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Employment Sites

Oxford Local Plan 2040

**BACKGROUND
PAPER 6c**

Employment Background Paper: 6c

Employment Sites

SA Objective 12: *To achieve sustainable inclusive economic growth, including the development and expansion of a diverse and knowledge-based economy and the culture/leisure/ visitor sector*

SEA theme: *Population, Material Assets*

1. Introduction

1.1 This background paper includes a discussion about how the categories of employment sites were derived and it provides an explanation of how the employment strategy considers the loss of employment floorspace on each of the different employment site categories.

1.2 It also includes a discussion about the interface of Policy E1 with the Plan's aim of providing as much housing as possible within the city.

2. Policy Framework

2.1 Employment Background Papers 6a and 6b include a detailed review of the policy framework. This background paper does not repeat the detailed policy review undertaken previously but instead supplements it with new material produced since those papers were published.

National Planning Policy Framework (December 2023)

2.2 In December 2023 a revised National Planning Policy Framework (NPPF) was published. Paragraphs 85-89 now relate to *Building a strong competitive economy*. While the paragraph numbers have changed, only very minor wording changes have taken place.

OxLEP Strategic Economic Plan (December 2023)

2.3 In December 2023, the Oxfordshire Local Enterprise Partnership (OxLEP) published a new Strategic Economic Plan (SEP) for the county. The SEP sets out four objectives to meet the Plan's ambition, which itself is consistent with the Future Oxfordshire Partnership's Strategic Vision. The four key objectives are as follows:

- Enable Oxfordshire's businesses to thrive and encourage pervasive innovation;
- Widen access to current opportunities and equip people and places as jobs change over the next decade;
- Secure resilient infrastructure for planned growth, consistent with Oxfordshire's commitment to net zero carbon by 2050; and

- Ensure that Oxfordshire’s places are sustainable and inclusive, and that local communities flourish.

2.4 These objectives are then shaped through four cross-cutting themes:

- Recognising our assets and using them well;
- Supporting innovation across Oxfordshire;
- Advancing Oxfordshire globally; and
- Strengthening our communities locally.

Regulation 19 Consultation Responses

3.1 Several respondents made some quite technical and detailed comments on some certain aspects of draft Policy E1. A summary of some of the key points made in the representations is set out below:

3.2 One respondent questioned how deliverable and effective the wording (in draft Policy E1) is in relation to delivering homes on employment sites. The respondent noted that draft Policy E1 is hailed as flexible however only 5 homes have been delivered to date (according to previous background papers from the City Council). The respondent considered that there is not enough flexibility in the policy to make it sufficiently effective to respond to changes in market conditions.

3.3 One respondent questioned the realistic potential for Category 1 and 2 employment sites to be re-used/ re-developed (even in part) for residential purposes given the restrictive criteria requiring these sites to be retained (either in terms of floorspace or jobs) for employment uses.

3.4 One respondent considered that the criteria to assess proposals for residential development on employment sites are all applied equally across all categories of employment sites. They considered this to be inconsistent with the plan’s intentions to provide more flexibility for Category 3 sites. Several respondents considered that the criteria were too strict when compared to delivering residential development on greenfield sites.

3.5 One respondent considered that, the plan provides little additional support (other than draft Policy E1) to help deliver residential development on the city’s network of employment sites. The respondent considered that a list of all the Category 3 employment sites should be made available and an employment land release strategy should be undertaken rather than relying on the market to deliver the release of employment land to residential uses.

3.6 One respondent considered that there was no clear evidence of residential capacity on Category 1 and 2 employment sites. Several respondents questioned why employment sites were rejected for residential development in the HELAA. One respondent commented that a number of Category 1 and 2 sites had been rejected for residential development in the HELAA on the basis of landowner intentions and therefore a lack of availability.

3.7 One respondent expressed that the HELAA had considered Category 1 and 2 employment sites as a “policy constraint” despite draft Policy E1 indicating a possibility of re-development / intensification to include residential use in the future. The respondent was concerned the impact that this inconsistency had on the decision-making process within the HELAA. They considered that the inconsistency between the Policy and the HELAA should be addressed.

3.8 One respondent set out that the HELAA states that all employment sites with the potential to deliver housing have been included in the assessment, however there is no published evidence that Category 3 sites have been assessed as the Interim ELNA only looks at Category 1 and Category 2 sites.

3.9 One respondent expressed concerns that the lack of effectiveness of Policy E1 in delivering residential development exacerbate the city’s unmet housing need.

3.10 One respondent considered that Policy E1 was not consistent with National Policy, specifically paragraph 127 of the NPPF (December, 2023) which states:

Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites...”

3.11 This respondent considered that Oxford is an area of high housing demand. They recognised that the plan’s strategy outlines a desire to take a positive approach as advocated by national policy, however they considered that Policy E1 has not gone far enough to ensure housing delivery on the city’s network of employment sites.

Oxford’s Employment Strategy

4.1 Policy E1 sets out Oxford’s employment strategy which seeks to focus employment-generating development towards the city’s network of existing Category 1 and 2 employment sites and to Oxford’s most inherently sustainable locations (i.e., the city and district centres). The Plan does not seek to allocate new strategic sites for employment-based uses. Background Paper 6a includes a detailed discussion and analysis of Oxford’s employment strategy, employment land needs and employment land supply.

Categories of Employment Sites

4.2 The Local Plan 2040 includes three categories of employment sites. The city’s network of Category 1 and 2 employment sites are well established in economic, employment and policy terms.

