Oxford Local Plan 2045
Submission Draft (Regulation 19) Consultation

Response on Behalf of the Independent Oxford Alliance

12th March 2026

Introduction to the Independent Oxford Alliance Consultation Response

This submission is made by the Independent Oxford Alliance (IOA), a registered political party with 63 paying members and Councillors representing the electorate in four Wards within the City of Oxford. Our Councillors are directly engaged with residents, community groups and local businesses, and this response reflects concerns and priorities that have emerged through that ongoing democratic engagement.

We confirm that we have carefully read the Council's consultation guidance for the Oxford Local Plan 2045 Proposed Submission Draft (Regulation 19) and understand that this is the final opportunity for the public to comment on whether the Plan meets the tests of **soundness** set out in paragraph 36 of the National Planning Policy Framework (NPPF), and whether it is **legally compliant**.

We understand that all representations at this stage will be forwarded to the Planning Inspectorate and considered as part of the independent Examination in Public, currently expected in Spring 2027, and that further submissions will only be possible if specifically invited by the appointed Inspector.

In line with the Council's published advice, our representations:

- Focus on matters of soundness and legal compliance, including whether the Plan is positively prepared, justified, effective and consistent with national policy.

- Set out clearly and precisely, for each issue raised, the way in which we consider the Plan to be unsound or otherwise deficient.

- Propose specific modifications where we believe changes are necessary to make the Plan sound and/or legally compliant.

- Are supported by referenced evidence, including relevant policies and text from the Oxford Local Plan 2045, and appropriate extracts from the NPPF and associated national guidance, so that the Inspector has the material needed to understand and test our concerns.

Consistent with the Council's request that groups submit a single coordinated response rather than multiple duplicated individual comments, the Independent Oxford Alliance submits this unified document on behalf of our members and the communities we represent. We are authorised by our membership and Councillor group to make this submission, and the positions set out within it have been discussed and agreed through our party's internal processes.

We recognise that there will not normally be a later opportunity to expand or revise these comments unless specifically requested by the Inspector. We have therefore sought to ensure that this response is as clear, succinct and evidence-based as possible, while still providing the necessary detail and justification for each suggested modification.

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Part 1 - Internal Inconsistencies

Our analysis of the Oxford Local Plan 2045 finds several internal inconsistencies and conflicts; and some logical flaws emerge, primarily driven by the competing pressures of housing delivery, economic growth, and stringent environmental and heritage protections.

1. Conflict Between Net Zero Carbon Targets and Affordable Housing Viability

A primary logical tension exists in **Policy S4: Plan Viability**, which establishes a "cascade" for negotiations when development is unviable.

- **The Issue:** The policy prioritises environmental standards over affordable housing. Step 1 and Step 2 of the housing viability cascade allow for the reduction of energy offsetting payments and adjustments to parking requirements. However, the policy explicitly mandates that the development **must remain free of fossil fuel use**.

- **The Conflict:** If these measures do not achieve viability, Step 3 allows for a reduction in the number of affordable housing units. This creates a scenario where the plan's environmental goal (Net Zero) directly undermines its core social goal (addressing the "chronic undersupply" of housing and "acute housing pressures"). A development could be approved that meets net-zero standards but fails to provide the 40% affordable housing target required by **Policy H2** because the cost of being "fossil fuel free" makes the affordable housing element unviable.

2. Incompatibility Between Employment Growth and Housing Capacity

The plan's economic strategy may be logically at odds with its housing delivery capabilities.

- **The Issue: Policy H1** acknowledges that Oxford's housing need is **1,087 new dwellings per annum**, yet the city only has the capacity for **463 per annum**, resulting in a significant level of unmet need.

- **The Flaw:** Simultaneously, the plan identifies a massive need for **412,460sqm of employment floorspace**, particularly in the R&D sector. **Policy E1** seeks to intensify existing employment sites, which the plan admits is "likely to draw additional workers into the city".

- **The Conflict:** By aggressively supporting economic expansion that attracts more workers while concurrently admitting it cannot house even its current projected population, the plan may exacerbate the "high land values," "high property prices," and "limited supply of affordable housing" it identifies as primary challenges. This is a serious concern, given the already significant, ongoing level of unmet housing need.

3. Tension Between High-Density Mandates and Heritage/Height Protections

The plan sets ambitious density targets that may be physically or legally impossible to meet given its heritage constraints.

- **The Issue: Policy HD2** requires "very high-density development" (indicatively over 100dph) in the city and district centres.

- **The Conflict:** However, **Policy HD6** and the "Historic Core Area" designation impose strict height limits (typically 18.2m) to protect the "dreaming spires" and the iconic skyline. Furthermore, many site allocations in sensitive areas, such as **SPE14: Ruskin Field** and **SPE9: Marston Paddock Extension**, mandate that development be kept "low height" and "relatively low density" to reflect "semi-rural character".

- **The Flaw:** There is a fundamental spatial conflict between the mandate to "maximise capacity" and the requirement to remain "highly sympathetic to the sensitive setting" of 18 conservation areas and numerous listed buildings. The plan does not clearly reconcile how 100dph can be achieved within the height and character constraints of a historic core dominated by low-to-mid-rise collegiate architecture.

4. Technical Loopholes in Net Zero Policy

Policy R1: Net Zero Buildings in Operation contains a potential logical "escape clause" that could render its targets ineffective for the city's most significant growth sector.

- **The Issue:** The policy sets strict Energy Use Intensity (EUI) targets for residential and non-residential buildings.

- **The Flaw:** It allows these targets to be exceeded if "demonstrated to be technically unfeasible". Given that the plan's primary economic driver is R&D and laboratories—which are noted as having "exceptionally high operational energy demands"—this loophole could apply to a vast majority of the new non-residential floorspace proposed. If the most energy-intensive new buildings are exempted from the EUI targets, the city's 2040 net-zero target may be mathematically unsound.

5. Contradiction in Student Accommodation Impacts

The plan exhibits a contradictory stance on the benefits of purpose-built student accommodation (PBSA).

- **The Issue:** The **Policy Context for Policy H8** acknowledges that PBSA can provide "low-cost housing that takes the pressure off the private rented sector".

- **The Contradiction:** However, the same section argues that PBSA is "not a sensible approach" because it could "lead to a dominance of student accommodation" and "result in a high proportion of transient occupants" that would "undermine the desire to deliver mixed and balanced communities".

- **The Resulting Issue:** This ambivalence leads to **Policy H9**, which restricts university expansion unless student numbers in the private education sector are capped. If the universities cannot provide enough PBSA due to the "dominance" concerns, but are also forbidden from expanding academic facilities because of the number of students in the private education sector, the primary economic engine of the city (the knowledge economy) faces a growth ceiling not shared by other employment sectors.

6. Infrastructure Delivery vs. "Approval Without Delay"

There is a procedural conflict between the promise of speed and the requirement for complex mitigation.

- **The Issue: Policy S1** states that applications which accord with the Local Plan will be "approved without delay".

- **The Inconsistency:** However, **Policy S3** and many site allocations (e.g., **SPCW9: Oxford Railway Station**) require that development "mitigate their impact… at a rate and scale to meet the needs" and often rely on "critical infrastructure projects" that have long timelines.

- **The Flaw:** The requirement for extensive pre-determination evidence—including "targeted ecological surveys," "hydrogeological investigations," "Visual Impact Assessments," and "Health Impact Assessments"—renders the "without delay" promise logically unsound for major applications, as the evidence base required to "accord with the policies" is itself a source of significant delay.

Part 2 - Potential Conflicts with NPPF

Oxford Local Plan 2045 is broadly structured to reflect NPPF principles, but several internal tensions, logical weaknesses and potential inconsistencies with the (2023/2024) NPPF wording can be identified in the draft as it stands.

Below we have grouped issues by topic and cite the precise policies / passages involved, plus the NPPF references each time.

Housing need vs requirement and "significantly boosting" supply

1. **Large unmet need with limited spatial explanation**
   - The Plan identifies an objectively assessed minimum local housing need of 1,087 dpa via the Standard Method but then sets a requirement of only 463 dpa based on capacity (9,267 homes over 2025–2045). (Chapter 2, "Housing need and requirement" and Policy H1).

   - The Plan acknowledges this creates "unmet need" and states that "every effort has been made to maximise the identified capacity" but the Regulation 19 draft does not, within the policies, clearly show how reasonable alternatives (e.g. higher densities, broader Green Belt releases, or stronger use-mix flexibilities) were tested and rejected in order to demonstrate that not more of the 1,087 dpa can be met.

This risks tension with NPPF paragraphs on:
- "significantly boosting the supply of homes" and meeting needs "as much as possible" subject to constraints, and

- the duty to cooperate / alignment-policy requirement to deal positively with any unmet need in neighbouring authorities' plans.

The logical gap is that the Plan asserts capacity is 463 dpa but then uses that figure as a hard ceiling, rather than showing in policy terms how it has maximised all realistic capacity sources before accepting the shortfall.

2. Strong protection of existing dwellings can undermine the attempt to boost supply
- Policy H6 resists **any** net loss of dwellings, with only tightly drawn exceptions, and requires conversions for community uses to be laid out so they can be reverted to housing.

- Combined with very restrictive student and HMO policies (H7–H9) and the high on-site affordable requirement in H2, this strong protection of existing stock could restrict rational renewal / intensification and thereby indirectly cap capacity that might otherwise allow the requirement to be set closer to the 1,087 dpa need.

This cuts against the internal strategy statement that the Plan "maximises capacity" and may be seen as not fully consistent with NPPF's requirement that plans "seek to

meet the area's objectively assessed needs" unless specific, clearly justified constraints demonstrably prevent this.

Affordable housing requirements, viability and deliverability

3. Very high and inflexible tenure requirement (H2 vs NPPF viability test)

- Policy H2 requires at least 40% on-site affordable housing on sites of 10+ units, and at least 50% in or released from the Green Belt, with at least 80% of the affordable as social rent.

- The Plan states these levels are viable "for the majority of typologies", and Policy S4 then gives a cascade in which affordable housing is expressly prioritised over other obligations.

NPPF paragraph 35 (2023 text, carried into 2024 draft) says policies on contributions "should not undermine the deliverability of the plan", and plans should set contribution expectations "but" still ensure they are realistic overall. The logic issue is:

- S4 first allows reduction of net-zero offset payments (R1) and relaxation of parking standards (C8), but only *third* allows reduction in affordable housing and, even then, in a staged way that attempts to protect social rent as far as possible.

- This is a highly normative prioritisation which may make sense in Oxford's context, but it risks making schemes that could viably deliver a lower affordable % non-deliverable or forcing repeated viability disputes, which is exactly what NPPF and PPG seek to avoid.

