



Planning Inspectorate

Examination of the Oxford Local Plan 2045

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Date 13 October 2026

Matters, Issues and Questions for Stage 2

Published v1

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Introduction

Prior to the forthcoming Stage 2 hearing sessions, responses are invited from participants on the following Matters, Issues and Questions ('MIQs') for Examination. The MIQs are based on the Main Issues identified by the Council and other relevant issues raised by representors.

Stage 2 hearing sessions will run between 24 November and 11 December 2026. The focus of the Stage 2 hearings will be non-strategic matters including site allocations development management policies.

The deadline for providing Hearing Statements for Stage 2 is **5pm on Tuesday 10 November 2026**. Further information about the examination, hearings and format of written statements is provided in the accompanying Stage 2 Examination Guidance Note, which should be read alongside the MIQs.

In answering questions and producing hearing statements, participants should be aware of the Council's background topic papers dated June and July 2026, the latest Memorandum of Understanding relating to Oxford's unmet housing need (Core Document COM.003, dated 2 July 2026) and the Council's suggested changes to Policy H1 (Core Document CSD.009). These documents are available on the examination website <https://www.oxford.gov.uk/oxford-local-plan-2045/oxford-local-plan-2045-examination>

The Local Plan was submitted for examination on 14 July 2026. On 17 August 2026 an updated version of the National Planning Policy Framework ('the Framework') was issued. However, it contains a transitional arrangement meaning that, for the purpose of this examination, the policies in the 2024 Framework continue to apply. Therefore, unless otherwise stated, any references to the Framework in this document refers to the 2024 version.

Matter 4 – Site Selection Methodology

Issue 1 – Site Selection Methodology

1. The Developing Site Allocations Background Paper¹ describes the assessment and filtering of potential development sites through different stages. The first stage sought to identify a large pool of potential sites. Over 500 are recorded in the Strategic Housing Land Availability Assessment ('SHLAA')².
2. A three-staged approach was then used to sift potential development sites and identify reasonable and deliverable options. Stage 1 'intrinsic constraints' considered whether there were any insurmountable physical or environmental constraints. Examples include greenfield sites within the floodplain (Flood Zone 3b). At this stage deliverability was also considered, with sites sifted out if they would fail to deliver at least 10 dwellings or if there was no robust evidence to show that a site could be developed during the plan period.

Q1 Paragraph 2.11 of the Developing Site Allocations Topic Paper states that at Stage 1, sites were not assumed to be deliverable if there was serious conflict with the Plan's strategy and no mitigation was available. Examples cited include conflicts with 'Core Green Infrastructure'. What sites were sifted out at this stage based on conflicts with 'Core Green Infrastructure', and was the approach justified and positively prepared given the need for housing in Oxford?

Q2 What is the estimated number of sites (and scale of housing proposed) that were sifted out at Stage 1?

3. Sites passing to the second stage were then subject to a more in-depth analysis which involved the Sustainability Appraisal ('SA') framework and discussions with site owners and promoters. From this second stage, a shortlist of sites was created and presented as the Preferred Options in the Regulation 18 consultation.

Q3 What were the reasons for discounting sites at Stage 2? Was the approach, including the use of the SA framework, adequate and robust?

4. Following the Regulation 18 consultation, a further 'Call for Sites' was undertaken in October 2025. At this stage, paragraph 2.23 of the Developing Site Allocations Background Paper also states that the "Green Belt Assessment had also at this point reached a stage where Green Belt and Grey Belt sites could be identified for assessment as potential site allocations."

¹ Core Document BGP.002 015 and Appendices

² Core Document HEA.003a and Appendices

Q4 How did the Council consider Green Belt implications in establishing site allocations prior to the completion of this evidence?

Q5 Once the Green Belt and Grey Belt evidence was available, how did the Council go back and check previous assumptions and assessments, including sites that had been previously rejected at earlier stages?

Q6 Following the Regulation 18 stage, what were the reasons for not taking forward preferred site options?

Q7 Did the process differ between different types of allocations – for example between residential and employment allocations? If so, how, and was the selection process robust across when considering alternative uses?

Q8 How did the Council consider the suitability of sites already allocated for development in the Oxford Local Plan 2036?

Q9 How did the Council consider necessary infrastructure requirements of proposed allocations, such as the need for highway improvement works or new and improved services, such as education and health?

Q10 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

Issue 2 – General Site Allocation Requirements

Q1 What is the justification for requiring minimum dwelling numbers on some allocations? Are the policies sufficiently flexible enough to be effective?

