

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 3

Issue 3 – Marston Road and Old Road Area of Focus

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

As set out in the City Council's written response to Matter 3 at the Stage 1 Hearings, the City Council designed the Areas of Focus as a locally-specific policy tool to help deliver the spatial strategy. They are areas where significant changes are anticipated over the Plan period resulting from new development - either development within the city or in combination with development adjacent to the city boundaries. The intention of the specific AoF policies is to ensure the scale of growth is managed effectively with a more comprehensive approach across each area, by identifying key principles in terms of design, connectivity and infrastructure.

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

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

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

The criteria within Policy MRORAOF are considered to be both effective and consistent with national policy. However, criteria i) signposts a relevant document outside of the Local Plan: the 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.

The following modification is proposed to Policy MRORAOF:

Supporting active travel and sense of security when moving through the area

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

SPE1 Churchill Hospital

Q1 What is the justification for permitting 'other suitable uses' that must have "an operational and/or research link to the hospital"?

This site is in active use for healthcare as a major hospital and associated medical research, along with some staff accommodation and a day nursery. This is an important use and the constrained land supply in Oxford means there are no suitable available sites for reprovision in Oxford. As such, the strategy is to protect the site for ongoing hospital uses. So the site allocation SPE1 is permissive of further hospital related uses on the site and redevelopment to improve hospital facilities, as well as other uses with an operational and/or research link. Examples of such uses are set out in SPE1, including employer-linked affordable housing or employment uses which have a particular need to be located close to the hospital, such as pharmaceutical companies needing access to patients for research purposes.

The policy allows for sufficient flexibility to allow the Trust to crystalise their approach to the organisation of future operations and requirements across the estate. Subject to the OUH Trust's Estate Strategy and future operational needs on the site, SPE1 also allows for other complementary uses to be considered, provided that such uses do not compromise ongoing hospital operations on the site. For example, SPE1 and CAP.007 note that there is scope to consolidate surface car parking to make more efficient use of land, which could facilitate either expansion of the hospital uses or development of complementary uses.

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

SPE1 and CAP.007 note that the site is currently dominated by large areas of surface level car parking, with various parking zones across the site taking up significant land area. In order to make most efficient use of land, which is a key element of the overall strategy in LP2045 (Policy HD2), SPE1 requires that as part of future development proposals they should take the opportunity to rationalise the existing parking on the site to make more efficient use of the land. This could include measures such as consolidating car parking, or measures to reduce the amount of hard surfacing in favour of increased landscaping or other forms of GI. Such measures could also have additional benefits such as supporting enhanced ecology and biodiversity, and improving permeability through the site. CAP.007 notes that the Old Road Campus site opposite has successfully implemented multistorey car parking and a distribution hub as part of efforts to consolidate parking, albeit Old Road Campus is an employment/research site, and does not include the hospital uses. Policy C8: Motor Vehicle Parking Design Standards identifies that for non residential developments, the starting point is for no additional parking, except for blue badge and servicing only and that the Council will seek a reduction for highly accessible sites.

SPE2 – East Oxford Bowls Club

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

Paragraph 104 of the NPPF states that existing open space, sports and recreational buildings and land should not be built on unless it has been assessed to be surplus to requirements, it would be developed for alternative sports/recreational provision, or its loss would be replaced by equivalent or better provision in a suitable location.

In light of Oxford's constraints and significant unmet housing need, it was important to be thorough and take a 'no stone left unturned' approach to identifying potential sites for housing. Therefore, open space and sports and recreation facilities were included in the pool of potential sites to be assessed, so that it could be identified whether they were potentially surplus or their loss was able to be mitigated, in line with national policy. The site was taken through several stages of assessment which deemed it to be deliverable and in line with national policy and the 2045 Local Plan (see BGP.002 for more detail on this allocation process, and page 166 of CSD.004b for the site-specific assessment).

There is agreement from Sport England with the Council's judgment that this site meets the test of being surplus to requirements, set out on page 21 of the Statement of Common Ground (COM.018). The site has been out of use since the closure of the bowls club more than 20 years ago due to lack of interest. The pavilion within has burnt down and the site has been entirely closed off from public access for a significant period.

The site allocation policy states that proposals should support and enhance the adjacent Core Green Infrastructure and open space, as well as enhance the ecological features on-site. It is therefore expected that development of the site will contribute to qualitative improvement of open space, as well as opening up remaining green space on the site to improved public access.

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

Paragraph 219 of the NPPF is supportive of development in Conservation Areas (CAs) where it preserves the elements of the heritage setting that contribute positively to the CA's significance and its heritage assets. The allocation of the former East Oxford Bowls Club achieves this with regards to the Bartlemas Conservation Area, considering the characteristics of the site and components of Policy SPE2.

The site fronts onto Cowley Road, a main arterial road, and lies immediately southeast of the East Oxford District Centre. The neighbouring allotments to the northeast are designated Core GI and will retain a significant green buffer between the more built-up area and the historic, semi-rural setting of Bartlemas' listed buildings. (The Policies Map (CSD.007) is illustrative of this relationship.) This ensures that the character and significance of the CA and its heritage assets are preserved, in line with national policy.

Within Policy SPE2, design criteria further seek to ensure that development will contribute positively to the setting of the CA, in line with paragraphs 203 and 219 of the NPPF. The existing

trees and hedgerows which contribute to the setting are to be retained wherever possible and the policy stipulates that landscaping should be a fundamental consideration at the earliest stage of the design process to enhance this contribution. The policy also states that built development should be informed by the local context in its design, size and alignment, materials and construction details, in order to preserve the visual and physical connections between historical elements that contribute to the character of the CA. The Site Capacity Assessment (CAP.008) determines that the site is able to be developed to its expected capacity with respect to these heritage considerations, such as by echoing neighbouring block sizes.