In other words, the Plan says "plans have been viability tested so policy-compliant schemes are assumed viable" (S4) but then anticipates a fairly complex cascade of policy relaxation – suggesting that the plan-wide viability work is not in practice sufficient to assure deliverability as per NPPF 35 and the viability guidance.

4. Cumulative, overlapping affordable housing "asks" (H2, H3, H4, H12)

There is a potential internal and NPPF-viability tension because of multiple overlapping contributions:

- H2 requires 40–50% on-site affordable for C3 schemes.

- H3 then requires **additional** financial contributions to affordable housing from:
  - student accommodation of 24+ student units / 10+ self-contained units,
  - older persons accommodation (10+ units),
  - "major" employment-generating uses with 1,000 sqm+ GIA.

- H4 employer-linked housing dis-applies H2 but then requires 100% affordable employer-linked units plus a future mechanism for 40% of units to be transferred to a RP or Council if the employer ceases to need them, aligning with H2.

- H12 then again requires "affordable housing contributions where required in compliance with Policy H3" for older persons and specialist accommodation.

Individually, each policy may be justified, but taken together they impose:

- high on-site affordable ratios on general housing,

- contributions from employment and student accommodation **even where those uses may compete for the same constrained sites**.

NPPF (plan-making) requires the cumulative impact of all policies "does not undermine the deliverability of the plan". The Plan acknowledges parking policy C8, net-zero (R1) and affordable housing policies as the main viability risks but then *adds* strong affordable obligations on non-C3 uses (H3) without clear evidence, in the policy text, that the cumulative impact remains acceptable city-wide. That is a potential soundness/deliverability weakness.

Tight student policies vs managing housing pressures

5. Potential contradiction between H8/H9 and the stated aim of re-balancing the PRS

- The explanatory text acknowledges that directing more students into purpose-built accommodation can take pressure off the general private rented sector and help increase overall stock.

- However, Policy H8 constrains new student accommodation to a narrow set of locations: on or adjacent to campus/hospital/research sites; in the city or district centres; or on allocated sites. It expressly prohibits new PBSA in local centres and elsewhere.

The NPPF recognises that purpose-built student accommodation can help meet housing needs and relieve pressures on the wider housing market. The internal logic problem is:

- The Plan wants to minimise students in general housing, but the very tight locational constraints, coupled with the requirement for affordable housing contributions from PBSA (H3) and no dedicated allocations in many areas, could suppress PBSA supply and keep students in HMOs and C3 stock.

- H9 then restricts new academic development unless the universities are within thresholds for students living outside university accommodation (3,100 for Oxford, 5,750 for Brookes), effectively using academic floorspace policy as a lever to control student numbers.

In combination, H7 (HMO cap at 20% within 100m), H8 (strong locational limits), H9 (academic thresholds) and H3 (PBSA contributions) may be internally inconsistent with the strategic intent stated earlier in the chapter – to use PBSA positively to relieve pressure on the general housing stock.

Green Belt, net zero and "efficient use of land"

6. Strong Green Belt restraint vs "maximising capacity" for housing

- Policy H1 states that capacity has been maximised through the SHLAA and a Green Belt assessment, yet the Plan still sets the housing requirement well below need.

- At the same time, the spatial strategy and S1(g) emphasise directing development away from locations that would harm green and blue infrastructure networks and avoid loss of floodplain, "helping to maximise opportunities on brownfield sites first".

This is in line with NPPF's brownfield and Green Belt protection principles, but where there remains a large and acknowledged shortfall in meeting housing need, the Plan should clearly demonstrate that Green Belt and other constraints were weighed proportionately and that reasonable Green Belt releases (where least harmful) were properly considered. Because this explanation is light in the policy text, there is a risk that an Inspector might judge that the housing shortfall is being accepted too readily without a robust capacity/constraints trade-off narrative.

7. Net zero requirements and energy offsetting cascade

- The Plan states "all new proposals… must conform with the principles of securing sustainable development… ready for a net zero carbon future" (S1) and highlights Policy R1 "Net Zero Buildings in Operation", plus embodied carbon and retrofit policies, as central.

- S4 then explicitly allows energy-offset payments (under R1) to be *reduced* first in the viability cascade to make schemes viable, so long as the development itself remains fossil-fuel free.

NPPF emphasises that plans should support the transition to a low-carbon future, shape places in ways that contribute to radical reduction in greenhouse-gas emissions, and that policies should be internally consistent. Here:

- S1 and Chapter 5 text treat offsetting and net-zero standards as central to strategy, but S4 structurally treats offset contributions as the first thing to be sacrificed when viability is challenging.

- That creates an internal tension between the "net zero by 2040" objective and the practical operation of the viability cascade, weakening the Plan's climate ambition in application.

Spatial strategy, centres and sequential approaches

8. Tight sequential and centre policies may constrain necessary non-central economic growth

- Policy C1 defines a network of centres and then applies a sequential test for all "town centre uses" outside those, with a retail impact assessment threshold at a relatively low 350 sqm.

- At the same time, Policy E1 channels almost all new employment to Key Employment Sites and city/district centres and resists employment uses elsewhere except in narrowly defined circumstances.

NPPF supports a town-centre first approach for main town centre uses, but it also requires planning to promote a strong, competitive economy and allow sufficient flexibility to accommodate needs not anticipated. In Oxford's extremely constrained land market:

- The combination of a tight C1 sequential approach and E1's restrictions could unduly limit beneficial decentralised economic development (e.g. smaller edge-of-centre health / education / cultural uses) in otherwise sustainable, accessible locations, especially if suitable sites in defined centres are scarce or already heavily committed.

- The 350 sqm threshold for impact assessment is significantly below the default 2,500 sqm cited in older NPPF versions; while local reduction is allowed, the Plan will need robust justification to avoid being seen as imposing disproportionate evidence burdens that might undermine smaller schemes.

This can be criticised as potentially inconsistent with the NPPF expectation that policies do not impose unnecessary restrictions or burdens that could stifle competition and innovation.

HMO policy and mixed communities

9. Potential conflict between restricted HMO supply and affordable options for key workers

- Policy H7 caps HMOs so that within 100m either side of the principal elevation, HMOs must not exceed 20% of buildings, prohibits new purpose-built HMO, and requires compliance with amenity standards.

- The Plan recognises that HMOs "offer the only available and affordable solution for many people" but seeks to prevent "overconcentration".

NPPF requires plans to meet the needs of different groups including those who rent their homes and people who need more affordable options. The internal logical tension is:

- The Plan uses HMOs as an acknowledged safety valve for affordability, but H7 is drawn tightly enough that in high-demand areas the 20% cap may already be met, severely limiting additional supply.

- At the same time, H8 constrains PBSA supply, and H2's high affordable / social rent requirement may reduce delivery of new low-cost C3 stock.

In combination, this risks under-provision of low-cost rented accommodation, weakening the Plan's ability to meet the NPPF requirement to address housing needs of those who rely on the private rented sector.

Employer-linked housing design and long-term flexibility

10. Employer-linked housing (H4) may undermine mixed, balanced communities and long-term flexibility

- H4 allows, on a defined set of institutional sites, 100% employer-linked affordable housing, with occupancy tied to continued employment with the specified employer and a strong requirement that 100% of units remain so in perpetuity (subject to the fallback mechanism if the employer no longer needs them).

- The policy is intended to supplement rather than replace H2, but it explicitly dis-applies H2's normal affordable housing requirements on those sites.

Potential issues:

- Tying occupancy to employment can lead to mono-tenure, employer-dominated enclaves, which may not align with NPPF's objective of creating "mixed and balanced communities" and avoiding undue segregation by tenure or occupation.

- By exempting these sites from the usual H2 obligations, the Plan may allow large quantities of affordable provision that is not open to the wider local housing need, thereby partly frustrating the broader objective of meeting general affordable housing needs in Oxford, not only institutional staff needs.

The fallback that 40% must be transferred to a RP if employer demand ceases could also be criticised as weak: it implies up to 60% of the stock could remain in a limbo or be sold on the open market, which would effectively reduce the level of affordable housing stock, which is inconsistent with the strong affordable-housing priority in the overall Plan.

Infrastructure timing and dependence on major rail projects

11. Dependence on Cowley Branch Line and station upgrades could affect soundness

- Policy **S3** identifies Oxford Railway Station enhancements and reopening of the Cowley Branch Line (CBL) as "transformational projects" and expects certain sites to contribute.

- It then states that development proposals "which rely on the delivery of critical infrastructure projects" will only be permitted prior to completion where the Council is content that the infrastructure "will be in place within a reasonable timetable".

Given that both CBL and some station works depend on external funding and decisions, this creates a potential soundness risk under NPPF's tests of effectiveness and deliverability:

- The Plan relies on infrastructure it does not control, yet S3 could be used to delay otherwise sustainable development if the Council is not satisfied about timing – potentially in tension with the presumption in favour of sustainable development and with NPPF's emphasis on flexibility where infrastructure phasing is uncertain.

- The term "reasonable timetable" is undefined, creating uncertainty and a possible internal conflict with S1's statement that "applications that accord with the Local Plan will be approved without delay".

Presumption in favour of sustainable development wording

12. Replicating NPPF 11(d) without local nuance

- Policy S1 restates the NPPF presumption and repeats the 11(d) tests: where policies are absent or out-of-date, permission will be granted unless protected areas policies provide a clear reason for refusal, or adverse impacts would significantly and demonstrably outweigh benefits.

This is not wrong, but guidance shows that local plans should avoid simply copying national policy and instead explain:

- how "sustainable development" will be interpreted in the local context,
- which policies are key to achieving sustainability, and
- how conflicts between climate, heritage, housing delivery and economic growth will be weighed.

As drafted, S1 leans heavily on the national formula while simultaneously loading the Plan with strong constraints (heritage, Green Belt, climate, etc.). That can produce an internal ambiguity: applicants are told there is a strong presumption in favour, but in practice many proposals may fail one of the numerous restrictive policies, so the *effective* presumption becomes weaker than NPPF 11 intends.

Monitoring, flexibility and dealing with rapid change

13. Limited explicit policy mechanisms if housing delivery underperforms

- The Plan includes a Monitoring Framework in the document, but within Chapter 2 the policies do not clearly identify triggers or contingency actions if delivery falls materially below the trajectory implied by the 463 dpa requirement.

- NPPF expects plans to be flexible enough to adapt to rapid change, and for local authorities to respond if monitoring shows they are not delivering against requirements.

Given Oxford's tight capacity and heavy reliance on a small number of big employment and housing sites, the absence of explicit policy-level contingency (e.g. review triggers, safeguarded reserve sites, or density uplifts) is a potential soundness weakness: it is not clear how the Plan will respond if delivery is 20–30% below target over a sustained period.

