

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 4: Site Selection Methodology

Issue 1 - Site selection methodology

1. *The Developing Site Allocations Background Paper1 describes the assessment and filtering of potential development sites through different stages. The first stage sought to identify a*

large pool of potential sites. Over 500 are recorded in the Strategic Housing Land Availability Assessment ('SHLAA')

2. *A three-staged approach was then used to sift potential development sites and identify reasonable and deliverable options. Stage 1 'intrinsic constraints' considered whether there were any insurmountable physical or environmental constraints. Examples include greenfield sites within the floodplain (Flood Zone 3b). At this stage deliverability was also considered, with sites sifted out if they would fail to deliver at least 10 dwellings or if there was no robust evidence to show that a site could be developed during the plan period.*

Overview of site identification process

This overview is provided to help set the context for the Matter 4 questions below, as the process of identifying site allocations was not linear and was informed by a number of different streams of work. All of these streams of work are interlinked, and the identification and allocation of sites an iterative process. Background Paper 002: Developing Local Plan 2045 Site Allocations (BGP.002) gives the overview of how the site allocations put forward in the submission draft Oxford Local Plan 2045 (CDS.001) were arrived at.

The Strategic Housing Land Availability Assessment (SHLAA) (the latest iteration being the submission version, HEA.004a and HEA.004b) was the starting point in identifying sites. This starts with a list of over 450 sites. These were identified from a wide range of sources, including sites previously in the planning system, sites put forward by landowners and other stakeholders in call for sites and other engagement, and sites identified in a desktop map-based assessment. Green spaces meeting the size threshold were included, and so were employment sites.

Once the sites with development potential were identified, a first stage of filtering took place, in the SHLAA. This was informed by other pieces of work, most notably the identification of the Green Infrastructure Network and also the mapping of Flood Zones. As discussed above, site identification is an iterative process, and as this technical work progressed, the information relating to site assessments listed in the SHLAA was also updated. The first stage of filtering sifted out sites that were not considered to be developable. Some sites were considered to have insurmountable constraints on development, and these were outright rejected from further assessment. Other sites were then sifted out at stage 1 because they were not developable in the plan period, in particular if they were not going to be made available by the landowner for suitable uses during the plan period, or if there was serious conflict with the NPPF or the LP2045 strategy and no mitigation was possible. These sites were not outright rejected, so if they had been put forward by a developer or other stakeholder, in the consultation or in a call for sites, they were considered further, and consideration given to potential mitigations. Again, the shortlist was updated and reviewed as other workstreams completed.

Sites that passed the first stage of filtering were then considered in more detail. This included testing through the Sustainability Appraisal at stage 2. The sites were then tested in the Regulation 18 consultation. Following that consultation, further testing of constraints and

deliverability took place in stage 3, and this informed the site allocations in the Regulation 19 publication document (CSD.001).

There were multiple layers to the further testing in stage 3. The SHLAA continued to look at sites identified as developable over the Plan period for residential uses (of mixed-use including housing). This included sites which were not eventually allocated in the Local Plan, because the aim of the SHLAA was to identify housing capacity, and that includes capacity from sites which have already commenced, for example, and which are not therefore allocated. The ELNA (ECON.001) gave further consideration to employment sites. Because of the wide definition used for employment sites in Oxford (including hospitals and education), there are not any allocations that do not count as an employment site, housing site, or mixed-use with housing. Work on the ELNA and SHLAA both included engagement with landowners to check their continued intention to bring forward sites for suitable uses. This helped inform work on capacity and other detailed considerations for the site allocations. Work on the Sustainability Appraisal also informed the detailed drafting of site allocation policies for all uses, as it helped to identified necessary mitigations.

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

The first stage in developing the site allocations, is via the SHLAA (HEA.004a). Table A in the SHLAA (HEA.004b) provided the first sift of sites, so any sites which did not meet the achievable, available, suitable tests in the SHLAA were not taken forward for further assessment as site allocations or for consultation at Regulation 18. Sites that were rejected at this initial sift (Stage 1) of the process for identifying site allocations are listed in Appendix 1 of Background Paper 002a Sites Rejected before Regulation 18 consultation (BGP.002a).
Sites were not considered appropriate to take forward for further assessment for a site allocation if there was not robust evidence that they were deliverable during the plan period. This might be if they were not going to be made available by the landowner during the plan period, or if a landowner was not committed to bringing forward the site for development for suitable uses. If there was serious conflict with the NPPF or the LP2045 Strategy and no mitigation was possible, these sites were not considered further. Landowners or their representatives were engaged with at this point to check their latest aspirations for sites that were either existing Local Plan 2036 (LP2036) site allocations or that had been identified more recently as potential allocations (e.g. as part of the withdrawn Local Plan 2040 or call for sites). These meetings helped inform the shortlist of sites, proposed uses, and to check again if there were any further sites to add into the SHLAA before Regulation 18 publication.
Sites could not be assumed to be deliverable where:

