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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: Ben Tattersall - Planning Agent on behalf of The Oxford Science Park

Organisation (if applicable): The Oxford Science Park Partners Ltd

Address: [redacted]

Email: [redacted]

Date: 13/03/2026

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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)	○	◉
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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.

13 March 2026

Planning Policy
Oxford City Council
Town Hall
St Aldates
Oxford
OX1 1BX

By Email: planningpolicy@oxford.gov.uk

Ben Tattersall
[redacted]

Dear Sir / Madam

OXFORD LOCAL PLAN 2045 REGULATION 19 CONSULTATION: SUBMISSION DRAFT LOCAL PLAN

Savills is instructed by The Oxford Science Park Partners Ltd (hereafter referred to as "TOSP") to submit representations in respect of the Oxford Local Plan 2045 Regulation 19 Consultation: Submission Draft (January 2026). This letter builds on previous representations by TOSP to the Regulation 18 consultation for the Oxford Local Plan 2042 and the Oxford Local Plan 2040, which was withdrawn from examination following the Inspector's recommendations, and provides background and contextual information about The Oxford Science Park, before setting out our client's representations.

Background and Context

The Oxford Science Park is designated as a Category 1 Employment Site and is an allocated site under Policy SP9 of the Oxford Local Plan 2036. It is home to circa 100 emerging life science companies and is the HQ of two of Oxford's most successful businesses, Novo Nordisk and Oxford Nanopore. In 2025, the western side of the Park was sold to the Ellison Institute of Technology (EIT) to enable a significant capital investment to expand EIT's Oxford Campus. TOSP retains the eastern portion of the Park where companies are growing rapidly and require significant additional research-led employment space.

Much of the demand for laboratory and office space and attraction to Oxford is fuelled by the reputation of Oxford's academic institutions and its contributions to addressing global healthcare, technological and sustainability challenges, including fighting the COVID-19 pandemic. This demand is steadily growing and, whilst there has been significant investment from existing and new companies, as well not-for-profits such as EIT, continued supply of research and development stock is required to meet this demand and ensure the objectives of the Industrial Strategy (2025) to bolster growth in the life science, healthcare and technology sectors are met. Failure to meet this demand quickly enough can not only mean lost opportunity in accommodating new startups and established international R&D businesses, but also the loss of existing growing companies to other UK clusters and even other countries. The Oxford Science Park is key to Oxford's meeting this demand.

Planning permission was granted in 2021 for Plot 16, which will deliver a total of 19,030 sqm (GIA) of R&D floorspace (application ref: 19/02003/FUL), with Phase A now complete (also known as the Iversen Building). Phase B (also known as the Leggett Building) is the next development to be delivered by TOSP and will start construction in the next couple of years. Planning permission was granted in August 2025 for Plot 27, which proposes 9,306sqm of laboratory and office floorspace (application ref: 22/02555/FUL). Once the abovementioned planning permissions are implemented, there will be no remaining undeveloped plots within TOSP and additional floorspace will be sought through intensification of existing brownfield plots to meet growing demand for R&D floorspace in the city, which will be required for life science, healthcare and technology occupiers.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Paragraph 86 of the National Planning Policy Framework (2024) sets out planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy. The Industrial Strategy, published in June 2025, sets out a new economic approach to backing the UK's strengths, with ambitious plans to drive growth for 8 sectors identified as the highest growth opportunities for the economy and business, which includes the life science and technology sectors. The Industrial Strategy sets out a key aim to ensure that the planning framework supports growth in the eight priority sectors. It is considered that the Oxford Local Plan 2045 presents a significant opportunity to set out a clear economic vision and strategy which positively and proactively encourages continued growth and intensification of research and development uses to maintain Oxford's position as a regionally and globally significant life science cluster.

In general, TOSP is supportive of the content and overall direction of the draft Local Plan. Notwithstanding this broad support, we set out below a number of comments for consideration. These representations are submitted in a constructive spirit, with the objective of ensuring that the Local Plan has the best possible prospect of being found sound at the forthcoming Local Plan Examination.

