www.oxford.gov.uk

OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Roger Smith

Organisation (if applicable): Savills

Address: [redacted]

Email:

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?	◉	○

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

Oxford Local Plan 2045 Submission Draft (Regulation 19)

Response on behalf of Cowley Property Investment Limited

Date of report: March 2026

savills

Contents

1. Introduction 3
1.1 Background 3
1.2 Current Operation 3
1.3 The current allocation policy 4
1.4 Oxford Stadium in the Proposed Plan 4
1.5 Summary of Our Clients overall position 5
1.6 Legal Compliance 6
1.7 National Policy 6
1.8 Duty to Cooperate 6
1.9 Plan Period 7
2. Policy S1: Spatial Strategy and Presumption in Favour of Sustainable Development 8
2.1 Commentary 8
2.2 Conclusion 8
3. Policy S4: Plan Viability 10
3.1 Commentary 10
3.2 Conclusion 10
4. Policy H1 – Housing Requirement 11
4.1 Commentary 11
4.2 Conclusion 12
5. Policy G3 - Provision Of New Green And Blue Features – Urban Greening Factor 13
5.1 Commentary 13
5.2 Conclusion 13
6. Policy CBLAOF – Cowley Branch Line Area of Focus (AoF) 14
6.1 Commentary 14
6.2 Conclusion 14
7. Conclusion 16

Document History

Issue	Date	Issued by	Comment
1.0	10/03	PRB	For Client Review
2.0	13/03	RS	For Submission

1. Introduction

1.1 Background

1.1.1 Savills is instructed by Cowley Property Investment Limited (hereafter 'Our Client') to submit representations in respect of the Regulation 19 consultation on the Oxford Local Plan 2045. Our Client has a major land interest in the city as the owners of the Oxford Stadium on Sandy Lane.

1.1.2 Despite reopening in 2022, the longer-term future of the Stadium remains in doubt given that public interest in greyhound racing has significantly declined and this, combined with continuing objection to the sport from animal rights groups, has led to a significant decline in the number of licenced 'tracks' in the UK down from 250 at the sports popularity peak to the current 18 (source: Greyhound Board of Great Britain).

1.1.3 Speedway, whilst also an activity at the Stadium, is seasonal and is not sufficient in itself to support the long-term financial sustainability of the Stadium. Gambling revenues, the majority of which come from 'online' gambling are what sustain the current Stadium operations but there is little gain for the local economy.

1.2 Current Operation

1.2.1 As you are aware, the use of the stadium for greyhound racing and speedway recommenced in 2022 following a circa 10-year hiatus. The Operators lease was granted for a contractual term of 10 years from 15th December 2021 with a mutual break on 15th December 2025.

1.2.2 Most of the existing activity relates to the main 'grandstand' with the wider site largely open air and exposed to the elements. Greyhound racing operates 2-3 times per week usually on Mondays, Fridays and Saturdays. Speedway operates generally between March and August with home and away events generally on weekly basis.

1.2.3 The greyhound racing and speedway attract a relatively low footfall and patronage with visitors not specifically rooted in the local community. The majority of the Operator's income is generated from an Online Gambling platform(s) which televises the racing overseas. In this respect, the Stadium location is not specific to a large part of its income. Given the low football of local attendees, the car park has been let to a well-known local Life Science company as relief car parking.

1.2.4 There is of course an element of employment, but this is generally relatively lower grade administrative, food & beverage operations and cleaning jobs. The Speedway Teams and dog handlers are not physically based on site other than for race days and travel to competitions in other locations.

1.2.5 More fundamentally dog racing as a 'sport' is in significant decline within the UK. As noted previously, the number of 'tracks' has reduced from 250 down to less than 20[1]. The sport has come under pressure from Animal Rights Groups and attendance numbers have dwindled significantly. Oxford Stadium itself was closed for 10 years before the current Operator recommenced activities in 2022.

1.2.6 The Gaming and Gambling Industry has also been subject to intense scrutiny in recent years due to concerns about compound problems associated with gambling addiction (e.g. financial, relationship and health problems) and concern that online gambling in particular is difficult to regulate, tax or monitor for health impacts etc.

