



The Local Plan 2045 will be used to ensure
Oxford is a fairer, greener and healthier city

Oxford City Council Response to Inspectors' Matters, Issues, and Questions

Matter 3: Spatial Strategy

Issue 1 – Spatial Strategy

Q1 What is the spatial strategy and is it sufficiently clear to users of the plan?

The spatial strategy of the Local Plan is to support and actively manage the delivery of much needed homes and economic growth within the city, whilst recognising and responding to its environmental and heritage assets. This is achieved by: maximising opportunities for housing, supporting an inclusive economy, respecting the city's world class heritage assets, protecting and responding to its environment, while retaining and enhancing the important amenity and Green Infrastructure assets, and supporting the city in moving towards being net zero carbon.

The spatial strategy has been developed in a way that reflects the specific circumstances and interdependences of Oxford City by collectively employing a range of components, namely, the City and District Centres, Areas of Focus (AoF), Key Employment Sites, the Green Belt and the Green Infrastructure Network. Each of these components has a structural quality, directing and guiding development to the most appropriate locations. A summary of each of these components is provided in more detail below. The plan is permissive of housing, and development more generally, throughout the city, but the spatial strategy uses these key components to help structure the strategy and to provide more specific, place-based guidance for users, with a view to ensuring that development is delivered successfully in line with the balanced approach.

The spatial strategy was developed and refined throughout the plan-making process and was particularly influenced by the consideration of growth strategy alternatives through the Sustainability Appraisal ([CSD.004a](#)). In developing the spatial strategy, the City Council needed to consider the tight administrative boundary around the built-up area, the need to identify sites to accommodate growth (and reduce the level of unmet need), the balance between different land uses, the need to provide supporting infrastructure, and the protection of environmental and heritage assets, amongst other considerations. A range of different possible approaches were identified and tested. As is discussed in responses to questions under Matter 1/Issue 3, the growth strategy testing explored different ways in which the Local Plan's vision, themes and objectives could be achieved and appraised their impacts against sustainability in order to inform the development of the Local Plan.

Following consideration of a range of reasonable alternatives as part of this testing, the City Council's chosen growth strategy involves a focus on planning for new homes -responding to the significant pressure in the city for improving access to housing and addressing ongoing affordability issues whilst striking a careful balance with providing for employment floorspace needs and delivering on wider plan objectives.

Decisions about thematic policies and site allocations flowed directly from the chosen growth strategy. Together these help to express the spatial strategy of the Local Plan. The spatial strategy is set out clearly in Policy S1. The following sections explain the purpose and features of the key components which comprise the spatial strategy and help deliver it.

The District Centres and the City Centre are identified as transport hubs and service centres, where mixed-use, high-density developments are expected. Encouraging development within

these existing hubs ensures that they retain their strength and vibrancy and accommodate the services and facilities required to meet local needs reducing the need to travel further. The centres are also well serviced by establish transport links which ensures that development within them is well-connected and sustainable.

The AoF have been identified as particular locations where there is opportunity for residential and/or employment growth for example with multiple site allocations or key employment sites in close proximity, where there is the potential to secure wider benefits by looking comprehensively at those opportunities. There may also be particular sensitivities and infrastructure requirements which need to be considered and provided, so these areas benefit from a more strategic policy approach.

The Key Employment Sites are areas of existing employment where planned intensification of employment use is to be concentrated. Notwithstanding this, because of the primary focus and priority on housing delivery, the Plan does allow for housing to be located on employment sites where the relevant conditions are met (Policy E1).

Finally, Oxford has significant green spaces, in particular the green corridors along the two major rivers, which broadly coincide with the area of Green Belt within the city. Policy S1 is explicit that new development should be directed away from locations where it would have a negative impact on the green and blue networks, public open space and the floodplain.

The approach in the spatial strategy (and the strategic policy tools that form part of it, as set out in Appendix 1.2 of the Plan [CSD.001](#)) makes provision for homes, employment, infrastructure, community facilities and protects the natural environment. The AoF and site allocation policies provide clear guidance of the scale, design and quality of strategically important areas of the city. As such we consider our approach is in accordance with paragraph 20 of the NPPF 2024.

The spatial strategy is clearly worded to ensure all users of the plan can understand and, where necessary, apply it. As is the case throughout the Plan, the supporting text is split into two sections: the policy context, i.e. the rationale for the policy, and the policy implementation, which provides an easily accessible explanation for all users of the plan. The policy wording is direct and positive e.g. “planning permission will be granted where...” reducing the potential for ambiguity. Additionally, the use of diagrams and maps help to illustrate the spatial strategy, once again, improving its accessibility for all users.

Additionally, the Plan has been constructed so that all the policies within it flow directly from the strategy and tangibly seek to deliver the strategy. As such, the Plan has a clear narrative which permeates through the whole document and each policy signposts for the user to other linked policy considerations or requirements. In this way, the strategy does not just flow downwards but is integrated throughout the plan which supports the overall vision and aids deliverability and comprehension for all users.

However, following the introduction of the new NPPF 2026 and in response to issues raised in the Regulation 19 consultation, we propose that Policy S1 should be modified in line with the Statements of Common Ground with West Oxfordshire District Council and with Sport England as set out below. (red underlined text indicates additional text; red strikethrough text indicates text to be removed):

[Amend policy title on page 10 and heading on page 9 as follows:] Spatial Strategy ~~and Presumption in Favour of Sustainable Development~~

Policy S1: Planning permission will be granted where development proposals accord with the policies of the Plan taken as a whole.

~~Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.~~

The City Council, through its policies and decisions, will positively pursue sustainable development and achieve sustainable growth in the delivery of homes, jobs and services to create a network of healthy, well-connected, high-quality areas where people want to live, play, learn and work in line with the vision and objectives of the Local Plan. To help achieve this it will aim to ensure development is located to:

~~e) Prioritise new homes in all suitable and sustainable locations;~~

~~ef) Focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere;~~

[Re-number what were criteria f, g, h, i]

~~fg) Ensure new uses are in locations where they will not harm the amenity or continued operation of existing neighbouring uses;~~

[add new criterion j:]

~~j) Support the health and wellbeing of local communities such as by delivering new sports and recreation facilities or enhancing existing provision.~~

When determining development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). ~~The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions in the city.~~

~~All new proposals for development must conform with the principles of securing sustainable development, which ensures that the city is ready for a net zero carbon future, natural resources and raw materials are used prudently and considerately, the air quality of the city is improved, and human health is safeguarded.~~

~~Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.~~

~~Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, considering whether:~~

~~i) The application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or~~

~~j) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.~~

Q2 What are the 'Areas of Focus' and how do they relate to Policy S1 and the strategy?

As set out in response to question 1 above, the spatial strategy seeks to achieve a balanced approach to the competing requirements of housing and employment. In implementing that strategy, we designed the Areas of Focus (AoF) as a locally-specific policy tool that will help deliver the spatial strategy in a tailored way to Oxford.

As the work on the plan took place, it became clear that there were clusters of potential site allocations which were sometimes co-located with Key Employment Sites, centres or adjacent to proposed development across the city's boundary. These were explored further as areas where significant changes would be anticipated over the Plan period resulting from new development - either development within the city or in combination with development adjacent to the city boundaries. These areas all have quite a scale of growth expected over the plan period, yet given the nature of Oxford this will be coming forward at different times, on separate sites, promoted by different landowners. The intention of the specific AoF policies is to ensure the scale of growth is managed effectively with a more comprehensive approach across each area, by identifying key principles in terms of design, connectivity and infrastructure. The AoF Policies align with the general policies of the plan and do not introduce any variations in the general policy approach. For example, there is no variation in the type of use permitted; this would still be expected to follow the general spatial strategy, and there are no other variations in general policy requirements.

Each of the AoF has been identified as fulfilling some important roles in the delivery of the strategy, by virtue of being:

- sustainably located, with existing good transport links and/or opportunities for significant investment in public transport connections (e.g. the Cowley Branch Line AoF). In conjunction with the City and District Centres, they are areas of the city where development is likely to be most sustainably located;
- having the potential to accommodate new development (all AoF have major development sites within them);
- deliverable during the plan period;

- an area defined by a particular character or where there is a particular focus on a specific element of strategy (e.g. the focus on institutional development in the Marston Road and Old Road AoF);
- an area where greater wider benefits can be secured through adopting a co-ordinated response (e.g. West End and Botley AoF, through looking collectively at sites within multiple landownerships/development programmes);
- able to offer potential for structural change in how the city operates (e.g. the Cowley Branch Line AoF with the re-opening of the line to passenger services);
- an area where there is potential for cross boundary benefits (e.g. the Northern Edge of Oxford AoF).

As set out in the spatial strategy, new development across the city results in additional social, community and transport infrastructure needs and the spatial strategy and AoF are an additional tool to help ensure that development in these clusters is planned comprehensively so that there are sufficient facilities to meet the needs of existing and future residents. The AoF are a key element of the spatial strategy and are included in the 'key diagram' ([CSD.001](#), p.10) as such. Collectively the AoF accommodate a large amount of growth anticipated in the Local Plan, demonstrating their importance to the strategy. 26 site allocations out of a total of 53 (49%) are located within the AoF and there is potential for the delivery of 1797 dwellings within the AoF based on the minimum numbers required in site allocations.

It is important to note that the AoF policies do not prioritise or 'focus' growth in specific areas at the expense of the rest of the city. Indeed, a city-wide approach to finding and locating site allocations has been taken and there is a wide spread of development opportunities across the whole city. Instead, they aim to maximise the potential of these clusters of sites by considering in greater detail the sensitivities and infrastructure requirements arising and planning comprehensively in each AoF. There are therefore a series of policies that focus on these areas to ensure that the growth that anticipated in these areas is sustainable. This echoes the aim of the spatial strategy to deliver balanced and sustainable growth. The AoF have some element of overlap with the City and District Centres, as well as with the Key Employment Sites, which is a reflection of the interconnectivity of the spatial strategy within the constrained city. This also aims to ensure the cumulative impacts of development are adequately considered to optimise opportunities for infrastructure delivery, high-quality design and place making.

In all cases, the AoF also each include development site allocation policies which help to anchor the site allocations within a more comprehensive place-based context and provide a clear steer on priorities, identified specific infrastructure requirements, and design guidance for each area. Consequently, we consider the AoF will add value to the traditional approach of simply setting a strategy and allocating individual policies. They provide a framework for the delivery of the spatial strategy, they will help secure additional benefits (beyond those individually linked to separate sites), they will help users of the plan and local people to understand our ambition for those areas, and encourage developers of sites to think more widely about the area they are located in when designing their schemes.

Q3 Is it sufficiently clear to users of the Plan what types of development will be permitted and where? Is the spatial strategy effective?

Yes, the plan clearly identifies what types of development will be permitted and is effective in doing so. It achieves this in a number of ways. Firstly, the spatial strategy in Policy S1 clearly sets out the key priorities for sustainable growth in the city, namely delivering homes (and in particular affordable homes), densification of existing employment sites and environmental protection. The key diagram on ([CSD.001](#), p.10) and the policies map ([CSD.007](#)) also summarise the spatial strategy to provide clarity through a visual representation of these key principles.

Policy S1 is explicit that development proposals will be considered positively and will only be refused where there is a clear reason for refusal or the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. This is important in such a constrained city with such pressures for growth. This provides users of the plan with certainty about the starting point for assessing development and is consistent with the NPPF.

There are relatively few instances where the principle of development is likely to be unacceptable in Oxford because the Plan takes a permissive and pro-growth approach, and where there are limitations, these are clearly outlined and indicated on the policies map ([CSD.007](#)) for example, GI and floodplain.

As the whole of Oxford is one urban area and settlement, there is no settlement hierarchy in the Plan, instead the Plan supports the important roles and functions of the City and District Centres as the most sustainable locations for new development and the strategy is clear about what types of development are expected and encouraged in these areas. Policies C1 (City, District and Local Centres) and C2 (Maintaining Vibrant Centres) provide additional detail for the various centres in the city.

Outside of the City and District Centres, the approach taken in the Plan is to provide detailed and specific guidance which can help users of the plan understand where development is encouraged and how it can help to deliver the overarching spatial strategy. We consider that this is necessary because Oxford is such a constrained city and having this robust approach helps to provide greater clarity and support delivery of the spatial strategy. Consequently, the Plan includes the AoF and a large number of site allocations which provide clear guidance about how developments can be delivered at a more granular and practical level.

The AoF policies provide additional detail and explicitly state the development opportunities in their respective areas. The structure of the AoF policies includes information for readers on the context and a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis for each area. The AoF policies also clearly state through numbered paragraphs the types of development that would be expected and encouraged while also, cross-referencing to other relevant policies in the Plan. This ensures that users of the Plan can easily navigate between the strategic and development management policies, so that they can be read together, holistically. This approach ensures that the key threads from the strategy for example transport

and GI, flow through and between the policies and are integrated intrinsically into the fabric of the policies, allowing users of the plan to easily interpret and understand how they apply.

