Oxford Local Plan 2045 Hearing Statement

The Oxford Science Park Partners Ltd Stage 2 Hearing Statement

Date of report: 10 November 2026

savills

Contents

1. Introduction 2
2. Matter 5 – Site Allocations 3
3. Matter 10 – Climate Change 5
4. Matter 11 – Infrastructure and Viability 7
Contact 8

1. Introduction

1.1. We are instructed by The Oxford Science Park Partners Ltd (hereafter referred to as 'TOSP') to submit a Hearing Statement in response to the published Matters, Issues and Questions for Stage 2 by the Inspectors of the Oxford Local Plan 2045 on 13 October 2026.

1.2. The Oxford Science Park is designated as a Category 1 Employment Site and is an allocated site under Policy SP9 of the Oxford Local Plan 2036. It is home to circa 100 emerging life science companies and is the headquarters of two of Oxford's most successful businesses, Novo Nordisk and Oxford Nanopore. In 2025, the western side of the Park was sold to the Ellison Institute of Technology (EIT) to enable a significant capital investment to expand EIT's Oxford Campus. TOSP retains the eastern portion of the Park where companies are growing rapidly and require significant additional research-led employment space.

1.3. This Hearing Statement covers Matters 5, 10 and 11 and builds on previous representations by TOSP to the Regulation 19 and Regulation 18 consultation for the Oxford Local Plan 2045. This statement should be considered in the context of those previous representations.

1.4. As confirmed with the Programme Officer, Ben Tattersall, a Planning Associate at Savills, and James Evans, Managing Director at The Oxford Science Park, will be attending the following hearings on TOSP's behalf to provide verbal statements:

- 1 December, Afternoon Session – Matter 7 – Type and Mix of Housing
- 2 December, Morning Session - Matter 8 – Employment and Economic Development

1.5. These Matters are not included within this Hearing Statement and are intended to be covered by verbal statements at the hearings, building upon previous representations submitted by TOSP to the Regulation 19 and Regulation 18 consultations. TOSP reserve the right to submit Hearing Statements to subsequent Stages of the Local Plan Examination, as well as to attend future hearing sessions.

2. Matter 5 – Site Allocations

Issue 2 – Cowley Branch Line Area of Focus

2.1 Q1 What is the justification for requiring financial contributions towards public transport enhancements, from trip-generating uses within a 1,500m buffer zone of the proposed Cowley Branch Line stations? How has the zone been established and is it based on appropriate available evidence?

2.1.1 Securing financial contributions from trip-generating uses in proximity to the proposed Cowley Branch Line stations is recognised by TOSP as necessary to ensure the impacts of development in this area of the City are mitigated and that development contributes to delivery of this important public transport improvement.

2.1.2 TOSP would be within the 1,500m buffer zone due to the planned delivery of a new station at the Park and this zone appears to reflect a reasonable station catchment area of where development within this zone would benefit from delivery of the Cowley Branch Line. It is noted that once the Cowley Branch Line is delivered during the local plan period, the requirement for financial contributions should fall away, as these contributions would no longer be justified.

SPS12 – Oxford Science Park

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

2.2.1 As set out in previous representations, TOSP strongly supports the continued allocation of the site for employment uses and other complementary uses to support development that modernises and intensifies the employment provision and creates an attractive environment for current and future occupiers. TOSP considers the SPS12 area has significant potential to deliver growth in employment floorspace over the local plan period.

2.2.2 The extent to which residential development is permitted by Policy SP12 appears to be assessed on a balanced judgement based on the criteria set out under Policy E1. The criteria include consideration to ensure the operation and integrity of businesses operating within the Park are not comprised as a result of residential development.

2.2.3 TOSP do not have the intention to deliver residential development within their landholdings within the SPS12 area at this point in time. TOSP would strongly support that the criteria within Policy E1 remain within the Local Plan to ensure existing businesses at the Park will not be compromised in the circumstance residential development is proposed within the SPS12 area during the local plan period.

