

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to
fill Part A in once

Your name:	Chris Pattison (on behalf of University of Oxford and Oxford Brookes University)		
Organisation (if applicable):	Bidwells LLP		
Address:			
Email:			
Date:	17/03/2026		

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

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 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 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

Your ref: Oxford Local Plan 2045 (Reg 19) Consultation
Our ref: JB72839 / JB75357
DD: [REDACTED]
E: [REDACTED]
Date: 13/03/2026 v1

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

Dear Sir/Madam,

OXFORD LOCAL PLAN 2045 (REGULATION 19) CONSULTATION RESPONSE ON BEHALF OF THE UNIVERSITY OF OXFORD AND OXFORD BROOKES UNIVERSITY.

I write on behalf of The University of Oxford and Oxford Brookes University ('the Universities') in response to the Oxford Local Plan 2045 Submission Version (Regulation 19) consultation.

As set out during previous rounds of plan-making, the Universities and the City Region are inextricably linked. The built environment, cultural life and economic output of Oxfordshire are all linked to the presence of nationally and internationally regarded leaders in teaching, research and innovation.

It follows that the Universities remain keen to continue working with Oxford City Council to ensure that the policies contained within the future Oxford Local Plan 2045 enable the Universities to continue investing in their academic, research and residential estate and to support the City's role in developing the UK as a global leader in innovation.

On this basis, the Universities wish to make comment on the following draft policies:

- **Policy H3:** Affordable Housing Contributions from new purpose-built student accommodation
- **Policy H8:** Location of New Student Accommodation
- **Policy R1:** Net Zero Buildings in Operation
- **Policy R2:** Embodied Carbon
- **Policy HD6:** Views and Building Heights

105.1 H3 UNSOUND b.justified
Policy H3: Affordable Housing Contributions from Other Development Types

In the Regulation 19 Plan, former draft Policies H3–H5 have been consolidated into a single Policy H3, now addressing "Affordable housing contributions from other development types." This revised policy captures contributions from new purpose-built student accommodation, new older people's accommodation, and new employment-generating development.



[REDACTED]
[REDACTED] W: [bidwells.co.uk](https://www.bidwells.co.uk)

As set out in our previous Regulation 18 representations, the Universities do not support the inclusion of purpose-built student accommodation within this policy. Purpose-built student accommodation already functions as an affordable form of housing relative to the open market and plays a crucial role in reducing pressure on the wider housing stock.

In addition, the number of sites suitable for new student accommodation is inherently limited. Opportunities for speculative privately-led student schemes have notably declined in recent years, reflecting both land supply constraints and the increasingly stringent location controls in Draft Policy H8. We expect this trend to continue, and the restricted pipeline raises questions about whether the proposed contributions policy is proportionate or justified.

By attempting to align the affordable housing expectations for brownfield commercial-to-residential schemes with those for brownfield student accommodation schemes, the policy risks making new student developments financially unviable. Inevitably, any additional financial burden would translate into higher rents for students, undermining affordability and potentially reducing the availability of purpose-built stock.

The City Council has not, to our knowledge, published any assessment of the policy's likely impacts on student accommodation rents or the future demand and supply balance for purpose-built student housing.

A detailed impact analysis is therefore required to demonstrate that the policy is deliverable, justified, and aligned with the Council's wider objectives for affordability and housing choice.

Policy H8: Location of New Student Accommodation 105.2 H8 UNSOUND b.justified, d.consistent

Draft Policy H8 states that planning permission will only be granted for student accommodation on or adjacent to an existing university or college campus or academic site, or hospital and research site, in the city centre or a district centre; or on a site which is allocated in the development plan to potentially include student accommodation. The Universities consider this list to be restrictive to both Universities and the delivery of student accommodation by third party providers, given its interaction with Policy H9. Without the allocation of new sites, there needs to be greater flexibility on windfall locations to help both Universities meet the requirements of the threshold in Policy H9. It should also be noted that the provision of purpose-built-student accommodation ('PBSA') positively impacts on the wider housing availability in the City by providing more accommodation at a higher density, thereby releasing housing stock back to the community.

suggested changes

On this basis, the Universities wish to expand the list of suitable locations for student accommodation to include 'along arterial routes' and 'sites within a 15-minute walking distance of a campus/college'. It is considered that the arterial routes in/out of Oxford (Banbury Road, Iffley Road, Botley Road, St Clement's Street, Headington Road, Cowley Road, Iffley Road, Abingdon Road, Woodstock Road) present a logical and suitable option for locating new student accommodation given the frequency of public transport services along these routes and ease of access to/from both educational and social facilities and the reduced sensitivity of the residential environment.