4.3 Oxford’s Category 1 employment sites are nationally and regionally important to the knowledge economy or are significant employers or sectors usually within Use Class E(g), and B2,

with B8 uses relating to their function. Many of these sites are large and often include a range of uses. Appendix 3.1 of the Plan provides a list of the city's Category 1 employment sites. They make a very strong contribution to the economic success of Oxford.

4.4 A review of Oxford's established network of Category 1 and 2 employment sites was undertaken internally by City Council Planning Officers in January and February 2022. These sites were reviewed against an agreed set of assessment criteria. Appendix 1 shows the site assessment form used to inform the categorisation of sites. The assessment was undertaken in two parts, an on-site assessment and a desktop assessment. It is worth noting that the site assessment used site characteristics to determine each site categorisation rating rather than taking account of specific occupiers.

4.5 Category 2 employment sites provide important local services and often include a mix of E(g) and B2 uses. Category 2 sites performed well against the assessment criteria and are recognised as having longer-term potential for continued employment use. Category 2 employment sites make a valuable employment contribution and often provide important supporting infrastructure for the larger employment uses in the city. Category 2 employment sites are listed at Appendix 3.2 of the Plan. Both Category 1 and 2 employment sites are mapped on the Policies Map.

4.6 Category 3 employment sites mainly comprise of smaller employment sites, including those that are poorly located or sites that do not perform such an important economic function as Category 1 or 2 sites. Category 3 employment sites are not listed in the Plan and do not appear on the Policies Map. These sites were assessed for their suitability for employment uses as part of the previous local plan. At the outset of plan preparation, the Category 3 employment sites were reviewed as part of the Local Plan 2040 preparation process to ensure that the sites were still appropriately categorised. A further review was undertaken by City Council Planning Officers in April 2023. Following this review, it was decided that a number of sites should be re-visited and re-assessed to make sure that the employment site categories assigned to them remained correct. The site assessment form at Appendix 1 was used for the assessment in order that a consistent approach was taken to the site assessments.

Loss of Employment Floorspace

4.7 Policy E1 makes provisions for how applications for the loss of employment floorspace will be assessed on each of the different categories of employment sites. Employment floorspace on each category of employment sites is treated differently. Category 1 and 2 employment sites have stronger criteria that afford them more protection than Category 3 sites, which can be lost to other uses in their entirety. Category 1 and 2 sites are given a higher level of protection because of the importance of these sites to the economy.

4.8 Policy E1 seeks to protect employment uses on Category 1 employment sites by not allowing a net loss of employment floorspace at these sites. The policy sets out that where a net

loss of employment floorspace is proposed, it needs to be fully justified and applicants must demonstrate that the site will remain fully operational for its employment use. The policy will only accept a net loss of floorspace if the number of jobs relating to employment generating uses at the site are retained. In relation to Category 2 employment sites, Policy E1 allows a net loss of floorspace providing the number of jobs in employment-related uses is retained. Given the city's employment strategy does not allocate new strategic employment sites, but rather seeks to intensify and modernise the existing employment site network, proposals for residential development could be delivered alongside proposals for intensification and/ or modernisation of employment floorspace as long as the policy criteria relating to the loss of floorspace were met.

4.9 As Category 3 employment sites are those sites that scored poorly in terms of their size, location, quality of features or a combination of these factors, when assessed against an agreed set of assessment criteria, it was considered that these sites could be lost to other uses under Policy E1. Given Oxford's long-standing housing issues, Policy E1 actively supports the complete loss of Category 3 sites to housing. In fact, Policy E1 includes a set of criteria, specifically for the assessment development proposals involving the loss of floorspace on employment sites to residential uses.

Interface with the Housing Strategy

4.10 The Plan sets out that the overall priority use for new sites is to deliver homes that meet housing needs (including some on employment sites), whilst also ensuring that the infrastructure, employment, education, and health needs for the city are met¹. Given Oxford's long-standing housing issues it is important that as much housing as possible is delivered in the city. Oxford's Innovation Engine (2023) Report² considers that:

Concerns relating to housing numbers, and constraints on new housing were identified in 2013, with knock-on effects for accommodation costs and the relative cost of housing when compared to salaries. The housing market continues to be a challenge with consequences for talent attraction, acquisition and retention.

4.11 The high costs associated with the Oxfordshire housing market continue to act as a barrier to economic growth. It is therefore important that the City Council seeks to maximise opportunities for housing delivery within the city. Background Paper BGP1 discusses Oxford's housing need and sets out the rationale for setting a capacity-based housing target. Paragraph 7.4 sets out that:

In Oxford, successive plans have set a housing requirement less than the identified need because of capacity constraint, and this has been justified through local plan examinations. An interim Housing and Economic Land Availability Assessment (HELAA) was undertaken to inform the Preferred Options consultation that took place in October/

¹ Paragraph 1.7, Oxford Local Plan 2040 <https://www.oxford.gov.uk/local-plan/oxford-local-plan-2040/9>

² <https://www.advancedoxford.com/innovation-engine/>

November 2022. The updated HELAA reflects the proposed policies of the Plan. This identified capacity in the city for 9,612 homes to 2040 (481 per annum). Background Paper 15 explains the site selection process and capacity calculation methodology.

