportionate. The Government's intention for Local Plans is that they should be shorter and that they should contain only "*concise explanatory text.*"[1]

There is no need for three times more text to set out and explain what is essentially the same allocation as that set out in the adopted plan. The approach is wrong in principle.

It is also wrong in practice, because the level of detail provided extends to a partial but detailed site brief. The detail of many matters which are better addressed through the development management process are set out, rather than the policy following the lead of SP22 to set out at a high level the important matters that must be taken into account.

There are many examples but, for example, the draft policy SP18 provides;

Planning permission will only be granted if it can be demonstrated that there would be no adverse impact upon the Lye Valley SSSI (Policy G6), including through impacts on surface or groundwater flows and quality, as well as groundwater recharge. Proposals should be designed to satisfy the applicable tests identified for the relevant impact risk zones set out in the Lye Valley Hydrogeological Impact Assessment report and accompanying Technical Advice Note, this may require additional supporting evidence in the form of a drainage strategy.

The text can and should stop after the first sentence, which sets out the important test for development. It is not necessary or appropriate for the Local Plan to then set out or speculate in policy what work is necessary to meet the test. This approach is characteristic of the draft policy as a whole.

[1] Draft NPPF 2025 PM2.2.

Repetition

It is not necessary for the site allocation policy to repeat or summarise the requirements of other local plan polices that will apply to this site. Multiple policies are listed in draft SP18 and partially explained. This creates not only excessive and unnecessary length in the policy but risks those policies being distorted or wrongly understood.

Each specialist policy – such as the policy for trees or the policy for peat, are set out in their full wording and context elsewhere in the Plan and they will apply to any development here or elsewhere whether listed in each site allocation policy or not.

What becomes particularly dangerous is a partial summary or reinvention of those policies. For example, the text for SP18 states:

"*Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees (some of which are protected with TPOs*"

That is not a proper summary of the Plan policies for trees, which are more nuanced. Where the balance required by those polices is struck, SP18 must not create additional or different policy tests for the approach to trees. That is particularly relevant in this case where the current application proposals seek to restore the historic landscape of Warneford (which was modelled on Versailles), which may involve the removal of some non-original trees, whilst compensating for that loss by ensuring the enhancement of the overall tree canopy. These detailed matters are best addressed with the benefit of a masterplan, design review and a planning application against the full text of all relevant policies.

If reference to other policies is necessary, a model approach is the current adopted policy, which simply states, for example, "*development should demonstrate compliance with Policy DH3*"

Negative approach

The draft SP18 is negatively expressed and heavily constraints based.

Apart from the excessive length of the reported constraints, examples include:

"Proposals should seek to retain existing features where possible"

"Losses of open space identified as supporting green infrastructure (Policy G1) will also need to be mitigated through enhancement of remaining GI."

"New buildings should therefore be of an appropriate height, scale and massing that responds to this wider context, with plots being arranged in a way that seeks to avoid further loss of the open character of the site such as by incorporating green gaps between them"

By contrast, the existing Policy SP22 recognises the need for planned change, including the need to construct a new hospital on the site of the former playing field. That inevitably results in a loss of open character compared with today but it is consistent with rather than contrary to policy.

The site is not currently designated as Supporting Green Infrastructure and that proposed designation should be removed from the site allocation. It is critically important that best use is made of Oxford's limited opportunity sites and this site in particular has the potential to support nationally important mental health facilities because of its unique location and history. Comprehensive redevelopment is necessary whilst retaining, respecting and finding a new long term use for its important heritage assets. That objective should not be undermined by additional and unnecessary policy wording that presumes in favour of the retention of the site's existing condition.

Lack of positive guidance

The current adopted Local Plan policy SP22 provides:

"*Because of the character of the historic buildings and parkland and the semi-rural setting, development of 3-4 storeys is likely to be appropriate, subject to careful massing . Lower buildings heights to transition with the meadow to the south would help to retain the tranquil feel of the orchard and meadow*."

Those words do not appear in the equivalent Regulation 19 draft policy SP18. Instead, it provides the following less useful text, which states that the site:

"*has some sensitivity in terms of impact of new development on the surrounding area. New buildings should therefore be of an appropriate height, scale and massing that responds to this wider context*,"

The reference in current policy to development of up to 3- 4 storeys has proven to be not only correct (and supported by the design review process), it has also assisted in the public understanding that this site is suitable for buildings of some scale. Again, the Regulation 19 wording is neither helpful nor positively worded.