2.2.4 Given the criteria set out within Policy E1, it is queried whether policy support for an element of residential development will be effective in delivering any housing over the local plan period given TOSP's current intent to not deliver residential development and the protections afforded to employment uses under Policy E1. Several of the businesses operating within TOSP create noise and fumes associated with their operations within science, technology and healthcare sectors, including associated plant and machinery and flue extract systems. Creating residential development within the SPS12 area should not create conditions in which existing businesses have unreasonable restrictions placed on them as a result of development permitted after they were established, as required under Paragraph 200 of the NPPF (2024) and Policy P2 of the NPPF (2026).

2.3 Q2 What is expected of development proposals under criterion g)? Is the provision of wider public access justified as part of any possible future expansion.

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

2.3.2 TOSP are committed to delivering high-quality and attractive environments within the Park, which has been reflected in various development proposals completed to date as well as recently consented developments. This includes provision of public realm within consented development at Plot 16 granted in 2021 (application ref: 19/02003/FUL), with Phase A now complete (also known as the Iversen Building) and Plot 27 granted in August 2025 (application ref: 22/02555/FUL). In the case of Plot 16, public realm has been designed to enable a direct connection to a future Cowley Branch Line station at TOSP, which would facilitate accessibility directly into TOSP for employees and visitors of the area.

2.3.3 While members of the public are able to enter the Park and TOSP are committed to providing public realm and open space as part of future development proposals, TOSP remains private property with an operational responsibility to manage the upkeep and security of buildings and associated external spaces for their businesses and occupiers. Therefore, it is requested that providing public access to on-site open space remains to be 'encouraged' rather than 'required' as it is not justified to require public access as this would compromise the operational requirements to ensure a safe and secure environments for businesses and occupiers.

3. Matter 10 – Climate Change

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

3.1 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?

3.1.1 Paragraph 161 of the Framework sets out that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. On this basis, the principle of integrating net zero principles are justified and consistent with national policy.

3.1.2 Notwithstanding the above, TOSP remains concerned in respect to Policies R1 and R2 for the reasons set out within this Statement and previous representations.

3.2 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?

3.2.1 Previous representations submitted by TOSP have objected to Policy R1 on the basis that the that the requirements are unachievable for R&D buildings which have higher energy uses.

3.2.2 The Council's evidence base, principally the Net Zero Carbon technical feasibility literature review (2026) (RES.001), confirms that energy intensive non-residential development have operational energy demands well above other non-residential development, such as normal office buildings. The review notes that the emerging UK Net Zero Carbon Buildings Standard contains much higher EUI allowances for these building types, including more than 200 kWh/m²/year in some science and technology uses. This is significant because Oxford's economy is heavily dependent on these types uses and the employment strategy of the Local Plan strongly supports science and technology uses over the local plan period.

3.2.3 It is considered that the Council's own evidence demonstrates that the requirements of Policy R1 cannot be realistically achieved and it remains unclear what higher EUI target will be considered acceptable where robustly justified for non-residential uses with higher energy demands.

3.2.4 It is wholly unrealistic for all energy needs for laboratory buildings to be met on site through renewable energy with EUI's more than 200 kWh/m²/year in some cases. While Policy R1 does support the ability to integrate energy storage on-site or the provision of energy from off-site locations, for the reason set out in previous representations this is considered wholly unrealistic and conflicts with other policies in the Plan in respect to the effective use of employment land and place-making principles.

3.2.5 Therefore, the default position for non-residential uses with exceptionally high energy demands will be provision of a proportion of energy needs through some on site renewable technologies and contributions towards the Carbon Offsetting in a scheme which will be managed and operated by the Council. The impacts of this on viability are addressed under question 4 below.

3.3 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?

3.3.1 It is requested that the Council clarify the justification for using a total Energy Use Intensity ('EUI') figure, rather than, for example, a Target Emission Rate ('TER'), which is supported in use under the NPPF (2026). As set out above, it is considered that the EUI targets are not achievable for non-residential developments with high energy demands, which is supported by the Council's own evidence base. It remains unclear what higher EUI target will be considered acceptable by the Council where robustly justified for non-residential uses with higher energy demands.

3.4 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?

3.4.1 TOSP do not consider that the requirements of Policies R1 and R2 have been subject to appropriate viability testing, particularly for non-residential development with high energy demands.