Likewise, in our strategic policies we have considered, through consultation and through working with colleagues in development management, how to frame the wording to ensure it is easy to read and clear how to apply the policy in practice. For example, in relation to employment uses the spatial strategy in Policy S1 sets out at paragraph e) [note: this would become paragraph f) if the modifications suggested in Q.1 above are implemented] that development should “focus new employment development on existing sites, redeveloping and intensifying to make best use of those sites and prioritising housing elsewhere”. The strategy does not identify new employment sites, a clear indication that housing delivery has been prioritised over increasing the number of employment sites in the city.

Then in Policy E1 (Employment Strategy) greater detail is provided about how proposals for new employment generating uses and will be considered and where they are supported (i.e. within key employment sites, the City and District Centres and on existing employment sites). It also covers the circumstances under which the loss of employment floorspace will be acceptable to support housing delivery providing a clear list of instances. The AoF which contain key employment sites (e.g. CBL AoF) then highlight key considerations for development in that area e.g. there might be heritage or infrastructure requirements which have implications for how development on that key employment site could be developed.

Lastly, Chapter 8 of the Plan includes the site allocation policies which provide succinct and clear policies requirements for each of the allocated sites. The site allocations are structured so that the first sentence contains the acceptable uses for that site e.g. “Planning permission will be granted for residential development...”. Straight-forward and easily understandable language has been utilised throughout the Plan to provide clarity and certainty for all users.

In developing the Plan we have taken a ‘no stone left unturned’ approach to identifying sites and applied a relatively low threshold size for site allocation policies, subsequently we are confident that the vast majority of development (over this threshold) will be located within site allocations. For the windfall sites, we consider that the policies are sufficiently clear for users and policies include cross references to themed chapters to further aid in the application of the plan as a whole. All of the strategic approaches are aligned and harmonious so as not to cause conflicts when applied to proposed developments and together will deliver the strategy.

The strategy identifies the need to protect the Green Infrastructure Network, which is clearly shown on the policies map. Policy G1 (Protection of Green Infrastructure) categorises the types of GI and the relevant protections afforded to core, supporting and ‘other’ green spaces. Where site allocations may impact on the GI network, those policies have been written to provide detail about how this consideration or potential conflict should be addressed and/or resolved.

The City Council considers that the Plan’s spatial strategy is and will be effective by utilising a combination of detail and flexibility to ensure it is deliverable in a complex city like Oxford. The testing undertaken from the SA ([CSD.004a](#)), through to the site allocation capacity assessments ([CAP.001–CAP.053](#)), demonstrates a robust approach to ensuring the Plan is deliverable between 2025-2045. Additionally, the spatial strategy was developed with consideration about how the proposed growth would be delivered in adjoining planning

authorities. Section 2 of the Cooperation Statement ([COM.001](#)) outlines how the City Council has undertaken effective joint working on cross-boundary strategic matters to ensure that these are dealt with promptly rather than deferred. The SoCGs with the neighbouring district authorities ([COM.004–COM.018](#)) set out the agreed positions on strategic matters including housing needs and employment needs to support the efficacy of the Plan. The strategy provides clear guidance which is built upon at every level of the Plan which shapes proposals for development and, critically, supports the vision of housing delivery and growth in a tangible and deliverable way.

Q4 How does the spatial strategy reflect strategic decisions around the provision of new infrastructure, ensuring that new development is supported by the necessary infrastructure and facilities?

The Infrastructure Delivery Plan (IDP) ([CSD.006](#)) provides a summary of infrastructure needs across Oxford and sets out the infrastructure schemes to meet the needs, taking into consideration the level of housing and employment growth over the Plan period. We have taken a proactive approach to the structure of the IDP by dividing the city into four quadrants to make it easier to understand the component parts of key infrastructure as well as their collective impact on the city. Where Oxford is a constrained city, this approach is necessary to ensure that infrastructure is considered more comprehensively than just the city level, and that it is directed into specific areas that have been identified with existing or projected infrastructure needs. The quadrant approach therefore ensures that infrastructure is co-located with the City and District Centres and the AoF. The AoF relate to the IDP quadrants as follows:

- North Infrastructure Area quadrant includes the Northern Edge of Oxford AoF, and North Area proposed development sites;
- South Infrastructure Area quadrant includes the Cowley Branch Line AoF, and South Area proposed development sites;
- East Infrastructure Area quadrant includes the Marston Road and Old Road AoF, and East Area proposed development sites; and
- West and Central Infrastructure Area quadrants containing the North of the City Centre AoF, West End and Botley Road AoF, and West and Central Area proposed development sites.

By aligning the AoF and the IDP, the plan can ensure that contributions towards key infrastructure projects are clearly identified in the AoF and site allocation policies.

Policy S3 has been included in the Plan to set out how infrastructure should be delivered in new development. Policy S3 aims to ensure that essential infrastructure needs, to facilitate new development, are provided for and helps to ensure the plans proposals do not have adverse impacts related to these needs not being met. The approach is that planning permission will be granted where the required level of supporting infrastructure is met, which can be determined on a case-by-case basis. For infrastructure identified in the IDP (or in specific negotiations on an application) either on-site provision or contributions secured through s106/ s278

agreements or CIL will be required, as well as other identified sources of funding set out in the IDP. Additionally, where critical infrastructure has been identified, this must be completed prior to approval of an application or where the LPA is content that it will be completed within a reasonable timeframe. This approach ensures that critical infrastructure is delivered in a timely manner and is able to support the development and growth proposed through the spatial strategy.

None of the development within the site allocations, or the overall spatial strategy, would be dependent on new or upgraded infrastructure in order to come forward. The IDP does identify 'critical infrastructure' but this relates exclusively to utilities upgrades, for example upgrades to substations and the delivery of the Oxford Flood Alleviation Scheme (OFAS). If this critical infrastructure was not delivered it would have the potential to delay development across the city (and more widely), however, as the Oxfordshire Infrastructure Strategy (OxIS) ([EXAM.001a](#)) supports a shared understanding of infrastructure constraints and planned upgrades across the county, as well as what infrastructure upgrades are needed and deliverable in order to achieve growth (see also: Matter 2/Issue3/Q.1).

Following the introduction of the new NPPF 2026, to ensure that the policy is effective and in response to issues raised in the Regulation 19 consultation, we propose that Policy S3 should be modified in line with the Statements of Common Ground with Oxfordshire County Council and South Oxfordshire and Vale of White Horse District Councils as follows (red underlined text indicates additional text; red strikethrough text indicates text to be removed):

[Amendment to final paragraph of policy as follows:] ... Supporting existing public transport and the reopening of the Cowley Branch Line to passengers would enable a reduction in car use to this area. Financial contributions from new trip-generating development within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) will be expected in order to achieve public transport enhancements in this area, including, amongst other sustainable transport measures, the delivery of the CBL.

Of particular importance are the enhancements to rail infrastructure at Oxford Railway Station and the Cowley Branch Line. Policy S3 considers that these are critical to improving the accessibility and connectivity of sites, thus unlocking potential for further sustainable growth which is fundamental to the overarching strategy. We consider that these rail infrastructure improvements will be transformative for the city and are critical for unlocking the levels of growth that are outlined in the spatial strategy. This is also why we have chosen to use the AoF and site allocation policies to include specific, detailed guidance to support the delivery of key infrastructure projects. This is demonstrated in Policy CBLaOF where paragraphs a)-e) explicitly support active travel and infrastructure delivery. The policy also clearly cross-references to strategic policies (i.e. Policy C8) and site allocation policies (Policies SPS12 and SPS15) to create a continuity and golden thread at all levels of policy implementation.

Policy S3 also commits the Council to continuing to work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. We are committed to doing everything we can with service providers to facilitate the delivery of infrastructure and collaboration between

the LPA and Thames Water, the Environment Agency, Network Rail, Oxfordshire County Council, has taken place to inform the development of the plan and to ensure that projects identified in the IDP, such as Oxford Flood Alleviation Scheme (OFAS), Oxford Railway Station/ Cowley Branch Line and the LCWIP are deliverable and planned for. The extent of our collaborative engagement can be seen through the numerous Statements of Common Ground (SoCG) with all key infrastructure providers/ stakeholders ([COM.004-COM.018](#)).

Notwithstanding this, we are aware that there will be instances where LPA engagement is not sufficient in isolation which is why engagement by developers with key stakeholders is required by the policy for the same purpose. Where the need for contributions has been identified we believe this should be fair, which is why we have a clear methodology about how we will seek contributions ([CSD.006](#)). This can also be seen for example within the CBLAOF policy where the development of the CBL contribution buffer zone is included so that developments which cause infrastructure requirements fairly contribute towards it.

We have established, through significant testing, that the level and pattern of growth identified in the strategy is achievable ([CSD004a](#)) and we are confident that all the necessary infrastructure can be provided, not least because some of these are already underway and we have secured contributions towards their delivery. This can be seen for example through OFAS which is now at an advanced stage and CBL which has already secured a significant proportion of funding towards its delivery. We consider the deliverability of the strategy to be the key measure of success and are confident in our approach.

Q5 Does the spatial strategy reflect growth proposed in adjoining local planning authorities and how has a collaborative approach been taken to developments coming forward around Oxford?

Yes, in developing the spatial strategy consideration was given to the growth proposed in adjoining planning authorities. The Cooperation Statement ([COM.001](#)) details in paragraph 2.1 the strategic matters which the City Council considers to cross administrative boundaries. These are:

- Housing need and supply
- Economy and employment
- Infrastructure provision and Cowley Branch Line
- Environment and climate change

Given Oxford's tight administrative boundary, development, by necessity, is built and planned up to the boundary of the city. As such, we are cognisant of development plans which fall outside of our boundary.

Likewise, as a result of our unmet housing need, we have had extensive conversations with our neighbouring authorities about where, and how, that need will be delivered. Although it is for the respective authorities to set their own strategies for growth, it has long been an agreed approach between the Oxfordshire authorities that development contributing towards Oxford's unmet need should be located in close physical proximity to, or well connected to, the city.

Subsequently there are development locations such as PR6a and PR6b in Cherwell which are in close proximity to the Northern Edge of Oxford AoF, and the Land South of Grenoble Road (AS3/STRAT11) in South Oxfordshire which are in close proximity to the CBL AoF. While co-locating the AoF and unmet need sites was not the primary reason for the location of the AoF (see Issue 1, Q2, above), it was an element that was taken into account. Furthermore, the interconnectivity of sites inside and outside of the city boundary has been written into the AoF policies, for example Policy NEOAOF at paragraph b) requires increased connectivity and permeability to site allocations adjacent to the city which are in Cherwell District (PR6a Land East of Oxford Road, and PR6b Land West of Oxford Road and PR6c Land at Frieze Farm,) and West Oxfordshire.

In developing site policies which are located in close proximity to, our boundaries we have sought to work collaboratively with our neighbouring authorities, for example sharing the draft policies in December 2025 ahead of the Regulation 19 publication in addition to the maintaining effective co-operation more generally and our unmet housing need. In proactively orchestrating these conversations we have made sure that we are identifying and capitalising on opportunities that arise from boundary adjacent or cross-boundary development. In particular, making sure that developments which are adjacent to the boundary are well connected and adhere to good placemaking principles. Details of these meetings can be found in Table 1 of [COM.001](#) which includes the monthly Oxfordshire Planning Policy Officers Meetings (OPPO) and Development Plan Co-operation Forum Meetings (DPC).

Collaborative working has also been progressing on development proposals which are adjacent to the city through our involvement on pre-application discussions and live planning applications for the unmet housing need sites. City Council officers have helped to inform discussions about the level of financial contributions required from sites such as AS5 Land North of Bayswater Brook in South Oxfordshire (STRAT13 in the South Oxfordshire District Plan 2035) as well as working with Cherwell on producing their development briefs for unmet housing need sites.

We have also worked in conjunction with our neighbouring authorities, the County Council and statutory undertakers and agencies such as Thames Water and the Environment Agency to ameliorate barriers to growth. This was demonstrated, for example, when collaborative working by those aforementioned groups resulted in the formulation of a plan to resolve issues with sewage treatment works capacity in Oxfordshire, which otherwise would have significantly impacted on housing and commercial delivery for the foreseeable future. A range of prescribed bodies including the County Council, neighbouring authorities and the Environment Agency have inputted into framing the policies and proposals of the Local Plan in this regard. Statements of Common Ground with these bodies (see: [COM.007](#), Oxfordshire County Council and [COM.008](#) Environment Agency) demonstrate that collaboration has helped resolve this difficult issue. Updates to the Infrastructure Delivery Plan (IDP) ([CSD.006](#)) reflect the discussions that have taken place and the conclusions drawn in relation to utilities infrastructure needs and delivery.

