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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: Kiran Ubbi

Organisation (if applicable): CBRE Ltd.

Address: [redacted]

Email: [redacted]

Date: 13th March 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.

- [x] If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.
- [ ] If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

| | Yes | No |
|---|---|---|
| **Do you wish to speak at the examination hearings?** (Please note that the Inspector will decide who to invite to speak) | ◉ | ○ |
| **Do you wish to be notified when:** | | |
| the Council submit the Oxford Local Plan 2045 to the Government? | ◉ | ○ |
| the Inspector's Report is published? | ◉ | ○ |
| the Oxford Local Plan 2045 is adopted by the Council? | ◉ | ○ |

## GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

## HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

**planningpolicy@oxford.gov.uk**

**Planning Policy Team**
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
**T: 01865 252847**
**planningpolicy@oxford.gov.uk**
**www.oxford.gov.uk/localplan2040**

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

# DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

**Please read the accompanying notes before completing Part B.** The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

**Q1**. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

| | | | |
|---|---|---|---|
| Paragraph | | Policies Map | SPCW7 |
| Policy Number | SPCW7 | 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 refer to supporting representations submitted by CBRE on behalf of Nuffield College.

*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 refer to supporting representations submitted by CBRE on behalf of Nuffield College.

*Please use an extra sheet if completing a paper copy.*

**This is the end of the comment form**

CBRE

Oxford City Council
Planning Policy Team
Town Hall
St Aldate's
Oxford
OX1 1BX

13th March 2026

# Oxford Local Plan 2045 – Regulation 19

Dear Planning Policy,

## Introduction

CBRE is instructed by Nuffield College to submit a response to Oxford City Council's (OCC) current Oxford Local Plan 2045 – Regulation 19 consultation.

The Nuffield Sites comprise the 'Island site' (the area bounded by Park End Street, Hythe Bridge Street, the Wareham Stream and Frideswide Square), the Worcester Street car park site, and the South Frideswide Square parade and Becket Street (adjacent to the well-known Jam Factory). All three sites lie within the West End Area of Change as identified within Oxford City Council's adopted 2036 Local Plan (2020). The Island site and Worcester Street car park site are specifically allocated under Policy SP1 of the adopted Local Plan and all three of the Nuffield Sites are allocated for mixed use development under Policy SPCW7 of the current Regulation 19, 2045 Local Plan.

As a major landowner in the West End, Nuffield College wishes to continue to work with OCC and other stakeholders to see the area's potential realised, and it welcomes the opportunity to further engage with OCC on the emerging 2045 Local Plan for Oxford, prior to submission of the draft Plan for Examination. It is important that the emerging Plan provides the planning policy framework, to act as the enabling policy tool, in facilitating the much needed transformation of these and other key sites in the West End, which is the gateway in to the city.

The main focus of this response, is on the emerging 2045 Local Plan's compliance with the tests of soundness as set out in paragraph 36 of the National Planning Policy Framework (NPPF, 2024). Notably, if the draft Plan has been positively prepared, is justified, effective and consistent with national policy.

Overall, we consider that if the proposed modifications set out within these representations are embedded into the emerging policies, the draft Plan could be found to be sound.

The proposed modifications requested are intended to ensure that the emerging Plan is positively prepared in a way that is aspirational yet deliverable, and that the policies it contains are clearly written for the purposes of any decision maker who is required to assess how development proposals should be considered against them. Some modifications are requested in order to enable the emerging policies to be aligned with market realities and to ensure that contributions requested do not undermine deliverability of the Plan, in line with the requirements of paragraphs 32 and 34 of the NPPF.

Our response is set in the context of Nuffield College bringing forward a sustainable mixed-use employment-led Masterplan for its sites. The College wishes to contribute to enabling a transformation of the West End Area of Focus, benefitting all those who work, live, socialise, and visit the area, and securing wider social and economic benefit for the city, helping to bring about creation of a new Innovation District, and improving this important gateway to the city and the region. These aspirations are all in line with the adopted West End and Osney Mead SPD (2022) and those of the established Oxford Growth Commission.