4.12 Policy E1 therefore includes criteria to assess proposals for residential development on all categories of employment sites. The criteria aim to ensure that residential development that comes forward on any category of employment site will deliver well-designed and well-located residential development that creates a pleasant environment and sense of place. It is also to ensure that any residential development that comes forward does not prejudice the continuing operation of successful and/ or locally useful or high employment businesses and business sites (e.g., those existing businesses on Category 1 and 2 employment sites). This is because the Plan acknowledges the great importance of the contribution that Category 1 and 2 sites make to the economy. The Plan maintains support for a strong economy and recognises the wider societal benefits that this can bring. Background Paper 6b discusses the inclusive economy.

4.13 While Policy E1 sets out criteria for how the loss of employment floorspace should be assessed on the different categories of employment sites, it is only on Category 3 employment sites where their complete loss to other uses is allowed. The Plan therefore allows for the complete loss of Category 3 employment sites to other uses while supporting proposals for housing on these sites.

4.14 The City Council's Housing and Employment Land Availability Assessment (HELAA) looked at a range of sites from a variety of sources. Not all of the sites assessed as having either residential or employment potential in the HELAA require a site allocation policy. Some sites may not be large enough and other sites can come forward for development without a specific allocation policy. In this instance, development proposals would be assessed against relevant policies in the Plan³. Appendix 2 to this Background Paper sets out all of the employment sites that were assessed as part of the HELAA. The evidence base is robust and soundly based whilst the proposed policy framework is a proportionate and sound response to the evidence.

Housing on Category 1 employment sites

4.15 Appendix 3.1 of the Plan provides a list of all the Category 1 employment sites. Some sites were considered to have neither potential for housing nor economic development because they are well-established employers or innovation centres and did not have redevelopment potential within the plan period (e.g., Oxford University Press, Walton Street and Oxford Centre for Innovation at Macclesfield House). Whereas others were not allocated because, although they were assessed as having economic potential, a site allocation was not required to bring the sites forward due to other policy considerations such as their location within an Area of Focus.

³ Paragraph 6.3 Background Paper 15a – Site Assessment Process
<https://www.oxford.gov.uk/downloads/download/491/downloads-for-oxford-local-plan-2040-submission-draft-background-papers>

4.16 Any residential development that comes forward on non-allocated Category 1 employment sites would be considered as windfall development.

4.17 Nine Category 1 employment sites benefit from a site allocation following their assessment in the HELAA. Broadly speaking the allocated Category 1 employment sites can be broken down into three types:

- Employment and residential site allocation (includes a housing number)
- Employment allocation with flexibility for residential under Policy E1
- Employment allocation with flexibility for residential including employer-linked affordable housing⁴

4.18 Table 1 provides a summary of the type of development or allocation supported on each of the Category 1 employment sites for which there is a site allocation policy.

Site Reference/ Name	Type of Development or Allocation
SPN1 Northern Gateway	Employment and residential site allocation (includes housing numbers)
SPS1 ARC Oxford (formerly Oxford Business Park)	Employment allocation with flexibility for residential under Policy E1
SPS4 MINI Plant Oxford	Employment allocation with flexibility for residential under Policy E1
SPS5 Oxford Science Park	Employment allocation with flexibility for residential under Policy E1
SPS7 Unipart	Employment allocation with flexibility for residential under Policy E1
SPE6 Churchill Hospital	Employment allocation with flexibility for residential under Policy E1 and flexibility for Employer-linked Affordable Housing under Policy H5
SPE7 Nuffield Orthopaedic Centre	Employment allocation with flexibility for residential under Policy E1 and flexibility for Employer-linked Affordable Housing under Policy H5
SPE8 Warneford Hospital	Employment allocation with flexibility for residential under Policy E1 and flexibility for

⁴ Policy H5 sets out a list of sites where employer-lined affordable housing has been identified as appropriate.

	Employer-linked Affordable Housing under Policy H5
SPE20 John Radcliffe Hospital	Employment allocation with flexibility for residential under Policy E1 and flexibility for Employer-linked Affordable Housing under Policy H5

Table 1: Category 1 employment sites: Site allocations and proposed uses (housing/ economic)

4.19 Policies SPE6 Churchill Hospital, SPE7 Nuffield Orthopaedic Centre, SPE8 Warneford Hospital and SPE20 John Radcliffe Hospital are all Category 1 sites described as “hospital research sites” in Appendix 3.1 of the Plan. As operational hospital sites, the City Council does not consider it to be appropriate to include a minimum housing number within these site allocation policies. This is because although residential development is important both to the city (and to the hospital trusts themselves in relation to providing accommodation (e.g., as employer-linked affordable housing in line with Policy H5) for hospital workers, it is also important that hospital sites have the flexibility to be able to prioritise their own building programmes and not be tied to local authority housing targets. This is so that the hospitals can continue to operate effectively and provide appropriate facilities to enable the treatment of their patients, which is essential infrastructure. It is worth noting that the approach to not include housing numbers on hospital sites was previously accepted by the Local Plan 2036 Inspector in his Report⁵ as sound.

4.20 Policies SPS1 ARC Oxford (formerly Oxford Business Park) and SPS5 Oxford Science Park are described as “Science and Business Parks” in Appendix 3.1 of the Oxford Local Plan 2040. Both sites are described as having potential for economic uses in the HELAA as they are available, suitable and viable.

4.21 Policies SPS4 MINI Plant Oxford and SPS7 Unipart are described as “major manufacturing/ research sites” in Appendix 3.1 of the plan. Both sites are described as having potential for economic uses in the HELAA as they are available, suitable and viable. These sites have scope for redevelopment during the Plan period. MINI Plant Oxford recently announced plans for a £600million investment with a commitment that Oxford will be the site to produce two completely electric Mini’s by 2030. There is scope for the redevelopment of the Unipart site later in the plan period.