Managing economic growth and ensuring that the city can continue to play its role in the local and national economy has also been a key consideration when developing the Plan. Oxford is a city of considerable international importance in a range of economic sectors and as such there

are considerable added value benefits for the overall national economy, which go far beyond the benefits of other cities of a similar size in the United Kingdom. The Strategic Economic Plan 2023-2033 (SEP) (OxLEP) ([ECON.004](#)) is a statement of the economic priorities for Oxfordshire, with the aim of championing good, sustainable growth. However, Oxford's reach as a location to work goes beyond the Oxfordshire authorities, and cooperation with a wide range of other local authorities and other bodies occurs through meetings relating to the Oxford-Cambridge Partnership. Additionally, the City Council has been working closely with the Oxford Growth Commission (OGC) which has provided an additional mechanism for collaborative working across administrative boundaries. The need for the City, County and District collaboration was a feature of the OGC's Interim Report 2025 ([LINK](#)). As such, collaboration is something which the City Council has always endeavoured to incorporate into its approach, both because this is good practice, but also because the constraints of the city boundaries make the alternative a suboptimal approach to planning for growth and development.

Planning for strategic transport infrastructure requires cross boundary cooperation and is a strategic matter. This collaborative approach can also therefore be seen through our proposals regarding regional transport, for example the delivery of the Oxford Railway improvement works and reinstatement of passenger services on the CBL which require input from the Office of Rail and Road, Oxfordshire County Council and South Oxfordshire and Vale of White Horse. Statements of Common Ground have been produced with Network Rail, East West Rail, Oxfordshire County Council, South Oxfordshire and Vale of White Horse District Councils and National Highways which demonstrate our collaborative approach.

Additional information about collaboration during the consultation process is also included in responses to Matter 1/Issue 2.

Issue 2 – Core Green Infrastructure Network – Policy G1

Q1 Is the identification of Core Green Infrastructure justified and consistent with national planning policy?

Green infrastructure (GI), particularly open spaces, plays a vital role in supporting health and wellbeing of Oxford's people and the wider natural environment, with the [Green Infrastructure study \(GRE.001\)](#) identifying the multi-functional benefits it provides. In a space constrained city such as Oxford, with various competing pressures on land, protecting green infrastructure appropriately whilst balancing other needs like delivering new housing is important for ensuring sustainable growth. Protection and enhancement of the GI network is therefore a key objective of the Local Plan and contributes to achieving various other objectives underpinning the vision.

National policy through the NPPF (2024) identifies that Local Plans should include strategic policies for the conservation/enhancement of the natural environment including green infrastructure (para 20). It also sets out that plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (para 188).

It is within this context that the Local Plan, through Policy G1, therefore designates a green infrastructure network made up of a variety of types of open spaces and establishes a hierarchy with different levels of protection to these spaces based on their various local benefits. Whilst the Council considered a range of options for what a policy could look like as part of the Preferred Options consultation (see Appendix A of [BGP.001e](#)), it was determined that this tiered approach to protection, through core and supporting levels, was the most effective way of achieving the Local Plan's strategy. It responds to the reality that the Local Plan cannot protect every open space completely, and instead implements a varying level of protection that is informed by local context and the types of functional benefits each space provides with:

- strongest protection assigned to spaces where location is fundamental to the benefit(s) they provide and to supporting the functioning of the wider network and addressing wider sustainability issues (core spaces).
- a more flexible level of protection assigned to areas where location is not as fundamental to the benefits, which would allow for redevelopment where loss/harm is sufficiently mitigated through re-provision elsewhere in the network (supporting spaces).

The core space protection reflects the fact that certain types of benefit (though potentially not all) are tied to the existing context of the space, as well as the spaces being fundamental to ensuring a network of multifunctional Green Infrastructure is protected across the city. This means that, if the space were to be developed, those functional benefits cannot be recreated elsewhere easily. Whilst there is a pressing need for land to meet other uses like housing, the loss of the benefits that the core spaces provide is much harder to mitigate effectively compared to where harm/loss occurred on supporting spaces (where the benefits are more easily re-provided).

In assigning spaces to either the core or supporting tier, the City Council considered a range of sources of evidence. The starting point was the [Green Infrastructure study \(GRE.001\)](#) which was comprised of a quantitative and qualitative assessment of open spaces in Oxford, with

associated mapping – *although this did not distinguish sites into any particular hierarchy in of itself*. The outputs of this work, particularly mapping and data tables assessing all the sites, were updated and supplemented further by officers, particularly as the original study was prepared for the withdrawn Local Plan 2040.

As set out in Section 5 of the Green Infrastructure Background Paper ([BGP.001e](#)), particular criteria were used for designating spaces to the core network. Some green space typologies were automatically assigned to the core parts of the network because they provide a clear role or set of functions/benefits that other typologies could not and in a location that would be very challenging or impossible to reprovide in the short term. These typologies included:

- allotments for their role in food growing and social interaction, particularly valuable for those without private gardens (also protected through additional national legislation).
- churchyards/cemeteries because of their important setting for heritage assets and burial spaces.
- designated ecological sites protected under a local or national designation due to their specific ecological value for the habitats in these areas to supporting biodiversity.
- destination parks, due to the range of features that they provide for the local area, as well as a selection of additional parks in areas identified as being part of a limited offer of alternative green spaces in areas of significant deprivation.

A more nuanced approach was needed for other spaces not falling into the above categories. These were therefore reviewed for any location-specific functions and benefits which align particularly with national and local objectives in relation to topics like biodiversity, heritage conservation and climate resilience, and were allocated to the core spaces category using the following criteria:

- Biodiversity – has the space been identified as containing a significant amount of core habitat (more than 50% of the site) within the Oxfordshire Nature Recovery Network and is it also connected to other spaces and clearly forming part of a wider wildlife corridor through the city?
- Heritage – is it a Registered Park and Garden or has the space been identified on the Oxford Heritage Asset Register as a local green feature of significance?
- Climate change – has the space been identified as containing a significant amount of land within flood zone 3b (more than 50% of the site) and therefore acting as important flood storage?

For clarity and transparency, Appendix B of the Background Paper contains a list of all the designated Core Spaces under Policy G1, setting out the open space typology, and designation criteria met by the space, with additional contextual notes where required. Where spaces did not meet the above criteria, they were either designated to the supporting tier, or not assigned with additional local standards through the plan (i.e. protection defers to national policy alone).

The approach to designating a network of Core (and Supporting) spaces is considered to be a reasonable and pragmatic way of responding to the need for balancing growth in a constrained nature of the city. It recognizes that all spaces identified within the GI network offer some range of functional benefits to Oxford's people and the environment, but that they cannot all be

protected entirely when there are other competing demands on land. Stronger protection is therefore assigned to the spaces where the loss is much harder to mitigate.

The methodology for designating the spaces in Policy G1's hierarchy is considered to be consistent with delivering upon the strategic approach to protecting a network of green infrastructure as required by the NPPF. The criteria used seek to ensure spaces are protected in a way that allows them to continue to support a wide range of sustainability objectives identified both through national policy as well as the Local Plan's vision such as promoting health and wellbeing; protecting and enhancing biodiversity and the historic environment; as well as meeting requirements for adapting to the effects of climate change.

Q2 How did the approach to Core Green Infrastructure (as set out in Policy G1) inform strategic decisions for growth? Is this justified, positively prepared and consistent with national planning policy?

As is set out in the response under Matter 1 (Issue 3, Question 2), rather than the Local Plan policy requirements influencing choices about the growth strategy, the policy requirements flow *from* the chosen growth strategy, taking into account Local Plan objectives and national policy. This includes the approach taken to green infrastructure protection as embedded into the hierarchy in Policy G1.

That being said, a significant proportion of the Policy G1's core spaces are areas with insurmountable constraints which significantly impact any growth strategy regardless of local policy due to their protection under national legislation/policy – such as being within the functional floodplain (more than 50% Flood Zone 3b); nationally designated ecological sites (the SAC, the SSSIs); or nationally designated heritage protections (Registered Parks and Gardens). With or without the specifics of Policy G1 being known, these insurmountable constraints were important contextual factors limiting identification of reasonable alternatives for the overarching growth strategy and were of relevance to the appraisal of alternatives including the subsequent identification of the preferred option for the strategy.

Under the chosen growth strategy—a balanced approach to growth, prioritising housing whilst also seeking to meet wider Local Plan objectives—it was envisaged that the Local Plan's policies would enable select greenfield sites (e.g. those of lower quality) to come forward for development, whilst also protecting a strong hierarchy of green and blue spaces that perform important functions. The green infrastructure policy therefore needed to set an appropriate framework of protection that provided clarity on what sites the Local Plan would seek to protect most strongly (i.e. core spaces), as well as sites where development might be more acceptable, with expectations for how any impacts (i.e. harm or loss) should be addressed.

With the high-level growth strategy as a guide, options for the specific requirements in Policy G1 were considered through the optioneering that informed the preferred options consultation and these are set out in Appendix A of the Green Infrastructure background paper 005a ([BGP.001e](#)). These included options like: affording the same level of strong protection to all spaces within the network; having varying levels of protection in a hierarchy; or protecting only larger

'strategic' green spaces. The approach taken forward and resulting in the core/supporting hierarchy was an amalgam of several options.

Whilst the above illustrates how it was the chosen growth strategy that informed the broad approach within Policy G1, the policy's requirements did then have an influence in strategic decisions that helped shape the emerging Local Plan and how it implemented the growth strategy in other ways. In particular, this was with respect to determining the capacity for the city to accommodate its housing need.

For example, the Green Infrastructure (GI) network designations form one of several considerations taken into account in the assessment of sites for housing through the Strategic Housing Land Availability Assessment (SHLAA) 2026 ([HEA.004a](#)), which then informs the housing capacity figure and the housing requirement in the Local Plan (which is capacity based).

Following the housing focused approach of the growth strategy, the SHLAA casts the net as widely as possible to explore all reasonable opportunities for housing development in Oxford. Sites identified from a wide range of sources are fed into the SHLAA's assessment process to be considered for housing potential and then subject to a filtering process to refine the list in order to determine suitability for a site allocation.

As [BGP.002](#) documents, the initial steps in that filtering process resulted in some sites not being considered further because of known intrinsic/insurmountable physical/environmental constraints (which can often overlap with some of the core spaces as mentioned earlier). Many other green spaces were still included in the assessment, including Green Belt sites and locally designated wildlife sites. These 'policy' constraints were identified in Table A, but rather than being ruled out outright they were still assessed to weigh up the balance ([HEA.004a](#)) (see response to Matter 2, Issue 2, Q3 for more details).

Additionally, whilst the core designation involves strong protection for the spaces with functions that the City Council considers are most important to retain in situ, it helps to support the balanced growth strategy by also potentially allowing development on other parts of the network, if it is justified and mitigated in accordance with the policy requirements. In this way, the policy requirements have also shaped the strategic approach by unlocking sites that still have important green infrastructure functions because they provide a clear and proportionate means for mitigating the harm that would arise otherwise. For particular site allocations identified within the supporting GI network, the capacity assessments have typically factored in mitigation in line with requirements of policy G1, and the allocation wording includes guidance for how negative effects from the harm/loss of the GI functions in the space can be mitigated to provide clarity to applicants in order to enable the development to come forward.

In summary, whilst the hierarchy in Policy G1 was a necessary response to the chosen growth strategy's balanced approach, the designation of core and supporting spaces had an influence on strategic decisions which helped implement the growth strategy, particularly in how the capacity for housing in the city was informed and how site allocations were ultimately identified.

The City Council considers that this is consistent with the policies of the NPPF including aligning with paragraph 15's requirements for plans to provide a framework for meeting housing needs and addressing other priorities including environmental ones. It also meets the requirements for the conservation/enhancement of the natural environment including green infrastructure (para 20) and for taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (para 188). The approach is also considered to be both positively prepared and justified in that it is considered to be the most appropriate response to the city's challengingly constrained local context and the competing demands on limited land available. It enables the Local Plan to protect a network of spaces of particular importance for the range of benefits they provide, including ones which would be highly challenging to reprovide, whilst enabling other parts of the GI network to potentially come forward for redevelopment where necessary.

Q3 Is the approach to restricting all forms of development affecting Core Green Infrastructure justified?

The responses under questions 1 and 2 discussed the process that led to the identification of core (and supporting) spaces in the hierarchy of Policy G1. They highlighted that there were various drivers for the approach, including Local Plan objectives and strategy as well as national policy. They also highlighted that some GI functions are considered more difficult to reprovide than others, particularly where they arise from the space's specific locational context and contribute to the multifunctionality of the space, and that this was a key driver in distinguishing between levels of protection needed.