# Oxford Local Plan 2045 – Regulation 19

## Chapter 1: Introduction and Strategy

**Draft Policy S4: Plan Viability**
Draft Policy S4 states '*The policies in the Plan have been viability tested and planning applications that fully comply with them will generally be assumed to be viable.*

*The City Council will always expect developers to have considered the financial implications of affordable housing policy requirements, and local market indicators, when purchasing the land for development.*

*If the combined impact of the policies in the Plan do result in a site being unable to deliver a viable development, and if an applicant can demonstrate particular circumstances that justify the need for a viability assessment, negotiations will take place on an 'open book' basis, informed by robust evidence in the form of an independent viability appraisal carried out by independent assessors appointed by the City Council in agreement with the applicant'.*

We would like to highlight under Policy S4, that there are various emerging policies in the Plan which when combined, or indeed in some instances applied in isolation, do not support deliverable urban development and redevelopment. Such policies are commented on as part of these representations. Therefore, it cannot be taken that the policies in the Plan, when fully complied with, will result in deliverable development. Implementation of the amendments proposed to various policies set out in this response would enable a more constructive policy landscape in which to bring forward development on the Nuffield Sites. However, as above and to reiterate, it cannot be said at this stage, that if all policies are complied with in the emerging Plan, this would result in deliverable development for the City.

## Chapter 2: A Healthy Inclusive City to Live In

**Draft Policy H2: Delivering Affordable Homes**
It is noted that further viability testing has been published as part of the Proposed Submission Draft evidence base (Oxford City Council: Local Plan Viability Assessment Update, December 2025). The Proposed Submission draft Policy H2 maintains the 40% affordable housing requirement, comprising 80% as onsite Social Rented dwellings. The emerging Policy refers to "a minimum of 40% of units".

The BNP Paribas Viability Assessment Evidence Base Document concludes "*The results do not point to any particular level of affordable housing that most schemes can viably deliver, and we therefore recommend that a 40% target be adopted and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.*"

It recommends a "40% target" (not minimum), recognising there are significant variations in the percentages of affordable housing that are capable of being provided, depending on private sales values, scheme composition (i.e. flats or houses) and benchmark land value. Importantly, the viability evidence base document recognises the importance of site-specific assessments. This should be recognised within the draft Policy and for the Nuffield Sites i.e. that affordable housing requirements will be determined through a site-specific approach. This is in line with the Viability Assessment recommendations.

**Draft Policy H3: Affordable Housing Contributions from Other Types of Development**
It is noted that during the Regulation 18 consultation, the Council were reviewing the scope and possibility of introducing financial contributions from commercial development under emerging Policy H5. This has now materialised into emerging Policy H3: Affordable Housing Contributions from Other types of Development, which includes employment generating uses.

For commercial/ employment generating uses delivering a net gain in floorspace of 1000sqm GIA or more, the draft Policy seeks a contribution of £10per sqm GIA. Whilst the Viability Assessment (2025) suggests that introducing such

a contribution has a modest/de-minimis cost impact, we maintain that the introduction of this draft Policy would impede deliverability.

Seeking affordable housing contributions from commercial development places an additional significant financial requirement upon commercial development, particularly in light of the revised CIL rate for Class E offices and R&D which has increased from £33.74 to £168.74 per square meter GIA (non-indexed). The large uplift in commercial CIL charge will add significant financial pressure to the deliverability of commercial schemes. Seeking further financial contributions from commercial development would render schemes undeliverable on the basis of existing and ongoing viability challenges, working within constraints of complex urban development and within the sensitive heritage constraints that pertain in the city with regard to quantum of acceptable development.

Whilst the provision of affordable housing is supported as a priority in principle, this needs to be balanced against the commercial capability and deliverability of schemes. As per Regulation 18 comments, seeking financial contributions for affordable housing from commercial schemes is not supported and we are of the view that this would have a significant impact on the ability to deliver transformation change within the City which is also a clear Council priority.

To this end it is considered that this draft Policy has not been positively prepared, is not effective and is not consistent with national policy.

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

**Draft Policy E1: Employment Strategy**
Continued support is applied to emerging Policy E1 which considers new employment generating uses within the city centre as an acceptable location for delivering new, modernised and intensified employment floorspace.

We suggest updating the initial paragraph of the draft policy to '*All new development for employment purposes …*' as opposed to '*All new development on employment sites*'. The effect of this change would be to make the paragraph in question applicable to employment development more broadly rather than only being applicable to allocated/existing employment sites. This clarification and amendment would ensure the policy is effective.

**Draft Policy E4: : Affordable Workspaces**
It is noted that Nuffield Sites are expected to deliver affordable workspace as part of their Masterplan and that details of the size, marketing, servicing and the management of these spaces should be set out in an affordable workspace strategy.