Extent and inflexibility of low-car residential development (Policy C8)

Policy C8 "Motor Vehicle Parking Design Standards" requires low-car residential development (with no unit-allocated parking and only shared spaces for blue badge holders, car-club/pooled vehicles, servicing and specified "working drivers") where a site is: (a) within a Controlled Parking Zone (CPZ) or on a greenfield site immediately adjacent to one, (b) within 400m of frequent (at least 2 per hour) public transport services, and (c) within 800m of a local supermarket meeting a minimum floorspace and convenience-offer threshold. In all other locations, maximum parking standards apply, and large schemes must provide car-club or pooled cars.

While the objective of promoting sustainable transport and reducing car dependency is supported, the combined effect of these criteria is that large parts of Oxford that meet the CPZ/400m/800m test will be subject to a very restrictive, near car-free approach for ordinary residents. Concerns arise as to whether this approach is sufficiently flexible and inclusive when considered against the National Planning Policy Framework (NPPF), particularly in relation to balanced sustainable development, context-sensitive parking standards and realistic transport choices.

14. NPPF paragraph 8 – balanced sustainable development
Paragraph 8 of the NPPF confirms that achieving sustainable development means pursuing the economic, social and environmental objectives in mutually supportive ways. Policy C8 plainly supports environmental objectives (reduced car use, better air quality, support for active travel), but its low-car requirement applies uniformly across all qualifying locations, regardless of the socio-economic and personal circumstances of future residents, beyond blue badge provision and a narrow reference to "working drivers" such as NHS community staff.

For some groups of residents, continued access to a private vehicle may be essential or strongly justified, including: people with mobility impairments not eligible for blue badges, older residents, families with children, professional carers, those with family caring responsibilities outside their own home, shift workers, tradespeople whose work depends on tools/vehicles, and those whose employment is beyond the effective catchment of public transport even where bus frequency is nominally "good". The Plan's supporting text does not explicitly acknowledge these varied needs, relying instead on general references to Oxford's compactness and "excellent public transport". As a result, there is a risk that the environmental objective is advanced in a way that could compromise the social objective, contrary to the integrated approach expected in NPPF paragraph 8.

15. NPPF – promoting sustainable transport and setting parking standards

The NPPF's "Promoting sustainable transport" chapter (currently paras 104–117, with minor renumbering in later updates) expects plans to give priority to pedestrian and cycle movements and to support public transport, but also recognises that "opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making". When setting local parking standards, the NPPF states that authorities should take account of factors such as the accessibility of the development, the type, mix and use, the availability and opportunities for public transport, local car ownership levels and the need to ensure the adequate management of the local road network.

Policy C8 does embed some of these factors (it explicitly links low-car development to CPZ presence, proximity to high-frequency public transport and to local food shopping). However, it does not directly consider local car-ownership patterns, the needs of specific groups, or circumstances where residents may reasonably need a car even in relatively accessible urban locations. Nor does it provide an explicit mechanism within the policy wording for a site-specific assessment to demonstrate that a modest level of unit-related parking might be necessary in particular cases to avoid unreasonable hardship or exclusion.

In this sense, while C8 is clearly aligned with the NPPF's sustainable transport aspirations, it may be criticised as insufficiently flexible and not fully reflective of the broader range of considerations set out in the NPPF for setting parking standards.

16. NPPF highway impact test

The NPPF provides that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe after mitigation. Policy C8 seeks to reduce those impacts by limiting parking; it does not itself introduce a refusal policy based on highway impacts, and so is not in direct conflict with this part of the NPPF. However, if the low-car approach proves undeliverable in practice and leads to displaced on-street parking and enforcement problems (see below), the extent to which the policy successfully manages network impacts, as envisaged by the NPPF, is questionable.

Accessibility, inclusion and displacement parking

17. Accessibility and social inclusion

Car-free or low-car development can be challenging for certain groups, even in a compact city with relatively good public transport. Policy C8 recognises the need for blue badge spaces and for some spaces to be reserved for "working drivers" in low-car schemes. However, it does not explicitly address other legitimate car-dependent circumstances (such as carers with multiple destinations, shift workers outside normal public transport operating times, or tradespeople whose work depends on vehicle-borne equipment). There is a risk that, by treating all qualifying low-car locations in the same way, the policy does not fully secure inclusive access to housing and services for these groups, raising concerns against the NPPF's broader aims of meeting the needs of different groups and fostering inclusive, mixed communities.

To illustrate this point, consider this real-life, Oxford-specific scenario. For an individual living alone and reliant on regular visits for assistance and company, the ability for anyone within their support network to 'call in' is restricted by the strict parking constraints and the additional challenges of arranging impromptu visitor parking permits on-line.

18. Risk of displacement parking

Policy C8 relies heavily on the existence and expansion of Controlled Parking Zones to make low-car developments workable, and the supporting text notes that the aspiration is for the whole of Oxford to be covered by CPZs by the end of the Plan period. However, this is presented as an aspiration of "the city and the county councils" rather than as a firm, plan-level commitment with a defined timetable or delivery mechanism. In areas where CPZs are not yet implemented, or where enforcement is limited, there is a real possibility that residents of low-car schemes will continue to own vehicles and park on nearby streets, displacing parking pressures onto surrounding residential areas.

The Plan does not, within C8, provide a clear mitigation strategy for such displacement in the interim period before full CPZ coverage and effective enforcement are in place. Without such measures, there is a risk of increased local parking stress, conflicts with existing residents and practical enforcement challenges, which in turn could undermine the intended transport benefits and raise questions about the realism and effectiveness of the policy.

19. Deliverability and dependence on wider transport measures

The success of the low-car strategy depends on a range of wider transport and infrastructure changes described elsewhere in the Plan, including enhanced bus networks, strategic schemes such as the Cowley Branch Line, and measures such as traffic filters, workplace parking levies and zero-emission zones. Some of these projects are not yet funded or committed and are outside the City Council's sole control, depending on external partners and future investment decisions.

In this context, there is a legitimate concern that Policy C8, as drafted, assumes a level of public transport provision and city-wide parking management that may not be in place when individual schemes come forward, especially early in the plan period. This raises questions around plan deliverability under the NPPF, which expects policies to be realistic, effective and capable of implementation over the plan period, with due regard to infrastructure timing and funding.

A more flexible approach that explicitly allows site-specific assessments of parking needs – particularly in transitional areas or where public transport improvements are not yet secured – might better align with NPPF expectations while still strongly promoting sustainable modes.

Our Suggestions for resolving Policy C8's weakness and conflicts with NPPF

The aim of reducing car dependency and promoting sustainable transport set out in Policy C8 and the wider Plan is strongly supported by, and is consistent in broad terms with, the NPPF's environmental and transport objectives. However, the current drafting raises concerns about:

- the extent to which low-car requirements across all qualifying CPZ-adjacent locations adequately reflect varying resident needs and circumstances;

- the reliance on CPZ expansion and wider transport schemes that are not fully secured, with limited policy safeguards against displacement parking; and

- the lack of explicit policy mechanisms for site-specific flexibility in exceptional cases, as encouraged by the NPPF's guidance on setting parking standards and pursuing balanced, inclusive sustainable development.

It is therefore suggested that Policy C8 be refined to:

- retain a strong presumption in favour of low-car development in highly accessible locations, but

- introduce explicit scope for site-specific justification of limited additional parking where necessary to address particular accessibility needs or demonstrable risks of displacement, and

- better articulate how CPZ roll-out, enforcement and wider transport improvements will be coordinated with the phasing of low-car developments.

Over-concentration of Research and Development (R&D) Employment Uses

20. Heavy concentration of employment growth in Research and Development uses with minimal provision for industrial and logistics sectors. (Policy E1 and supporting text).
The Employment Strategy chapter identifies an overall employment floorspace need of 412,460 sqm to 2045, split as follows: Office 21,370 sqm; Research & Development (R&D) 345,004 sqm; Industrial 0 sqm; Storage & Distribution 46,086 sqm. The strategy emphasises strong demand for R&D and seeks to meet needs by modernising and intensifying existing employment sites, many of which are identified as Key Employment Sites (including science parks and research campuses), while explicitly making no provision for net additional industrial floorspace and only limited additional B8 space.

While R&D and knowledge-intensive sectors are clearly important to Oxford's economy, this distribution risks an over-concentration of new employment floorspace in R&D/office-type uses and a progressive erosion of the urban industrial and logistics base, particularly where existing lower-density industrial, warehousing or manufacturing sites are redeveloped or intensified for higher-value R&D uses.

21. NPPF paragraphs 7–8 – achieving sustainable development
Paragraphs 7–8 of the NPPF confirm that the planning system should pursue economic, social and environmental objectives in mutually supportive ways. The Plan's employment strategy promotes high-value economic growth in R&D and knowledge sectors, but by setting an industrial floorspace need of "0 sqm" and only 46,086 sqm

for storage and distribution, it offers very limited support for sectors such as manufacturing, small-scale industrial services, warehousing and logistics, all of which provide a broader spread of job types and skill levels.

Industrial and logistics areas typically support SMEs, trade and repair businesses, construction supply chains and local servicing firms, which often offer accessible entry-level and mid-skill employment opportunities for residents who may not be able to access high-skill R&D roles. A strategy that effectively caps industrial growth at zero and tightly constrains new B8 provision risks narrowing the range of employment opportunities and weakening the **social** dimension of sustainable development, even while it strengthens parts of the economic objective.

22. NPPF paragraph 31 – evidence-based plans

NPPF paragraph 31 requires that policies in local plans be underpinned by proportionate, up-to-date and relevant evidence about the economic needs of the area. The Employment Strategy explains that strong demand exists for R&D floorspace and notes a pipeline of major R&D schemes at Oxford North, Oxford Science Park, ARC Oxford, the West End and Botley Road. It then identifies 0 sqm of additional industrial floorspace need and a relatively modest quantum of storage and distribution need, but the Plan text does not clearly explain, in policy or supporting text, the evidence behind assuming no net additional industrial floorspace is required within Oxford itself.
It is not apparent from the Plan how the evidence base has:

- assessed long-term demand for urban industrial and logistics land within Oxford;

- evaluated the implications of allowing the "complete loss" of some existing employment sites to housing, as explicitly envisaged by the strategy; and

- considered the need to retain a diverse stock of employment sites, including those suitable for manufacturing, servicing, small workshops and last-mile logistics.

Without this clarity, it is difficult to conclude that the quantum and distribution of floorspace by sector are fully justified in line with paragraph 31.

23. NPPF – building a strong and competitive economy (Chapter 6, including the role of different sectors)

The NPPF requires plans to support economic growth and productivity, identify strategic sites, and meet anticipated needs over the plan period, while recognising the specific locational requirements of different sectors, including "logistics, storage and distribution", as well as knowledge-based industries. The Plan clearly supports the knowledge and innovation economy: Key Employment Sites include major science parks, university and hospital research campuses, and other high-value clusters, and Policy E1 strongly supports intensification and modernisation of those sites for employment use, with a particular emphasis on R&D.