4.22 As part of the HELAA, the development potential of the city's key employment sites was assessed for both housing and economic uses using the three standard tests of suitability, availability and achievability.

4.23 To ensure that our understanding of landowner intentions was up to date, landowners were contacted as part of the HELAA and ELNA studies. Where landowners of employment sites stated that their intentions were to deliver economic uses at their sites (with no current plans to

⁵ <https://www.oxford.gov.uk/downloads/download/481/downloads-for-oxford-local-plan-2036-inspectors-report>

deliver residential uses) this has been reflected in the HELAA availability assessment. For those sites where landowners expressed interest in delivering economic uses at their site, rather than being considered as having no residential potential, these sites were assessed as being not available for residential and their suitability for residential was untested through the HELAA. This is a reasonable and proportionate assumption as although these sites are unlikely to be made available for residential development at the current time, if landowner circumstances do change then the local plan policies would allow for residential development to come forward. As such, the HELAA conclusions do not limit that in any way.

4.24 Some employment floorspace (e.g., R&D and laboratory space) commands a premium rent, compared to standard office space, even when it is delivered outside the core city centre⁶. The continued constrained supply of Grade A office and laboratory space was recognised by Savills in 2022 as being severely limited in the city centre and at key ring road locations. Savills also considered that the development pipeline for 2022-2023 was also low². This supply/demand imbalance has resulted in premium rents for R&D and laboratory space both in and outside Oxford's core city centre market. Background Paper 6a – Oxford's Economy sets out that there is a likely to be a surplus supply of office/ R&D floorspace delivered in the plan period, however in the short-term there is high unmet demand for R&D and laboratory uses which is driving rents for these uses upwards.

4.25 It is important to acknowledge that this has not always been the case. Following the introduction of Permitted Development Rights (PDR) to allow for the change of use from office to residential in 2013, an Article 4 Direction was introduced in 2015 to protect forty employment sites across the city including Oxford Business Park (Now ARC Oxford), Oxford Science Park and BMW (now MINI Plant Oxford) from being lost to residential through PDR.

4.26 The Interim Employment Land Needs Assessment (ELNA) Report⁷ (2022) produced by Lichfields provides information about the amount of employment floorspace lost through Prior Approvals between 2013 and 2021. This report sets out that a total of sixteen Prior Approvals from office to residential were implemented during this period resulting in the loss of 22,700sqm of office space. This was equivalent to 6% of the total office stock in Oxford city in 2013 (i.e., at the point the PDRs were introduced). It is worth noting that the largest loss of office floorspace was in relation to the Former Nielson House on London Road, which resulted in a net loss of – 9,675sqm of office floorspace. This site was a large Category 2 employment site (5.05ha).

4.27 The Interim ELNA Report (2022) also sets out that with the introduction of the changes to the Use Classes Order which came into effect in 2020 (i.e., the introduction of Use Class E), this means that the office to residential PDR will be phased out, and has been replaced with a new

⁶ Spotlight Oxford Offices and Laboratories, Savills, March 2022

https://www.savills.co.uk/research_articles/229130/326388-0

⁷ <https://www.oxford.gov.uk/downloads/download/492/downloads-for-oxford-local-plan-2040-submission-draft-evidence-base-and-supporting-studies>

Class MA business and commercial to residential PDR which is subject to different conditions, limitations and restrictions.

4.28 As can be seen from the above, demand for different land uses is not static. Paragraph 86(d) of the NPPF (December 2023) is clear that planning policies should be flexible to enough to accommodate... a rapid response to changes in economic circumstances. Policy E1 therefore provides a flexible and permissive approach to allow landowners/ developers to deliver other uses including residential development on Category 1 employment sites should economic circumstances change during the plan period. It is important to acknowledge that the Local Plan runs to 2040 and as such to recognise that the supply/ demand picture for employment land could change over this timeframe. It is important that policies for employment land provide flexibility for the diversification of uses over the plan period, while at the same time protecting the core employment use of the city’s most important employment sites.

4.29 The City Council does not consider it appropriate to attribute a housing number to those allocated Category 1 employment sites where the landowner has specified that they are not currently available for residential development. As set out above, Policy E1 provides a flexible strategy designed to be able accommodate rapid changes in economic circumstances. As such, should an element of residential development come forward on Category 1 employment sites during the plan period, this would be captured as a windfall.

Housing on Category 2 Employment Sites

4.30 Appendix 3.2 of the Plan lists the city’s Category 2 employment sites. Appendix 2.2 of this Background Paper lists those Category 2 sites that were assessed in the HELAA. Table 2 shows a summary of how the Category 2 employment sites are treated in the plan.

The other Category 2 employment sites can be broken down into three broad types.

- Category 2 sites located in the in city and district centres;
- Larger Category 2 sites (i.e., those assessed in the HELAA)
- All other Category 2 sites (i.e., smaller sites outside the city and district centres).

4.31 As set out above, the city’s employment strategy seeks to restrict the location of new employment-generating development to the city’s Category 1 and 2 employment sites and the city and district centres. Policy E1 only allows a net loss of floorspace on Category 2 employment sites providing the number of jobs in employment-related uses is retained.

