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Oxford Local Plan 2045

Submission Draft

COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Jonathan Bainbridge (on behalf of Pioneer Group)

Organisation (if applicable): Bidwells LLP

Address: [redacted]

Email:

Date: 17/03/2026

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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.

- [x] 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

Your ref: OLP2045 (Reg 19)
Our ref: JB80435
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 PROPOSED SUBMISSION (REGULATION 19) CONSULTATION RESPONSE ON BEHALF OF PIONEER GROUP.

I write on behalf of The Pioneer Group ('Pioneer') in response to the Oxford Local Plan 2045 Proposed Submission (Regulation 19) consultation.

Pioneer Group in Brief

Pioneer's mission is to help life sciences and high-tech businesses to thrive, tackling challenges in both human and planetary health. Across the UK and Ireland, Pioneer leads the way in integrating delivery of mission critical real estate alongside the critical venture building and venture investment which is required to grow scientific enterprise within the UK.

As a leading developer and operator of life science and high-tech campuses, Pioneer manages over £1 billion of real estate (over 4 million square feet) in 12 leading innovation locations across the UK and Ireland. Pioneer's campuses offer a range of flexible, specialist laboratories and office space to support scientists, technologists, engineers, and entrepreneurs on every step of their journey from R&D to manufacturing. Pioneer's campuses are home to organisations ranging from start-ups to multi-nationals.

In 2024, as part of a partnership with The Crown Estate, Pioneer announced an intention to deliver new development bespoke to the needs of Oxford Science Enterprise ('OSE'). OSE is a locally success story, and one of the world's leading builders of scientific spinouts and enterprise.

OSE has created a significant science-business ecosystem, increasing investment in university spinouts from an average of £125m per year (2011-2015) to £1.4bn in 2021. Having supported the development of 80 transformational companies OSE has developed an exciting pipeline of opportunity which needs flexible bespoke space to grow and develop.

With its partners, and aiming to satisfy the needs of OSE's pipeline, Pioneer Group is currently promoting developments at 1-12 Magdalen Street, and Ozone Leisure Park.

1-12 Magdalen Street

Located in Oxford City Centre, 1-12 Magdalen Street is positioned on the prominent junction of Magdalen

Street, Cornmarket Street, George Street, and Broad Street. Following the collapse of the Debenhams retail business in 2019/20, the large department store unit has remained vacant. The Crown Estate ('TCE') has acquired a long leasehold interest over the parts of the existing building which Debenhams formerly occupied.

Bridging Oxford's world leading research and high-quality city centre amenity, Pioneer is working in partnership with TCE to repurpose the existing building, creating a new life science centre for the benefit of OSE's locally grown pipeline of scientific research.

In addition to substantial employment generation, the development will facilitate wider enhancement of the city centre, and alongside public events and exhibitions will seek to celebrate and inform the community of Oxford of the world leading science taking place on their doorstep. Combined with planned outreach and engagement, it is hoped this will support enhanced STEM and inspire the next generation of home-grown scientists.

Ozone Leisure Park

In June 2025 a full planning application was submitted for the redevelopment of the Ozone Leisure Park on behalf of Pioneering Development Services (Oxford) LLP, Firoka (Oxford Leisure) Limited and Firoka (Priory Hotel) Limited.

With existing leases approaching their natural end, it is clear that there presents a significant opportunity to provide a consolidated leisure function more appropriate to today's requirements, whilst making the best possible use of the site for research and development. In parallel the development will sensitively restore the Grade II* listed Minchery Farmhouse and deliver substantial new public realm.

The development will see significant employment creation, including non-technical positions and vocational pathways for skilled work. It is also expected to be a significant contributor to the Cowley Branch Line, a project which Pioneer Group fully supports.

The site boundary largely aligns with draft allocation 'Policy SPS13: Ozone Leisure Park and Minchery Farmhouse'.

OLP 2045 – Consultation Response

At the outset of these representations, Pioneer wishes to express in principle support for the development of the plan. Oxford is the third most intensive science and innovation cluster in the world and is ranked first globally for its research and second for life sciences research more specifically. It is right therefore for the Council to set out explicit support within its *"vision for Oxford in 2045"* for research and development in the life science and health sectors.

The vision broadly aligns with the requirements of the adopted National Planning Policy Framework (2024) ('the Framework "/ "NPPF") which notes the following:

> "[Development Plans should] *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration"* - (Para 86a) – adopted NPPF.
>
> "[Development Plans should] *set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration. In doing so they should take into*

> *account both local business needs and wider opportunities for economic growth, including priority places for investment in key sectors set out in the Industrial Strategy, and the location of Industrial Strategy Zones and AI Growth Zones"* - (Para E1(1)(a) – draft NPPF.