Chapter 1 – Introduction and Strategy

TOSP support the vision to provide a healthy and inclusive City with strong communities that benefit from equal opportunities for everyone, not only in access to housing, but to nature, employment, social and leisure opportunities and to healthcare. The vision is one which supports research and development in the life sciences and health sectors which will continue to provide solutions to global challenges. The overarching threads of the Plan are acknowledged including the need to address climate change, reducing inequalities and the creation of a liveable city.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
S4: Plan Viability	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

The policy 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. While TOSP agree with the Council that developers are expected to have considered the financial implications of policy requirements in the City, such as affordable housing or net zero carbon, and local market indicators, when purchasing land for development, TOSP are concerned that the cumulative policy cost has not been sufficiently considered and creates unfavourable conditions for future investment in the City.

Proposed policies will add cost and uncertainty to the planning process, as well as substantial cost to the construction of new developments and refurbishments. The Local Plan should not put in place policies that fetter development opportunities from being brought forward or that mean those tasked with major development investment decisions must operate at the margins of viability.

Following recent experience, rapid economic changes such as the recent pandemic, conflicts in Ukraine, Iran, and the wider Middle East and increases in interest rates can have a significant and long-lasting market impact. Furthermore, sector specific challenges, including general funding and limitations in Government grants, provide further challenges on the life science and technology sectors. It is important that the viability of the development plan is therefore resilient, and that the viability work supports this. The overarching concern is that proposed employment uses would be materially affected by the cumulative cost of proposed policies. This

is in addition to amendments to the City's CIL Charging Schedule adopted in mid-August – which resulted in a fivefold increase for R&D uses from £33.74 psm to £172.28 psm.

Those increased costs will ultimately be reflected in rents charged to occupiers. Increasing the cost of occupation for these companies, on top of tax rises including National Insurance and Business Rates, will reduce the funding available for their research and development activities and risks driving many away from Oxford to more competitive locations both within the UK and abroad. That would have a profound and potentially irreversible impact on Oxford's position as a leading centre for innovation.

While TOSP do welcome the mechanism introduced under Policy S4 for net zero and/or affordable housing contributions to be reduced or removed entirely from employment-generating uses via a viability cascade, this very process adds further cost and uncertainty to the planning process. These comments are also made notwithstanding TOSP's separate comments on net zero and/or affordable housing policies set out further in this letter.

TOSP requests that the viability assessment prepared by BNP Paribas is robustly reviewed and the Council robustly considers the cumulative policy cost to ensure Oxford remains a favourable and attractive place to invest, without operating in the margins of viability.

Chapter 2 - A Healthy and Inclusive City to Live in

This chapter sets out the strategy to deliver new housing for the City and to provide for all types of household needs and circumstances, including families, single people, the elderly and those with special needs. TOSP recognises that Oxford has acute housing pressures that need to be addressed, both in terms of overall supply and affordability.

Policy H1 (Housing Requirement) sets out the Plan's provision to provide at least 9,267 new homes to be built in Oxford over the plan period 2025-2045 (average of 463 per annum). This will be from a mixture of site allocations, promoting efficient use of land and allowing an element of housing on all employment sites if suitable.

The standard method housing need calculation for Oxford City calculated in December 2024 is 1,087 dwellings per year. Therefore, the Plan does not fulfil the full housing need identified under the Standard Method and the Council sets out they are unable to meet their housing need within the City alone.

TOSP supports the Council's ambition to maximise housing delivery in the City and encourages the Council to fulfil its obligation to meet its housing need. TOSP strongly supports the allocation and optimisation of key surrounding sites, including Kassam Stadium (Policy SPS7) and the overflow car park at Kassam Stadium (Policy SPS11), for residential-led development. These complement existing allocations within South Oxfordshire District Council's control, principally South Oxfordshire Science Village to the south of Grenoble Road. This will encourage the delivery of new market and affordable housing in close proximity to existing and future employment opportunities at the Park, particularly given the strong development pipeline, encouraging mixed, sustainable neighbourhoods.