- It was extremely unlikely to become available during the plan period e.g. due to existing uses
- The landowner has no intention to develop for suitable uses during the plan period

- Serious conflicts with NPPF or LP2045 with no mitigation possible, such as "Core" Green Infrastructure, or unresolvable highways constraints.

Appendix 1 of BGP.002 gives a headline summary of why each site was filtered out at stage 1, either because of intrinsic constraints or because they were not deliverable. Core GI is referenced amongst the reasons for Stage 1 rejection of 136 sites (Appendix 1 BGP.002a), but those sites that reference Core GI also had additional insurmountable reasons why they were discounted, such as no willing landowner, or Flood Zone 3b Greenfield. Further details about the assessment conclusions for all of the sites in Appendix 1 are also available in SHLAA Table A – All sites assessed (HEA.004b) which shows the other constraints and deliverability considerations as well.

For residential or mixed-use sites, those that did not have capacity to deliver a net gain of 10+ dwellings, because they were physically too small, or due to existing uses on the site, were also rejected from consideration for a site allocation. The site size threshold is explained in more detail in the SHLAA Methodology (HEA.004a).

In summary, the approach applied is consistent with the PPG guidance about Housing and Economic Land Availability Assessment (the more recent PPG on Introduction to Identifying, Assessing and Selecting Sites does not apply to LP2045 under the legacy system). In response to Oxford's significant housing need, every possible reasonable site was taken forward for consideration as a site allocation, because it was already known that there was likely to be a lack of capacity identified, so every reasonable site would be needed if there was sufficient robust evidence to demonstrate it was deliverable in the plan period.
The first stage of filtering led to the list of sites consulted on at Regulation 18. Before the list of sites for consultation at Regulation 18 was finalised. This work resulted in 62 potential sites being published in the Regulation 18 consultation document (Preferred Options) for comment. The list of sites being considered for site allocations at that stage is set out in Appendix 2 of BGP.002b (BGP.002b).

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

Appendix 1 of BGP.002a lists 384 sites that were sifted out prior to the Regulation 18 consultation. This includes sites with insurmountable environmental constraints (such as Flood Zone 3b Greenfield), sites which were under construction or had been very recently redeveloped, and sites which already had planning permission and did not need a site allocation. Note some of these sites already under construction or completed are counted in the calculation of capacity for the plan period 2025-2045 if there were completions since April 2025, but were simply filtered out of the shortlist of sites needing potential site allocations. This resulted in 62 sites being consulted on at Regulation 18, as potential site allocations (Appendix 2 BGP.002b).

3. *Sites passing to the second stage were then subject to a more in-depth analysis which involved the Sustainability Appraisal ('SA') framework and discussions with site owners and*

promoters. From this second stage, a shortlist of sites was created and presented as the Preferred Options in the Regulation 18 consultation.

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

All sites that passed the Stage 1 site filter process were considered to be broadly deliverable, that is, they do not have insurmountable barriers to delivery and they were expected to come forward for suitable uses during the Plan period.
These sites were then subject to more in-depth appraisal using the SA Framework including an individual site assessment against the SA objectives. This is explained further in BGP.002 (paragraphs 2.13 - 2.18). This more in-depth assessment of the site characteristics was stage 2 of the process. If an insurmountable constraint was identified at this stage that could not be mitigated, that would have led to the site being rejected at that stage. For example, if significant physical characteristics were identified or land contamination that could not be mitigated. However, at stage 2 no such constraints were identified that led to further rejection of sites, and all of these 62 sites were also published in the Regulation 18 document for consultation (BGP.002b); none were discounted until after the results from the Regulation 18 consultation and more evidence base was available to inform the assessments.