The draft National Planning Policy Framework (December 2025) is also relevant. Policy HO9 introduces a new location test for Purpose-Built Student Accommodation, focusing on whether residents can access their educational facilities by "walking, wheeling or public transport." This indicates that a site served by a sustainable transport corridor can be acceptable in principle, rather than being assessed solely on its immediate adjacency to the institution. We would encourage Oxford City Council to adopt a similar approach.

Finally, it is understood that the intent of this element of the policy is to ensure the student accommodation does not result in unacceptable changes in character nor generate increases in activity along residential streets. However, there are other policies within the Plan which already provide this function, namely Draft Policy S2 (High Quality Design) for ensuring development does not result in unacceptable changes in character and Draft Policy R8 (Amenity Impacts of Development) for ensuring development does not lead to adverse amenity impacts. Furthermore, with the exception of students with accessibility requirements, it would be reasonable to expect all students residing along the aforementioned arterial routes to travel via sustainable modes of travel on a day-to-day basis, and that PBSA along these routes could be car-free accordingly.

Policy R1: Net Zero Buildings in Operation 105.3 R1 UNSOUND b.justified

Draft Policy R1 seeks to prioritise onsite energy production in the first instance before seeking to meet any remaining energy balance through renewable sources at a location offsite. We continue to encourage further consideration of this requirement, firstly given the inefficiencies associated to delivering all energy needs on site which inevitably means designing a system for meeting peak demand, and secondly given off-site renewable generation is dependent on adequate capacity in local infrastructure, which is a major local constraint owing to the shortage of capacity within the electric grid in Oxford.

As a last resort the policy outlines that *'offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location'*, however, there is no evidence presented to define what the applicable charge would be and the implications on viability of schemes. The Universities maintain that further detail is required before they can consider this policy further.

Policy R2: Embodied Carbon 105.4 R2 UNSOUND b.justified

Draft Policy R2 requires the applicant to demonstrate that *Free-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition'*.

The Universities maintained position on this policy is set out in the following three key points:

- 1) The policy does not recognise that the long-term benefits of developing a more sustainable building may outweigh the initial release of carbon emissions that come from demolishing a building. It is anticipated that there will be instances where it is more beneficial in the long-run to demolish a building even where it would have been possible to maintain it. Inadvertently, the policy risks adversely impacting the Universities' ability to drive innovation in the very fields of research which enhance our understanding of the climate crisis or support the move to a net zero economy and low-carbon world. Furthermore, planning policy at a national level does not strictly prohibit demolition, nor does it suggest that carbon saving policies should be prioritised over the growth of the economy and innovation, as does the current Draft Policy.
- 2) It is unclear what constitutes 'robustly demonstrated to be unfeasible'. It is considered that this is a potentially open-ended policy test which leaves the final assessment down to the judgement of the decision-maker at the end of the process, and lowers confidence in the planning application process. It is considered that greater clarity is required.
- 3) The policy introduces the need for complex Energy and Carbon Statements including Whole Life Carbon Assessments that measure embodied carbon throughout the construction process including upfront carbon, as well as quantitative measures for reducing embodied carbon. It

would be helpful if the City Council could reflect on the additional number of reports that this draft Local Plan would seek in support of planning applications and compare this against existing local and national validation requirements. The Universities support the Government's wider ambition to streamline the planning system and additional requests for information through local policy should be examined carefully.

Further, the Universities would like to draw attention to the viability impacts of Policy R1 and R2 in combination. The associated Viability Appraisal estimates that the reduction in residual land values is typically 8% for operational Net Zero Carbon, whilst achieving both embodied and operational Net Zero Carbon would reduce residual land values by approximately 23–43%. These figures represent a substantial viability burden, especially for high-performance academic and research facilities, which typically face higher construction costs and tighter operational performance specifications.

Policy HD6: Views and Building Heights 105.5 HD6 UNSOUND d.consistent

Draft Policy HD6 states that 'Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view'. Under the terms of the policy, all levels of harm are unacceptable, regardless of the level of harm and the extent of any benefits which may outweigh that harm. This is inconsistent with national planning policy, in that it does not enable a balancing exercise to be undertaken. The Universities would therefore ask the Policy to be rebalanced.

Site Allocations / Areas of Focus

Marston Road and Old Road Area of Focus 105.6 MRORAOF UNSOUND b.justified

Whilst Oxford Brookes University is supportive of the Marston Road and Old Road Areas of Focus in principle, Oxford Brookes consider that the policy should be amended to more clearly reflect the emphasis on densification and the more efficient use of land highlighted in the supporting text. In particular, the policy should acknowledge the opportunities identified within the Area of Focus to make more efficient use of land.