Noting the above, TOSP objects to Policy H3 (Affordable Housing Contributions from other development types) for the reasons set out below.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:	
H3: Affordable Housing Contributions from Other Development Types	Yes	No	Object	Positively Prepared	X
				Justified	X
				Effective	X
				Consistent with National Policy	X

TOSP recognises the need for affordable housing delivery in the City, particularly due to the high costs of housing, and the inability of the Council to address its housing need within the City alone. Whilst it is important to meet this need, TOSP objects to Policy H3 (Parts (e) and (f)) in relation to the Council's approach to seeking affordable housing financial contributions from new commercial development (i.e. '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').

Major commercial developments already deliver significant financial contributions towards delivery of infrastructure, highways improvements and public transport improvements, including towards the delivery of the Cowley Branch Line. The Council will be aware of the substantial support TOSP is providing to the Council to obtain funding for CBL. These activities are already taking place outside of planning conditions/obligations attached to specific developments and most recently as part of planning applications, with a financial contribution towards delivery of the CBL secured as part of the planning permission for Plot 27. These contributions are directly related to major commercial developments and recognised by TOSP as necessary to ensure the impacts of commercial development in the City are mitigated.

We are concerned the requirement for a further financial contribution towards affordable housing would further increase the cumulative policy cost and create an unfavourable environment for economic investment in the City. This would undermine the deliverability of the plan's economic objectives through rendering investing in the City unfavourable and unviable, particularly in a competitive global marketplace where economic investment in the R&D sector can be uprooted and taken elsewhere with more favourable planning and market conditions.

The NPPF and NPPG only make reference to seeking affordable housing from major residential developments. There are no references to affordable housing contributions or provision being made from commercial development. There is no certainty that planning obligations under this policy will actually deliver affordable housing in the City as the City has confirmed it is unable to meet its housing need figure. There is no ability to ring fence the obligations to the identified workers being generated from commercial developments, or even if those workers would qualify for affordable housing. In fact, the background paper on affordable housing (reference BGP-002 Affordable Housing Reg 19) prepared by the Council states that: "*Whilst the housing would not necessarily go directly to the staff of the development site, it would generally help supply of affordable housing*".

The policy relies on a high-level assumption that employment development will generate a need for affordable housing with no evidence that it will create this need and no reference to market housing need. The level of contribution is an arbitrary figure and has not been sufficiently demonstrated to be at a level to mitigate any identified need or impact. It also assumes that employees will live in Oxford, rather than more affordable locations in the surrounding Districts or further afield.

The policy also assumes that all new commercial development will generate entirely new jobs for the City and fails to take into account companies moving from one part of Oxford to another and where the old premises are no longer fit for purpose or are being redeveloped for alternative uses, such as housing – where no additional need will be generated. For instance, Novo Nordisk is relocating from the Innovation Building in Headington to the Iversen Building at TOSP, which is the latest major development to be delivered at TOSP. The policy

assumes all jobs will be newly created which is rarely the case in major commercial developments and evidenced by this specific example at TOSP.

In summary, we consider that seeking such a contribution would not meet the three tests for planning obligations set out under Regulation 122 of the CIL Regulations and Paragraph 58 of the NPPF as the obligation is not necessary to make commercial developments acceptable in planning terms and not directly related to the development. Employment development would be supported by other policies in the Plan and such a contribution is not needed to make the development acceptable in planning terms. We appreciate that such an obligation would enable significant sums of money to be collected for affordable housing. However attractive that proposition may be, the fact that a policy will generate substantial financial contributions is not in itself a reason to include it in a development plan and does not mean the policy is justified or meets the tests of Regulation 122.

We would also like to note that a similar policy was proposed in the Westminster City Plan 2019-2040, which was examined in 2020. That policy (Policy 10 of the Submission Draft) included a requirement for contributions from certain commercial developments (as defined in that policy). The Inspector's recommended that the Policy be removed (which it was in the Adopted Plan). In coming to their conclusion, the Inspector's noted that the policy requirement "*would simply require financial contributions to the City-wide Affordable Housing Fund. It would not achieve the key objective of the submitted Policy 10*" (paragraph 85) to ensure mixed, inclusive and cohesive communities.

TOSP has no comments on aspects of Policy H3 relating to seeking affordable housing contributions from new purpose-built student accommodation and from self-contained older persons accommodation.