[1] https://www.gbgb.org.uk/about/about-us/

1.2.7 As a 'community' facility the ongoing relevance and longer-term viability of the Stadium is questionable given the low patronage and we are aware that noise generated from the Speedway and greyhound racing is considered to be a nuisance by some local residents.

1.2.8 Whilst there is space below the grandstand for other business activities, we understand that these have struggled to attract and maintain tenant interest and as such there has not been any sustained wider leisure or business activities that benefit the local community

1.2.9 Our Client can confirm that the recent local reporting in The Oxford Mail[2] is accurate and should highlight the perilous and uncertain future of the Stadium

1.2.10 The above should highlight the pressing need for the Council to work with our Client to once again, plan proactively to secure the long term future of the Stadium site. As expressed in Our Clients previous submissions to the now abandoned Oxford Local Plan 2040, the decision to not to carry forward the Site Allocation Policy (SP51) from the current Local Plan 2036 to this emerging Plan is deeply flawed. It is now much more likely that the community uses that the Council seeks to protect will cease much earlier than would have otherwise been the case with the allocation in place

1.3 The current allocation policy

1.3.1 The relevant parts of the current extant policy SP51 are highlighted below:

"Planning permission will be granted for revival of the stadium for greyhound racing and/or speedway, with supporting community or leisure uses and ***enabling residential dwellings on the car park or other areas that will not affect the operation*** *or heritage interest of the Oxford Stadium site.*

If it is demonstrated that bringing speedway and greyhound racing back into use is not viable, high quality residential led redevelopment supported by appropriate uses that will benefit the wider community for example complementary leisure or community uses that include reference to the heritage interest of the site will be supported.

Opportunities should be sought to enhance and promote more sustainable travel to and from the site, in line with Policies M1 to M5."

1.3.2 Importantly, the parts of Policy SP51 highlighted above were identified as being necessary by the Inspectors who conducted the Examination in Public of the Oxford Local Plan 2036. This was achieved via Main Modifications 107 and 108, which paragraph194 of the Inspectors Report (May 2020) confirms were required in order to ensure that the policy is effective and consistent with national policy.

1.3.3 The requirement for enabling development not to impact on the operation of the Stadium was recommended by Sport England.

1.3.4 The opportunity for residential led development in the event that speedway and greyhound racing is unviable was introduced by the Local Plan Inspectors and it remains ever more the case that the medium to long term future of these activities. The parts of adopted Policy SP51 inserted as a result of Main Modifications 107 and 108 therefore remain highly relevant and must be carried through to site development guidance relating to the Oxford Stadium site included in future versions of the Local Plan.

1.4 Oxford Stadium in the Proposed Plan

1.4.1 As currently drafted, the Local Plan 2045 does not carry forward the Site Allocation policy. The January 2026 SHLAA, published as part of the evidence base accompanying this consultation,

[2] https://www.oxfordmail.co.uk/news/25884792.oxford-stadium-2m-debt-two-months-late-accounts/

concludes, "*Site is available but would mean current community uses would need to cease operations if the site were to be redeveloped*." The overall conclusion is that the site does not have potential to be a housing or employment site.

1.4.2 This conclusion seems to completely ignore the adopted Policy and treat the site as a single entity to be either retained in its current state or be redeveloped in its entirety. Policy SP51 is quite clear that the permitted enabling development would be residential development, *"…on the car park or other areas that will not affect the operation or heritage interest of the Oxford Stadium site."* This is the more flexible approach is what Our Client wishes to see retained in the emerging Plan to give the greyhound racing and speedway operations the best chance to survive.

1.4.3 It is noteworthy that the supporting text to Policy C3 states, "*Policy C3 does not apply to places for outdoor sport and recreation (which are within the Use Class F.2), because these are dealt with in Policy G1*".