1 Pullens Lane 105.7 Omissions site UNSOUND b.justified - enter under c8.

It is noted that this allocation has been removed from the draft Local Plan, with the Sustainability Appraisal suggesting that, as the site is unlikely to yield more than 10 residential units, it should instead be treated as windfall. However, this reasoning does not reflect the site's strategic value for institutional development. Oxford Brookes University considers that the site remains an important opportunity to support the growth of academic and associated uses in this part of the city. Oxford Brookes University therefore requests that the site is allocated specifically for academic use (Class F), with sufficient flexibility to accommodate ancillary visitor accommodation for visiting lecturers and staff. Such an allocation would provide clarity and certainty for long term planning, ensure that the site contributes positively to meeting identified needs for educational space, and align with the wider objectives for more efficient use of land within the surrounding Area of Focus.

Finally, in addition to the preceding comments, we wish to submit the amendments outlined in **Appendix 1** relating to the following policies:

[Under site reps add note to refer to Appendix 1 in original submission for details of changes](#)

University Of Oxford

- SPE1: Churchill Hospital 105.8 SPE1 UNSOUND b.justified

- SPE5: John Radcliffe Hospital [105.9 SPE5 UNSOUND b.justified](#)
- SPCW1: Banbury Road University Sites – Parcel B [105.10 SPCW1 UNSOUND b.justified](#)
- SPCW8: Osney Mead [105.11 SPCW8 UNSOUND b.justified](#)
- SPCW12: West Wellington Square [105.12 SPCW12 UNSOUND b.justified](#)
- SPN1: Diamond Place and Ewert House [105.13 SPN1 UNSOUND b.justified](#)
- SPN4: Oxford University Press Sports Ground [105.14 SPN4 UNSOUND b.jusitified](#)

Oxford Brookes University

- SPS5: Crescent Hall [105.15 SPS5 UNSOUND b.justified](#)
- SPE11: Oxford Brookes Marston Road Campus [105.16 SPE11 UNSOUND b.justified](#)

The University of Oxford and Oxford Brookes University welcome the opportunity to contribute to the Regulation 19 consultation and remains committed to working constructively with the City Council to ensure that the Local Plan supports the long-term success, sustainability, and community benefit of Oxford.

Yours faithfully,

Chris Pattison
Head of Oxford

APPENDIX 1

SPE1: Churchill Hospital

Planning permission will be granted for:

- a) further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the Churchill Hospital Site
- b) other suitable uses which must have an operational and/or research link to ~~the~~ hospital healthcare and education could include:
 - employment;
 - patient hotel;
 - primary healthcare;
 - education;
 - academic institutional and research;
 - extra care accommodation, including elderly persons accommodation;
 - small scale retail units, provided that they are ancillary to the hospital;
 - employer-linked affordable housing;
 - Student accommodation.

Other complementary uses will be considered on their merits.

Development of the site should be undertaken as part of a masterplan to ensure all land use issues including parking are considered in a comprehensive way to make the most efficient use of land.

Open space, nature, flood risk

- a) While there are no designated ecological features on the site itself, the site directly adjoins a number of designated ecological sites and parts of the GI network. There are also significant existing trees scattered within the site and near to the western boundary growing along Boundary Brook which are important to public amenity in the area and will provide valuable ecosystem services. Therefore, retention and enhancement of the supporting green infrastructure will be required (Policies G1, G2, G3). This enhancement could be achieved by increasing both the amount, and diversity of, landscaping and ensuring that development considers how different parts of the site may hold opportunities for ecological connectivity in the wider landscape. Opportunities should be sought to repurpose the existing hard surfaces for other uses including GI and amenity uses, or to create connections between the site and landscape beyond, or green corridors/routes through the site.
- b) Small strips along southeast/southwest boundaries of the site are identified within the Local Nature Recovery Strategy is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.
- c) As the site is located within identified impact risk zones for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. 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 and/or hydrogeological impact assessment.

- d) A buffer zone should be provided during the construction period to avoid disturbance to the adjacent SSSI and additional protective and enhancement measures for river and wetland restoration as required around the watercourse and ecological buffers zones (minimum 10metres from bank top) should form part of development proposals.
- e) Any planning applications near the Boundary Brook or Lye Valley will also need to assess the potential for additional indirect impacts on the flora and fauna of those areas, including (but not limited to) potential impacts from lighting, noise, and dust, and provide adequate buffers and deliver ecological enhancements as required.
- f) Due to the site's proximity to recorded peat reserves associated with the Lye Valley, and the potential for further deposits in the area, any development on currently undeveloped parts of the site will only be permitted where it can be demonstrated that there will be no harm or loss of these deposits (Policy R6). Where there is the potential for harm to peat reserves, site layout should be designed accordingly to protect and mitigate any harm to identified peat deposits on the site.