Site Reference/ Name	Type of Development or Allocation
SPCW7 Osney Mead	Employment and residential site allocation (includes housing number)
SPS12 Templars Square	Mixed-use development (includes housing number)

SPCW6 Nuffield Sites (Island Site)	Mixed-use development (includes housing number)
Category 2 sites in city and district centres	Employment and flexibility for residential
Category 2 larger sites (over 0.25ha - assessed in HELAA)	Employment and flexibility for residential
Category 2 – all other sites	Employment and flexibility for residential

Table 2: Relationship between Category 2 employment sites and residential uses

4.32 The three Category 2 employment sites that benefit from a site allocation have all been assessed in the HELAA as part of the housing site allocations process. These site allocations all include a housing number.

4.33 In the city and district centres, there are a wide range of uses which Category 2 employment sites can change to without the need for planning permission. This is because of the permitted development rights associated with changes of use of buildings within Use Class E. Where planning permission is required for changes of use in the city and district centres, there is a wide range of acceptable non-residential uses (including intensification for further employment uses), which are supported given the highly sustainable and accessible nature of these locations.

4.34 On the larger Category 2 sites (i.e., those over 0.25ha and assessed in the HELAA), Policy E1 allows for the intensification of employment uses and the delivery of housing. In fact, the policy would allow for the provision of residential development alongside employment development providing the number of jobs in employment-related uses was retained. On the smaller Category 2 sites, there is potential for the delivery of residential development in line with Policy E1.

4.35 It is appropriate that Category 2 employment sites that benefit from site allocation policies and have been assessed as having residential potential in the HELAA should include a housing number. However, for the remaining Category 2 employment sites, it is not appropriate that a housing number be attributed to them. This is because any residential development that might come forward on Category 2 employment sites would be treated as windfall development. As such the plan already has a mechanism for capturing residential developments either on small sites not assessed in the HELAA, or on sites which have been assessed in the HELAA as not currently having residential potential.

Housing on Category 3 Employment Sites

4.36 Category 3 employment sites are not featured on the Policies Map. Some Category 3 employment sites were assessed in the HELAA. Appendix 2.3 provides a list of those sites. The HELAA assessed employment sites from a variety of sources including the OLP2036 Evidence Base, which included employment sites protected by the Office to Residential Article 4 Direction.

4.37 All Category 3 employment sites were originally assessed and scored using the Pro Forma at Appendix 1. The assessment was first undertaken as part of the production process for the adopted Local Plan 2036. This assessment was used as a basis for the Local Plan 2040 assessment process.

4.38 The Category 3 employment sites were reviewed by City Council Planning Officers in April 2023 to ensure that the sites were still appropriately categorised. Following this review, it was decided that a number of sites should be re-visited and reviewed to ensure that the employment categories assigned to them remained correct.

4.39 The Plan sets out that Category 3 employment sites are sites that scored poorly in terms of their size, location or quality of features or a combination of these factors, when assessed against an agreed set of assessment criteria⁸. As these sites are poorly performing, their complete loss to other uses is allowed under Policy E1. Given Oxford's long-standing housing issues, Policy E1 specifically supports proposals for residential development on Category 3 sites.

4.40 Two former Category 3 employment sites also benefit from site allocations. These sites were identified through the HELAA process. For instance, site allocation SPS18 – 474 Cowley Road (Former Powell's Timber Yard) was identified through the OLP2036 evidence base and a planning application. SPE21 Rectory Centre was identified through the Call for Sites process in 2022. These two Category 3 employment sites have been found through a process specifically designed to identify sites for housing development. As these sites have residential potential for more than ten dwellings and the assessment in the HELAA shows that they are available, suitable and achievable, they have been allocated in the Plan.

4.41 The Council considers it is inappropriate to attribute a global housing number to Category 3 employment sites. There are a number of reasons for this:

- Although the Plan specifically supports proposals for residential development on Category 3 sites, landowners may wish to redevelop their site for continued employment uses, which Policy E1 allows for providing certain criteria are met where the location of the site does not align with the plan's employment strategy (i.e., outside the city and district centres a sequential test must be undertaken for proposals to modernise and intensify Category 3 employment sites).
- Landowners may wish to change the use of a Category 3 employment site to another use (other than employment or residential). If this is the case, then an application would be assessed on its merits against Policy E1 and other relevant policies in the plan.
- Most Category 3 employment sites do not need a site allocation. As such should these sites come forward for redevelopment for housing, they would be treated as windfall sites.

⁸ See Appendix 1 for Employment Site Assessment Pro-Forma

4.42 It is worth noting that since the start of the plan period, 70 new homes have been granted permission/ prior approval on Category 3 employment sites.

Conclusions

5.1 This Background Paper demonstrates there is a clear justification for the positive and permissive approach taken for assessing proposals for residential development on all categories of employment sites. It shows that there are proposed site allocations for all categories of employment sites, some of which have been attributed housing numbers. Where housing numbers are included on site allocations for the various employment sites, these have been assessed through an appropriate process (i.e., the HELAA). This Background Paper also shows how the evidence indicates that not all site allocations for employment development needs to include housing numbers.

5.2 All allocated employment sites have been assessed in the HELAA. The Council has taken forward a series of employment site allocations and employment sites that enable opportunities for residential development to be delivered on those sites. Where employment sites have not been caught by the HELAA process, they have been reviewed as part of the preparation of the Plan. In combination with site allocations, this forms an appropriate and proportionate methodology to enable the potential delivery of housing on the most suitable employment sites.