However, we would underline the following requirements of the Framework for:

Adopted NPPF (December 2024)	Draft NPPF (December 2025)
Planning policies to "help create the conditions in which businesses can invest, expand and adapt…" with significant weight being placed on "the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential." **(Paragraph 85)**	Development plans to "seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment" **(Paragraph E1(1)(b)).**
Planning policies to "recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries…" **(Paragraph 86)**	Development plans to "allocate sites to implement the economic vision and startegy and meeting existing and anticipated needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. This includes: i. clusters, networks and sites for knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure to support the growth of these industries (including laboratories, campus facilities, data centres and associated generating capacity, and grid connections)" **(Paragraph E1 (1)(c)(i)).**

It is within this context that we write on behalf of Pioneer, with regards to the following draft policies:

- **Policy S3:** Infrastructure Delivery in New Development
- **Policy S4:** Plan Viability
- **Policy H3:** Affordable Housing Contributions from New Commercial Development
- **Policy E1:** Employment Strategy
- **Policy E4:** Affordable Workspaces
- **Policy R2:** Embodied Carbon
- **Policy HD2:** Making Efficient Use of Land
- **Policy HD6:** Views and Building Heights
- **Policy C1:** City, District and Local Centres

We respond to these policies, in the order they appear within the Regulation 19 document.

Policy S3: Infrastructure Delivery in New Development

OBJECTION – Draft Policy S3 states "*Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be expected to mitigate their impact, both individually and cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development*".

The policy goes on to state "*Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project*…".

114.1 S3 UNSOUND c.effective, d.consistent

Whilst the spirit of the policy is laudable, we take an in-principle issue with the approach of restricting development in policy terms, due to a failure to invest in the required strategic infrastructure to unlock growth. It is the role of the strategic policy making authorities to deal with such cross-boundary issues in collaboration with infrastructure providers.

While developers can and should play a role in supporting Council and infrastructure provides, broader strategic decisions and funding for comprehensive infrastructure should be a collaborative effort involving local authorities, regional planning bodies, and where necessary national government.

Referring to Cambridge North (APP/W0530/W/23/3315611)**,** this position has previously been adopted in decision making by a previous Secretary of State. In the context of water supply pressure, the Inspector noted that '*Both the NPPF and the Planning Practice Guidance (PPG) state that the supply of water and water quality are not normally matters for individual planning applications because they are of a strategic natur*e'.

Without prejudice to this opinion, Pioneer wishes to place on record its strategic support for efforts underway within the city to resolve some of the most pressing infrastructure constraints, and further underline backing for the Cowley Branch Line – which has the potential to be transformative for the City and region.

Policy S4: Plan Viability 114.2 S4 UNSOUND b.justified

OBJECTION – Policy S4 states that *"The policies in the Plan have been viability tested and planning applications that fully comply with them will generally be assumed to be viable."* However, there appears to be a lack of alignment between this position and the conclusions of the Council's own Viability Appraisal. The Appraisal acknowledges that *"the cumulative impact on viability is hugely variable and it is likely that some trade-offs between policy objectives will be required at the development management stage. It would be difficult to set a suite of policies that are viable for all potential developments coming forward without reducing them to a 'lowest common denominator', which would reduce overall delivery of policy objectives below capacity on many schemes. A policy approach that sets ambitious targets which may not be fully achieved in all cases is better placed to optimise delivery of policy objectives, although this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage."*

This conclusion contradicts the assertion in Policy S4 that compliance with the full policy suite should generally be assumed to be viable. The Council's own evidence instead indicates that viability outcomes will vary significantly between schemes and that a greater reliance on site-specific viability assessments is anticipated.

Of particular concern is the combined impact of Policies R1 and R2, which require developments to achieve operational net zero carbon and establish the amount of embodied carbon generated. The Viability Appraisal estimates that 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 research and development (R&D) schemes, which typically face higher construction costs and tighter operational performance specifications.

Given this evidence, Pioneer cannot be confident that the cumulative impact of the proposed policy requirements will not undermine development viability. This concern is amplified by the recent increases to the Community Infrastructure Levy (CIL) tariff for R&D uses, which further erode viability headroom at a time when development costs are already elevated.

There is a significant strategic risk that imposing an excessive viability burden on R&D development could constrain future investment in Oxford's knowledge-based economy. This outcome would run counter to the ambitions of the UK's Modern Industrial Strategy (2025), which identifies science, innovation, and high-value R&D as central to national economic growth and international competitiveness. Ensuring that Oxford remains an attractive location for R&D investment is therefore critical not only for the city's economic success but also for meeting wider national priorities.

114.3 H3 UNSOUND, b.justified, d.consistent

Policy H3: Affordable Housing Contributions from New Commercial Development

OBJECTION - Pioneer Group maintains its objection to Policy H3. While we recognise the City Council's ambition to address acute affordability challenges, the proposed mechanism - seeking affordable housing contributions from all major commercial developments (those over 1,000sqm or 1ha) - is neither supported by national policy nor underpinned by a robust evidence base. Our objection is founded on the following key points.