Urban design & heritage

- g) The central part of the site comprises the historical temporary hospital buildings used during the Second World War, which are non-designated heritage assets. Proposals should seek to deliver enhancement of these assets and their settings. This should be achieved by ensuring architectural design takes inspiration from, and respects the context of, the existing non-designated heritage assets (Policy HD4).
- h) A masterplan-led approach should be used to ensure that buildings and parking are rationalised with consideration given to the location of various uses to improve legibility of the site. Proposals should be designed to create active frontages and greater permeability through and into/ out of the site.
- i) Materials and design quality should be improved as poor-quality buildings are replaced. This could be achieved by drawing inspiration from the non- designated heritage assets to inspire and enrich the identity, character and quality of new development on the site.
- j) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5).

Movement & access

- k) The site is car dominated with large areas utilised for surface level car parking. Development proposals should demonstrate rationalisation of the existing parking on the site to ensure the most efficient use of land is made.
- l) Mitigation measures will be required to ensure that proposals do not lead to increased parking pressure on nearby residential streets.
- m) Improvements to public transport, walking, cycling and wheeling access through the site will be required. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan.
- n) Development proposals shall not prejudice bus access through the site, and new routes that effectively separate walking, cycling and wheeling from visitor or servicing traffic, will be encouraged. Additional access points to non-vehicular traffic onto the site will also be beneficial.

Additional Requirements

- o) As the site has a long-standing hospital use, with potential for some areas of land contamination from historic use, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (Policy R7).

SPE5: John Radcliffe Hospital

Planning permission will be granted for:

- a) further hospital related uses, including the redevelopment of existing buildings to provide improved facilities on the John Radcliffe Hospital Site; and/or:
- b) Other suitable uses which must have an operational link to ~~the hospital~~ healthcare and education and are:
 - Employment uses;
 - Patient hotel;
 - Extra care accommodation, including elderly persons accommodation;
 - Primary health care;
 - Education;
 - Academic institutional;
 - Small scale retail units ancillary to the hospital;
 - Employer-linked affordable housing;
 - Student accommodation.

Other complementary uses will be considered on their merits.

Development of the site should be undertaken as part of a masterplan to ensure all land use issues including parking are considered in a comprehensive way to make the most efficient use of land.

Open space, nature, flood risk

- a) Development proposals must ensure that existing green infrastructure features on the site are protected and opportunities sought to enhance these. An Urban Greening Factor assessment will need to be produced and submitted. Planning permission will only be granted if an appropriate proportion of green features are incorporated into the design of development to meet the minimum targets (Policies G1, G2 and G3).
- b) Existing onsite biodiversity should be retained, enhanced and integrated into development proposals (Policies G2 and G4).
- c) Existing drainage features such as the brook separating northern car parks should be maintained, enhanced and integrated into the landscape scheme, potentially creating wildlife corridors through the site (Policy G8).
- d) This site is within an area where development could exacerbate surface and/or foul water flooding. There is an opportunity to address excess of runoff at the John Radcliffe Hospital site by ensuring that any development at the site reduces rather than maintains existing levels. This could take the form of ponds, wetlands or an on-site attenuation feature. A drainage strategy will also need to be produced by the developer in liaison with the City Council, Thames Water and the Environment Agency, to establish the appropriate drainage mitigation measures for any development. Planning permission will only be granted if sufficient drainage mitigation measures are incorporated into the design of proposals (Policy G7).
- e) As the southern part of the site is located within an identified impact risk zone for the Lye Valley SSSI, new development could have impacts on the functioning of this sensitive ecological site, particularly where it causes changes in surface water or groundwater conditions. 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.

Urban design & heritage

- a) Development proposals must be designed with consideration of their impact on the Old Headington Conservation Area and views, particularly from the Boars Hill and Elsfield view cones, as well as on the listed buildings (Policies HD3 and HD6).
- b) For development of new hospital buildings, materials should be consistent with townscape character and be modern in style and materials. Whilst a more contextual approach should be considered for development of residential, student residential or employer linked housing which would soften the impact of any new development and take inspiration from neighbouring areas. Material choice should not exacerbate the prominence of the hospital in views across the city or the view cones.
- c) Proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5).