However:

- Industrial floorspace need is set at 0 sqm for the whole period, effectively signalling no net growth in this sector within the city.

- Policy E2 restricts new or expanded warehousing, storage and distribution uses to existing Key Employment Sites and usually only where they support the main employment use or come forward as part of a wider masterplan, explicitly discouraging new large-scale B8 development because it is "low-density and does not generally make for an intensive land-use" in Oxford's context.

This combination may insufficiently recognise the locational requirements and functional importance of industrial and logistics activities, which typically need larger footprint sites and good access to the strategic road network and are difficult to re-provide once sites are redeveloped for higher-density laboratories or offices. It raises a question as to whether the Plan adequately supports a **range** of economic sectors, as envisaged by the NPPF, or primarily prioritises one (R&D/knowledge) at the expense of others.

24. Employment diversity, job accessibility and "last-mile" logistics
Industrial estates and smaller urban employment sites (including many of those listed as Key Employment Sites in Appendix 3.1, such as Horspath Industrial Estate, Garsington Road cluster, Nuffield Industrial Estate and other trade/industrial locations) currently accommodate small and medium enterprises, trade counters, repair businesses and local distribution activities. Policy E1 supports the "complete loss" of existing employment sites *not* designated as Key Employment Sites to other uses, including housing, provided certain criteria are met. While this can help meet acute housing needs, it also risks further reducing the stock of modest, flexible industrial and service sites within the city.

If urban industrial and "last-mile logistics" land is displaced out of Oxford:

- service and delivery trips may need to originate from farther afield, increasing travel distances, vehicle kilometres and associated emissions;

- construction, maintenance and repair industries may face longer journeys to jobs in the city;

- local SMEs may struggle to find appropriately priced and located premises, ultimately leading to a loss of services and facilities in the city, and requiring residents to make longer journeys to reach the facilities and services they need.

This could undermine both economic resilience and transport sustainability, given the important role of well-located industrial and logistics land in supporting shorter supply chains and more efficient urban servicing, and is not fully addressed within the Plan's employment or transport strategy.

25. Existing and emerging R&D capacity
The Employment Strategy itself notes that there is already a "strong development pipeline of R&D floorspace" across the city, including at:

- Oxford North,
- Oxford Science Park,
- ARC Oxford,
- the West End of the city centre, and

- Botley Road.

Many of these are regionally significant schemes which, in combination with Begbroke and other nearby science parks outside the city boundary, already provide a substantial quantum of R&D capacity in the wider Oxford economic area. The Plan does not clearly articulate in the policy text why an additional 345,004 sqm of R&D floorspace is required *within the city* over and above this pipeline, and how that level of provision has been balanced against the needs of other sectors and the need to safeguard land for industrial and logistics functions.

Given the high land values and intense development pressures in Oxford, once lower-density industrial or logistics sites are intensified for R&D or office uses, they are extremely difficult to re-provide within the built-up area. A more explicit justification for the scale of additional R&D floorspace, in the context of the existing pipeline and the city's constrained land base, would strengthen the Plan's alignment with the NPPF's requirement for a diverse, resilient economic strategy.

Our suggestions: for resolving the Plan's Employment Strategy weaknesses and conflicts with NPPF

The Oxford Local Plan's employment strategy clearly and coherently supports the city's role as a hub for research, innovation and the knowledge economy, and this is consistent in broad terms with the NPPF's emphasis on productivity and strategic economic assets. However, by identifying 345,004 sqm of additional R&D floorspace need, 46,086 sqm of storage/distribution need and 0 sqm of industrial floorspace need, and by tightly constraining new B8 uses and allowing the complete loss of some existing employment sites, the Plan risks:

- reducing the diversity of employment land within the city;
- limiting the availability of sites suitable for industrial, servicing and logistics activities; and
- narrowing the range of employment opportunities available locally, particularly for those not employed in high-skill knowledge sectors.

To better accord with the NPPF's requirements for evidence-based, balanced and resilient economic planning, it is suggested that the Plan should:

- more clearly demonstrate, with reference in the Plan text to the evidence base, how industrial and logistics needs have been assessed and why a 0 sqm industrial need is appropriate;
- identify how sufficient land and policy support will be maintained for urban industrial, servicing and last-mile logistics uses, including smaller sites and SMEs; and
- explain how the substantial R&D pipeline and proposed additional R&D floorspace have been balanced against the needs of other sectors and the objective of providing a wide range of accessible employment opportunities for local residents.

Where necessary, the employment strategy and Policies E1–E2 could be refined to provide stronger safeguards for industrial and logistics land that is critical to Oxford's economic diversity and day-to-day functioning, while still supporting modernisation and intensification of key R&D and office sites.

Part 3 - Representations on Site Specific Policies

Addressing all matters relating to site specific policies

1. Policy SPS3: Bertie Place Recreation Ground

Introduction

This representation relates to Policy SPS3 – Bertie Place Recreation Ground in the Oxford Local Plan 2040. SPS3 proposes residential development (minimum 25 dwellings) on part of the existing recreation ground, with a public playground and a MUGA (or equivalent teenage facility) re-provided on site, alongside flood-resilient design and biodiversity enhancements.

The representation recognises Oxford's acute need for affordable housing but raises concerns that, in this specific location, the scale and form of development envisaged by SPS3 would lead to an overall reduction in usable public green space, diminished recreational value, and environmental risks that are not clearly justified in the context of the Plan's own policies on health, green infrastructure, biodiversity and flood risk, and the NPPF.

Recreation Space and Community Use

SPS3 requires "adequate re-provision of the current recreation facilities to meet the needs of those who currently use the facilities and the new residents", stating that the playground must be re-provided on site and that replacement of the MUGA may be on or off site provided it still serves teenagers in the neighbourhood. This focuses on like-for-like facility types but does not address the quantitative and qualitative loss of general open grassed space that currently supports informal play, casual sport, dog-walking and social interaction across all age groups.

In practice:

- The proposed layout significantly reduces the extent of accessible, flexible green space, concentrating provision into a formal MUGA and relatively small play area.

- This risks undermining wider Plan objectives on promoting health, wellbeing and inclusive, flexible recreation, which rely not only on play equipment but on larger, adaptable open spaces.

To be justified and effective, SPS3 should demonstrate, with evidence of current and projected use, that the re-provided facilities (in size, layout and accessibility) genuinely meet the existing and future recreational needs of the neighbourhood, in line with Policies G2 (open space) and G3 (urban greening), rather than just replicating certain asset types.

Housing, Traffic and Car-Free Development

SPS3 sets a minimum of 25 dwellings and supports higher density on the developable part of the site, subject to flood and amenity constraints. The council's rationale is the pressing need for affordable housing, which aligns with NPPF objectives to significantly boost housing supply and provide for those in greatest need.

However:

- The site sits within a constrained street network and Flood Zone 3b; access/egress is already sensitive in flood events, and the policy highlights the importance of safe evacuation and careful surface-water management.

- "Low-car" or car-free development is likely to be pursued here, but SPS3 does not explicitly address how overspill parking onto surrounding streets will be prevented or managed, or how servicing and visitor access will be handled without harming local safety and amenity.

Given the flood, access and amenity context, the Plan should make clear how car-free expectations will be enforced and what supporting measures (e.g. CPZs, car-club provision, secure cycle links) are required to ensure that housing delivery does not simply displace parking and generate traffic pressures on neighbouring streets, contrary to NPPF principles on safe and suitable access for all users.

Environment, Biodiversity and Flood Risk

SPS3 identifies that:

- the site lies in Flood Zone 3b,

- it is within the impact risk zone for Iffley Meadows SSSI, and

- the entirety of the site is identified in the Local Nature Recovery Strategy (LNRS) as having potential to become important for biodiversity.

The policy therefore requires:

- no adverse impact on the integrity of Iffley Meadows SSSI;

- reduced surface-water runoff with sustainable drainage and an acceptable management plan (Policies G6, G7, G8).

- a retained buffer along the river and railway wildlife corridors; and

- biodiversity improvements aligned with LNRS measures.

These provisions are broadly consistent with the NPPF's approach to flood risk and biodiversity net gain, but two concerns arise:

- The policy does not explicitly acknowledge that building on part of an existing green, permeable and potentially biodiverse site in Flood Zone 3b is an exception to the general approach of steering more vulnerable uses away from high flood risk, and it does not clearly set out why there are no reasonable alternative sites for this scale of affordable housing.

- While LNRS alignment and SuDS are required, the Plan does not provide a clear, quantified comparison of existing biodiversity and green cover with what will exist post-development, nor how any net loss in functional habitat or green infrastructure will be avoided given the reduced open-space footprint.

In the absence of that evidence, it is difficult to demonstrate that SPS3 is fully justified in NPPF terms, particularly on the sequential test, flood vulnerability, and biodiversity net gain.

Safety, Surveillance and Accessibility

SPS3 requires a buffer along the river and railway and emphasises integration of SuDS into open space, but it is silent on crime-prevention and natural surveillance. The proposed new bridge and meadow/nature trail behind Wytham Street have potential to create valuable habitat and an additional walking route, but their relative separation from nearby homes raises issues:

- Poor natural surveillance and limited through-movement can reduce perceived and actual safety, particularly for children and teenagers, and may discourage use.

- This risks delivering nominal mitigation (a new nature area) that performs poorly as accessible, inclusive public space, contrary to NPPF expectations around creating safe, inclusive, well-used places and the Plan's own urban design aims.

Recognising police advice and embedding requirements for clear sightlines, lighting, overlooked routes and active frontages around new open spaces would strengthen SPS3.

6. Community Impact and Policy Alignment

Across the Plan, policies on health, open space, green infrastructure and resilient design stress the importance of:

- protecting and enhancing accessible local green spaces;

- promoting active lifestyles and mental wellbeing; and

- building climate-resilient, socially cohesive neighbourhoods.

In this context:

- The net reduction in flexible green space at Bertie Place, in an area without plentiful alternative parks, risks undermining those objectives, especially for children and households without private gardens.

- The trade-off between new affordable homes and loss of accessible green infrastructure is particularly acute here because the site already functions as an important local park, and alternative green spaces are not equivalent in distance, character or accessibility.

While the housing benefits are clear, SPS3 would be more clearly aligned with the Plan and NPPF if it showed that all reasonable options for securing similar affordable housing elsewhere, or on a smaller footprint/higher-density configuration with greater retention of open space, had been robustly considered.