Spaces were only designated as Core (G1A) where they met specific conditions, as discussed under Q1 of this Issue. Where spaces did not meet that criteria, they were typically designated as supporting spaces subject to some exceptions (e.g. private spaces and amenity spaces that fell below a certain size threshold and were not designated through Policy G1 at all).

Policy G1 sets out that development resulting in loss of, or harm to, the protected spaces identified as part of the Core GI would not be granted. This reflects the fact that it is considered that these spaces provide functional benefits which are highly unlikely to be able to be re-established elsewhere when they are lost due to being intrinsic to their location. This means it is unlikely that harm/loss of these functions can be mitigated through the design process.

The functions that accord open spaces with the Core space designation, as were set out under Question 1, such as providing extensive flood storage, ecological or biodiversity significance, and heritage sensitivities, would typically make the sites inherently unsuitable for development without Policy G1's influence. Indeed, a significant proportion of these areas are already nationally designated in ways which restrict the types of development that can happen there – e.g. flood zone 3b; SAC or SSSI designation, Registered Parks and Gardens.

However, aside from any particular in situ benefits identified, it is important to note that spaces in the GI network provide a wider range of benefits which Policy G1 also helps to protect (i.e. a site may qualify as core because more than 50% is in flood zone 3b meaning it plays an important flood storage role, but it may also support outdoor sports uses like pitches as well as

sensitive habitats). Indeed, many of these benefits are important for delivering on various Local Plan objectives as well as NPPF's requirements such as: supporting healthy communities, including access to open space/recreation (NPPF, para 103); minimising vulnerability/ improving resilience to climate change (NPPF, para 161); and conserving/ enhancing biodiversity (NPPF, para 187).

Additional areas that are not nationally protected which the core network encompasses include some broad typologies such as allotments, churchyards/cemeteries, and areas of notable biodiversity value, destination parks along with some smaller parks in areas identified as lacking alternative open space. For these typologies, protection in situ is also important for ensuring accessibility to a range of open spaces. This is because, despite the relatively green nature of the city, the [Green Infrastructure study \(GRE.001\)](#) identifies that access to different types of green spaces is not equal everywhere. In a highly constrained city such as Oxford, with significant competing pressures on land, it also highlights that protecting what we have is important for ensuring existing inequalities do not worsen, particularly as the opportunities for creation of new, high-quality open spaces are very limited.

Allotments, for example, provide an important location for food growing as well as socialising for mental health, and they are especially important for meeting needs of residents without access to a private garden. This is similarly the case for parks, which provide various facilities for physical recreation that are used by various parts of the community. Protecting these sites in their existing locations helps to ensure existing deficits in access are not worsened, particularly when creation of new spaces is very challenging.

As such, the City Council considers that the level of protection afforded to core spaces protecting them in situ is strongly justified in the local context of the city. Whilst assigning these sites to the supporting network (or omitting them completely), might allow some of them to come forward for other uses such as housing, it is considered that the negative impacts against the Local Plan strategy would generally outweigh the benefits significantly. Where negative impacts can be clearly mitigated on a site as part of the design process, these have been assigned to the supporting spaces network, which enables the necessary flexibility to allow development to come forward.

Nevertheless, officers are cognisant of the various comments received as part of the Regulation 19 consultation which disagree with this position and are of the view that the approach to protecting core spaces is too restrictive (see consultation statement [CSD.003 - Appendix 3](#)). Having given these comments further consideration, a potential modification has been identified which might help overcome this issue, and it should be noted that this supersedes the potential modification identified in response to the comments as part of the consultation statement document itself:

G1A: Core spaces

Planning permission will not be granted for development that would result in loss of, or harm to, the protected spaces identified as part of the Core GI Network unless the use is demonstrated to be compatible by not negatively impacting upon the particular in situ benefit(s) for which these spaces are designated; and if this is accompanied by enhancement of other parts of the

same core space; and where harm or loss to other GI functions is mitigated in accordance with G1B. These spaces are designated G1A on the policies map.

Officers consider that this potential mod would help to ensure that the policy retains a strong level of protection for core spaces that corresponds with their identified value of to the city and the need for preserving the identified benefits/functions in situ that they provide. However, the change could allow for some flexibility to enable compatible development to come forward on these spaces where it is demonstrated that it would not negatively impact on the particular in situ benefits identified. To determine this, reference would need to be made to the published rationale for designating each core site as currently presented in Appendix B of [BGP.001e](#), which could be copied into a future Technical Advice Note for easy access. The modification also sets out expectations in terms of mitigating any losses, including to other functional benefits.

Q4 Is Policy G1 justified, effective and consistent with national planning policy, especially where the reuse and redevelopment of open space is proposed?

As touched upon throughout the earlier questions, the green infrastructure network is important for supporting health and wellbeing of people and the natural environment in a variety of ways. However, whilst the core spaces are protected from any development that would result in loss or harm (subject to the potential modification identified under Q3), a more flexible approach was considered necessary for other spaces that comprise the GI network.

Besides the highest tier of protection afforded to Core Spaces (G1A), the other tiers of the hierarchy are as follows:

- **Supporting (G1B):** Spaces within the second level of the hierarchy which also play an important role in supporting the network and addressing sustainability issues; however, specific location is not as fundamental and loss could be acceptable where this is reprovided elsewhere in the network.
- **All other spaces (G1C):** Not identified through policy G1 and do not have additional protections applied on them via the Local Plan. Applications would defer to the protections which already exist through national policy – e.g. meeting the tests for loss of open space as set out in the NPPF. *As all other spaces are not addressed by Policy G1 and rely on national policy requirements, these are not discussed further.*

The starting point, when considering applications impacting supporting spaces, as with core spaces, would be to resist their loss, as they still play an important role in enhancing the wider network and supporting health and wellbeing of the city in accordance with the NPPF (e.g. paras 103, 161). The expectation for supporting spaces, however, is that harm/loss can potentially be mitigated through reprovision to another part of the network where necessary, as the functions are typically less location-specific, and this can mean development may be deemed to be acceptable.

There is a certain level of flexibility with how this reprovion can be approached, and this will be highly dependent on the spaces being affected and the types of functions that are being harmed/lost. The policy's supporting text is clear that this could entail either quantitative reprovion (e.g. like for like space being created) or qualitative improvements (e.g. enhancement of the quality of another part of the network).

The allowance for quantitative or qualitative improvements is considered to be a pragmatic response to the constrained nature of much of the city and the fact that there may not feasibly be room to create a like-for-like replacement somewhere else if developing on a supporting space. Instead, another option is to undertake qualitative improvements, for example, enhancing areas of lower quality grassland with improved planting to build resilience to climate change; or where play equipment is lost in one area it could be improved somewhere else to accommodate additional demands; or the facilities supporting a playing pitch could be enhanced to improve year-round functionality.

Because the supporting spaces in the network can include a range of typologies and functions, Policy G1 also sets out some additional considerations where proposals impact particular types of space such as outdoor sports sites or parks/amenity greenspaces. This includes that proposals are informed by a range of information sources such as the green infrastructure study, playing pitch strategy, local contextual info etc. The approach ensures alignment with national policy requirements with respect to assessing local needs for recreational open spaces, and the circumstances by which their loss may be mitigated by enhancement or reprovion (NPPF para 104), and also that reprovion is appropriately tailored to local context.

Ultimately, the Local Plan's strategy is to support the delivery of new housing alongside balancing wider Local Plan objectives, including protecting and enhancing the natural environment. Whilst Policy G1 sets out a strong hierarchy of protection for green infrastructure, and particular restrictions upon core spaces as part of that, the provisions in the policy for supporting spaces as outlined above provide a clear route by which proposals could come forward on some parts of the GI network where these are accompanied by appropriate mitigation in the form of reprovion. This approach would enable potentially lower quality sites to contribute to other needs such as housing whilst ensuring that negative sustainability impacts arising from development are addressed.

It is therefore considered that, as a whole, the approach within Policy G1 is a pragmatic and proportionate one in terms of helping the Local Plan to balance development needs whilst also maintaining the integrity of the overall GI network. It is justified, effective and consistent with national policy, reflecting both Local Plan objectives and NPPF expectations in relation to planning for green infrastructure alongside other identified needs.

Issue 3 – Green Belt Review

National planning policy states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of Plans.

Paragraph 146 of the Framework states that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with policies in the Framework and propose alterations to meet needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

Q1 Having established the minimum housing need over the plan period, and the likely capacity of sites to meet that need, how did the Council approach reviewing Green Belt boundaries?

Having established the minimum housing need over the plan period, the City Council then turned to considering likely capacity of sites to meeting that need. Alongside this, and as part of this capacity consideration, sites in the Green Belt were considered.

At Regulation 18, the preferred option was to have a housing requirement based on the identified capacity, in acknowledgement that the minimum housing need identified by use of the Standard Method was likely to be greater than the potential capacity of the city. This is explained in Table 1 and its related text in Background Paper 001: Housing Need, Requirement and Mix ([BGP.001a](#)). Whilst it could not be certain at that point, the City Council had a relatively up-to-date HELAA and continuously carries out monitoring of housing delivery and calls for sites. It was incredibly likely from the outset that there would be both a justification to look at opportunities in the Green Belt, and a requirement to look at Green Belt in order to meet the expectation in paragraph 146 of the NPPF, which says the Green Belt should be reviewed where there are unmet needs.

Whilst a growth scenario considered boosting greenfield supply to meet capacity was considered and tested, the selected growth option was a balanced approach (as set out in the Sustainability Appraisal). Within this scenario, development on greenfield sites would not be precluded, but core green infrastructure such as functional floodplain and wildlife sites would be protected. Nevertheless, to explore the potential of this scenario as thoroughly as possible, the first filtering of Green Belt parcels only filtered out parcels with an intrinsic value that would represent an insurmountable constraint on development. This is shown in Appendix 1 of Background Paper 006: Green Belt ([BGP.001g](#)), which lists all Green Belt parcels and shows which were filtered out of further consideration and why. These insurmountable constraints on development were taken to be if there was national-level biodiversity interest (SSSIs and the SAC) (unless that was only a small part of the parcel) and if there was functional floodplain (greenfield Flood Zone 3b) on more than half the site or where located in a way that would realistically prevent development.

All the sites that passed through this first stage of filtering were considered in the Green Belt Assessment of Additional Sites (LUC, 2025, [GRE.013a](#)) for their contribution to the Green Belt purposes. Some of these sites had been considered in previous iterations of the Green Belt assessment (Green Belt Assessment of Additional Sites 2023 ([GRE.013b](#)) and the Oxford City Green Belt Study Addendum 2017 ([GRE.013c](#)), which informed the adopted Oxford Local Plan 2036 and which itself built on the Oxfordshire-wide Oxford Green Belt Study 2015 ([GRE.013e](#))), however the assessments were all reconsidered in light of the updates to the NPPF and to the methodology for Green Belt assessment as newly set out in the PPG.

The table in Appendix 1 of [BGP.001g](#) shows in dark green the parcels that had previously been assessed, and in lighter green the parcels that had not previously been assessed but which were taken forward to be looked at in the Green Belt Assessment of Additional Sites ([GRE.013a](#)). The other parcels have insurmountable constraints (shown in orange), or were not taken forward for assessment of their Green Belt function for other specific reasons as noted in the boxes are highlighted yellow. There are very few parcels that fall into this 'yellow' category. The majority are parcels that were not filtered into the further assessment initially because of the extent of greenfield Flood Zone 3, but where updated flood risk mapping had reduced the amount of Flood Zone 3b such that it would not have been filtered out. As a check, these yellow parcels were also reconsidered in case they ought to be added for later assessment, however, none were considered to be areas with development potential which ought to be added into the Green Belt assessment at that late stage, for the reasons explained within Appendix 1 of [BGP.001g](#) (e.g. there was no known landowner interest, or being an isolated site without suitable access potential).

The Green Belt Assessment of Additional Sites 2025 ([GRE.013a](#)) sets out the methodology used for assessing the Green Belt parcels that passed through the first filtering process, and shows the outcomes of this assessment. For each parcel, this assessment considered its role against each Green Belt purpose A-E, and whether development of the parcel would have the potential to fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. Those sites that had been previously assessed were reconsidered in terms of their contribution to the purposes, and a conclusion drawn as to whether they may be considered to be grey belt (see Q2 for an explanation of the methodology used to define grey belt) or if development could fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

Following this assessment against the Green Belt purposes (which did not result in any further filtering), the next step in considering Green Belt Review was to assess the parcels against the plan strategy. Appendix 2 of [BGP.001g](#) shows the parcels considered and the outcomes of this assessment. Where development of a parcel would be contrary to the plan's strategy, further consideration was not given to whether that area of Green Belt should be reviewed. This largely applied to sites in the Core Infrastructure Network that did not have an insurmountable constraint on development (i.e. SSSI or functional floodplain), but which should still be protected from development. At this stage multifunctional and important green spaces such as Oxford City Wildlife Sites, Local Wildlife Sites, allotments, and important parks such as Cutteslowe and University Parks were eliminated from further consideration.