The SA process helps to identify potential sustainability impacts that could arise from taking forward an allocation. The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in a deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure. The SA scoring indicates where development on a potential site could positively support the 12 sustainability objectives, and also helps to identify where potential negative impacts/conflicts could occur that may need to be mitigated. These mitigations would come in the form of specific requirements to be set out within the allocation policy (e.g. policy wording that directs applicants to incorporate buffers alongside nearby watercourses where present; or to ensure potential impacts upon sensitive ecological sites nearby are appropriately avoided).

Each of the 62 site allocations proposed at Regulation 18 stage (Appendix 2 BGP.002b), was supported by an interim SA appraisal (PCD.001e with individual site references). As policies had not been drafted for the sites at that stage, the scoring completed was subject to further work (e.g. the sites were scored as 'depends upon implementation') against a number of criteria. For more information about the SA see the Site Assessment section of the SA (section 5.3, CSD.004a). The individual site assessments can be found in Appendix C of the SA (CSD.004b).

In direct answer to the question: no sites were discounted at Stage 2, for the reasons set out above, and the Council considers the approach, including the use of the SA framework, to have been adequate and robust, as it identified the sustainability effects of each site and the mitigation needed to address them in the allocation policies.

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

Q4 How did the Council consider Green Belt implications in establishing site allocations prior to the completion of this evidence? and Q5 Once the Green Belt and Grey Belt evidence was available, how did the Council go back and check previous assumptions and assessments, including sites that had been previously rejected at earlier stages? [response to Q4 and Q5 combined below]

The work to identify sites in the Green Belt and the work to identify site allocations generally were iterative and interlinked processes.

The capacity assessment carried out before the start of the process of developing the Oxford Local Plan 2045 included information from previous assessments of the Green Belt. For the previous Oxford Local Plan 2036 the decision was made not to pursue for development Green Belt sites where the assessment had suggested development would have a high or moderately high impact on the Green Belt. Therefore, this information was noted in the initial SHLAA assessment.

Ahead of starting the Oxford Local Plan 2045, the 2024 NPPF included amendments to Green Belt policy. This includes the clear expectation in paragraph 146 that, where there is unmet need (as there is in Oxford), authorities should seek to review Green Belt boundaries in accordance with the policies in the Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. This introduced the newly worded concept of 'fundamentally undermining the purposes' and the category of 'Grey Belt', as well as the expectation that sites in Green Belt are actively considered.

As a result of the new NPPF, LUC was commissioned to consider Green Belt parcels in terms of whether they met the definition of grey belt, and also whether development in the parcel could potentially fundamentally undermine the purposes of the Green Belt (Green Belt Assessment of Additional Sites, LUC, 2025 GRE.013a). Sites with insurmountable constraints were not assessed, as explained in response to Matter 3, Issue 3, Question 1).

As a result of these changes to the NPPF, as the capacity assessment in the SHLAA was undertaken to inform the emerging local plan, the consideration of Green Belt within that was also changed. References to the level of impact on the Green Belt as assessed in previous Green Belt assessments were removed from the SHLAA at that point. Green Belt impact was not a reason alone to prevent sites moving forward for development consideration (i.e. into Table B- sites with development potential). This is clear in the SHLAA published at Regulation 19 (Table A all sites assessed, HEA.003b) and the SHLAA published on submission (Table A

HEA.004b). Whether Green Belt is present is noted in the 'policy considerations' column, but in the 'justification' column that explains why sites were taken forward to Table B, Green Belt is not relevant as a reason a site is not developable (and it is not referenced in the suitability or availability columns).

The SHLAA was an iterative process, as was the consideration of Green Belt. Once the Green Belt Assessment was complete, it was clear on which of the assessed sites there was potential for fundamental impacts. However, at that point, all sites in the Green Belt were kept under consideration in the SHLAA, as whether there are fundamental impacts will depend on the specific nature of development within a parcel, including exactly which part of a parcel is proposed for development. Therefore, these sites were still, at that point, being considered further as part of the SHLAA process. As part of the consideration of the Green Belt, other policy approaches such as wildlife protections were considered and landowner interest was investigated (this process is explained further in response to Matter 3, Issue 3, Question 4). Only one potential site in Green Belt was identified as developable. This site is included in Table B of the Reg 19 and Submission SHLAA as site 114e. Appendix 2 of Background Paper 006: Green Belt (BGP.001g) sets out the reason no others were identified as developable; these reasons were not because of the assessed Green Belt function.