Recommendations for SPS3 and Supporting Text

To improve justification, effectiveness and consistency with national and local policy, the following changes are suggested:

Quantify and Protect Recreation Value

- Include in the supporting text a clear assessment of current use, catchment and functions of Bertie Place, and set a minimum quantitative standard (area and type) for re-provided open space, not just facility types.

- Require that re-provision delivers equal or improved quality and usability of space for informal play, sport and general recreation for all age groups, with reference to Policy G2 and relevant open-space standards.

Strengthen Green Infrastructure and Biodiversity Requirements

- Make explicit that development must achieve at least no net loss of green infrastructure value and biodiversity on site (in practice, likely net gain), evidenced through Urban Greening Factor assessments and biodiversity metrics, in line with Policies G3–G6 and LNRS priorities.

- Require retention of as many mature trees as possible, robust replacement planting where loss occurs, and continuous habitat links between the retained river/railway buffer, the new meadow and surrounding green corridors.

Clarify Flood Risk Justification

- Explicitly reference application of the sequential and (where relevant) exception tests for development in Flood Zone 3b at Bertie Place, setting out in the reasoned justification why the housing here is considered to provide wider sustainability benefits that outweigh flood risk in line with Policy G7 and the NPPF.

- Require detailed FRAs to demonstrate safe access/egress for residents and park users, considering climate change and residual risk, and to show that surface-water flood risk on and off site is reduced where possible.

Address Traffic and Car-Free Development

- Clarify that the development is to be low-car, with robust measures to prevent overspill parking in surrounding streets, such as CPZ adjustments, car-club provision and high-quality walking/cycling links, consistent with Policy C8.

- Require a transport statement to assess and mitigate any impacts on local traffic, parking and safety arising from the new homes and reconfigured recreation space.

Improve Safety and Natural Surveillance

- Add specific design principles requiring natural surveillance, good lighting, clear sightlines and overlooked routes to the new playground, MUGA and nature/meadow area, informed by Secured by Design principles and police consultation.

- Ensure new paths and the bridge link are integrated into everyday routes to/from surrounding streets, schools and services, so that they are well-used and feel safe, rather than isolated.

Phasing and Community Engagement

- Require phasing so that either existing play facilities remain available until new ones are complete, or temporary provision is made nearby, to avoid a total loss of facilities during construction.

- Encourage ongoing community engagement (including with groups such as "Save Bertie Park") in finalising detailed layouts and play provision, to ensure that re-provided spaces genuinely meet local needs.

Review of Alternative Housing Options

- In the supporting text, acknowledge the tension between housing need and open-space protection at this site and confirm that the Council has considered (and will continue to consider) alternative sites or configurations for delivering equivalent affordable housing with less impact on established local green space.
-

These modifications would not remove housing from Bertie Place but would help ensure SPS3 is better justified, more closely aligned with the Plan's own green infrastructure and health policies, and consistent with the NPPF's requirements on flood risk, biodiversity, open space and creating healthy, safe communities.

2. Policy SPS8 – Land at Meadow Lane (Horse Fields), Iffley, Oxford

Introduction

This representation relates to the site known as "Horse Fields" at Meadow Lane, Iffley, currently included within the Oxford Local Plan under Policy SPS8 – Land at Meadow Lane. We understand that the Plan no longer attributes a specific housing number to this site in the housing trajectory, so that the allocation is retained as "residential" in policy terms but currently delivers zero counted homes over the plan period.

The representation requests that the site be removed entirely from the Local Plan as a residential allocation, on the grounds that it is heavily constrained, of doubtful deliverability, and no longer contributes in any meaningful way to the spatial strategy or housing supply.

Summary Position

The site's inclusion in the Local Plan as a residential allocation is no longer justified. The site now makes no quantified contribution to the Plan's housing requirement, yet remains subject to multiple environmental, heritage and planning constraints identified in Policy SPS8 and the wider Plan that severely limit its realistic development potential.

Retaining the allocation in these circumstances fails the tests of soundness in paragraph 36 of the NPPF: it is not **justified** (no clear, proportionate evidence that the site can deliver a useful outcome), not **effective** (unlikely to come forward within the plan period), and not clearly **consistent with national policy** on allocating deliverable and developable land for housing.

Environmental and Planning Constraints

The site is subject to at least the following significant constraints, many of which are acknowledged in the Local Plan text for SPS8:

#	Constraint	Description / Impact
1	Flood Zone 3b	The site lies within Flood Zone 3b functional floodplain; development in such locations is strongly restricted by national policy, and SPS8 requires a sequential approach and a detailed site-specific Flood Risk Assessment, limiting the developable area and adding substantial cost and uncertainty.
2	Conservation Area	The site is within the Iffley Conservation Area; any development must preserve or enhance its special character and appearance, significantly constraining form, scale, density and layout.
3	Heritage Assets	Grade II listed buildings such as Townsend Close and Tudor Cottage on Church Way lie nearby; the site is within their setting and also within the Rose Hill View Cone, so development must avoid harm to the setting and important views, further limiting massing and visibility.
4	Archaeology	The Plan notes potential for Iron Age and Roman archaeological remains; pre-determination evaluation and potentially mitigation will be required, adding cost and risk to any proposal.
5	SSSI Impact Zone	The site falls within the impact risk zone for Iffley Meadows SSSI; SPS8 and Policy G6 require demonstration that there would be no adverse impact on the integrity of this sensitive site, including careful control of surface and groundwater, which may significantly constrain drainage, layout and construction methods.
6	Ecological Value	The Plan requires detailed assessment of the site's value for invertebrates and protected species and delivery of mitigation/compensation to fully offset impacts, reflecting existing and potential habitats; this limits developable area and increases complexity/cost of any scheme.
7	Local Nature Recovery Strategy	The site is identified within the Local Nature Recovery Strategy as having potential to become important for biodiversity; proposals must demonstrate how they deliver LNRS-aligned biodiversity improvements, which may be difficult to reconcile with residential development on a small and constrained site.
8	Landscape Sensitivity	The semi-rural riverside setting, prominent views across the meadows and village, and inclusion within the Rose Hill View Cone mean that development would inevitably affect the visual character of Iffley; SPS8 therefore requires relatively low density and height and generous plots/green infrastructure, further reducing capacity.
9	Flood Risk History	Previous planning applications in this general area have attracted Environment Agency objections on flood risk grounds; this history, combined with the functional floodplain

		designation, suggests a continuing high level of regulatory risk to any development proposal.
10	Access Constraints	Meadow Lane and the immediate approach are constrained; any necessary road or junction improvements to serve new housing could be challenging to accommodate in a way that preserves the Conservation Area character and existing trees/hedgerows.
11	Sustainability Appraisal	The Local Plan Sustainability Appraisal records adverse environmental indicators for development in this location (flood risk, biodiversity, heritage), reinforcing the conclusion that it is not a suitable focus for growth.
12	Drainage Constraints	The need to protect the adjacent watercourse, manage functional floodplain, and reduce surface water runoff severely restricts options for conventional drainage; significant SuDS infrastructure would be required to achieve a safe and policy-compliant scheme, with doubtful feasibility in practice.
13	Loss of Greenfield / Local Land Use	The site is currently green open land historically used for horse grazing; development would result in the permanent loss of this greenfield character within a sensitive riverside and village context.
14	Cumulative Constraints	The combined effect of floodplain status, SSSI impact zone, conservation area, heritage setting, archaeology, biodiversity and access constraints renders the site highly constrained and, in practice, unrealistic as a location for residential development within the plan period.

These constraints are not marginal; they go to the heart of whether any viable and policy-compliant scheme is likely to come forward at all.

Soundness Assessment

Not Justified

- The Plan now relies on a housing requirement that must be met from sites which are demonstrably developable and deliverable within the plan period. Policy SPS8 no longer attributes any measurable housing yield to Land at Meadow Lane, yet retains it as a residential allocation despite its very clear constraints.

- There is no proportionate, up-to-date evidence in the Local Plan documents showing how this site can realistically deliver residential development without unacceptable impacts on flood risk, biodiversity, the Iffley Meadows SSSI, heritage assets and the Conservation Area.

In these circumstances, continuing to allocate this site for residential development is not justified.

Not Effective

- An allocation is only effective if it is capable of being delivered over the Plan period with a reasonable prospect of implementation. Given the combination of Flood Zone 3b functional floodplain, SSSI impact risk, tight conservation/heritage controls, ecological and archaeological requirements, and access constraints, there is no clear prospect of a viable, policy-compliant scheme progressing in the foreseeable future.

- The Council's own decision not to count any housing yield from this site reinforces the practical conclusion that it is not expected to contribute to housing delivery, and is therefore ineffective as part of a sound spatial strategy.

Inconsistent with National Policy

- The NPPF expects local plans to be positively prepared, justified and effective, and for housing land allocations to be deliverable and developable. Retaining a residential allocation that delivers no counted dwellings, in a location subject to such severe environmental and heritage constraints, is difficult to reconcile with these principles.

- In particular, the functional floodplain designation and SSSI impact risk raise serious questions as to whether this is an appropriate place for new housing when less constrained sites exist elsewhere and are already identified in the Plan.

Conclusion

Given the site's location within functional floodplain, the Iffley Conservation Area and Rose Hill View Cone; its proximity to listed buildings and archaeological interests; its position within the Iffley Meadows SSSI impact zone and the Local Nature Recovery Strategy; and the cumulative impact of the 14 constraints described above, the site is not suitable or realistic for residential allocation.

Its continued inclusion as a residential allocation in the Oxford Local Plan is unjustified, ineffective and inconsistent with national planning policy, and therefore undermines the overall soundness of the Plan.

Recommendation

Delete the Meadow Lane (Horse Fields) allocation (Policy SPS8) as a residential site from the Oxford Local Plan. If the Council wishes to maintain a policy for this land, it should instead designate it in a way that reflects its primary role as floodplain, ecological and landscape asset (for example as open space / nature recovery land), rather than as a putative housing site.

Procedural Note for the Inspector

If the Inspector considers that retention of the allocation may still be justified, it is requested that the Council be asked to present clear evidence demonstrating:

- how residential development could realistically be delivered on this site while meeting all the requirements of Policy SPS8 and other relevant policies (including flood risk, biodiversity, SSSI protection, heritage, conservation and access); and

- how such development would contribute to the Plan's housing supply, given that the current trajectory attributes no housing yield to the site.

In the absence of such evidence, deletion of the allocation is the only sound and consistent course.

3. Policy SPS7 – Kassam Stadium (linked to SPS11 and SPS13)

Introduction
This representation relates to the Kassam Stadium site and the adjoining Ozone Leisure Park area identified under Policy SPS7 – Kassam Stadium, and associated linked allocations SPS11 (Overflow Car Park at Kassam Stadium) and SPS13 (Redbridge Paddock). Policy SPS7 provides for residential-led development and public open space on the Kassam Stadium site, with a minimum of 290 new homes, and accepts employment-related uses as a secondary component subject to a masterplan that also covers SPS11 and SPS13.
The representation supports the principle of regenerating this area but raises concerns about the realism of timing and deliverability assumptions, and the interaction between existing leisure and R&D permissions, housing delivery, parking and infrastructure capacity over the plan period.

