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OXFORD CITY COUNCIL

Oxford Local Plan 2045
Submission Draft
COMMENT FORM

Part A

You only need to fill Part A in once

Your name: David Burson

Organisation (if applicable): John Phillips Planning Consultancy (JPPC)

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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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.

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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.

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	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
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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.

JPPC
CHARTERED TOWN PLANNERS

JPPC ref: DB/6973

Planning Policy
Oxford City Council
SUBMITTED VIA E-MAIL

3rd March 2026

Dear Sir or Madam

Oxford Local Plan 2045- Pre-Submission Consultation (Reg. 19)

1. We write in response to your current consultation Oxford Local Plan 2045 Proposed Submission Draft, on behalf of the Oxford Centre for Islamic Studies (the Centre).

2. This response offers an overview of the Centre, its academic role with regard to the city and University of Oxford ('the University'), and development needs to provide context to our consultation comments. Focussed comments then follow on the proposed policies in line with the consultation regulations.

Background

3. The Centre was established in 1985 and in 1993 the former Prince of Wales became its patron. It is an institution for the advanced study of Islam and the Muslim world. Some Centre fellows discharge academic responsibilities in different faculties of the University. They and others also hold College fellowships with the attendant responsibilities for tutoring, supervising, examining, etc. The Centre's research, teaching and publication activities draw upon and contribute to the specialist expertise and excellence for which Oxford is renowned. The Centre's library linked to the University's digital catalogues, and open to its students, who are also principal beneficiaries of the Centre's seminar and lecture programmes. The Centre provides scholarships to students accepted through the University's admission procedures to read for degrees in a wide range of fields.

4. The Centre's approach to the University is oriented by, indeed specified in, the charitable purposes for which it was founded which are enshrined in the Royal Charter. It is dedicated to enabling productive encounters between the many disciplinary and cultural perspectives that specialists bring to their study of Muslim societies. Such encounters inform more constructive relationships across cultural boundaries.

Cont…

5. Over its forty years the Centre has built up an extensive network of contacts with individuals and institutions worldwide. It has welcomed visiting fellows and scholars from over 50 countries and every continent to most of whom it has provided dedicated accommodation. It has drawn many world figures to lecture in Oxford, from Nelson Mandela, Jimmy Carter and Kofi Annan to current Heads of State and Government. While enhancing both the city's reputation as a hub of international public life and international academic outreach, the Centre's activities (notably its 'young Muslim leaders' programme) contribute to better understanding, belonging and cohesion within the UK. The public service of the Centre in this regard was recognised in the award by the late Queen Elizabeth II of a Royal Charter in 2012.

6. The Centre now occupies a landmark complex of buildings set on the corner of Marston Road and Kings Mill Lane. The buildings have been widely praised for celebrating and complementing the familiar style of Oxbridge college architecture and received a building of the year award in 2017 from the Oxford Preservation Trust. Throughout the planning approval and construction phases, the Centre sought, and gratefully received, the support and good advice of local MPs, City Councillors and successive Lord/Lady Mayors. It welcomed many local visitors over the years of construction and participates actively in the Oxford Open Doors Programme. The site plays an important role in its local community; indeed, the Council have sited information boards at the Centre to publicise consultation on the emerging Local Plan.

7. In the years ahead there is great scope to use its new facilities, including a state-of-the-art exhibition gallery, to increase its outreach, especially to local schools, to enrich the diversity of cultural, educational, and intellectual life in the city. The Centre will continue to provide job opportunities at all levels as it expands its activities and generate additional economic activity through the procurement of goods and services from local suppliers.

8. The Centre is committed to financial stability, and plans for a viable, appropriate development to meet demands for student and staff accommodation, for improved technologies and equipment, for adaptiveness to the predicted further increase in the involvement of entrepreneurial interest in research activities and how these are managed for specialist and non-specialist public access. The opportunities that arise for the Centre in respect of its place and role in the life of the city as a whole, and in respect of the evolving guidelines for the city's development policy, are similar to the issues that arise for the universities and their constituent bodies. It follows that the considerations put forward in this paper would most likely be shared by the colleges and universities. However, it is important to stress that representations made to the Council herein are made by and on behalf of the Centre and no other party.

9. The Centre benefits from its interactions with the University while also contributing to Oxford's status as the world leader in many academic fields. While the city is broadly classed as prosperous, the Council is aware that some sectors of the community are excluded from this prosperity. The Council has also identified the pressing need for housing, especially affordable housing, in the city and districts; and traffic congestion, due in part to the layout of the medieval city and its rivers, but mainly to the fact that almost half of people working in the City travel into Oxford.