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

Appendix 3 of BGP.002c lists all of the sites in the Regulation 18 consultation for potential site allocations, and gives a commentary about the actions and conclusions for that site subsequent to Regulation 18 consultation. For example, whether the site was taken forward for more in-depth assessment as a site allocation; or whether adjustments were being made (such as to the red line, or proposed uses onsite); or whether the planning status had changed, such as a planning application being submitted or determined.

The majority of sites included in the Regulation 18 consultation were carried forward for further assessment and ultimately as site allocations in the Regulation 19 document. Appendix 3 (BGP.002c) summarises the results of the stage 3 assessment which took place after the Regulation 18 consultation. It explains the adjustments made to site allocations following Regulation 18, which included some combining of sites and changes to red line boundaries. Some of these were due to changes in landowner circumstances, and some were due to updated constraints evidence becoming available such as Strategic Flood Risk Assessment Level 2 and Green Infrastructure Assessment. Appendix 3 explains which of those from Regulation 18 were not ultimately taken forward as allocations and the reasons why. Only 7 sites consulted on at Regulation 18 were not included as site allocations at Regulation 19. It explains new sites added to the assessment at that stage. More details on those sites are set out at Appendix 3 (BGP.002c).
Three new sites were added to the assessment at this stage (Table on page 8 of BGP.002c): Marston Paddock was put forward by the landowner during the Regulation 18 consultation in Summer 2025; Hertford College site was submitted in the additional Call for Sites Autumn 2025 (when the timescales for the plan were adjusted to 2025-2045); and Red Barn Farm was an

existing site allocation in LP2036 and when the Northern Gateway/Oxford North red line was redrawn to be only the remaining phases of Oxford North, Red Barn Farm needed its own site allocation.

The result of the third stage of testing, is that 53 sites are included in the Regulation 19 document as site allocations, the majority of which are for residential development in response to the pressing housing need in Oxford. These are listed in BGP.002d, and the residential / mixed use site allocations are also listed in the SHLAA Table B (HEA.004b).
The site assessment process for assessing and selecting the site allocations in LP2045 has been thorough, proportionate and robust.

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

BGP.002 explains the stages of assessment and filtering for sites for site allocations in LP2045. It covers sites which were likely to need or benefit from having site allocations (whether for residential, mixed use, or for employment) in LP2045. Information can also be found in the Sustainability Appraisal (SA) for LP2045 which explains how SA has also informed this process to ensure that sustainability considerations are intrinsic to developing site allocations.
As explained in the introductory section to this Matter 4 statement, once the sites with development potential were identified, a first stage of filtering took place in the SHLAA. This was informed by other workstreams, most notably the identification of the Green Infrastructure Network and also the mapping of Flood Zones. As explained in the introduction above, site identification is an iterative process, and as this technical work progressed, the information relating to sites listed in the SHLAA was also updated. The first stage of filtering sifted out sites that were not considered to be developable. Some sites were considered to have insurmountable constraints on development, and these were outright rejected from further assessment. Other sites were then filtered at stage 1 because they were not developable in the plan period, in particular this was if they were not going to be made available by the landowner for suitable uses during the plan period, or if there was serious conflict with the NPPF or the LP2045 strategy and no mitigation was possible. These sites were not outright rejected, so if they had been put forward they would have been considered further, and consideration was given to potential mitigations. Again, the shortlist was updated and reviewed as other workstreams completed.

Sites that passed the first stage of filtering were then considered in more detail. There were multiple layers to this, and slightly different channels for assessing residential or employment sites. The SHLAA assesses the potential for residential development (HEA.004a and HEA.004b). Whilst the ELNA (ECON.001) reviewed employment land needs and assessed employment sites to help identify sites to be allocated for protection for employment development, as well as to understand which existing employment uses should be protected through employment-related policies, and which employment sites could help deliver some homes. So after the first stage of filtering the SHLAA continued to look at sites identified as developable over the Plan

period for housing (of mixed-use including housing). This included sites which were not eventually allocated in the Local Plan, because the aim of the SHLAA was to identify housing capacity, and that includes capacity from sites which have already commenced, for example, and which are not therefore allocated. The ELNA gave further consideration to employment sites. Work on the ELNA (ECON.001) and SHLAA both included engagement with landowners to check their continued intention to bring forward sites for suitable uses. This helped inform work on capacity and other detailed considerations for the site allocations. Work on the Sustainability Appraisal also informed the detailed drafting of site allocation policies for all uses, as it helped to identified necessary mitigations.