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

The position as set out in HEA.008a (page 20) is substantively unchanged. There is confirmation of landowner intention to develop the land for residential use. No exceptional assessments, costs, or infrastructure requirements have been identified that could represent barriers to the development of the site. Delivery is estimated for the later years of the plan period, 2030/31–2034/35.

Capacity testing has indicated the site is expected to bring forward 10 dwellings within the plan period. The ecological and heritage requirements set out in Policy SPE2 were also taken into account when determining this figure. The policy requires development to consider the character and setting of the surrounding Bartlemas Conservation Area (CA), to retain existing trees where possible, and to enhance wildlife corridors and habitats on site through landscaping sympathetic to the setting of the CA. Assuming an imitation of the adjacent block size (approx. 35dph), thereby tying into the CA, as well as accounting for the developable area and protection of green infrastructure, 10 homes is considered an achievable capacity for the site. The Site Capacity Assessment (CAP.008) sets out how this capacity was determined.

It is therefore considered that the site is developable within the plan period and in line with the requirements in Policy SPE2.

SPE3 – Government Buildings and Harcourt House

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

Part 1 of the site (Government Buildings) is currently a car park with no buildings on site, only hardstanding, and is adjacent to Clive Booth Student Village on two sides, Marston Road and Headington Hill Park. Part 2 of the site (Harcourt House) is currently in use as a small business estate and cadet accommodation.

The position as set out in HEA.008a (page 21) is substantively unchanged. The landowner has confirmed the intention to develop the site for mixed use development including residential accommodation for staff and students, academic institutional and research/knowledge-based

commercial uses. Estimated delivery is in the period 2035/36–2039-40, with no identified barriers in terms of site assessment, viability, or infrastructure requirements.

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

While the site is expected to be delivered as a mix of uses, the majority is expected to be residential accommodation for staff and students. This is reflected in the allocated minimum capacity of 68 dwellings (or the equivalent for student rooms with relevant ratio applied). It is therefore expected that on this site the residential area will exceed 1.5ha, meaning that provision of public open space 10% of the residential area will be required, as per Policy G2.

The green and open character of the area, the site's location in the impact risk zone for the New Marston Meadows SSSI, and the identified potential for important habitats and biodiversity at the site are also key considerations identified in the site capacity assessment (CAP.009) which underscore the importance of incorporating open space at this site, in order to protect and enhance these features and their connectivity.

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

Context and justification for this policy is set out in the site capacity assessment (CAP.009). This includes analysis of its proximity to Headington Hill Park and the green setting and amenity this contributes to, which form an important context to be considered in the design of development at this site. There is also a wider context of the site's position within (Part 2) and adjacent to (Part 1) the Headington Hill Conservation Area, of which the park is an important feature.

Criterion o) requires amenity impacts on the adjacent park to be design considerations. It includes recommendations for implementing this through design to mitigate or buffer light pollution into the park and possible noise created close to the park boundary. This provides guidance for applicants to specifically consider the park as a special contributor to amenity in the area, while avoiding being overly prescriptive with how this is achieved in design terms.

The policy is supported by wider Local Plan Policy R8 which requires that amenity is protected and provides more extensive guidance about what specific factors this entails. It is also in line with national policy, such as Paragraph 198 of the NPPF, which states that tranquil areas valued for their recreational and amenity value should be protected from noise and light pollution.

Policy SPE3 is therefore considered to be justified and effective. However, for consistency and clarity, modifications are proposed to add two references in relation to heritage:

Additional policy cross ref needed to non-designated heritage assets policy under criterion g), as follows: *g) Proposals must be designed to be sensitive to their impacts on the significance*

*and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, taking opportunities to enhance these wherever possible (**Policy HD3 and HD4**).*

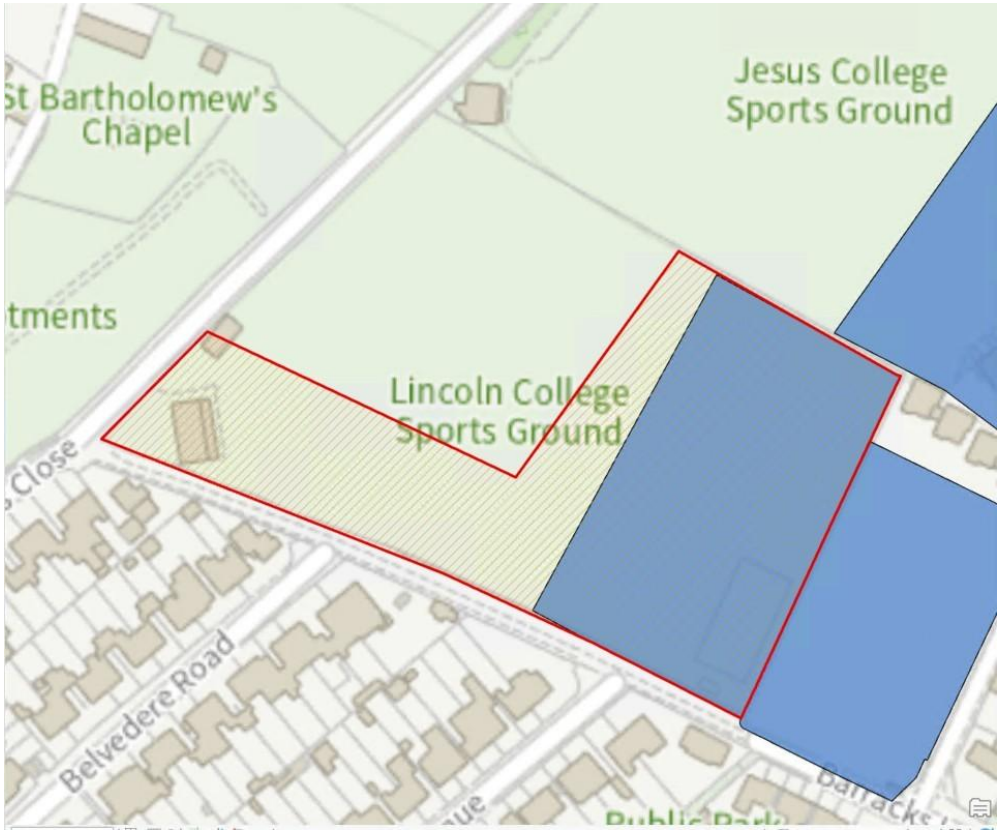
Amendment to criterion g) as follows: *g) Proposals must be designed to be sensitive to their impacts on the significance and setting of the nationally listed and locally listed heritage assets on site and adjacent to it, such as the Headington Hill and St Clements Conservation Areas, taking opportunities to enhance these wherever possible **(Policy HD3)**.*