Suggested Amendment to Policy H3: Affordable Housing Contributions from Other Development Types
Policy H3 should be amended to take account of the following changes: First Paragraph: Delete references to "*and new employment-generating uses*". Parts (e) and (f): Delete these requirements.

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

The chapter recognises the global reputation of Oxford in terms of economic assets and innovation. The City is characterised by the presence of the two universities and teaching hospitals and this provides an attractive location for a range of companies which include medical research and life science sectors, which is reflected in the significant investment in the City to date. This results in a number of 'spin-out' businesses due to the availability of graduates. The policies in this chapter seek to maintain the vitality of the employment industry but noting that this needs to be balanced in the context of the competing demands for meeting the needs for housing in Oxford. This is recognised by TOSP as a key issue for the City and development proposals within it.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
E1: Employment Strategy	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

Policy E1 sets out an employment strategy for the City supporting intensification and modernisation of any Key Employment Site or any employment site in the city centre or district centre. TOSP supports this approach to meet the Cities employment needs, while preventing employment uses on non-designated employment sites to balance other uses, in particular housing.

We consider that designated employment sites, such as TOSP, are the best locations to support intensification of employment uses to meet employment needs.

TOSP has no plans at this time to deliver housing on-site, but recognises housing is a key locational consideration for companies. Therefore, TOSP recognises and supports the scope for allowing some housing on employment sites provided it supports their economic function as part of Policy E1.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is <u>not</u>:
E4: Affordable Workspace	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

TOSP welcomes the revisions made to the affordable workspace policy to now require only commercial development over 5,000 sq.m. to produce an affordable workspace strategy (AWS), rather than require a specific percentage of floorspace to be delivered for affordable workspace across all major applications. This will enable greater flexibility and deliver solutions better suited to different sites and local needs.

Flexibility in the application of AWSs is essential to ensure that TOSP has complete flexibility to determine rents and the terms provided for space on the Park, so it can respond to market conditions and meet tenant and occupier needs. One of the key differentiators of a science park from business parks and other forms of commercial development, is the focus on establishing an ecosystem and being able to provide a range of floorspace on differing terms designed to meet the needs of businesses ranging from spinouts and start-ups to mature businesses.

TOSP is recognised for successfully achieving this and which distinguishes it from being a standard "commercial site." The Oxford Science Park has 'The Magdalen Centre' which provide one of the largest innovation centres in Europe. Innovation space accounts for 138,000 sq.ft. of the 590,000 sq.ft. of existing floorspace across the entire site allocation, which will increase by 380,000 sq.ft once The Daubeny Project is delivered by EIT. Over the past 35 years, TOSP has developed a successful business model and science ecosystem to offer a full range of units to occupiers to enable businesses to take up flexible, affordable workspace to then graduate through to larger spaces as their needs grow within the Park.

AWSs are defined in the glossary of the local plan as a strategy which sets out the details of the affordable workspace to be delivered on site which will include details of the size, marketing, servicing, management and how the space provided will meet end-user requirements.

It remains unclear what type and level of detail will be considered acceptable in respect to the size, marketing, servicing and management for affordable workspace and what rental models will be adopted. In addition, it is unclear which companies would qualify for affordable workspace, particularly at SME level, and what percentage of floorspace would be expected to be delivered as affordable. Clarification on these matters is critical to understand how the policy will operate in practice and the cost of the policy on future developments.

It is acknowledged that the Council intends to prepare a Technical Advice Note (TAN) that expands on various aspects of the policy (including advice on how to prepare an affordable workspace strategy, implementation of

the policy and monitoring) to support the delivery of the policy. It is requested the affordable workspace definition contained in the glossary of the local plan is amended to provide greater clarity on what constitutes start-up and early-stage businesses or introduce a new definition for SMEs to enable greater clarity on who would qualify for affordable workspace.