5.3 The Background Paper shows that it is inappropriate to attribute a global housing number to residential development that may come forward on employment sites of all categories. This is because if residential development was delivered on sites assessed in the HELAA, this would be considered to be windfall development. Similarly, any residential development that came forward on sites not assessed in the HELAA would also be picked up in the plan's windfall allowance.

5.4 Having regard to the City's context and constraints, Oxford City Council is maximising the opportunities available to facilitate housing within the city's boundaries, including on economically successful employment sites. It is necessary to balance planning for new housing against ensuring the economy of Oxford continues to be strong, robust and inclusive. Indeed, the delivery of new homes should support the economic success of the City, not seek to undermine it. The Plan is aligned to the current position of the market, and it would be inappropriate to force landowners/ operators away from employment uses to housing. However, given the time horizon of the Local Plan 2040, it is important that it includes policies that will operate flexibly to respond to changes in market conditions, should these occur during the plan period.

Appendix 1 ELA Site Assessment Form

ELA site assessment form – (1) on-site portion	
Site name	
Site address	

Accessibility	
Local road access	
1	Poor: difficult/narrow road access, via residential roads, difficult site junction, congested roads or restricted heights/weights
2	Fair: some access issues as outlined above
3	Good: generally good access with few issues for HGVs and limited congestion
4	Very good: via free-moving good roads, avoiding residential areas and difficult junctions
Notes:	
Walking and cycling	
1	Poor: no existing footpaths or cycle paths to the site
2	Fair: some footpath or cycle paths although limited provision/not continuous
3	Good: reasonable paths available but some limitations such as poor quality surface/lighting/crossings etc.
4	Very good: good and attractive footpath and cycle links from residential areas
Notes:	

General location and neighbours	
General location; proximity to amenities and facilities (and labour)	
1	Poor: remote site, no amenities or facilities easily accessible
2	Fair: limited facilities available although access may be more difficult (1-1.5 Km)
3	Good: good access to some facilities (within 0.5 -1 Km)
4	Very good: easy access to a range of amenities and facilities (within 0.5 Km)
Notes:	
Proximity to incompatible uses	
1	Poor: adjoining residential or other sensitive uses on one or more boundary
2	Fair: some residential or other sensitive uses as near neighbours
3	Good: generally similar neighbouring uses; incompatible adjoining land uses are limited
4	Very good: within larger employment area; no incompatible adjoining land uses
Notes:	

Site characteristics	
Topography; size; profile	
1	Poor: sloping/uneven site; under 1 ha. size; irregular/narrow shape; difficult access point
2	Fair: some of the above issues
3	Good: some of the advantages below
4	Very good: generally level site; regular shape; over 5 ha. in size; good access point
Notes:	

Quality of local environment					
Age of existing premises (tick as appropriate)					
Pre- 1970		1970-1990		Post 1990	
Condition of existing premises					
1	Poor: buildings and external areas are of very poor quality and condition / very restricted circulation and servicing facilities				
2	Fair: generally buildings and external areas appear adequate, although some aspects may be poor				
3	Good: generally buildings and external areas are of good standard				
4	Very good: buildings and external areas are of a very good quality and condition providing a good range of building type, size and tenure / good circulation and servicing facilities				
Notes:					
General attractiveness of the location					
1	Poor: surrounding environment is of poor quality; low profile/visibility; poor/run-down/unattractive appearance; attracts lower end users				
2	Fair: some of the above aspects are more attractive				
3	Good: most aspects are attractive though some users would likely look for a better standard				
4	Very good: quality of surrounding environment will likely be a positive factor to attracting occupiers; high profile/visibility; high quality appearance, environment and quality of occupiers				
Notes:					
Environmental quality					
1	Poor: the site is substantially exposed to noise, dust and/or smell which significantly affects the quality of the immediate environment				
2	Fair: the site is exposed to some noise, dust or smell which somewhat affects the quality of the environment at certain periods of day				
3	Good: occasionally, the site is exposed to some noise, dust or smell which can affect the amenity of the immediate environment				
4	Very good: the site does not appear to be exposed to unreasonable levels of noise, smell, dust or other amenity factors				
Notes:					

Green and blue infrastructure features – this could include areas of green space, trees and shrubs, ponds, canals/rivers, green walls or roofs.	
1	Poor – little or no green or blue infrastructure features on the site. If located on site, relatively disparate and/or of low quality, the area is entirely or predominantly artificial in surface cover.
2	Fair – there are some areas of green or blue infrastructure features on the site, or features which seem of average quality.
3	Good – green or blue infrastructure covers a fairly large area of the site, or forms some good connections to neighbouring areas, or includes features which seem of a good quality.
4	Very good - green or blue infrastructure makes up extensive parts of the site, or forms strong connections to neighbouring areas, or includes features which seem of a very high/exceptional quality.
Notes: (pictures would also be useful) See below	

Market conditions	
Vacancy levels	
1	Poor: over 25% site/premises vacant
2	Fair: 15-25% site/premises vacant
3	Good: 10-15% site/premises vacant
4	Very good: under 10% of site/premises vacant
Notes:	

Sub-total score of on-site assessment:

ELA site assessment form – (2) desktop portion

Site name	
Site address	
Site area (hectares)	
Site allocation / policy designations	
Current use class(es)	
% of land still undeveloped	
Greenfield / Brownfield (% split)	

