



8th October 2026

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Dear Katherine,

Re: CPRE Oxfordshire Hearing Statement - Oxford City Local Plan

The Campaign to Protect Rural England (CPRE) Oxfordshire would like to thank you for confirming our request to attend the Oxford City Local Plan hearings. As a charity, we will be represented by several volunteers who have expertise on different matters and for whom we will be able to confirm names in advance of hearing sessions, as requested.

In addition to our detailed Reg 19 response, we provide below a Hearing Statement which relates to the Inspector's Questions. Although we reference the information provided below in relation to the Inspector's specific questions, much of it is relevant to other questions which they have raised, and we would wish to rely on this information and our Reg 19 response at the Examination where this arises.

Matter 1: Issue 3 - Sustainability Appraisal

Q2 In considering and testing high-level growth options, how have other policy requirements shaped strategic decisions, such as Policy G1 and the protection of 'Core Spaces'?

CPRE consider Policy R5 as inadequate to meet the growth levels proposed. Strategic decisions and development plans have failed to address the wastewater crisis that the City currently experiences and will be only exacerbated by these Plans. It must be acknowledged that many of the sites proposed will not be able to adequately be provided for in relation to wastewater and they should therefore not proceed until this is addressed.

Figures provided by the Environment Agency have revealed that sewage release from the Oxford Water Treatment Works, in the period up to 19 February 2026, was for 355 straight hours. This is a serious challenge for the state of our rivers and for the River Thames which is now being treated as an open sewer. There is no indication that the problem is being rectified - it is, if anything, becoming worse.

Despite the current scandalous situation relating to the state of our rivers, Oxford City Council continues to grant planning permission for developments which will clearly increase the flow of sewage to the Oxford Water Treatment Works, which is already unable to adequately treat existing flows. The Environment Agency has acknowledged that the Treatment Works has been non-compliant since at least 2017.

Thames Water, who are currently working towards improving the Oxford Water Treatment Works, have set out a phased improvement plan entitled “Oxford STW” dated 29 May 2025 which they are working towards. Phase 4, described as a “Major Upgrade”, is not due for completion until 2030, and there is no guarantee that these works will take place in this time.

The proposed wording of draft Policy R5 is only likely to worsen an existing problem. Oxford City Council continues to fail in its responsibility and blame others for the current situation. However, as the relevant Public Health Authority, Oxford City Council must protect those using the local rivers, keeping them safe and not to make the situation worse.

It is not understood why draft Policy R5 requires only a Foul and Surface Water Strategy for new build residential developments of 100 dwellings or more. The problem of treating foul water discharge to the Treatment Works has been known for some years. Much smaller developments will have an impact, and the limit should be set much lower. This should be reflected in Policy R5.

In the Oxford Sustainability Assessment, it is stated that:

Oxford is in an area of serious water stress and experiences ongoing challenges around water quality in its watercourses due to various sources of pollutants, although good progress is being made working with Thames Water and the EA on the issue of wastewater treatment, which is a key contributor.

This is even though Thames Water has been fined a total of £104 million for breaches of the rules relating to its wastewater operations in 2025.

The role of the local planning authority in relation to the discharge of sewage is set out in Barratt Homes Limited v Dwr Cymru Cyfyngedig (Welsh Water) (see Paragraph 44 of the judgment).

Policy R5 should set out that each planning application should be dealt with on its own merits, so far as the issue of local discharge of sewage is concerned. This would cover, for example, new student accommodation which is not covered by the proposed Policy R5.

We will continue to monitor the improvements at the Treatment Works and will be able to provide details of what has been achieved when the Public Inquiry takes place. This will include how Policy R5 should be revised to ensure that our rivers and watercourses are improved, rather than be allowed to deteriorate further and make delivery of this plan unachievable.

Matter 3: Issue 2 – Core Green Infrastructure Network – Policy G1

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

Policy G1 is inconsistent with NPPF 104 because:

- NPPF 104 requires re-provision to be equivalent or better whereas Policy G1 requires harm/loss to be mitigated by ensuring sufficient re-provision. This is, in and of itself, problematic.
- NPPF 104 requires equivalent or better re-provision where facilities are not surplus to requirements whereas G1 requires particular attention to be paid to “local need arising from existing deficits of (recreation) spaces.”