Summary Position
The Plan assumes that the Kassam Stadium and Ozone Leisure Park area will deliver a significant quantum of housing and associated open space and employment floorspace across SPS7, SPS11 and SPS13. However:

- Redevelopment of the main stadium site is in practice contingent on the relocation of Oxford United Football Club to an alternative stadium, which has not yet been fully secured.

- Ozone Leisure Park already benefits from planning permission for R&D development with a reconfigured leisure offer and reduced parking, which will influence how much additional change can realistically occur during the plan period.

Without clear phasing, contingency and transparent evidence on these points, there is a risk that the housing trajectory over-estimates what these sites can deliver, undermining the effectiveness and justification of the allocations.

Kassam Stadium – Availability and Deliverability
Policy SPS7 allocates the Kassam Stadium for "residential-led development and public open space" with a minimum of 290 homes, and recognises that the site currently performs multiple functions, including football stadium, conference, and other community uses. In practice, large-scale redevelopment of the stadium footprint for housing or mixed use is likely to depend on the relocation of Oxford United FC to a new stadium elsewhere, which remains subject to separate plan-making and decision-making processes.

Until there is a secured, deliverable relocation scheme with an agreed programme, the availability of the existing stadium land for substantial redevelopment within the Plan period is uncertain. Treating the full SPS7 housing number as available in the early or middle years of the period may therefore introduce risk into the housing trajectory and five-year supply unless the Council can demonstrate robust phasing assumptions and identify contingencies elsewhere in the supply to compensate for any delay.

Ozone Leisure Park – Existing Permissions, Parking and Leisure Provision
The Ozone Leisure Park, immediately adjacent to the stadium, already has planning permission for redevelopment that includes R&D floorspace and a reconfigured, reduced leisure offer with associated changes to parking provision. Implementation of this permission will:

- alter the current balance of leisure and commercial uses serving the wider community; and

- reduce on-site parking compared with the historic baseline, in a location that currently accommodates match-day and leisure traffic.

Any further redevelopment proposals promoted under SPS7/SPS11/SPS13 and wider transport strategies (including potential parking reduction under Policy C8) will need to demonstrate that sufficient parking and access are retained or re-provided to keep remaining leisure uses viable and accessible for local residents and visitors. Failure to do so could undermine the Plan's objectives for protecting community facilities, managing traffic and supporting a mixed, vibrant local centre.

Legal Compliance and Soundness Considerations
The Local Plan must be prepared in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, including consultation at Regulation 18, consideration of responses and publication of a Regulation 19 plan that is justified, effective and consistent with national policy. The issues identified at Kassam and Ozone do not in themselves demonstrate that the Plan has been prepared unlawfully, but they do go to soundness:

- **Justified** – It is not yet clear from the published evidence how the Council has taken account of the dependency of SPS7 on Oxford United's relocation, or of the existing R&D/leisure permission at Ozone, in estimating housing delivery, leisure retention and parking provision over the plan period.

- **Effective** – Without transparent assumptions on timing, phasing and fallback positions, there is a risk that the housing numbers attributed to SPS7/SPS11/SPS13 will not be delivered as anticipated, and that unintended impacts on leisure provision and local infrastructure could arise.

Clarity and transparency in the underlying assumptions are therefore essential to demonstrate that these allocations are capable of implementation in practice.

Site-Specific Concerns

Kassam Stadium

- Redevelopment of the main stadium land for housing or mixed use is practically contingent on Oxford United FC relocating to an alternative, deliverable stadium;

until that relocation is confirmed, the site is not genuinely available for comprehensive redevelopment.

- Reliance on the full SPS7 housing figure within the trajectory, without explicit phasing tied to relocation milestones or contingencies elsewhere, introduces risk to the robustness of the Plan's housing supply.

Ozone Leisure Park

- The existing permission for R&D development and reduced leisure floorspace will, if implemented, limit the scope for further change and may already reduce parking capacity serving leisure uses in the area.

- Any further reduction in parking or leisure floorspace, whether through additional redevelopment or application of low-car policies, could jeopardise the viability and accessibility of remaining leisure uses that currently serve local residents and visitors.

Taken together, these factors create potential tension between housing delivery ambitions, the protection of leisure/community facilities and the management of transport and parking infrastructure in this part of the city.

Suggested Modifications

To improve clarity, deliverability and soundness while respecting the strategic role of these sites, the following modifications are suggested:

Kassam Stadium (Policy SPS7 and supporting text)

- Clarify in policy or supporting text that comprehensive residential-led redevelopment of the stadium footprint will only occur once the relocation of Oxford United FC to an alternative, secured stadium is confirmed, with phasing of housing delivery aligned to the timing of that relocation.

- Update the housing trajectory and accompanying evidence to show realistic phasing for SPS7, identifying contingency sites or flexibility elsewhere in the supply should stadium relocation be delayed beyond the anticipated timetable.

Ozone Leisure Park (within SPS7/SPS11/SPS13 or supporting text)

- Confirm that redevelopment proposals must retain or replace an appropriate level of leisure provision to continue serving local residents and visitors, with any loss justified against relevant community facility policies.

- Require that sufficient parking (or equivalent, realistic access arrangements) is retained or re-provided to support the continued viability and accessibility of leisure uses, with parking strategy assessed alongside transport measures under Policies C6 and C8.

- Ensure that any housing or further commercial development is phased to align with the operational requirements and existing permissions affecting leisure and R&D uses, so that the area continues to function effectively during transition.

Illustrative policy wording (for supporting text or criteria) could include:

- "Comprehensive redevelopment of the Kassam Stadium site for residential-led uses will only proceed once the relocation of Oxford United Football Club to an alternative, secured stadium has been confirmed, with the timing and phasing of development aligned to confirmed site availability."

- "Redevelopment of the Ozone Leisure Park shall maintain or replace a suitable level of leisure provision to serve the local community and wider area, and shall retain or re-provide sufficient parking and access arrangements to support the continued viability and accessibility of those uses, in conjunction with the application of Policies C6 and C8."

These changes would not alter the strategic role of the Kassam/Ozone area but would provide the clarity and realism needed to demonstrate that the allocations are justified, effective and capable of implementation over the Plan period.

4. Policy SPS16 – Templars Square, Cowley

Introduction

This representation relates to Policy SPS16 – Templars Square, which allocates the site for a major mixed-use redevelopment including at least 500 net additional dwellings, town centre uses at ground floor providing active frontages, and supporting community, employment, health and leisure facilities. The policy recognises Templars Square as a key part of the Cowley District Centre and requires a masterplanned approach to ensure that redevelopment maintains its role as a vibrant, accessible hub for East Oxford.

The representation supports the objective of regeneration but raises concerns about the potential cumulative impacts of parking changes, traffic management measures and housing intensification on accessibility, vulnerable groups and the centre's retail and service function, in the context of national policy on town centres, transport and equality.

Summary Position

Policy SPS16 requires that Templars Square continues to function as a district centre with active street frontages and a mix of town centre and community uses, and that redevelopment "maintain this role and continue to be accessible to the public". It also states that:

- public realm should be enhanced for pedestrians, cyclists and wheelers,

- improved pedestrian and "wheeler" connectivity should be provided across Between Towns Road,

- the public transport interchange at Between Towns Road/Barns Road should be supported and enhanced, and

- "opportunities should be taken to consolidate public parking, with enough re-provided to support the needs of the centre", while residential development should be low-car.

These requirements are broadly consistent with the NPPF's aims for town centres and sustainable transport, but there is a risk that, in implementation, the combination of:

- reduced or reconfigured car parking,
- nearby Low Traffic Neighbourhood (LTN) and ANPR measures, and
- potential future congestion charging,

could cumulatively reduce accessibility for some user groups and undermine the centre's role for those who legitimately depend on car access. The Plan and policy would benefit from clearer safeguards and evidence on these points

Accessibility, Parking and the Local Shopping Function

SPS16 does not require the complete removal of car parking; it requires consolidation and re-provision of "enough" public parking to support the centre, with low-car expectations focused on new residential development. This is consistent with the NPPF's emphasis on prioritising sustainable modes while still recognising that different users and locations will have differing needs.

However:

- The policy does not define what level of public parking is considered "enough" for a district centre that serves a wide catchment, nor how impacts on disabled users, older people, families with children and those carrying bulk shopping will be assessed.
- Recent and proposed measures such as LTNs in Cowley and ANPR controls on Crowell Road already affect vehicle routes for Littlemore and other residents; any further effective reduction in usable parking or access could, in practice, discourage some users from visiting Templars Square.

Without clear standards and evidence on parking and access needs for different groups, there is a risk that redevelopment could unintentionally narrow the centre's user base, contrary to SPS16's requirement to maintain the role of the district centre and the NPPF's objectives for inclusive access to services.

Retail mix and shopping experience

SPS16 encourages a wide range of town centre and community uses, including retail, commercial leisure, financial and professional services, learning and educational uses, evening-economy uses, community facilities, medical/healthcare and other employment such as offices and small workshops. This breadth is positive, but the policy does not give explicit guidance on retaining essential day-to-day services (e.g. convenience food, pharmacy, banking/post office, affordable cafés) that underpin the district centre's role for less mobile and lower-income households.

If housing and higher-value commercial uses drive up rents or displace basic retail and service functions, residents may have to travel further afield for weekly shopping and essential services, potentially conflicting with the NPPF aim of supporting local centres and reducing the need to travel. This concern is particularly acute for those who rely on car access to carry bulk shopping or who have limited mobility.

Vulnerable Groups, Equality and Cumulative Transport Impacts

The NPPF and Planning Practice Guidance emphasise that transport policies and decisions should provide for people with disabilities and reduced mobility and support a choice of modes, while national equality law (Equality Act 2010) requires public bodies to have due regard to the needs of protected groups. SPS16 itself requires enhanced public realm and improved pedestrian and "wheeler" connectivity, which is positive for many users, but there are several cumulative issues:

- For some older people, disabled residents and families, access by private car or taxi remains essential for safe and practical access to a district centre, particularly for carrying shopping or using health facilities.

- LTNs, ANPR restrictions and any future congestion charging in the wider area may lengthen journeys or create perceived barriers to visiting Templars Square, especially if re-provided parking is more remote, reduced in capacity or more difficult to navigate.