1.4.4 This approach casts doubt on whether the Council considers the site a community use at all, which renders the SHLAA conclusion even more questionable. As Our Client has previously questioned whether the Stadium is a community use at all, as it is a commercial enterprise and it is not feasible to protect the existing uses or re-provide similar uses within the site in the event that the existing greyhound and speedway uses become unviable

1.4.5 Turning to what is contained in the consultation draft of the Plan itself, we note that on the very first page, the challenges referenced include a "*chronic undersupply of housing.*" Given this well-known problem is recognised from the very start of the Plan, Our Client struggles to understand the logic that has led to the Site Allocation Policy not being brought forward into the new Plan.

1.4.6 The need for both new housing and enabling development to support the future of the stadium is more acute in 2026 than at any other time previously, including when the Site Allocation policy was first introduced to the Development Plan as part of the Local Plan 2036. As discussed above, the Council appear to have little understanding of the perilous situation the stadium finds itself in and, by removing the allocation, risk accelerating the decline into permanent closure.

1.4.7 The removal of the allocation policy would significantly reduce the potential options for the future use or redevelopment of this site, should the greyhound racing and/or speedway cease operating.

1.4.8 Given the above, our Client has no option but to **strongly object** to this Plan, as on the matter of Oxford Stadium, it is fundamentally unsound.

1.4.9 Our Client considers that to make the Plan sound, the extant site allocation policy should be carried forward into the new Plan, largely as it is currently written, but to include the following wording:

"***If it is demonstrated that the speedway and greyhound racing is no longer viable, high quality residential led redevelopment supported by appropriate uses that will benefit the wider community for example complementary leisure or community uses that include reference to the heritage interest of the site will be supported.***

1.4.10 The complete redevelopment of the site should remain the fall-back option in the event there are no feasible prospects of the stadium uses surviving as a viable business. Our Client does not wish to fundamentally change the policy, just merely to see it retained with this wording included to allow flexibility across the entire Plan period. Our Client views the Stadium site as a medium to long term development prospect.

1.5 Summary of Our Clients overall position

1.5.1 More generally, Our Client broadly supports the overarching threads of the draft Plan (Reducing inequalities, addressing climate change, enabling a liveable city and securing delivery) and similarly

supports the emerging planning policies but has comments on certain policies that are of interest. These are set out in the following sections.

1.5.2 The focus of this consultation will be on whether or not the plan meets the criteria for being sound and legally compliant.

1.5.3 It is considered that the draft Plan cannot be considered sound as:

- The capacity based housing target is unrealistically low and could be higher;
- The strategy does not make the most efficient use of previously developed land within the administrative boundary of Oxford city;
- The absence of the Oxford Stadium allocation means the proposed Cowley Branch Line Area of Focus does not properly achieve its potential

1.6 Legal Compliance

1.6.1 Our Client raises no issues with the legal compliance of the proposed Local Plan

1.7 National Policy

1.7.1 We note that reference is made throughout the Submission Draft Local Plan to the National Planning Policy Framework (NPPF) and to Planning Practice Guidance (PPG). Should any changes be made to the NPPF and to PPG during the course of the Local Plan preparation (including its Examination), we would expect the Council to reflect those changes, where appropriate. We, therefore, reserve the right to amend our representations to reflect the new national policy and guidance and any changes the Council makes to the draft Local Plan prior to submission for examination or subsequently.

1.8 Duty to Cooperate

1.8.1 Local planning authorities are currently bound by the statutory Duty to Co-operate (DtC) through the Localism Act 2011, when preparing or supporting the preparation of policies which address strategic matters including those policies of Local Plans.

1.8.2 Paragraph 26 of the NPPF (February 2025) also states that "*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*".

1.8.3 Paragraph 24 of the NPPF (February 2025) also states that "*effective strategic planning will play a vital and increasing role in how sustainable growth is delivered*" and Paragraph 25 states that "*Strategic policy-making authorities should collaborate to identify the relevant matters which they need to address in their plans*".

1.8.4 For the examination of Plans, Paragraph 36(b) of the NPPF states that Plans are sound if they are, amongst other things, based on effective joint working, as evidenced by a statement of common ground (SoCG). The SoCG will form part of the evidence required to demonstrate compliance with the duty to co-operate.

