

Stage 1 Hearing Statement – Oxford Local Plan 2045 Examination – Firoka

Matter 2 – Housing and Employment Needs

Date: 08 October 2026

Introduction

1. This Hearing Statement is submitted in relation to the examination of the Oxford Local Plan 2045 (Draft Local Plan) by Prior + Partners on behalf of Firoka.
2. Firoka has significant land interests within the Oxford City Council (OCC) administrative boundary and is promoting a number of these for development, namely the Kassam Stadium (Policy SPS7) and the Overflow Car Park (Policy SPS11). Firoka welcomes the allocation of these sites and the ambition of the Local Plan to bring forward key strategic regeneration opportunities.
3. Firoka have appointed planning and masterplanning consultants alongside commercial advisors to prepare development capacity studies for the stadium and overflow car park sites that examine a viable balance of uses that responds to city, regional and national aspirations for the Cowley Branch Line Area of Focus. These capacity studies will inform a comprehensive masterplanning exercise covering both the Kassam Stadium and Overflow Car Park sites to ensure an integrated, coordinated and balanced proposal in line with city policy.
4. This statement should be read alongside our Reg 19 Response and provide responses specifically in relation to the MIQs. Our comments are focused on a number of clarifications and proposed modifications considered necessary to ensure that the Draft Local Plan and the specific policies supporting the delivery of the allocations are sound and enable sustainable development to be brought forward.
5. This Hearing Statement focuses on Matter 2 and a separate Hearing Statement has been prepared in relation to Matter 3. A separate Hearing Statement will be prepared in relation to the specific allocations ahead of the Stage 2 Hearings.

Issue 6 - Employment Land Needs – Policy E1

Q3 Will the Plan ensure that employment needs are met over the plan period? Is the economic strategy and the location of proposed sites sufficiently clear enough to be effective?

The strategy set out in Policy E1 focuses on intensifying and modernising existing Key Employment Sites and other employment sites in the city or district centre to meet identified employment needs without requiring additional sites to come forward. This means that there are limited opportunities to bring forward employment development on sites outside of these areas, particularly for sites which currently are not in employment use.

This restrictive approach does not appear to recognise the importance of supporting economic growth in Oxford and risks employment needs being unmet if there are deliverability challenges with the types of sites envisaged to accommodate employment needs. We therefore consider that there should be greater flexibility to ensure that employment sites can come forward on other sites where appropriate.



Furthermore, as set out in our Reg 19 Response and our Matter 3 Hearing Statement, we do not consider that the policy is clear, as it creates ambiguity on whether employment uses are appropriate on allocated sites. Policy E1 states that proposals for employment generating outside of the specified locations will not be granted. However, the specified locations do not refer to allocated sites where employment use may be appropriate, such as at Kassam Stadium. The associated policy allocation (Policy SPS7) allows employment-related uses on this site, therefore it is not clear how Policy E1 would apply to such circumstances.

To overcome these issues and prevent Policy E1 from being ineffective and from unnecessarily preventing employment uses from coming forward on appropriate sites, we suggest that the bullet point list of appropriate locations in Policy E1 is expanded to explicitly recognise allocations where employment uses are considered appropriate. This will ensure that there is clarity that employment uses can come forward where specified as being appropriate within an allocation.