At this point, a number of parcels still had development potential, and the next step was to investigate the component sites uses, leases and landowner intentions. At this point, parcels where it had been concluded that development could potentially have a fundamental impact on the Green Belt purposes, were still given further consideration. This is because it could be the case that sensitive development well placed within the parcel could happen without having a fundamental impact on the Green Belt purposes (although as it turned out, there were no sites with potentially fundamental impacts that were found to have development potential).

Parcels looked at further after application of the spatial strategy were 25, 112a2, 112b2, 112b4, 112b5, 112b6, 114, 114a, 1114c, 118, 136, 151, 157, 159, 166, 178, 188, 189, 251, 298, 431, 489, and 636. The majority of these are owned by the Oxford Preservation Trust (OPT), which were approached and confirmed their intention is to protect them from development, and also Oxford City Council, its sites mainly being leased out for sports use with no intent to end the leases or change use.

At the end of this process, four sites were identified within four parcels that had development potential and therefore potentially a Green Belt review. Only one of these was eventually put forward as an allocation (114e). This is explained further in response to Issue 3 Q4.

Q2 Was the process of assessing land parcels sufficiently clear and robust, and did it follow the guidance set out in the PPG?

Due to the unmet housing need that was identified as highly likely to arise through the preparation of the Local Plan 2045, Oxford City Council commissioned Land Use Consultants (LUC) to undertake the Green Belt Assessment of Additional Sites ([GRE.013a](#)) published in December 2025, in order to inform a potential review of the Green Belt boundaries. This work also included a reassessment of parcels previously assessed in the Green Belt Assessment of Additional Sites 2023 ([GRE.013b](#)) and the Oxford City Green Belt Study Addendum 2017 ([GRE.013c](#)), which informed the adopted Oxford Local Plan 2036 and which itself built on the Oxfordshire-wide Oxford Green Belt Study 2015 ([GRE.013e](#)).

Parcels assessed in the previous studies noted above were reviewed in addition to the full assessment of parcels not previously assessed. Paragraph 004 (ID: 64-004-20250225) of the [PPG](#) outlines principles for delineating parcels of Green Belt to be assessed. The PPG emphasises that assessment areas (parcels) should be 'sufficiently granular' to capture the variable contribution to Green Belt purposes across an area; it suggests that numerous smaller parcels are preferable to few larger ones, and that parcel sizes should consider local circumstances such as existing settlements. The assessment parcels were therefore subdivided where suitable to reflect variation in contribution to the purposes, where this did not result in a parcel smaller than 1 ha.

For clarity in the process of assessing land parcels, a two-stage approach was applied. In the first stage, it was assessed as to whether any land parcels could be identified as grey belt. The PPG names identifying grey belt land as a key purpose of performing a Green Belt review. The second stage involved land parcels being assessed to ascertain if their release or development

could fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt. This is in accord with Paragraph 003 (ID: 64-003-20250225) of the PPG.

Stage 1: Identifying grey belt land

Paragraph 007 (ID: 64-007-20250225) of the PPG states that land can be identified as grey belt if it does not strongly contribute to Green Belt Purposes A, B or D, and where the application of policies in footnote 7 of the NPPF (other than Green Belt) do not provide a strong reason to refuse development.

In line with Paragraph 005 (ID: 64-005-20250225) of the PPG, the new methodology employed by LUC in the 2025 assessment involved assessing the strength of contribution by each land parcel to the purposes of the Green Belt. LUC identified no parcels that contributed to purpose B (prevent merging of towns), so evaluation of purposes A and D were relevant to identifying grey belt. Parcels were considered for the features specified in Paragraph 005 of the PPG as contributing to the relevant purposes. Clear operational definitions for terms used were also laid out.

Paragraph 006 (ID: 64-006-20250225) specifies that grey belt excludes land where a strong reason for refusing development applies pertaining to footnote 7 of the NPPF (other than Green Belt). These reasons may concern, but are not limited to, habitat sites, Sites of Special Scientific Interest, Local Green Space, designated heritage assets, and areas at risk of flooding. Paragraph 006 states that land may provisionally be designated grey belt where more detailed specific proposals would be necessary to reach a judgement about footnote 7 exclusions. Therefore, to ensure robustness of the review and that provisionally grey belt land could be appropriately considered, areas where the footnote 7 exclusion could be applicable were not excluded from assessment.

Land being identified as grey belt alone is not sufficient to determine it should be allocated for development or released from the Green Belt, as stated in Paragraph 001 (ID: 64-001-20250225) of the PPG. Equally, Green Belt land excluded from the definition of grey belt cannot automatically be excluded from consideration for development. Therefore, to ensure a sufficiently robust and thorough assessment, other parts of the Green Belt which are not grey belt were considered alongside grey belt parcels (Paragraph 3.7, [BGP.001g](#)). This is especially important in the context of the unmet housing need in Oxford, as Paragraph 146 of the NPPF encourages review and alteration of Green Belt in order to meet unmet need where possible.

Stage 2: Assessing the contribution of land to wider Green Belt purposes

Paragraphs 003 (ID: 64-003-20250225) and 008 (ID: 64-008-20250225) of the PPG states that a Green Belt review should involve assessment of whether alterations to Green Belt boundaries or the development of Green Belt land could have a fundamental impact on remaining Green Belt land in the plan area and its contribution to all Green Belt purposes (taken together). Whilst it is acknowledged that this impact can be most clearly assessed where there are specific proposals for development in certain locations, the 2025 assessment sought to identify where potential exists for development to undermine Green Belt purposes. This meant identifying parcels where contribution to Green Belt purposes was greatest, then assessing the potential for development to fundamentally and meaningfully undermine the purposes.

Chapter 3 of the assessment clearly defines each of the five Green Belt purposes, including the features that characterise land fulfilling the purpose and further operational definitions of specific terms used in the NPPF and PPG to describe the purpose. Where illustrative features of land contributing to each purpose are specified in Paragraph 005 (ID: 64-005-20250225) of the PPG, these informed the features specified in the assessment. The definition of 'fundamental and meaningful impact' is also clarified in relation to each of the five Green Belt purposes, and in the Oxford context. This clarity enabled consistent and robust assessment of land parcels.

Individual site assessments include a description of the site, the components of which are set out in the methodology (Chapter 3) to establish consistency across sites and ensure alignment with the PPG (particularly Paragraph 005). This includes boundary features, landform changes, urbanising influence from outside the Green Belt, development activity increasing urbanising influence in the Green Belt, and the relationship with the wider Green Belt.

Each site was assessed for its contribution to each of the five Green Belt purposes on a scale of 'very strong', 'strong', 'moderate', or 'weak' (except for purpose E, where contribution is equal). This approach is informed by Paragraph 005 of the PPG, which delineates 'strong', 'moderate', and 'weak/none' contributions to the purposes. The review's slightly finer scale of assessment contributes to greater robustness and helped inform judgements and priorities about land use/release. Justification for the ratings given regarding each purpose was included as part of each individual site assessment, along with a clear conclusion stating whether the land is identified as grey belt and explaining whether its development would fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

Q3 How did the Council then consider the findings from the Green Belt Review in shaping the strategy and deciding which sites to allocate?

The findings of the Green Belt Assessment (in particular the Green Belt Assessment of Additional Sites 2025 (LUC, [GRE.013a](#)) were not intended to shape strategy, but were used to inform decisions about which sites to allocate.

A key paragraph of the NPPF is paragraph 146, which says that, where there are unmet needs, '...authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.' The PPG states that this judgement should focus on evaluating the effect of release or development on 'the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.'

Paragraphs 3.80-3.87 of The Green Belt Assessment of Additional Sites 2025 ([GRE.013a](#)) sets out how paragraph 146 of the NPPF has been interpreted, and paragraph 3.88 explains that the Assessment identifies parcels where Green Belt contribution is at its greatest. It notes that these areas of highest contribution were reviewed in the round to judge where there is potential for development to fundamentally and meaningfully undermine the purposes. It notes that

whether the purposes may be fundamentally undermined would depend on the exact nature of development, which at this stage is unknown.

[GRE.013a](#) provides a useful assessment of Green Belt. The detailed appraisal of parcels against purposes could have been important in informing how Green Belt boundaries should be reviewed to allow development within parcels in a way that has the least impact on the remaining Green Belt. However, it was not used to rule out any parcels from further assessment because of their Green Belt function. Even those parcels where it was identified that development could fundamentally undermine the purposes of the Green Belt were still considered for development potential, because further work could show that carefully guided development within a particular area of the parcel could potentially take place without fundamentally undermining the Green Belt purposes.

Nevertheless, ultimately only one developable site within the Green Belt was eventually identified, and this site was only part of an assessed Green Belt parcel because of landowner intentions. Whilst the whole site put forward in the call for sites on behalf of the landowner was not allocated, that was because their stated intention at the time was to use the grey belt (PDL) area of the site for development and the remainder for mitigations. Therefore, there was considered to be no need to review the Green Belt boundary to take out any more of the site than was necessary for the proposed development. The landowner has since shown interest in a wider area of the site for development (Marston Paddock Extension - SPE9).

Q4 Were areas identified as potentially suitable for release from the Green Belt, but not actively promoted for development? If so, how did the Council approach this situation in developing the Plan and seeking to meet housing needs?

Areas within the Green Belt that were potentially suitable for release were all considered further. They were considered further regardless of whether or not they had actively been promoted for development. Part of this process involved contacting landowners to let them know that Green Belt release could be considered and to try to gauge potential landowner interest.

Appendix 2 of Background Paper 006: Green Belt ([BGP.001g](#)) summarises the outcome of the Green Belt Assessment, and also how development potential was then further considered. Only at this point, after the initial filtering of parcels and once the outcomes of Green Belt Assessment were known, was the spatial strategy applied to the Green Belt parcels. 'Policy on' constraints, such as a Local Wildlife Site Designation (rather than a SSSI), did not filter out parcels from assessment, but did at this point filter them out of further consideration for development potential, because their allocation for development would be contrary to the spatial strategy and wider policy approaches of the Plan. The next step was to contact landowners of the remaining Green Belt parcels that had development potential.

The table in Appendix 2 of [BGP.001g](#) shows that, on the vast majority of potentially developable parcels, there is confirmation that the landowner has no interest in development in the short or long-term and/or is wishing to continue leasing the site for sports use. Only four Green Belt sites were identified as having potential landowner interest.

The sites with identified landowner interest and where development would not be contrary to the spatial strategy were 112a2, 112b2, 114e (which was assessed as part of parcel 114a, the majority of which is owned by Oxford Preservation Trust (OPT)). In addition, parcel 298 has multiple landowners and these confirmed no interest except Hertford College. Their sports ground was made into separate site 676 within this larger parcel. However, whilst the landowner indicated some interest in developing their sports ground for residential use, at the same time they said their primary intent for the site is to keep it in sports use, and it has not been demonstrated that the sports facilities are surplus or can be re-provided. Therefore, this site was not pursued when considering a review of the Green Belt boundaries.

Sites 112a2 and 112b2 are in the Marston Gap, west of Marston and of the new developments currently under construction on land previously released from the Green Belt through the Oxford Local Plan 2036. These sites were explored further, with Phase 1 habitat surveys undertaken, and the sites were discussed with Oxfordshire County Council as Highways Authority. The current developments underway will have access directly to Mill Lane, but there is no potential for this narrow lane to take the further increases in traffic that expanding development further to the west would entail. There is also no possibility of a direct access onto the A40. In addition, the area is remote from key facilities such as a primary school, yet would be too small to support them itself. It would therefore be car-dependent. Oxfordshire County Council was very clear they would object strongly to development on these sites, and these sites were not pursued further.

In spite of an approach that was very open to considering development potential of the Green Belt, and where this was explored thoroughly, eventually only one site with development potential was identified and has proposed alterations to the Green Belt boundary through the Oxford Local Plan 2045 process. This is site 114e (Proposed allocation Marston Paddock Extension - SPE9).

Q5 Where alterations are proposed to the Green Belt boundary, can the Council demonstrate exceptional circumstances in accordance with paragraph 147 of the Framework?

The City Council has demonstrated that it is doing all that it can to locate as much of the city's housing need as can be sustainably accommodated within the city, without resulting in detrimental impacts to the special character and historic setting, which give Oxford some of its unique qualities – qualities important to maintain in order that Oxford remains an attractive place to both live and work. However, the City Council considers that there are sufficient factors that come together to override the normal presumption that Green Belt boundaries should endure (exceptional circumstances).

