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Dear Katharine

OXFORD LOCAL PLAN 2045 EXAMINATION STAGE 2 HEARING STATEMENT – UNIVERSITY OF OXFORD AND OXFORD BROOKES UNIVERSITY

I write on behalf of the University of Oxford and Oxford Brookes University ('the Universities) to provide below a Hearing Statement in response to the Inspector's Questions, further to our detailed Regulation 19 response.

Matter 5 – Site Allocations

As an overarching comment, the Universities would welcome greater flexibility within the site allocation policies by removing the prescribed minimum dwelling numbers from the following allocations:

- SPCW1: Banbury Road University Sites (Parcel B)
- SPCW12: West Wellington Square
- SPN1: Diamond Place and Ewert House
- SPN4: Oxford University Press Sports Ground
- SPS5: Crescent Hall
- SPE11: Oxford Brookes Marston Road Campus

The Universities recognise and support the Council's objective of maximising housing delivery in respect of mainstream housing sites. However, unlike conventional residential development sites, University estates are dynamic, mixed-use environments that must continually adapt to changing operational, teaching, research, accommodation and institutional requirements over the plan period. As a result, it is not appropriate to apply the same level of prescription or certainty regarding residential yield that may be expected for general market housing-led allocations. There is an incompatibility between the operational requirements of both Universities and making minimum commitments about their supporting residential estate beyond the mechanism captured in Policy H9. Greater flexibility is essential to allow the most appropriate form of higher education development to come forward on a site-by-site basis whilst still ensuring proposals accord with the wider spatial strategy and policy framework. A site may be required to meet an entirely educational or research need which would eliminate any residential target.

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Conversely, a site may be developed entirely for residential or disposed of to the mainstream housing market.

Paragraph 27 of the NPPF (December 2024) recognises Universities as a form of major infrastructure and requires plan-making authorities to have regard to the investment plans and future needs of such infrastructure providers. Whilst the revised NPPF no longer refers specifically to universities, Policy HC1 of the NPPF (August 2026) requires local planning authorities to plan for and allocate land specifically for public service infrastructure which by definition includes education. The policy affords considerable importance to providing for sufficient education facilities, in a way that aligns with the needs of the local population and any wider requirements for improvements in public service infrastructure. Given the long-term and evolving nature of university estate planning, the imposition of fixed minimum dwelling numbers risks constraining the ability of the Universities to respond to changing educational, research and operational requirements. Whilst housing delivery remains an important objective, it should not prejudice the flexibility required for Universities to continue fulfilling their strategic role within Oxford and the wider region.

Furthermore, the Universities should not be relied upon to meet the City's housing needs at the expense of their core educational and research functions. Whilst housing may form an appropriate component of redevelopment proposals, the allocation policies should provide sufficient flexibility to enable the Universities to maintain an appropriate balance between residential uses and the academic, research, innovation and operational facilities required to support their continued success and contribution to Oxford's economy and society.

We would therefore recommend the City Council make an assumption based on historic rates of delivery of residential units/bedspaces arising from higher education sites, rather than stipulate unworkable ratios in respect of specific sites. We would ask that the minimum numbers are removed from these policies and the Council supplements its housing assumptions with broader projections.

We would be happy to support the Council in drafting an appropriate Modification on this basis.

Issue 1 – West End and Botley Road Area of Focus

SPCW1 – Banbury Road University Sites (Parcel B)

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

Planning permission (22/02849/FUL) was granted on 29 November 2024 for the redevelopment of the site to provide student accommodation. The scheme has continued to progress, with a Minor Material Amendment application submitted in May 2026, which is currently awaiting determination by the Council.

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

The site benefits from an extant planning permission for student accommodation, confirming that the principle and deliverability of the proposed use have been established through the planning process. The ongoing progression of the scheme, including submission of a Minor Material Amendment application, further demonstrates the commitment to bringing the site forward during the plan period.

SPCW12 – West Wellington Square

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

A resolution to grant planning permission (25/03242/FUL) was issued on 6 October 2026 for the demolition and redevelopment of 25 Wellington Square, together with the refurbishment and change of use of 32-42 Wellington Square to provide student accommodation. The proposals include a new part three, part four-storey building accommodating academic and office floorspace, alongside flexible Class E uses. The application does not include the properties on Walton Street and St John Street, which also fall within the wider site allocation.