10. The Centre has a requirement to provide appropriate housing for its scholars and its permanent staff working in the administration or other essential, on-site support services. The City's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best,

without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.

The Centre's Sites- Old Government Buildings and Harcourt House

11. The Centre owns two sites on the eastern side of Marston Road which it intends to develop. The northern site is known as the Government Buildings Site, with the southern site occupied by and known as Harcourt House. The Government Buildings Site is previously developed land largely laid to hardstanding having previously been used as a car park. The Harcourt House site features several buildings, including Harcourt House itself a substantial office which retains a lawful use in Use Class E, confirmed by the Council through lawful development certificate 21/00284/CEU.

12. The sites are allocated for development as a single entity in the current Local Plan as site allocation SP16 which states:

    "Planning permission will be granted for residential development, student accommodation and academic institutional uses at the Government Buildings and Harcourt House site. The minimum number of homes to be delivered is 70. Other complementary uses will be considered on their merits".

13. The Centre's sites on Marston Road are (1) allocated for development, (2) adjacent, and (3) owned by a single entity (the Centre), whose main buildings are just across the road. These characteristics mean that development on the two sites can be complementary, make the most of shared space and access, favour the kind of mixed-use development urged by the City, and built to a standard that enhances the neighbourhood of the Centre's main buildings, and provides the appropriate facilities for residents to live close to their places of study and work, and to get a richer experience of Oxford academic life.

14. There is significant scope for development to make a positive contribution to the designated heritage assets in the area including the Headington Hill and St Clements, and Iffley Road Conservation Areas. Being situated just opposite, the Centre has a strong incentive to develop the sites to a standard that adds to the quality of its main buildings and their neighbourhood. The Centre needs to provide accommodation for its scholars and for academic and support staff (key workers); it also needs to use the sites for academic purposes and complementary commercial activity. Additionally, as noted earlier, there is a particularly pressing need in the city for good quality accommodation for the graduate student population. The Centre intends to develop their sites as part of its campus in a manner sensitive to its surroundings which is also economically viable.

Comments on proposed policy

Policy MRORAOF: Marston Road and Old Road Area of Focus

15. We welcome the inclusion of this policy which notes the qualities of the area and seeks positive change. We do however feel, having regard to the intention to stimulate sustainable development, the policy would be improved by modifying the description of the area removing references to 'rural' character which are inaccurate.

16. The Centre intends to provide a development upon their sites (allocation SPE3) which respects and enhances the area, including the green character of the adjoining Headington Hill Park and Cuckoo Lane. Although we feel the policy's description of the area as 'green' is representative, we do not feel the reference to 'rural' reflects its character and may hinder efficient use of land desired by the Council.

17. The area's verdant character formed by mature trees and parkland in the vicinity part of the patchwork of the city, rather than countryside. This is particularly so in the context of the redevelopment of Oxford Brookes' student accommodation adjacent to Cuckoo Lane (ref. 21/01185/FUL) which features blocks up to six storeys in height.

18. We believe the reference to a rural character should be omitted to ensure development policies in this area are effective and the plan is sound. This change will not undermine the purpose of the policy or desire to maintain the green character but will remove a potential barrier to beneficial development.

Policy SPE3: Government Buildings and Harcourt House

19. The Centre maintains its desire to develop its sites on Marston Road (Government Buildings and Harcourt House) to improve and expand the facilities of its existing campus. It welcomes the inclusion of its site as an allocation for development in the Area of Focus.

20. We support the draft policy's retention of uses set allowed by current Local Plan policy SP16, namely residential development, student accommodation, academic institutional uses, and other complementary uses which will be considered on their merits. This schedule was established after thorough consideration and examination; there is no good reason it should be changed. The Centre have undertaken positive discussions with the City Council and have advanced development proposals based on current policy.

21. The Centre intends to include commercial research and development space within a site redevelopment, in partnership with colleagues in the academic environment, to complement academic research. These activities would be 'spin out' application of academic research in economic, human, scientific, and technological fields as is the norm in the modern academic arena owing to obvious benefits from the co-location of cutting-edge research and its commercial application.

22. The Centre appreciates the importance of strengthening links with the green space around the site through development and intends to do so. Having regard to the site's position to the edge of the park and spanning Cuckoo Lane the most meaningful contribution to green space is likely to be through improved connections to these green areas, rather than arbitrary provision of additional public open space within the site. This was acknowledged by the Inspector during examination of the current Local Plan who required removal of a mandatory requirement of on-site green space from the draft site allocation policy.

23. Other development management policies require provision of green space and so adequately address the issue while retaining flexibility to ensure the best solution for the area is secured. Hence reference to public open space should be omitted from site allocation policy SPE3. Removal of this reference would not threaten the soundness of the policy but would improve its effectiveness.