Q2 What is the justification for repeating and cross-referencing other policy requirements in each allocation, for example, requirements relating to drainage, heritage and design?

Q3 How has the risk from flooding been considered in the allocation of land for development and subsequent site allocation policies? Is the Plan consistent with national planning policy insofar as flood risk avoidance and mitigation is concerned?

Q4 What is the justification for referencing the Council's High Buildings Technical Advice Note ('TAN') in some site allocations? Is it sufficiently clear what is required of proposals for new development?

Matter 5 – Site Allocations

Issue 1 – West End and Botley Road Area of Focus

Q1 Is Policy WEBRAOF justified, effective and consistent with national planning policy?

Q2 What is the boundary of the West End and Botley Road Area of Focus based on, and does it include all the allocations SPCW1-12?

SPCW1 – Banbury Road University Sites (Parcel B)

Q1 What is the latest position regarding development proposals for the site?

Q2 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPCW2 – Botley Road Sites including River Hotel and Westgate Hotel

Q1 What is the justification for allocating three individual sites under the same policy?

Q2 How and when will the allocation come forward and is it developable within the plan period?

Q3 What is the policy expectation for the River Hotel and Westgate Hotel, which are described by the Plan as forming part of the Oxford Heritage Asset Register? Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned?

Q4 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPCW3 – Canalside Land, Jericho

Q1 How and when will the allocation come forward and is it developable within the plan period? How will the expected mix of uses be achieved?

Q2 Will the allocation give rise to any likely effects on the integrity of the Oxford Meadows SAC through increased recreational disturbance? What (if any) mitigation may be required as part of future development proposals?

Q3 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

Q4 What additional infrastructure is necessary to make the allocation justified? Where the allocation refers to bridge crossings, works to open up views of St Barnabas Church and provision of a community centre, how will these be delivered and by whom?

SPCW4 – Faculty of Music

Q1 What is the latest position regarding the approved planning permission for the site? How does it relate to the proposed allocation (including the site boundary)?

Q2 What is the justification for requiring a car-free development in this location and how are proposals expected to reduce car parking along Floyds Row?

SPCW5 – Jowett Walk

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

SPCW6 – Manor Place

Q1 Is it sufficiently clear to users of the Plan what is required of proposals in relation to car parking? Policy SPCW6 states that planning permission will be granted for student accommodation or car free residential development, whereas criterion j) refers to *“low-car residential development”*.

Q2 Does Policy SPCW6 adequately address the identified heritage constraints surrounding the site? Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned?

Q3 In determining the suitability of the site, how has its proximity to the Marston Meadows SSSI been considered? Can the allocation be developed in a way that avoids adverse impacts on the integrity of the SSSI?

SPCW7 – Nuffield Sites

Q1 Is it sufficiently clear to decision-makers, developers and the local community how many dwellings are proposed on the site?

Q2 What is the justification for allocating three sites under the same policy? How and when will the allocation come forward and is it developable within the plan period?

Q3 Is criterion b) sufficiently clear enough to be effective? What 'opportunities' are expected and how will these be achieved?

Q4 In allocating the site, how has the Council considered the visual impact of any development proposals, including on key views? Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned, including the approach to non-designated heritage assets?

SPCW8 – Osney Mead

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q2 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPCW9 – Oxford Railway Station and Becket Street Car Park

Q1 What is the site boundary based on and will it be effective in enabling the allocation to come forward?

Q2 Are the proposed mix of uses appropriate and justified for a development in this location?

Q3 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the proposed scale and mix of uses are developable?

SPCW10 – Oxpens

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the entire allocation is developable within the plan period, having particular regard to land ownerships?

Q2 Is it sufficiently clear what is meant by complementary leisure and community uses? Is the allocation justified and effective?

SPCW11 – St Thomas School and Osney Warehouse

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q2 Having regard to the answer to Q1 above, what is the justification for the re-provision of community uses on the site?

Q3 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPCW12 – West Wellington Square

Q1 What is the latest position regarding development proposals for the site?

Issue 2 – Cowley Branch Line Area of Focus

Q1 What is the justification for requiring financial contributions towards public transport enhancements, from trip-generating uses within a 1,500m buffer zone of the proposed Cowley Branch Line stations? How has the zone been established and is it based on appropriate available evidence?

