www.oxford.gov.uk

OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Arron Twamley

Organisation (if applicable): Arc Planning Associates

Address: [redacted]

Email:

Date: 5 March 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.

	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?	◉	○

Planning Associates

Sarah Harrison
Team Leader Planning Policy
[redacted]

[redacted]
Date: 27th February 2026

Dear Ms Harrison,

REPRESENTATIONS TO OXFORD LOCAL PLAN 2045 PROPOSED SUBMISSION DRAFT (REGULATION 19) ON BEHALF OF OXFORD HEALTH NHS FOUNDATION TRUST

On behalf of our client Oxford Health NHS Foundation Trust (herein 'The Trust') we have prepared representations to the Oxford City Council ('OCC') Local Plan 2045 Proposed Submission Draft Consultation (Regulation 19) in the context of the Trust's land holdings within Oxford.

ABOUT THE OXFORD HEALTH NHS FOUNDATION TRUST

The Trust provides physical and mental health care for people of all ages across Oxfordshire, Buckinghamshire, Swindon, Wiltshire, Bath and North-East Somerset. Its services are delivered at community bases, hospitals, clinics and in people's homes.

The Trust's aim is to improve the health and wellbeing of its patients and families. It works in partnership with a range of organisations including:

- The University of Oxford to promote innovation in healthcare, support research and to train doctors and psychologists;
- Oxford Brookes University and the University of Bedfordshire to train nurses and allied health professionals;
- Local authorities and voluntary organisations; and
- GPs across all the locations served by the Trust to provide integrated care.

With over 5,000m^2 of floorspace located across 30 unique, mostly ageing sites in the city, the Trust's estate is large, inefficient and in urgent need of transformation. It has expanded to reflect the diverse nature of the organisation it serves with its core infrastructure located at The Warneford Hospital (mental health), The Fulbrook Centre (City Community Hospital) and Littlemore Mental Health Centre (mental health, forensics and the Trust's HQ).

In addition, there is a significant number of flexible, more specialist assets such as Luther Street Medical Centre (homeless GP service) and The Slade Hospital adult and children's mental health dispersed across the whole city along with a large, transient grouping of buildings typically used by community teams and the Trust's talking therapy services on a more ad-hoc basis.

The nature of the Trust's dispersed estate is largely the product of organic / ad-hoc growth, much of which has taken place in the last 10-15 years following legislative changes (brought about mainly by the Health and Social Care Act 2012) which resulted in former Primary Care Trust properties being transferred to the Foundation Trust (examples include The Fulbrook Centre, South Parade Health Clinic and Cornwallis House) or contractual changes as in the case of the Learning Disabilities Service which was novated to the Trust from Southern Health in 2015 along with the freehold interest in The Slade Hospital.

To better understand its estate, the Trust is preparing a new Estates Strategy that will build on the Government's recently published white paper setting out the vision for healthcare across England for the next ten years. Further details relating to the Trust's strategic priorities for the city and wider Oxon area will be published later this year.

The Trust has ambitions to transform how care is provided across a number of core bases across the city including, but not exclusively, Manzil Way Resource Centre in Cowley, Slade House in Headington, and Littlemore Mental Health Centre. This follows the recently completed new healthcare hub created at Jordan Hill Business Park in north Oxford.

The Trust's plans for Warneford Park are set out in planning application reference 25/01859/OUTFUL which is due for determination next month; Warneford Park is therefore not covered within this representations letter.

45 SANDFORD ROAD, OXFORD

The Trust has recently received positive pre-application response from South Oxfordshire District Council ('SODC') regarding the redevelopment of 45 Sandford Road for key worker homes. This site lies just outside the administrative area of OCC, but it's linked to the wider redevelopment of Littlemore Mental Health Centre. The proposals will replace aging nurses' accommodation called 'Springfields'. This will free-up space within Littlemore Mental Health Centre for additional healthcare. As plans develop for the site the Trust will consult both SODC and OCC as part of pre-application discussions. This matter discussed in more detail within the table below titled Littlemore Mental Health Centre.