SPS5 – Crescent Hall

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

The site is currently occupied by Crescent Hall student accommodation and will come forward for redevelopment within the Plan period. Oxford Brookes University is actively looking at the site.

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

As set out above, Policy C8 and Appendix 7.6 of the Local Plan already establish the Council's approach to vehicular parking provision and set parking standards for new residential development. These policies provide the appropriate mechanism through which parking demand and provision should be assessed on a site-specific basis.

It is therefore unnecessary for a site allocation policy to impose additional parking requirements that go beyond, or potentially differ from, the wider development management framework. Site allocations should operate consistently with the overarching policies of the Plan, rather than introducing separate criteria that may duplicate or conflict with them.

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"?

The University of Oxford considers that the policy should be amended to allow for other suitable uses that have a demonstrable link to healthcare and/or education, rather than being limited solely to uses with an operational or research link to the hospital. This would better reflect the wider role of the Churchill Hospital campus as part of Oxford's integrated health, research and education ecosystem, recognising the close relationship between healthcare delivery, medical research, higher education and associated innovation activities. A broader policy approach would provide greater flexibility to support complementary uses that contribute to the strategic function of the site while remaining consistent with the overall objectives of the allocation.

We do not consider that the planning system is an effective tool to manage the health innovation and educational ecosystem on the site and that the NHS Trust and the University of Oxford are better placed to determine how the site should function in this regard. The policy is therefore not effective and would be contrary to paragraph 87 of the NPPF (December 2024) in terms of working against the potential of the cluster, imposing limits on its ability to play to its strengths. This approach is carried forward in Policy E1 of the NPPF (August 2026) which similarly promotes the growth of key economic sectors and clusters and requires planning policies to support, rather than constrain, their future development.

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)?

The University of Oxford understands rationalisation to be the consolidation of car parking into fewer, larger sites with potential for intensification. We therefore recommend the addition of 'improved car parking' under the suitable uses set out under criterion b).

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 John Radcliffe Hospital is an established strategic healthcare, research and innovation campus. The allocation reflects the continued evolution of the site and provides a framework for the delivery of healthcare, research, education and related supporting uses during the plan period.

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

As above, the University of Oxford considers that the policy should be amended to allow for other suitable uses that have a demonstrable link to healthcare and/or education, rather than being limited solely to uses with an operational or research link to the hospital. This would better reflect the wider role of the John Radcliffe Hospital campus as part of Oxford's integrated health, research and education ecosystem, recognising the close relationship between healthcare delivery, medical research, higher education and associated innovation activities. A broader policy approach would provide greater flexibility to support complementary uses that contribute to the strategic function of the site while remaining consistent with the overall objectives of the allocation.

We do not consider that the planning system as an effective tool to manage the health innovation and educational ecosystem on the site and that the NHS Trust and the University of Oxford are better placed to determine how the site should function in this regard. The policy is therefore not effective and would be contrary to paragraph 87 of the NPPF (December 2024) in terms of working against the potential of the cluster, imposing limits on its ability to play to its strengths. This approach is carried forward in Policy E1 of the NPPF (August 2026) which similarly promotes the growth of key economic sectors and clusters and requires planning policies to support, rather than constrain, their future development.

SPE11 – Oxford Brookes Marston Road Campus

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

The site is currently occupied by Oxford Brookes University's Marston Road Campus, which accommodates a range of teaching, research and associated university functions, principally for its healthcare courses. The site forms part of the University's established estate strategy and is under the control of a single landowner, providing confidence that it can be brought forward during the plan period.

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?

Criterion c) should be considered alongside criterion h), which encourages the retention and reuse of original building fabric. In some circumstances, the creation of new green infrastructure links or corridors could necessitate alterations to, or removal of, existing buildings and structures. The policy does not

explain how these potentially competing objectives should be balanced, creating uncertainty for applicants and decision-makers.

The Policy is overly prescriptive and some of its objectives are already addressed in other policies pertaining to the protection and enhancement of biodiversity, including Local Wildlife Sites, and for the conservation of heritage assets, including Non-Designated Heritage Assets. It is therefore unclear what additional purpose criterion c) serves beyond these existing policy requirements, other than to inhibit detailed design responses already guided by the overarching policy framework. The criterion is therefore not effective and should be deleted.