Q2 Outside the 1,500m buffer area, what is the justification for Policy CBLAOF stating that proposals will be considered on a case-by-case basis? What is the infrastructure that the policy seeks to deliver and how is this related to the allocations in the Plan?³

SPS1 – 474 Cowley Road

Q1 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPS2 – ARC Oxford

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

³ Inspectors' Note – For participants making representations on this issue against Policy S3, please refer to Matter 11 (Infrastructure and Viability)

Q2 Where the allocation refers to a bridge over the railway, how will this be delivered and by whom?

SPS3 – Bertie Place Recreation Ground

Q1 What is the latest position regarding development proposals for the site? What evidence is there to indicate that the site is developable within the plan period?

Q2 Is the allocation justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

Q3 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPS4 – Cowley Marsh Depot

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period, or will it be a longer-term aspiration for development?

Q2 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPS5 – Crescent Hall

Q1 What is the current use of the site and how/when will it come forward for development?

Q2 What is meant by criterion i), which states that new residential development should be “low car”? Are the requirements justified and is the allocation likely to be effective?

SPS6 – Former Iffley Mead Playing Field

Q1 What is the latest position regarding the development proposals for this site?

Q2 Is the allocation justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

Q3 Can a safe and suitable access to the site be achieved for all users, consistent with paragraph 115 of the Framework?

SPS7 – Kassam Stadium, SPS11 – Overflow Car Park at Kassam Stadium and SPS13 - Ozone Leisure Park

Q1 What is the latest position regarding the proposals for the new football stadium, and consequently, the redevelopment of the existing stadium, overflow car park and leisure site?

Q2 What is required of the masterplan referred to by Policies SPS7, SPS11 and SPS13? Does the Plan require the sites to come forward as part of a single, comprehensive development?

Q3 What evidence is there to indicate that the sites are developable within the plan period?

Q4 Is it sufficiently clear what uses will be permitted across the sites? For example, Policy SPS7 refers to the 'precedent' for employment uses, which will be acceptable as a 'secondary' use on the site. Are the policies clear and effective?

Q5 What is the justification for requiring applicants to 'investigate' the potential for a restricted access for servicing and emergency vehicles to the overflow car park site in Policy SPS11? Is the policy clear and effective in relation to access arrangements?

SPS8 – Land at Meadow Lane

Q1 What is the scale of residential development proposed by Policy SPS8 and how has it been established?

Q2 What is the latest position regarding the proposals for the site?

Q3 How have the effects of development on ecology and on the integrity of the Iffley Meadows SSSI been considered as part of the site allocation process? What information is available to demonstrate that criterion a) can be met?

Q4 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Iffley Conservation Area and the setting of neighbouring listed buildings?

Q5 Can a safe and suitable access to the site be achieved for all users, consistent with paragraph 115 of the Framework?

Q6 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPS9 – Littlemore Mental Health Centre

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

SPS10 – Mini Plant Oxford

Q1 What is the justification for criterion a) which requires “*additional greening*” to help meet the Urban Greening Factor? How does this take into account the context of the site and its intended uses?

Q2 Is it sufficiently clear what is required from criterion e), which states that “*Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how the developments will be viewed from afar...*”. Is the requirement, justified, clear and effective?

SPS12 – Oxford Science Park

Q1 What is the extent of residential development permitted by Policy SP12?

Q2 What is expected of development proposals under criterion g)? Is the provision of wider public access justified as part of any possible future expansion?

SPS14 – Redbridge Paddock

Q1 How have the effects of development on ecology and on the integrity of the Iffley Meadows SSSI been considered as part of the site allocation process? What information is available to demonstrate that criterion a) and c) can be met?

Q2 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q3 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

SPS15 – Sandy Lane Recreation Ground

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q2 Is the allocation justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

SPS16 – Templars Square

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q2 Is it sufficiently clear what uses will come forward and when? Will the policy be effective in securing the mix of uses proposed, such as community facilities and a new health centre?

SPS17 – Unipart Site

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period?

Q2 How are proposals expected to “*respond to the allocation of the land at Northfield on the southern edge of the site...*”? Is it sufficiently clear to users of the Plan what is required of development proposals for the Unipart Site?

Issue 3 – Marston Road and Old Road Area of Focus

Q1 Is Policy MRORAOF justified, effective and consistent with national planning policy?

SPE1 – Churchill Hospital

Q1 What is the justification for permitting ‘other suitable uses’ that must have “*an operational and/or research link to the hospital*”?

Q2 What is required of development proposals in respect of surface car parking? How will surface car parking be rationalised across the site as required by criterion k)?

SPE2 – East Oxford Bowls Club

Q1 Is the allocation justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

Q2 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Bartlemas Conservation Area and the setting of neighbouring listed buildings?