We note that the definition of affordable workspace states that such space is to be available for rent set at an agreed rate below the commercial rent. It is understood, based on the current drafting of the Local Plan that the percentage reduction below the commercial rent is not defined and is to be agreed with OCC as part of the planning process. Our understanding is that any commercial rent reduction will need to be based on the ability of any scheme, i.e. in this case Nuffield Sites, to present a proposal that is capable of being financially deliverable and therefore able to absorb such costs as part of any viable scheme. Affordable workspace has a significant impact on deliverability and is a core and fundamental consideration in terms of development feasibility and deliverability.

It is important for OCC to recognise the cumulative impact of all of the combined policies that would apply to landowners / developers such as Nuffield College who are seeking to bring forward major and large scale employment generating proposals to the City. As stated, when all draft policies are combined, it makes for a highly challenged position to enable deliverable development to come forward. Whilst the NPPF seeks for Plans to be aspirational, it also seeks for them to be prepared positively, in a way that they are deliverable. It is considered that this balance has not yet been struck when considering the draft Plan as a whole. This is apparent when reviewed against further commentary and request for amendments.

**Draft Policy E5: Hotel and Short Stay Accommodation**
The draft Policy should make it evident that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward loss of short stay accommodation where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of short stay accommodation is supported. This additional bullet point could be incorporated / read as follows:

- *Or forms part of comprehensive, mixed use development scheme.*

## Chapter 6: A City that Respects its Heritage & Fosters Design of the Highest Quality

**Draft Policy HD3 Designated Heritage Assets**
It is noted that the draft policy states that *'substantial harm to or loss of significance of a conservation area should be wholly exceptional'*. It goes on to state that *'where a proposed development will lead to substantial harm to or loss of the significance of a conservation area, planning permission or listed building consent will only be granted if all of the criteria in paragraph '214' (or equivalent in any update) of the NPPF (National Planning Policy Framework) can be demonstrated or unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, which should be set out in the heritage assessment.'*
It is considered that the word *'wholly'* should be removed from the policy drafting as this is not consistent with the wording of paragraph 214 of the NPPF.

The above revision was also requested in the Regulation 18 consultation (under Policy H1) and is required in order to be consistent with national policy.

**Draft Policy HD6: Views and Building Heights**
The emerging Policy states *'Planning permission will not be granted for development that will not retain the special significance of views of the historic skyline, both from within Oxford and from outside'*. It also states *'Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view. The View Cones and the Historic Core Area (1,200m radius of Carfax tower) are defined on the Policies Map'*.

It should be made clear within the policy that a view is not itself a heritage asset and does not have significance in the same way a heritage asset does, as defined in the NPPF. It is considered that replacing 'special significance' in the first and sixth paragraphs of the policy with 'important characteristics' would appropriately respond to the guidance set out in GLVIA 3rd edition.

It is also considered that 'limited in bulk and must be' should be removed from the following sentence *'Development above this height must be limited in bulk and must be of the highest design quality'*. The meaning of these words can be overly interpreted and it is considered unhelpful to include within the policy. Removal of the words does not dilute the intention of the policy due to the supporting explanatory paragraphs and text which sit alongside Policy HD6.

The above revision was also requested in the Regulation 18 consultation (under Policy H9) and is required in order for the emerging Policy to be considered justified and consistent with national policy.

## Chapter 7: A Liveable City With Strong Communities and Opportunities for All

**Draft Policy C2: Maintaining Vibrant Centres**
Under Active Frontages, it is noted that for City Centre Secondary Frontages 70% of frontage should be retained in Class E use. We note that no provisions/ guidance is provided around this in the NPPF. Following consideration, it is proposed that this policy should apply to locations which sit outside of site allocations where site specific circumstances determine an alternative, more flexible approach to enable delivery of active frontages but also wider plan objectives. It is considered that wording should be inserted into the emerging policy to reflect that unless

otherwise agreed with the local planning authority on the basis of site specific circumstances, the provisions set out under the active frontages can be considered flexibly. In such instances, any proposal would be required to demonstrate that active frontages have been maximised and incorporated in the most appropriate locations to promote the overall vitality and activity at ground floor level but have regard to the need to offer appropriate frontages for office receptions and similar, and servicing of the development, together with considering the potential demand from active frontage occupiers for the space and the impact this might have on existing active frontage locations.

With respect to Nuffield Sites, it is considered that adopting this approach will enable the delivery of successful active frontage through positive masterplanning and place making exercise. It is requested that the above measures are incorporated into draft Policy C2 in order for it to be considered effective and justified.