The process for assessing designation of Key Employment Sites (KES) is slightly different and is explained in the Key Employment Sites Method Background Paper (BGP.005). It was considered that KES do not necessarily need site allocations (Policy E1 would provide the required policy framework) but some employment sites may benefit from a specific site allocation, such as those likely to experience a significant scale of development in the plan period, or with particularly complex delivery challenges or constraints.

However fundamentally the assessment process for different types of site allocations was the same 3-stage process that is described in BGP.002: stage 1 – intrinsic or fundamental constraints; stage 2 – test against SA objectives; Stage 3 – further constraints testing and deliverability. Landowner engagement was undertaken at various points for all types of site allocations, as well as engagement with statutory consultees about constraints.

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

Site allocations from LP2036 were all reviewed as part of the evidence for LP2045, to assess whether they needed a new allocation in LP2045:

- Sites that have already been built out in full, did not need a new site allocation in LP2045;
- Sites under construction – a judgement had to be made. Medium sized sites generally did not need a new site allocation, if they were already commenced. But for larger phased sites such as Oxford North, a new site allocation could be of benefit in ensuring the delivery of remaining phases;
- Sites with planning permission, not yet commenced – similar to sites under construction, a judgement was made depending on the scale and complexity of the site, and the evidence about site delivery. For sites with greater uncertainty about whether the permission would be implemented within the plan period, a new site allocation could be of benefit in ensuring the delivery of the site;
- Sites not yet in the planning process or with a planning application pending determination – engagement with the landowners helped to understand any obstacles to delivery or changes in landowner intention or circumstances since the LP2036 allocation was tested. The principle of development of the site is established but constraints may have updated, such as flood risk mapping.

None of the allocations made in the 2036 Local Plan have been either 'saved' nor have any been carried forward into the 2045 Local Plan without a wholly new assessment process to decide if they were necessary or sound.

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

Work on the Infrastructure Delivery Plan (CSD.006) was taking place throughout the assessment of proposed site allocations and the wider development of the Plan. These elements of the plan-making process were iterative and supported each other in development. As such the assessment of the potential sites was being carried out as the understanding of the infrastructure needs was developing which provided additional value to that process. Also, the IDP was being refined in the knowledge of the likely site allocations which helped strengthen that work.

All site allocations were assessed against SA Objectives and via a site capacity assessment, as described in earlier questions in this Matter statement for Matter 4. These templates included consideration of infrastructure requirements, where needs for highways or new/improved services could be identified, to inform any requirements or mitigation that needed to be addressed in the site allocation wording.

Chapter eight of the Local Plan combines the topics of infrastructure and site allocations (CSD.001). As explained on page 143 of the Local Plan, the site allocations are organised according to the four quadrants or infrastructure areas of the city as defined in the IDP and each section of that chapter starts with a list of the key infrastructure (and design) considerations for that area. The site allocations are also named according to the infrastructure area they are located within as follows:

- North Infrastructure Area contains site allocation policies with a prefix of: SPN (i.e. Site Policy North)
- South Infrastructure Area contains site allocation policies with a prefix of: SPS
- East Area Infrastructure Area contains site allocation policies with a prefix of: SPE
- Central and West Infrastructure Area contains site allocation policies with a prefix of: SPCW

This has helped to ensure the close link between the two topics and that infrastructure needs are addressed throughout. The approach taken in the site allocation policies is to explicitly identify where there is an infrastructure requirement arising from that allocation, to provide clarity and ensure the policies are effective.

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

The site assessment process, that is outlined in BGP.002 is considered robust. It explains the stages of assessment and filtering, and how the different stages have led to the final list of 53 site allocations (made from 58 SHLAA sites) in the Regulation 19 plan (BGP.002d). As with

previous Local Plans undertaken for Oxford, the integration of the SA process into the site assessment/refinement process helps to ensure that sustainability considerations are intrinsic to developing site allocations. Alongside technical desktop assessment of sites, there has also been site visits, and substantial testing of assumptions with landowners and with statutory bodies such as the highways authority (COM.007), Environment Agency (COM.008) and Natural England (COM.009), to ensure that the site allocations are robust policies.