The plan's approach has been to consider every potential site for development, fully utilising all potential opportunities on brownfield land. Background Paper 015 - Developing Local Plan 2045 Site Allocations ([BGP.002](#)) sets out how sites have been considered, and the Oxford Strategic Housing Land Availability Assessment (SHLAA) Report June 2026 ([HEA.004a](#)) sets out the process in more detail. The site capacity assessments for proposed allocations are based

on an assumption of high but appropriate densities, as set out in Background Paper 016: Efficient Use of Land ([BGP.003](#)). This has been a thorough and rigorous process, which is explored in greater detail elsewhere in the City Council's responses.

All opportunities to focus development on brownfield sites and maximise their capacity, and all options to accommodate need outside of the Green Belt, have been fully explored. There nevertheless remains a level of housing need that cannot be fully met within the city's boundaries. The housing need in Oxford calculated using the Government's Standard Method is 21,560 dwellings over the Plan period. The Capacity of the city is calculated in the SHLAA June 2026 ([HEA.004a](#)) as 9,041 dwellings over the Plan period. That means that, over the Plan period, there is an unmet housing need of 12,519 generated from Oxford ([CSD.009](#)).

Discussions have continued with neighbouring districts about production of the Plan. Extant plans in neighbouring districts include releases of Green Belt, with exceptional circumstances that justified their release being the need to accommodate Oxford's unmet need. Therefore, to not look at Green Belt within the city's boundaries whilst asking for unmet housing need to be accommodated in neighbouring districts, which has required Green Belt release, is not a good foundation for the unmet need discussion.

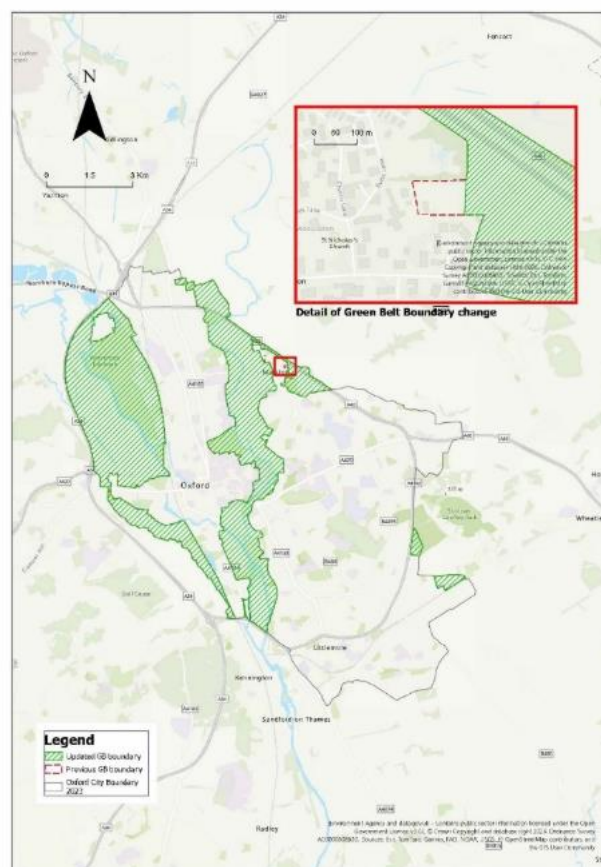


Fig 2: Oxford Green Belt with detail of proposed boundary change

The proposed amendment to the Green Belt boundary is limited to a single location and comprises of a plot that forms part of an allocated site (Marston Paddock Extension - SPE9). The proposed amendment would have very limited impact, as the site is previously developed

land and therefore considered as grey belt. The landownership extends beyond the site allocation area into greenfield which means there are opportunities for the required enhancements to open space required alongside Green Belt release.

Issue 4 – Employment Strategy – Policies E1 and 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?

This approach is consistent with the local plan growth strategy and spatial strategy of the plan. The Sustainability Appraisal ([CSD.004](#)) tested different growth strategy alternatives. These were to prioritise housing or to prioritise employment. Within those two choices, three sub-options were considered - boost brownfield supply, boost greenfield supply or balance development.

Option 1a (prioritise housing; balanced development) is the favoured growth strategy and that leads to the plan's spatial strategy. This does not mean that there is insufficient support for businesses and the economy, or that the plan's employment strategy is not sufficiently flexible. This approach is not inconsistent with paragraph 85 or 86e of the NPPF. It is anticipated that needs for land for employment-generating uses will be met in whole, with sufficient flexibility to respond to both identified and changing, unanticipated needs.

The spatial strategy for employment uses is to allow new floorspace only on existing sites, on sites in existing lawful use, and in the city centre and district centres. This is consistent with paragraph 85 of the Framework, which requires planning policies to help create the conditions in which businesses can invest, because within these locations a very significant amount of potential has been identified. The Oxford Employment Land Needs Assessment (Rapleys, 2026, [ECON.001](#)), (hereafter “the ELNA ([ECON.001](#))” includes a comprehensive supply-side assessment which looks at extant permissions and also considers the planning pipeline of current applications being considered at October 2025. This supply-side assessment shows that the identified floorspace needs for office; R&D; industrial; and; warehousing uses, can be comfortably accommodated within the city’s current employment land portfolio (focusing new employment-generating uses on the city’s Key Employment Sites, and on employment sites within the city and district centres). The potential of these locations has been identified by collecting a wide range of data, including through significant engagement with landowners and businesses.

The supporting text to Policy E1 already quantifies the employment floorspace need. Given the plan can meet its employment needs primarily through modernisation and intensification of brownfield land, there is no reason to quantify the employment floorspace need as a land requirement. Paragraphs 5.15-5.16 of the Employment and Inclusive Economy Background Paper ([BPG.001d](#)) set out why expressing employment need in terms of floorspace is particularly useful in Oxford.

To allow employment generating uses (i.e., those employment uses that fall into Use Classes E(g)/B2/B8), outside of the identified suitable locations (which are found to be sufficient to meet

identified needs) would be contrary to the growth strategy. It is an approach that would have potential negative rather than positive impacts. This is because locations outside those listed in Policy E1 are less likely to be suitable for employment-generating uses. Furthermore, it is important that different needs in the city are balanced because of the limited amount of land. If employment generating uses were to be able to come forward in any location in the city, it is likely this would significantly suppress delivery of housing. This is because some employment floorspace uses (R&D) have been found to generally add more value than housing (see [BGP.001d](#) paragraphs 4.6-4.10 for further details). The economic context of Oxford is somewhat unusual (outside of Central London), as the delivery of certain commercial floorspace typologies (i.e., research and development (R&D) related land uses), has been more profitable than other traditionally higher land value uses, such as housing. It would not be an appropriate approach to allow employment growth in all locations, especially as it is not necessary to meet identified needs. This is particularly important when, at the same time, there are unmet housing needs in the city. Allowing employment uses to proliferate in an unfettered manner across Oxford would further suppress potential housing growth. This in turn would have a negative impact on the potential for economic growth, because lack of housing will impact the successful running of businesses. Oxford has long-standing issues in relation to staff recruitment and retention (see ELNA [ECON.001](#) e.g. Paragraph 5.42 and Background Paper 004 ([BGP.001d](#) paragraphs 4.23-4.28). Supporting new homes (for which there is an identified unmet need) in the city, through a strategy that also ensures employment needs can be met, is a strategy that helps to create the conditions in which businesses can invest.

No “new” land is required to meet the city’s employment needs outside existing sites and the city and district centres. However, within these areas, there is still sufficient flexibility to meet any unanticipated needs, in accordance with paragraph 86 e) of the NPPF, which requires policies to be flexible enough to accommodate needs not anticipated in the Plan. All employment site allocations (and mixed-use site allocations containing employment uses) have been drafted in consultation with landowners/site promoters/developers to ensure a suitable range of uses for each site. This has created (and is sustaining) flexibility for the market and growth in both current and emerging sectors.

The same broad spatial strategy was applied to the extant Oxford Local Plan 2036 ([DPL.001](#)), and that has been able to accommodate, through a strategy of modernisation and intensification of existing sites, the significant demand for R&D, which was not anticipated at that time. No change in demand for manufacturing is anticipated by this plan, but it could be accommodated across the existing employment land portfolio within the city, for instance, as part of the redevelopment of sites that are likely to come forward in the plan period, such as the Unipart Site. Should the market swing significantly away from R&D and towards any of the other employment-generating land uses, within the plan period, the plan's strategy is sufficiently flexible to be able to accommodate this.

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”?

The Plan’s employment strategy articulates paragraph 86a) of the NPPF (December 2024) and sets a clear economic vision and strategy which positively and proactively encourages economic growth by supporting new employment-generating uses in the city and district centres and across the city’s network of Key Employment sites. The city’s Key Employment Sites were established using the methodology set out in Background Paper 004a – Key Employment Site Methodology ([BGP.005](#)).

Accordingly, existing employment sites that are neither located in the city or district centres, nor are Key Employment Sites (some of which benefit from a site allocation), should undertake a sequential test for the introduction of additional employment-generating uses.

Policy E1 sets out that the sequential test would apply to new (i.e., additional floorspace, over and above that which is existing) employment-generating uses that is proposed on sites in lawful use class for the proposed employment use class. Policy E1 also allows the loss of any employment site not designated as a Key Employment site, to other uses.

This approach also aligns with the NPPF paragraph 91-92 for sequential test for main town centre uses. Whilst these sites may be in a lawful use for the proposed use class, when intensifying and requiring planning permission the development could still have negative consequences, and it is important this is understood and worked through, starting with demonstrating the location is justified for the proposed use.

A modification is proposed to overcome issues raised by Oxfordshire County Council Estates and Property Team relating to this issue. The Statement of Common Ground with Oxfordshire County Council ([COM.007](#)) at Appendix A, Table A2 on page 49 sets out details of a proposed modification, which the County Council has agreed would overcome this issue.

The proposed modification, would apply to paragraph 3 of Policy E1, as agreed by both parties, is set out below for your consideration:

~~*Outside these locations:*~~

~~*On existing employment sites or those in lawful uses for the proposed employment use class, which are outside the city or district centres, and which are not designated as Key Employment Sites, proposals for regeneration and/or additional floorspace with employment generating uses will only be supported if:*~~

- ~~*a) Existing employment sites not designated as Key Employment Sites (or those in lawful employment use can only be regenerated with employment generating uses if better and more intensive use is made of the site through the redevelopment, upgrading or re-use of existing under-used buildings; and*~~

- b) ~~Proposals for additional floorspace for employment generating uses on employment sites not designated as Key Employment Sites (or those in lawful use for the proposed employment use class); outside the city and district centres must follow the sequential approach~~ is followed for new town centre uses as set out in Policy C1.

Q3 Background Paper 004a (Key Employment Sites Methodology) describes how a quantitative assessment was used, along with professional judgement, to determine if sites should be designated as Key Employment Sites. As part of this process, how and why was a score of 36 points used? and

Q4 Are the Key Employment Sites justified and was the process of designation based on appropriate available evidence?

This answer is drafted to respond to both questions 3 and 4 of Matter 3, Issue 4.

The intention of identifying Key Employment Sites was to identify sites that should have their employment function protected because of its wider value to the economy, and because the loss of these sites would be harmful to the economy. This general approach is considered justified. It is in line with the growth strategy for the Local Plan and is in alignment with Chapter 6 of the NPPF.

This approach is important to ensure needs for employment-generating uses are met. The majority of identified supply of employment land uses (see response to Matter 2, Issue 6, Q2) is expected to come forward on Key Employment Sites. Loss of these sites would not only mean that replacement would be needed just to prevent an even greater need being created than already identified, but it also means that an opportunity for intensification within an existing site would be lost.

The sites proposed to be protected as Key Employment Sites are larger sites, all of which are able to support a broad range of jobs, or occupiers; sites which make a contribution to the national, or local economy; and/ or are sites that contribute to the social value of their local area.

Background Paper 004a- Key Protected Employment Sites Methodology ([BGP.005](#)) explains that a wide range of sources were used to first compile a list of employment sites to be assessed. The site selection process is explained in Section 2- Paragraphs 2.6-2.9 discuss the application of an initial site size filter, concluding that 0.25ha was appropriate, and Paragraphs 2.4-2.5 set out the range of sources used to compile the list of employment sites assessed.

The sites identified were then assessed using a pro-forma developed in consultation with the consultant team undertaking the ELNA ([ECON.001](#)). Paragraphs 2.1-2.3 of [BGP.005](#) set out how the pro-forma was developed. This process enabled a good understanding of each employment site and the degree to which it could support a broad range of jobs and/or occupiers; contributes to the national or local economy; and/or contributes to the social value of the area.

This process involved the consideration of factors such as ownership; any vacancy or marketing evidence; site characteristics; accessibility; whether the site supports investment, growth and expansion of key sectors such as life sciences and knowledge-based industries; whether the site attracts high growth companies to Oxfordshire; whether it is located in a 'regeneration area'; and whether the site offered opportunities for small businesses, training and skills and provides a community services. The information needed to complete the pro forma was gathered by both desktop assessment and site visits.