Movement & access

- i) Development proposals should demonstrate rationalisation of the existing parking on the site to ensure the most efficient use of land is made.
- j) Improvements to public transport, walking, cycling and wheeling access through the site will be required. These measures should be set out within a transport assessment and travel plan and reflected in an agreed masterplan. Development proposals must not prejudice bus access through the site, and new routes that effectively separate walking, cycling and wheeling from visitor or servicing traffic, will be encouraged. Additional access points to non-vehicular traffic onto the site will also be beneficial.

Additional Requirements

- k) As the site has a long-standing hospital use, with potential for some areas of land contamination, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (Policy R7).

SPCW1: Banbury Road University Sites – Parcel B

Planning permission will be granted for academic institutional uses, student accommodation, and/or residential development. The **minimum** number of dwellings **expected to be delivered** is **around** 54 (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (Policy G6).
- b) Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant, through the use of appropriate measures including SuDS (Policy G6).
- c) Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant (Policy G6).
- d) Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees and boundary features that help preserve amenity.
- e) In order to retain the existing Urban Greening Factor score, any losses in green features should be compensated for either through enhancement of lower quality areas with a greater variation in planting and new habitat, such as within and around the boundaries of new gardens, as well as additional planting such as new trees that can enhance canopy cover and the setting of the listed buildings and conservation area.
- f) The potential presence of priority species/habitats on the site should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly. Proposals should also consider impacts on the surrounding areas, particularly, the nearby designated sites such as New Marston SSSI (Policy G6).

Urban design & heritage

- g) Proposals should be informed by an appropriate assessment and strategy that responds to the designated heritage assets on the site or close by. In particular, proposals should be designed in a way that preserves and enhances the significance of the listed buildings (including their setting); as well as the broader landscape including the North Oxford Victorian Suburb Conservation Area. This could be done in various ways, including selecting materials that take inspiration from within the conservation area or the existing listed buildings on and near to the site; ensuring new buildings located close to designated assets are positioned sensitively and buffered through use of green features (Policy HD3).
- h) There is also the potential presence of archaeological assets on the site including prehistoric and Roman remains. Proposals should ensure that these are appropriately investigated and responded to (Policy HD5).

Movement & access

- i) Opportunities should be taken to consolidate car parking and reduce the car dominated character within the site. Proposals that can prioritise other forms of travel, such as walking,

cycling and wheeling, will be strongly supported. This could include incorporating additional linkages through the site from north/south for walkers and wheelers.

Additional requirements

- j) Design measures may be necessary to mitigate negative amenity impacts such as those arising from noise pollutants as this site is part of an area which is subject to significant environmental noise from the traffic on Banbury Road and Winchester Road.
- k) Proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (Policy R7).

SPCW8: Osney Mead

Planning permission will be granted for a mix of uses including:

- Employment (office/ R&D/ light industrial);
- Employment (B2/ B8);
- Academic institutional uses including teaching and research;
- Residential (subject to outcome of further FRA work), including employer-linked affordable housing, and student accommodation.

The development is expected to deliver ~~a minimum of~~ around 247 dwellings (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied), unless further flood risk work undertaken cannot find a solution to ensure the safety of residents.

The development of an innovation quarter is encouraged. Other complementary uses will be considered on their merits including uses which help activate appropriate ground floor street frontages. Such uses could include culture, arts and leisure uses.

To maximise the full potential of the site, a comprehensive approach to future planning and redevelopment should be undertaken. Development proposals should be delivered in accordance with a masterplan-led approach that sets out the anticipated development phases in which the site will be brought forward. This is to ensure that site constraints, new infrastructure provision and land-use considerations (in particular) are resolved on a site-wide basis. Any development proposals coming forward should not prejudice the comprehensive redevelopment of the site. Short-term incremental opportunities for development will be assessed on their merits and will need to have regard to the delivery of any agreed wider masterplanning ambitions for the site.

Development proposals across the site should have regard to the principles set out in the West End and Osney Mead SPD. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) Development proposals should take opportunities to enhance biodiversity along the waterfront. Such measures could include bank restoration measures. A 10-metre watercourse buffer should be maintained or re-instated where possible (Policy G2).
- b) Any new open space provided should be designed to be accessible for all site users and visitors. Wider public access to on-site open space is encouraged. Any opportunities to deliver new and/ or enhance existing on-site open space that makes a positive contribution to the green infrastructure network should be taken. Given the relationship with the surrounding fields to the south, development proposals should investigate extending wildlife corridors through new green infrastructure provision on site.
- c) A site-wide landscaping and public realm strategy should be prepared for the site. Proposals for individual plots should identify how they will align with/ comply with the overall strategy. Appropriately managed on-site landscaping that supports and sustains the delivery of a network of green corridors throughout the wider site should be delivered.
- d) A site-specific Flood Risk Assessment (FRA) will be required, and a sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding, with car parks and other ancillary uses in higher risk areas where possible. The site-specific FRA should consider onsite routes and any infrastructure required to reach the access route. Areas of significant flood risk are present along the main access route to the site. Given there is no advance flood warning provision for the site,

the potential for evacuation before a more extreme fluvial or pluvial flood, considering the effects of climate change for the lifetime of the development, needs to be considered by an FRA, with advice sought from the emergency services and the local authority's emergency planner. Early flood warning will be vital to ensure the access route can be utilised before it is inundated by floodwaters. (Policy G7).