THE TRUST'S REPRESENTATIONS

We provide representations for the following sites:

- **Slade House (Policy SPE15)**

Oxford Local Plan 2045 Submission Draft (Reg 19)	The Trust's Response
Planning permission will be granted at the Slade House site for: ▪ improved & expanded healthcare facilities; ▪ associated administration; ▪ employment-generating use (of no bigger area than that present on the site at the time of adoption of the Plan); and/or ▪ residential development, including employer-linked affordable housing; and ▪ Other complementary uses will be considered on their merits, including academic institutional	The Trust will continue to provide statutory healthcare services from this site subject to the outcome of the estate strategy review referenced above. At the time of writing, the site is likely to be redeveloped as a new Children's Neighbourhood Hub in line with the government's 10-year plan for the NHS. The Trust welcomes the residential allocation however, in order to achieve financial viability, it may also seek to develop an element of private housing in addition to the employer linked affordable component. It would not wish to exclude other complementary uses on the site including

and education uses.	improved & expanded health care facilities, associated administrative functions and extra care or student accommodation.
Open space, nature, flood risk	A masterplan will be prepared, the broad aim of which will be a landscape-led solution, acknowledging constraints presented by the existing trees and greenspaces and the associated biodiversity.
Urban design and heritage	The masterplan will maximise development potential, respect any heritage constraints and minimise amenity impacts.
Movement and access	The redevelopment will mitigate against traffic impacts and maximise access by pedestrians and cyclists.
Additional Requirements	The redevelopment will respond to the potential constraints presented by existing noise and air quality levels.
Local Plan 2045 Policies Map	No comments.

- **Manzil Way Resource Centre (Policy SPE8)**

Oxford Local Plan 2045 Submission Draft (Reg 19)	**The Trust's Response**
Planning permission will be granted at Manzil Way Resource Centre for: ▪ improved healthcare facilities; ▪ associated administration; and/or ▪ residential development, including employer-linked affordable housing and/or student accommodation. ▪ Other complementary uses will be considered on their merits	It is envisaged that the Trust will continue to provide statutory healthcare services from this site, subject to the outcome of the estate strategy review referenced above. In turn, the Trust also welcomes the residential allocation however, it may also seek to develop an element of private housing in addition to the employer-linked affordable component. It would also not wish to exclude other complementary uses on the site including improved health care facilities, associated administrative functions and extra care or student accommodation.
Open space, nature, flood risk	A masterplan will be prepared which will include urban greening and will seek to maximise biodiversity opportunities.
Urban design and heritage	The masterplan will seek to maximise development potential, whilst also responding to the site setting, including the potential impact on the Crescent Road view cone. It will also seek to respond to any heritage constraints and minimise amenity impacts.
Movement and access	The redevelopment will mitigate against traffic impacts and maximise access by active modes of travel. It will also attempt to reduce parking.
Additional Requirements	The proposals will include an appropriate site contamination investigation.
Local Plan 2045 Policies Map	Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to SPE8.

- **Rectory Centre (Policy SPE12)**

Oxford Local Plan 2045 Submission Draft (Reg 19)	The Trust's Response
Planning permission will be granted at the Rectory Centre for: ▪ improved health-care facilities; ▪ associated administration and/or ▪ residential development, including student accommodation. ▪ For a residential scheme, the minimum number of homes to be delivered is 21 (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. ▪ Development of this site for residential use would lead to the loss of community facilities, so these should be re-provided elsewhere, in accordance with (Policy C3), which may be through consolidation onto other healthcare sites.	We welcome the intention to allocate the site for residential purposes, and we consider it to be suitable for at least 21 dwellings. We consider there is scope to increase height to match surrounding building heights along the Cowley Road. However, it is also recognised that the proposed height should respect the Crescent Road view cone. Health uses currently on the site would be re-provided as necessary, or elsewhere on other sites owned by the Trust in Oxford. We would also like the policy to include employer linked affordable housing.
Open space, nature, flood risk	Any future planning application for the site will include opportunities for new green infrastructure and seek to maximise biodiversity opportunities.
Urban design and heritage	Future proposals will maximise development potential, whilst also responding to the site setting, including impacts on the Crescent Road view cone. The proposals will also respond to any heritage constraints and minimise amenity impacts.
Movement and access	The redevelopment will mitigate against traffic impacts and maximise access by active modes of travel.
Additional Requirements	The proposals will include an appropriate site contamination investigation.
Local Plan 2045 Policies Map	No comments.