1.8.5 Although the DtC currently remains in place, it is noted that, in his letter to the Chief Executive of the Planning Inspectorate dated 27th November 2025, Matthew Pennycook MP (Minister of State for Housing and Planning) stated that "*The new plan-making system provided by the Levelling Up and Regeneration Act 2023 does not include the Duty*". In addition, "*The Duty will therefore cease*

to apply when the Regulations come into force early next year [2026], including for plans at examination at that point".

1.8.6 As a result of this, the DtC may not be a legal requirement at the time that this Local Plan is examined.

1.8.7 However, it is important to note that Minister of State also restated the importance given by Government that "*LPAs should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas and Inspectors should continue to examine plans in line with the policies in the NPPF on 'maintaining effective co-operation*" (our emphasis).

1.8.8 To address the "*chronic undersupply of housing*" (Chapter 1, third paragraph), "*acute housing pressures*" in Oxford Chapter 2, third paragraph) and the "*urgent need for more housing*" (Chapter 2, third paragraph), even if the legal obligation to comply with the duty to co-operate no longer applies, there is still a requirement for the Council to maximise the provision of housing within the City and continue to liaise with its neighbouring authorities and other organisations to account for any unmet housing need in line with the policies in the NPPF.

1.9 Plan Period

1.9.1 We note that the end of Local Plan period has, since the Regulation 18 consultation, been extended from 2042 to 2045. The extended Local Plan period is supported as it should, assuming that the Plan is adopted without significant delay, provide more that a minimum lifespan for its policies of more than 15 years as required by Paragraph 22 of the NPPF.

2. Policy S1: Spatial Strategy & Presumption in Favour of Sustainable Development

2.1 Commentary

2.1.1 This draft Policy reads, "[*The City Council] … will aim to ensure development is located to…Ensure the continued strength and vibrancy of district and local centres so they continue to attract people and support a range of facilities that meet people's immediate needs conveniently within their local area*." The policy continues to highlight the Councill will also… "*Ensure new development is focused on areas with opportunities for sustainable travel links*…[and]*… Ensure activities that attract large numbers of people are centrally located in the city centre and district centres first, so they are easy to reach by walking, cycling and public transport.*"

2.1.2 Our Client agrees with these policy aims but considers they merely highlight what an opportunity the Council is missing by removing this site from the site allocations within this Plan. The Stadium is located at the heart of the Cowley Branch Line and Littlemore Area of Focus and is clearly in an area that is extremely well served by sustainable transport links. Indeed, the site literally backs onto the Branch Line, to highlight how well-located it is.

2.1.3 Criterion g) of this Policy confirm the Councils approach is "*[ensure] efficient use of land, helping to maximise opportunities on brownfield sites first…*" This is consistent with Paragraph 124 of the NPPF, which reads, "*Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that* ***makes as much use as possible of previously-developed or 'brownfield' land***." [Our emphasis].

2.1.4 Again, Our Client agrees with this policy aim but considers that the Council is failing to follow its own intentions by failing to include prime brownfield sites such as the Oxford Stadium in the Plan despite knowing that it is available, achievable and deliverable within the Plan period.

2.1.5 This failing is further exacerbated and highlighted by the fact that the draft Plan also makes a greenfield allocation at Sandy Lane Recreation Ground, just a short walk from the Stadium site. It is difficult to understand how this Plan would release the Recreation Ground for development ahead of the Stadium site This is a prime example of how the proposed strategy is both severely lacking in ambition and is not consistent with national policy.

2.1.6 Overall, Policy S1 does not actually set out a Spatial Strategy, especially in how it will deal with housing and the unmet housing need identified. The Spatial Strategy policy should explain how the Plan will deliver the Vison and Overarching Threads outlined in the early pages of the Plan, as well as how development will be delivered over the Plan period. Perhaps most importantly, the Spatial Strategy policy should explain how the Council the chronic undersupply of housing.

2.2 Conclusion

2.2.1 Policy S1 fails the following tests of soundness

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

2.2.2 Policy S1 should set out a Spatial Strategy which meets the vision and objectives of the Local Plan, refers to the need to maximise housing delivery in Oxford, sets out how proposed development is to be delivered over the plan period and beyond and establishes how the use of brownfield sites will be maximised.