**Draft Policy C3: Protection, alteration and provision of local community facilities**
Draft Policy C3 seeks to protect small scale shops that are considered/ defined as community assets in the use class order. Whilst it is assumed this would not apply to city centre sites this is not clearly articulated in policy and this could lead to the misinterpretation of policy C3. It is considered that an abstention of this policy should apply to city centre sites proposed for redevelopment, where protection of such spaces would prohibit successful development coming forward comprehensively where identified as such in the Local Plan i.e. in this case, the Nuffield Sites. To enable delivery of defined emerging site allocations within the plan, wider policies in the plan need to be set in context to enable all palpable planning benefits to be delivered.

It is requested that the above measures are incorporated into draft Policy C3 in order for it to be considered effective and justified.

**Draft Policy C5: Protection, alteration and provision of cultural venues and visitor attractions**
In line with the above approach, it should be made evident in the policy that flexibility should apply with regard to the application of this policy against wider plan policies to enable development to be delivered to meet the ambitions of the Local Plan and in particular with reference to the Nuffield Sites. It is suggested that supporting text is incorporated which supports a flexible approach toward protection and retention of cultural venues where site allocations are supported for comprehensive mixed use redevelopment, as well as an additional bullet point included in the policy itself regarding the list of circumstances where the loss of cultural venues is supported. This additional bullet point could be incorporated / read as follows:

- *Or forms part of comprehensive, mixed use development scheme.*

It is requested that the above measures are incorporated into draft Policy C3 in order for it to be considered effective and justified.

## Chapter 8: Infrastructure and New Development – Areas of Focus

**West End and Botley Road Area Of Focus**

This section focuses on the West End and Botley Road Area of Focus within Chapter 8. Some of the key matters relating to this key area of focus are:

- *The process of transforming this under-performing area has been ongoing for a number of years ...There is further potential for the West End to become a vibrant city quarter through the successful development of a number of other key sites in the area.*

- There is an *opportunity for well-designed high-quality buildings, public realm and streets that reflect and are well-related to, the historic core, the watercourses, and views into and out from the area. Care therefore needs to be taken to ensure that the city's unique character and setting is not lost or harmed through redevelopment and regeneration of the area.*

- *The heights of new buildings will be an important consideration in this Area of Focus and there is likely to be a degree of tension in delivering development that protects and enhances Oxford's iconic dreaming spires and the ambitions of delivering certain development types.*
- *Throughout the West End there are opportunities to enhance or improve the area where poorly integrated incremental development and large blocks with little relationship to the street detract from the heritage quality and experience of walkers and wheelers.*

We note that the West End and Botley Road Area of Focus includes Oxford's West End and the Nuffield Sites. As is acknowledged, Oxford's West End is a critically important part of the city and in particular a key arrival point. The area is currently underperforming and underdeveloped. In particular, the area between the station and the historic core currently fails to act as a cohesive, distinctive place, a place people want to spend time, and a place that positively connects with the wider city. There is clear potential for the West End of Oxford to be transformed into a vibrant city quarter through the successful development of a number of key sites in the area, notably the Nuffield Sites.

As is rightly noted, heights of new buildings will be an important consideration. Whilst this is noted as having *a 'likely degree of tension'* we would advocate that in embracing change through development via high quality architecture and by adopting high quality design and placemaking principles, a well-considered approach can be taken to introducing development of scale to the West End that makes a positive and balanced contribution to the city's character and setting. It is to some degree inevitable that regeneration and redevelopment will create change to the character and setting of the city, though change cannot, in itself and in all instances, be considered harmful. This must be recognised by the Council in order for aspirational transformation of the West End to become reality.

Policy WEBRAOF: West End and Botley Road Area of Focus is broadly supported, however in drawing on comments above we note the following wording is included under Urban Design and Heritage *e) Good quality urban design and place making including appropriate building heights for their setting that do not negatively impact on key views or historic skylines.* Aligned to the above, change to a view / skyline cannot in itself automatically be considered a negative impact. Whilst we note there is a townscape and visual impact process to be followed, the application of the policy must also be considered in how it may be applied in the decision making process. Given that wherever buildings are proposed over 15 metres, they should be accompanied by a visual impact assessment, which is required to show how the proposal relates to Oxford's historic skyline/views and how it has had regard to the High Buildings TAN, it is considered that the words *'that do not negatively impact on key views or historic skyline'* can be removed from the Policy, as this process is already captured via the High Buildings TAN.