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

Oxford Brookes University considers that criterion h) should be removed from the policy. Whilst the principle of reusing existing building fabric can be beneficial in certain circumstances, criterion h) is effectively a site-specific expression of the broader approach set out in Policy R2, which seeks to prioritise the reuse and retention of existing buildings and building fabric. For the reasons set out in response to Matter 10, Issue 1, Question 6 (Policy R2), the Universities have concerns regarding the justification and effectiveness of policy requirements that elevate the retention and reuse of existing buildings or building fabric above other planning and sustainability considerations.

The suitability and feasibility of retaining or reusing existing building fabric is a matter that is best assessed through the planning application process, having regard to the condition, function, environmental performance and design requirements of any future proposals. Requiring this consideration through a site allocation policy is unnecessary and risks constraining the comprehensive redevelopment of the site and the ability to respond to future educational, operational and sustainability requirements.

In this respect, criterion h) duplicates matters already addressed through Policy R2 and introduces an additional layer of policy prescription that is neither necessary nor justified. Oxford Brookes University therefore considers that criterion h) should be deleted from the allocation policy.

<u>SPN1 – Diamond Place and Ewert House</u>

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

The allocation comprises the Summertown Car Park, Ferry Car Park, retail and residential properties along the Banbury Road frontage, and the University of Oxford's Department for Continuing Education building.

The allocation provides a framework for a mixed-use redevelopment of the site to deliver a mix of university-related, residential and supporting uses. The site is under the control of a limited number of landowners, including the University, and forms part of the University's long-term estate planning. As such, there is a reasonable prospect of the site coming forward during the plan period. Whilst redevelopment may be phased, the allocation provides an appropriate basis for the comprehensive development of the site as a whole.

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

No comment.

SPN4 – Oxford University Press Sports Ground

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

Policy SPN4 requires the capacity of sports provision to be retained unless it can be demonstrated that the facilities are surplus to requirements or that the loss of sports provision can be otherwise compensated for. However, it would be beneficial to be clearer as to what is meant by "compensated for". To ensure consistency with national policy, the wording should be amended to align more closely with paragraph 104(b) of the Framework, which permits the loss of sports and recreational land where it would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. This amendment would provide greater clarity to decision-makers and applicants and ensure the policy is fully consistent with national policy.

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

The University of Oxford is committed to delivering the site within the Plan period. The site is in a sustainable location and is not constrained by existing built development.

Matter 8 – Employment and Economic Development

Issue 1 – Community Employment and Procurement – Policy E3

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

The Universities are very supportive of the Policy and have consistently applied the preceding Technical Advice Note to its developments.

The questions posed by the Inspector are noted in respect of the effectiveness of the Policy, but there are also recent evidential matters which need to be raised to ensure a full examination of the policy. Whilst the policy itself refers to the preparation of a Community Employment Plan and identifies a range of matters that should be considered through that process, recent experience of its application since the Regulation 19 consultation is demonstrating that the impacts of the policy are being varied over time, the impacts of which are not considered in the evidence base for the Local Plan.

For instance, applicants are being required to commit to specific quantitative targets and employment outcomes, notwithstanding that such requirements are not expressly set out within the policy. More recently, targets expressed in the TAN have been lifted without any reference in the TAN or Policy that this process is designed to ratchet up over time. Moreover, the Local Plan Viability Assessment (Sup.002) offers no assessment of the Policy impact even though its application is now exceeding de minimus or best practice (p.90 refers)

Whilst it is our experience that the development community wishes to play its part in improving skills and local supply chain resilience, there are real world consequences for these targets and they impose a cost on construction and affect viability when considered alongside other policies. The Policy needs to be clear on what targets are being worked to over the Plan period and these need to be subject to proper consultation and viability analysis with development industry. In its current form, the Policy is not evidenced or sound in terms of effectiveness and appropriateness.

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Matter 10 – Climate Change

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

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

No comment

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

Policy R1 states that *"all energy needs (matching the development's total EUI figure) will be met through onsite renewable energy generating technologies in the first instance"*. The Universities wish to highlight the inherent inefficiencies associated with designing onsite renewable energy systems capable of meeting peak demand across all forms of development. In most cases, compliance is likely to be sought via rooftop solar photovoltaics; however this can create conflicts with plant requirements, maintenance access, and heritage considerations, resulting in sub-optimal design solutions and increased capital and operational costs. There is a risk that this approach diverts finite budgets away from measures that deliver more enduring carbon and energy performance budgets, such as improvements to building fabric and energy efficiency, the benefits of which persist throughout the lifetime of the building rather than for the operational lifespan of renewable technologies alone.