3. Policy S4: Plan Viability

3.1 Commentary

3.1.1 On a brownfield site like the Oxford Stadium, it is likely that viability will be an issue that affects any future planning application. The consultation draft of the Local Plan sets out an ambitious set of policies that if combined will lead to developers increasingly needing to engage with the City Council and undertake viability assessments under Policy S4.

3.1.2 Our Client is concerned that this approach will have the potential to discourage investment in the city as it would place a burden on applicants early in the application process. Often, as it is not until late in the planning application process that any certainty will be gained, so the requirement to "front load" viability work will add a significant amount of financial cost and uncertainty.

3.1.3 If schemes do proceed, then a final position on where the City Council will land will only be after significant up front cost on the application, and land agreements as well as adding further cost to this process in the preparation of the viability assessment and in paying for the Council's assessor to review the submitted information. The effect will be an even higher development cost and greater impact on what can be delivered.

3.1.4 The viability process will also slow up the decision making process and delivery of development contrary to the overall aim of the NPPF to speed up delivery.

3.1.5 Overall, the approach is inconsistent with Paragraph 35 of the NPPF, which reads, *"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure... **Such policies should not undermine the deliverability of the plan**."* [Our Emphasis]

3.2 Conclusion

3.2.1 Policy S4 fails the following test of soundness:

- Consistent with National Policy

4. Policy H1 – Housing Requirement

4.1 Commentary

4.1.1 Our Client generally supports the aims of this policy in as far as they go but finds the overall lack of ambition to be disappointing. The level of need that this Plan aims to provide for is significantly lower than the figure in the now withdrawn Local Plan 2040significantly lower than the figure in the now withdrawn Local Plan 2040

4.1.2 The Local Plan 2040 was based on a housing need figure of 1,322 dwellings per annum (dpa) (i.e. a total of 26,440 dwellings over that Plan period) whereas the Local Plan 2045 uses a figure of 1,087 dpa (i.e. a total of 21,740 dwellings 2025-2045). This is a reduction in the housing need figure between the two Plans of 4,700 dwellings.

4.1.3 The Policy uses the SHLAA findings on site capacity to justify the approach for setting a modest housing target of 9,267 homes over the plan period, or 463 dwellings per annum

4.1.4 The reduced housing need figure used in the current Local Plan, and the housing requirement figure used in Policy H1 which follows from the Council's assessment of the totality of site capacity in the city, will inevitably result in the delivery of fewer homes, in stark contrast to the Plan's stated aim of creating a city, "*…with strong communities that benefit from equal opportunities for everyone…in* ***access to housing…"*** [our emphasis].

4.1.5 The proposed approach lacks ambition and is likely to exacerbate the existing housing supply problems and increase inequalities, across the city. It is important to note that the city can currently only demonstrate a 2.88 year housing land supply, which is proof that the Council is continuing to fail to properly address the housing crisis in the city.

4.1.6 The findings of these reports, prepared for the Local Plan 2036 remain relevant to the assessment of this Stadium site:

- Cundall, Unlocking Oxford's Development Potential, November 2014; and
- Fortismere Associates, Draft Updated Advice Note on Oxford's Development Capacity, August 2015 (updated December 2015)
-

4.1.7 The Cundall report concluded that, "*This is a brownfield site that should be a sequentially preferable site to building on greenfield. It is in a relatively sustainable location, near to public open space, public amenities and employment opportunities…*"

4.1.8 The Fortismere report concluded that, "*There is clearly a willing land owner that wishes to see the site redeveloped as well as developer interest, so the site is rightly assessed as being 'available'. It is understood that the Stadium is in need for investment and in order to enable its restoration and to bring it back into viable use funding will need to be found. Although we would not want to prejudice where funding may be found, the Council may need to consider whether some enabling development is a potential source (which could perhaps include housing).*"

4.1.9 The conclusions of these reports, albeit they were made a decade ago, remain an accurate assessment of the sites potential.