Accessibility

Access to Strategic Road Network

1	Poor: over 5 Km from junction onto ring road, and/or through constrained/local roads, and/or through town centre or residential areas etc.
2	Fair: 3-5 Km from junction onto ring road, and/or through constrained/local roads
3	Good: 1-3 Km from junction onto ring road, via relatively unconstrained roads
4	Very good: within 1 Km of junction onto ring road, via good unconstrained roads

Notes:

Public transport (including rail) access

1	Poor: remote site, poor infrequent public transport access, 1 bus service per hour or less
2	Fair: more than 800m from public transport facilities / 2 buses per hour
3	Good: 400-800m from public transport facilities / 4 buses per hour
4	Very good: served by a range of frequent public transport options linking to residential areas and services

Notes:

Site characteristics

Flooding; contamination

1	Poor: functional flood plain (Flood Zone 3b); likely to be significantly contaminated requiring substantial ground preparation and remediation
2	Fair: high probability of flooding on the site (Flood Zone 3a); likely to be contaminated requiring some ground preparation and remediation
3	Good: medium probability of flooding (Flood Zone 2); likely to be only limited potential for contamination requiring minimal ground preparation and remediation works
4	Very good: low probability of flooding on site (Flood Zone 1); contamination unlikely, no significant ground preparation works required

Notes:

Market conditions	
Market perception	
1	Poor: low demand, difficult to attract occupiers even with heavy marketing
2	Fair: requires strong marketing/incentives to attract new occupiers
3	Good: good demand, units don't remain unoccupied for long
4	Very good: viewed as attractive by agents/occupiers; strong demand, units rarely available
Notes:	
Marketing evidence: what evidence is there that the site has been actively marketed?	
None	

Ownership and potential for development	
Ownership factors	
1	Poor: unknown/many small separate ownerships/no overall management
2	Fair: relatively complex ownerships with some diverse aspirations
3	Good: single or few ownerships with good co-ordination/management
4	Very good: all in single ownership with active management and on-going investment
Notes:	
Availability for development	
1	Poor: constraints on development or owner aspirations for other uses, history of non take-up, unlikely to be available within 5 years or more
2	Fair: no active discussions but no specific constraints to development either
3	Good: landowner actively pursuing / discussing future investment
4	Very good: land available immediately for development or occupation with recent planning permission
Notes:	
What development would the landowner/developer consider/propose (housing, employment, other commercial, mixed use or unknown)?	

Wider economic factors	
Deprivation and Regeneration Areas	
1	Poor: site within the most affluent neighbourhoods (super output area is in top quartile of least deprived (75% plus)
2	Fair: site within a neighbourhood ranked as average to affluent (super output area is in the 50% to 75% least deprived quartile)

3	Good: site within a neighbourhood ranked as average to deprived (super output is in the 50% to 25% quartile)
4	Very good: site is within a neighbourhood ranked as deprived (super output area is in the 25% or below quartile) and within a City Council Regeneration Area

Notes:

Economic activity

1	Poor: site is located in a ward of high economic activity (76% plus economically active in employment)
2	Fair: site is located in a ward of good economic activity (70-75% economically active in employment)
3	Good: site is located in a ward of moderate economic activity (65-70% economically active in employment)
4	Very good: The site is located in a ward of low economic activity (below 65% economically active in employment)

Economic development

1	Poor: site does not have ability to deliver any regional / local economic development objectives
2	Fair: site has limited ability to deliver regional or local economic development objectives
3	Good: site has good ability to deliver some regional or local economic development objectives
4	Very good: site has excellent ability to deliver several significant regional / local objectives

Notes:

Sub-total score of desktop assessment:

GRAND TOTAL SCORE OF ON-SITE ASSESSMENT AND DESKTOP ASSESSMENT:

Notes:

Appendix 2 Employment sites assessed in the HELAA

Appendix 2.1 Category 1 Sites

HELAA Ref	Site Name	Potential for Housing Accept/Reject	Potential for economic use Accept/Reject	Total site area	How site identified	Policy Considerations	Physical considerations	Suitability	Availability	Achievability	Justification
1	Northern Gateway	A	A	45.48	Development Plan Document (Northern Gateway Area Action Plan)	Adjacent to parts of Core GI network (Canal Side Meadow LWS and Linkside Lake OCWS) Partially within Wolvercote CA Category 1 Employment Site	Within 150m of SSSI and SAC (Port Meadow)	Northern Gateway AAP sets out policies for employment-led development and up to 500 new homes. Hybrid permission for Oxford North development: 18/02065/OUTFUL (for 480 homes and up to 87,300 m2 employment), also 21/01053/RES and 22/00081/RES and 22/00675/RES (317 dwellings). Site also includes Pear Tree Farm and Red Barn Farm parcels. Site is suitable	Site is under construction (2023) Site is available	Development has commenced on part site Site is viable	Adopted AAP. Planning permission and development has commenced. Site expected to be developed within the Local Plan time period.
12	Churchill Hospital	A	A	22.74	OLP2036 SP19	Adjacent to Core GI network (Lye Valley SSSI and Oxford City Wildlife Site(s) (OCWS) including Lye Valley and Cowley Marsh, Churchill Hospital Field and Boundary Brook corridor - Mileway Gardens) Category 1 Employment Site	Adjacent to SSSI (Lye Valley) Area with potential Peat Reserves in the north of site	Site allocation SP19 establishes site is suitable for further hospital related uses as well as linked uses and complimentary residential. Planning permission (19/01039/FUL) for key worker housing (19 units) completed (2022) on part of site Site is suitable for residential subject to not prejudicing operational use of hospital	The site has underused areas. Planning permission Development has completed on part of the site (Ambulance Resource Centre). Site is viable for part of site (Ambulance Resource Centre only) is complete (January 2022). Rest of site currently in use but likely to be developed within the plan period. Available as part of mixed use development. Site is available	Development has completed on part of the site (Ambulance Resource Centre). Site is viable	Adopted site allocation and confirmed landowner intention, including part of the site being completed (Jan 2022) within plan period. Further development expected within the Local Plan time period subject to operational uses of the hospital
27	John Radcliffe Hospital	A	A	27.75	OLP2036 SP41	Part of site within Old Headington CA Contains Listed Buildings Site located adjacent to Core GI (Eden Drive Allotments, Ingle Close Allotments & Headington Cemetery) and Supporting GI (Sandfield Road Park) Category 1 Employment Site	None identified	Site allocation SP41 establishes site is suitable for further hospital related uses, other uses with an operational link to the hospital and complimentary uses (including residential, employer linked affordable housing and student accommodation). Planning permission (19/01038/FUL) in August 2020 for key worker housing on part of the site (Ivy Lane flats). Site is suitable subject to not prejudicing operational use of hospital	Landowner interest in developing employer-linked affordable housing Various planning permissions indicate landowner intent to develop. Part of the site is under construction (2023) Site is available	Allocation accepted by LP2036 Inspector. Development has commenced for key worker housing. Site is viable	Adopted site allocation that has various planning permissions. Development has commenced for key worker housing. Site likely to be developed in phases as part of hospital restructuring within the Local Plan time period