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

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

Both the Jesus College Sports Area and the Lincoln College Sports Ground are already established site allocations within the Oxford Local Plan 2036 (Policies SP40 and SP43 respectively), although the site allocation for Jesus College in the Local Plan 2045 is larger and includes an additional parcel of land to the north of the Lincoln College Sports Ground. The boundaries for the sites have been agreed in collaboration with the landowners. A Statement of Common Ground has been agreed with Lincoln College which includes the site boundary location (COM.014) and includes a proposed main modification to the red line boundary which would include additional land to ensure adequate access could be provided.

The proposed modified red line for site SPE7 (Lincoln College Sports Ground) is shown below:



The site boundary for the southern parcel of land in Policy SPE4 (identified as Area B) reflects the existing playing field boundaries. The red line for the northern parcel of land (identified as Area A) was determined after undertaking a desk-based exercise which measured and calculated the remaining usable site area once the areas given to the existing sports uses (i.e. the cricket pitch, tennis court, pavilion building) were subtracted. This was to ensure that adequate reprovision of the existing sports uses could be provided in future redevelopment proposals. The appropriate dwellings per hectare density figure was then applied to the remaining usable site area to calculate the minimum housing number. The same exercise was undertaken with site allocation SPE7.

Once the usable site areas for each site were established, it was then important to consider how this could best be accommodated within the wider setting. The unallocated areas of the sports grounds adjacent to Bartlemas Close and therefore the Bartlemas Conservation Area are the most sensitive areas from a heritage perspective and following consultation with our heritage officers it was considered that it would be necessary to set back future development proposals from the Bartlemas Close where possible.

Additionally, from an urban design perspective, it was considered sensible to cluster the development parcels for both sites together as much as possible so that future development would be cohesive, even assuming that each parcel of land will be developed independently. Subsequently, the red line areas were agreed and are located towards the eastern edges of the sports grounds (except for the proposed modification to include access land, as set out in the paragraph above). The background to this approach can be found in the relevant site capacity assessments (CAP.010 -Jesus College Sports Area and CAP.013 - Lincoln College Sports Ground).

When the predecessor allocations were made in the current Local Plan 2036 it was anticipated that the two landowners would develop the sports pitches collaboratively and would be able to share facilities to make more efficient use of the wider land while retaining the recreational sports use of the sites. During our discussions with the landowners following the call for sites and the drafting of new site allocation policies it became evident that this collaborative approach was no longer likely to occur as previously envisioned due to differing priorities and timescales for the colleges. As such, site allocation Policies SPE4 and SPE7 have been formulated so that each site can be brought forward independently, while still allowing for a consolidation of sports uses to be provided if possible. This is set out in criterion c) of each of the policies.

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

Yes. Paragraph 104 requires that:

Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;
or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;
or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

In relation to Policies SPE4 and SPE7, paragraph 104 b) would apply. As set out above in Matter 5, Issue 3,Q1, the site capacity testing which has been undertaken indicates that the sites should be capable of re-providing the existing facilities through consolidation of uses and/or more efficient use of land. Criterion a) of Policies SPE4 and SPE7 state that the sites have been identified as supporting green infrastructure so enhancement of remaining GI will be required to mitigate loss and therefore Policy G1 would apply. Policy G1 was subject to discussion during the Stage 1 Local Plan Examination Hearings and there are a number of proposed main modifications to ensure that the policy is sound and compliant with the NPPF. On the basis that these modifications ensure consistently with the NPPF, Policies SPE4 and SPE7 also demonstrate consistency.

Within Policies SPE4 and SPE7 criterion c) is most relevant to the replacement sports provision. It states that only if sports provision can be shared and still meet the same capacity then a larger area of the site(s) can be developed. This is consistent with Policy G1 and the NPPF.

Notwithstanding this, for clarity a modification has been suggested following the Statement of Common Ground with Sport England (COM.018) to add additional text to criterion c) of both SPE4 and SPE7 (underlined red text indicates additional text):

> *c) There is potential to consolidate and share sports provision with the neighbouring Jesus College Sports Area (Policy SPE4). If sports provision can be shared and still provide the same capacity to meet playing pitch needs, then a larger area of the site(s) could be developed. Contributions could be made to improving a local facility such that its capacity increase replaces what is lost on the site(s). Reference will need to be made to the Playing Pitch Strategy.*

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

As set out above in Matter 5, Issue 3,Q1, the site capacity testing which has been undertaken indicates that the sites should be capable of re-providing the existing facilities through consolidation of uses and/or more efficient use of land. Additionally, there are opportunities for enhancements to sports sites elsewhere to help mitigate any impact on the sports provision

onsite as set out in policy i.e. proposals should ensure sufficient re-provision, ideally onsite but not necessarily onsite.

The evidence about the developability of the sites is set out in the Housing Land Supply Templates document (HEA.008a) and the Statement of Common Ground with Lincoln College (COM.014). Notably, neither Lincoln College nor Jesus College have raised any issues regarding their ability to comply with either the site allocation policies or the requirements of Policy G1.