- **Littlemore Mental Health Centre (Policy SPS9)**

Oxford Local Plan 2045 Submission Draft (Reg 19)	The Trust's Response
Planning permission will be granted at Littlemore Mental Health Centre for: ▪ hospital use; ▪ associated residential development which may include employer-linked housing or student accommodation. ▪ Other complementary uses will be considered on their merits	The Trust has undertaken initial planning feasibility work based on the following objectives: ▪ Maintain and enhance the existing operational functions, but explore the potential for 'transformational growth' including additional operational facilities such as additional inpatient capacity and accommodation for expanding

	outpatient services ▪ Potentially provide facilities for other healthcare services i.e. primary care, community services, third sector etc ▪ Enhance existing areas of green space / biodiversity and their contribution to therapeutic treatments ▪ Provide better car parking management and improved accessibility As stated above The Trust is also exploring ways of improving employee-linked housing to replace an ageing accommodation block ('Springfields'). One idea under consideration is to relocate this key worker housing to nearby 45 Sandford Road within the administrative area of South Oxfordshire District Council ('SODC'). The Trust has recently received a positive pre-application response from SODC regarding the redevelopment of 45 Sandford Road for employer linked housing and this development opportunity is now being further explored. As proposals for the site develop the Trust will consult both SODC and OCC as part of the pre-application discussions.
Open space, nature, flood risk	A masterplan will be developed which will enhance existing greenspace, maximise biodiversity opportunities and minimise surface water runoff.
Urban design and heritage	The masterplan will seek to maximise development potential, but also respond to the constraints imposed by nearby heritage assets and, potentially, local noise and air quality levels.
Movement and access	The proposals will provide a more efficient system for managing parking, as well as improved accessibility (to be set out within a transport assessment and travel plan).
Additional Requirements	The proposals will include an appropriate site contamination investigation.
Local Plan 2045 Policies Map	No comments.

THEMATIC POLICIES

- **Draft Policy H4: Employer-linked affordable housing**

We welcome the additional reference to Littlemore Mental Health Centre as a suitable location (in addition to the Trust's other assets at Slade House, Manzil Way, Rectory Centre and the Warneford Hospital) which reflects the fact that it already provides staff residences albeit very limited (60 No. flats) in outdated accommodation. We would also draw the Council's attention to the site-specific comments above

regarding employer-linked affordable housing at the Littlemore Centre.

We are concerned that Criterion (f) requires an unspecified and potentially unjustified level of control and approval over the employer's affordable housing approach. We accept that the controls identified in criteria a) to e) should be controlled through a legal agreement, however we consider that criteria f i) to f iii) exert an unacceptable and unworkable degree of control over assets which are not in the control of the City Council.

We therefore request that the policy is modified to read as follows:

f) A legal agreement will be required to secure the benefits of this policy. ~~In addition, the legal agreement will be used to:~~

~~I. agree the allocations policy;~~

~~II. agree an appropriate re-letting of units in the property in the event that there are units vacant for more than 6 months;~~

~~III. agree that if the employer decides they no longer have a need for the housing, then the affordable housing requirements detailed under Policy H2 will be applied.~~

- **Draft Policy H5: Mix of Dwelling Sizes (number of bedrooms)**

We recognise a mix of dwellings sizes is required to provide a balanced community, and to meet specific housing needs at a particular time. We are pleased to see this policy does not apply to employer-linked affordable homes.

We support higher density developments in District Centres; this applies to the Trust's sites at Manzil Way Resource Centre and Rectory Centre which are located within Cowley Road District Centre.

- **Draft Policy H7 (Houses in Multiple Occupation)**

We consider HMOs offer an affordable solution for some individuals as opposed to renting individually or buying a property. We do however recognise that high concentrations of HMOs can result in changes to the character of the local area and can exacerbate amenity and parking issues.

However, we consider criterion a) (relating to the proportion of HMOs in a 100-metre street length) should not apply to the Trust's sites. The Trust requires complete flexibility to provide staff accommodation on its sites, and it is considered that criterion a) as currently drafted could unacceptably limit the supply of new HMO accommodation on the Trust's sites.

We therefore request that an exclusion is incorporated to Criterion a) to clarify that it applies to public streets rather than those within a privately owned estate, such as those owned by the Trust.

- **Local Plan 2045 Policies Map**

As stated above, Manzil Way Resource Centre is incorrectly labelled policy SPE7 on the policies map and should be changed to policy SPE8.

CONCLUSIONS / NEXT STEPS

We are pleased to have the opportunity to comment on behalf of the Trust in relation to the first draft consultation Oxford Local Plan 2045 Submission Draft Consultation (Regulation 19).

We would appreciate being kept informed as the emerging Local Plan progresses and would also welcome a further meeting with you and your colleagues in regard to 45 Sandford Road and the strategic opportunities that it represents.

If you have any further questions about the site and our representations or require a meeting, please do not hesitate to contact me.

Kind regards,

[redacted]

Arron Twamley MRTPI
Director, Arc Planning Associates

CC Oxford Health NHS Foundation Trust

Nigel Hawkey, Arc Planning Associates