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

Chapter 4 seeks to ensure that new development is adapted to climate change and does not impede Oxford's future resilience to climate change threats and sets out policies to enhance the Cities network of green and blue infrastructure.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:	
G3: Provision of New Green and Blue Features – Urban Greening Factor	Yes	No	Object	Positively Prepared	
				Justified	x
				Effective	
				Consistent with National Policy	

Policy G3 seeks to introduce minimum urban greening factor (UGF) scoring that needs to be demonstrated for major development proposals. The NPPF states that Local Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 188) and local planning authorities should take opportunities to improve biodiversity when assessing individual applications (paragraph 193). UGF is used in The London Plan and in other major cities across Europe, but there is no evidence that its use is justified in Oxford. It is considered that the incorporation of policy G3 will result in an unnecessary additional policy hurdle and achieving net gains in biodiversity and enhancing networks of habitats and green infrastructure as required under the NPPF, Policy G4 and Environment Act 2021 can be sufficiently achieved under existing policy requirements, which in turn will result in urban greening. It is requested that this policy be deleted as it is not justified as it will duplicate policy requirements which deliver the same outcomes.

Chapter 5 – A City that Utilises its Resources with Care, Protects the Air, Water, and Soil, and Aims for Net Zero Carbon

Chapter five of the Local Plan primarily relates to the use of resources and carbon emissions. TOSP acknowledge that the Council has declared a 'Climate Emergency' and are committed to providing sustainable development. In relation to the specific policies set out in the draft plan the comments below are provided.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:	
R1: Net Zero Buildings in Operation	Yes	No	Object	Positively Prepared	
				Justified	X
				Effective	X
				Consistent with National Policy	

Policy R1 sets out the requirements to ensure all new buildings should be net zero carbon in operation. While TOSP welcomes the policy wording being revised to enable higher EUI targets for non-residential uses with

exceptionally high energy demands, including R&D/labs/hospitals, TOSP remains concerned in respect to this policy.

As set out in previous representations, laboratory buildings typically require a significant amount of mechanical ventilation and air changes to maintain an appropriate containment level and environment, resulting in their power demand to be typically 4-5 times more than that for a standard office building and can be even higher for more specialised requirements.

It is also noted that laboratory buildings have a full spectrum of specifications to meet the research needs of its occupants. This makes predicting EUIT targets for R&D buildings particularly challenging due to the speculative nature of the developments. As most R&D developments in the City are speculative developments developed to shell and core, this presents a further challenge for assessing EUITs for these buildings as the type of science and proportion of laboratory space will heavily dictate the buildings energy consumption, where research requirements inform ventilation strategies and equipment. Therefore, there may be differences between the predicted EUIT and the operational EUIT as the type of research required from occupiers will ultimately dictate energy consumption. Therefore, flexibility is essential to account for 'performance gaps' between the predictive model and operation. We are concerned that the current policy will result in EUIT targets being set which do not enable flexibility in building operations to encourage innovation.

TOSP specifically objects to requiring all energy needs to be met through onsite renewable energy generating technologies in the first instance, accompanied by energy storage and then seeking to meet the remaining energy balance through installation of sufficient additional renewable generation at a location offsite. While this aspiration is recognised, this is not effective in practice.

Given the high energy needs for lab buildings, it is wholly unrealistic for all energy needs for lab buildings to be met on site through renewable energy, as demonstrated by all R&D developments coming forward in the City to date. Integration of energy storage could conflict with the effective use of land for employment needs and is arguably incompatible with high quality design and placemaking requirements required from other policies in the Plan, largely due to the space and design requirements for energy storage, such as battery energy storage. This could detract from the overall design aims of employment sites and the surrounding areas.

Given the constrained land available for development in the City, which the Council recognises in their inability to meet their full housing need, it is also wholly unrealistic to deliver additional renewable energy generation at a location offsite, particularly with the local plan not identifying any site allocations for the purposes of renewable energy generation. Therefore, the default position for non-residential uses with exceptionally high energy demands will be provision of some energy needs on site through renewable technologies and contributions towards the Carbon Offsetting in a scheme which will be managed and operated by the Council. It continues to remain unclear from the papers available at this stage how the Council will utilise these contributions within the City and no fund, or schemes have been established to ensure that the contributions truly deliver necessary offsetting. Therefore, the policy is not effective in delivering its aims and objectives in respect to non-residential uses with exceptionally high energy demands.