The Planning Practice Guidance sets out the approach that policy makers should take when considering local housing need. Housing need is the first step in reaching a housing requirement. Once the baseline is set – currently at 0.8% of existing housing stock in the Local Plan area – the second stage is to make *"an adjustment to take account of affordability".*

The PPG explains that this adjustment is applied because: *"1) housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed; and 2) people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford."*

Accordingly, the necessary adjustments to housing requirements should be considered as the first stage in setting the housing number. If additional employment growth places pressure on housing need, this should be considered, and where necessary addressed with a revised need, within the five-year review as set out at para 34 of the adopted Framework.

Further, and building upon our objection to Policy S4, it is understood that these contributions would be in addition to the recently increased CIL tariff for R&D development. While the Viability Appraisal suggests that a £10 per square metre charge represents a de minimis cost, it also estimates that, outside the city centre, this could reduce residual land values for Class E light industrial development by around 4%. The implications of this policy therefore cannot be viewed in isolation. Its viability impacts must be considered cumulatively alongside the wider package of policy requirements as identified earlier in this representation.

Finally, the Inspector's Report for the Westminster City Plan (March 2021) provides a directly relevant precedent. In that case, the Inspector recommended deleting Policy 10, which - like Policy H3 - sought affordable housing contributions from commercial developments of 1,000sqm or more. The Inspector concluded that the National Planning Policy Framework and Planning Practice Guidance only anticipate affordable housing requirements being applied to major *residential* development and make no provision for securing such contributions from commercial or any other form of non-residential development.

The Inspector also found that the policy would fail the statutory tests for planning obligations because it lacked a direct relationship to the development, provided no guarantee that funds would be spent near the contributing site, and relied on standardised tariffs that bore no relation to the actual cost of delivering affordable homes. Moreover, the proposed tariff was considered fundamentally flawed because it applied uniformly across all commercial uses despite clear evidence of differing viability profiles.

The Inspector ultimately concluded that there was insufficient justification to demonstrate that the contributions would be fairly and reasonably related in scale and kind. The parallels with Oxford's proposed Policy H3 are clear, and the Westminster highlight the policy and legal concerns with requiring affordable housing contributions from commercial development.

Policy E1 – Employment Strategy 114.4 E1 UNSOUND, b.justified

OBJECTION – Through its confusing and contradictory wording, Policy E1 risks undermining the efficient use of land that the Local Plan otherwise strongly promotes. Firstly, Policy E1 states that *outside of the city and district centres*, existing employment sites not designated as Key Employment Sites can only be regenerated for employment-generating uses where better and more intensive use is made of the site. This requirement for redevelopment and intensification is appropriate and aligns with the plan's wider objectives regarding optimisation of land and supporting economic growth.

However, the policy then goes on to state that proposals for additional floorspace for employment-generating uses on these same sites must follow the sequential approach for new town centre uses. No justification is provided for requiring a sequential assessment in circumstances where a proposal is simply seeking to intensify an existing employment site, nor are any exemptions provided for sites that are allocated for employment-related development within the Local Plan.

This creates a clear internal conflict. On the one hand, the policy requires intensification of existing employment sites. On the other, it introduces a sequential test that may prevent or delay that very intensification, even in locations expressly allocated for employment use in the Plan. For example, the intensification of employment floorspace at the Ozone Leisure Park, despite being an allocated site, would still trigger the requirement for a sequential test, introducing an unnecessary procedural hurdle that is inconsistent with the Plan's objective of maximising efficient land use.

It is therefore strongly encouraged that the wording of this policy be reconsidered to provide greater clarity and a clearer policy direction that is more conducive to the efficient use and optimisation of existing employment sites.

Policy E4: Affordable Workspaces 114.5 E4 UNSOUND, b.justified

COMMENT – Policy E4 requires development proposals delivering a net gain of 5,000 sqm GIA or more of employment-generating uses on specified sites to prepare an Affordable Workspace Strategy. However, the Local Plan provides no justification for the selected list of sites, nor does it offer a clear definition of what constitutes "affordable workspace". This lack of clarity makes it challenging for developers to understand the potential implications of this policy at the outset of site acquisition or development planning.

The Viability Appraisal models several affordable workspace scenarios. It indicates that providing 10% of floorspace at a 25% discount to market rent (in perpetuity) could reduce residual land values by around 4–6%, while a 50% discount could reduce values by 8–11%. The Appraisal further notes that "the impact may be more significant when applied to developments that are only marginally viable and a flexible approach may be required in these cases".

