Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name:

Organisation (if applicable):

Address:

[redacted]

Email:

Date:

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	`	Sustainability Appraisal	`

Q2. Do you consider that the document:

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

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

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

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

`

Please use an extra sheet if completing a paper copy.

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

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

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CDT/AMM/EB/DP6544
13 March 2026

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
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By email to planningpolicy@oxford.gov.uk

Dear Planning Policy Team,

Oxford Local Plan 2045
Submission Draft (Regulation 19) Consultation

Oxford City Council ('the Council') is currently consulting on the Oxford Local Plan 2045 Submission Draft (Regulation 19) ('the Draft Local Plan'). These representations, prepared by DP9 Limited ('DP9') on behalf of Oxford University Development Ltd ('OUD'), relate to the Draft Local Plan and focus on its potential implications for future redevelopment of the Osney Mead site.

OUD is a joint venture partnership bringing together the land and opportunities of Oxford University with the investment and development management skills of Legal & General. OUD's vision is to design and deliver an exemplary, sustainable development that meets the future needs of Oxford University, contributes to the wider economy of Oxfordshire and creates economic and social benefits for local communities. Osney Mead is one of several sites that OUD is seeking to bring forward and is a major strategic development site identified by the Council as playing a crucial role in realising the vision and objectives set out within the draft Local Plan.

These representations follow on from OUD's previous representations (submitted on the 8th August 2025) on the Preferred Options Draft (Regulation 18). Before this, OUD also made representations on the (now withdrawn) Draft Local Plan 2040, including representations submitted for the Preferred Options Local Plan stage in November 2022 and Proposed Submission Draft stage in January 2024 and associated discussions with the Council regarding the site allocation wording for Osney Mead (October/November 2025).

OUD continues to generally support the vision and aspirations of the Draft Local Plan but makes the following representations on specific policies below.

Chapter 2: A Healthy Inclusive City to Live In

Draft Policy H3: Affordable Housing Contributions from Other Development Types

The draft policy requires the following for new employment generating uses:

- *"A financial contribution will be sought towards the delivery of affordable housing from proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment generating use, delivering a net gain in floorspace of 1000sqm GIA or more.*
- *Where description of development is listed as flexible class E, it will be assumed that all of it is employment-generating (unless specified otherwise in the planning application). This is to avoid proposals circumventing the policy and providing appropriate contributions towards affordable housing."*

BNPP Paribas Real Estate have prepared the Oxford City Council: Local Plan Viability Assessment Update (December 2025). The assessment states the following:

> *"Contributions towards affordable housing from employment generating uses: the emerging plan incorporates a requirement for employment generating uses to contribute £10 per square 82 metre towards affordable housing provision. This requirement has a very modest impact on development, ranging from less than 1% of residual value for offices and between 1 to 4% for other uses."*

Although the assessment notes that it will have a modest impact on development it is important that the viability assessment needs to demonstrate specifically that the site allocations, particularly those of strategic scale, have been tested fully and account has been made of such sites incurring abnormal and extraordinary costs. Without this it is not possible to consider the soundness of the proposed policy. There needs to be flexibility to look more thoroughly at viability at the application stage. The current wording (stated above) is broad brush and is not fit for purpose for schemes of the scale and complexity of Osney Mead.

Notwithstanding the further viability assessment, the draft policy should be amended (amendments underlined) as follows:

- *"<u>Subject to viability</u>, a financial contribution will be sought towards the delivery of affordable housing from proposals for major employment-generating uses (defined in Glossary), or flexible E-Class uses which could be used for employment generating use, delivering a net gain in floorspace of 1000sqm GIA or more.*
- *Where description of development is listed as flexible class E, it will be assumed that all of it is employment-generating (unless specified otherwise in the planning application). This is to avoid proposals circumventing the policy and providing appropriate contributions towards affordable housing."*

In addition, the Council, in August 2025, adopted new CIL rates which include a 400% increase in the levy charges for Class E, B2 and B8 uses. When considering the new CIL rates and the proposed Policy H3, OUD is concerned that this could adversely impact the deliverability of Osney Mead. In turn, this raises risk that the deliverability of the Draft Local Plan (as well as the current adopted West End and Osney Mead SPD) will be undermined.

<u>Draft Policy H4: Employer-Linked Affordable Housing</u>

Osney Mead is specifically identified as an appropriate site for employer-linked affordable housing for rent.

The policy context section (page 7/page 8) give the context to this proposed policy, highlighting the shortage of homes in Oxford that are affordable to local people working in the City, particularly where jobs are not possible to carry out remotely, such as at R&D facilities. These bullet points highlight that people can be discouraged from taking jobs in Oxford if they cannot afford to live close enough to their place of work, and many employers have recruitment and retention difficulties associated with the lack of affordable housing in Oxford.