- e) The drainage strategy should be designed to manage runoff arising from the development and ensure surface water flood risk on and off the site is not increased, noting that potential for infiltration SuDS is likely to be quite limited (Policy G8).
- f) Part of the site is identified within the Local Nature Recovery Strategy as having the potential to become important for biodiversity. Proposals should have regard for the LNRS, including demonstrating that they have explored ways to deliver onsite biodiversity improvements that align with the suggested measures set out for this area. Refer to the LNRS mapping tool for further details.

Urban design & heritage

- g) Development layout should be designed to enhance the relationship and connection between the site and the river; and the physical and visual permeability of the site.
- h) The redevelopment of the site creates opportunities to deliver public spaces that support the creation of lively, dynamic and safe environment. These should:
 - i. create their own identity, form and function; and
 - ii. be designed to complement each other rather than directly competing with each other; and
 - iii. be complementary to existing and proposed public spaces within the wider West End area.
- i) The creation of new routes through the sites should consider how to re-imagine, protect or enhance existing views of the city's heritage assets. The inclusion of inspiring public art to support wayfinding is encouraged.
- j) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views and the Raleigh Park view cone (Policy HD6). Views from Raleigh Park and Boar's Hill to the historic core, views out of the historic core, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work, the key views should be discussed and agreed in advance in writing with the City Council.
- k) Applications must be supported by a full assessment of the heights and heritage assets (including the Osney Town Conservation Area so that the full impacts can be understood and assessed (Policy HD3).
- l) The site contains a recorded Bronze Age site and has a high potential for Saxon to medieval trackways. Development proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5).
- m) The masterplan-led approach should consider the form that the existing electricity infrastructure will take as the site is redeveloped; and investigate the development implications of retaining this infrastructure in its current position.

Movement & access

- n) Development proposals should contribute to, promote and support improved sustainable transport links, securing well-designed new and improved routes through the development that prioritise walking, cycling and wheeling.
- o) Any opportunities to open up existing site access points for wider public use should be taken, seeking to deliver high quality well-designed entrances to the site supported by high-quality public realm improvements and enhancements.

- p) Improvements to the public realm that deliver high-quality well-designed civic spaces that prioritise walking, cycling and wheeling should be delivered, securing a well designed internal site layout that promotes good internal site circulation and avoids large cul-de-sacs where possible.
- q) Footpaths and cycleways to and through the site should be provided and existing routes enhanced to increase accessibility and promote permeability. Any new walk, cycle and wheel routes created within the site should be supported by appropriate wayfinding.
- r) The masterplan-led approach should comprehensively address how new and enhanced walking, cycling and wheeling connections will be provided both within the site and into the wider area, including supporting connectivity across the river with the future bridge link from Grandpont to Oxpens.

Additional requirements

- s) Due to likely contamination risks related to previous uses on the site, proposals will be required to include an appropriate site contamination investigation and demonstrate how contamination issues will be resolved where relevant (Policy R7).
- t) Due to the potential impacts of noise from a number of sources, development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise. (Policy R8)

SPCW12: West Wellington Square

Planning permission will be granted for a mix of the following uses:

- Academic institutional uses;
- Residential development (including employer-linked affordable housing in accordance with Policy H4);
- Student accommodation;
- Appropriate uses to the local centre of Little Clarendon Street and Walton Street as set out in Policy C1.

The ~~minimum number of homes to be delivered is~~ development is expected to deliver around 13 dwellings net gain (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied. Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) Development proposals should seek to ensure that the mature and semi-mature gardens and greenspaces to the rear of the properties at Walton Street and to the rear of Wellington Square are retained.
- b) Proposals are encouraged to enhance and improve any other existing greenspaces

Urban design & heritage

- c) Proposals will be required to demonstrate how the design of the scheme has been influenced by and has considered the surrounding heritage.
- d) Proposals should demonstrate how the surrounding designated and no designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach (Policy HD3).
- e) Archaeological assets must be appropriately investigated and responded to (Policy HD5).