In the context of our broader concerns about the cumulative impact of the Local Plan's requirements, as outlined under Policy S4, Pioneer is concerned that the current drafting of Policy E4 introduces substantial uncertainty. Without a clearer indication of the level of discount sought or the proportion of floorspace likely to be required, it is difficult for developers to assess viability accurately.

Pioneer emphasises that it does not object to the principle of providing affordable workspace and recognises the potential benefits for Oxford's economic ecosystem. However, greater certainty is required regarding the scope, scale, and financial implications of the policy so that development proposals can be planned on an informed basis. Without clearer guidance, there is a risk that Policy E4 could undermine deliverability, particularly for schemes with already constrained viability or those facing multiple cumulative policy burdens, including recently increased CIL charges for R&D uses.

Policy R2: Embodied Carbon

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

114.6 R2 UNSOUND, b.justified

The principle of the policy is supported; however, we wish to suggest that further clarifications are required as it fails to balance the longer-term operational benefits of delivering more sustainable buildings, which may outweigh the carbon impact of demolition. This may impact the ability to drive innovation and deliver a more sustainable built environment in the longer term. It is suggested that this could be addressed through minor revision of wording.

Policy HD2: Making Efficient Use of Land 114.7 HD2 UNSOUND, b.justified, d.consistent

COMMENT – Pioneer Group supports the principle of maximising the efficient use of land and optimising development capacity. However, it is not considered appropriate for the policy to prescribe densities solely on the basis of broad locational categories. While we understand that the policy is intended as a guide, the appropriate density of any given site should be determined through a site-specific assessment that takes full account of its spatial context, opportunities, and constraints.

A number of other policies within the OLP2045 already serve to ensure that sites are not overdeveloped, and that potential impacts on amenity, character, and the environment are properly managed. By imposing fixed density expectations, draft Policy HD2 risks creating rigidity within the decision-making process. As drafted, it could inadvertently prevent sites from reaching their optimal capacity - ultimately reducing development efficiency, undermining the plan's own growth objectives, and conflicting with national planning policy.

National Decision-Making Policy L3 of the draft NPPF is explicit that considerations of character should *"not preclude development which makes the most of an area's potential"*, whilst L3(4) mandates refusal of proposals that fail to make efficient use of land, reinforcing the requirement for decision-makers to actively support higher densities where appropriate.

A more flexible, context-responsive approach would better reflect actual site circumstances, support efficient land use, and ensure that Oxford can continue to meet its housing, employment, and economic needs.

Policy HD6: Views and Building Heights 114.8 HD6 UNSOUND, b.justified, d.consistent

OBJECTION – 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."* As currently drafted, the policy treats **any** level of harm - regardless of scale, context, or mitigation - as automatically unacceptable. This approach conflicts with national policy and established heritage planning principles.

The adopted and draft NPPF are clear that where a proposal would cause harm to the significance of a designated heritage asset, the decision-maker must undertake a balancing exercise. Specifically, the

NPPF requires that *"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."* This test recognises that some harm may be justified where it is clearly outweighed by wider public benefits.

By contrast, Draft Policy HD6 provides no mechanism for weighing harm against benefits, nor does it allow for degrees of harm. This renders the policy more restrictive than national policy, risks inconsistency with the statutory test under the Planning (Listed Buildings and Conservation Areas) Act 1990 and could lead to unsound decision-making. It would also remove the flexibility necessary to support well-designed, strategically important development where impacts on views are limited, reversible, or capable of mitigation.

A policy that prohibits development on the basis of any level of harm - without consideration of context or benefit - risks undermining that strategic vision and could constrain opportunities for high-quality development that contributes positively to the city's evolution. Pioneer therefore considers that Draft Policy HD6 should be amended to reflect the approach in the NPPF by enabling a proportionate assessment of harm and the weighing of that harm against public benefits.

Policy C1: City, District and Local Centres

COMMENT – Draft Policy C1 outlines that '*Planning permission for retail and leisure proposals outside of a defined centre of greater than 350m^2 of floorspace, will only be granted if a retail impact assessment is submitted with proportionate evidence to demonstrate there is no negative impact on the vitality and viability of existing centres*'. 114.9 C1 UNSOUND, b.justified, d.consistent

As set out in our Regulation 18 response, Pioneer maintains that the policy wording should make clear that it applies only where there is an uplift in retail or leisure floorspace that requires planning permission.

Furthermore, the proposed 350 sq.m threshold falls significantly below the default 2,500sqm threshold set out in the NPPF. It is understood this maintains the same threshold as in the adopted Oxford Local Plan 2036, however, no up-to-date reasoning has been provided for this approach.

These matters are raised in the spirit of ongoing and constructive dialogue, and we remain keen to continue engaging constructively with the Council as the Oxford Local Plan 2045 is finalised.

Yours faithfully,

[redacted]

Jonathan Bainbridge
Partner, Planning

For and on behalf of Bidwells LLP