Neither the NPPF nor NPPG stipulate that all energy needs should be met on site. In addition, draft Policy PM13 (Setting Standards) within the draft NPPF (2025) seeks to limit local standards for energy efficiency, as the Government are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, and should not cover matters which are already addressed by Building Regulations. Therefore, the policy is not justified.

While the draft NPPF (2025) remains in draft, it is considered that the Council should acknowledge the Government's concern and align with the national net zero carbon agenda and timescale, in line with the principles in the proposed Future Homes/Buildings Standard (which apply to regulated energy only) where compliance is measured via national Building Regulations calculations (e.g. SAP/ SBEM) demonstrating carbon

reduction over notional building. This will meet the objectives of the plan but does not put further financial obligations on high growth sectors such as life sciences.

Suggested Amendment to Policy H3: R1: Net Zero Buildings in Operation
Policy R1 should be amended to require developments to comply with Building Regulations to align with the national net zero carbon agenda and timescale.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
R2: Embodied Carbon in Construction	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

Policy R2 relates to embodied carbon in the construction process seeking to ensure this is minimised as far as possible. It is noted that neither Building Regulations or national policy currently require embodied carbon to be assessed. Therefore, TOSP considers the approach adopted by the Council to be proportionate and reasonable to require developments to include high level principles for limiting embodied carbon and only require submission of more detail on Whole Life Carbon for larger applications (developments of 100 or more dwellings, or 10,000m2 or more non-residential floorspace).

This will enable flexibility for future development in the City which will ensure embodied carbon principles are incorporated but not requiring specific targets which may be challenging to meet. In principle this approach is supported by TOSP however, the policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
R3: Retrofitting Existing Buildings	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

TOSP support this policy where buildings are retained. This policy aligns with Policy E1 to deliver further R&D floorspace in existing locations where retrofitting and extending existing buildings will enable the delivery of further R&D floorspace on existing sites. We do, however, note that not all buildings are suitable for conversion and the policy should be caveated to ensure that the redevelopment of sites to make the most efficient use of land is not unduly constrained by having to retain existing buildings.

Chapter 8 – Infrastructure and New Development

This chapter sets out the site specific allocation policies for the Local Plan, as well as specific policies relating to infrastructure delivery.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
CBLAOF: Cowley Branch Line Area Of Focus	Yes	Yes	Support	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

TOSP strongly supports the proposed approach of identifying South Oxford as part of the Cowley Branch Line Area of Focus, which includes The Oxford Science Park. The area presents significant regeneration opportunities and potential for high-density developments, supported by public transport improvements. Particular focus on improving public transport to this area of the City is welcomed, including the reopening of the Cowley Branch Line (CBL) where a new station is proposed at the Park.

Policy or Paragraph Reference	Legally Compliant?	Sound?	Support/ Comment/ Object	If Unsound it is because it is not:
SPS12: Oxford Science Park	Yes	Yes	Comment	Positively Prepared
				Justified
				Effective
				Consistent with National Policy

TOSP strongly supports the continued allocation of the site for employment and being appropriate for development or redevelopment that modernises and intensifies the employment provision. TOSP welcomes specific reference to portions of the allocation suitable for higher buildings, notably the central and eastern part of site, closest to the Kassam Stadium and Leisure Complex, while noting the need to respond to the setting of the Grade II* listed Minchery Farmhouse.

TOSP considers that there is huge potential for intensification of employment floorspace at the Park, from both TOSP and EIT, with the site uniquely positioned to deliver future employment floorspace situated adjacent to a future train station along the CBL and in close proximity residential-led site allocations able to deliver significant residential units to support local housing needs of those employed by companies based at the Park, such as the Kassam Stadium site and overflow car-park site to the east and South Oxfordshire Science Village to the south.

We trust that the above comments will be taken on board in a constructive manner in order to provide a Local Plan that meets the requirements of the NPPF, including being flexible, deliverable and sound.

If you have any questions in relation to this representation, please do not hesitate to contact me.

Yours faithfully,

[redacted]

SAVILLS