4.1.10 The supporting text for this proposed policy reads, "*Every effort has been made to maximise the identified capacity in the city through the Strategic Housing Land Availability Assessment (SHLAA) and a Green Belt assessment.*" This is clearly not the case as the proposed Local Plan has

removed Our Clients site from the list of site allocations, despite it being available, achievable and deliverable, just as it was when it was allocated in the current Local Plan.

4.1.11 The Stadium site is 3.37 hectares in size and would likely be suitable for high density flatted development at up to 50 dwellings per hectare. Consequently, it could provide at least 150 units, which would provide a significant contribution to the overall housing supply in Oxford. This level of high density development would be particularly appropriate, given the sites location near to the Cowley Branch Line, which boosts its sustainability credentials.

4.1.12 The interim Report of the Oxford Growth Commission (December 2025) are relevant to the assessment of this policy, which states on Page vi , "*Delivering on the strategic vision [A Vision for Oxfordshire, agreed by the Oxfordshire Authorities in 2019] requires a spatial investment and land use strategy across the County that joins up economic growth with investment in transport, new housing including new affordable housing, achieving net zero, nature recovery and the environment, and skills and employability.* ***A vital element in such a strategy is aligning economic growth with requirements for new housing*** *to improve affordability and reduce commuting pressures. However, for some time there has been no countywide strategy; this alignment has not been achieved, and* ***housing affordability and congestion have worsened****. The commitment to an Oxfordshire Plan 2050, agreed by the local authorities with Government in 2017, was abandoned in 2022. Since then, the gap between Council plans for new housing and what is needed has widened, with current emerging plans collectively falling well short of the minimum requirements set by Government."* [Our emphasis]

4.1.13 Clearly, the proposed approach within Policy H1 will simply exacerbate the problems identified by the Commission and makes no effort to consider a long-term strategy for meeting future housing and economic needs will require cross-boundary working with neighbouring Local Authorities.

4.2 Conclusion

4.2.1 Policy H1 fails the following tests of soundness

- Positively Prepared
- Justified
- Effective

4.2.2 Policy H1 needs to be informed by a much more ambitious strategy that properly considers issues such as unmet needs, in conjunction with neighbouring authorities, and reconsiders all sites previously deemed unsuitable in the SHLAA as clearly the approach taken has been too conservative. Our Clients site is a prime example of this, being a brownfield site that could significantly boost housing supply in the city, but it was deemed unsuitable on extremely thin evidence, which does not match the reality of the situation.

4.2.3 The Council should revisit the contribution that the Oxford Stadium can make to meeting Oxford's housing needs and to reflect this in the Oxford City SHLAA and Policy H1.

5. Policy G3 - Provision Of New Green And Blue Features – Urban Greening Factor

5.1 Commentary

5.1.1 Our Client is broadly supportive of the aim of this policy as it recognises the clear advantages offered by the provision of high quality green space in new developments. However, this requirement could put significant pressure on applicants who have limited site areas and who have certain functions that also need to be achieved in those spaces.

5.1.2 The Oxford Stadium carpark does not benefit from much green infrastructure, what exists is limited to boundary planting. However, if and when enabling development does come forward, it is likely that, to achieve an outcome that provides sufficient financial returns to guarantee the future of the stadium, any development will need to built out at a high density within the limited area of the car park. The application of this policy could have the potential effect of sterilising the site, and other brownfield sites like it, negating the wider benefits such as securing the future of the stadium and providing housing development in a highly sustainable location.

5.1.3 In addition, it is unclear why this policy is needed when the national biodiversity net gain (BNG) requirements now exist and have been replicated in other policies in the Plan. In comparison to BNG, the approach proposed here provides a simple output so it is questionable as to what benefits this policy will offer. It is questioned why this additional layer of calculation is required.

5.2 Conclusion

5.2.1 Policy G3 fails the following tests of soundness

- Justified
- Effective

5.2.2 This policy should be deleted.

6. Policy CBLAOF – Cowley Branch Line Area of Focus (AoF)

6.1 Commentary

6.1.1 Our Client generally agrees with the aims of this policy, particularly the positive approach to (re)development of site, but considers that the exclusion of the Oxford Stadium from the list of allocated sites within the AoF to be a major oversight. This site continues to be a prime location for new high quality residential development, precisely of the type that this Policy is seeking to encourage.