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

Paragraph 219 of the NPPF is supportive of development in Conservation Areas (CAs) where it preserves the elements of the heritage setting that contribute positively to the CA's significance and its heritage assets. The allocation of the Lincoln College and Jesus College Sports Grounds achieves this with regards to the Bartlemas Conservation Area, considering the characteristics of the site and components of Policies SPE4 and SPE7.

As set out in Matter 5, Issue 3, Q1, through the site capacity assessments (CAP.010 -Jesus College Sports Area and CAP.013 - Lincoln College Sports Ground) consideration was given to the various constraints of the sites. The wider site boundary of the sports grounds, and land adjacent to Bartlemas Close is the most sensitive from a heritage perspective and following consultation with our heritage officers it was considered that it would be necessary to set back future development proposals from the Bartlemas Conservation Area and listed building Bartlemas Farm House (at the corner of Bartlemas Close and Barracks Lane) as far as possible while also ensuring that adequate sports reprovision could be accommodated onto each site. Specifically, the historic use of the Bartlemas Farm House listed building was as a site for lepers and therefore, the open space surrounding the building is an important feature of its historic setting as an isolated place, away from other buildings and communities. This ensures that the character and significance of the CA and its heritage assets are preserved, in line with national policy. As such, the need to retain a sense of openness and views informed the decision to locate the site allocation red lines away from the Conservation Area and listed building. Consideration was also given to the established tree belts which bound the wider sites and the allotments located in close proximity that all help to retain the green buffers between surrounding development and the sites and contribute towards the semi-rural setting of the Bartlemas listed buildings. The site allocations intentionally emphasise the importance of landscape design and enhancement of existing trees and hedgerows (see: criteria b) and d)) in acknowledgement of this contribution to the historic setting, as well as for their value as green infrastructure.

Within the policies, design criteria seek to ensure that development will contribute positively to the setting of the CA, in line with paragraphs 203 and 219 of the NPPF. The existing trees and hedgerows which contribute to the setting are to be retained wherever possible and the policy

stipulates that landscaping should be a fundamental consideration at the earliest stage of the design process to enhance this contribution. The policy also states that built development should be informed by the local context in its design, size and alignment, materials and construction details, in order to preserve the visual and physical connections between historical elements that contribute to the character of the CA. The Site Capacity Assessments determine that the sites are able to be developed to their expected capacity with respect to these heritage considerations, such as by echoing neighbouring block sizes.

A Statement of Common Ground has been agreed with Lincoln College (COM.014) which includes the following proposed main modification (additional wording in red and underlined):

> *The Crescent Road View Cone crosses the south of the site; proposals should be designed in a way that responds to this protected view (Policy HD6). This could be achieved by creating a graduation of height, lower on the southern edge and increasing in height towards the north, as well as appropriate massing and considering variations in roof forms. Development proposals located on the eastern corner of the site between Bartlemas Close and Barracks Lane should be designed in a way that integrates sensitively with the existing street scene, landscape character and neighbouring residential context, whilst respecting the character, appearance and significance of the Conservation Area. Gaps between buildings should be sufficient to retain the sense of openness and views of the green backdrop which enhance the setting of the Conservation Area (Policy HD3).*

The additional wording has been proposed to ensure that proposals are developed in a way which responses to and protects the setting of the listed building and Conservation Area. It is considered necessary because the proposed modification to the red line boundary would bring the developable area into closer proximity to the sensitive eastern edge of the sports ground.

SPE5 – John Radcliffe Hospital

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

The position as set out in HEA.008a (page 24) is substantively unchanged. The landowner, Oxford University Hospital NHS Foundation Trust estimates delivery across the periods 2035/36 - 2041/42. The delivery period depends on wider estate reorganisation and ongoing use of the site for hospital uses.

Q2 What is the justification for permitting 'other suitable uses' that must have "an operational and/or research link to the hospital"?

This site is in active use for healthcare as a major hospital and associated uses. This is an important use and the constrained land supply in Oxford means there are no suitable available sites for reprovision in Oxford. As such, the strategy is to protect the site for ongoing hospital uses. The site allocation SPE5 is permissive of further hospital related uses on the site and

redevelopment to improve hospital facilities, as well as other uses with an operational link. Examples of such uses are set out in SPE5b, including employment uses, patient hotel, employer-linked affordable housing or primary healthcare. Complementary uses which would also be suitable, but which should not dominate the new development on the site are general residential and student accommodation. More detail is provided at CAP.011 where the final bullet point of section C identifies it would be beneficial for the hospital if the site was developed for uses where the proximity of being adjacent to the hospital is important.

SPE6 – Land Surrounding St Clement's Church

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

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 New Marston Meadows SSSI is protected due to the specific grassland and fen species it hosts, as set out in Table 4 of GRE.006. The New Marston Meadows SSSI has been identified as being sensitive to changes in the flows and quality in the River Cherwell, due to being on its flood plain. 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 location immediately adjacent to the Cherwell this site is identified in the Source Pathway Receptor Analysis as having potential impacts on the SSSI. The site is downstream of the SSSI; however, it is not the case that a development can't have any upstream impacts on river flow. It is therefore important that the potential impacts of development proposals are understood and mitigated.

Other than potential impacts on the flow of the river Cherwell, there no identified pathways to impact on the New Marston 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 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. Indeed, a habitat survey of the site was carried out in 2018 (GRE.012) which identified that the main part of the site is semi-improved neutral grassland with tall herb (e.g. cow parsley, mugwort) and patches of nettle and bramble. Trees and shrubs at the field edges include sycamore and ash with hawthorn, blackthorn, field maple and English elm. The site was found to lack priority habitat and to be dominated by common, widespread habitats that are relatively easy to replace. However, it does provide a potential habitat for invertebrates, birds, reptiles and mammals (including bats and otter). 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.