As was discussed in the Stage 1 hearings for LP2045 and in our response under Matter 1, Issue 3, Q4 and Q5, an unusual feature of the Local Plan making process in Oxford is that the testing of sites is focussed on whether each individual site meets the requirements to be allocated; all that are found to be so, are included in the Plan. We are aware that the site testing process in other councils is often focussed on determining which sites are the most appropriate for allocation compared to the others, in order to discount those that are not required to meet the identified needs. Due to our high housing need and limited number of sites, this is not a luxury that Oxford has, it is not a case of choosing one site over another, but generally taking forward all the sites we can where they do not significantly conflict with national policy or the Local Plan strategy.

We have also ensured that the cumulative impact of the site allocations is considered as far as possible through the SA process, as part of the Whole Plan appraisal (CSD.004a, chapter 6).

Issue 2 – General Site Allocation Requirements

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

Oxford is a constrained city which significant pressures for growth. Consequently, the spatial strategy seeks to support and actively manage growth in the city, while prioritising housing delivery (see: the Sustainability Appraisal (CSD.004a) and Policy S1 (CSD.001). An extensive site selection process has been undertaken to identify and allocate as many sites as possible using a 'no-stone-left-unturned' approach but, despite this, Oxford still has relatively limited sites within its tight administrative boundaries. As such, it is critical that site allocations make the most efficient use of land. One way in which the plan seeks to achieve this is through Policy HD2 (Making Efficient Use of Land). To ensure that the site allocation policies make efficient use of land and maximise densities, minimum dwelling numbers have been included in the site allocation policies.

To inform the minimum number requirements, we compiled site capacity assessments for every site (016 CAP) which included site visits and desk based assessments to identify physical, environmental and heritage constraints. We then consulted with internal specialist officers such as heritage and flooding officers, as well as with statutory bodies such as Historic England and the Environment Agency to create comprehensive site assessments. We utilised the knowledge of colleagues in Development Management and Urban Design teams to identify opportunities for development on the developable land and calculated comfortable minimum numbers based on the following densities: 100dph in City and District Centres, 80dph in gateway sites (in mixed use areas on the edges of city on the main road network) and 60dph in most other locations. Conservation areas are treated differently to reflect their unique characters which can range from densely packed and urban to ancient rural settlements. In many cases, the appropriate density in a conservation area will still depend on whether the site is in a suburban area, gateway or centre. However, when setting minimum densities for site allocations in semi-rural conservation areas, a density of approximately 35 dph has generally been assumed, although a higher density might be possible through testing at detailed design stage (see paragraph 3.8 of BGP.003). On sites which had more extensive constraints and challenges these densities were adapted to reflect the site specific characteristics. We then shared these assumptions with land owners for feedback before finalising the site allocation policy wording.

By developing minimum numbers it enables the capacity assumptions in the SHLAA to be more informed and gives assurance that the plan can deliver the housing requirement. It also provides more guidance for developers, stakeholders and decision makers on the minimum number of homes expected to be built on each of the allocated sites, making the site allocation policies more effective and demonstrating the plan's commitment to use land efficiently on these sites.

In direct answer to the second part of the question, yes: the policies are sufficiently flexible to be effective. It is important to note that as the requirement is for a minimum number of

dwellings there is sufficient flexibility for increased delivery, should this be demonstrated as achievable at detailed application stage. The minimums have been set at cautious levels following site-specific testing so that they should be achievable while leaving scope for detailed design to respond to constraints. Where the Council has proposed modifications to minimum numbers i(for example a minimum of 10 dwellings at Land at Meadow Land and Canalside, for consistency with the 10-dwelling threshold), the proposed wording is flexible.

The exception to site allocation policies having minimum numbers are the hospital and healthcare sites (Policy SPE1: Churchill Hospital, Policy SPE5: John Radcliffe Hospital, Policy SPE10: Nuffield Orthopaedic Centre, Policy SPE18: Warneford Hospital, Policy SPE15: Slade House, Policy SPE12: Rectory Centre, Policy SPE8: Manzil Way Resource Centre), Policy SPS9 (Littlemore). The NHS Trusts (Oxford Health NHS Foundation Trust and Oxford University Hospitals NHS Foundation Trust) own a number of sites in Oxford and will bring these forward according to their estate strategies.