There are also significant concerns regarding the deliverability of the policy's fallback approach. Whilst any remaining energy balance can be met through offsite renewable energy generation, the effectiveness of this option is dependent upon the availability of suitable renewable energy projects, grid connections and supporting electricity infrastructure. In Oxford, where electricity network constraints are already a well-documented issue, there is uncertainty as to whether sufficient offsite renewable capacity can be secured to support future development over the Plan period.

This concern is particularly acute for higher energy-use development types, including university research facilities, laboratories, innovation space, advanced teaching facilities and other commercial or economic development uses supported by the Plan. Such uses often have significantly higher energy demands than conventional residential development and may have operational requirements that limit the extent to which their energy needs can be met through onsite renewable generation alone. This policy has the potential to exclude research buildings from central Oxford, despite such buildings being woven into the fabric of the City over the last 100 years.

In order for Policy R1 to be effective and justified, the evidence base should demonstrate not only that the policy aspiration is achievable in principle, but that there is a realistic and deliverable route by which compliant development can come forward throughout the Plan period. However, it is unclear whether the Council has assessed the likely cumulative energy demand arising from the Plan's growth strategy and tested this against available onsite opportunities, offsite renewable generation capacity and known grid constraints.

As drafted, there is therefore insufficient evidence to conclude that the requirements of Policy R1 can be consistently achieved across all development types supported by the Plan. Without robust evidence demonstrating that suitable offsite renewable capacity and associated infrastructure will be available when required, there is a risk that the policy places obligations on development that cannot realistically

be met in practice. The policy is therefore not currently justified by the evidence base and there are questions as to whether it is effective, given the absence of clear evidence demonstrating that the proposed approach is deliverable for higher energy-use forms of development over the lifetime of the Plan.

Furthermore, if compliance with Policy R1 is dependent upon factors outside the control of applicants, such as the availability of grid connections, network reinforcement or offsite renewable energy projects, there is a risk that otherwise acceptable development could be delayed or prejudiced for reasons unrelated to the planning merits of the proposal. The Plan should therefore provide further evidence of deliverability or introduce greater flexibility to address circumstances where the required energy infrastructure is unavailable.

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

No comment

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

As a last resort Policy R1 outlines that '*offsetting may be accepted to mitigate any remaining energy demand that cannot be sourced renewably either onsite or through an identified offsite location*', however, there is no evidence presented to define what the applicable charge would be and the implications on viability of schemes.

In addition, the Local Plan Viability Appraisal (SUP.002, Paragraph 6.43) estimates that the reduction in residual land values is typically 8% for operational Net Zero Carbon, whilst achieving both embodied and operational Net Zero Carbon would reduce residual land values by approximately 23–43%. These figures represent a substantial viability burden, especially for high-performance academic and research facilities, which typically face higher construction costs and operational specifications.

Whilst such impacts may, in a conventional development scenario, be absorbed through reduced land values, many university developments are delivered on land already in institutional ownership. In these circumstances, the additional costs cannot be offset through land acquisition negotiations and instead fall directly on the University's capital project budgets.

This concern is compounded by the significant cost inflation experienced across the construction sector in recent years, including increases in labour, materials and finance costs, which have already placed pressure on the viability and affordability of major capital projects. The cumulative effect of these market pressures, combined with the additional costs associated with meeting the requirements of Policies R1 and R2, risks undermining the deliverability of development that the Plan seeks to support. Currently, the cumulative impact of Policies R1 and R2, alongside other policy requirements, do not appear to have been tested against the particular development and funding models typically employed by higher education institutions.

We would also recommend that the policy is subject to further consultation and viability testing with the commercial science and research community as the policy formulation has only been subject to general consultation. The Universities would be happy to facilitate and coordinate engagement with the wider development community so the Inspector can be informed by the most robust evidence.

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

No comment

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

Policy R2a states that planning permission will be granted for proposals that demonstrate that '*re-use of any existing building has been explored and robustly demonstrated to be unfeasible before resorting to demolition'*.

