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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: C/O Agent Guy Wakefield (Ridge and Partners LLP)

Organisation (if applicable): Ellison Oxford Limited

Address: [redacted]

[redacted]

[redacted]

Email: [redacted]

Date: 13/03/2026

Data protection:
Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☐ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☒ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	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?	◉	○

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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

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- 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	R1	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.

Our concern is whether the significant costs of infrastructure upgrades, build costs, a request for affordable workspace, a significant increase in the community infrastructure levy ('CIL') levy for research and development buildings, and other section 106 related costs have been taken into consideration in determining the viability of the development being promoted through the Local Plan? For further justification, please refer to the accompanying written representation.

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.

In order to make the emerging Local Plan compliant with national policy and therefore sound, it is necessary that the Council undertake a robust assessment demonstrating that the significant costs of infrastructure upgrades, build costs, a request for affordable workspace, a significant increase in the community infrastructure levy ('CIL') levy for research and development buildings, and other section 106 related costs have been taken into consideration in determining the viability of the development being promoted through the Local Plan?

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This is the end of the comment form

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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	E4	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.

The requirement for employment development over a certain threshold at specific sites to produce an affordable workspace strategy is not supported in national policy, including neither the National Planning Policy Framework nor the Planning Practice Guidance. For further justification, please refer to the accompanying written representation.

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.

In order to make the emerging Local Plan compliant with national policy and therefore sound, it is strongly recommended that draft Policy E4 is removed entirely from the Plan.

Please use an extra sheet if completing a paper copy.

This is the end of the comment form



RIDGE

REPRESENTATIONS TO OXFORD CITY COUNCIL'S OXFORD LOCAL PLAN 2025 DRAFT PROPOSED SUBMISSION PLAN ON BEHALF OF ELLISON OXFORD LIMITED

March 2026

REPRESENTATIONS TO OXFORD CITY COUNCIL'S OXFORD LOCAL PLAN 2045 DRAFT PROPOSED SUBMISSION PLAN MARCH 2026

Prepared for

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1. INTRODUCTION

1.1. These representations are made on behalf of our client, Ellison Oxford Limited (hereafter referred to as 'the client' or 'EIT'), in response to the consultation on Oxford City Council's ('OCCs') Oxford Local Plan 2045 Submission Draft (Regulation 19) which is running between the 30th January 2026 and 13th March 2026.

1.2. An early engagement survey was conducted in March and April 2025 to assess the extent to which the public and businesses deem certain topics to be important for the emerging Local Plan to influence and prioritise.

1.3. Subsequently, consultation on the Local Plan Preferred Options (Regulation 18) ran from the 27th June to the 8th August 2025. The purpose of this consultation was to ascertain views on the draft policies identified as preferred options and this has informed the development of the draft Proposed Submission Plan.

1.4. This representation is therefore made in response to the draft Proposed Submission Plan. The purpose of this consultation is to determine whether or not the Plan meets the criteria for being sound and legally compliant. The tests of soundness for the Proposed Submission Plan include, amongst other factors, whether it is justified, based on proportionate evidence, and whether it is consistent with national policy.

1.5. It should be noted that these representations are made within the context of EIT's land interests at Oxford Science Park, Littlemore.

2. CURRENT POLICY CONTEXT

2.1 In terms of current local policy, the adopted development plan comprises the Oxford Local Plan which was adopted in June 2020.

2.2 The current key policies relevant to the site are outlined below.

Cotswold District Local Plan (2011-2031)

2.3 The Local Plan was adopted in August 2018 and covers the period up to 2031. It provides the spatial strategy for the district.