Design requirements

24. The draft policy includes detailed commentary on expectations of a development. This results in a lengthy policy. Commentary provided in SPE3 in the main replicates matters covered in draft development management policies in the Plan.

25. The extensive additional commentary in SPE3 is at the expense of clarity and undermines its soundness. It is more akin to guidance and would be better expressed

as such, supplementing a concise allocation policy. The separation of guidance and policy would also be beneficial in differentiating requirements that are likely to be strictly interpreted, and points which are made to guide development proposals.

26. We believe the above suggested changes are important to future application of the policy and progression of development proposals on the allocated site, thus they are needed to ensure the Local Plan is sound.

Policies S1: Presumption in favour of sustainable development, and S4: Plan Viability

27. We welcome the inclusion of draft policy S4 which acknowledges the need for pragmatism in decision making where development of a site is not financially viable.

28. The draft Local Plan seeks to introduce a raft of new requirements for development including regarding building performance and ecology. While these are clearly important matters they must be considered within the economic realities of development.

29. This is particularly pertinent for sites such as the Centre's campus sites on Marston Road which are longstanding allocations. The introduction of additional requirements on sites which have longstanding viability challenges is likely to hinder their development. Clearly it is a poor outcome for sustainable development for well-located sites to remain dormant. Inclusion of the policy is critical to the Local Plan being found sound.

30. Similarly, a positive approach to planning applications, in line with the presumption in favour of sustainable development, will be essential to delivery of development particularly on allocated sites.

Policy H3- Affordable housing from student accommodation

31. We welcome modification of this policy following your Preferred Options consultation to retain exemption from the requirement for developments within existing and proposed university or college campus sites which is in the current Local Plan (policy H2).

32. For the avoidance of doubt, we are clear the exemption must, and as drafted does, include the Centre's sites on Marston Road (allocated under SPE3) retaining the exemption afforded under current Local Plan policy H2. This exemption was introduced at examination as without it campus developments, including the Centre's, which are critical to delivery of the Local Plan would not be viable. Delivery of student accommodation is integral to the development of academic and institutional facilities (under draft policy H9) which is fundamental to the economic vision of the Plan.

33. The exemption for campus developments is provided for very good reasons. Financial considerations for campus developments are very different to those for standalone student accommodation schemes undertaken by commercial developers. Student accommodation provided as part of campus developments by institutions, including the Centre, is often only marginally viable given the higher build costs in providing the necessary quality of building and the responsibility to provide high quality accommodation to its students at a reasonable rent. The costs and likely returns on development are quite different from commercial student accommodation schemes which have flexibility in location, design, and end rents.

34. The exemption afforded to campus developments from contributions to affordable housing is critical to the soundness of the Local Plan.

Policy H4- Employer Linked Affordable Housing

35. Policy which allows for homes which are affordable to be provided by key employers is positive and can help stimulate essential development, particularly on sites with a longstanding allocation which has not progressed. Employers in the city have long expressed the difficulty presented by the housing crisis, they therefore have an obvious interest in ensuring any homes provided are genuinely affordable to their workers. Increased ability for employers to provide homes for workers close to their place of work would also support the emerging Local Plan's increased emphasis on reducing need for people to travel.

36. The Council are aware of the Centre's longstanding aspiration to develop its campus sites on the Marston Road. Within the campus development it is hoped to provide homes for the Centre's staff. We believe the Centre's site should be one on which policy allows for employer linked affordable housing.

37. The Centre has a need and duty to provide affordable housing for its permanent staff working in the teaching, administration, or other essential, on-site support services. The city's restricted housing market and extremely high house prices make it very difficult to recruit and retain essential staff. The same is true for early career academics who are forced to turn down positions because they cannot afford Oxford rents. This problem must be addressed if the city is to attract the brightest and best, without whom it will be difficult to hold on to its reputation as a world leader in scholarship, which in turn impacts the surrounding economy.

38. We consider the site, which is to be developed as part of the Centre's campus on Marston Road should be included as a benefitting site under policy H4. This will improve the likelihood of delivery of development on the site, benefitting effectiveness of the Plan, and so soundness.

Conclusion

39. We are grateful for the opportunity to comment on the Local Plan and trust these comments will be considered. We would be pleased to elaborate upon any of the matters raised and wish to be notified of, and participate in, any further consultation or examination into the submitted documents.

40. We wish to be notified when the Council submit the Local Plan 2045 to the Government for examination, when the Inspector's Report is published, and when the document is adopted by the Council. We also confirm we wish to speak at any examination into the Local Plan.

Yours faithfully,



David Burson LLB MSc. MRTPI
Associate
email: [redacted]
direct dial [redacted]