Thus, the 'cut-off' score of 36 was neither a score that was decided upon at the beginning of the process as a meaningful threshold, nor was it a firm cut-off. At the start of the process, a clear intention was to protect the most important sites and not the least important sites. As expected, some sites stood-out at the top and bottom of the list, but for the sites in the middle, consideration had to be given to what tipped a site over into being a Key Employment Site (See Appendix 4 of [BGP.005](#) - Final scores for assessed sites).

When ordered using the scores from the pro forma and then considering sites against the factors defining a key employment site, it was noticeable that those sites that scored 36 points or more were all strongly aligned. A sense-check of sites scoring above and below 36 points, then took place. A couple of sites (Oxford North and the Unipart site) that scored 36 were considered further and are proposed as protected "Key Employment Sites". This helped to confirm that the score of 36 was a suitable threshold, as these and other sites above it had a "more positive alignment with the qualitative decision-making criteria".

If a higher "score" had been used to define a Key Employment Site, impacted sites would primarily be those supporting industrial/manufacturing uses in the city, which would then neither be protected, nor be sites where employment generating uses were automatically supported. For instance, if the cut-off was 40 then sites including MINI Plant Oxford (38), Osney Mead (38) and other sites that currently provide much-needed industrial/manufacturing/logistics jobs that support the local economy would not benefit from Key Employment Site status. If a lower score was chosen, this would have resulted in poorer quality sites being protected, which were located in residential areas or in more remote locations (e.g., Storage Yards, Binsey Lane (30 points)).

This part of the process resulted in a list of 38 sites. This was further refined by the application of a site size threshold of 2ha in the city and district centres (see explanation in paragraphs 2.26-2.45 of [BGP.005](#)). The policy approach for Key Employment Sites allows for an element of small-scale B8 use. It was considered that the larger sites within the city centre and district centres had more potential to support an element of B8 uses than the smaller ones, and that small sites within these locations could not easily support this use. Another important factor is the need for full flexibility within the city and district centres, that allows for redevelopment of the majority of employment sites in these locations for a wide mix of uses. This further refinement led to the list of 34 Key Employment Sites as set out in Appendix 3.1 of the Plan ([CSD.001](#)), and which are shown on the Policies Map ([CSD.007](#)).

Q5 Where sites did not meet the criteria for designation, how were they taken forward in the Plan? Were they considered for alternative uses?

Policy E1 applies to all existing employment sites, not just Key Employment Sites. These sites can be regenerated with employment generating uses if criteria a) and b) of Policy E1 are met. Policy E1 allows the loss to other uses, of any employment site not designated as a Key Employment site. Proposals for housing at employment sites not designated as Key Employment Sites will be supported subject to a satisfactory assessment of objectives h) to m) of Policy E1.

It is worth noting that there is a drafting error in the final paragraph of Policy E1 on page 49 ([CSD.001](#)). This paragraph should refer to objectives h) to m), rather than referring to "a satisfactory assessment of objectives c) to f)" - see Schedule of Proposed Minor Modifications ([CSD.008](#)).

The potential of these employment sites for housing was considered further. Table A of the SHLAA ([HEA.004b](#)) shows all sites assessed. Employment sites were included in this table. In the majority of cases, no interest in change of use of the site was identified.

Each of the twelve employment sites listed in paragraph 2.25 of [BGP.005](#) is considered below:

Site name	SHLAA number	Comments
79-83 Temple Road	495	Considered for housing in the SHLAA, under the name Bocardo Court, Temple Road and given the site is fully occupied and in current employment use, it was considered "not available" for housing.
AW Clarke Engineering	Not within a SHLAA site	Given the narrow width of the site and its proximity to the railway, which would necessitate the implementation of a 10m buffer, should this site, which is fully occupied, and in current employment use, come forward for redevelopment, it would not be able to accommodate the minimum number of dwellings required for assessment in the SHLAA.
Bossom's Boatyard, towing path	Within site 469	Site (vast majority of the site 469 including this specific part) in FZ3b
Cowley Marsh Depot	Site 16	Draft site allocation Policy SPS4 for residential and public open space, minimum 83 homes.
Dairy Depot, Old Abingdon Road	Site 504	Part FZ3b. In use with no indication of landowner intention to develop.
Fire Station, Rewley Road	Site 77	Active fire station. Rejected as site not expected to be developed in the plan period.

Former Builder's Yard, (Blanchfords)	Site 438	Vacant site but no landowner intention to develop identified, despite multiple attempts to contact landowner and discuss.
Harcourt House, Marston Road	Site 24	Part of draft site allocation Policy SPE3 Government Buildings and Harcourt House for mainly residential development of minimum 68 dwellings.
Salters Brothers Ltd, Meadow Lane	Within site 274	single owner occupier, flood risk (FZ3b). Small building within large greenfield site 274
Storage Yards, Binsey Lane, open storage yards, flood risk (FZ3b)	Within site 469	Site (vast majority of the site 469 including this specific part) FZ3b
Units 1-4 385 Cowley Road	N/A	Recently redeveloped as apartments
474 Cowley Road - Site allocation for housing	516	Draft site allocation Policy SPS1 for housing

The four sites listed at table 2.1 of [BGP.005](#) which were not designated as Key Employment Sites by virtue of their size and location in the city centre are further considered as follows:

- Beaver House - recent planning application for intensification of employment uses in city centre
- County Hall - recent planning application seeking the change of use to a hotel
- Island site- mixed use, site allocation as part of the Nuffield Sites (including residential)
- Oxford Town Hall, in use as Oxford City Council main offices. Listed Building

Thus three proposed site allocations on an existing employment sites include housing (SPS1 474 Cowley Road, SPE3 Harcourt House, SPS4 Cowley Marsh Depot). This is because landowner interest was identified and they were otherwise suitable.

Q6 Where the redevelopment of Key Employment Sites is concerned, what is the justification for maintaining employment uses and retaining the number of jobs in employment? How would job numbers be established and is the policy justified and effective?

Policy E1 aims to protect the function of Key Employment Sites. Development on these sites that does not result in a loss of employment floorspace is therefore considered to be acceptable. However, development resulting in the loss of floorspace in any of the employment land uses may be acceptable at Key Employment Sites, providing criteria f) and g) of Policy E1 are met. These criteria are designed to ensure that, in cases where the loss of employment floorspace is proposed that the Key Employment Site in question, continues to make a contribution to the economy.

Because Policy E1 protects a diverse range of Key Employment Sites, that cover a wide range of land use sectors (including health, education and the traditional employment land uses), it is important that any loss of floorspace at these sites, would ensure that the employment use of that specific Key Employment Site can be maintained. As set out above, Key Employment Sites, in addition to sites that support the continued delivery and supply of employment generating uses, also include teaching and academic research campuses as well as hospital campuses.

As Paragraph 2.42 of the Employment and Inclusive Economy Background Paper ([BGP.001d](#)) recognises, Oxford is a major centre for teaching hospitals and home to a number of acute and specialist medical research organisations, which link closely with healthcare research undertaken at the two universities. As such, it is important to ensure that any loss of employment floorspace at any Key Employment Site does not jeopardise its continued employment use.

It is worth noting that the plan differentiates between employment uses and employment generating uses. The glossary defines the latter as the traditional employment land uses (i.e., Use Class E(g)/B2/B8 uses). While the former, given the city's higher proportion of jobs in health and education and given the close links between these two sectors, represents a wider selection of uses classes than those covered by the "traditional" employment land use classification as defined by the phrase "employment generating uses". Policy E1 therefore seeks to ensure that any loss of employment floorspace across the city's Key Employment Site network ensures the employment use of *that* Key Employment Site is maintained. This is especially important where Key Employment Sites are delivering employment generating uses that support Oxford in meeting its identified employment floorspace needs.

Where sites involve a loss of employment floorspace relating to one of the employment generating uses at a Key Employment Site, it is important that any losses of employment floorspace would not unduly impact the ability of a Key Employment Site to continue to meet identified employment needs. This is an important element of the plan's overall strategy, not least because the plan's strategy allows the loss of any existing employment sites not designated as Key Employment Sites to other uses and supports their complete loss to housing (subject to satisfactory assessment of objectives h) to m). (See Schedule of Minor Modifications ([CSD.008](#)), which proposes a suggested correction to this minor drafting error in Policy E1).

For the spatial strategy to be applied successfully, with identified needs for employment met and the economy supported sufficiently, existing sites must meet their potential. Allowing losses of employment function would jeopardise this balanced approach and the ability for employment needs to be met within identified locations.

Criteria f) and g) apply only to Key Employment Sites, which are all sites performing successfully and with an important role. The jobs to be replaced are those at the time of the application, unless it is clear that there is a recent vacancy or under-occupancy issue that has led to a loss of jobs.

Q7 How does Policy E2 reflect the identified need for warehousing, storage and distribution in Oxford?

The ELNA ([ECON.001](#)) sets out that Oxford's identified need for warehousing, storage and distribution uses is for non-strategic warehousing. This is due to a combination of factors including a lack of available suitable sites within the city for strategic scale facilities. Strategic warehousing requires a significant amount of land, with good access to strategic transport networks, including the Strategic Road Network (SRN). The ELNA ([ECON.001](#)) describes the level of need for warehousing, storage and distribution as "modest", recognising that some of the identified need has been identified to address the low availability in the existing stock, while forecast demand for warehousing, storage and distribution uses makes up the remainder.

As discussed in more detail in Matter 2, Issue 4, Question 4, Policy E2 has been drafted to support the delivery of non-strategic warehousing, storage and distribution uses in Oxford, rather than strategic scale facilities.

<https://www.oxford.gov.uk/downloads/file/4347/econ001---oxford-city-employment-land-needs-assessment-submission-version>

One of the ways that Policy E2 supports non-strategic warehousing is by allowing warehousing, storage and distribution uses to be delivered alongside other employment generating uses at sites within the city's Key Employment Site network. The Key Employment Sites are all larger, well-performing employment sites and as such, many of them could support additional non-strategic warehousing, storage and distribution uses. Policy E2 includes therefore includes criteria which support B8 uses that enable the continued operation of employment generating uses at that site. The ELNA (<https://www.oxford.gov.uk/downloads/file/4347/econ001---oxford-city-employment-land-needs-assessment-submission-version>) recognises that maintaining and refurbishing existing space, and enabling the development of premises for flexible industrial/warehousing uses in the city is the appropriate response given the modest amount of only non-strategic need.

Policy E2 includes a second criteria in order to support warehousing, storage and distributions uses in Oxford. It does this by allowing their delivery as part of a wider agreed masterplan on sites specifically allocated for B8 uses. One such site in Oxford is the Unipart site - a circa 30ha Key Employment Site which benefits from a site allocation policy that specifically references B8 uses as part of a wider mix of employment-generating uses. Discussions between the City Council and the site owners, Logicor, have taken place throughout the plan-making process. These took place informally via email and virtual meetings and included engagement that was undertaken in line with the process set out in the Developing Local Plan 2045 Site Allocations Background Paper ([BGP.002](#)).

Logicor's Regulation 19 representation ([REP.3-117](#)) supports Policy SPS17 and the inclusion of Industrial (B2), storage and distribution uses Industrial (Class B2), and research and industrial processes (Class E) at the Unipart site. It also confirms that Logicor is exploring measures to improve the use of the site and supports the policy principles and site-specific requirements. It is anticipated that the Unipart site will be redeveloped on a phased basis within the plan-period for a range of employment uses. Policy SPS17 therefore enables the redevelopment of the site for a broad mix of employment generating uses which are expected to include B8 uses, allowing the Unipart site to respond appropriately to changes in occupier demand over the plan period.

Having a number of Key Employment Sites, including the Unipart Site, all of which could support (through Policy E2) the delivery of appropriately scaled B8 uses to satisfy any occupier demand arising during the plan-period, means that the Plan provides the platform from which the storage and distribution and warehousing uses could be delivered in line with any market requirements arising.

The City Council therefore considers Policy E2 provides a flexible approach that supports the delivery of B8 uses over the course of the plan-period. However, in order to ensure future market flexibility, the following modification is proposed to the first bullet point under the “Policy Implementation” heading of the supporting text.

Policy Implementation

- *New B8 uses can only come forward on Key Employment Sites ~~in support of the main employment use~~ or as part of a wider agreed masterplan on sites specifically allocated for that purpose.*

This modification ensures that the market can provide storage and distribution uses in line with the forecast changes in occupier demand arising during the plan period.

In summary, Policy E2 creates the conditions to support the delivery of B8 uses in line with market requirements should they arise during the plan period, while remaining flexible enough to respond quickly to changes in economic circumstances and accommodate any needs not currently anticipated.

Q8 How much additional floorspace for warehousing, storage and distribution is proposed? How does this relate to need?

