

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

Matter 3 – Spatial Strategy & Approach to Development

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 3 and a separate Hearing Statement has been prepared in relation to Matter 2. A separate Hearing Statement will be prepared in relation to the specific allocations ahead of the Stage 2 Hearings.

Issue 1 – Spatial Strategy – Policy S1

- Q1 *What is the spatial strategy and is it sufficiently clear to users of the Plan?*
- Q2 *What are the 'Areas of Focus' and how do they relate to Policy S1 and the strategy?*
- Q3 *Is it sufficiently clear to users of the Plan what types of development will be permitted and where? Is the spatial strategy effective?*

We support the overall ambitions of the spatial strategy and the proposed 'Areas of Focus', particularly the recognition of the importance of the Cowley Branch Line Area of Focus and its potential to secure new development around the Kassam Stadium and the proposed Cowley Branch Line, capitalising on the

opportunity to benefit from the re-instatement of the train line and the improved accessibility which will support sustainable development.

In the context of the proposed allocations around the Kassam Stadium (Policies SPS7 and SPS11), a number of inconsistencies have been identified between policies in the Draft Local Plan, as set out in our Reg 19 Response. This means that there is not clarity on the development that will be supported on these sites. We will provide further commentary on the site allocations as part of our Stage 2 Hearing Statement.

Issue 4 – Employment Strategy – Policies E1 & E2

Q1 What is the justification for restricting employment generating uses outside Key Employment Sites, city and district centres and existing lawful employment sites? Is this consistent with paragraph 85 of the Framework, which requires planning policies to help create the conditions in which businesses can invest, and paragraph 86 e), which requires policies to be flexible enough to accommodate needs not anticipated in the Plan?

Q2 What is the justification for requiring employment proposals outside Key Employment Sites and city and district centres to “follow the sequential approach for new town centre uses”?

As set out in our Reg 19 Response, it is considered that Policy E1, in its current drafting, is too restrictive as it limits new employment development to a specific group of sites (Key Employment Sites, city and district centres and existing employment sites), and states that proposals for employment generating uses outside of these areas will not be permitted. This does not recognise the fact that there may be appropriate sites not currently in employment use which are outside of the town and district centres, for example where employment uses have been allocated on sites outside of these key locations.

This is evidenced in the proposed allocation for Kassam Stadium (Policy SPS7) which confirms that employment uses are acceptable: *“There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site.”* The wording of Policy E1 does not account for such scenarios. Given the inconsistencies between these policies, there is a risk of these policies being ineffective.

Furthermore, the approach taken in Policy E1 is not consistent with the relevant NPPF paragraphs, in particular paragraph 85 which seeks to create conditions where businesses can invest, expand and adapt. In addition, Paragraph 86 (a) requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, and part (e) requires policies to be flexible enough to accommodate needs not anticipated in the plan.

Policy E1 would effectively limit employment development from coming forward unless within specific locations, and does not currently include site allocations which have been found to be appropriate for employment uses. The policy also suggests that a sequential test would be required, which is not considered appropriate for allocated sites whereby employment uses have already been found to be appropriate.

To overcome these issues, as set out in our Matter 2 Hearing Statement, we consider that the policy should explicitly recognise that employment uses are acceptable where supported by site specific allocation policies.