The draft policy text section goes on to explain that employer-linked affordable housing was introduced in current Local Plan, as an additional means to help increase affordable housing. It explains that employer-linked housing involves housing being developed on specified sites, by specified key employees, to provide a means of delivering affordable housing for their own staff. This paragraph also highlights that, for most of the specified sites, employer-linked affordable housing will only be one element of use on the site. This would be the case with Osney Mead, which is principally a commercial opportunity; however, the site will contain some academic uses linked to the University and therefore could possibly contain employer-linked affordable housing.

As per previous representations, OUD supports the principle of referencing Osney Mead as a possible location for employer-linked affordable housing – but the deliverability of such housing – as well as other housing products more generally – will be dependent on a range of factors, including the significance of flooding as a land use constraint as well as scheme viability.

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

Draft Policy E4: Affordable Workspace

Osney Mead is specifically referenced as a site that will be expected to deliver a strategy for affordable workspace if the development proposals delivery a net gain of 5,000 sqm GIA or more employment generating uses (or flexible E-Class uses which could be used for employment generating uses).

There is not a specific percentage requirement proposed for the affordable workspace. This is supported by OUD as it allows flexibility for the provision of affordable workspace to be subject to matters of viability, need and site specific circumstances.

Chapter 4: A Green Biodiverse City that is Resilient to Climate Change

Draft Policy G7: Flood Risk and Flood Risk Assessments (FRAS)

A Sequential Test has been undertaken to support the Sustainability Appraisal, and Osney Mead has been assessed through policy SPCW8 (SHLAA Ref: 586). Within the Sequential Test, Background Paper 9a is referenced and deals with brownfield development within FZ3b. Whilst draft policy G7 is clear, it would be helpful to see sight of Background Paper 9a as it is not on the Council's website. We are not necessarily suggesting that it would change the policy position, however it would be helpful to review and have the opportunity to provide further comment.

Part q) of the draft policy requires development to "*not lead to a net increase in the built footprint of the existing building within Flood Zone 3b and where possible will lead to a decrease"*. Whilst we agree to the no increase in building footprint in the functional floor plain, at ground level, we have already been discussing with the Environment Agency about increasing the footprint of buildings within Flood Zone 3b at first floor and above at Osney Mead. The current wording of the draft policy significantly reduces the viability of any scheme coming forward at Osney Mead and should be amended to ensure development can come forward. Part q) of the draft policy should state:

> "*Development in Flood Zone 3b should not lead to a net increase in built footprint of the ground floor of the existing building footprint."*

A balanced and pragmatic approach is required from the Environment Agency and the Council on this point and then policy must reflect this position.

Draft Policy G8: Sustainable Drainage Systems (SUDS)

Overall, the draft policy is in line with relevant National Planning Policy Framework policies covering SUDS, however the draft policy is more stringent on the types of SUDS features that are deemed appropriate. It would be helpful to understand why the proposed SUDS features are the ones that are considered acceptable to the Council and for this explanation and rationale to be provided.

The draft policy states the following: *"below ground features such as pipe systems or underground attenuation tanks will not be permitted"* and *"Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable".* The draft policy should be amended to allow greater flexibility for proposed SuDS measures. The draft should be amended (underlined) as follows:

> *"Natural, landscape-based attenuation features are encouraged rather than below ground features such as pipe systems or underground attenuation tanks ~~will not be permitted~~"*

Chapter 5: A city that utilises its resources with care, protects the air, water and soil, and aims for net zero carbon

Draft Policy R1: Net Zero Buildings in Operation

As per previous representations, OUD support the delivery of exemplary sustainable development and targets for net zero carbon in operation.

Part e) of the policy states:

> *"all energy needs will be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage where possible. Where the total energy need cannot be met through onsite renewables, applicants should seek to maximise available capacity onsite, before seeking to meet the remaining energy balance through installation of sufficient additional renewable generation at a location offsite. In these circumstances, it will need to be demonstrated in the Energy and Carbon Statement that offsite provision has been fully secured and will be in operation upon completion of the development.*

As a last resort, where the above steps have been fully explored and net zero carbon still cannot be fully delivered, offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location. The City Council will accept payment into its offsetting fund to fully offset this remaining energy demand, and this will be secured through an appropriate legal agreement/S106."

It is positive that the Council have now set out specific Energy Use Intensity (EUI) targets for non-residential uses at 70kWh/m2/yr for non-residential developments, noting that for non-residential uses with exceptionally high energy demands, including R&D/labs, a higher EUI target will be accepted where it can be robustly justified. This is welcomed by OUD.

As stated above, carbon offsetting is the last resort. The applicable amount (£ per tonne of Co2), as supported by evidence should be clarified in the policy, in the event that off-setting is required and for transparency in line with the viability considerations set out in Policy S4.

Draft Policy R2: Embodied Carbon in Construction

Draft policy R2 relates to expectations for the consideration of embodied carbon in the construction process. As per previous representations, whilst OUD is supportive of the principle of this policy to meet Net Zero objectives, the policy needs to acknowledge that the feasibility of retaining existing buildings does not just relate to technical considerations such as structural limitations or operational requirements.