Movement & access

- f) Access to the site is limited. As such, Development proposals should deliver a low car residential scheme in accordance with Policy C8.
- g) Non-residential car parking should be in accordance with Policy C8.
- h) Every opportunity should be taken to enhance walking and wheeling links between Walton Street and Wellington Square.

SPN1: Diamond Place and Ewert House

Planning permission will be granted for a mixed-use development including residential use. The development is expected to deliver around 100 dwellings on Diamond Place and 80 dwellings on Ewert House ~~minimum number of dwellings to be delivered is 135~~ (or if delivered as non-self contained student accommodation, the equivalent number of rooms when the ratio is applied). If development is phased, it must be demonstrated that the remaining part of the site can deliver the remaining minimum number of dwellings.

A range of other uses would also be suitable, including the following:

- A community centre. Replacement of facilities will be required if the existing community centre is demolished (Policy C3);
- Healthcare facilities;
- Town centre supporting uses including additional shops/cafes/services/ Class E uses.
- Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI and Hook Meadow and the Trap Grounds SSSI, new development could have impacts on the functioning of these sensitive ecological sites. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the SSSIs. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (Policy G6).
- b) Development proposals must demonstrate that likely significant effects on groundwater recharge and water quality have been avoided, or mitigated where relevant, through the use of appropriate measures including SuDS (Policy G6).
- c) Development proposals involving subterranean development must include a hydrogeological investigation which must demonstrate that likely significant effects on groundwater flow have been avoided, or mitigated where relevant (Policy G6).
- d) Opportunities should be taken to enhance the ecological value of the site and to bring in greening features with considered landscaping.
- e) Greater visual and wildlife links with the green spaces to the east should be achieved by providing green fingers into the site, the current location of the shrubs south of Ewert House providing a particularly strong opportunity to achieve this.
- f) The open space requirement should be delivered in a way that is appropriate to the location of the site within a district centre but also where there are few green spaces and few attractive public outdoor areas to either meet or enjoy time sitting outside.

Urban design & heritage

- g) Development proposals should be designed with consideration of their impacts on the setting of the nearby conservation area and listed buildings (Policy HD3).
- h) Development should take into consideration the potential presence of Prehistoric or Roman archaeological remains (Policy HD5).
- i) Clear visual links through the site will be important to maintain legibility
- j) The site should provide high quality public open space that appeals to all senses and creates an area to meet and obtain respite in the centre of the busy district centre.
- k) New development should be designed to conceal unattractive views of the backs of Banbury Road shops and Ferry Leisure Centre roofline.

- l) Care needs to be taken to avoid overlooking of Summer Fields School, especially the boarding accommodation immediately to the north of the site.

Movement & access

- m) Residential development should be low car.
- n) The City Council will seek to minimise public car parking on the site to a level that is reasonable to serve the area, bearing in mind the public transport connections and its location with a district centre.
- o) The principal vehicular access, particularly to the replacement public car parking, should be from Banbury Road.
- p) Walking, cycling, and wheeling access should be provided through the site from the north to the southeast, connecting to Cherwell School and to Ferry Pool Road, together with walking, cycling and wheeling access safeguarded for any future development of the adjacent Summer Fields School ground. It should be explored whether there is potential for improvements to the restricted width of the existing footpath/cycle way adjacent to the Bowls Club, which links to Cherwell School.

SPN4: Oxford University Press Sports Ground

Planning permission will be granted for residential development, playing pitches and public open space at Oxford University Press Sports Ground. The ~~minimum number of homes to be delivered is~~ development is expected to deliver around 90 homes if the cricket pitch is retained on the site, or more if it is not.

Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) The capacity of the sports provision must be retained unless it can be demonstrated that it is surplus (which is not the case at the current time) or the loss of the sports provision can be otherwise compensated for (Policy G1).
- b) Any alternative provision must be delivered and operational prior to the occupation of residential development on the site.
- c) Public open space will be required onsite (Policy G2).
- d) Opportunities should be taken to create wildlife corridors through the site by enhancing the biodiversity of the hedgerow to the west of the site and connecting it to mature trees in the corner of the Wolvercote Cemetery. Likewise, opportunities should be taken to enhance the existing connection between the semi-natural habitats incorporating the golf course to the north, and the lake and cemetery to the south.
- e) Reprovision of pitches and of public open space along the southern boundary would help provide a buffer to the cemetery and provide a green link to the recreation ground.
- f) High quality green features within the site will be required, and this could be by gardens and landscaping along streets such as verges, planting and swales, which would help achieve the urban greening factor and contribute to biodiversity net gain.
- g) Development should be designed to ensure that there is no adverse impact on the Port Meadow SSSI and will be subject to appropriate traffic mitigation measures.
- h) Biodiversity surveys may need to assess the potential for species using the site or parts of the site as a wildlife corridor (nesting birds, foraging and commuting bats, badgers, reptiles and amphibians).