It is not possible to determine whether a recreation ground is either needed or surplus to requirements or whether re-provision is sufficient without a recreation policy with standards against which that need or that re-provision can be judged.

Different types of green infrastructure require different standards. The Green Infrastructure Standards for England state that: “The Accessible Greenspace Standards do not cover formal sports provision, for which Sport England is responsible; nor play provision, which is covered by Play England.”

For example, conflating green infrastructure and recreation standards has already led to a situation in which planning officers conceded that Bertie Place Recreation Ground would not be replaced by equivalent or better recreational provision, but that this was not seen as undermining Green Spaces Strategy objective 04 as it maintained access to green space.

In a report to Planning Review Committee (9.9.26) OCC said: “Oxford City Council’s Green Spaces Strategy 2013-2027 is a corporate policy on how the City Council will plan and manage the city’s public parks and green spaces. Corporate policies should inform and support the Local Plan, but they are not planning policy themselves. Such strategies set out what the authority wishes to achieve as an organisation. At Local Plan examination, Planning Inspectors will expect Local Plan policies to be justified by evidence (such as the Green Infrastructure Study) rather than simply because they appear in a corporate strategy. The Green Spaces Strategy is a planning consideration which is given limited weight.”

The Green Spaces Strategy gives access and design standards for recreational facilities. It already carries little weight and will expire in 2027. The Green Infrastructure Study gives only access standards, but it is not a policy document. At Planning Review Committee (9.9.26), OCC instead decided to cherry-pick one of the Fields in Trust (FIT) Standards. “‘Creating Great Spaces for All’ (2024) is not adopted by the Council as planning policy. However, the FIT Standards are a useful benchmark which suggests that ‘All homes should be within 200-300m walking distance of open space with everyone having access to the full range of open space types with 1000m.’ But the FIT

standards also include access standards for the different types of open space, and signposts to useful design standards.

The new NPPF requires local authorities to have a recreation policy. Although the 2045 plan is not being examined under the 2026 NPPF, if OCC does not have a proper recreation policy, NPPF 104/CH7 becomes simply irrelevant.

Matter 3: Issue 4 – Employment Strategy – Policies E1 and E2

CPRE consider, and wish to rely on as evidence, the following analysis to be relevant to most questions on this issue, particularly:

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

We do not feel that the employment sites are justified. We present below a review of the existing and emerging situation, which highlights that there is plenty of available employment space currently available but not utilised and standing empty, with even more committed. CPRE believe this evidence illustrates that the available brownfield sites within the City must be given over to homes and not further employment.

Commercial Laboratory / Office space in Oxford - CPRE review of space available on larger sites and what will become available

Information believed to be correct as of 24 August 2026 (derived from public sources).

Space available now

Oxford Business Park (ARC)

The largest amount of older office/laboratory space (mostly refurbished) which is currently on the market is at ARC. This was formerly known as the Oxford Business Park and is located on or near the Garsington Road. There are currently 118,179 sq. feet available for a variety of uses. This is made up as follows:

Description	Area (sq. feet)	Notes
Building 5510	12,310	Lab space
Building 6000	34,361	Office, lab space and manufacturing
Building 9400	3,470	Office space
Spires House	37,654	Office space
Building 4150	5,696	Office/lab space

Description	Area (sq. feet)	Notes
Building 4610 and 4620 (linked)	15,383	Office/lab space
Building 7200	8,502	Office/lab space
Building 7400	1,803	Primarily lab space
Total	118,179	

Oxford North, Woodstock Road

Thomas White Oxford Limited, based at St John's College, are currently marketing the first tranche of the Oxford North Development. This has overall permission for 1,000,000 sq. feet of office/laboratory space. The site is owned by a joint venture called Oxford North Ventures Limited (50% owned by Thomas White and 50% by Cadillac Fairview, a Canadian company and Stanhope PLC; Cadillac represent the real estate arm of the Ontario Teachers' Pension Plan).

Building	Area (sq. feet)	Notes
1 and 2 Falaize Street	115,000	Lab space
Red Hall	35,000	Office space for science and innovation start ups
Total	115,000	

Mischon de Reya, a firm of solicitors, have taken 3,500 sq. feet of space since these buildings were completed in September 2025.