2.4 **Policy E1** states the following:

> *"Planning permission will be granted for the intensification, modernisation and regeneration for employment purposes of any employment site if it can be demonstrated that the development makes the best and most efficient use of land and does not cause unacceptable environmental impacts and effects."*

2.5 **Policy AOC7:** Cowley Branch Line identifies that planning permission will be granted for new development within the area of change where it would take opportunities to deliver the following, where relevant:

- *"To enhance existing tree cover and semi-rural landscape;*
- *To retain wildlife corridor function of the brooks;*
- *To safeguard land for proposed stations and access;*
- *To make more efficient use of space through intensification of existing sites; and*
    - *rationalisation of parking and reduction in surface-level car parking;*
    - *Improved connectivity between different parts of the area."*

2.6 In addition, **Policy SP9** states that:

> *"Planning permission will be granted for B1 employment uses that directly relate to Oxford's key sectors of research led employment at The Oxford Science Park."*

2.7 Policy SP9 goes on to state that *"development should be designed to enhance the external appearance of the science park and to optimise opportunities to enhance the landscape and provide attractive public open space for the occupants. The reopening of the Cowley Branchline will provide a realistic alternative to the private car for gaining access to the science park. Opportunities should*

be sought to enhance and promote more sustainable travel to and from the park. A buffer should be retained along the railway corridor to allow for the movement of the protected species. Development should not have an adverse impact upon the wildlife corridor or any archaeological remains."

2.8 Finally, **Policy SP44** states:

> *"Planning permission will be granted for employment (B1) and complementary appropriate uses at Littlemore Park. Residential development is a suitable alternative use but to ensure that there is no loss of employment sites within Oxford, planning permission will only be granted for residential development on Littlemore Park provided that an equivalent amount of new B1 employment (employees) is created elsewhere within Oxford. The minimum number of homes to be delivered is 270. Other complementary uses will be considered on their merits."*

3. RESPONSE TO THE DRAFT PROPOSED SUBMISSION PLAN

3.1 The Preferred Options Consultation Document sets out the Council's proposed development strategy for the district as well as the preferred options for development following the previous Regulation 18 Issues and Options Consultation in 2022.

Policy SPS12: Oxford Science Park

3.2 Draft Policy SPS12 states:

> *"Planning permission will be granted at Oxford Science Park for development of research and development and office employment uses (Class E) that directly relate to Oxford's key sectors of research-led employment. Other complementary uses will be considered on their merits."*

3.3 EIT are largely supportive of the draft allocation of Oxford Science Park for the development of research and development and office employment uses (Class E). This draft allocation represents a continuation of the existing allocation of the Science Park under Policy SP9 of the adopted Local Plan, as set out previously in Section 2 of this document.

3.4 EIT was established by Oracle founder Larry Ellison and is led by a world-class faculty of scientists, technologists, engineers, researchers, educators and innovators. EIT's mission is to deliver scaled solutions to humanity's important problems, with a focus on four endeavours:

- Health, Medical Science & Generative Biology
- Food Security & Sustainable Agriculture
- Climate Change & Managing Atmospheric CO2
- Artificial Intelligence ('AI') & Robotics.

3.5 Across these endeavours, EIT are mapping out the expansive and complex interconnected sets of problems spanning technology, economics and many different scientific disciplines. Their programs and platforms work in synergy to tackle the whole challenge, not just one part of it.

3.6 In light of this, it is EIT's intention to progress with their masterplan for a new campus, redeveloping the Oxford Science Park via the delivery of a suite of state-of-the-art research and development buildings and associated office employment spaces.

3.7 However, we recommend some minor amendments to the draft policy text to ensure that the draft allocation, if it were to be adopted, can be delivered in full accordance with the policy. Table 1 below illustrates the recommended amendments to the draft policy text.

Location in Draft Policy Text	Current Text Wording	Proposed Text Wording	Justification for Proposed Amendment
Open space, nature flood risk: Paragraph d)	"A 10-metre buffer to the Brook should be maintained […]"	"With the exception of new footbridges to improve connectivity, a 10-metre buffer to the Brook should be maintained […]"	To facilitate the necessary delivery of new footbridges across the Brook to improve permeability from the Science Park to, for example, Littlemore House.
Open space, nature flood risk: Paragraph e)	"Parts of the site are Flood Zone 3b, mainly along the Brook, and a sequential approach should be taken to locating development on the site […]"	"Parts of the site are Flood Zone 3b, mainly along the Brook, and, with the exception of new footbridges across the Brook, a sequential approach should be taken to locating development on the site […]"	To facilitate the necessary delivery of new footbridges across the Brook to improve permeability from the Science Park to the rest of Littlemore.
Urban design & heritage: Paragraph g)	"Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new public open spaces."	"Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new open spaces."	Given the nature of EIT's intended use of the Science Park, it would not be appropriate in security terms to have areas of open space which are accessible to the public.