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

The site is a greenfield site with existing known and potential wildlife interest. Furthermore, part of the site is identified in the Local Nature Recovery Strategy as an area of potential. Therefore, biodiversity and green infrastructure enhancements and high-quality features and networks will be required. Green amenity space around developments and alongside routes through the site will be required in order to respond to the GI and design sensitivities of the site. This is most likely to be in the form of gardens, but gardens may be too specific and directional when a looser type of amenity space could achieve the same effect. Therefore, for clarity and therefore effectiveness, the following modification is proposed:

~~*g) Gardens with rich planting along boundaries should allow more diverse routes through the site for wildlife, connecting the river with neighbouring sites.*~~

g) Rich planting through the site that allows diverse routes for wildlife, connecting the river with neighbouring sites, will be required. To achieve this, private or public amenity space that contains rich planting will be necessary alongside built development

The green leafy character of the area generally is an important aspect of the setting of heritage assets, and to highlight these heritage assets and the importance of green features in relation to them, the following modifications are proposed:

Amendment to merge criterion j) and n) as follows, and subsequent criteria re-lettered: *j) Development proposals should be designed with consideration of their impacts on the significance of the heritage assets* ~~*#listed*~~ *listed above (**Policy HD3**). Buildings should be arranged in a way that maintains the openness of the riverside setting, that does not compete with the Grade II* listed St. Clement's Church, and is sensitive to the adjacent Registered Park and Garden. Proposals should also maintain the hedge and treeline on the Marston Road and the avenue of trees south of the church that screen it and contribute strongly to the character of its setting.*

Amendment to current criterion l) as follows: *l) The narrow strip to the south of the church will need a bespoke design and there are a number of key considerations. Heights should drop towards the Cherwell, to be sympathetic to the relatively rural setting of the river and will also need to be designed with consideration for the view cone which passes through the site (**Policy HD6**). The green screening of the church should be retained. The impacts on the adjoining homes to the south will need to be considered carefully avoiding direct over-looking into windows.*

Amendment to 'Notable heritage assets' section in the summary box above the policy, as follows: *Site surrounds Grade II* listed St Clement's Church. Southern half of the site within South Park View Cone. Within St Clement's and Iffley Road Conservation Area and within*

setting of Headington Hill Conservation Area. The Grade I Registered Park and Garden Magdalen College lies adjacent to the site.

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

The reasoning for this criterion is set out in a bit more detail in CAP.012. The final bullet point of section D says: Parking should be kept in the public realm where possible and could be located close to the Marston Road, allowing the development of a masterplan more focused on walking and cycling within the site. The rural character of the site and it setting, in particular the position of it next to the listed church and the River Cherwell, means that it is sensitive to urbanising influences. It also means that high quality planting, retention and enhancement of some existing green elements and clear green routes through the site will all be important. Focusing car parking within the public realm allows more opportunity for cars to be concentrated in one area, rather than spread across the site and it also allows public realm space to be shared, reducing the amount of hard standing. This is not a requirement of the policy, but offers a direction towards a solution that would have a number of potential positive impacts, and would be part of the response to some of the sensitivities of the site.

SPE8 – Manzil Way Resource Centre

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

The position as set out in HEA.008a (page 27) is substantively unchanged. The delivery period and site capacity depends on wider estate reorganisation by the landowner and ongoing use of the site for healthcare services. The scale of residential development is not able to be determined at the current time due to the need for retained healthcare provision by the Health Trust. A Statement of Common Ground has been agreed with the landowner Oxford Health NHS Foundation Trust (COM.016).

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

The reasoning for this criterion is set out in more detail in the site's capacity assessment at CAP.014. Section D provides a description of the site's current context, including how it is laid out and connected to the wider area and also includes an officer assessed 'analysis and urban design implications' section. The capacity assessment helped influence the criterion of the movement and access section of Policy SPE8.

The Local Plan's employment strategy seeks to modernise and intensify existing employment sites and enable redevelopment opportunities within existing district centres. Policy C8: Motor

Vehicle Parking Design Standards identifies that for non residential developments, the starting point is for no additional parking, except for blue badge and servicing only and that the Council will seek a reduction for highly accessible sites. The Manzil Way Resource Centre is an existing employment site with vehicular parking provision and access for servicing. It is located within the Cowley District Centre a highly sustainable location, with access to frequent public transport services and good opportunity for travel by active modes. The landowner has identified the site as offering opportunity for redevelopment. Policy SPE8 is therefore considered to be effective.

SPE9 – Marston Paddock Extension

Q1 What is the site boundary based on and is it justified?

A larger site area in the control of the landowner was put forward at the start of the plan-making cycle for the Oxford Local Plan 2045, and the City Council understood the intention was to bring forward 20 homes on the area of grey belt. The indicative masterplan did show some development beyond what is considered to be previously developed land/ grey belt. The area to the east of the built-out Marston Paddock development and south of the A40 was shown on the indicative masterplan as for use for green infrastructure enhancement/ an attenuation pond only. None of what was proposed for that area of land would need an allocation policy. Given that the landowner seemed to have no intention of developing on this area, it was not included in the allocation. This seemed the most sensible approach, because the work that would need to be done to assess that area of the ownership for an allocation would be considerable and there are potential issues that would make it unsuitable. For example, access and the increased amount of traffic that would be generated, and the currently unknown biodiversity interest. Furthermore, the whole site would need to be removed from Green Belt, but a potential 20 dwelling development would not justify removal of such a large area of Green Belt.

Q2 Can all the requirements of Policy SPE9 be achieved within the red line boundary? Is the policy effective?