National policy expects cumulative transport impacts to be assessed and mitigated, not just site-specific changes. It is therefore important that redevelopment proposals and associated transport strategies actively demonstrate:

- how the needs of vulnerable groups have been assessed (for example, through Equality Impact Assessment and engagement with affected communities), and

- how parking, drop-off, taxi access and public transport interchanges will be configured to ensure that Templars Square remains accessible to those who cannot reasonably switch to walking, cycling or bus use.

Without this, there is a risk of inconsistency with both the NPPF's transport and town-centre policies and statutory equality duties.

Heritage, Design and Urban Form

Policy SPS16 acknowledges that:

- Beauchamp Lane Conservation Area lies immediately west of the site,

- the Grade II listed Church of St James and 1 Beauchamp Lane lie just outside the boundary, and

- the site's elevated position on a ridge means that new development could affect views to and from the historic core.

The policy therefore requires:

- careful consideration of impacts on the conservation area and listed buildings,

- thorough assessment of townscape and visual impact, including a Visual Impact

Assessment in accordance with Policy HD6, and

- a masterplan that organises heights, massing and routes to avoid harm.

These provisions are broadly compatible with the NPPF's requirements for conserving and enhancing the historic environment. However, the scale of proposed housing (minimum 500 net additional dwellings) and the aspiration for "significant" intensification raise practical concerns:

- Without clearer height, massing and design parameters, there is a risk that pressures for tall or bulky residential blocks could conflict with the conservation and skyline sensitivities identified in SPS16 and Policies HD3–HD6.

- Piecemeal implementation could make it harder to maintain coherent design quality and active frontages across all phases, undermining the policy's aim for a high-quality district centre environment.

Stronger design coding and explicit references to acceptable height ranges, transitions and frontage treatments would reduce this risk.

Suggested Changes to Policy SPS16 and Supporting Text

To improve consistency with the NPPF and ensure SPS16 is justified and effective, the following refinements are suggested:

Parking and Accessibility

- Clarify in the policy or supporting text that parking consolidation must retain or re-provide a defined minimum level of public parking, including blue-badge bays and suitable short-stay spaces, to support the ongoing role of Templars Square as a district centre.

- Require development proposals to demonstrate, through Transport Assessments and Equality Impact Assessments, how the needs of disabled people, older residents, families with children and those carrying bulk shopping will be met, including drop-off/taxi facilities and clear, step-free routes between parking and shops.

- Make explicit that enhanced walking, cycling and wheeling provision is to **complement** rather than completely displace necessary car access for those with legitimate needs.

Retail Mix and Employment Protection

- Include supporting text indicating that redevelopment should safeguard a core mix of essential town-centre services (e.g. convenience food retail, pharmacy, everyday financial/postal services) unless robust evidence demonstrates a lack of demand.

- Encourage the retention or provision of flexible, smaller units suitable for SMEs, independent retailers and community uses, to maintain local employment opportunities and retail diversity.

Housing Density and Phasing

- Require a phasing strategy to ensure that key retail, community uses and functional parking remain available during construction, avoiding long periods when the centre is partially unusable or unattractive to shoppers.

- Make clear that residential development should be integrated in a way that supports, rather than undermines, the commercial viability, accessibility and active frontages of the district centre.

Transport and Cumulative Impact

- Explicitly require Transport Assessments for major redevelopment proposals at Templars Square to consider cumulative effects of LTNs, ANPR, parking changes and any proposed congestion charging on access to the district centre and to identify mitigation where necessary.

- Encourage specific measures such as improved bus frequencies and interchange facilities, clearly signed loading/unloading bays and delivery management plans to reduce congestion while protecting the functioning of local businesses.

Accessibility and Equality Safeguards

- Add a criterion that development proposals must demonstrate compliance with the Council's equality duties, including accessible design (e.g. level access, inclusive wayfinding, seating, toilets), and show how they have engaged with vulnerable and under-represented groups in shaping the masterplan.

Heritage and Design Sensitivity

- Strengthen references to design coding by requiring that any major redevelopment at Templars Square be guided by an agreed design code or detailed masterplan setting out height, massing, materials, frontage and public realm principles, specifically to protect the adjacent conservation area, nearby listed buildings and important views identified under Policy HD6.

- Make clear that any tall or bulky elements must be clearly justified against townscape and heritage assessments and may be inappropriate where they would harm key views or the setting of designated heritage assets.

These modifications would help ensure that SPS16 delivers much-needed regeneration and housing in line with the NPPF's aims for town centres and sustainable transport, while maintaining Templars Square's essential role as an accessible, inclusive district centre for the whole community.

5. Policy MRORAOF – Marston Road and Old Road Area of Focus

Introduction
This representation relates to the Marston Road and Old Road Area of Focus (MRORAOF) in the Oxford Local Plan 2045. The Area of Focus sits around the major hospital and university campuses on Headington Hill and Old Road and is intended to support intensification of health and research uses while improving access by sustainable modes and managing parking pressures.

The representation supports the objectives of reducing commuter parking, promoting public transport and active travel, and protecting local community facilities. However, it raises concerns that the proposed approach to Controlled Parking Zones (CPZs) and associated traffic management measures may not be fully justified or effective, and may risk inconsistency with the NPPF and the duty to promote healthy, inclusive and accessible communities.

Key Concerns

Parking, Access and Local Households
The Area of Focus text emphasises the need to manage commuter parking and to expand CPZ coverage around major employment and education sites. While this is understandable, there is limited publicly-available evidence within the Plan showing:

- how CPZ design (permit allocations, visitor parking, hours of control) will minimise additional costs and practical burdens on local households and visitors; and

- how access for patients, carers, tradespeople and those with irregular working hours will be maintained as hospital and university activity intensifies.

Without clearer evidence on likely parking patterns, permit costs and visitor arrangements, there is a risk that measures shift burdens from commuters onto residents and their visitors, contrary to the NPPF's expectation that plans support a range of users, including those with mobility or caring needs.

Traffic Displacement and Road Safety
Restrictions around key commuter routes and employment clusters can reduce on-street parking near destinations but may displace traffic and parking to neighbouring streets, including Old Marston and areas beyond the defined AoF boundary. The Plan recognises that traffic management is needed to support sustainable access to the Headington hospital and research cluster, but MRORAOF does not set out:

- how displacement risks will be assessed at the area-wide scale; or

- what complementary measures (e.g. traffic calming, 20mph regimes, junction improvements, pedestrian priority) will be used to avoid creating new congestion or safety issues on adjacent streets.

NPPF transport policy expects cumulative impacts to be considered and mitigated, not just immediate effects at the site boundary. A stronger link between MRORAOF and supporting highway/traffic evidence would help demonstrate that this test is met.

Construction, Service Parking and Large Developments
The AoF includes, or is adjacent to, several large development sites (for example along Old Road and Marston Road) that will generate construction and service traffic as they are built out. MRORAOF does not explicitly address:

- where construction workers, contractors and service vehicles will park during multi-year build programmes; or

- how such temporary demands will be accommodated without leading to unsafe or illegal parking on surrounding streets, particularly if CPZs are tightened at the same time.

NPPF requires that plans be effective and deliverable and that they anticipate infrastructure needs associated with planned growth. Additional clarity in MRORAOF on construction and servicing strategies would improve confidence in deliverability.

Environmental and Health Impacts
One of the AoF's purposes is to support access to major health facilities, and the Plan overall aims to improve air quality and reduce carbon emissions. If parking controls and route restrictions displace traffic or cause longer diversions, there is a risk of localised increases in:

- traffic volumes on certain streets,

- noise and air pollution, and

- perceived severance for pedestrians and cyclists.

The Area of Focus text refers to the need to improve active travel connections and public transport, which is positive, but MRORAOF does not clearly reference any area-specific air-quality or traffic modelling to show how these risks have been assessed and mitigated. In the context of NPPF paragraphs on promoting healthy and safe communities and on planning for sustainable transport, stronger evidence linkage would be beneficial.

Implementation and Enforcement
Effective delivery of CPZs and traffic measures depends on clear design and robust enforcement. MRORAOF anticipates expanded parking controls but does not:

- specify how enforcement capacity will be secured; or

- recognise that poorly designed or weakly enforced CPZs near community facilities (such as halls, schools or health centres) may fail to protect access to those uses.

If visitor and community users face high costs or complex access arrangements while enforcement against commuter misuse is patchy, the policy may not achieve its stated objectives and could undermine local facilities.

Soundness and NPPF Consistency

The concerns above primarily affect soundness rather than procedural legality.

- **Positively Prepared / Justified**: NPPF requires that policies be based on proportionate evidence and that alternatives be considered. MRORAOF would be strengthened by clearer reference to area-wide transport and parking studies that explicitly consider displacement, induced traffic and cumulative impacts from planned developments, and by showing why the proposed package of CPZs and traffic measures is preferred over alternatives.

- **Effective**: Effectiveness depends on realistic implementation of CPZs, adequate visitor and construction parking, and robust enforcement. At present, these matters are only addressed in broad terms in the AoF, leaving uncertainty as to how measures will operate in practice.

- **Consistent with National Policy**: The NPPF expects planning to promote healthy, inclusive and safe places, enable convenient access to services, and support sustainable modes while taking account of the needs of people with disabilities and reduced mobility. MRORAOF's broad objectives are consistent with these aims, but there is a risk of inconsistency in implementation if parking and traffic measures, taken cumulatively with surrounding schemes, significantly reduce accessibility for certain groups (e.g. disabled residents, carers, older people, and those needing to drive to hospital appointments) without adequate mitigation.

It would be disproportionate to characterise MRORAOF as "unlawful", but the current level of detail and evidence in the Plan makes it harder to demonstrate that the AoF is fully justified and effective.

Recommendations for Changes to MRORAOF

To address these concerns and improve alignment with the NPPF, the following amendments are suggested:

Evidence and Cumulative Impact

- Add explicit reference in the supporting text to the transport, parking and environmental evidence that underpins the AoF (e.g. area-wide modelling, parking surveys, air-quality assessments).

- Require that development proposals and any CPZ expansion in the MRORAOF area be supported by Transport Assessments that consider cumulative impacts, including traffic displacement to adjacent streets and effects on air quality and noise.

Parking Design and Management

- Clarify that CPZ design must ensure adequate, affordable permit and visitor provision for local residents, carers, patients and service users, with particular regard to those with disabilities or mobility impairments.

- Require that major development proposals within the AoF include a construction and servicing parking strategy, demonstrating how contractor and

service vehicles will be managed without causing unsafe or illegal parking on surrounding streets.

3. Safeguarding Community Facilities

- Include a criterion that CPZs and traffic measures around key community assets (such as community halls, schools, health centres and local shops) should be designed to maintain reasonable short-stay and blue-badge access, with time-limited bays or shared-use arrangements where appropriate.

4. Environmental and Health Safeguards

- Require that significant changes to traffic patterns or parking controls within the AoF be subject to proportionate air-quality and noise assessment, with mitigation (e.g. traffic calming, planting, low-emission bus routes) where risks are identified.