Q3 What evidence is there to indicate that the site is developable within the plan period given its size and the requirements in Policy SPE2?

SPE3 – Government Buildings and Harcourt House

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

Q2 What is the justification for requiring open space to be provided on site? Does this reflect the requirements in Policy G2?

Q3 Is it sufficiently clear what is meant by criterion o), which requires proposals to ensure that new development “*mitigates amenity impacts on the setting of the adjacent park...*”? Is Policy SPE3 justified and effective?

SPE4 – Jesus College Sports Area and SPE7 – Lincoln College Sports Ground

Q1 What are the site boundaries of both allocations based on, and how do they relate to remaining areas of land used for sports and recreation? Is it the intention that the Jesus College and Lincoln College sites will come forward separately, or as part of a single, larger redevelopment of the area?

Q2 Are the allocations justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

Q3 How will development proposals meet the requirements of Policy G1(B)? What evidence is there to indicate that the sites are developable within the plan period for the uses proposed?

Q4 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the sites can be developed in a way that respects the setting of the Bartlemas Conservation Area and neighbouring listed buildings?

SPE5 – John Radcliffe Hospital

Q1 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

Q2 What is the justification for permitting ‘other suitable uses’ that must have *“an operational and/or research link to the hospital”*?

SPE6 – Land Surrounding St Clement’s Church

Q1 How have the effects of development on ecology and on the integrity of the new Marston Meadows SSSI been considered as part of the site allocation process? What information is available to demonstrate that criterion a) and c) can be met?

Q2 How will criterion g) be secured and enforced, which requires *“Gardens with rich planting along boundaries...”*? Is Policy SPE6 justified and effective?

Q3 What is the justification for criterion s), which states that *“Parking should be kept in the public realm where possible...”*?

SPE8 – Manzil Way Resource Centre

Q1 What evidence is there to indicate that the site is developable within the plan period for the uses proposed? What is the scale of residential development permitted on the site?

Q2 Is it sufficiently clear what is meant by criterion j), which states that *“Non-residential development should attempt to reduce parking and should have no more parking than is necessary...”*? Is Policy SPE8 effective?

SPE9 – Marston Paddock Extension

- Q1 What is the site boundary based on and is it justified?
- Q2 Can all the requirements of Policy SPE9 be achieved within the red line boundary? Is the policy effective?
- Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

SPE10 – Nuffield Orthopaedic Centre

- Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPE11 – Oxford Brookes Marston Road Campus

- Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?
- Q2 What is expected of development proposals under criterion c), which seeks to enhance and connect green infrastructure including between the Milham Ford Nature Park, inner quad and surrounding GI network? How will this be achieved and is the policy effective?
- Q3 Is criterion h) justified and effective, which 'encourages' reuse of the original building fabric where this is 'feasible'?

SPE12 – Rectory Centre

- Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPE13 – Ruskin Campus

- Q1 What is the latest position regarding development proposals for the site?

SPE14 – Ruskin Field

- Q1 What is the site boundary based on and is it justified?
- Q2 How has the scale of residential development been established and is Policy SPE14 justified and effective, having particular regard to the context of the site and the need to make an efficient use of land?
- Q3 Can a safe and suitable access to the site be achieved for all users, consistent with paragraph 115 of the Framework?
- Q4 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned? What information is available to demonstrate that the site can be developed in a way that preserves or enhances the character or appearance of the Old Headington Conservation Area and the setting of neighbouring listed buildings?
- Q5 What is the justification for criteria j) and h), which require development to be ‘kept low’ and retain important views, including specific reference to the view from Stoke Place across the site to Elsfield?

SPE15 – Slade House

- Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPE16 – Thornhill Park (Phase 2)

- Q1 What is the latest position regarding development proposals for the site?
- Q2 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPE17 – Union Street Car Park

- Q1 Is it sufficiently clear to users of the Plan what is required by criterion e), which states that *“Car parking spaces should be retained to a level at which the City Council considers is reasonable to serve and safeguard the vitality of the district centre.”* Is the policy justified and effective?

SPE18 – Warneford Hospital

Q1 What is the latest position regarding development proposals for the site?

Q2 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

Issue 4 – Northern Edge of Oxford Area of Focus

Q1 What is the justification for the suggested changes to Policy NEOAOF, as set out in Core Document CSD008? Why are they necessary for soundness?

Q2 Where reference is made to sites in Cherwell District, is it necessary for soundness to state that they are intended to help contribute towards Oxford's unmet housing needs (if that is the case)?

