JPPC
CHARTERED TOWN PLANNERS

JPPC ref: 6973
Respondent ref: 106

K Makant
Programme Officer
Oxford Local Plan Examination

SENT VIA E-MAIL

9th November 2026

Dear Ms Makant,

Oxford Local Plan Examination- Matter 4 and Matter 7
Submission for Oxford Centre for Islamic Studies- Respondent 106

1. We write on behalf of the Oxford Centre for Islamic Studies (Respondent 106) in response to the Inspectors' Matters and Questions in relation to their site on Marston Road which is allocated in the Plan under policy SPE3. This submission follows the submission of statements at Regulation 19 stage by the Centre.

2. In line with the Inspectors' request we limit this statement to issues raised in their recent Matters and Questions for the Stage 2 Hearings. This submission is to be read alongside earlier statements which we hope will aid the Inspectors in considering points relevant to the Centre's site and intended development.

Matter 4- Issue 3
Policy SPE3

Q.1) 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 development within the plan period for the uses proposed?

3. The site currently has several uses, predominantly though they fall in commercial use classes. The main building, Harcourt House, benefits from a lawful development certificate (LPA ref. 21/00284/CEU) confirming its use as an office falling within Use Class E. Buildings to the north are historically associated with Harcourt House and offer storage and offices. Space is also used by local army/air cadets. The northern portion of the site does not feature buildings and was last used as a car park. It is used by the Centre for various purposes on a short-term basis.

4. The Centre are committed to development of the site for its purposes. The land is a unique opportunity for the Centre being proximate to their principal campus and in their sole ownership.

5. The Centre's commitment to developing the site is evidenced in their advanced proposals. These have been progressed following adoption of the current Local Plan which offered the necessary policy support.

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6. The scheme has been subject of pre-application discussion with Oxford City Council with positive feedback. The Centre are able to lodge an application promptly.

7. It is though important to note that the current development proposals have been produced to meet the requirements of the current local plan. Were the policy related to development of this site to change significantly this would obviously impede submission of a planning application.

8. It is important that the allocation policy SPE3, including the supported uses for the site, remain as submitted. We also highlight the importance of the continued exemption from affordable housing requirements for campus developments as set out in our Regulation 19 submission (Rep. 106, paras 31-34) which is fundamental to viability and must be retained if the development is to progress.

   Q.2) What is the justification for requiring open space to be provided on site? Does this reflect the requirements in Policy G2?

9. The Centre value the location of the site amongst the green space of Headington Hill Park and development proposals have been developed to respond to this setting.

10. The advanced proposals are based on the current Local Plan policy for the site which is less prescriptive, stating: *"Green features and landscaping should be designed with consideration of how to link to Headington Hill Park".* The current policy is that required by the Inspector at examination of the Local Plan who required a similar requirement for open space as now proposed to be deleted; the Inspector's report states:

11. "In view of the proximity of open space, and in order to make the best use of the site, MM72 deletes the requirement for 10% of the site to be public open space, requiring the inclusion of landscaping instead" (OLP 2036 Inspector's Report, para. 172).

12. The current policy has allowed for proposals to respond to the site's particular constraints and opportunities, including optimising the environment in the proposal and adjacent park, while making best use of land as the Inspector intended. This site-specific approach can provide a better development than one dictated at plan making stage. Furthermore, with proposals at an advanced stage based on current policy it is counter-productive to alter site policy requirements without good reason, interrupting progress of well-advanced proposals.

13. We do not believe there to be any substantial change in circumstance or national policy which mean the previous Inspector's position on this issue would now be incorrect. The Centre's progress of proposals for the site have vindicated the current policy. We encourage modification of the proposed policy to reflect the current position and allow best use of the site.

    Q.3) Is it sufficiently clear what is meant by criterion o), which requires proposals to ensure that new development "mitigates amenity impacts on the setting of the adjacent park…" Is policy SPE3 justified and effective?

14. We believe this concern could effectively be addressed through modification to title this and subsequent points as 'additional guidance', rather than 'additional requirements. This will ensure the Council expectations are known while avoiding any concern there might be regarding soundness with binding requirements.

Matter 7- Issue 1- Affordable housing from student accommodation (H3)

15. As noted above, the current and proposed exemption from the requirement for affordable housing from development of student accommodation within existing and proposed university or college campus sites is vital to the Centre's progression of the site. The exemption is fully justified by the very different financial considerations for campus developments compared to standalone student accommodation schemes undertaken for commercial rent.

16. The situation is addressed more fully in the Centre's Regulation 19 statement at paragraphs 31- 34.

Matter 7- Issue 2- Employer linked affordable housing (H4)

17. The Centre has a need to provide housing for staff in support of its academic and institutional functions. The city's restricted housing market and extremely high house prices make it difficult to recruit and retain staff whose presence is important to the effective operation and development of the Centre and the City's economic vision.

18. We consider that its site (SPE3), which is to be developed as part of the Centre's campus, should benefit under Policy H4. This would support the Centre's ability to provide accommodation in accordance with its institutional requirements, with eligibility and allocation determined by the Centre according to those requirements. This would aid delivery of development on the site meeting housing need and contributing to the effectiveness and soundness of the Plan. This is further explained at paragraphs 35–38 of our Regulation 19 submission.

19. We trust this submission is of assistance and aids progress of these matters.

20. We will be pleased to elaborate on any matter should it assist the Inspectors.

Yours sincerely

[redacted]

David Burson LLB MSc. MRTPI
Associate
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