Space which will become available in next 12 months

Oxford Business Park

In addition to their older stock of rental space, ARC is currently finishing a new building called Ascent House which will shortly be available for occupation and space is available now. This is described as a new purpose-built, lab-ready office building. Space available covers 92,000 sq. feet. Also, nearing completion is Trinity House on the Garsington Road (at the entrance to Oxford Business Park) which has 214,000 sq. feet of new office/lab space available to lease.

135 Botley Road - Phase 2 of the West End, Oxford's Urban Science District

Fabrica is another almost complete building incorporating office/lab space which will have 180,000 sq. feet of new office/lab space available within the next 12 months

Oxford Science Park

There is a substantial new development at this well-established science park originally owned by Magdalen College.

In June 2024, construction started on three new advanced laboratory and office buildings which are collectively known as the Daubeny Project. This will provide 450,000 sq. feet of space. It is scheduled to be completed in 2026, with the following office/laboratory space:

Building	Area (sq. feet)
Building 1	132,000
Building 2	142,000
Building 3	174,000
Total	448,000

The project was acquired by the Ellison Institute of Technology in 2025.

Planning approval granted but yet to be started

East Point Life Science Campus, East Point Business Park, Littlemore

Located just off the Eastern Bypass, this site is owned by Railpen and gained planning permission in November 2024. There will be three, four-storey laboratory buildings and a single-storey amenity building. The estimate is that it will provide 200,000 sq. feet of life science laboratory space. On the website it is stated that 55% will be CL2 laboratory and 45% office space.

Oxpens site

This central brownfield Oxford site is owned by OxWED LLP, a joint venture between Nuffield College and Oxford City Council. Planning permission was granted in January 2025. This scheme, which includes other commercial development, includes 500,000 sq. feet of office and laboratories. This scheme is already substantially delayed.

Hythe Bridge Street

This central Oxford Site is owned by Forge Bio GP 2 Ltd and others and is currently made up of several buildings which will need to be demolished before the scheme can go ahead. The plan is to build one new building to replace three existing buildings. In total, 140,000 sq. feet of laboratory/office space has been approved.

234 Botley Road, formerly known as New Barclay House

Owned by Columbia Threadneedle, this site is currently made up of a large office building which is to be demolished. Planning permission was granted in 2015 and includes 177,000 sq. feet laboratory/office space.

Retail site 195 Botley Road

This site, which is owned by British Land, was home to a variety of well-known brands including Currys PC World, Wren Kitchens, and others. It is intended to clear the site and erect a new science park which would have 376,000 sq. feet of available “space for science and technology.” Planning permission has been granted.

Oxford North

This vast site has permission for about 900,000 sq. feet of office/laboratory space, in addition to that already constructed.

Schemes currently in the planning phase.

Kassam stadium

As part of the redevelopment of the stadium, when and if Oxford United move to Kidlington, it is proposed that Ozone Leisure Park would disappear and the site developed as office and laboratory space. The available space for this would be in the region of 500,000 sq. feet. The site is owned by Firoka Group.

Debenhams Store, Magdalen Street

Debenhams closed in 2024 and is currently empty. Strathclyde Pension Fund is proposing to convert the building, which is over a hundred years old, to laboratory/office space. According to its website, it has 126,500 sq. feet available for this purpose.

Average letting each year of office accommodation

Savills produce a quarterly Oxford office market round-up. For the final quarter of 2025, they recorded that office take up reached 192,0000 sq. feet in 2025. This represents all the office/laboratory lettings in Oxford. They state that there were three deals over 10,000 sq. feet which was below the five-year average of seven deals per annum. The largest deal was at Building 2600 on the Oxford Business Park (ARC) where Oxfam have moved, having downscaled from their larger building on that Park, taking 26,500 sq. feet. of space.

Summary of Existing and Emerging Office Space

Space available now	230,000 sq. feet
Space available in the next 12 months	930,000 sq. feet
Planning approved but no completion date	2,295,000 sq. feet
Schemes in planning phase	626,500 sq. feet

In the light of the experience at Oxford North, where prime new accommodation has been unlet for 12 months, the requirement for new space appears to be exaggerated. Future requirements for top grade office/laboratory space over the next decade could all be accommodated on that site alone.

We hope the Inspector will consider the additional information and comments in this Hearing Statement.

We will have expert volunteers on these issues and others we have raised in our Reg 19 response at the hearings able to comment further.

Yours faithfully,

Lynda Moore
 Planning coordinator, CPRE Oxfordshire