The Universities are unclear what constitutes a requirement to have *"robustly demonstrated"* that re-use is unfeasible. In its current form, the policy creates an open-ended test, leaving the ultimate assessment to the judgement of the decision-maker at the end of the design and application process. As drafted, Policy R2a introduces a significant degree of uncertainty and subjectivity into the planning and design process. Given the substantial time and financial investment required to bring forward major development proposals, applicants and design teams need clear and objective policy criteria to inform decision-making and assess options. However, the policy provides no guidance on the circumstances in which re-use would be considered feasible or unfeasible, nor does it establish any measurable threshold against which proposals can be assessed. This reduces confidence in the planning process and creates unnecessary risk for applicants.

Policy R2a also goes beyond what is mandated by national policy. Whilst paragraph 161 of the NPPF (December 2024) encourages the efficient use of resources, including the retention and conversion of existing buildings where appropriate, it does not establish a presumption in favour of retaining existing buildings. Nor does it require applicants to demonstrate that the re-use of a building is "unfeasible" before demolition can be considered. The updated NPPF (August 2026) similarly does not introduce such a requirement.

Policy R2a therefore imposes an additional policy hurdle that is not supported by national policy. By requiring applicants to "robustly demonstrate" that re-use is unfeasible before demolition can be contemplated, the policy effectively creates a presumption in favour of retaining existing buildings and places the burden on applicants to justify redevelopment. This is materially different from the wording and intent of the NPPF, which encourages the re-use of buildings but does not require retention to be treated as the default outcome.

This distinction was considered by the High Court in *Marks and Spencer plc v Secretary of State for Levelling Up, Housing and Communities* [2024] EWHC 452 (Admin). In that case, the Court held that the NPPF encouraged the reuse of buildings but did not establish a "strong presumption" in favour of retention. The Court found that the Secretary of State had misinterpreted national policy by introducing a presumption and associated policy hurdle which was not contained within the NPPF, concluding that he had effectively "rewritten" the policy rather than applied it.

Therefore, Policy R2a goes beyond encouraging the consideration of retention and re-use, and instead creates a separate test requiring applicants to prove that re-use is not feasible before redevelopment can proceed. In doing so, it risks elevating one aspect of sustainable development above all other planning considerations, including the delivery of modern, efficient buildings that may better support operational, economic, educational or wider sustainability objectives.

As drafted, the policy is neither justified nor effective. It introduces an undefined and subjective threshold of "unfeasibility", provides no clear guidance on the evidence required to satisfy that test, and imposes requirements that are not found in national policy. Consequently, the policy creates uncertainty for applicants and decision-makers alike and raises concerns regarding consistency with national policy and the soundness of the Plan.

This issue is particularly relevant to the University of Oxford, whose 700-year-old estate comprises a diverse portfolio of buildings accumulated and adapted over many centuries. The Universities have a long-established track record of retaining, repurposing and extending existing buildings where this is practical and appropriate. However, it is not always possible to adapt existing buildings to meet evolving academic, research, operational or sustainability requirements. In some circumstances, demolition and redevelopment may represent the most sustainable and efficient use of a site when considered across the lifetime of a building. We are concerned that Policy R2a could be used as a reason in of itself to oppose change in the historic environment, as was seen in the Marks & Spencer case.

Q7: What are the thresholds in Policy R2 based on?

No comment

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

No comment

Matter 13 – Design and Heritage

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

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

No comment

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

No comment

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

No comment

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

No comment

Q5: Are the requirements set out in policies HD2 and HD6 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Policy HD6 states that '*Planning permission will not be granted for development proposed within a View Cone or the setting of a View Cone if it would harm the special significance of the view*'.

As drafted, the policy establishes an absolute restriction whereby any degree of harm, regardless of its scale or significance, would result in development being deemed unacceptable. This approach is not justified and is inconsistent with national planning policy, which requires planning decisions to balance identified harms against the benefits of development.

The policy therefore departs from the established planning principle that development proposals should be assessed on their individual merits through a proportionate balancing exercise. Given the extensive coverage of the View Cones and the Universities' continued need to deliver academic, research and commercial development within the city, the policy risks placing a significant constraint on growth.

The Universities therefore consider that Policy HD6 should be rebalanced to align with national planning policy by allowing decision-makers to weigh any identified harm to the special significance of a View Cone against the wider public benefits of a proposal. This would ensure that the policy protects Oxford's valued views whilst remaining justified, effective and consistent with the NPPF.

I trust that the information and submissions set out in this Hearing Statement will assist the Inspector in considering the matters raised and inform the forthcoming Hearing sessions.

Should you have any questions, please do not hesitate to get in touch.

Chris Pattison
Head of Planning