

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

OXFORD LOCAL PLAN 2045

OXFORD CITY COUNCIL

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

Matter 5: Site Allocations

Issue 1

Issue 1 – West End and Botley Road Area of Focus

Explanation of the structure of the sites chapter

As briefly set out in response to Matter 4, Issue 1, Question 9, the site allocations within this chapter of the Local Plan have been organised alphabetically within the four infrastructure areas for Oxford. These infrastructure areas are identified in the map on page 144 of the Local Plan and on the Policies Map (CSD.007). The site allocation policies are also named according to the infrastructure area they are located within, for example in the case of the SPCW policies, "SP" stands for Site Policy while the "CW" stands for Central and West. The following table sets out the infrastructure areas, their corresponding site allocation policy coding, and also includes any areas of focus that are contained within each infrastructure area.

	LP2045 pages	**Site Policy ref:**	**Area of Focus (AOF):**	**Sites within AOF:**	**Sites outside of the AoF (but inside Infrastructure Area)**
North Infrastructure Area	146-161	SPN1-6	Northern Edge of Oxford (NEAOF)	SPN3 SPN4 SPN5 SPN6	SPN1: Diamond Place and Ewert House SPN2: Elsfield Hall, Elsfield Way
South Infrastructure Area	161-201	SPS1-17	Cowley Branch Line (CBLAOF)	SPS2 SPS7 SPS9 SPS10 SPS11 SPS12 SPS13 SPS17	SPS1: 474 Cowley Road SPS3: Bertie Place Rec SPS4: Cowley Marsh Depot SPS5: Crescent Hall SPS6: Former Iffley Mead Playing Field SPS8: Land at Meadow Lane SPS14: Redbridge Paddock SPS15: Sandy Lane Rec SPS16: Templars Square
East Infrastructure Area	201-240	SPE1-18	Marston Road and Old Road (MRORAOF)	SPE1 SPE3 SPE6 SPE10 SPE11 SPE18	SPE2: East Oxford Bowls Club SPE4: Jesus College Sports Area SPE5: John Radcliffle Hospital SPE7: Lincoln College Sports Ground SPE8: Manzil Way resource Centre SPE9: Marston Paddock Extension SPE12: Rectory Centre SPE13: Ruskin Campus SPE14: Ruskin Field SPE15: Slade House

					SPE16: Thornhill Park (phase 2) SPE17: Union Street Car Park
Central and West Infrastructure Area	241-277	SPCW1-12	University Areas North of the City Centre (NCCAOF)	SPCW1 SPCW12	SPCW2: Botley Road sites SPCW3: Canalside Land SPCW4: Faculty of Music SPCW5: Jowett Walk SPCW6: Manor Place
			West End and Botley Road (WEBRAOF)	SPCW7 SPCW8 SPCW9 SPCW10 SPCW11	

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

As set out in the City Council's written response to Matter 3 at the Stage 1 Hearings, the City Council designed the Areas of Focus as a locally-specific policy tool to help deliver the spatial strategy. They are areas where significant changes are anticipated over the Plan period resulting from new development - either development within the city or in combination with development adjacent to the city boundaries. 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.

It is considered that the Policy WEBRAOF is justified as its content is evidence-based. The specific criteria identified within criteria a) to n) have all been formulated having had regard to documents contained within the Local Plan 2045 evidence base. These included the following:

- Infrastructure Delivery Plan (CSD.006)
- High Buildings TAN (HER.001a) and Evidence Base Report (HER.001b)
- View Cones Study (HER.002)
- A Character Assessment of Oxford in its Landscape Setting (HER.003) and 2022 Update Addendum Report (HER.004)
- Botley Road Retail Park Development Brief TAN (DEV.001)
- Local Cycling and Walking Infrastructure Plan (LIV.009) and associated network map (LIV.010)
- OxRail 2040 Plan for Rail
- Oxford City Council Air Quality Management Order (RES.007), Air Quality Action Plan (RES.008) and Air Quality Planning Guidance (RES.009)

- Adopted Oxford West End and Osney Mead SPD (DEV.002), which includes the West End Design Guide (DEV.003), Spatial Framework (DEV.004) and Appendices (DEV.005).

As such, we consider that Policy WEBRAOF is justified as it forms an appropriate strategy informed by proportionate evidence.

The criteria within Policy WEBRAOF are considered to be both effective and consistent with national policy. Criteria f), h), k) and n), signpost relevant documents outside of the Local Plan including Oxfordshire County Council's Local Walking and Cycling Infrastructure Plan (LIV.009), and the West End and Osney Mead SPD (DEV.001). These four criteria all seek to ensure that other Oxford City Council planning documents and Oxfordshire County Council Local Transport and Connectivity Plan documents are all given appropriate consideration where relevant. To ensure that the plan is deliverable over the plan period, modifications are proposed to future-proof the plan and to ensure its effectiveness and ensure consistency with National Policy.

The following modifications are proposed to Policy WEBRAOF:

Urban design and heritage

f) Development opportunities at the Botley Road Retail Park ~~in line with~~ should have regard to the guidance set out in the Botley Road Retail Park Development Brief TAN.

Movement and Access

h) Optimised connectivity and permeability for people wishing to walk, cycle or wheel in the area to other parts of the city. Walking, cycling and wheeling infrastructure improvements ~~must be delivered in accordance with~~ should have regard to the requirements of the Oxford Local Cycling and Walking Infrastructure Plan (or future equivalent).

Infrastructure

k) The redevelopment of Oxford Station to deliver a strong sense of arrival to Oxford and an improved environment for passengers ~~aligning with~~ having regard to the principles and priorities outlined in OxRail 2040: Plan for Rail or future equivalent).

n) Public realm improvements should have regard to ~~undertaken in line with~~ the infrastructure interventions set out in the West End and Osney Mead SPD.

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?

The boundary of the West End and Botley Road Area of Focus is based on a number of existing and emerging policy considerations.

The regeneration of the 'west end' of the city centre has been a long-term ambition of the City Council. Historically, its boundary was defined within Oxford's development plan first through the West End Area Action Plan (adopted 2008). More recently, extant Local Plan 2036 (DPL.001) retained this area as the redline boundary as part of site allocation Policy SP1 - West End Sites.

Elsewhere in the Local Plan 2045, the review of the city centre area (Policy C1) has resulted in some extensions to the boundary of Oxford city centre. A small extension to the city centre boundary is proposed to include the western entrance to the railway station, which is currently under construction. This represents a logical extension to the city centre. The Plan also proposes to extend the city centre to include the entire of the Osney Mead site allocation (Policy SPCW8), which is also one of the city's Key Employment Sites. This extension is to reflect and encourage the anticipated changes at this site over the course of the plan period. Accordingly, the boundary of the West End and Botley Road Area of Focus also includes these areas.

The Botley Road Retail Park and the adjacent 234 Botley Road both benefit from Key Employment Site status. This area has been undergoing a transformation from a late-20th century retail park to a modern urban science district. As Key Employment Sites that form the western boundary of the city which are bringing forward Use Class E employment uses, it is important that they contribute to the delivery of some of the wider public realm and infrastructure-related initiatives in order to help manage their transition and to enable their effective integration into the city.

The West End and Botley Road Area of Focus, includes the following five site allocations:

- SPCW7 Nuffield Sites
- SPCW8 Osney Mead
- SPCW9 Oxford Railway Station and Becket St Car Park
- SPCW10 Oxpens
- SPCW11 St Thomas School and Osney Warehouse

Out of the other seven site allocations are located elsewhere in the Central and West Infrastructure area, two are located within the University Areas North of the City Centre Area of Focus (NCCAOF). The NCCAOF is the other Area of Focus Policy included within the Central and West Infrastructure Area.

SPCW1 – Banbury Road University Sites (Parcel B)

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

The position as set out in HEA.008a (page 38) is substantively unchanged. Planning permission was granted on 29 November 2024, and conditions are being discharged. The estimated start on site date not yet known by the landowner. The landowner estimates delivery across the periods 2025/26-29/30 and a latter phase in period 2035/36 - 39/40.

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

Landowners Hertford College and University of Oxford re-confirmed intention to develop when contacted (in 2026) about site deliverability, and pre-commencement conditions have started being discharged.

SPCW2 – Botley Road Sites including River Hotel and Westgate Hotel

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

The three individual parcels of land within this proposed site allocation are all in the same landownership. The landowner confirmed in 2025 (as set out in SHLAA Table A HEA.003b A07) their intention to bring forward a 'wider' development, which includes the redevelopment of all three sites collectively and in a coordinated manner.

While collectively the site allocation is for a minimum of 20 dwellings, each individual parcel of land is relatively small (one of the parcels is less than 0.25ha). The individual capacity of each parcel of land that makes up the site allocation would be less than ten dwellings, as such, individually, these sites would not meet the minimum requirements for a site allocation. The City Council considers that they ought to be allocated collectively for these reasons.

Care has been taken however to ensure that these sites are handed carefully in the SHLAA. Paragraph 2.4.15 (PDF page 22) of the SHLAA Main Report (HEA.003a) sets out, that a zero capacity has been included within some rows of SHLAA Table B. This is because this site allocation policy covers a group of sites that the landowner is intending to develop collectively. As such, one of the rows in SHLAA Table B includes the overall capacity for the three sites, while the other rows relating to the remaining sites include a zero capacity.

This was considered appropriate because it provides a flexible approach to delivering a mix of uses across a number of sites. It is worth noting that at the time of writing the landowner's proposals for these sites were not at a sufficiently advanced stage to be able to provide an accurate residential capacity at each of the three component sites. It also acknowledges the fact that the minimum number of residential dwellings allocated in Policy SPCW2 could be delivered across the three sites in a variety of different ways.

A practical rationale also exists for considering site capacities in this way - it avoids double counting. Finally, the collective allocation of the sites in Policy SPCW2 enables a more detailed consideration of certain location-specific issues including flood risk and heritage considerations. These are set out in more detail in the site capacity assessment for this site (CAP.043).

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

The position as set out in HEA.008a (page 39) is substantively unchanged. This site allocation comprises 3 proximate sites expected to be delivered together. The land parcels are all currently in use as residential, hotels, and retail. All under the same landowner. Landowner estimates delivery in the period 2030/31 - 2034/35.

Landowner Christchurch College re-confirmed intention to develop when contacted (2026) about site deliverability.

A modification is suggested which reflects the agreed position between Oxford City Council and Network Rail contained Statement of Common Ground with Network Rail (COM.013). This comprises the addition of new heading under criterion k) and addition of new criterion l) as follows:

Additional requirements

*l) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise (**Policy R8**).*

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?

The policy expectation for the River Hotel and Westgate Hotel, as registered non-designated heritage assets on the Oxford Heritage Asset Register, is that they should be carefully considered as part of any development proposals at the site. Policy HD4 of the Local Plan 2045 sets out the expectations for applicants and decisionmakers when dealing with planning applications involving non-designated heritage assets.

Historic England submitted formal representations (008 REP.3-081) at the Regulation 19 consultation stage. These representations expressed concern that Policy SPCW2 was unsound as drafted as it did not set out the approach anticipated at the development management stage for addressing the non-designated heritage assets listed in the policy box.

An agreed position was reached to satisfactorily overcome the representations from Historic England. This has been recorded in a signed Statement of Common Ground (COM.015). PDF Page 12 of COM.015 sets out the agreed position between the City Council and Historic England in relation to Policy SPCW2.

As such, the City Council would like to propose the following modification to Policy SPCW2:

*e) Development proposals should be designed with consideration of their impacts on the setting of the Osney Town Conservation Area (**Policy HD3**), as well as the non-designated heritage assets identified on the OHAR (Policy HD4).*

Within Policy SPCW2, Historic England also suggested that criteria f) and h) could be combined. An agreed position was reached as set out in the signed Statement of Common Ground with Historic England (COM.015).

Accordingly, the City Council would like to propose the following modification to Policy SPCW2:

Delete criterion h) and update subsequent lettering.

Update criterion f) to incorporate former text from criterion h) as follows:

*f) The Boar's Hill view cone covers the entire site allocation. Proposals should be designed in a way that responds to this protected view. Additionally, proposed development that exceeds the height stated in the Appendix 6.4 may have an impact on the Historic Core Area and so will be required to provide an LVIA so that full impacts can be understood and assessed (**Policy HD6**).*

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

The site lies within Flood Zone 3a, however, when taking account of climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for this site (GRE.016) shows that

will be in Flood Zone 3b in the future, with the northern parcels of the site allocation at highest risk of flooding. This site is brownfield and paragraph 5.7 of Background Paper 007: Flood risk, SuDS and drainage (BGP.001h) acknowledges that whilst national policy and guidance states that development would not normally be appropriate because of the high risk of flooding and loss of storage space that would incur, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within Flood Zone 3b. Paragraphs 5.8 and 5.9 of BGP.001h details that a pragmatic approach would continue to be undertaken (similar to current Oxford Local Plan 2036) which allows brownfield land in Flood Zone 3b to be redeveloped. However, there are several requirements in Policy G7: Flood Risk and Flood Risk Assessments that would need to be met for development to be acceptable and to ensure safety and improvements to flood risk management. An increase in flood risk vulnerability classification would not be permitted, although part of this existing site contains residential development, therefore the allocation for residential-led development is suitable in principle in relation to flood risk.

As required by national policy (2024 NPPF, paragraph 172), a flood risk sequential test (GRE.017) was carried out to demonstrate that the use of sites in areas of higher flood risk was justified by there not being sufficient available sites at lower risk of flooding. Where sites in areas of higher flood risk are justified through the sequential test, it is also necessary to apply the exceptions test. The exceptions test can only be fully passed in relation to a detailed proposal; however, the Level 2 SFRA assessment for this site (GRE.016) includes an assessment as to whether it is likely the exceptions test can be passed and this concluded that it was likely that it could be passed.

Paragraphs 173-175 of the 2024 NPPF state that a sequential approach should also be considered on individual sites. Criterion a) of Policy SPCW2 has regard to this as it notes that a sequential approach should be taken to locating development on the site, with more vulnerable uses located away from the highest flood risk. Policy SPCW2 also explicitly requires that in line with Policy G7 (Flood Risk and Flood Risk Assessments), a site-specific Flood Risk Assessment

(FRA) is to be undertaken and that it should consider onsite routes and any infrastructure required to reach the access route.

In conclusion, and based on the above process that was undertaken, it is considered that the allocation is justified having regard to local and national 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?

The position set out in Local Plan Housing Land Supply Templates (Large Sites) (HEA.008a) remains predominantly unchanged with the exception that Worcester College have since purchased the parts of site previously owned by Cheer Team.

Additionally, in March 2026 (prior to the announcement of the new landowners) the Council received approval from Cabinet to confirm a willingness to, if necessary, and as a last resort, use its Compulsory Purchase Order (CPO) powers to acquire the site with an appointed development partner. Before any CPO process could be instigated, a further report would need to be submitted to Cabinet to set out the details of the proposals and that the relevant legal and policy tests are met on the basis of the circumstances as they exist at that time, together with a recommendation to Council to seek approval for a budget to be redeemed from the development partner. However, the consideration of using CPO powers indicates a serious commitment to facilitating future development on this site.

The expected mix reflects the long-standing allocation on the site which has been reviewed through the preparation of the Local Plan 2045 (see also: Matter 5, Issue 2, Q4 below). Notably, the recent appeal (APP/G3110/W/22/3308048) established that the mix proposed in the existing policy could be achieved, which has not significantly altered in the proposed policy wording and arguably, is more achievable now considering the revised policy wording in SPCW3.

Additionally, it is worth noting that Policy SPCW3 does not have a minimum number of residential dwellings included. A minimum capacity of 10 units has been identified or the site would not have been included as an allocation. A modification is proposed to bring this assumption into the policy as follows:

Planning permission will be granted for a mixed-use development at the Canalside Land site that includes the following:

- *Residential dwellings and/ or student accommodation ;*
- *A community centre to replace the existing Jericho Community Centre on Canal Street;*
- *Public open space;*
- *Replacement operating boatyard;*
- *Electric charging points for mooring boats;*

The minimum number of dwellings to be delivered is 10 (or if delivered as non-self- contained student accommodation, the equivalent number of rooms when the ratio is applied).

Other complementary uses will be considered on their merits.

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?

The Habitat Regulations Assessment (CSD.005) provides the Stage 2 Appropriate Assessment with regards to potential recreational disturbance impacts at the Oxford Meadows SAC.

Natural England has confirmed that the Schedule 5 plant species – Creeping Marshwort – is not particularly sensitive to trampling but is sensitive to dog-fouling. Given the proximity of this site (circa 500m) and the site's allocation for a mix of uses including residential, the HRA recommended a precautionary approach to mitigation.

Paragraph 6.30 of CSD.005 therefore recommends the inclusion of policy wording to ensure that residential development proposals that could result in an increase in dogwalkers, would not give rise to any likely significant effects at the Oxford Meadows SAC. This text forms criteria c) of Policy SPCW3 – Canalside Land, Jericho (CSD.001).

It is worth noting that this text was adapted from extant Policy SP33 – Canalside Land (DPL.001).

As part of the extant planning permission, a project level HRA was carried out which assessed the potential recreational impacts of the proposed development on the Oxford Meadows SAC. The conclusions of this project level HRA were in line with advice previously received from the Oxfordshire Flora Group – that the provision of dog waste bins to serve the Oxford Meadows SAC would be an appropriate form of mitigation.

Given the above, the City Council would like to propose the following modification to ensure that the policy is clear and effective:

Amend paragraph c) of the policy as follows:

c) Development proposals should be accompanied by an assessment of potential recreational pressure on ~~the immediate setting including the canal towpath and~~ the Oxford Meadows SAC that may arise from increased numbers of visitors, in particular dogwalkers, and that proposes appropriate mitigation. ~~along with plans to mitigate this impact, as necessary.~~ It is expected that mitigation would be achieved through contributions for the provision of dog waste bins to serve the Oxford Meadows SAC. Where alternative mitigation is proposed, this should be appropriately justified.

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

The site lies partly within Flood Zone 3b, and when taking account of climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for this site (GRE.016) shows that more of the site will be in Flood Zone 3b in the future, with around 31% of the site expected to be inundated. This

site is brownfield and paragraph 5.7 of Background Paper 007: Flood risk, SuDS and drainage (BGP.001h) acknowledges that whilst national policy and guidance states that development would not normally be appropriate because of the high risk of flooding and loss of storage space that would incur, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within Flood Zone 3b.

Paragraphs 5.8 and 5.9 of BGP.001h details that a pragmatic approach would continue to be undertaken (similar to current Oxford Local Plan 2036) which allows brownfield land in Flood Zone 3b to be redeveloped. However, there are several requirements in Policy G7: Flood Risk and Flood Risk Assessments that would need to be met for development to be acceptable and to ensure safety and improvements to flood risk management. An increase in flood risk vulnerability classification would not be permitted. The current use of the site is a boat hire facility, open space and derelict workshops. The allocation is for a mixed-use development which would be suitable in principle in relation to flood risk, as the residential element (which could contain student accommodation) can be located outside of Flood Zone 3b.

Appendix A (see PDF pages 20-22) of the signed Statement of Common Ground with the Environment Agency (COM.008) sets out the concerns they still have with the scale of development proposed on the site, the lack of available space for compensation remaining, as well as a general lack of more specific details such as access and egress requirements. A minimum number for this site was not proposed in Policy SPCW3, but for the purposes of the assessment, the Level 2 SFRA (GRE.016) assumed the minimum number of dwellings to be delivered would be 18, established by the existing allocation in the Oxford Local Plan 2036 and the previously allowed appeal decision (APP/G3110/W/22/3308048) that expired in early 2026. Both established that the mix in the existing policy could be achieved, which has not significantly altered in the proposed policy.

More recently, part of the site ownership has changed, with Worcester College now owning a significant proportion of this site, as well as the greenfield land immediately adjacent to this site, where there is potential to provide suitable compensation to address the lack of space on the site to mitigate flood risk.

This is a brownfield site where a large proportion of the site lies within Flood Zone 2, with the highest levels of flood risk more limited towards the western boundary of the site, adjacent to the Oxford canal. Much of the existing site area comprises impermeable hardstanding and there is an opportunity to significantly improve the management of flood risk both on and off-site if the site is redeveloped. The capacity of this site has been considered through the Canalside Land, Jericho Site Capacity Assessment (CAP.044).

As required by national policy (2024 NPPF, paragraph 172), a flood risk sequential test (GRE.017) was carried out to demonstrate that the use of sites in areas of higher flood risk was justified by there not being sufficient available sites at lower risk of flooding. Where sites in areas of higher flood risk are justified through the sequential test, it is also necessary to apply the exceptions test. The exceptions test can only be fully passed in relation to a detailed proposal; however, the Level 2 SFRA assessment for Canalside Land, Jericho (GRE.016) includes assessment as to whether it is likely the exceptions test can be passed and this concluded that it was likely that it could be passed.

Paragraphs 173-175 of the 2024 NPPF state that a sequential approach should also be considered on individual sites. Criterion g) of Policy SPCW3 has regard to this as it notes that a sequential approach should be taken to locating development on the site, with development prioritised first within Flood Zone 1 prior to consideration of any siting within Flood Zone 2 or 3a. Policy SPCW3 also explicitly requires that in line with Policy G7 (Flood Risk and Flood Risk Assessments), a site-specific Flood Risk Assessment (FRA) is to be undertaken and that it should consider onsite routes and any infrastructure required to reach the access route.

In conclusion, and based on the above process that was undertaken, it is considered that the allocation is justified having regard to local and national 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?

The application site has been a long-standing site allocation which has been subject to a number of consented schemes, none of which have been implemented. The site allocation was historically informed by the Jericho Canalside SPD (withdrawn in June 2020) which set out a number of infrastructure requirements for the site. These were reflected in the Local Plan 2036 Policy SP33 (Canalside Land) with the following wording:

"Planning permission will be granted for a mixed-use development at the Canalside Land that includes all of the following uses:

a) residential
b) a sustainably-sized community centre
c) public open space/square
d) replacement operating boatyard and winding yard
e) a new bridge over the Oxford Canal for pedestrians and cyclists"

In drafting Policy SPCW3 officers have been mindful of these historic requirements and the various issues that have arisen during the assessment of planning applications in recent years. Consequently, a full review of the site allocation was taken to establish whether the historic infrastructure requirements were still required and whether these were justified.

Policy SPCW3 requires the following elements and land uses:

- Residential dwellings;
- A community centre to replace the existing Jericho Community Centre on Canal Street;
- Public open space;
- Replacement operating boatyard;
- Electric charging points for mooring boats;

The requirement for a community centre results from a long established need identified in both the adopted Local Plan 2036 and the earlier, now superseded, Sites and Housing Plan 2011-2026 (Policy SP7).

The existing community centre in Canal Street occupies a converted three storey Victorian building. It has been identified as being inappropriate for this use in particular because of the absence of a large hall, the difficulty of accessing upper floors where no lift is available and hence lack of compliance with the Disability and Discrimination Act (DDA) 2004 and lack of outdoor play space for a pre-school play scheme. To bring the building up to DDA requirements would not be viable and would be counterproductive in terms of the resulting loss of space. The current community centre is constrained in terms of internal layout and lack of external space and the building itself is in a poor state of repair. As such, there is an established need for a new community centre in this location which could be delivered as part of the redevelopment of the Canalside site allocation. The expectation for the landowner/developer to provide the community centre in conjunction with £200,000 of funding which has been secured and ringfenced to help support the delivery of a future community centre on this site. The £200,000 has been secured via s106 contributions and capital funding.

As set out in the policy, public open space is required from future development proposals. It is anticipated that due to the flood zone constraints there will be areas where built form would be unacceptable which could be utilised as the public open space. Additionally, the requirement for an operating boatyard would result in additional areas of open space being beneficial to support that use. As such, the policy details the need to ensure that the open space is multifunctional and can support the community and boatyard uses while also providing opportunities for enhancements to the setting of the St. Barnabus Church heritage asset. It was considered in drafting the site allocation policy that additional guidance on how to best make use of this constrained site would be beneficial to users of the plan and would help to ensure that future development proposals could be successful where other historic schemes on this site have not been. The policy requires the open space to be delivered by the developer of the site.

The closure in 2007 of the Castle Mill boatyard on this site left a deficiency in boatyard provision on this part of the Oxford Canal where there has been boat building and repairs since the 1960s and there has been a wharf since at least 1842. There are limited facilities for boat dwellers/ users in and around the city with the closest comprehensive facilities being at Bossoms Boatyard in Binsley and Tooleys in Banbury, both outside of the city boundary. The requirement for a replacement operating boatyard and electric charging enabled moorings is therefore included to provide additional facilities within the city. A boatyard would also constitute a water-compatible use which could be accommodated as part of a mixed-use development on this site.

There is no requirement in the proposed policy for a bridge crossing, however, as set out in paragraph l) there is an expectation that development proposals improve connections into and around the site. This could be from enhancements to the existing bridge crossing which is located to the north of the site, or from a replacement bridge crossing. Paragraph j) which relates to the public open space, requires that consideration is given to how a new bridge crossing could be accommodated within the open space and ensures that the design of the open space wouldn't prevent the delivery of a new bridge crossing, should this form part of a future development proposal. The policy wording therefore, seeks to support improvements to pedestrian connections into and around the site but provides flexibility as to how this can be

delivered. This is in direct response to issues arising in historic planning applications about delivery of a new bridge; the intention with Policy SPCW3 is to provide more flexibility with regards to delivering connectivity improvements.

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)?

The position as set out in HEA.008a (page 43) is substantively unchanged. Planning permission was granted in January 2026 (25/01872/FUL) for 62 graduate rooms (33 C3 equivalent). As at end of October 2026, 1 pre-commencement condition has been discharged and a start on site date is not yet confirmed.

As noted in the consultation summary (page 387 of CSD.003 - Appendix 3), a minor discrepancy was identified at Regulation 19 stage, between the red line of the planning permission and the red line of the site allocation. The conclusion was that the basemap display of the site arranges the buildings into simple blocks that aren't always a true reflection of what is on the site. Aerial photography confirms that the site boundary, as is, does capture all the buildings on the site and is therefore correct.

Landowner Christchurch College re-confirmed intention to develop when contacted (2026) about site deliverability.

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?

The site is situated within a sustainable location in the heart of the city centre. It benefits from numerous sustainable transport options in the immediate vicinity, including several bus stops along St Aldate's which head in various directions across the city and beyond. Reliance on private vehicles is therefore not required in this type of location. The site currently has several parking spaces on Floyds Row, some of which could be removed to provide wider benefits to the site such as improving permeability for walkers, cyclists and wheelers and enhancing the natural environment. It is expected that the reduced level of parking will still be able to sufficiently provide enough space for disabled parking and servicing the site.

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?

The site currently in use as a house, gardens and car park. The position as set out in HEA.008a (page 44) is substantively unchanged, a full planning application is expected in early 2027. The landowner estimates delivery before 2029/30, but because no planning permission is yet in

place, this site is presented later in the overall trajectory (2034/35). The landowner, Merton College, re-confirmed intention to develop when contacted (2026) about site deliverability.

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".

This site would meet the criteria identified in Policy C8: Motor Vehicle Parking Design Standards for residential developments that are low car. This means that no car parking spaces allocated to a particular housing unit, but only a shared number for blue badge holders, pooled cars/car club, servicing and delivery vehicles, and for working drivers such as NHS community staff. As such this is identified in the site allocation policy.

However, it is recognised that there is an error in the drafting and so a modification is proposed to the first paragraph of the policy to correct this as follows:

Proposed modification:

Planning permission will be granted for student accommodation or ~~car free~~ low car residential development or a mix of both uses.

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?

Paragraph 219 of the NPPF is supportive of development in Conservation Areas (CAs) where it preserves the elements of the heritage setting that contribute positively to the CA's significance and its heritage assets. The allocation policy clearly references the Central (University & City) Conservation Area and the site's locations within this. The Policy also provides urban design and heritage criteria to ensure that any proposed development takes account of the special character of the CA and in particular the visual and physical connections between important, surviving, historic elements. These criteria seek to ensure that development will contribute positively to the setting of the CA, in line with paragraphs 203 and 219 of the NPPF. Where possible specific features such as the hedged boundaries which contribute to the semi-rural character of the setting are identified for retention.

The site also lies within the City Centre Archaeological Area, and as the policy requires that archaeological assets are appropriately investigated and responded to, preserving the Royalist Civil War rampart and ditch line in situ, in line with policy HD5 (Archaeology).

Policy SPCW6 also states that built development should be informed by the local context in its design, size and alignment, materials and construction details, in order to preserve the visual and physical connections between historical elements that contribute to the character of the CA, and the surrounding listed buildings. The Site Capacity Assessment (CAP.047) finds that

the site is capable of being developed to its expected capacity with respect to these heritage considerations, such as by echoing neighbouring block sizes appropriate of the city centre.

For consistency and clarity, to ensure effectiveness, a number of modifications are proposed to ensure relevant heritage assets are properly noted within the policy, as follows:

Amendment to 'Notable heritage assets' section in summary box above the policy, as follows:

...It is adjacent to Magdalen College Grade I Registered Park and Garden and the Landscape at St Catherine's College Grade I Registered Park and Garden. The site is in line with...

Amendment to criterion e) as follows:

e) The hedged boundaries are an important characteristic of the area and should be retained, as should the mature trees and areas of trees in the northern and southern corners, helping retain the green, semi-rural character of the setting as well as screening the site and providing a buffer to the highly graded designated heritage assets within St Catherine's College.

Amendment to current criterion f) as follows:

*f) ~~Development should seek to preserve the special character of the conservation area within which it lies~~ Development proposals must be designed with consideration of their impacts on the setting of the Central Conservation Area, the setting of the nearby listed buildings and views, and the setting of the two adjacent Registered Park and Gardens (**Policy HD3**). The size, alignment and design of any proposed development should take account of the importance of preserving the visual and physical connections between important, surviving, historic elements.*

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?

Policy SPCW6 clearly identifies that the site falls within the identified impact risk zone for the New Marston Meadows SSSI. A Source Pathway Receptor Analysis (SPRA) has been carried out to investigate potential hazards (sources) and pathways to SSSIs, and mitigations (GRE.006). The New Marston Meadows SSSI is protected due to the specific grassland and fen species it hosts, as set out in Table 4 of GRE.006. The New Marston Meadows SSSI has been identified as being sensitive to changes in the flows and quality in the River Cherwell, due to being on its flood plain. The site is downstream of the SSSI; however, it is not the case that a development can't have any upstream impacts on river flow. It is therefore important that the potential impacts of development proposals are understood and mitigated. Therefore, the policy requires that an assessment of groundwater and surface water impacts is required and sustainable drainage systems with an acceptable management plan should be incorporated. These actions ensure any potential negative effects are mitigated.

Other than potential impacts on the flow of the river Cherwell, there are no other identified pathways to impact on the New Marston Meadows SSSI. Therefore, the application of the required mitigations set out in the policy will ensure the SSSI is not negatively affected. There is no reason these requirements wouldn't be achievable on this site. Surface water runoff in the

area can be reduced with natural drainage features and there are a wide variety of possible interventions such as rainwater harvesting, infiltration basis, rain gardens and swales.

A buffer is required by policy G2 alongside the watercourse, and the following modification is proposed to reference this in the Policy SPCW6:

Insert new criterion f) under "Open space, nature, flood risk" heading.

*f) A buffer should be retained along the watercourse (**Policy G2**).*

Subsequent criterion to be re-numbered accordingly.

SPCW7 – Nuffield Sites

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

The policy states that permission will be given for "a minimum number of 59 dwellings (net gain) (or if delivered as student rooms, the equivalent number of rooms when the relevant ratio is applied)". The approach has been taken in a number of the site allocation policies to reference a net gain of dwellings where there are existing habitable residential units on site currently. This is to clarify that the policy requirement is for a net gain of dwellings rather than a total gross provision. It is considered that this gives clarity to the reader of the Plan.

A modification is proposed within the policy box to clarify that the current uses across the three sites include residential uses.

Current Use(s): Mix of uses across the three sites including hotel, employment, residential, ground floor retail, cafes and surface level car park.

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?

The three individual parcels of land within this proposed site allocation are all in the same landownership. The landowner confirmed in 2025 (as set out in SHLAA Table A HEA.003b A07) their intention to bring forward the three sites within SPCW7 together to facilitate a general improvement to the area.

Care has been taken however to ensure that these sites are handed carefully in the SHLAA. Paragraph 2.4.15 (PDF page 22) of the SHLAA Main Report (HEA.003a) sets out, that a zero capacity has been included within some rows of SHLAA Table B. This is because this site allocation policy covers a group of sites that the landowner is intending to develop collectively. As such, one of the rows in SHLAA Table B includes the overall capacity for the three sites, while the other rows relating to the remaining sites include a zero capacity.

This was considered appropriate because it provides a flexible approach to delivering a mix of uses across a number of sites. It is worth noting that at the time of writing the landowner's proposals for these sites were not at a sufficiently advanced stage to be able to provide an

accurate residential capacity at each of the three component sites. It also acknowledges the fact that the minimum number of residential dwellings allocated in Policy SPCW7 could be delivered across the three sites in a variety of different ways.

A practical rationale also exists for considering site capacities in this way - it avoids double counting. Finally, the collective allocation of the sites in Policy SPCW7 enables a more detailed consideration of certain location-specific issues including flood risk and heritage considerations. These are set out in more detail in the site capacity assessment for this site (CAP.043).

The position as set out in HEA.008a (page 46) is substantively unchanged. This site allocation comprises 3 proximate sites expected to be delivered together. The land parcels are all currently in use as residential, hotels, and retail, and a surface level car park. All are under the control of the same landowner. The landowner estimates delivery in the period 2030/31 - 2034/35. The landowner Nuffield College re-confirmed intention to develop when contacted (2026) about site deliverability.

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

The site capacity assessment form for the Nuffield Sites (CAP.048) identifies that part of Castle Mill Stream forms the western boundary to the Worcester Street Car Park. Acknowledging that this section of the stream currently has a 'hard bank', CAP.048 highlights that the Environment Agency suggested that there were opportunities for the removal of hard-bank protection.

The supporting text to the West End and Botley Road Area of Focus Policy sets out that redevelopment in the west end of the city centre provides an opportunity for well-designed high-quality buildings, public realm and streets that reflect and are well-related to the watercourses that run through it.

City Council Officers have liaised with Nuffield College throughout the production of the Local Plan 2045 in relation to the Policy SPCW7, in particular. Through these discussions City Council Officers have gained an understanding of some of the challenges around improving access to the Castle Mill Stream from the Worcester Street Car Park. As such, we have identified a potential modification to criterion b) of Policy SPCW7 to ensure that this part of the policy is clear and effective.

The following modification is therefore proposed:

b) Opportunities should be explored ~~taken~~ to improve access to Castle Mill Stream from the Worcester St Car Park site.

Q4 In allocating the site, how has the Council considered the visual impact of any development proposals, including on key views?

The City Council has considered the visual impact of the redevelopment of the Nuffield Sites, in drafting Policy SPCW7. This has included consideration of the visual impact of the redevelopment of this site on key views.

Heritage Impact Assessments (HER.008), were produced, the findings of which have been used to inform and refine a number of site allocation policies. These policies, including Policy SPCW7, were identified as being of concern by Historic England (HE) during the preparation of the Local Plan.

HER.008 provides details of the process undertaken. It also acknowledges that the submitted document represents an updated version to that first published at the Regulation 19 consultation stage. HE's submitted Regulation 19 representations (REP.03-081), included an objection to Policy SPCW7 – Nuffield Sites, and its associated Heritage Impact Assessment. The post-Reg.19 update to the Heritage Impact Assessments was produced primarily to address issues raised through HE's Regulation 19 representations.

The update focused on the South and East of Oxford Station Heritage Impact Assessment. This provided an opportunity to review and sense-check the analysis undertaken for Policy SPCW7 – Nuffield Sites.

The Heritage Impact Assessment for the Nuffield Sites begins with a comprehensive consideration of the heritage context of the sites and their surrounds. Page 36 of HER.008 sets out that the Nuffield sites sit with the Historic Core Area of the city and are therefore likely to be visible in a number of protected views. Local townscape views of importance in the area are also considered. A further discussion is set out in relation to how each of the Nuffield Sites form the setting to nearby heritage assets, highlighting that the Oxford Castle Scheduled Ancient Monument (i.e., the Castle Motte) sits close to, and is visible from, Worcester Street Car Park.

The Heritage Impact Assessment table on Page 38 of HER.008 provides analysis of each specific heritage asset within the South and East of Oxford Station Heritage Impact Assessment area, having regard to their significance (or listed grade). The table provides an overview of which elements of each heritage asset contribute to its significance. It also provides an overview of potential impacts from future development on the asset in question. For instance, in relation to the Oxford Castle Scheduled Ancient Monument, recognition of the significance of views from this heritage asset are considered. The table states:

The views from the motte and St George's Tower of Oxford Castle were designed to command all of their surroundings, for the purposes of surveillance and defensive action. Therefore, maintaining these panoramas is essential to conserving the significance of the Castle.

In addition to the heritage impact assessment for this site, a site capacity assessment was also produced. The site capacity assessments were produced to inform the drafting of the site policies. CAP.048 provides a detailed description of the Nuffield Sites and includes a detailed discussion of the historic environment, townscape character, and local context. CAP.048 shows that protected and local views were considered when drafting Policy SPCW7. To supplement the desk-based analysis that informed CAP.048. City Council Planning Officers also undertook a site visit. Photographs from the site visit include views across the Worcester Street Car Park to the Oxford Castle Scheduled Ancient Monument (i.e., the Castle Motte).

Both the HER.008, and CAP.048 have informed the drafting if this policy. Both documents consider the visual impact of redeveloping the Nuffield Sites, including on key views and these documents both produced, and used by City Council Planning Officers in allocating Policy SPCW7 – Nuffield Sites.

In addition to visual impacts, noise impacts are also relevant to this site, and the following modification is proposed to highlight the need for an acoustic design statement:

Addition of new criterion r) under 'Additional requirements' section as follows:

*r) Due to the potential impacts of noise from a number of sources (including the railway), development proposals should be informed by an acoustic design statement that addresses the potential for significant environmental noise (**Policy R8**).*

Q4 (cont.) Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned, including the approach to non-designated heritage assets?

The approach to the registered non-designated heritage assets on the Oxford Heritage Asset Register, is that they should be carefully considered as part of any development proposals at the site. Policy HD4 of the Local Plan 2045 sets out the expectations for applicants and decisionmakers when dealing with planning applications involving non-designated heritage assets.

Paragraph 215 of the NPPF states that "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*." As such criterion h of the policy requires applications to "demonstrate how the existing designated and non-designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach." It is considered that the submission of these details will enable the decision maker to come to a balanced judgement as required by paragraph 215 of the NPPF. The last part of that criterion provides applicants with the flexibility for alternative approach where it can be justified.

Historic England submitted formal representations (008 REP.3-081) at the Regulation 19 consultation stage. These representations expressed concern that Policy SPCW7 was unsound as drafted as there was a risk of harm to the character of the conservation area. Historic England considered that the policy did not represent a positive strategy for the historic environment (NPPF para. 203). 008 REP.3-081 also expressed concern regarding how other heritage assets would be incorporated into the development.

An agreed position was reached to satisfactorily overcome these representations from Historic England. This has been recorded in a signed Statement of Common Ground (COM.015). PDF Page 13 of COM.015 sets out the agreed position between the City Council and Historic England in relation to Policy SPCW7.

As such, the City Council would like to propose the following modifications to criteria f) and h) of Policy SPCW7, both of which are listed under the "Urban design and heritage" section:

*f) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed within consideration of their views (**Policy HD6**). In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill View Cones), further views, and relevant local views into, out from, and across the site should all be considered. Applications should be supported by a full assessment so that the full impacts can be understood and assessed.*

*h) Development proposals should show how the design of the scheme has been influenced by and has considered the city's heritage. Proposals should demonstrate how they would conserve or enhance the character of the conservation area (Policy HD3) and how the existing and designated and non-designated heritage assets, in particular the Royal Oxford Hotel and 18-26 Park End Street, would ~~can~~ be incorporated into plans to redevelop the site, or justify an alternative approach (**Policies HD3 and HD4**).*

It is worth noting that Historic England also expressed some broader concerns regarding the approach taken in Policy SPCW7, which included a recommendation that the site allocation be split into two. However, paragraph 3.6 of COM.015 sets out that the responses and proposed modifications set out in the Appendix to COM.015 would address the concerns raised by Historic England.

COM.015 highlights the fact that that there were no outstanding matters of disagreement when the Local Plan was submitted for examination.

As such, the proposed modifications outlined above, ensure that Policy SPCW7 is both justified and consistent with National Policy.

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?

The current use of the site is as an industrial estate with a mix of uses including office, industrial, wholesale and trade retail, academic institutional uses, vacant buildings and hardstanding including surface level car parking. An electricity substation and pylons are also present on the site.

The position as set out in HEA.008a (page 49) is substantively unchanged: community engagement has been undertaken to inform the design process for an application. A signed Statement of Common Ground (October 2026) has been agreed with the landowner. This forms part of the examination library (EXAM.018) and confirms the intention to develop. The landowner estimates delivery in the period 2035/36-39/40.

Whilst not directly on the site, criterion r of the policy references "supporting connectivity across the river with the future bridge link from Grandpont to Oxpens". This project, which will

provide a new crossing of the Thames and a link for residents, workers and visitors from the West of the city and the Osney Mead site into the heart of the city centre, is already underway.

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

The site lies within Flood Zone 3b, and when taking account of climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for this site (GRE.016) shows that more of the site will be in Flood Zone 3b in the future, with around 74% of the site expected to be inundated. This site is brownfield and paragraph 5.7 of Background Paper 007: Flood risk, SuDS and drainage (BGP.001h) acknowledges that whilst national policy and guidance states that development would not normally be appropriate because of the high risk of flooding and loss of storage space that would incur, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within Flood Zone 3b.

Paragraphs 5.8 and 5.9 of BGP.001h details that a pragmatic approach would continue to be undertaken (similar to current Oxford Local Plan 2036) which allows brownfield land in Flood Zone 3b to be redeveloped. However, there are several requirements in Policy G7: Flood Risk and Flood Risk Assessments that would need to be met for development to be acceptable and to ensure safety and improvements to flood risk management. An increase in flood risk vulnerability classification would not be permitted. The current use of the site is an industrial estate containing a mix of uses including office, industrial, wholesale and trade retail, academic institutional uses, vacant buildings and hardstanding including surface level car parking. The allocation is for a mixed-use development which would be suitable in principle in relation to flood risk, as the residential element (student accommodation) can be located outside of Flood Zone 3b.

Appendix A (see PDF pages 24-26) of the signed Statement of Common Ground with the Environment Agency (COM.008) sets out the concerns they still have with the scale of development proposed on the site and the lack of available space for compensation remaining, as 86% of the site falls within the design flood event. The Council agrees that the scale of development proposed is significant, but that the existing site is already very well developed and that this has been considered through the Osney Mead Site Capacity Assessment (CAP.049). This is a large and complex brownfield site involving several parties who have been working together to bring it forward for redevelopment. At present, the site is in employment use and suffers significantly from a lack of comprehensive flood risk mitigation across the whole site. Its redevelopment provides an opportunity to significantly improve the management of flood risk both on and off-site, and as reiterated in the City Council's approach to Flood Zone 3b (paragraphs 5.7-5.9 of BGP.001h).

As required by national policy (2024 NPPF, paragraph 172), a flood risk sequential test (GRE.017) was carried out to demonstrate that the use of sites in areas of higher flood risk was justified by there not being sufficient available sites at lower risk of flooding. Where sites in areas of higher flood risk are justified through the sequential test, it is also necessary to apply

the exceptions test. The exceptions test can only be fully passed in relation to a detailed proposal; however, the Level 2 SFRA assessment for Osney Mead (GRE.016) includes assessment as to whether it is likely the exceptions test can be passed and this concluded that it was likely that it could be passed.

Paragraphs 173-175 of the 2024 NPPF state that a sequential approach should also be considered on individual sites. Criterion d) of Policy SPCW8 has regard to this as it notes that a sequential approach should be taken to locating development on the site, with more vulnerable uses located away from the areas of highest flood risk. Policy SPCW8 also explicitly requires that in line with Policy G7 (Flood Risk and Flood Risk Assessments), a site-specific Flood Risk Assessment (FRA) is to be undertaken and that it should consider onsite routes and any infrastructure required to reach the access route.

The site is adjacent to land safeguarded for OFAS, so the following modification is proposed to reference this:

Addition of new bullet under 'Open space, nature, flood risk' section of policy, as follows:

*Land safeguarded for OFAS is adjacent to the site (**Policy I2**).*

In conclusion, and based on the above process that was undertaken, it is considered that the allocation is justified having regard to local and national 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?

The boundary for Policy SPCW9 covers two sites - the Main Eastern Station Entrance site and Becket Street Car Park. The main station site includes the station building and platforms, associated railway buildings, and the station forecourt with bus stops. The Becket Street Car Park, located south of Botley Road, is a large surface level car park operated by the railway franchisee. These two parcels of land are logically delineated by being in railway operational use.

The site allocation does not include the site of the Western Entrance to the station. The Western Entrance site is currently being delivered on-site under Prior Approval reference 21/02007/PA18. The City Council does not usually seek to allocate sites where development is being delivered. As such, the Western Entrance site has not been included within the site allocation policy for the station. Additionally, the works at the Western Entrance are being delivered through the prior approval process, and as such, the site's inclusion within Policy SPCW9 is not required to enable their delivery.

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

The City Council considers that the proposed mix of uses is both appropriate and justified for a site allocation proposed for within the city centre. The focus is on maintaining and enhancing the function of and access to the railway station. It is anticipated that a new station building and facilitate the likely increase in visitor numbers through the additional services that will run in the future and passenger growth associated with increased modal split. This will also provide opportunities to benefit the visitor and user experience of the station. Such investment in the railway station will require enabling development and Policy SPCW9 identifies a mix of uses in addition to a new station and associated public realm, which would be appropriate, including residential and/or student accommodation, employment (Use Class E), and complementary town centre uses including retail, cafes and evening economy uses, which activate ground floor frontages and help create a vibrant city quarter. These uses will provide benefits to users of the station and others in this part of the city centre. The Station is a prominent gateway to the city centre and the city as a whole and as such it is considered that this mix of uses is appropriate in such a location.

Network Rail's Regulation 19 representation (REP.3-088) provides support for the list of uses included in Policy SPCW9. Additionally, REP.3-088 request that Policy SPCW9 should also incorporate the need for education facilities. The signed Statement of Common Ground with Network Rail (COM.013) records that, following a meeting with Network Rail and the City Council on 30 March 2026, Network Rail clarified that there may be an opportunity to bring forward some Use Class E(f) uses (e.g., a day nursery) as complementary uses at the site. COM.013 records that agreement was reached that no change should be proposed to Policy SPCW9, as the policy already enables complementary uses to come forward at the site. This is set out in the final sentence of the third paragraph of the site, which states:

"Other complementary uses will be assessed on their merits."

COM.013 also sets out that agreement was reached between the two parties in relation to this issue.

Q3 Is the allocation justified and consistent with national planning policy insofar as heritage matters are concerned?

Policy SPCW9 identifies that there are a range of designated and non-designated heritage assets in and around this site. These are set out in the policy and are further supplemented by the proposed modification suggested below in response to Historic England's Regulation 19 representations. This approach is in line with the NPPF which requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment (paragraph 203).

Historic England (HE) submitted formal representations (008 REP.3-081) at the Regulation 19 consultation stage. These representations expressed concern that Policy SPCW9 was unsound as it was not justified by proportionate evidence. HE was concerned that without such work, the site allocation did not represent a positive strategy for the historic environment (para 203 NPPF December 2024). As such HE recommended that this site allocation should be informed by

heritage impact assessment. This was to ensure that Policy SPCW9 was informed by a better understanding of heritage significance and impacts on significance.

Following a review and update to the 'South and east of Oxford Station' section of the Heritage Impact Assessment (HER.008), and subsequent modifications to this policy, an agreed position was reached between HE and Oxford City Council. This has been recorded in a signed Statement of Common Ground (COM.015). PDF Page 14 of COM.015 sets out the agreed position reached between the parties in relation to Policy SPCW9.

As such, the City Council would like to propose the following modifications to the 'Notable heritage assets' section of the policy box:

The site is location within the Historic Core Area and within several view cones (in particular, Raleigh Park and Boar's Hill). The site ~~contains~~ is in close proximity to the Central (City and University Conservation Area to the east, as well as the Scheduled Ancient Monuments of Rewley Abbey (predominantly underground) and Swing Bridge at Sheepwash Channel. The site is within the setting of several Listed Buildings, including Church of St Thomas and the Martyr (Grade II) (directly opposite to the east), and its surrounding churchyard and boundary walls, Combe House (Grade II), and St Thomas Vicarage (Grade II). There are also Oxford Heritage Asset Register (OHAR) assets nearby including the Former Castle Hotel (23 Park End Street), the Sheepwash Channel, and the Westgate Hotel (Botley Road). The southern end of this plot extends into the precinct of Osney Abbey.

The City Council would like to propose the following modifications to the criteria within the 'Urban design and heritage' section of Policy SPCW9:

*i) Development proposals involving taller buildings that exceed the height stated in the High Buildings TAN should be designed with consideration of their impact on views (**Policy HD6**). In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work (to support the masterplan- led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full assessment should accompany proposals so that the full impacts can be understood and assessed.*

Insert the following text as a new additional criterion j). Re-letter subsequent policy criteria.

*j) Development proposals should be designed to avoid or mitigate their impacts on the significance and setting of the designated heritage assets nearby including the Central (City and University) Conservation Area, the various listed buildings, and scheduled monuments, as well as the non-designated heritage assets (**Policies HD3 and HD4**).*

It is worth noting that COM.015 also highlights no other outstanding matters of disagreement between the parties.

Q3 (cont.) What information is available to demonstrate that the proposed scale and mix of uses are developable?

The City Council and Network Rail have been engaging throughout formulation of the Oxford Local Plan 2045. A signed Statement of Common Ground has been produced with Network Rail (COM.013). Paragraphs 2.3-2.6 documents the formal and informal engagement that has taken place between the parties over the course of the plan-making process. As with all site allocations, Policy SPCW9 was drafted in line with the engagement process set out in the Developing Site Allocations Background Paper (BGP.002). A site capacity assessment (CAP.050) was also produced, which has informed the policy.

In relation to the mix of use proposed, Network Rail's Regulation 19 representation sets out that Network Rail supports the mix of uses proposed within Policy SPCW9. While signed Statement of Common Ground with Network Rail (COM.013) confirms the residential allocation for 52 dwellings as being deliverable in the plan-period.

As such, the City Council considers that the proposed scale and mix of uses at the site 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?

The Oxpens site contains a mix of uses that include the Oxford Ice Rink, a public surface level car park, a former filling station, open space, sheltered housing and businesses.

This site is largely owned by OXWED – a joint venture between Oxford City Council and Nuffield College. Two planning applications – an Outline application for the proposed development; and a detailed Enabling Works Application were both granted planning permission in July 2025.

The position as set out in HEA.008a (page 51) is substantively unchanged. The Outline Planning consent secured by the joint venture was for a mix of uses including 337 dwellings (both residential and student accommodation). The consent also made provision for a hotel (circa 250 bedrooms) and flexible Use Class E floorspace (including circa 60,000sqm assumed to be R&D). Within the flexible Use Class E floorspace, retail and other uses which activate ground floor frontages can also come forward. This consent also made provision for public open space, some of which is to be brought forward to enable the operation of complementary leisure and community uses.

Works associated with the Enabling Works Application commenced in February 2026 when preliminary tree maintenance was carried out. While in April 2026, demolition works were undertaken. The joint venture anticipates that the site will be delivered from 2025/26- 2034/35.

It is acknowledged that the land associated with the delivery of the remaining residential dwellings allocated within Policy SPCW10 is in a variety of different ownerships. The current estimated delivery of these dwellings (from OXWED) is anticipated for the latter part of the plan period.

The redevelopment of the Oxpens site represents a significant regeneration opportunity for the city, which is being driven forward by a joint venture between the City Council and Nuffield College. However, there are further key opportunities to unlock wider site supporting homes, place-making, and sustainable infrastructure. These measures would make the most efficient use of land, as well as enabling the redevelopment ambitions for the site to be fully achieved. This would unlock the full potential of the Oxpens site to be regenerated as a sustainable urban quarter. Some of these benefits may only be achieved through the redevelopment of the entire site, the potential benefits of which may, in future, justify the use of alternative delivery mechanisms.

OXWED – the majority landowner re-confirmed their intention to develop the site when contacted (2026) about site delivery.

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

The City Council's vision for Oxpens has long been as a new vibrant city centre quarter with a mix of uses. Policy SPCW10 provides the focus on residential development in line with the strategy of the Local Plan. However, as this is a city centre location it is also appropriate for a range of town centre uses as set out in the policy. It is considered that the phrasing used: "...and complementary town centre, leisure and community uses including retail, cafes and evening economy uses which activate ground floor frontages and help create a vibrant city quarter" is clear and directional, but not prescriptive.

In addition, the redline boundary for the Oxpens site includes the Oxford Ice Rink. The Oxford Ice Rink is a regionally important indoor sports facility and as an 'in-use facility' it benefits from other policies in the Oxford Local Plan 2045, and the NPPF (Dec 2024).

Sport England made an objection to this policy in their Regulation 19 consultation response (REP.3-085). They expressed concern that Policy SPCW10 was not sufficiently clear that, as a regionally important sports facility, the ice rink should be retained.

A signed Statement of Common Ground was produced with Sport England (COM.018) sets out the latest agreed position on this issue. It is worth noting that the City Council and Sport England have been engaging on various matters throughout the production of the Local Plan 2045. COM.018 sets out the process of formal and informal engagement that has taken place between the two parties at paragraphs 2.2-2.4. PDF Pages 19-20 provides details of Sport England's objection to Policy SPCW10. The two parties have agreed some additional policy wording which would overcome Sport England's objection to this policy.

As such, the City Council would like to propose the following modification to the Policy SPCW10:

Under the "additional requirements" heading in Policy SPCW10, include the following new additional criterion:

t) The ice rink is a regionally important facility and proposals which could impact upon this venue will need to accord with the requirements of Policy C3.

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?

The proposed allocation comprises two neighbouring properties, the St Thomas property is a former school building, now in use by various organisations including charities and social enterprises. The Osney Warehouse property is in use as an artist-led arts centre, incorporating studio, exhibition, education spaces/community uses.

The position as set out in HEA.008a (page 52) is substantively unchanged: the landowner estimates delivery of the site in the period 2030/31 - 2034/35. The landowner, Christchurch College re-confirmed intention to develop, when contacted in 2026, about site deliverability.

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

As set out above, the uses within this site are as follows:

- St Thomas site is a former school building now in use by various organisations including charities and social enterprises.
- Osney Warehouse site is in use as an artist-led arts centre with facilities including studio, exhibition, and education spaces/community uses.

As a diverse city, Oxford benefits from a wide range of facilities that are of importance to its local communities. As such, the Oxford Local Plan 2045 (CSD.001) seeks to guard against the unnecessary loss of these valued facilities in accordance with national policy (paragraph 98c, NPPF).

The introductory text to the "Community, institutional, social and cultural facilities and attractions" section in Chapter 7 of the Plan (CSD.001), sets out that a diverse range of facilities should be accessible that meet social, economic, health, leisure, cultural and religious needs of Oxford's diverse communities." A non-exhaustive list is then provided of facilities that are of importance to local communities, which includes community centres, meeting venues for the public or voluntary organisations and arts buildings. The three policies (Policies C3-C5) that sit within this section seek to address the diverse range of different types of facilities found in the city. This is in recognition that facilities that are of importance to local communities fall often within Use Class F(1), Use Class F(2), or *Sui Generis* uses (i.e., they are not within a use class). As such, this suite of policies seeks to create a framework that enables planning applications to be determined where planning permission is required in order to change from one lawful use to another.

The Osney Warehouse has operated as an arts building since 2004, run as an artist-led non-profit arts centre, offering exhibitions, workshops and courses and community spaces for hire. As such it provides a valued facility of importance to the local community. Given the

established nature of the community use, paragraph 98d of the NPPF seeks to ensure such facilities are retained for the benefit of the community. As such, this site allocation policy has been drafted to align with the retention/reprovision principles outlined above.

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

The site lies within Flood Zone 2, however, when taking account of climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for this site (GRE.016) shows that it will be in Flood Zone 3b in the future, with around 30% of the site expected to be inundated. This site is brownfield and paragraph 5.7 of Background Paper 007: Flood risk, SuDS and drainage (BGP.001h) acknowledges that whilst national policy and guidance states that development would not normally be appropriate because of the high risk of flooding and loss of storage space that would incur, historic development has happened within the flood plain and has led to a number of areas of brownfield land existing within Flood Zone 3b.

Paragraphs 5.8 and 5.9 of BGP.001h details that a pragmatic approach would continue to be undertaken (similar to current Oxford Local Plan 2036) which allows brownfield land in Flood Zone 3b to be redeveloped. However, there are several requirements in Policy G7: Flood Risk and Flood Risk Assessments that would need to be met for development to be acceptable and to ensure safety and improvements to flood risk management. An increase in flood risk vulnerability classification would not be permitted. The site contains a former school building now in use by various organisations including charities and social enterprises, whilst the warehouse is in use as a studio, exhibition and community uses. The allocation is for a mixed-used development which would be suitable in principle in relation to flood risk, as the residential element can be located outside of Flood Zone 3b.

As required by national policy (2024 NPPF, paragraph 172), a flood risk sequential test (GRE.017) was carried out to demonstrate that the use of sites in areas of higher flood risk was justified by there not being sufficient available sites at lower risk of flooding. Where sites in areas of higher flood risk are justified through the sequential test, it is also necessary to apply the exceptions test. The exceptions test can only be fully passed in relation to a detailed proposal; however, the Level 2 SFRA assessment for this site (GRE.016) includes assessment as to whether it is likely the exceptions test can be passed and this concluded that it was likely that it could be passed.

Paragraphs 173-175 of the 2024 NPPF state that a sequential approach should also be considered on individual sites. Criterion a) of Policy SPCW11 has regard to this as it notes that a sequential approach should be taken to locating development on the site, with more vulnerable uses located away from the highest flood risk. Policy SPCW11 also explicitly requires that in line with Policy G7 (Flood Risk and Flood Risk Assessments), a site-specific Flood Risk Assessment (FRA) is to be undertaken and that it should consider onsite routes and any infrastructure required to reach the access route.

In conclusion, and based on the above process that was undertaken, it is considered that the allocation is justified having regard to local and national policies concerning flood risk.

SPCW12 – West Wellington Square

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

Further progress has been made since the position set out in HEA.008a (page 53). The proposal now has a resolution to grant planning permission (25/03242/FUL) (decision October 2026), and a Section 106 agreement is in progress. The proposal results in no net change to residential provision. There is scope for further applications to come forward on the site to meet the policy requirements for residential development. The landowner estimates delivery in the period 2035/36 - 39/40.

A modification to the referencing of heritage assets was suggested in the Statement of Common Ground with Historic England, as follows:

Amendment to criterion d) as follows: *d) Development proposals should be designed with consideration for their impacts on the significance and setting of the conservation area and the nearby listed buildings ~~Proposals should demonstrate how the surrounding designated and non designated, heritage assets can be incorporated into plans to redevelop the site, or justify an alternative approach~~* ***(Policy HD3)***.