Across its estate the Oxford Health NHS Foundation Trust 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 Trusts' sites to allow for estate planning. Until detailed proposals are drawn up and tested, then the estates strategy will be subject to change, and the Council does not know at this stage on which of the site housing will come forward. Whether the specific sites remain solely in their current use, draw in other uses, or change use can't be certain at this time, and the policy approach needs to allow for all those possibilities. Imposing a minimum housing number of any individual site would therefore undermine the effectiveness of the policies. The landowners' Statements of Common Ground support the capacity assumptions made for these sites. Therefore, no minimum housing number is included in the aforementioned polices, because it is considered more important that the Trusts are able to develop their estates in the most effective way for delivering their primary healthcare functions, and they must not be prevented from flexibly responding to needs over the plan period by a minimum housing number in the policies.

As such, we consider the minimum numbers to be justified, robust and an important tool by which we can ensure that housing delivery is optimised, in accordance with the objectives, growth strategy and spatial strategy of the plan.

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

The Oxford Local Plan 2045 should be read as a whole document, however, we consider that cross referencing applicable policies within the site allocation polices helps to provide structure and clarity for users of the plan. By cross-referencing policies throughout the plan it is easier to understand how policies within different chapters interact and need to be applied when considered alongside site specific features and constraints. For example, the site allocation policy wording may include details about a drainage issue on the site which needs to

be addressed while also signposting users to the more general requirements set out in Policy G6. It allows users to easily transition between key policy requirements throughout the plan while also anchoring the plan-wide requirements to the site-specific circumstances. The City Council wants to see all the site allocation policies deliver in a timely manner. It is considered that identifying and signposting established issues or features of a site within the allocation itself assists with the planning process and can therefore help delivery. We are confident in the level of assessment work which has been carried out in the development of the site allocation policies and believe this adds value to the Plan to the benefit of the next stages of the planning process.

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

The Oxford Local Plan 2045 has been informed by a Level 1 Strategic Flood Risk Assessment (Wallingford HydroSolutions, 2026, GRE.015), which identified the extent and variation of flood risk in the city from all sources, and provided information to support the application of the Flood Risk Sequential Test of Sites (Oxford City Council, 2026, GRE.017). This document sets out how the sequential approach and Sequential Test has been applied, in order to direct development to the areas of lowest flood risk possible, in accordance with national planning policy.

Paragraphs 4.1-4.6 of GRE.017 detail how the sequential approach and the Sequential Test were applied to the sites assessed through a multi-stage process, starting with the Oxford Strategic Housing Land Availability Assessment (SHLAA) (Oxford City Council, January 2026, HEA.003a). Figure 3.3 and paragraph 4.4 of GRE.017 explain that the potential capacity of sites identified in Flood Zone 1 considered for allocation is significantly less than the housing need identified. A cumulative capacity of sites in Flood Zones 1 and 2 were then considered, repeating the process to include Flood Zone 3a and lastly to also include brownfield Flood Zone 3b. Figure 3.3 demonstrates that the potential cumulative capacity of the sites when considered across all flood zones still results in a significant shortfall of the identified housing need. The physical constraints in Oxford, and the lack of new sites for development, mean that it has not been possible to direct all site allocations to Flood Zone 1. There are site allocations, including for residential development, in higher flood risk zones. This is particularly the case where there is existing development on brownfield sites which – if redeveloped – could offer wider sustainability benefits. In those instances, additional flood risk assessment would be required at the planning application stage and mitigation measures applied accordingly, to minimise risk as far as possible.

Following on from the Sequential Test, a Level 2 Strategic Flood Risk Assessment (SFRA) (Wallingford HydroSolutions, 2026, GRE.016) was undertaken which included a detailed assessment of those potential site allocations located in flood zones 2 and 3. It is important to ensure that flood risk is addressed comprehensively, therefore where it was considered necessary, specific information or requirements from the Level 2 SFRA were included in the

corresponding site allocation policy. This is to ensure that those requirements can be addressed through any future site-specific flood risk assessment. These are specific to that particular site and provide additional context to the policy requirements already contained in Policy G7: Flood Risk and Flood Risk Assessments of the Plan (CSD.001). The relevant site allocation policies also require a sequential approach to be taken within the individual sites, with more vulnerable uses to be located away from the highest flood risk in line with paragraphs 173-175 of the 2024 National Planning Policy Framework and the national Flood risk and coastal change Planning Practice Guidance. This approach, along with Policy G7 has been agreed with the Environment Agency as set out in the signed Statement of Common Ground (COM.008), particularly in reference to the relevant site allocations listed in Appendix A of that document.