SPN1 – Diamond Place and Ewert House

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable (as a whole) within the plan period for the uses proposed?

Q2 Is it sufficiently clear to users of the Plan what is required by criterion o), which states that *"The City Council will seek to minimise public car parking on the site to a level that is reasonable to serve the area..."*? Is the policy justified and effective?

SPN2 – Elsfield Hall

Q1 What is the current use of the site and how/when will it come forward for development? What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPN3 – Oxford North Remaining Parcels

Q1 What is the latest position regarding development proposals for the site?

Q2 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

Q3 Does the allocation differ from the extant planning permission for the site, and if so, is Policy SPN3 justified?

SPN4 – Oxford University Press Sports Ground

Q1 Is the allocation justified and consistent with national planning policy, having particular regard to paragraph 104 of the Framework and the use of open space, sports and recreational buildings and land, including playing fields?

Q3 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

SPN5 – Pear Tree Farm

Q1 What is the latest position regarding development proposals for the site and how does the Plan envisage the parcel coming forward alongside land to the north (in Cherwell District)?

Q2 What evidence is there to indicate that the site is developable within the plan period for the uses proposed?

Q3 How will new walking, cycling and wheeling access through the site, over the footbridge across the railway line to Oxford Parkway Station be provided and by whom?

SPN6 – Red Barn Farm

Q1 What is the latest position regarding development proposals for the site?

Q2 Does Policy SPN6 adequately reflect the most-up-to-date position regarding existing uses on site and is the requirement to re-provide community facilities justified?

Matter 6 – Housing Land Supply

Issue 1 – Total Land Supply

Q1 What is the most up-to-date position regarding the projected supply of housing over the plan period?

Q2 Is the projected supply of housing justified and has sufficient land been identified to ensure that the housing requirement will be met, including an appropriate buffer to allow for changing circumstances on development sites?

Issue 2 – Five Year Housing Land Supply

Q1 What is the five-year housing land requirement?

Q2 Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

Q3 What is the evidence in the Local Plan Housing Land Supply Templates (Large Sites)⁴ based on? How has the Council tested delivery assumptions?

Q4 Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 75 of the Framework?

Q6 Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

⁴ Core Document HEA008a

Matter 7 – Type and Mix of Housing

Issue 1 – Affordable Housing from Other Development Types – Policy H3

Q1 What is the justification for requiring financial contributions towards the delivery of affordable housing from new employment-generating uses? Is this justified and consistent with national planning policy?

Q2 What are the thresholds for affordable housing based on where new student and older persons accommodation is concerned? Does this adequately reflect the viability evidence supporting the Plan?

Q3 How will self-contained older persons accommodation be determined for the purposes of Policy H3? How does this take into account circumstances where high levels of specialist care are being provided, and any associated costs?

Issue 2 – Employer Linked Affordable Housing – Policy H4

Q1 What is the list of sites in Policy H4 based on?

Q2 Is Policy H4 justified, and how will it contribute towards the creation of balanced and mixed communities?

Issue 3 – Dwelling Sizes and Accessible and Adaptable Homes – Policies H5 and HD11

Q1 Is the mix of dwelling sizes required by Policy H5 based on appropriate, available evidence, and does it apply to flatted development schemes?

Q2 What are the thresholds in Policy HD11 based on and are they justified, including the exceptions for flatted schemes up to three storeys or under 50 units?

Issue 4 – Loss of Dwellings – Policy H6

Q1 Is the approach in Policy H6 to the loss of dwellings justified, effective and consistent with national planning policy?

Issue 5 – Houses in Multiple Occupation ('HMOs') – Policy H7

Q1 Given the local housing market context in Oxford and the affordability of property (referred to in the supporting text), is Policy H7 justified?

Q2 What is the justification for criterion b), which requires compliance with good practice guidance which falls outside the scope of the development plan?

Issue 6 – Homes for Travelling Communities and Boat Dwellers – Policies H10 and H11

Q1 What is the justification for Policy H10(a) and is it sufficiently clear what is required of applications for planning permission?

Q2 What is required of Policy H10(f) insofar as the management of sites is concerned? How does this differ from other forms of residential development?

Issue 7 – Older Persons Accommodation – Policy H12

Q1 Is Policy H12 justified, effective and positively prepared in seeking to promote older persons and specialist accommodation types?

Q2 Does the Plan make adequate provision to ensure that needs are met?

Issue 8 – Self Build and Custom Housebuilding – Policy H13

Q1 Is Policy H13 justified, effective and consistent with national planning policy?

Issue 9 – Boarding School Accommodation – Policy H14

Q1 What is the justification for requiring boarding school accommodation to be on or immediately adjacent to the main teaching campus of the school the children will attend?

Matter 8 – Employment and Economic Development

Issue 1 – Community Employment and Procurement – Policy E3

Q1 Is Policy E3 justified and consistent with national planning policy? In particular, are issues such as whether contractors commit to paying the ‘Oxford Living Wage’ justified land use planning considerations for the purposes of the Local Plan? How would it be enforceable and is the policy effective?

Issue 2 – Affordable Workspaces – Policy E4

Q1 What are the list of sites in Policy E4 based on, and what evidence is there to justify the threshold of 5,000 square metres?

Q2 What is the justification for requiring an ‘affordable workspace strategy’ and is it supported by the viability evidence which underpins the Plan?

Q3 Precisely what is required of applicants to meet the requirements of Policy E4 and how will it be enforced? Is the policy effective?

Issue 3 – Hotel and Short Stay Accommodation – Policy E5

Q1 The supporting text to Policy E5 states that the Council seeks to support the visitor economy by encouraging longer stays and higher spend in the city. Is the approach to visitor accommodation in Policy E5 consistent with this strategy and will it be effective in providing additional accommodation?

Matter 9 – Local Services and Facilities

Issue 1 – City, District and Local Centres – Policies C1 and C2

- Q1 How have the centres in Policy C1, and the frontages in Policy C2 been defined and are they justified, based on proportionate evidence and effective?
- Q2 Does the Plan allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, having regard to anticipated needs for retail, leisure, office and other main town centre uses?
- Q3 What is the justification for preventing all hot food takeaway uses outside designated centres?
- Q4 What is the rationale for requiring applicants to look at edge of centre sites well connected to the town centre in Policy C1, is this intended to apply to all planning applications where the sequential test applies?
- Q5 What is the threshold for impact assessments based on in Policy C1? Is it proportionate and justified?
- Q6 How have the thresholds for ‘Active Frontages’ in Policy C2 been established? Are they justified, even in circumstances where units remain vacant and alternative uses would contribute to the vitality and viability of the centre?
- Q7 What is the justification for requiring town centre uses to maintain the thresholds in Policy C2 and promote the vitality of the centre? How would the latter be determined?

Issue 2 – Community Facilities – Policies C3, C4 and C5

- Q1 How would Policy C3 apply to healthcare facilities and proposals for the expansion, replacement or improvement of such facilities?
- Q2 What is the justification for restricting the expansion of local shops in Policy C3?
- Q3 What is meant by Policy C4(d), which states that “*Where possible, joint user and shared user agreements are made*”? Is this requirement effective for development proposals at the planning application stage?

Q4 What is the justification for disapplying Policy C4 to universities? What other Local Plan policies would apply to proposals for their expansion?

Q5 Does Policy C5 apply to sites allocated for mixed-use developments?

Matter 10 – Climate Change

Issue 1 – Net Zero Buildings, Embodied Carbon and Retro-Fitting – Policies R1, R2 and R3

Q1 Is the principle of net zero carbon buildings, including preventing the use of fossil fuels for cooking and heating, justified by available evidence and consistent with national planning policy?

Q2 What evidence is there to demonstrate that the requirements of Policy R1 can be achieved for the development types supported by the Plan, including high-energy uses such as commercial and economic development?

Q3 What is the justification for using a total Energy Use Intensity ('EUI') figure, rather than, for example, a Target Emission Rate ('TER')? What are the EUI targets based on and are they justified and achievable?

Q4 Have the requirements of Policies R1 and R2 been subject to appropriate viability testing? Combined with other policy requirements, will the development proposed by the Plan be viable and developable?

Q5 Is it sufficiently clear what is required of householder planning applications and small scale developments, such as the alteration and enlargement of existing homes?

Q6 What is expected of development proposals under Policy R2a)? Is the policy requirement justified and effective?

Q7 What are the thresholds in Policy R2 based on?

Q8 What is the justification for Policy R3c), which refers to "professional advice"? How does this relate to the acceptability of a development proposal? Is the policy justified and effective?

Issue 2 – Air Quality – Policy R4

Q1 What is the justification for Policy R4, which requires Air Quality Assessments ('AQAs'), for all major developments, regardless of location?

Issue 3 – Water Resources, Soils and Land Contamination – Policies R5, R6 and R7

Q1 What are the thresholds in Policy R5 based on, and are the requirements sufficiently clear, effective and justified?⁵

Q2 Are Policies R6 (Soil Quality) and R7 (Land Contamination) justified, effective and consistent with national planning policy? Are the requirements in Policy R6 applicable to all development proposals, and if so, is this proportionate?

Issue 4 – Flood Risk and Sustainable Drainage – Policies G7 and G8

Q1 Where site allocations are concerned, will development proposals be able to meet the requirements of Policy G7, having particular regard to criterion q) and the restriction of built footprints?

Q2 What is the justification for setting out the requirements for surface water runoff in Policy G8? Would this apply to all development proposals, and if so, is the approach proportionate?

Q3 Is the requirement for compliance with external guidance in Policy G8, which falls outside the scope of the development plan, justified?

Issue 5 – Resilient Design and Construction – Policy G9

Q1 Is it sufficiently clear to users of the Plan what is required of development proposals under Policy G9, such as “*measures to ensure water is used prudently*” and “*supporting infrastructure which is designed to function in extreme weather conditions*”? Is the policy effective?

⁵ Inspectors’ Note – Matter 10, Issue 3 (Water Resources) will focus on the application of Policy R5. Wider consideration of water resources and the infrastructure needed to support the growth in the Plan is addressed under Matter 11, Issue1 (Infrastructure).

Matter 11 – Infrastructure and Viability

Issue 1 – Infrastructure Delivery – Policy S3

Q1 Does the Plan make sufficient provision for infrastructure as required by paragraph 20 of the Framework, having particular regard to infrastructure for transport, water supply, wastewater and community facilities?

Q2 What is the justification for requiring financial contributions towards public transport enhancements, from trip-generating uses within a 1,500m buffer zone of the proposed Cowley Branch Line stations? How has the zone been established and is it based on appropriate available evidence?

Q3 Outside the 1,500m buffer area, what is the justification for Policy S3 stating that proposals will be considered on a case-by-case basis? What is the infrastructure that the policy seeks to deliver and how is this related to the allocations in the Plan?

Issue 2 – Viability – Policy S4

Q1 Does the Local Plan Viability Assessment Update⁶ demonstrate that the growth proposed in the Plan will remain viable across all typologies in all locations?

Q2 The Viability Assessment states that where the cumulative impact of policies is concerned, the results are “...*hugely variable and it is likely that some trade-offs between policy objectives will be required at the development management stage*”. It then goes on to recognise that “...*this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage.*” However, is this approach consistent with the Framework and the PPG? Paragraph 59 of the Framework advocates that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable?

Q3 Is the ‘housing viability cascade’ in Policy S4 justified and effective? In particular, does it prioritise the achievement of ‘net zero’ buildings over affordable housing delivery?

⁶ Core Document SUP.001

Issue 3 – Digital Infrastructure – Policy I1

Q1 Where data centres are concerned, is it sufficiently clear what is meant by “suitable sites in appropriate locations” in Policy I1? Is the policy effective?

Issue 4 – Land Safeguarded for Infrastructure – Policy I2

Q1 Does the Plan adequately and correctly identify land safeguarded for infrastructure so as to avoid conflicts with sites proposed for development?

Matter 12 – Transport

Issue 1 – Transport Assessments – Policy C6

Q1 Policy C6 states that planning permission will only be granted where the City Council is “...*satisfied that necessary transport-related measures will be put in place.*” Is this sufficiently clear to decision-makers, developers and the local community? Is the policy effective?

Q2 Is the test of ‘no unacceptable impact’ on highway safety consistent with national planning policy?

Q3 Are the thresholds in Appendix 7.3 and Policy C6 justified?

Q4 What is required of Delivery and Service Management Plans? In particular, where Policy C6 requires a ‘consideration’ of factors? Is this effective?

Issue 2 – Parking Design Standards – Policies C7 and C8

Q1 Is the approach to parking standards consistent with national planning policy in paragraph 112 of the Framework, which sets out the factors to take into account when setting standards?

Q2 Is the approach consistent with paragraph 113 of the Framework, which explicitly states that maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport?

Q3 What is the justification for requiring compliance with the Oxfordshire County Council Street Design Guide, which falls outside the scope of the development plan?

Matter 13 – Design and Heritage

Issue 1 – Design – Policies S2, HD1 and HD12

Q1 Is it sufficiently clear what is meant by ‘high-quality design’ for the purposes of Policies S2 and HD1? How will these policies be implemented and will they be effective?