6.1.2 The Stadium site sits immediately south of the Cowley Branch Line and is in very close proximity to the BMW Mini Plant and the Oxford Business Park

6.1.3 The absence of this site can only lead to the conclusion that this policy is unsound. As discussed in in previous sections, the SHLAA conclusions that have led to this site being discounted are fundamentally flawed and at odds with the draft Plan's own approach to community facilities.

6.1.4 Our Client also supports the re-instatement of passenger train services on the Cowley Branch Line (CBL) and the two new stations, which will improve public transport accessibility to this part of the City (including residential areas, key employment sites and sites allocated for development. One of the proposed stations is on Sandy Lane West, a short walk from the Stadium, further highlighting what a crucial site the Stadium has the potential to be in aiding the Council achieve its aims in this AoF.

6.1.5 The supporting text for the Policy identifies that the Oxford Stadium Conservation Area lies within the AoF. It is important to note that the heritage interest of the Conservation Area is associated primarily with the greyhound and speedway uses as community and/or leisure activities. Should these uses cease or relocate, then the significance of the heritage asset would reduce, and it is unrealistic to expect a future reuse of the existing facilities or one that preserves much of the existing built fabric.

6.1.6 Our Client is strongly of the opinion that should the Stadium site eventually be completely redeveloped, the Oxford Stadium Conservation Area designation should be accordingly removed. Whilst any such redevelopment could be reasonably be expected to retain the key heritage features in some capacity, this would not be sufficient to justify the designation itself.

6.1.7 With regard to the requirement at Part (o) of this Policy once the CBL and public transport enhancements in the defined 1,500m buffer zone are delivered, Our Client considers that no further financial contributions should be sought. The additional spending of new residents of the site would fund any further improvements necessary.

6.2 Conclusion

6.2.1 Policy CBLAOF fails the following tests of soundness

- Positively Prepared
- Justified
- Effective;

6.2.2 Policy SP51 of the extant Local Plan 2026 should be carried forward as a Site Allocation connected to this policy and the policy itself should amended to reflect the important role the Stadium can play in achieving the high quality sustainable growth the Council is seeking in this AoF.

7. Conclusion

7.1.1 This representation contains recommendations that, in Our Clients view, are necessary to make the draft Local Plan "sound". Whilst there is general support for the Vision and Overarching Threads underpinning the Plan, the resultant strategy is considered to be fundamentally lacking in ambition and scope for a city that has acute affordability issues and an acknowledged chronic undersupply of housing.

7.1.2 In particular, Our Client considers that the draft policies for the Cowley Branch Line Area of Focus do not reflect the full potential of what could be achieved in this location. The long term uncertainty about the operation of Oxford Stadium remains but the Council has made a poorly informed decision to effectively "de-allocate" the site. This approach is contrary to the Plans stated aim of prioritising development on brownfield sites.

7.1.3 Our Client remains committed to developing this site, initially in part, to give the Stadium the best possible chance to survive. Therefore, for this Plan to be considered sound, the Plan should retain the Oxford Stadium allocation, carrying forward the current Policy SP51 from the Local Plan 2036. There has been no material change in circumstances to warrant its removal.

7.1.4 The allocation should retain its current flexibility to allow the complete redevelopment of the site, should the current greyhound and speedway uses cease, as they have before, and it becomes clear that they are no longer viable on this site. The Council needs to be realistic as the current approach could preclude development on the site for the duration of the Plan period, regardless of whether the current uses continue or not.

7.1.5 We would be grateful for acknowledgement of receipt of this submission and also for updates to be provided on the future stages of the preparation of the Local Plan, including the Examination

7.1.6 We would welcome dialogue with the planning policy department to discuss the site opportunity.

7.1.7 If you have any questions or require any further information, then please do contact Savills on the addresses below.

Roger Smith
Director

[redacted]

Peter Brampton
Senior Planner

[redacted]

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

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD