

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 2

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?

Work has been progressing at pace on preparing for the delivery of passenger services on the Cowley Branch Line (CBL). The funding for the CBL is made up of two elements: the cost of delivering the line itself (£155m) and the wider infrastructure and public realm required to ensure it can operate successfully (£12.5m). A significant proportion of the wider infrastructure and public realm costs are essential 'day-one' projects and as such represent up-front costs.

In October 2025 the government announced support for the project and £120m towards its delivery. This was conditional on £35m being made available from local funding sources. £23m of this has been secured in principle from the private sector through the Oxford Science Park and the Ellison Institute of Technology. £10m has been secured through City Council and County Council public sector funding.

On 14th July 2026, Oxfordshire County Council approved forward funding of £14.5m to address the remaining shortfall on the basis that this forward funding would be replaced by a proportion of future s106 and CIL funding. It is estimated that of that £14.5m, £12m will be repaid via s106 contributions and the remaining £2.5m would be sought through CIL.

On 19th August of this year a report went to the City Council Cabinet to agree that 30% of CIL collected within 1.5km of the CBL stations in Oxford would be ringfenced for a period of 10 years or until £2.5m has been repaid. This decision was required as the City Council remains the CIL authority, this means that these funds would facilitate the repayment of that portion of the County's forward funding over time.

In summary, with the additional £14.5m secured from the County Council, the CBL is fully funded, however, this contribution needs to be refunded through a combination of future s106 and CIL contributions. The policy seeks to ensure that these contributions are sought and fund the delivery of the CBL passenger services.

The 1,500m buffer zone has been informed by the local distribution of rail trips shown in the Network Rail Outline Business Case modelling for the Cowley Branch Line scheme. The planning data used to estimate the trip generations on the local area was sourced from National Trip End Model (NTEM) which was then updated with the information provided by the stakeholders to include local aspirations on the housing and employment growth to 2030. As set out in Policy CBLAOF, the area surrounding the Cowley Branch Line provides opportunities for significant housing and employment growth. This will lead to more demand for transport between the Cowley area and the rest of Oxford and the wider region.

Additionally, and in support of the findings of the transport model carried out for the Network Rail Outline Business Case, evidence from the National Travel Survey[1] suggests people are willing to walk up to 1,600m to a train station indicating that the 1,500m zone is a reasonable

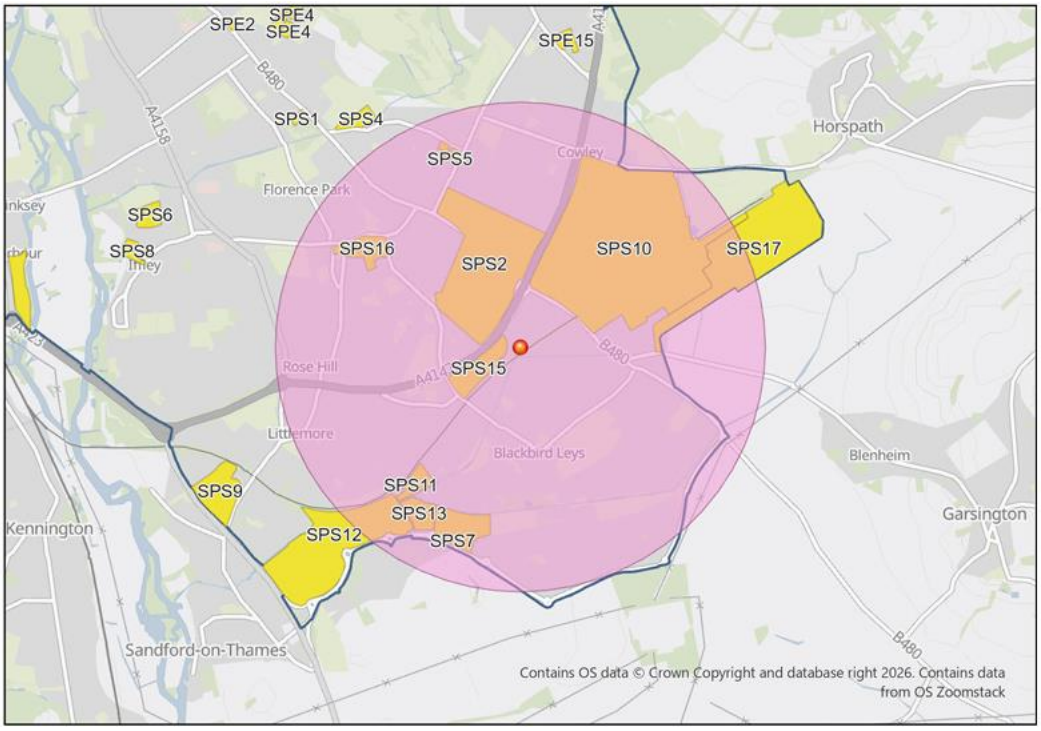
zone to propose which reflects the areas which are likely to directly benefit for improved transport links arising from the CBL stations.

The following modifications are proposed to Policy CBLAOF to rectify the omission of diagrams:

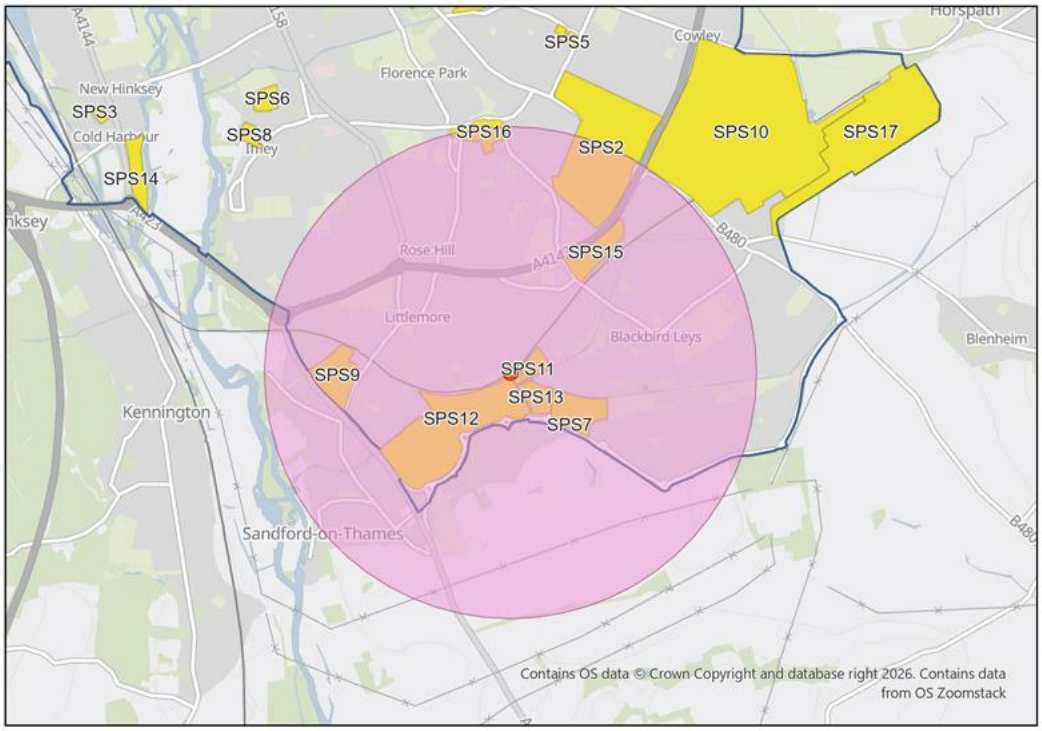
Addition of maps to show 1500m buffer zone where CBL contributions will be sought and subsequent amendment to criterion o) to update figure references as follows:

o) Financial contributions from trip-generating uses within a 1,500m buffer zone of the proposed CBL stations (where it falls within the city's boundaries) towards achieving public transport enhancements in this area, including, among other sustainable transport measures, the delivery of the CBL. Figures 8.1 and 8.2 show the extent of this buffer zone around both proposed railway stations and the site allocations that lie within it. Outside the 1,500m buffer area, financial contributions from new trip generating development would be sought on a case-by-case basis. These will be tested in accordance with Paragraph 58 of the NPPF.;

Insert Figure 8.1 - Site allocations within 1,500m buffer from Oxford Cowley Station, as below:



Insert Figure 8.2 - Site allocations within 1,500m from proposed Oxford Littlemore Station, as below:



Finally, it is proposed to update the Policies Map to reflect Figure 8.1 and Figure 8.2.

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?

Outside of the 1500m, it would be expected that contributions towards the CBL could only be sought for trip-generating development where there is specific justification relevant to that application (i.e. on a case-by-case basis) that would be relevant, necessary and reasonably related, in accordance with Policy S3 and the NPPF paragraph 58. It may be the case that a proposal comes forward on a site outside this zone, but which for specific reasons, for example relating to the type of use, may be appropriate and necessary for a contribution towards the CBL to be made. This is likely to be a rare occurrence outside the buffer area for the reasons set out at question 1 above, but it is important to flag within the policy that it may occur.

The infrastructure requirements are set out above, namely, the cost of delivering the line itself (£155m) and the wider infrastructure and public realm required to ensure it can operate successfully (£12.5m). This will be a transformation infrastructure project for the city.

Criteria b) of Policy CBLAOF signposts a relevant document outside of the Local Plan: Oxfordshire County Council's Local Walking and Cycling Infrastructure Plan (LIV.009). To ensure that the plan is deliverable over the plan period, a modification is proposed to future-proof the plan and to ensure its effectiveness and ensure consistency with National Policy.

Therefore, the following modifications are proposed to Policy CBLAOF:

Supporting active travel and infrastructure delivery

b) Walking, cycling and wheeling infrastructure improvements ~~in accordance with~~ should have regard to the requirements of the Oxford Local Cycling and Walking Infrastructure Plan (or future equivalent).

Additionally, an amendment to criterion h) of the policy is also proposed, for clarity, as follows:

Careful consideration given to the design and height of new buildings to ensure that their impact does not have a detrimental impact upon views from, or to, the historic core, or on surrounding low-rise residential areas. Development proposals should be developed in accordance with Policy ~~HD9~~ HD6 and the site-specific allocation, where applicable. Development proposals should respond positively to the surrounding area and should be informed by the High Buildings TAN and, more specifically, the CBL Densification Study (2025).

[1] National Travel Survey factsheet - Multi-stage trips

SPS1 – 474 Cowley Road

Q1 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 it will be in Flood Zone 3b in the future, with around 2% 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 was formerly in use as a commercial timber yard and is now vacant. The allocation is for residential development, which would be suitable in principle in relation to flood risk as it could 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 474 Cowley Road (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 SPS1 has regard to this as it notes that part of the site is located within Flood Zone 3 and Flood Zone 2, and 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 the higher fluvial zones. Policy SPS1 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 Appendix A of the signed Statement of Common Ground with the Environment Agency (COM.008), with particular reference to PDF pages 11-13, a more detailed review of access/ egress to the site is required by the Environment Agency as routes should be provided and avoid Flood Zone 3a. The Level 2 SFRA (GRE.016) does note that a site-specific FRA would need to investigate this further and likely utilise updated modelling results for Boundary Brook. To ensure effectiveness, the City Council has made a suggestion to address this with the following modification:

At the start of the final sentence of criterion d) of Policy SPS1, add:

Updated modelling of Boundary Brook will also be required to inform a ~~A~~ site-specific FRA, which should also consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site.

The Environment Agency has confirmed in COM.008 that this modification would be acceptable and would resolve their objection to this site allocation.

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.

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?

The primary use of the site is as an Innovation Campus/Business Park. This includes a mix of office space and modern R&D/laboratory space. The site also includes a few remaining plots which are as yet undeveloped. A variety of complementary uses (such as hotel,gym,cafe and car dealership) are also present at the site.

The Oxford Employment Land Needs Assessment (ECON.001) sets out a list of the recent planning applications at ARC Oxford which are all for R&D development:

PA Ref	Site Name	Net gain R&D (sqm)	Status (2026 update)

22/03067/FUL	Trinity House	17,669	Complete (2025/26)
24/0035/FUL	Plot 4200	5,055	Under construction
22/02880/RES	Plot 2000	23,373	Approved
24/01302/FUL	Plot 5000	8,005	Approved
25/01053/FUL	Plot 2700	2,610	Approved
25/02577/OUT	Plots 8200, 8400 and 9200	56,050	Planning Application
	Total:	**112,762**	

Total R&D floorspace approved by the Council at ARC Oxford in the last few years is 112,762sqm.

This planning application data demonstrates that the site is developable within the plan period. Some of the applications listed in the table above involve the redevelopment opportunities involving the modernisation and intensification of secondary office space; while others are bringing forward development at some of the remaining vacant plots.

A modification is proposed to ensure clarity about heritage assets in the area:

Addition of criterion under the 'Urban design & heritage' section, before current criterion g) (and letters for criteria that follow will need to be updated to account for new criterion added), as follows: *Proposals should be designed in a way that is sensitive to the nearby listed building, as well as the Temple Cowley Conservation Area which lies adjacent to the site, particularly regarding heights, massing, roofscape and impacts on local character and street scene* ***(Policy HD3)***.

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

The bridge referred to in policy criteria h) vi., is also known as the Cowley Pedestrian and Cycle Bridge and it is to be delivered by the City Council. This bridge forms part of a wider programme of works associated with the reopening of the CBL to passengers. This new bridge will provide access between the proposed new CBL station and the Arc Oxford site and so is considered key to this site allocation. More details on the programme and funding for the CBL are provided in the response to Matter 5 Issue 2.

This bridge is identified within transport infrastructure scheme T8 in the Infrastructure Delivery Plan (CSD.006). Scheme T8 refers to an assortment of public realm and connectivity infrastructure to be delivered in association with transport infrastructure scheme T7 (CSD.006). Scheme T7 is the package of rail-related infrastructure required for the successful re-opening of the Cowley Branch Line to passenger services, including the creation of two new railway stations. In October 2025, £120m of funding was announced to support the delivery of this project by the government.

Feasibility work and concept designs (RIBA Stage 2) for a new public bridge for walking, cycling and wheeling over the railway line have been produced, funded and led by Oxford City Council. Bridge proposals have been developed through a process of engagement with stakeholders

through the RIBA Stage 1 and 2 design process. Consultees include local councilors (Parish/City/County), Healthy Streets and Active Travel Groups, Network Rail and ARC Oxford.

It is anticipated that the Cowley Pedestrian and Cycle Bridge will be delivered through the mechanism of developer contributions for essential 'day-one' projects as set out in the response to Issue 2 – Cowley Branch Line Question 1.

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?

Planning application 23/00988/FUL was approved at Planning Committee on 23rd June 2026, followed by a Planning Review Committee resolution to approve on 9th September 2026, subject to finalisation of conditions and the terms of the recommended S106 Agreement.

The approval is for 31 dwellings with associated public open space, multi-use games area, children's play area, landscaping and access, and the removal and replacement of a footbridge over an adjoining stream.

The capacity assumption is now updated to 31 homes to reflect capacity tested through planning permission. The landowner estimates delivery in period 2030/31 -2034/35.

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?

The City Council has had a proactive approach, as set out in the SHLAA (HEA.004a) to identifying sites for assessment as potential development sites, as part of our efforts to address the city's housing need. On this site there are no formal designations that would exclude it from assessment as a potential development site, and no insurmountable constraints to development have been identified. It currently comprises part of a site allocation for the same proposed use in the extant Local Plan 2036 as Policy SP32: Bertie Place Recreation Ground and Land Behind Wytham Street. There has also been longstanding landowner interest in developing the site for much needed affordable housing.

Policy SPS3 explicitly requires the re-provision of current facilities in order to meet the needs of existing users and that of new/future residents. The playground and MUGA are identified and have site specific criteria attached in respect to their retention and their re-provision respectively. As with other site allocations, a bespoke site capacity assessment was carried out on this site that set out the current context, site constraints and opportunities. The assessment for this site (CAP.027) identifies the current conditions of the site, the existing facilities and the natural features, with particular emphasis on the features where there may be opportunities to enhance and integrate into development schemes as part of the open space requirement. From this assessment, it was considered that retaining the existing provision on this site as part of a development scheme would be feasible.

Proposals will also be assessed against other relevant policies in the plan which would safeguard the onsite provision and deliver natural features and/or spaces on the site as follows:

- Policy G1 has as one of its requirements for applications affecting supporting spaces the provision of evidence that consideration has been taken of the role of existing spaces that support socialization and informal recreation, and where relevant references to up-to-date GI studies with particular attention to local need.
- The policy includes descriptions of key onsite ecological features that are expected to be retained (protected species, wildlife corridors) and the plan includes an urban greening factor policy (policy G3) which includes minimum requirements for green cover for development sites of this scale. The approach taken by the plan with respect to provision of green infrastructure takes into account enhancements in quality of GI as much as the quantity.
- The policy has requirements for the management of surface water flooding and sustainable drainage (Policies G7, G8). The allocation policy allows for the mitigations required to be delivered as open space or landscaping.

Taking together the evidence of the site not having insurmountable constraints to development, the current status as an allocated site in the extant plan and the established landowner interest, we consider that it is appropriate and justified for the site to be included inclusion in the emerging plan as an allocation. The allocation is also considered to be consistent with para 104 of the NPPF 2024, in that there are requirements for retention and/or enhancement of recreation facilities and open spaces on the site, with sufficient scope to provide these onsite or in suitable locations nearby.

The following amendment is proposed to ensure the site's status as supporting green infrastructure is clearly stated:

Insert new criterion f) under "Open space, nature, flood risk" heading.
f) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.
Subsequent criteria to be re-numbered accordingly.

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

The site lies within Flood Zone 3b, however, the approach of the City Council, through the SHLAA is not to automatically reject all sites that contain Flood Zone 3b, but only greenfield sites that are either entirely or nearly all within Flood Zone 3b (HEA.004a). However, development directly within the area of Flood Zone 3b would not be permitted, in accordance with national and local policy (see paragraph 5.7 of Background paper 007: Flood risk, SuDS and drainage BGP.001h).

The area of Flood Zone 3b (and indeed any notable flood risk) is small (around 1%) and found alongside the northwestern boundary of the site only, with Flood Zone 3a encroaching slightly along the southwestern boundary. When accounting for climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for Bertie Place (GRE.016) shows the most at-risk areas remain

towards the northwest of the site at similar levels to the present day, although the amount of Flood Zone 2 has increased significantly with around 78% of the site inundated. This allocation is for residential development and in line with paragraphs 173-175 of the 2024 NPPF, a sequential approach can be undertaken on site to ensure that the dwellings are located either outside of or within the lowest risk fluvial zones. The allocation for residential-led development is therefore 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 Bertie Place (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.

Policy SPS3 also 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.

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?

The site is currently in use as a City Council depot which includes storage for refuse vehicles. The position as set out in HEA.008a (page 9) is substantively unchanged: development of the site is contingent upon the relocation of City Council depot, for which an alternative suitable site needs to be found. The timescales reflect the complexity of this. The landowner estimates delivery in the period from 2040 onwards.

A suggested modification is proposed to clarify the policy,

Addition of new 'Additional requirements' section, as follows:

l) The site is adjacent to a playing field used for sports including cricket and as such design proposals should give consideration to the need for appropriate ball stop fencing at the boundary of the site to mitigate risks of ball strikes so that those uses can continue to be supported there.

In addition, the following modification to reference sports uses on the adjacent Cowley Marsh Recreation Ground is proposed:

Amend criterion b) as follows:

*b) Public open space will be required onsite **(Policy G2)**. The location of the public open space should take into account opportunities to provide connections and enhancements to the adjoining Cowley Marsh Recreation Ground including supporting the existing sports uses accommodated there.*

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 58% 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 is currently in use by Oxford City Council as a depot including storage for refuse vehicles. The allocation is for residential development and open space which would be suitable in principle in relation to flood risk, as the residential element can be located outside of Flood Zone 3b.

Appendix A (see PDF pages 22-23) of the signed Statement of Common Ground with the Environment Agency (COM.008) sets out the concerns they still have with the amount of development proposed, and the limited space on site to provide suitable compensation for the lost flood storage areas within the design flood event. The City Council has undertaken a detailed analysis through the Cowley Marsh Depot Site Capacity Assessment (CAP.028) which justifies the minimum amount of development to be achieved.

The Council acknowledges in COM.008 (page 22) that the Level 2 SFRA (GRE.016) does state that the main access to the site does lie within the design flood event and that a site-specific FRA would need to investigate this further and likely utilise updated modelling results for Boundary Brook. To ensure effectiveness, the City Council has made a suggestion to address this with the following modification:

Amend criterion f) of Policy SPS4 as follows:

f) A sequential approach must be taken to locating development on the site. A site-specific Flood Risk Assessment (FRA) will be required which should be informed by updated modelling

of Boundary Brook. The FRA should also investigate the flood risk the presence of the nearby culvert presents and identify…."

The Environment Agency has confirmed in COM.008 that this modification would be a positive addition, however it would not overcome their objection to the scale of the development and lack of space for flood compensation. In respect of suitable flood storage areas, the land immediately adjacent to the northwest of the site, Cowley Marsh Recreation Ground, is a greenfield site owned and managed by the same landowner as Cowley Marsh Depot (Oxford City Council). There is therefore potential to be able to provide suitable compensation to address the lack of space on the site to mitigate flood risk.

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.

SPS5 – Crescent Hall

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

The site is in use as student accommodation. The position as set out in HEA.008a (page 10) is substantively unchanged. The delivery period depends on wider estate reorganisation by landowner. The landowner estimates delivery in period 2035/36 - 2039/40.

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?

The supporting text to Policy C8 (Motor Vehicle Parking Design Standards) of the Oxford Local Plan 2045 (CSD.001) states that, "parking is one of the key means the Local Plan has of helping to promote the shift towards sustainable travel, and to minimise the impacts of car travel." It also notes that low-car developments are generally highly feasible in Oxford due to its compact size, availability of facilities, excellent public transport, and the existence of Controlled Parking Zones (CPZs). This site would meet the criteria identified in Policy C8 for low car development as it is located within the Temple Cowley CPZ, and its location is very suited to successful low car living. Furthermore, this site also meets the other threshold requirements of Policy C8 (walking distance to frequent public transport services and local supermarket), therefore this policy will only allow permission to be granted for residential development that is low car in this location.

SPS6 – Former Iffley Mead Playing Field

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

Position as set out in HEA.008a (page 10) is substantively unchanged: a current planning application still under consideration, the landowner estimates delivery in period 2030/31 - 2034/35.

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?

The allocation is justified and consistent with national planning policy. The site was once part of St Augustine School which closed in 2003 when Oxford City's schools were reorganised. It was held in reserve by the landowner, Oxfordshire County Council as a playing field for the adjacent Iffley Mead school site, (now known as the Iffley Academy) but was not required and has for many years been a disused, fenced off grassed area. It has never been open to the public and is surplus to requirements.

The Former Iffley Mead Playing Fields site is allocated as Policy SP38 in the Local Plan 2036 and its allocation was tested through examination of that plan.

To address a Regulation 19 representation from Historic England, a modification could be made to criterion e) of Policy SPS6 as follows:

> *e) Proposals should ensure that the archaeological assets are appropriately investigated and responded to* ***(Policy HD5)****. Any ~~sizable~~ development will require pre-determination evaluation (geophysical survey and trenching).*

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

Yes, safe and suitable access can be achieved from Augustine Way. Access to the site is currently from Augustine Way and Policy SPS6 identifies in criterion f) that Augustine Way offers the greatest potential for vehicular access, but that this would be shared with access to the adjacent Iffley Academy school. Therefore proposals should ensure that access to the site can be achieved without being detrimental to the school. The Iffley Academy school has a dedicated vehicle drop off/turning area, visitor parking provision (5 spaces including two disabled bays) and a gated entrance to its car park. These are all separated from the gated entrance to the site which has existing footway provision on either side.

Policy SPS6 acknowledges in criterion g) that limited vehicle movements would be beneficial and as the site is located within a Controlled Parking Zone (CPZ) low car development would be supported. The policy also makes clear in criterion h) that opportunities to access the site for walkers, cyclists and wheelers from Cavill Road and through the adjacent recreation ground to the north should be explored.

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?

The Kassam Stadium is currently (until 2028, which is extended from 2026) leased to Oxford United Football Club and acts as their home ground. Oxford United Football Club applied for planning permission to develop a new stadium (with associated developments including a hotel and conferencing centre) on land in Cherwell District Council's area, south of Kidlington, east of Stratfield Brake and close to Oxford Parkway railway station. The site is commonly known as The Triangle. The application (24/00539/F) was approved by Cherwell District Council's planning committee on 14th August 2025. Planning permission was formally issued after the Section 106 agreement was completed in February 2026. Subsequently, Friends of Stratfield Brake launched a judicial review challenge against the decision. The grounds related to the impact on wildlife, Green Belt, ancient woodland status and planned road closures. The High Court refused permission for a judicial review in July 2026. There was a subsequent request, which was dismissed at a High Court permission hearing in September 2026, the judge ruling the grounds of the challenge were unarguable. The Friends of Stratfield Brake intend to take the matter to the Court of Appeal to challenge the judge's decision, but that has not yet happened. Oxford United Football Club remain confident they will be able to begin work.

The redevelopment of the Ozone Leisure Park can occur independently of the stadium, and permission has been granted for a mixed-use redevelopment of the site, including restoration of the Grade II* listed Minchery Farmhouse (25/01588/FUL). The overflow car park could theoretically come forward independently of the stadium provision moving off-site, although that would require alternative arrangements for access to be put in place (for example, more shuttlebuses from a wider range of locations). The overflow car park is used very little except on match days. However, it will be important that, whilst the stadium is still in use for Oxford United FC, the car park is not redeveloped unless arrangements are in place. Therefore, the following modification is proposed:

Amendment to first sentence of Policy SPS11 as follows: *Planning permission will be granted for residential-led development and public open space on the Overflow Car Park at Kassam Stadium site, if the car park is no longer needed to support the use of the Kassam Stadium*.

In their Regulation 19 representation (REP.3-085) Sport England raised concern that the policy made no requirement that the replacement stadium be implemented and available prior to development commencing. In the Statement of Common Ground with Sport England, the City Council suggested a modification to SPS7 that adds a requirement for the applicant to show consideration for how existing users of the stadium could be accommodated should there be a delay in a new venue coming forward:

The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected. Proposals should include details setting out how existing users of the stadium site could be accommodated elsewhere if alternative

facilities are not yet available. There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site (in accordance with Policy E1).

It is considered that this would align with the expectations of Firoka as the landowner. In their Regulation 19 representation (REP.3-129), they said that: 'The Kassam Stadium site is a well-established location in south Oxford, currently accommodating Oxford United FC and a range of leisure and commercial uses. Since our reg 18 representation, the relocation of the Oxford United Football Club Stadium has been approved by Cherwell District Council. This replacement of the current stadium use from the site will therefore release the stadium site for development as a whole.'

The modification would also be in alignment with the current policy expectation in Local Plan 2036 Policy SP14: Kassam Stadium Sites, that: 'The football stadium should remain (unless it has been replaced elsewhere in Oxford or in proximity to Oxford) although there may be opportunity to develop new residential development within the corners of the stadium.' This policy was drafted before there was any plans at all for a new stadium, and also long before the end of the lease period, but even with those two scenarios now being in place, it is still important that the policy gives a clear expectation that reprovision of the stadium function close to Oxford is still expected.

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?

The Plan does not require the sites to come forward as part of a single, comprehensive development. It is expected that the different parts of the stadium complex of sites will come forward at different times, especially given that permission is already granted for the Ozone Leisure Park, yet redevelopment of the Stadium itself is most likely at least two years away. However, there are opportunities that can best be realised through a comprehensive approach, and delivery of features such as green spaces, green infrastructure and even quantum of uses may best be considered across the sites, rather than for each site individually. To take advantage of that opportunity, a masterplan would be required to show how all of the policy requirements will be met if spread across the sites.

To ensure it is clear that development may happen in stages, a modification is proposed to add a sentence to end of first paragraph of Policy SPS7 as follows: ... *This site is linked to **SPS11** and **SPS13**, and a flexible approach will be taken to how the required uses are spread across the sites, but this must be led by a masterplan that shows how minimum housing numbers will be achieved overall. Full redevelopment across the sites is interdependent with the stadium replacement scheme, but allocated uses may be developed across the sites prior to the removal of the existing stadium where this forms part of the masterplan strategy.*

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

The planning permission on the Ozone Leisure Park gives a clear landowner intention and shows the site is developable. The landowner has confirmed their intention to bring forward the other two sites over the plan period (HEA.08a).

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?

It is sufficiently clear what uses are permitted across the sites, and the policies effectively set this out. Policy SPS11 is clear that development is expected to be residential-led and to deliver public open space. It is acknowledged that the site is linked to SPS7 and SPS13, so there may be some flexibility in how the uses are distributed across the sites. Policy SPS13 is clear that a mixed-use development is expected. The policy acknowledges that there is some existing lawful use class E, which allows a lot of flexibility in what may replace it (e.g. research and development, which would be compliant with Policy E1 which acknowledges this type of development within lawful use class E). The policy is also clear that replacement is expected of the community commercial leisure use currently on the site in accordance with Policy C5. Again, this policy acknowledges the link with Policy SPS7 and SPS11.

Policy SPS7 is clear that development is expected to be residential-led with public open space and sets a minimum number of new homes at 290. As a site that is largely not in employment use, housing should be prioritised on this site in accordance with the spatial strategy. However, the existing use of the site means this is complicated. Sports facilities on the scale of the stadium would not be expected when that is replaced elsewhere. However, the stadium has a function beyond being the home of Oxford United FC (which has a wide catchment). Locally it is important, offering a more local, community function. The stadium also has conferencing and office based uses, which would count as Use Class E, and therefore allow some replacement use within this Use Class. These must only be a secondary use, as they are currently. The explanation of the calculation of the minimum housing capacity set out in CAP.031 is clear that an assumption is made for commercial use as a replacement of the conferencing facility on the site. To ensure the policy is clear and effective the following modifications are proposed:

Amendment to first paragraph of Policy SPS13 as follows: *Planning permission will be granted for residential-led development and public open space on the Kassam Stadium site. The existing stadium provides a number of functions currently, and replacement of the local, community role of these facilities will be expected. There is also a precedent for employment-related uses, so these will be acceptable as a secondary use on the site (in accordance with **Policy E1**).*

Amendment to first two bullets of first paragraph of Policy SPS13, as follows:
Planning permission will be granted for mixed-use development within existing lawful Use Class E and with replacement community leisure/sui generis uses. Acceptable uses on the site include:
- *Research and development (in accordance with **Policy E1**)*
- *Other Use Class E employment uses (in accordance with **Policy E1**)*

Amendment to first sentence of Policy SPS11 as follows: *Planning permission will be granted for residential-led development and public open space on the Overflow Car Park at Kassam Stadium site, if the car park is no longer needed to support the use of the Kassam Stadium*.

And the following modifications are proposed to ensure clear and consistent reference to heritage assets:

SPS11 Amendment to criterion h) as follows: *h) There is great potential for higher and larger plot buildings in front of the railway embankment and in the centre of the site, building in height from the outer edges towards the centre and north of the site. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

SPS13 Additional wording to be added to the 'Notable Heritage Assets' line in the summary box above the policy as follows:
Contains Minchery Farmhouse Grade II listed building. Potential for prehistoric, Roman and medieval archaeology, including remains associated with Littlemore Priory*....

Amendment to criterion j) as follows:

j) ~~Archaeological potential will need to be explored as part of any proposed redevelopment (Policy HD5).~~ Development proposals must take into consideration the potential presence of Medieval and Roman archaeological remains and remains of Littlemore Priory. Proposals should ensure that the archaeological assets are appropriately investigated and responded to (Policy HD5).

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?

Policy SPS11 is clear and effective in relation to access arrangements. The site is slightly awkward in terms of access, but sufficient access is possible if managed in the way set out in the policy. It is clear in criterion l) that vehicular access is expected to be, as it is now, from the bridge over the Littlemore Brook by the Ozone Leisure Park and from Grenoble Road beyond. This vehicular access would in no way provide sufficient access alone for walking, cycling and wheeling. Currently there is informal walking and wheeling access to Falcon Close (with no formal or metalled path), allowing access to good bus routes and the policy is clear that this route should be formalised (criterion j). The policy is also clear the link towards Littlemore via Priory Road in the southwest corner of the site is important for walking, cycling and wheeling access. This route would provide a much more direct access from the Eastern Bypass, which is the route emergency vehicles (particularly ambulances) would be most likely to be using. Servicing of the site would also potentially be much more efficient from this location. It is unsuitable as a general vehicular access because of the narrow width and height of the tunnel under the railway. Whilst there would be potential advantages of using this route for emergency vehicles, the height and width of the tunnel means only specially adapted emergency service

vehicles or servicing vehicles would be able to use it, so for effectiveness the following modification is proposed:

k) Walking, cycling and wheeling access towards Littlemore via Priory Road, which will also be a vital link to the Cowley Branch Line station in the future, must be retained and enhanced in the southwestern corner of the site. ~~The potential for a restricted access for vehicles from this location for servicing and emergency vehicles only should be investigated.~~

SPS8 – Land at Meadow Lane

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

Policy SPS8 does not set a minimum housing number. It sets a number of design parameters that will clearly guide the scale of development on the site, but the policy as drafted does not require a minimum number of units. This is in contrast to the existing site allocation policy in the Oxford Local Plan 2036 (SP42), which sets a minimum number of 29 units. The minimum number in the Oxford Local Plan 2036 assumed a low-density typology of 30 dwellings per hectare, appropriate to the semi-rural character of the Iffley Conservation Area. 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- see Question 3 below.

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

The site has an existing allocation in the Oxford Local Plan 2036 (SP42). This allocates the site for residential development with a minimum number of homes of 29. Following this allocation a full planning application (22/03078/FUL, registered on 28th December 2022) was submitted for 32 homes (19 affordable rented tenures, 13 affordable ownership tenures), also including details of access arrangements, landscaping and public open space. This application has neither been determined nor withdrawn, so it remains a live planning application.

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?

A Source Pathway Receptor Analysis (SPRA) has been carried out to investigate potential hazards (sources) and pathways to SSSIs, and mitigations (GRE.006), as explained in paragraph 1.1. The Iffley Meadows SSSI is protected due to the nationally scarce plants of the species-rich floodplain meadow, as set out in Table 4 of GRE.006. The Iffley Meadows SSSI has been identified as being sensitive to changes in the flows and quality of water in the two arms of the River Thames, due to being on its flood plain. Therefore, within the identified impact zone an

assessment of groundwater and surface water impacts should be required and sustainable drainage systems with an acceptable management plan should be incorporated. These actions ensure any potential negative effects are mitigated.

Because of the site's proximity to the SSSI and Thames, this site is identified in the Source Pathway Receptor Analysis as having potential impacts on the SSSI. The site is on the opposite bank of the watercourse to the SSSI; however, it is not the case that a development can't have any impacts on river flow and flooding. It is still important that the potential impacts of development proposals are understood and mitigated.

Other than potential impacts on the flow of the river Cherwell, there no identified pathways to impact on the Iffley Meadows SSSI. Therefore, the introduction of SuDS and reduction in surface water runoff will ensure the SSSI is not negatively affected. There is no reason these requirements wouldn't be achievable on this site. Surface water runoff from a greenfield site can be reduced with natural drainage features and there are a wide variety of possible interventions such as rainwater harvesting, infiltration basins, rain gardens and swales.

In addition to the proximity of the SSSI, it is also important to consider the ecology of the site itself. The potential for ecological interest was first investigated as part of the development of the Oxford Local Plan 2036 (TVERC, 2017, Phase 1 Botanical Survey Target Notes for Additional Oxford City sites, GRE.008). The survey area is wider than the final site allocation area, and the area surveyed as target note 1- semi-improved neutral grassland is not allocated or proposed for allocation (The Memorial Field, which has a proposed designation as Supporting Green Infrastructure). The southern part of the site as allocated was identified as semi-improved neutral grassland with tall herb, with locally dominant hogweed and some areas of bramble, and English oak trees at the site edge. The northern part of the site as allocated was at that time used for horse grazing. This meant access could not be gained to the site and the survey was done by observation from the margins. The horse-grazing area was identified as improved grassland. The pasture was short-grassed and few species could be identified. It was noted that the hedge at the edge of the field included elder and hawthorn with nettle, bramble, cleavers and ivy.

The intention of the phase 1 botanical survey was to identify whether there may be botanical features and therefore habitats that were potential showstoppers to development. None were identified and the site was allocated. The survey was not of a level of detail that would support a planning application. Further, more detailed surveys would be necessary to support an application, carried out at the time of the application and in relation to the more detailed proposals. The Policy SP45 in the OLP2036 was very clear that further biodiversity survey would be required alongside an application: 'A biodiversity survey will be expected to assess the biodiversity value of the site and it should be demonstrated how harm will be avoided, mitigated or compensated.'

Further ecological surveys were carried out and submitted to support the application 22/03078/FUL. An extended Phase 1 habitat survey was undertaken in June 2021. The site was found to be dominated by semi-improved neutral grassland, which does not meet the criteria for S41 priority habitat of principal importance. However, given the diversity of the sward and in

particular its importance for certain protected and notable species it has importance at the local level.

The Phase 1 habitat survey recommended a number of further specialist surveys. The reptile surveys found a low number of reptiles (a single common lizard found in one of 14 reptile survey visits between 3rd September 2021 and 1st October 2021. Therefore, a full trapping and translocation exercise was not recommended. Amphibian surveys identified no significant amphibian presence and no great crested news. It did not recommend further amphibian surveys.

The invertebrate survey report found a high diversity of species and a number of rarities of species. A total of 636 species were recorded. Nineteen species of conservation interest were identified, ranging from rare, nationally scarce, nationally notable, and notable, with one RDB1 (red data book Category 1 (endangered)). This species is Acinia corniculata, a pitcure-winged fly, once considered very rare but much increased in recent decades. The report said that, to ensure continued presence of the species, at least some knapweed should remain on site and uncut through the winter. A number of other recommendations were made because of the level of invertebrate interest within the site. This ranged from keeping certain species of plant and features on site to continue to act as habitats (such as deadwood areas of bare ground, hedgerows and trees), with careful cutting regimes, very careful lighting to minimise impacts on invertebrates, provision of new ponds of varying depths and sizes, consideration of green roofs on buildings to compensate for any habitat loss and consideration of off-site off-setting to compensate for any loss.

The full Ecological Impact Assessment found that the habitat available for invertebrates would decrease under the proposals as a result of the loss of the grassland, rubble pile, a small number of trees and a small length of hedgerow. In the absence of mitigation, loss of terrestrial habitat for invertebrates will have a negative significant effect at the district level. A mitigation strategy for the range of features of ecological interest was put forward. Mitigations for invertebrates included habitat creation measures and habitat management techniques.

The developer has been investigating potential for translocation of invertebrates off-site, as remaining habitat in the proposed scheme, with enhancements, to ensure there is sufficient mitigation. A suitable offsetting scheme has not yet been identified. That does not mean that there is not potential for translocation. If no suitable mitigation is identified, a re-designed scheme may be investigated.

Given the uncertainties over the proposed scheme, which at 32 dwellings is close to the current minimum capacity in the Oxford Local Plan 2036, a rough appraisal of the capacity of a potential alternative layout was undertaken to inform the Local Plan 2045. This was informed by information from the City Council's ecologists about the most sensitive parts of the site, that have greatest potential for enhancement. The ecologists gave an indication of the area that would likely need to be kept for ecology enhancement on the site (specifically invertebrates, but that would also work for badgers), assuming no offsetting elsewhere. This would allow development in the strip of land to the southeast accessed from Church Way, and separately in

the northwest part of the site fronting Meadow Lane. It is important that a modification to include a minimum lower than that in the existing Oxford Local Plan 2036 is not deemed as pre-determining the planning application process. However, for effectiveness, the following modification is suggested:

Planning permission will be granted for residential development at Land at Meadow Lane. The minimum number of new homes to be delivered is 10. Other complementary uses will be considered on their merits.

In addition, for effectiveness, the following modification is also suggested:

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

h) The site is identified as supporting green infrastructure (Policy G1) so enhancement of remaining GI will be required to mitigate loss.

[Re-letter subsequent policy criteria.]

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?

The site lies within the Iffley Village Conservation Area. There are listed buildings in proximity, which are Townsend Close and associated wall on the corner of Meadow Lane and Church Way (Grade II listed), Tudor Cottage on Church Way (Grade II). The site is within the Rose Hill View Cone. There is local view sensitivity from Oriel Meadow, the river towpath, Iffley Academy, The Bridleway, Church Way and Meadow Lane. There is also potential for archaeological interest as the site is located within the historic core of a medieval village and there is potential for Iron Age and Roman Remains. These features are noted in the capacity assessment of the site (CAP.032).

It is reasonable to assume that sensitive design can retain key characteristics and that a scheme could bring benefits that outweigh any harms (the approach of the NPPF). Conservation area designations do not automatically prevent any new development, even on green spaces that are a part of the setting. The allocation policy is written to note important characteristics and mitigations. This is informed by the initial testing through the capacity assessment process undertaken for all site allocations, which indicated ways of responding appropriately to the site's sensitivities (CAP.032).

It is highly feasible that a sensitive design can retain key characteristics and bring benefits that outweigh any harms. The allocation policy notes important characteristics and indicates ways of responding appropriately to these in the design. It is not considered the case that a development could not come forward that responds appropriately to the heritage significance of the site. The policy gives guidance on some key considerations to ensure this, such as the

need for low density and spaces between buildings, allowing views to and from the wider countryside and integrating green features as appropriate to the semi-rural character of the Iffley Conservation Area. The allocation policy also notes the potential for archaeological assets in criterion i.

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

The site would not be expected to generate any notable amount of traffic, but it is important that there is safe and suitable access into and around the site. Potential accesses for all site allocations were discussed with the County Council as Highways Authority and they did not raise concerns with the principle of allocation of this site, and they have not made a representation about this Policy SPS8.

It is considered that the site can be accessed safely with minimal negative transport requirements. Meadow Lane is identified as an on-road quiet route in the LCWIP, but so are many other routes in Oxford that have significantly more development alongside than Meadow Lane, even if development takes place on this site.

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

The site lies within Flood Zone 3b, however, the approach of the City Council, through the SHLAA is not to automatically reject all sites that contain Flood Zone 3b, but only greenfield sites that are either entirely or nearly all within Flood Zone 3b (HEA.004a). However, development directly within the area of Flood Zone 3b would not be permitted, in accordance with national and local policy (see paragraph 5.7 of Background paper 007: Flood risk, SuDS and drainage BGP.001h).

The area of Flood Zone 3b (and indeed any notable flood risk) is small and found alongside the small watercourse/drainage ditch to the west, in the southwest corner of the site only. When accounting for climate change, the Level 2 Strategic Flood Risk Assessment (SFRA) for Land at Meadow Lane (GRE.016) shows the at-risk areas remain towards the west of the site, with around 36% of the site within fluvial flood zones.

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 Land at Meadow Lane (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 f) of Policy SPS8 has regard to this as it notes that part of this site is located within Flood Zone 3 and Flood Zone 2 and 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 SPS8 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.

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?

The Littlemore Mental Health Centre is currently in use as a mental health hospital, forensics and as the Oxford Health Foundation Trust's headquarters. There is also staff accommodation, but this is located outside of the site allocation red line area.

The position as set out in HEA.008a (page 14) is substantively unchanged. The delivery period and site capacity depends on wider estate reorganisation by the landowner and ongoing use of the site for hospital uses. In their Regulation 19 submission (008 REP.3, Representation ID.111) the Trust identified that they had undertaken initial planning feasibility work for the Littlemore Mental Health Centre based on the following objectives:

- Maintain and enhance the existing operational functions, but explore the potential for 'transformational growth' including additional operational facilities such as additional inpatient capacity and accommodation for expanding outpatient services
- Potentially provide facilities for other healthcare services i.e. primary care, community services, third sector etc.
- Enhance existing areas of green space / biodiversity and their contribution to therapeutic treatments
- Provide better car parking management and improved accessibility

The Oxford Health NHS Trust owns a number of sites in Oxford and will bring these forward according to its estate strategy. Across its estate it intends to modernise its healthcare facilities, consolidate its admin functions and also provide housing, as set out in the Statement of Common Ground (COM.016). It is important there is flexibility within the policy framework about how uses are delivered across the Trust's sites. Until detailed proposals are drawn up and tested, then the estates strategy will be subject to change. Whether the site remains solely in its current use or draws in further residential and admin use can't be certain at this time, although this site will remain principally in hospital use. The policy approach reflects this situation. The parameters of the policy are however still considered important. The policy shows how the generic policies of the plan apply to this site, and draws attention to important

considerations for Green Infrastructure, design and heritage and access. It also makes it clear that employer-linked housing could be acceptable on this site.

No minimum housing number is included in the policy, because it is considered more important that the Trust is able to develop its estate in the most effective way for delivering its primary healthcare functions, and it must not be prevented from flexibly responding to needs over the plan period by a minimum housing number in the policy. For the purposes of the capacity assessment, 60 units are nominally against the Trust's Slade House site although they may come forward as additional units at any of the sites in the city within the Trust's ownership, including Littlemore Mental Health Centre.

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?

Achieving the Urban Greening Factor targets set out in Policy G3 is a requirement of major development and criterion a) is principally about signposting this consideration. It doesn't create new requirements or change what is expected through Policy G3 but does seek to set out what the policy's requirements mean for this particular site so it is clear to applicants.

In drafting criterion a) officers were cognisant that the industrial nature of the site and also the operational needs of the MINI Plant Oxford may require more innovative thinking about how best to incorporate greening. In preparing the site's site capacity assessment, which helped inform the allocation (CAP.034), a high-level desktop assessment was undertaken to help understand opportunities/constraints on the site and how the UGF target might be attained (as with other allocations).

Much of the site is urbanised with limited green space, reflecting the operational nature of the site, although there is a fairly large area of former playing fields in the northeast of the site. The remainder of the site contains limited green space, other than a few areas of landscaping comprising mown grass and trees/hedges, including some strips at the northwest corner of the site where Horspath Road meets the Eastern Bypass. As a result, the site is likely to be below the Urban Greening Factor target for non-residential sites as set out in Policy G3, thus future proposals for redevelopment will be expected to incorporate additional greening features to help attain this score and meet that policy's requirements for the range of benefits that Policy G3 seeks to secure. This is why the requirement in criterion a) discusses the need for additional greening.

The assessment process captured in CAP.034 identified various potential opportunities, including reducing hard surfacing and incorporating green SUDs features, which could also address existing surface water flood, as well as the potential to utilise green corridors throughout the site and along the railway for active travel and biodiversity gain. Of course,

applicants will be free to set out their own approach to meeting the policy's requirements at time of any application.

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?

The requirement set out in criterion e) responds to analysis of the urban realm surrounding the site as is documented in the site's capacity assessment form (CAP.034).

As set out in Box C of the form (Historic environment, character and local context), it was noted that the public realm of the surrounding streets which form the boundaries of the site vary in quality and that new development could present opportunities to improve upon these boundaries, though this would be subject to the operational needs of the site. Additionally, where new buildings are brought forward near the site boundaries, these will be experienced from the surrounding streets and it is important this is considered as far as possible.

Furthermore, whilst the analysis informing the site allocation noted that generally the site is in a less sensitive area of the city in terms of protected views and setting, there is still potential for significant new development to have an impact on the wider skyline particularly due to its fairly peripheral nature in an area that forms part of the transition from the built up city to the surrounding countryside.

As such, it was considered justified to set out some broad expectations around considerations of height, scale and massing and to ask that proposals consider the way that the site is experienced from afar as well as closer on the boundaries. Similar to the general approach across the requirements elsewhere, the criterion does not rigidly set out how the design should be approached, but sets out as an example that variations in materials and how they are placed could help – though proposals can approach the requirement in other ways too.

However, on further reflection, the City Council would like to put forward the following modifications which we feel could potentially enhance the clarity of what is expected of applicants:

e) Whilst there are limited constraints on the site, considerations around heights, scale and massing should factor in how ~~the~~ any development~~s~~ will be viewed from afar and on the approach, ~~so as to reduce feelings of overbearing and dominating of~~ as well as seeking to create a positive relationship with the adjacent streetscape. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025). Variations in materials, including selection of materials and how they are placed, could help to add visual interest to frontages and reduce homogeneity particularly when experienced from outside the site.

SPS12 – Oxford Science Park

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

Residential development would be supported in accordance with the requirements set out in Policy E1 i.e. where the employment use can be maintained and the number of jobs in employment generating uses is retained, as well as criterion h)-m) of the policy.

For clarity, the following modification to policy SP12 is proposed, in line with the Statement of Common Ground with Historic England (COM.015):

Amendment to criterion j) as follows:

j) Development proposals must be designed to preserve and enhance the setting of the adjoining Grade II listed Minchery Farmhouse, particularly plots in the east of the site (Policy HD3).*

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?

Criterion g) states: "Proposals should enhance and increase the public realm and landscaping of the Science Park, including, where possible, the creation of new public open spaces. Any new open space provided should be designed to be accessible for all site users and visitors. Wider public access to on-site open space is encouraged."

The rationale for the inclusion of this paragraph to improve the public realm and landscaping and encourage the inclusion of new public open spaces, is that currently the large employment sites in the city demonstrate poor integration with the surrounding residential areas leading to fragmented pedestrian and cycle routes and limited social interaction between those working on the sites and those living around them. The city is compact and land uses are located in close proximity to each other, but the hard boundaries and lack of permeability and wider public use of the site undermines integration and cohesion. Considering that the Oxford Science Park is located in the south of the city adjacent to areas where there is significant deprivation such as Blackbird Leys and Littlemore it would also be beneficial to try to improve the openness of the site, not just from a placemaking perspective, but also to support the Council's work on inclusive employment and Policy E3 (Community Employment and Procurement Plans).

Wider public access onto the site is encouraged by the policy but not definitively required as we accept that there are instances where this may be difficult to achieve, for example containment level 3 laboratories require high levels of security. This said, the general principal of improved access is achievable in areas such as the public realm or cafes which are provided on the site. It is also worth noting that this kind of community access to public spaces is starting to be employed more frequently to great success, for example at Oxford Factory and Missing Bean Cowley both located on the ARC Oxford site allocation. The policy seeks to encourage and support this further.

In summary, Criterion g) is included in the interests of good placemaking, increased activation and permeability around and through the sites as well as fostering a greater sense of social inclusion.

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?

The City Council considered impacts on ecology in a few ways, including through the sustainability scoring of the individual site assessment (CSD.004b page 128) as well as through the Source Pathway Receptor Analysis (SPRA) (GRE.006).

The SPRA identified that the Redbridge Paddock allocation site sits within the potential impact risk zone for the Iffley Meadows SSSI. The site is in close proximity to the SSSI, being separated from the meadows by an offshoot of the Thames, Weir Mill Stream. Within this context, development at the site presents opportunities to improve ecological value but proposals also require careful consideration due to the ecological sensitivity of the location which means they could have an adverse effect on the SSSI.

Page 6 of the SPRA identifies that the Iffley Meadows SSSI is sensitive to changes in the flows and quality of water in the two arms of the river Thames due to being in its floodplain. The SPRA goes on to set out recommendations for what proposals on this allocated site should do to help address potential for adverse effects, including being accompanied by an assessment of surface and groundwater impacts and incorporating Sustainable Drainage Systems with an acceptable management plan. These recommendations have been incorporated into the policy wording through criterion a).

Whilst the approach to drainage will need to carefully consider existing contamination and be informed by the remediation strategy for the site, surface water runoff can be reduced with natural drainage features and a variety of possible interventions such as rainwater harvesting, infiltration basins, rain gardens and swales which can be tailored to the needs of the site. The policy also requires a buffer to the watercourse in line with Policy G2 which will be helpful in this regard. With due consideration at the design stage, it is considered reasonable to conclude that impacts on flows and quality of water entering the river and potentially impacting the SSSI can be appropriately mitigated.

In terms of existing ecology potential on the site, the proximity to the river which acts as a valuable wildlife corridor means that there could be presence of a variety of species as was identified in the site capacity assessment (see CAP.038). Indeed, a habitat survey of the site was carried out in 2018 (GRE.011) which identified that, while not subject to any special designations for its biodiversity value, the site is potentially home to a range of important species, including protected species. The requirements of Policy G2 outlined above will help with preserving this wildlife corridor function, requirements of G6 around assessing potential for ecology and responding in accordance with the mitigation hierarchy will also apply.

Additionally, the Oxfordshire Local Nature Recovery Strategy (LNRS) mapping has also identified part of the site as an area that could potentially become important to biodiversity. Criterion c) states that proposals should demonstrate engagement with the LNRS and that they have explored opportunities for delivering biodiversity improvements to the site.

As outlined in the Biodiversity Background Paper (BGP.001f), the LNRS is a tool to identify areas with potential for valuable ecological improvement, but its recommendations are flexible and not prescriptive, to ensure they can be applied with sensitivity to individual site contexts. The allocation policy therefore guides applicants so that they give due consideration to what is set out in terms of opportunities for the area within the LNRS but leaves flexibility to allow for wider considerations of developing the site.

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?

The site is predominately scrub and bramble. It was previously used as rough grazing land and is a former landfill site.

The position as set out in HEA.008a (page 16) is substantively unchanged. The City Council is the landowner and has proposed to develop the site for residential use with the City Council's wholly owned housing company OX Place as the development agent. The Site Capacity Assessment (CAP.038) sets a capacity of 200 dwellings, with consideration of density transitions across the site and the provision of 10% public open space as required by Policy G2.

There is likely to be land contamination in need of remediation from the former landfill use, which Local Plan policy supports proposals to address. The Site Capacity Assessment notes that the site has undergone monitoring over a long period to gain an understanding of these remediation needs. There are also considerations required including an assessment of risk to the Iffley Meadows SSSI and a site-specific FRA.

A planning application is anticipated in 2026/27 following recent public consultation. The delivery period is expected to be 2030/31–2034/35.

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

This site lies within Flood Zone 3a, however, appendix 2 (PDF page 15) of the Level 2 Strategic Flood Risk Assessment (SFRA) Report (GRE.016) shows that a very small proportion of the site lies within Flood Zone 2 and Flood Zone 3a, mainly along the northern and southern edges of the site. Given the overall size of the site and the negligible extent of Flood Zone 2 within the site boundary, it is considered feasible to locate any proposed development entirely outside areas

of flood risk, in line with the expectations set out in paragraphs 173-175 of the 2024 NPPF. Criterion g) of Policy SPS14 has regard to this approach as it requires a site-specific Flood Risk Assessment (FRA) to be submitted which demonstrates how a sequential approach has been taken to locating development across the site.

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.

Two modifications have been proposed. One is to correct an error in criterion g) as follows:

g) A flood risk assessment will be required as a very small part of the site is in Flood Zone 3ab, which must demonstrate…

The other modification to the referencing of safeguarding adjacent land for the Oxford Flood Alleviation Scheme (OFAS) to the policy was suggested in the Statement of Common Ground with the Environment Agency.

Add a new bullet at the end of the 'Open space, nature, flood risk' section of policy, as follows:

*h) Land safeguarded for the Oxford Flood Alleviation Scheme (OFAS) is adjacent to the site (**Policy I2**).*

Because of the above addition, all remaining criteria in the policy will need to be renumbered ‘i)’ to ‘q)’ respectively.

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?

The site currently consists of three grass playing pitches and associated facilities including a car park and small pavilion. Hardstanding off Ambassador Avenue at the northeast of the site is used by a motorcycle training company.

The position as set out in HEA.008a (page 18) is substantively unchanged. The City Council is the landowner, with confirmed intention to develop the site for residential use. The Council's Cabinet decision on 18 March 2026 agreed to seek progress with the site via direct delivery.

A planning application is anticipated in 2027, with OX Place expected to be the development agent. The Site Capacity Assessment (CAP. 039) sets a capacity for the site of 300 dwellings, which are expected to be delivered over years 4 to 7 of the plan period. The assessment considers that there is potential for land contamination on the site which would need to be investigated and remediated where necessary.

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?

Paragraph 104 of the NPPF protects existing open space and recreational land, including playing fields and formal play spaces, from development unless either criterion a, b or c is met. The existing provision at Sandy Lane is not considered surplus at the current time, as such criterion a) is not relevant. Criterion c relates to circumstances where alternative sports and recreation provision with benefits that outweigh the loss of the existing, which is also not reason to justify development of this site. The applicable criterion at the site is b) which requires that the loss resulting from proposed development would be replaced by equivalent or better provision in terms of quantity and quality at a suitable location.