The approach the City Council took was to allocate only the area of previously developed land it considers to be grey belt, which is the area it understood to be proposed for development, and which is large enough to accommodate a minimum of 20 homes at less than 40dph, which is considerably less than the 50dph on the site to the north and which would seem appropriate to the site context. To allocate a larger site for development than seems necessary in order to achieve the development of the intended number of dwellings would not be justified, especially as that would involve removing more land from the Green Belt, and land which is not grey belt. The policy is effective as all uses for BNG enhancement required as a result of development or for SuDS and so on, could take place without this area being within the red line boundary of the allocation.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

Paragraph 147 of the 2024 NPPF states that local authorities should be able to demonstrate that it has fully examined all other options for meeting identified need for development, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. Paragraph 5.2 of Background paper 006: Green Belt (BGP.001g) notes that the plan's strategy has been to consider every potential site for development, fully utilising all potential opportunities on brownfield land. Background Paper 015 – Developing Local Plan 2045 Site Allocations (BGP.002) sets out how sites have all been considered, and the SHLAA Report (June 2026, HEA.004a) sets out the process in more detail. The capacity assessments are based on an assumption of high but appropriate densities, as set out in Background Paper 016 Efficient Use of Land (BGP.003). All opportunities to focus development on brownfield sites and maximise their capacity have been taken.

In addition to this, discussions have continued with neighbouring districts about production of the Plan. Extant plans in neighbouring districts include releases of Green Belt, with exceptional circumstances that justified their release being the need to accommodate Oxford's unmet need. Therefore, to not look at Green Belt in the development of the 2045 Local Plan, whilst asking for unmet housing need to be accommodated in neighbouring districts, which may then require Green Belt release, is not a good foundation for an unmet need discussion. Looking to Green Belt for housing development potential is a justified approach and the strategy demonstrates how the three criteria set out in paragraph 147 of the 2024 NPPF have been met before considering the exceptional circumstances to justify changes to the Green Belt.

Paragraph 146 of the NPPF identifies unmet housing need as one of the exceptional circumstances that exist that should trigger a review of Green Belt boundaries in accordance with the policies in the NPPF and propose alterations to meet these needs in full (unless doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan). As set out in the previous paragraph, the Council has demonstrated why exceptional circumstances exist to justify Green Belt release and that all opportunities to develop previously developed land have been maximised. The next stage, and in accordance with paragraph 148 of the NPPF, was to consider grey belt which is not previously developed, which includes this site, put forward on behalf of the landowner for residential development. The Marston Paddock Extension Site Capacity Assessment (CAP.015) considers the site in more detail and informs the allocation in the Local Plan (Policy SPE9 of CSD.001).

SPE10 – Nuffield Orthopaedic Centre

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

The site is in healthcare (with an active hospital) and medical research uses. It is a key employment site and existing allocation in the Local Plan 2036. The position as set out in

HEA.008a (page 29) is substantively unchanged. The landowner, Oxford University Hospital NHS Foundation Trust has identified that there is some scope for intensification of the site for hospital uses but the delivery period depends on wider estate reorganisation by the landowner and ongoing use of site for hospital uses.

SPE11 – Marston Road Campus

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

The site is currently in use as an academic campus by Oxford Brookes University. It is allocated in the current local plan as Policy SP50 for academic use, employer linked affordable housing, or residential development in the event of the University vacating the site. The position as set out in HEA.008a (page 30) is substantively unchanged. The landowner estimates delivery in period 2035/36 - 2039/40, and is dependent on a wider estate reorganisation programme by the landowner.

Q2 What is expected of development proposals under criterion c), which seeks to enhance and connect green infrastructure including between the Milham Ford Nature Park, inner quad and surrounding GI network? How will this be achieved and is the policy effective?

The approach of the site allocation policies is intended to give guidance on the application the wider policies of the plan in a site specific context, responding to an analysis of the setting and context of the site, but without being unduly prescriptive. It is informed by the bespoke site assessment (CAP.017) which sets out in detail the existing context and current situation of the site and its buildings with respect to natural features, character and movement/access.

The assessment includes a number of relevant observations including the following:

- Milham Ford Nature Park lies directly adjacent and forms the eastern boundary of the site, whilst housing/gardens abut directly west of the site and to the south separated from the site by a further line of trees/hedges.
- The site comprises of a large, self-contained complex of buildings that is almost completely built on except for the internal quad. The quad itself contains important areas of lowland meadow grassland and is described in Oxford landscape assessment report as a good example of how recreation and wildlife can be accommodated side by side. Both the Nature Park and the quad are designated as Local Wildlife Sites.
- Access into and through the site is also curtailed because of the layout and effects of piecemeal additions over the years.

In this context, criterion c) pertains to compliance with Policy G2, which requires design proposals to include green infrastructure features as a fundamental component of new development, comprising of new features and the enhancement of existing ones, prioritising

opportunities to improve linkages with the wider GI network including beyond the site boundaries. Policy G2 also sets out a number of benefits that proposals are expected to address, several of which may be relevant to informing the design.

There are various elements such as improved visual and physical connections, which could improve circulation and access. There may also be opportunities to integrate a more considered landscaping scheme that integrates more natural features within the grounds, and makes use of the spaces immediately adjoining the site. It is expected that applicants can demonstrate that these considerations have been made in design and access statements, or plans as appropriate.

For clarity and consistency, the following modification is proposed to SPE11:

Amendment to criterion g) as follows: *g) Design proposals should acknowledge the Milham Ford School building's status as a local landmark in a historic, social and physical sense. The OHAR designation report highlights the elements that are distinctive to the building and its significance which will be of relevance when addressing potential impacts on this non-designated heritage asset (**Policy HD4**).*

Q3 Is criterion h) justified and effective, which 'encourages' reuse of the original building fabric where this is 'feasible'?

Criterion (h) is included in this site allocation due to the specific circumstances. The site comprises a building on the Oxford Heritage Asset Register, the quad of which forms a Local Wildlife Site. In these circumstances it is important to consider the reuse of the original building fabric as part of the design process. There are also other policies of the Local Plan that would support this, for example Policy R2 which requires that applicants demonstrate that re-use of any existing buildings on a site has been explored and robustly demonstrated to be unfeasible before resorting to demolition. In this case both the OHAR listing (which makes Policy HD4 applicable) and the LWS designation (which make Policies G1 And G2 applicable) justify this approach being emphasised in the site allocation policy. This policy does not mandate the retention of existing buildings in all circumstances, and there is acknowledgement of situations where replacement is justified – albeit demonstrated on application.

https://www.oxford.gov.uk/downloads/file/4442/cap017---spe11-marston-road-campus-site-capacity-assessment

SPE12 – Rectory Centre

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

The Rectory Centre is largely developed, currently in healthcare use with existing road access and car parking spaces on the southern boundary. The site is located within the Cowley Road District Centre and adjacent to residential properties (CAP.018).