Urban design & heritage

- i) There is potential for higher density and heights than the surroundings, particularly in the centre and east of the site.
- j) Care will be required to avoid harm to the amenity of existing residential dwellings to the west.
- k) A clear street grid pattern will be appropriate.
- l) Development should take into consideration the potential presence of Prehistoric or Roman archaeological remains (Policy HD5).

Movement & access

- m) Vehicular access to the site should be from Jordan Hill. This is likely to be the only exit and entrance so the road layout will need to allow easy circulation around the site.
- n) The design should ensure walking, cycling, and wheeling access through to the adjacent proposed residential site in Cherwell District Council.
- o) Traffic generation should be limited, with low parking. Appropriate mitigation measures will be required to avoid any significant increase in traffic to the nearby Wolvercote and Cutteslowe roundabouts.

SPS5: Crescent Hall

Planning permission will be granted for residential development and/or student accommodation on the site. The ~~minimum number of dwellings to be delivered on the site is~~ development is expected to deliver around 75 net gain (or, if delivered as student rooms, the number of rooms that equate to this when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) Proposals should seek to retain existing features where possible, particularly higher quality elements like large mature trees, many of which are protected under a TPO as well as boundary features that help preserve amenity.
- b) Green infrastructure should be enhanced in lower quality areas with a greater variation in planting and new habitat around the new buildings.
- ~~c) The potential presence of priority species/habitats on the site (roosting bats and nesting birds) should be investigated through appropriate biodiversity surveys and any impacts on these addressed accordingly.~~

Urban design & heritage

- d) In the case of infill development, proposals should complement the materials of the existing development (Policy HD1).
- e) Proposals should be designed in a way that is sensitive to the Temple Cowley Conservation Area of which it lies adjacent to, particularly regarding heights, massing, roofscape and impacts on local character and street scene (Policy HD3).
- f) Opportunities should be taken to improve the interface with the surrounding streets, particularly along Crescent Road and Hollow Way.

Movement & access

- g) Opportunities should be taken to consolidate car parking and reduce the car dominated feeling of the buildings within the site.
- h) Circulation within the site should prioritise walking, cycling and wheeling.
- i) New residential development should be low car.
- j) Unless a safe alternative can be demonstrated, the principal access should remain in the same location, although opportunities to increase permeability for walkers, cyclists and wheelers should be considered.

SPE11: Oxford Brookes Marston Road Campus

Planning permission will be granted for residential development. The development is expected to deliver around ~~with the minimum number of~~ 42 dwellings ~~delivered~~ (or, if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied). Other complementary uses will be considered on their merits.

Open space, nature, flood risk

- a) As the site falls within the identified impact risk zone for the New Marston Meadows SSSI, new development could have impacts on the functioning of this sensitive ecological site. Planning permission will only be granted if it can be demonstrated that there would be no adverse impacts on the integrity of the New Marston Meadows SSSI. Development proposals should reduce surface water runoff in the area and should be accompanied by an assessment of groundwater and surface water. Development proposals must incorporate sustainable drainage with an acceptable management plan (Policy G6).
- b) The main Milham Ford Nature Park should be excluded from any development area, and the designated internal quad should be retained (Policy G6).
- c) Development proposals should seek to enhance and connect the existing green infrastructure, specifically between the Milham Ford Nature Park, inner quad and the surrounding GI network (Policies G1 and G2).
- d) The tree lines on the perimeter are ~~mature well-established~~. They provide amenity for the residential neighbours and for occupiers of the site and should be retained where possible.
- e) Proposals for the site, regardless of the development options, should include more natural features and surface cover types to enhance the Urban Greening Factor score for the site (Policy G3), the policy requirements for which will require an uplift from existing levels regardless of the use.

Urban design & heritage

- f) Proposals on this site should respond positively to the directly adjacent Headington Hill Conservation Area context (Policy HD3).
- g) Design proposals should acknowledge the Milham Ford School buildings status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance.
- ~~h) Reuse of the original building fabric is encouraged where this is feasible, not only to respect the local historic significance of the site but also for sustainability reasons. Because of the designation of the inner quad as a Local Wildlife Site, it should be retained as open natural space even if wholesale redevelopment of the site is the chosen option.~~

Movement & access

- i) Proposals should explore opportunities to improve non-vehicular movement through the site, particularly from north to south. Car free and low car development proposals will be strongly supported.