Agreement has been reached with the Environment Agency on most site allocations. Where the Environment Agency maintains objections (Canalside, Osney Mead and Cowley Marsh Depot), the Council has taken discussions as far as possible and considers that the allocations are sound, as mitigation is available (for example, flood compensation on adjacent City Council-owned land at Cowley Marsh Depot). Agreement on 474 Cowley Road has been reached through a proposed modification recorded in the Statement of Common Ground (COM.008). In answer to the second part of the question, the Plan is therefore consistent with national planning policy on flood risk avoidance and mitigation.

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

Oxford is a complex city and there are complex multi-discipline interactions that need to be recognised when considering high buildings. The Oxford High Buildings TAN supports a thorough understanding of the city context and likely issues of importance that should inform any high building proposal. The TAN provides advisory guidance in relation to the consideration of high buildings supporting policies within the Local Plan.
There are two main ways that the High Buildings TAN is referenced in site allocation policies. Either the policy requires consideration of the TAN guidance to be demonstrated at application stage, or the policy states that if proposals will exceed the heights outlined in the TAN then they are likely to impact on the historic core of the city and so an LVIA will be required. Neither of these usages would undermine the policy approach or create a new policy requirement which sits outside of the main policy wording. Rather the references to the TAN are used to help provide greater clarity and guidance for users when they come to submitting a planning application. Again, the signposting of the TANs in the plan is used to help users appreciate the technical guidance that can support them and provide clarity about how applications will be assessed at application stage.

To help provide greater clarity about requirements for proposed new developments we would suggest a main modification to insert Appendix 2 of the High Buildings TAN as a new Appendix

6.4 (Indicative Building Height Thresholds) to the Local Plan. The wording is included as an annex to this matter statement.

We proposed that Policy HD6 should be amended to the following:

Applications for any building that exceeds 15 metres (or the height set out in Appendix 6.4 ~~that the High Buildings TAN says may be impactful in that area~~ if that is higher) will be required to provide extensive information so that the full impacts of any proposals can be understood and assessed, including:

Also, we propose modifying the following site allocation policies where the High Buildings TAN is currently referenced, as below:

Policy SPE16: Thornhill Park

Criterion f) amended as follows:

Development proposals that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in Policy HD6.

Policy SPCW2: Botley Road Sites around Cripley Road including River Hotel and Westgate Hotel

Criterion h) amended as follows:

Development proposals that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in Policy HD6.

Policy SPCW7: Nuffield Sites

Criterion f) amended as follows:

Development proposals involving taller buildings that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Applications must be supported by a full LVIA assessment so that the full impacts can be understood and assessed.

Policy SPCW8 – Osney Mead

Criterion j) amended as follows:

Development proposals involving taller buildings that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ should be designed with consideration of their impact on views and the Raleigh Park view cone (Policy HD6). Views from Raleigh Park and Boar's Hill to the historic core, views out of the historic core, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work, the key views should be discussed and agreed in advance in writing with the City Council.

Policy SPCW9 - Oxford Railway Station and Becket Street Car Park

Criterion i) amended as follows:

Development proposals involving taller buildings that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered. Prior to undertaking any landscape or visual assessment work (to support the masterplan- led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full LVIA assessment should accompany proposals so that the full impacts can be understood and assessed.

Policy SPCW10: Oxpens

Criterion l) amended as follows:

Development proposals involving taller buildings that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ should be designed with consideration of their impact on views. In particular, views out from the historic core, views into the site (e.g., from the Raleigh Park and Boar's Hill view cones), further views, and relevant local views into, out from and across the site should all be considered (Policy HD6). Prior to undertaking any landscape or visual assessment work (to support the masterplan-led approach, or development proposals), the key views should be discussed and agreed in advance in writing with the City Council. A full LVIA assessment should accompany proposals so that the full impacts can be understood and assessed.

Policy SPCW11: St Thomas School and Osney Warehouse

Criterion f) amended as follows:

Development proposals that exceed the height stated in Appendix 6.4 ~~the High Buildings TAN~~ may have an impact on the Historic Core Area and so will be required to provide an LVIA so that the full impacts can be understood and assessed as listed in Policy HD6.