The policy is clear that, if the site is redeveloped for residential use rather than kept in the same use, then this would lead to the loss of community facilities, which should be re-provided elsewhere, in accordance with (Policy C3), which may be through consolidation onto other healthcare sites.

The landowner has confirmed the intention to redevelop the site for residential use subject to consolidation of existing uses onto alternative sites in the period 2035/36. There are no identified barriers in terms of site assessment, viability, or infrastructure requirements, and it is assumed all of the site is developable and the district centre indicative capacity of 100dph is used to derive the minimum housing requirement of 21 units.

SPE13 – Ruskin Campus

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

The position as set out in HEA.008a (page 32) is substantively unchanged. The site has planning permission, enabling works have been undertaken and conditions are being discharged. An application for certificate of lawfulness to confirm a material start was approved 1 October 2026. The landowner intends to bring forward the adjoining Ruskin Field, hence the delay to implementation of the permission.

SPE14 – Ruskin Field

Q1 What is the site boundary based on and is it justified?

The site boundary is completely different to the boundary of the site currently allocated in Oxford Local Plan 2036 as SP56: Ruskin Field. The whole field is in the ownership of the University of West London. Visually, there are various distinct parts of the field, but the clearest distinction is between the southern part (which is the current allocation) and the northern part (which is the proposed allocation). There is also a part to the west, which is not part of the current or proposed boundary. The southern part of the field has a greater amount of shrub and tree cover throughout and has some more wetland vegetation and characteristics around the pond. The northern part of the field is more open fields with hedgerows between them.

The field is sensitive in heritage terms. The field is within the Old Headington Conservation Area and contributes to its character as a semi-rural settlement. The Ruskin Campus contains listed buildings which lie immediately adjacent to the southern part of the field.

There is no existing public or vehicular access to the site. The south part of the field currently allocated in OLP2036 SP56 could be accessed only through the Ruskin Campus, which was a significant limitation on both the amount and type of development that would be suitable, and it would need to be clearly linked to the campus. At the time of the allocation, not other access options were possible. However, since this time an agreement with the City Council, approved at a Cabinet meeting, means that there is potential to create an access to the field from Foxwell Drive, in the northwestern part of the field. This access would be completely independent from the college.

Development of Barton Park to the north, on the opposite side of the A40, commenced during the development of the Oxford Local Plan 2036 and has been in development since. This development also influences which part of the field is most suitable for development as it has impacted on views and the character of the area to the north of the A40.

The landowner put forward the northern part of the field in the call for sites. They made it clear that this area was subject to pre-application submissions and was the area they wished to pursue, rather than the currently allocated site to the south. The current site allocation was not put forward in the call for sites. The northern part of the site has been further explored through the pre-app and to inform pre-app discussions, including by looking at the impacts of different heights and locations of buildings within wider views, and in discussions about access with the County Council. There were considered to be benefits to development on the northern part of the field as opposed to the southern part of the field, in terms of impacts on existing green infrastructure, heritage (impacts on the conservation area and listed buildings) and access. As the southern part was not put forward by the landowner, and the northern part was being actively pursued, the current allocation was not taken forward. The landowner has since, in their representations, said that they thought the current allocation would automatically be taken forward, and they did not agree with it not being proposed as an allocation in the Oxford Local Plan 2045. Given the need for protection and enhancement of green features, impacts on heritage and still limited potential access arrangements, allocation of the whole field is not considered feasible or desirable.

Q2 How has the scale of residential development been established and is Policy SPE14 justified and effective, having particular regard to the context of the site and the need to make an efficient use of land?

The capacity assessment in CAP.020 explains how the minimum housing number set out in Policy SPE14 was established. This does explain that a cautious approach has been taken to setting the minimum housing number and that further testing may show a greater capacity is possible. A cautious approach to setting the minimum number of homes has been taken because of the many sensitivities of the site. If the minimum housing number is set without regard for these sensitivities then if there is a conflict in considerations and requirements then that would create uncertainty and pressure about whether to respond appropriately to the site context or whether to meet the minimum housing number. A density of 25 dwellings per hectare was assumed, as this was considered most fitting of the greenfield location in a largely intact rural village type conservation area. There are also significant parts of the site that were not considered developable, and which were therefore discounted from the calculation. It was assumed that the north to south hedgerows and also all the boundary hedgerows would be retained in situ. It was also assumed that the southernmost parts of the site, towards the pond area, would be retained, potentially as public open space that could be a nature area.

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 Foxwell Drive. There is no access to the site currently, but there is potential for an access from Foxwell Drive that could suitably serve the development. There is a bus route along Foxwell Drive. Policy SPE14 identifies in criterion n) that Foxwell Drive is likely to provide the only option for vehicular access. The policy also makes clear in criterion o) that Stoke Place is not suitable for vehicular access, but access to it for walkers, cyclists and wheelers should be considered in order to ensure permeability.

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

The site lies entirely within the Old Headington Conservation Area. As a vestige of the rural landscape, the site makes an important contribution to the character, appearance and significance of the conservation area. There are listed buildings in proximity in the site, including those within the Ruskin Campus, which are the Walls of Walled Garden at Ruskin College (Grade II), and The Rookery (Grade II), and also Stoke House (Grade II), 8 Dunstan Road, (Grade II), The Manor Farmhouse and Garden Wall of Manor Farmhouse (both Grade II), Church of St Andrew (Grade II*). The 2011 Conservation Area Appraisal notes two significant view lines of relevance to the site, which is looking NNE from the SE corner of the site, and the other looking SW from the road adjacent to the NE corner of the site, towards Ruskin College. There is also potential for archaeological interest as evidence of Iron Age and Roman pottery production has been recorded from the Ruskin Campus site (CAP.020).