Wider objectives of the Draft Local Plan, including the planning requirements for the site, are also an important consideration in the question of demolition. Sometimes demolition is the only route to achieve strategic transformation objectives and although there may be higher embodied carbon costs associated with this route initially, it may derive larger carbon savings in the future, along with wider social and economic benefits. On this basis, it is crucial that the policy is a retrofit/refurbishment-first policy as opposed to a retrofit/refurbishment only policy. To some extent, this is addressed in criteria (a) of the policy which highlights that the re-use of any existing buildings should be explored and robustly demonstrated to be unfeasible before resorting to demolition, but the wording around potential benefits of building replacement should be included too. Part a) should be re-worded as follows:

"Re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible and the benefits of building replacement are greater, before proposing ~~resorting to~~ demolition."

Chapter 6: A city that Respects its Heritage & Fosters Design of the Highest Quality

Draft Policy HD2: Making Efficient Use of Land

Draft policy HD2 sets out that planning permission will only be granted where development proposals make efficient use of land and maximise capacity, and that sites across the City will be capable of accommodating development at an increased scale and density to their surroundings. Conversely, draft policy HD6 Views and Buildings Heights sets out that planning permission will only be granted for development that will retain the special significance of views of the historic skyline of the Historic Core Area.

OUD would encourage further guidance within the Draft Local Plan as to how strategic site allocations including Osney Mead balance these competing policy interests to deliver the required intensification and benefits.

OUD also generally encourages the Draft Local Plan to recognise that large-scale redevelopment and regeneration projects need to acknowledge existing context but also can create new transformative contexts.

OUD suggested that part C is amended as follows:

> *"Proposals should demonstrate that the built form:*
>
> *c) Is informed by an understanding of the impacts on the significance of designated and non-designated heritage assets, including their setting and the potential for archaeological remains, whilst recognising the benefits of the increased scale and density of the surroundings"*

Draft Policy HD6: Views and Building Heights

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. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map"*.

This policy wording does not mention whether it can be demonstrated that the substantial harm or total loss to a designated heritage asset is necessary to achieve substantial public benefits that outweigh that harm or loss, as set out in the NPPF (Paragraph 214). Although the NPPF requirement would still apply when a development proposal is assessed, we suggest that additional wording should be added to this policy to include that any harm should be weighed against any public benefits.

The revised NPPF (December 2025), which is currently out for consultation, places greater focus on providing possible support for bringing forward heritage-related development on brownfield sites (Part 3 of Policy HE6: Proposals affecting designated heritage assets). Chapter 20 of the revised NPPF states *'Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.'* This should be reflected in the Draft Local Plan.

Chapter 7: A Liveable City with Strong Communities and Opportunities

Chapter 7 includes a section on 'Transport and Movement in Oxford to Help Create a Liveable City'. OUD welcomes the commitment within the Draft Local Plan to support Oxford County Council's measurers set out in Oxfordshire Local Transport Connectivity Plan, which encourage a move away from private vehicle journey's where possible and support active travel options and public transport.

Draft Policy C6: Transport Assessments, Travel Plans and Service and Delivery Plans

Draft policy C6 part f refers to design standards set out in the Oxfordshire County Council Street Design Guide. It is our understanding that Oxfordshire County Council are in the process of preparing an updated Street Design Guide and the Draft Local Plan should make reference to the updated guide when it is adopted.

Draft Policy C7: Cycle and Powered Two Wheelers Parking Design Standards & Draft Policy C8: Motor Vehicle Parking Design Standards

It is understood that the parking design standards are linked to Oxfordshire County Council's Parking Design Standards for New Developments. The County Council adopted the parking standards in 2022 and is currently in the process of updating their standards (decision due 21st April 2026 by Cabinet). Draft policy C7 and C8 should make reference to the updated County Council parking standards when they are adopted and ensure that the parking policies and standards are aligned.

Chapter 8: Infrastructure, Area of Focus, and Site Allocations

Draft Policy SPCW8: Osney Mead

OUD strongly support the inclusion of Osney Mead in the West End and Botley Road Area of Focus and the recognition in the Draft Local Plan of the significant development and regeneration opportunities here.

As part of the preparation of the Draft Local Plan, in October 2025, the Council consulted OUD on the draft site allocation for Osney Mead. We had previously sent some minor comments on the draft site allocation. These comments have not been picked up and therefore still stand (Appendix One).

Summary

OUD thanks officers to date for their collaboration on the opportunity at Osney Mead and look forward to continuing discussions with the Council about the policy environment for Oxford and at Osney Mead more specifically.

We trust these representations will be taken on board in progressing with the submission of the Draft Local Plan to examination.

Yours faithfully

[redacted]

DP9 Ltd.

Appendix One: Site capacity assessment – Local Plan 2045, Osney Mead (SHLAA Reference 586)
OUD Comments

Policy 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 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 where possible, 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)**