Table 1 – Proposed amendments to draft policy SPS12

Policy R1: Net Zero Buildings in Operation

3.8 Policy R1 requires new building to be 'net zero carbon in operation'. The Council's aspirations are on the one hand, commended; paragraph 163 of the NPPF states:

> *"The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts."*

3.9 Paragraph 164b states:

> *"b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.*

3.10 The Council should be able to demonstrate that the Local Plan's aspirations do reflect the Government's policy for national technical standards.

3.11 Paragraph 166 states:

> *"In determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and"*

3.12 Our concern is whether the significant costs of infrastructure upgrades, build costs, a request for affordable workspace, a significant increase in the community infrastructure levy ('CIL') levy for research and development buildings, and other section 106 related costs have been taken into consideration in determining the viability of the development being promoted through the Local Plan?

Policy E4: Affordable Workspaces

3.13 Draft Policy E4 states:

> *"Development proposals delivering 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) on the following sites are expected to produce an affordable workspace strategy:*
>
> *a) ARC Oxford*
>
> *b) Oxford Science Park […]"*

3.14 EIT are not supportive of this draft policy, requiring the redevelopment of the Science Park to deliver affordable workspace, for numerous reasons.

3.15 Firstly, this requirement is not supported by anything in national policy, neither the National Planning Policy Framework nor Planning Practice Guidance.

3.16 Moreover, following a review of the Council's evidence base, it is considered that there is nothing to suggest that such a scheme, incorporating an affordable workspace strategy, could be viable. In addition, the Council has failed to demonstrate any assessment or consideration of the potential cumulative impact of an affordable workspace strategy alongside CIL liability and other planning obligations on the viability of such schemes.

3.17 Conversely, it is considered that such an onerous requirement would serve to frustrate schemes from coming forward that would otherwise bring significant economic and social benefits to the local community, including the provision of new employment opportunities for local people.

3.18 It is therefore EIT's position to not support this draft policy unless the Council is able to demonstrate a robust assessment of the impact of an affordable workspace strategy on a scheme's viability and which concludes positively.

4. CONCLUSION

4.1. This representation has been prepared by Ridge and Partners LLP on behalf of our client, Ellison Oxford Limited, in response to the consultation on Oxford City Council's ('OCCs') Oxford Local Plan 2024 Draft Proposed Submission Plan consultation which is running between the 30th January 2026 and 13th March 2026.

4.2. As set out above, EIT are largely supportive of draft policy SPS12 which represents a continuation of the existing adopted employment allocation (ref: SP9) of the Oxford Science Park. It is our client's intention to redevelop the Park in line with the uses and parameters set out in the draft policy.

4.3. However, it is recommended that some minor amendments are made to the draft policy text to ensure that EIT's vision for the site can be delivered in full accordance with any future allocation that may be adopted as part of the new Local Plan. The details of these changes and associated justifications are provided in Table 1 above.

3.19 In addition, in response to draft policy R1, the query has been raised as to whether consideration has been given to the impact of the significant costs of infrastructure upgrades, build costs, a request for affordable workspace, a significant increase in the CIL levy for research and development buildings, and other section 106 related costs in determining the viability of the development being promoted through the Local Plan.

4.4. Moreover, it has been outlined in Section 3 that EIT are not supportive of draft Policy E4, which seeks to require schemes over a certain threshold at the Science Park to incorporate an affordable workspace strategy. It is not considered that this draft policy is supported by neither national planning policy nor the Council's evidence base and it does therefore not represent a sound policy.

4.5. Overall, EIT are mostly supportive of the draft Proposed Submission Plan and respectfully request that the above comments are taken into consideration.

RIDGE

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