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.020).

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 development, retained hedgerows and treelines (as their structure provides an important visual link to the countryside beyond) and significant retained gaps to maintain key views and visual connection to remaining countryside, allowing views to and from the wider countryside and integrating green features as appropriate to the semi-rural character of the Old Headington Conservation Area.
The allocation policy also notes the potential for archaeological assets in criterion m.

Q5 What is the justification for criteria j) and h), which require development to be 'kept low' and retain important views, including specific reference to the view from Stoke Place across the site to Elsfield?

The analysis in CAP.020 explains that the field is important as a remaining vestige of the rural character of the conservation area, contributing to its setting and the understanding of its history. The structure or the hedgerows and treelines provides a visual link to the countryside beyond. These visual links are important to retain. The Conservation Area Appraisal notes two significant view lines of relevance to the site, one which is looking SW from the road adjacent to the NE corner of the site, towards Ruskin College, the other looking NNE from the SE corner of the site. That view from Stoke Place across Ruskin Fields to Elsfield is one of the most sensitive views across and out of the Conservation Area. The site is not within a view cone, but there is also potential for it to impact views from the Elsfield View Cone. Initial testing of views suggests that development closer to the A40 is least sensitive and heights should remain low to minimise negative impacts on the character of the conservation area. It also notes that important views across the site should be retained by careful siting of buildings.

SPE15 – Slade House

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

The site is currently in use for healthcare services (Child and Adolescent Mental Health Services (CaHMS) and Learning Difficulties). The position as set out in HEA.008a (page 34) is substantively unchanged. Whilst the landowner estimates delivery 2035/36 - 2039/40, the delivery period and site capacity depends on wider estate reorganisation and ongoing use of the site for healthcare.

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 administrative 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, draws in other uses, or changes use can't be certain at this time, and the policy approach needs to allow for all those possibilities. The parameters of the policy are however still considered important. Policy SPE15 shows how the general 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.

SPE16 – Thornhill Park (Phase 2)

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

The position as set out in HEA.008a (page 35) is substantively unchanged. There is extant planning permission for 402 dwellings (21/01695/FUL), but landowner intentions have since changed. The landowner confirmed (May 2026) they are now reconsidering smaller scale development, as reflected in the site allocation minimum figure. The housing trajectory therefore reflects the 170 dwellings in the site allocation to reflect the latest landowner intentions. No alternative planning application has been submitted yet, but the landowner estimates delivery of revised scheme in the period 2030/31 - 34/35.

For clarity and consistency the following modification is proposed (see SoCG with Sport England):

Addition of new criteria under 'Additional requirements', as follows: *n) The site is adjacent to a playing field used for 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.*

SPE17 – Union Street Car Park

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

The site is currently allocated in the current Local Plan 2036 as Policy SP59, as part of a larger land parcel that has been partially developed. The site is owned by the City Council, and it retains an interest in developing the site for residential use. The site benefits from being in a sustainable district centre location that is near to a range of amenities, and there are no insurmountable development constraints or infrastructure requirements (CAP.023).

The site is currently used as a car park and is wholly owned and managed by the City Council. There are no indications that the site is surplus to requirements, and it is expected that car parking will be retained at some level post-development. The extant allocation policy includes the same requirements with respect to retaining a level of car parking on site as considered appropriate by the City Council – with wording very similar to what is contained in criterion e) of the policy in the 2045 Plan.

The policy does not include a minimum quantum of parking provision as determining this lies outside the remit of planning officers. A separate Council department sets the level of provision based on the assessed need depending on the location, and requirements for the provision at each individual car parking site is assessed based on their own metrics. They also make the determination as to whether surplus capacity exists.

The site allocation is for low car residential development and as such it is not expected that there would be additional parking or traffic pressure arising from a policy compliant scheme. It is also considered that the policy affords sufficient flexibility with respect to design that would allow a range of options to integrate on site public parking at a functional level.

For clarity and consistency the following modification is proposed:

e) Public ~~C~~car parking spaces should be retained on the site. ~~to a level at which the City Council considers is reasonable to serve and safeguard the vitality of the district centre.~~ Supporting information justifying the proposed level of car parking spaces, and demonstrating that it is sufficient to safeguard the vitality of the district centre, should accompany any application. The retained car parking could be in a different form such as beneath ground level (undercroft), decking or surface level with buildings above.

To ensure the policy is effective, the following modifications are proposed to properly draw attention to potential archaeological interest:

Amendment to 'Notable heritage assets' section in summary box above the policy, as follows: *No designated buildings, spaces or structures on site. Site is within the Crescent Hall View Cone. Some potential for archaeological remains in the area related to former uses as a clay pit and brick yard and in relation to the Civil War Parliamentarian Line.*

Addition of new criterion under the 'Urban design & heritage' section, as follows, and re-number subsequent criteria: *XX) There is also the potential presence of archaeological assets on the site, including in relation to the Civil War Parliamentarian Line. Proposals should ensure that these are appropriately investigated and responded to **(Policy HD5)**.*

SPE18 – Warneford Hospital

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

The site has a resolution to grant hybrid planning permission subject to S.106 (decision April 2026). The S.106 is still being finalised and it is hoped will be completed by the end of the year.

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

The position as set out in HEA.008a (page 37) is substantively unchanged. The landowner estimates starting on site in 2029, and with an estimated completion in 2031 (for the new hospital and research building phases) and then for the College phase in the mid 2030s.

The landowners University of Oxford and Oxford Health NHS Foundation Trust re-confirmed intention to develop when contacted (2026) about site deliverability.