The Nuffield Sites are fundamental in supporting the delivery of an Innovation District in this key part of the city and to realising the potential of Oxford's West End by supporting Oxford's knowledge economy, provision of commercial space, and providing opportunities for a variety of occupiers from SMEs and startup businesses, research and development / life sciences occupants to head quarter office spaces. There is also the additional benefit that they are all in a single ownership allowing the owner to think strategically about the nature of the uses on parts of the sites, thereby promoting a Masterplan approach for the three sites. The planning policy framework must be support their delivery.

**Policy SPCW7 – Nuffield Sites**

Nuffield College have been liaising with OCC Planning Policy Officers in the drafting of the Nuffield Site allocation policy. Whilst this has been the case and is broadly supported, the following comments and proposed amendments are deemed to be required in order for the site allocation to be considered more clear and appropriate, to provide clarity, and to support decision making for the sites.

Whilst it is noted that unit numbers included in all site allocations include net gain figures, it has consistently been requested that 59 dwellings with net gain makes delivery of the overall aspirations for the Nuffield Sites challenging. We understand that the vacant units have already been accounted for as lost and not required to be reprovided,

however the policy is not explicit in this. It is therefore considered that 'net gain' should be removed in order to provided clarity and support the site deliverability.

For part b) of the Policy, it states *b) Opportunities should be taken to improve access to Castle Mill Stream from the Worcester St Car Park site*. It is requested that the wording is revised to *Opportunities should be explored to improve access to Castle Mill Stream from the Worcester St Car Park site*. This is to ensure such opportunities are investigated and carried forward,if feasible.

It is considered that part e) relating to Flood Risk Assessment is overly detailed and the requirements set out in the policy would form part of FRA and as required by national policy. It is considered that this part of the policy can be simplified.

With respect to part g) which focuses on landscape / visual impact assessment work, it is states that *Special attention will need to be paid to views from the Castle Motte to avoid harm to the setting of Oxford Castle*. Whilst the visual impact assessment work will serve to inform and guide any scheme development, it is likely to be impossible given the immediate context to avoid harm completely. Adding this prescriptive restriction is considered unhelpful and it is suggested that rather than using the word 'avoid' the wording is updated to include 'manage harm'. It must be ensured that the overall aspiration of the Nuffield Sites is not lost or stymied by overly prescriptive or constraining policy. By making this change, the policy requirement still ensures respectful and careful consideration is given to this important view.

Part h) of the Policy states *Proposals should demonstrate how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach*. The existing scale and function of the Nuffield Sites, particularly for the South Frideswide Square and Island Site must be recognised for their limited contribution to the entrance of the city. To enable transformational change and to achieve the objectives set out in the draft Plan and the West End and Osney Mead SPD, it is requested that the words 'demonstrate how' in the first sentence are updated to 'review if'. The intention and purpose of the policy remains the same but this minor revision would assist the decision maker in how its application should be applied through the decision making process.

Overall, the clear intention and prospect for the Nuffield sites is for them to be a commercial led mixed use proposition key to delivering an Innovation District in the city. Collectively the Masterplan would propose public realm, landscaping, biodiversity and urban greening enhancements alongside other infrastructure improvements as required and necessary.

The above modifications are requested in order for Policy SPCW7 to be considered as justified and effective in line with NPPF tests and to support the decision making process.

## Summary

Given its importance in establishing the planning policy framework and policy platform for the Nuffield West End Masterplan, it is crucial to ensure that the 2045 Local Plan is sufficiently defined on site specific aspects whilst providing the necessary flexibility when applying wider Local Plan planning policies to such site proposals. This is to ensure they are able to successfully deliver a transformational development, new living accommodation, employment growth in the form of a new Innovation District at the Nuffield Sites, and enable the delivery of significant benefits for the city and its various communities.

Overall, it is considered that if the proposed modifications set out within these representations are embedded into the emerging policies, the draft Plan could be revised to be made sound.

The proposed modifications requested are to ensure the emerging Plan is positively prepared in a way that is aspirational yet deliverable and changes made in order for the Plan to contain clearly written policies which are clear to any decision maker, should they come into effect, about how development proposals should be considered against them. Some modifications are requested to enable policies to be aligned to market realities and to ensure that contributions requested do not undermine deliverability of the Plan, as so is required by the NPPF (paras. 32 and 34).

CBRE

[redacted]

As noted, we would very much welcome the opportunity to continue to work with you to address any queries you may have, to ensure the 2045 Local Plan is a positive policy document which will help deliver the ambitions set out for Nuffield College's sites in Oxford's West End.

Yours sincerely,

Alison Tero

[redacted]