Q2 Is it clear to users of the Plan what the submission of a compliant constraints and opportunities plan would entail? What is the justification for this approach and is the policy sufficiently flexible to be effective? Has this requirement been adequately tested to ensure that it is viable and deliverable?

Q3 Are the requirements in Policies S2, HD1 and HD12 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Issue 2 – Density, Views and Building Heights – Policies HD2 and HD6

Q1 What are the implications of the approach towards greater densities in Oxford? Would this lead to more tall buildings in the city? How has the High Buildings Study⁷ been considered in formulating this approach?

Q2 Is Policy HD2 sufficiently clear in relation to what is expected of the density of development and what the implications of higher densities could be? Should the Plan include a minimum density standard for city and town centres and other locations that are well served by public transport, consistent with paragraph 130 of the Framework?

Q3 Is the delivery of Policy HD2 over-reliant on flatted developments? How much of this type of accommodation been delivered in the city in the last five to ten years and how does it relate to identified housing needs?

Q4 How would Policy HD6 ensure that very high-density developments would not harm views of the historic skyline in the Historic Core Area? Is Policy HD6 sufficiently clear what is expected of applications for planning permission in respect of tall buildings that would exceed 15 metres in height?

Q5 Are the requirements set out in policies HD2 and HD6 justified, consistent with national planning policy and based on robust, up to date

⁷ Document HER.001b

evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Issue 3 – Heritage Assets and Archaeology – Policies HD3, HD4 and HD5

Q1 Are the Plan's heritage policies consistent with the approach to conserving heritage assets in the Framework, having particular regard to the tests in paragraphs 213-216?

Q2 Are Policies HD3, HD4 and HD5 positively prepared, justified, effective and consistent with national planning policy?

Issue 4 – Health Impact Assessments – Policy HD7

Q1 Is Policy HD7 justified, effective and consistent with paragraph 96 of the Framework, which requires planning policies to aim to achieve healthy, inclusive and safe places?

Q2 Would a separate Health Impact Assessment be necessary for all site allocations? If so, would this requirement consistent with Public Health England Guidance⁸ which advises that health impact assessments are a useful tool to use where there are expected to be significant impacts?

Q3 Is it sufficiently clear what is meant by 'large scale development' for the purposes of Policy HD7? How will the policy be implemented and how will it be effective in this regard?

Q4 Is Policy HD7 sufficiently clear how any potential adverse health and wellbeing impacts from residential or other development that is not 'large scale' would be dealt with? Is the policy effective in this regard?

Issue 5 – Living Conditions – Policies R8, HD8, HD9 and HD10

Q1 Policy R8 states that planning permission will not be granted for sensitive development close to the Sewage Treatment Works, unless it is accompanied by a technical assessment, prepared in consultation with Thames Water, that shows there will be no adverse amenity impact on future occupiers of the proposed development or that sufficient mitigations can be incorporated to ensure that any potential for adverse impact will be avoided. What is the

⁸ Health Impact Assessment in spatial planning - A guide for local authority public health and planning teams 2020

justification for this requirement and is the policy sufficiently flexible enough to be effective?

Q2 Is it sufficiently clear what is meant by 'sensitive development' for the purposes of Policy R8? How will the policy be implemented and how will it be effective?

Q3 Are the requirements set out in policies HD8, HD9 and HD10 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Matter 14 – The Natural Environment

Issue 1 – Green and Blue Features – Policy G2

Q1 Are the requirements in Policy G2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have they been adequately tested to ensure that they are viable and deliverable?

Issue 2 – Urban Greening Factor – Policy G3

Q1 Is it sufficiently clear what is meant by “*an appropriate proportion of natural green surface cover*” for the purposes of Policy G3? How will the policy be implemented and how will it be effective?

Q2 Is it clear to users of the Plan what the submission of a completed Urban Greening Factor assessment would entail? What is the justification for this requirement and is it sufficiently flexible enough to be effective?

Q3 Are the requirements set out in Policy G3 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Issue 3 – Biodiversity Net Gain – Policy G4

Q1 What is the justification for the biodiversity net gain requirement in Policy G4? What information is available to demonstrate that the target can be achieved and that it would not undermine development viability?

Issue 4 – Biodiversity, Ecological Enhancements and Ecological Networks – Policies G5 and G6

Q1 Are the requirements set out in Policy G5 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Q2 Is Policy G6 justified, effective and consistent with paragraph 187 of the Framework, which requires planning policies to protect and enhance sites of biodiversity and minimise impacts on biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species?