5. Phasing, Monitoring and Review

- Encourage a phased or pilot approach to new CPZs or traffic restrictions within MRORAOF, with monitoring of traffic, parking and environmental indicators, and a clear mechanism for adjusting measures if unacceptable displacement or access problems arise.

- Commit to ongoing engagement with residents and stakeholders, including hospitals, universities, parish councils and community groups, to review the effectiveness of measures and ensure they continue to support both sustainable transport and local accessibility.

These changes would retain the overall strategy for the Marston Road and Old Road Area of Focus but would provide the clarity, evidential linkage and flexibility needed to demonstrate that the policy is justified, effective and consistent with national planning policy and broader sustainability objectives.

6. Policy SPN3 – Oxford North Remaining Phases (and Northern Edge of Oxford AoF)

Introduction

This Policy allocates land for mixed-use development including knowledge-economy employment and a minimum of 161 dwellings. The site forms part of a Key Employment Site and sits within the Northern Edge of Oxford Area of Focus, adjacent to strategic sites in Cherwell and close to the Oxford Meadows SAC and several SSSIs.

While recognising the need for housing and economic development, this representation raises concerns about environmental protection, flood risk, affordable housing, infrastructure capacity and the strategic planning context. Taken together, these matters go to the soundness of SPN3 and its consistency with national policy, rather than suggesting that the policy is procedurally unlawful in isolation.

Environmental and Biodiversity Impacts

Policy SPN3 acknowledges that the site is within the impact-risk zones for Wolvercote Meadows SSSI and Pixey and Yarnton Meads SSSI and requires assessment of groundwater and surface-water flows and, where employment is proposed, an air-quality assessment to demonstrate no impact on SSSIs. It also requires that at least 15% of the total site area – and 15% of each residential parcel – be provided as green public open space, and that parts of the site identified in the Local Nature Recovery Strategy (LNRS) be enhanced for biodiversity.

However:

- The site is part of a wider green and semi-open landscape that contributes to ecological connectivity between the city edge and the floodplain meadows; earlier phases of Oxford North have already reduced greenfield habitat, and further development risks incremental loss of corridors used by birds, invertebrates and small mammals.

- Recreational and traffic pressures from additional housing and employment may increase visitor use of nearby meadows (including dog-walking) and add to air-quality burdens on sensitive habitats, but SPN3 does not explicitly address recreational pressure on the Oxford Meadows SAC or set out specific mitigation (e.g. on-site alternative natural greenspace, dog-walking routes, or access management).

Given the site's proximity to European and national designations, SPN3 should more clearly demonstrate, through Habitats Regulations Assessment and related evidence, that likely significant effects on Oxford Meadows SAC and nearby SSSIs can be ruled out or adequately mitigated, in line with the Conservation of Habitats and Species Regulations 2017 and NPPF requirements on biodiversity and protected sites.

Flood Risk and Climate Resilience

SPN3 places the site in Flood Zone 1 but requires assessment of groundwater and surface-water flows, a 10 m buffer to balancing ponds, and sustainable drainage to reduce runoff. The wider Plan (Policies G7 and G8) also requires site-specific FRAs and SuDS to ensure no increase in flood risk on or off site, with climate-change allowances. In this context:

- The cumulative hard-surfacing and ground re-profiling across all Oxford North phases may affect local hydrology, including pathways that influence groundwater-fed meadows in the SAC/SSSIs. SPN3 does not clearly set out how cross-phase drainage, infiltration and groundwater management will be handled to avoid unintended impacts downstream.

- Given increasing extreme rainfall, there is a need for robust assurance that development will remain safe over its lifetime without increasing flood risk elsewhere and that SuDS and buffers will be sufficient in practice, not just in principle.

To be fully justified and effective, SPN3 should explicitly tie remaining phases into a comprehensive site-wide flood-risk and drainage framework for Oxford North, demonstrating long-term climate resilience and no adverse effects on sensitive hydrological receptors, in line with NPPF guidance on flood risk.

Affordable Housing and Viability
The Plan's general affordable housing policy expects up to 50% affordable housing on qualifying sites, subject to viability, with tenure mixes set out in Policy H2. For a strategic site such as Oxford North, local communities reasonably expect a substantial affordable-housing contribution.

However:

- Stakeholders including Wolvercote and Summertown & St Margaret's Neighbourhood Forums have raised concerns that viability assessments for later phases may lean heavily on developer profit assumptions (e.g. around 16.5%) and conservative land-value benchmarks to justify reductions below policy-compliant affordable housing levels.

- SPN3 itself does not restate affordable housing expectations or require any specific viability-review mechanism; nor does it require transparency or independent scrutiny of viability evidence at reserved-matters or later phases.

In line with NPPF guidance that plans should be deliverable, but that viability should not be used routinely to reduce affordable housing, SPN3 would be stronger if it:

- reaffirmed that remaining phases are expected to deliver policy-compliant affordable housing unless robust, independently reviewed viability evidence demonstrates otherwise; and

- required late-stage or review-mechanism clauses so that if sales values and profits exceed initial projections, additional affordable housing or contributions can be secured.

Infrastructure, Transport and Local Services
The Northern Edge of Oxford Area of Focus highlights that Oxford North and adjacent sites will significantly increase demand on the A34, A40 and A44 corridors, and emphasises the need for improved walking, cycling, wheeling and public-transport connections, including to Oxford Parkway and Cherwell's PR6 allocations. It also identifies the need for contributions to primary-school expansion and other social infrastructure.

Despite this, concerns remain that:

- Existing congestion and air-quality issues on the A34/A40/A44 corridors could be exacerbated by cumulative development (Oxford North, Cherwell PR6 sites and Pear Tree Farm), especially if modal shift targets are not achieved.

- SPN3 does not clearly specify what transport mitigations, active-travel links and public-transport enhancements are required from the remaining phases, or how these relate to the Infrastructure Delivery Plan and the Area of Focus requirements.

- The capacity and funding of schools, healthcare and policing to absorb additional population are not spelled out within SPN3, leaving uncertainty about how essential services will keep pace with growth.

To be effective and consistent with NPPF objectives on sustainable transport and social infrastructure, SPN3 should:

- cross-reference specific infrastructure requirements for the remaining phases (e.g. defined contributions to school places, healthcare and public-transport improvements), and

- require transport assessments for later phases to consider cumulative impacts with adjacent Cherwell allocations and the wider network, with clear mitigation commitments.

Design, Character and Relationship with Neighbours

SPN3 and the Northern Edge of Oxford AoF accept high-density development and "landmark buildings" in this gateway location, subject to careful design and views from Port Meadow and Wolvercote Conservation Area. This is understandable in principle but has raised local concern:

- Some existing buildings (such as the Red Hall) are perceived as out of scale and visually discordant with nearby residential areas, prompting fears that later phases will further erode local character.

- SPN3 requires an accessible, permeable layout with clear distinctions between public and private realms and good surveillance of the public realm, but does not provide more specific parameters (height, massing ranges, materials) to guide the remaining phases in responding sensitively to Wolvercote's setting and long-distance views.

In line with NPPF policies on good design and conserving heritage, SPN3 would benefit from stronger links to design codes or detailed guidance (e.g. the High Buildings TAN) that explicitly define height and massing expectations, edge treatments, and transitions to existing neighbourhoods, and from emphasising meaningful community engagement on key buildings and public spaces.

Strategic and Legal Context (Duty to Cooperate and Housing Need)

The Planning Inspectorate's recommendation to withdraw the previous version of the Oxford Local Plan 2040 cited concerns with the council's approach to housing need and the Duty to Cooperate. Those findings raise broader questions about the robustness of the plan-level strategy under which SPN3 sits, including:

- whether overall housing numbers and distribution (including at Oxford North) are based on a sound, policy-compliant housing-need calculation; and

- whether cross-boundary issues – particularly transport, environmental and infrastructure impacts shared with Cherwell and West Oxfordshire – have been addressed collaboratively as required by the Planning and Compulsory Purchase Act 2004.

These issues do not, by themselves, render SPN3 legally invalid, but they do underline the importance of ensuring that the allocation proceeds within a revised, sound and legally robust strategic framework. It may be appropriate to review SPN3 once the Local Plan has been updated to address the Inspectorate's concerns.

Recommendations for Changes to Policy SPN3
To address the issues above and improve soundness and consistency with national policy, the following changes are recommended:

Strengthen Environmental and SAC/SSSI Safeguards

- Require that any further residential or employment development under SPN3 demonstrate, via Habitats Regulations Assessment, that there will be no adverse effect on the integrity of Oxford Meadows SAC and nearby SSSIs, taking account of recreational pressure and traffic-related air quality.

- Require provision of high-quality on-site green space and walking routes (including dog-walking areas) designed to absorb recreational use and thereby reduce pressure on designated meadows.

Clarify Flood-Risk and Drainage Strategy

- Tie SPN3 explicitly to a site-wide FRA and drainage strategy for all Oxford North phases, demonstrating long-term climate resilience and no increase in downstream flood risk, especially in relation to groundwater-dependent habitats.

Guarantee and Monitor Affordable Housing Delivery

- Re-state that later phases are expected to deliver up to 50% affordable housing in line with Policy H2, subject only to independently reviewed viability evidence.

- Require that viability assessments be made publicly available (subject to legitimate confidentiality) and include review-mechanism clauses so that uplift in values can trigger additional affordable housing or contributions.

Secure Infrastructure and Transport Mitigation

- Cross-reference the Infrastructure Delivery Plan and Northern Edge of Oxford AoF to specify key infrastructure to be funded from remaining phases, including school capacity, health provision, active-travel links and public-transport enhancements to Oxford city centre and Oxford Parkway.

- Require transport assessments for each major phase to assess cumulative impacts on A34/A40/A44 and local junctions and to secure proportionate mitigation and mode-shift measures.

Improve Design Guidance and Community Involvement

- Link SPN3 more explicitly to the High Buildings TAN and any site-specific design codes, including indicative height/massing ranges and design principles for edges adjoining Wolvercote Conservation Area and nearby neighbourhoods.

- Encourage structured community engagement (including with neighbourhood forums) on major buildings and public spaces to ensure that future phases better reflect local character and aspirations.

Review in Light of Strategic Plan Updates

- Acknowledge in the supporting text that the Oxford North allocation will be kept under review as the Local Plan is updated to address previous Inspectorate findings on housing need and the Duty to Cooperate, ensuring that SPN3 remains consistent with a sound strategic framework.

These changes would retain Oxford North's role as a key mixed-use site supporting the knowledge economy while providing greater assurance that environmental safeguards, infrastructure, affordable housing and strategic planning requirements are properly addressed.

END OF RESPONSE