Only a small amount of storage and distribution floorspace has been promoted to the Council. This is set out in Tables 7.1 and 8.1 of the ELNA ([ECON.001](#)). The amount of storage and distribution uses (123sqm) is only a small proportion of the identified need. However, as set out in response to Matter 2 Issue 4 Question 4, this does not mean that there is no supply, and a policy framework is in place to enable the delivery of these uses on suitable sites within the Key Employment Site network should the market seek it. Given the modest need identified (46,086sqm), the ELNA ([ECON.001](#)) does not recommend the identification of new land or sites. This is because the growth in storage and distribution uses can be absorbed within the existing employment land portfolio – i.e., the Key Employment Sites. The Plan then supports B8 uses at these sites through Policy E2. If, market, and/or occupier demands change over the course of the plan-period, the Key Employment Site network will remain, and be able to accommodate any needs not anticipated by the plan.

Policy E2 provides support for appropriately scaled B8 uses to be delivered across a range of Key Employment Sites, including the 30+ha Unipart Site, which benefits from a site allocation policy (Policy SPS17). Logisor, the owners of the Unipart site, have expressed their support the inclusion of B8 uses as part of a broad mix of employment generating uses set in Policy SPS17. It is anticipated that the Unipart site will be redeveloped on a phased basis within the plan-period for a range of employment uses. Policy SPS17 therefore enables the redevelopment of

the site for a broad mix of employment generating uses which are expected to include B8 uses, allowing the Unipart site to respond appropriately to changes in occupier demand over the plan period.

The Plan therefore creates the conditions to support the delivery of B8 uses in line with market requirements should they arise during the plan period, anticipates that these needs can be met within existing site, in particular the Unipart site (SPA17), while remaining flexible enough to respond quickly to changes in economic circumstances and accommodate any needs not currently anticipated.

Issue 5 – Strategy for Student Accommodation – Policies H8, H9 and H14

Q1 What is the need for student accommodation over the Plan period? Is this set out in the Plan?

See response to Q3 and Q4 of Matter 2 – Issue 5

Q2 How does the Plan make provision to meet the identified needs for student accommodation?

See response to Q3 and Q4 of Matter 2 – Issue 5

Q3 Would the proposed locational focus of new student accommodation as set out in Policy H8 ensure that there would be sufficiently mixed and balanced communities across the Plan area? How would this approach create and/or maintain mixed and balanced communities and is it justified?

National policy and guidance make clear that the needs of groups with specific housing requirements, which includes students, are addressed and that an appropriate mix of housing types for the local community should be achieved. The PPG ([Housing needs of different groups](#)) also recognises that encouraging more purpose-built student accommodation can contribute towards housing needs where it releases conventional housing back into the general housing market that can help meet wider community needs. However, due to its constrained nature and as set out in Policy H1, Oxford cannot meet its housing needs in full, and consequently, those sites that are available are not just competing between different types of uses but also between different groups of housing. The Plan therefore has to carefully balance which sites are most suited to general market and much needed affordable housing as well as groups of specialist housing such as students, and whilst providing purpose-built student accommodation can take the pressure off the housing market, that type of development could also occupy a site that may be more suited to market and affordable housing, particular when available sites in the city are so limited.

The supporting text to Policy H8 explains that an unmanaged approach could lead to an over-concentration of student accommodation, and result in a high proportion of transient occupants, which would undermine mixed and balanced communities. The Updated Specialist Housing Needs Evidence (Iceni, 2025, [HEA.001](#)) notes that areas with high concentrations of student HMOs can experience issues relating to neighbourhood sustainability, community cohesion, perceptions of anti-social behaviour and seasonal fluctuations in occupancy. Similarly, housing students in unsuitable locations can create difficulties within communities and affect neighbourhood character.

Policy H8 restricts new student accommodation to existing or adjacent university, college, hospital and research campuses, city and district centres, and sites specifically allocated for student accommodation. By focusing provision in the most sustainable and appropriate locations within the city, where its impacts can be accommodated without undermining the character, social composition or housing function of established residential neighbourhoods, Policy H8 reduces the likelihood of residential neighbourhoods becoming dominated by student accommodation and therefore helps maintain a more balanced population mix, thereby ensuring there are some communities within the city with a solid and less transient character, whilst also seeking to provide accommodation to meet student needs. The policy allows for slightly more flexibility towards the location of graduate accommodation, reflecting its slightly different impacts.

Other requirements of Policy H8 for new schemes help to ensure that student accommodation functions effectively, minimising adverse effects on surrounding communities and contributing to wider housing objectives. These requirements include being supported by appropriate management arrangements, providing communal facilities in larger developments, and providing only operational and disabled parking.

The policy is consistent with the Plan's broader vision for a liveable city with strong communities and opportunities for all, as well as the spatial strategy in Policy S1, which directs development towards highly accessible locations and centres where a mix of uses is encouraged. Student accommodation is specifically identified as an appropriate use within city and district centres under Policy C1, where higher-density mixed-use development is expected. Concentrating student accommodation in these locations allows students to access services, public transport, academic facilities and employment opportunities while supporting the vitality of centres, rather than dispersing such accommodation across quieter residential neighbourhoods.

Overall, Policy H8 strikes an appropriate balance between supporting Oxford's globally important higher education institutions and protecting the availability of land and housing for permanent residents. By concentrating student accommodation in sustainable locations, supporting the release of conventional housing stock and avoiding over-concentrations of transient populations, the policy would help create and maintain mixed and balanced communities and is therefore justified, effective and consistent with the Plan's wider strategy.

Q4 How would the approach set out in Policy H9 adequately ensure that the provision of student accommodation would be conditionally linked to the provision of new academic facilities? How would this be delivered and monitored?

The Updated Specialist Housing Needs Evidence (Iceni, 2025, [HEA.001](#)) identifies that the student threshold and associated student accommodation policies were previously introduced specifically to manage the impacts of student growth on Oxford's housing market (paragraph 6.23). Paragraphs 6.23-6.27 of [HEA.001](#) set out the reasons for the threshold, highlighting that increased numbers of students living in the private rented sector, particularly HMOs, place

pressure on lower-cost rented accommodation, contributing to rising rents and risking displacing other households who rely on this sector. It concludes that increased pressure from students living outside university-provided accommodation would likely displace households who are less able to pay, increase homelessness presentations and place additional pressure on temporary accommodation provision.

Policy H9 provides a clear and effective mechanism to ensure that the expansion of higher education institutions is directly linked to the provision of sufficient student accommodation. The policy requires that planning permission for new, redeveloped or refurbished academic, research or administrative facilities will only be granted where either the proposal would not generate or facilitate an increase in student numbers, or where the institution can demonstrate that adequate accommodation is already available or will be provided to meet the needs of any additional students. This ensures that growth in academic floorspace cannot occur independently of consideration of associated accommodation requirements and helps to minimise pressure on Oxford's constrained housing stock, supporting the Plan's objective of protecting homes for the city's resident population.

The policy delivers this through a measurable threshold approach for the University of Oxford and Oxford Brookes University. For the University of Oxford, planning permission will only be granted where the number of full-time taught students requiring accommodation does not exceed university-owned or managed accommodation by more than 3,100 students, while Oxford Brookes University must demonstrate that the number of full-time taught students requiring accommodation does not exceed university-owned or managed accommodation, together with known purpose-built student accommodation, by more than 5,750 students. By establishing these quantified thresholds, the policy creates a direct relationship between academic growth and accommodation provision, ensuring that institutions maintain sufficient accommodation capacity before additional academic development is permitted. More information into how the thresholds in Policy H9 have been calculated can found in paragraphs 6.54-6.69 of [HEA.001](#).

The delivery of the policy is supported by a transparent methodology set out in Appendix 2.3. of the Plan ([CSD.001](#)). This identifies how qualifying student numbers are calculated, excluding categories of students who do not generate typical accommodation demand in Oxford, such as part-time students, students already resident in Oxford prior to study, and those studying primarily outside the city. The methodology also specifies which forms of university-provided accommodation are counted towards supply. This provides a consistent and objective basis for assessing compliance at the planning application stage.

Monitoring will be undertaken through the Authority Monitoring Report (AMR). The Monitoring Framework identifies Policy H9 as a specific monitoring indicator and records planning permissions granted for student accommodation and for academic, research and administrative facilities. Appendix 2.3 further confirms that universities will provide annual data on student numbers and accommodation provision through a yearly snapshot process, enabling the Council to assess compliance with the thresholds and monitor trends over time. This monitoring process ensures that the effectiveness of the policy can be continually

reviewed and that academic growth remains appropriately aligned with student accommodation provision throughout the plan period.

Overall, Policy H9 is justified, effective and capable of being monitored. It establishes a robust and evidence-based framework that links institutional expansion to accommodation capacity, helping to ensure that the continued growth of Oxford's higher education sector does not place unacceptable pressure on the city's housing market while supporting the wider objectives of creating balanced and sustainable communities.

Q5 Does the approach for the provision of boarding school accommodation as set out in Policy H14 reflect the overall strategy for student housing set out in the Plan? Does it also reflect the overall spatial strategy as set out in Policy S1?

Overview

There is no National Policy related to boarding school accommodation. Paragraph 100 (NPPF 2024) states "It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted" but this relates to provision of the school itself not associated accommodation. The NPPF is clear that 'housing needed for different groups in the community should be assessed and reflected in planning policies', and that these groups include students (paragraph 63). The supporting text to Policy H9 acknowledges that accommodation needs are generated by higher education institutions, i.e. those that offer courses for students of 18+, 'many of whom move to live in the city and therefore generate additional accommodation needs.' However, whilst there may be a demand for boarding accommodation for schools, this is very different to the housing need generated by higher education institutions, and the housing needs of students noted in paragraph 63 of the NPPF.

Overall Spatial Strategy

The spatial strategy, set out in Policy S1, provides the overarching framework for directing development across Oxford to 2045. Recognising that Oxford is a highly constrained city with insufficient land to meet all of its development needs within its boundaries, the strategy seeks to balance the delivery of housing, jobs and services with the need to protect and enhance the city's valued green infrastructure, heritage assets, biodiversity and environmental resources. Its primary focus is to maximise sustainable housing delivery, alongside supporting Oxford's globally important knowledge economy and the transition to net zero carbon by 2040. Development is directed towards the city centre, district centres, Areas of Focus and Key

Employment Sites, which are the most accessible and sustainable locations, while avoiding harm to the Green Belt, floodplain, and the city's green and blue networks.

By requiring boarding accommodation to be located on or immediately adjacent to the associated teaching campus, Policy H14 ensures that pupils can access education facilities directly, reducing the need for additional travel and supporting sustainable patterns of movement. It also avoids the dispersal of boarding accommodation into unrelated residential areas where it may compete with housing delivery or create amenity impacts. Furthermore, the supporting text to Policy H14 explains that boarding accommodation located away from the main school site could reduce opportunities to bring forward land for housing that is meeting identified needs (which maybe market and affordable housing or student accommodation meeting the needs of students), increase travel between accommodation and teaching facilities, and potentially affect residential amenity. The policy therefore seeks to minimise these conflicts while ensuring a suitable living environment for pupils. This directly supports Policy S1(e), which prioritises housing opportunities where appropriate, Policy S1(c), which focuses development in locations with sustainable travel opportunities, and Policy S1(f), which seeks to ensure that new uses do not harm the amenity of neighbouring uses.

Overall Strategy for Student Housing

The Plan's overall strategy for student housing is to support the accommodation needs arising from Oxford's universities and educational institutions whilst safeguarding land for general housing and maintaining mixed and balanced communities. Policies H8 and H9 direct new student accommodation to sustainable locations closely related to the institutions they serve and ensure that growth in student numbers is accompanied by appropriate accommodation provision. This approach seeks to reduce pressure on the city's limited housing stock, minimise travel demand, support sustainable patterns of development and align with the wider spatial strategy in Policy S1. The overall strategy for student housing and policies H8 and H9 relate to post-18 student accommodation, whereas H14 relates to children ages 18 and under, so they are not counted in calculations of housing need, or in monitoring of housing completions, therefore the strategy does not apply to H14.

Conclusion

Policy H14 is a justified and effective policy that supports the Plan's spatial strategy by providing a locally appropriate approach to boarding school accommodation within Oxford's constrained land supply. By requiring boarding accommodation to be located on or immediately adjacent to the associated school campus, it ensures accommodation remains functionally linked to the school, reduces the need to travel, supports pupil welfare and supervision, protects residential amenity, and avoids unnecessary pressure on sites that may be better suited to meeting general housing needs, including the needs of particular groups. Although boarding accommodation does not contribute towards housing delivery targets, the policy is consistent with the wider objectives of Policy S1 by directing specialist accommodation to sustainable and appropriate locations while safeguarding opportunities to address Oxford's housing needs.