The Policy is clear that, as the space is also identified as supporting green infrastructure, any losses will need to be mitigated in line with Policy G1, this includes the requirement for reprovision of any pitch capacity that is lost, either on or offsite, as reflected in criterion a) of the policy. The site policy also requires that the City Council's Active Communities Team be consulted with to approve the relocation of the facilities, as is set out in criterion c).

In relation to the ability to reprovide offsite, the existing allocation for the site in Policy SP11 of the Local Plan 2036 was drafted on the basis that an element of pitch provision would likely need to be retained onsite, meaning a lower minimum housing number was required of proposals unless this could be satisfactorily reprovided elsewhere. However, as set out in the Site Capacity Assessment (CAP. 039) the allocation for the Local Plan 2045 works on the basis that further work has now been undertaken by OxPlace to identify suitable sites in the local area to deliver the pitch reprovision, as was set out in the report to Cabinet on 18 March 2026. Because of this additional certainty about reprovision likely being able to be delivered, the policy assumes a higher minimum number that can be delivered, though still makes allowance for a lower minimum being accepted where onsite provision ultimately does need to be retained.

Separately, in addition to requirements around reprovision of open space, the allocation also references the broader Local Plan policy (specifically Policy G2) which requires public open space on the site at a minimum of 10% of the site area. The site policy suggests this could be distributed across the site to provide a greater variety of functions for residents and visitors, including recreational functions, however, leaves flexibility for the application to determine the most appropriate way of delivering this.

A modification is proposed, as set out in the Statement of Common Ground with Historic England, to reference the High Buildings Tan and the CBL Densification Study: Amendment to criterion i) as follows: *i) Whilst the site is in an area of the city with fewer constraints or less sensitivity in terms of views, development proposals will need to consider and mitigate impacts on the sensitive skyline and surrounding area, particularly when viewed in combination with existing and planned development on adjacent sites. This could be achieved in various ways, such as by avoiding built forms with excessively overbearing scale or massing and avoiding roofscapes that are excessively uniform. Heights should be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

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?

The site is in use as a mixed use site that includes retail, parking and residential use, as well as various other community and commercial uses such as a community college, dentist, bank and community space. The delivery position as set out in HEA.008a (page 18) is substantively unchanged. The landowner estimates delivery in periods 2030/31 - 2034/35 and 2035/36 - 2039/40. There is an expired planning permission for the site, and since that time the landowner has working on a more ambitious scheme across a wider area of the site. Given the previous permission and level of interest and work on expanding that, delivery on these timescales is highly feasible. Additionally, the City Council has recently facilitated productive meetings between the landowner, Redevco, and Homes England.

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?

The background evidence in HEA.008a is clear in setting out expected delivery periods for homes. However, it is not considered that it would be effective for the policy itself to set out when uses should or are expected to come forward. However, the policy could be clearer that development may be phased, rather than needing to come forward all at once, and therefore the following modification is proposed:

Amendment to criterion d) as follows:

d) A masterplan should be produced to help organise services, access, movement routes, landscape, public realm and heights across the site. It is important that any piecemeal development or any phasing of the delivery does not prejudice the overall aim of a comprehensive regeneration across the site.

There are a wide range of uses that may come forward and that are allowed for by the policy. Many of those uses would be policy compliant but are not explicitly required. The policy does set some parameters in terms of uses required, in particular for housing, where a minimum of 500 net gain of units, and for commercial Use Class E, as active frontages are required along principal routes. This is to ensure the site continues to play its vital role as a district hub.

The site also forms a key part of the District Centre of Cowley Centre. Under Policy C1 the District Centre becomes a focus for the accommodation of a broad range of facilities including shops, hospitality, community and leisure (so called town-centre uses). Under Policy C1 community facilities and a health centre would be considered to be appropriate uses within the Cowley Centre; however, this is also clearly stated within Policy SPS16.

Policy SPS16 does not require new community facilities to be provided; however Policy C3 requires that local community facilities are re-provided as part of a development. Policy SPS16 therefore, simply needs to be clear that these would be considered a suitable use should they come forward (in addition to any replacement required). The ensure it is clear that this could encompass a wide range of community uses, the following modification is proposed to the list of uses set out in the second paragraph of the policy:

… • *Community facilities and services;*

The policy does not require a new health centre. This would not be considered justified, as a developer cannot itself have any control over whether a new, active, health centre is provided. Providing accommodation for one without there being a practice in place to occupy it and give specifications also risks an empty unit, and will not alone be sufficient to ensure a health centre on that site.

The Infrastructure Development Plan in Appendix 1 sets out more information about the provision of primary health care in Oxford (CSD.006). The ICB does have an ambition to see improved health care facilities in this area, by merging existing provision, noting Templars Square as a desirable location for such facilities due to its accessibility and district centre designation. However, there is not a need identified in the Infrastructure Development Plan for a new health care facility at this site, and it would not be justified to require it. Temple Cowley NHS Health Centre is 10 minutes walk from the site and is accepting new patients. The Statement of Common Ground with NHS Thames Valley ICB, (COM.017) sets out that the ICB expects a 'turnkey' facility to be delivered for the ICB at nil cost. The City Council's response in the statement of common ground is that it does not seem reasonable to expect a developer to be able to undertake feasibility work to find the best way for primary health care facilities to be delivered in this area. The City Council's view is that feasibility work needs to be led by the body that oversees primary health care provision and understands how it fits with the wider context of the city and beyond and the complex mechanisms by which these facilities can be brought forward and run. It would not be proportionate for the developer of this site to have the burden of a feasibility study and delivery of a facility designed to replace two existing surgeries, simply because their site has been identified as a suitable location for this. The site can be adequately served by existing provision.

A modification is proposed, as set out in the Statement of Common Ground with Historic England, to reference the High Buildings Tan and the CBL Densification Study: Amendment to criterion g) as follows:

g) Because of the position of the site on a ridge in an elevated position relative to the city core, there is potential for development to alter views from and to the Historic Core Area (both in the foreground and background of views). Therefore, the townscape and visual impact of any development on views to, across and from the Historic Core Area must be understood, described and explained thoroughly, including with a Visual Impact Assessment, in compliance with Policy HD6. Heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).

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?

The site is currently being used for warehousing/storage, former industrial-related uses and office accommodation. A large part of the site is dedicated to surface-level vehicle storage/car parking.

The landowner's intention is to redevelop the site on a phased basis within the plan period for a broad range of employment uses (including B2/B8 uses). The landowner, Logicor, re-confirmed development intentions when contacted (2026).

A modification is proposed, as set out in the Statement of Common Ground with Historic England, to reference the High Buildings Tan and the CBL Densification Study: Addition of criterion under the 'Urban design & heritage' section, after existing criterion i) (and criteria after to be re-lettered), as follows: *i) Building heights should also be informed by design guidance in the High Buildings TAN and the CBL Densification Study (2025).*

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?

As was identified through the analysis that supported the drafting of the allocation, and captured through the Site Capacity form (CAP.041), the Unipart site is located in close proximity to a major development allocation which forms a part of South Oxfordshire's Local Plan (Northfield). Where there are currently open fields, this neighbouring allocation is expected to bring forward a large new primarily residential development of 1,800 homes which would significantly change the character of the immediate area.

Criterion k) therefore seeks to ensure that proposals coming forward on the site do so with consideration for this changing local context including the addition of a large number of new homes adjacent to the site. In particular, the intention was to guide applicants so as to avoid thinking about the design of the site in isolation, and to ensure their design process 'responded' by considering how design (e.g. scale, massing, and layout of new buildings) might be experienced beyond the site, but also to think about how people will move between the developments.

To improve effectiveness, we have identified some potential modifications which could assist with improving interpretation and giving further clarity over what applicants are expected to show in their application. The suggested changes are as per the below:

k) Design of new development should ~~respond~~ demonstrate how consideration has been given to the allocation of the land at Northfield on the southern edge of the site (within South Oxfordshire) and any proposals arising there in due course, in particular, by ensuring design and

layout is sensitive to the site allocation and facilitates linkages between it and the rest of the city ~~considering walk, cycle and wheel links to future transport infrastructure provision~~.