3.4.2 The Oxford Local Plan Viability Assessment (SUP.002) applies a generic assumption of costs associated for Policy R1 and R2. These costs claim to address situations where developments might not be able to fully meet onsite renewables requirements and some degree of offsetting is still required equating to 0.8-0.9% of construction costs, depending on typology, and that these costs are generally expected to fit within the overall allowances used in meeting net zero policy requirements. It is unclear what typologies this assumption is made on and no reference to specific testing of non-residential typologies with high energy demands which are likely to be subject to carbon offset costs under Policy R1. The Viability Assessment notes that it is not expected that typologies in Oxford will need to rely on offsetting as a standard to meet policy requirements. TOSP disagrees with this statement for the reasons set out in response to previous questions.

3.4.3 The assumptions used within the viability study, particularly in respect to offsetting costs, remain unclear in the absence of the anticipated offset price and calculation methodology being published by the Council. In the absence of these being defined within the local plan, it is questioned how can the assumptions for these costs be appropriately accounted for in the viability testing, particularly for non-residential uses with high energy demands which will likely need to utilise offsetting to meet policy requirements.

3.4.4 In summary, it is considered that the viability assessment does not sufficiently evidence that it has appropriately tested the requirements for Policies R1 and R2, particularly in respect to allowances for payments into the Policy R1 carbon offset fund specifically for high-energy demand typologies and uses. As a result, whilst the viability assessment demonstrates broad viability of non-residential development, there remains uncertainty as to whether the full costs of Policy R1 have been sufficiently tested for high energy uses that are central to the local plans economic strategy.

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

3.5.1 It remains unclear what evidence is expected of development proposals under Policy R2a. While this requirement is not a matter of objection for TOSP, it is requested that Oxford City Council clarify either through revisions to the policy wording or clarification during the Hearings as to what level of evidence would be expected and it is ensured that the evidence required is reasonable while acknowledging policy support for intensification of development on sites such as TOSP.

4. Matter 11 – Infrastructure and Viability

Issue 2 – Viability – Policy S4

4.1 Q1 Does the Local Plan Viability Assessment Update demonstrate that the growth proposed in the Plan will remain viable across all typologies in all locations?

4.1.1 The Local Plan Viability Assessment (SUP.002) demonstrates that the Plan's growth strategy is broadly viable and deliverable across many residential, commercial and employment typologies. However, it is noted that research and development floorspace has been tested under a generic office/R&D typology. This typology captures development across a broad range of development types which vary significantly in cost. Specialist research facilities and laboratories have significantly higher costs compared to a generic office development due to the specialist requirements for occupiers. Consequently, while the assessment suggests that generic Office/R&D development remains viable, it does not conclusively demonstrate that all forms of research and development floorspace, such as floorspace within the science and innovation sectors, envisaged by the Plan will remain viable. How this variance in development costs within the office/R&D typology has been accounted for within the Viability Assessment should be clarified.

4.2 Q2 The Viability Assessment states that where the cumulative impact of policies is concerned, the results are *"…hugely variable and it is likely that some trade-offs between policy objectives will be required at the development management stage"*. It then goes on to recognise that *"…this inevitably comes with the downside of a higher volume of site-specific viability testing at the development management stage."* However, is this approach consistent with the Framework and the PPG? Paragraph 59 of the Framework advocates that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable?

4.2.1 As set out within previous representations, the overarching concern is that proposed employment uses will be materially affected by the cumulative cost of proposed policies. This is in addition to amendments to the City's CIL Charging Schedule adopted in August 2025 – which resulted in a fivefold increase for R&D uses from £33.74 psm to £176.24 psm.

4.2.2 TOSP has significant concerns that the cumulative policy requirements expected from non-residential development will result in applications for non-residential floorspace, particularly within the research and development sectors, operating within the margins of viability, contrary to Paragraph 59 of the Framework.

4.2.3 While TOSP do welcome the mechanism introduced under Policy S4 for net zero and/or affordable housing contributions to be reduced or removed entirely from employment-generating uses via a viability cascade, requiring a higher number of applications to demonstrate site-specific viability testing will add unnecessary further cost and time to the planning process, delaying the delivery of much needed employment floorspace. These comments are also made notwithstanding TOSP's separate and previous comments on net zero and/or affordable housing policies set out within this Statement and previous representations.

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