42	Nuffield Orthopaedic Centre	R	A	8.38	OLP2036 SP20	Category 1 Employment Site	Within 200m of SSSI (Rock Edge)	Site allocation SP20 establishes site is suitable for healthcare facilities, medical research including staff and patient facilities and residential development including extra care accommodation and employer-linked affordable housing that supports the main use of the site. Site is suitable subject to not prejudicing operational use of hospital	Site is occupied by the Nuffield Orthopaedic Centre with scope for intensification of site. Landowner has indicated that their focus is on the JR site and at present they do not have any plans for development of the NOC within the plan period. Site is not available for residential	Allocation accepted by LP2036 Inspector Site is viable	Some scope for intensification of site but landowner focus is on other sites within the Trust so this site is not likely to be available during the plan period for residential development but could be some intensification of hospital uses.
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43	Old Road Campus	R	A	6.41	OLP2036 SP21	Adjacent to local nature designation Category 1 Employment Site	None identified	Site allocation establishes site is suitable for additional medical, teaching and research. Suitability for residential is untested. Site is suitable.	Various planning permissions granted for medical research and teaching development. Landowner update 2023 confirmed intend to retain for employment/research, no plans to deliver residential. Available for economic	Allocation accepted by LP2036 Inspector Site is viable	Adopted site allocation and confirmed landowner intention. Site expected to be developed within the Local Plan time period
62	University of Oxford Science Area and Keble Road Triangle	R	A	12.43	OLP2036 SP60	Adjacent to and part within Central (University & City) CA Within High Buildings Area Contains Listed Buildings Adjacent to Grade II listed Registered Park and Garden (University Parks) Category 1 Employment Site Part of site adjacent to GI network (Oxford City Wildlife Sites and Local Wildlife Sites and Outdoor Sports (University Parks).	Approx. 270m from New Marston SSSI	Site allocation SP60 establishes site is suitable for residential development, academic institutional uses and associated research. Site is suitable	Landowner, University of Oxford, confirmed intention (2023) to develop for academic and research uses only. No intention to develop for residential development. Site is available for economic uses, not available for residential use	Allocation accepted by LP2036 inspector. Site is viable	Site expected to be developed within the Local Plan time period for academic and research purposes, not landowner intention to develop for residential.
63	Warneford Hospital Site	A	A	8.78	OLP2036 SP22	Adjacent to part of Core GI network (Warneford Meadow and Orchard OCWS) Adjacent to Headington Hill CA Contains listed buildings Category 1 Employment Site	None identified	Site allocation SP22 establishes that site is suitable for healthcare related facilities primarily plus other uses including residential and student accommodation, academic research, B1 uses with a link, and education. Site is suitable subject to not prejudicing operational use of hospital	In existing use as a hospital which will remain on site in new hospital development. Some existing buildings will become surplus to requirements. Landowner intention to develop surplus areas (promoted at Local Plan call for sites). Site is part available (as a mixed use site)	Allocation accepted by LP2036 inspector. Site is viable	Adopted site allocation for residential including key worker housing and hospital and medical related B1a and B1b, and confirmed landowner intention. Site expected to be developed within the Local Plan time period
120	Unipart Site	R	A	30.63	OLP2036 SP7	Category 1 Employment Site (Unipart)	None identified	Site allocation SP7 establishes site is suitable for employment uses. Suitability for residential is untested. Potential access issues because site can only currently be accessed via security gate along Transport Way. Site is suitable	Scope for intensification of economic uses onsite (lots of surface parking), but no intention to develop residential Site is available (economic)	Allocation accepted by LP2036 Inspector Site is viable	Adopted site allocation (employment use only). Site expected to be developed within the Local Plan time period.
417	Royal Mail Depot Building (forms part of #587 Oxford Business Park)	R	R	2.064	OLP2036 Evidence Base	Adjacent to Temple Cowley CA Category 1 Employment Site Adjacent Listed Buildings	None identified	Falls within site 587 Oxford Business Park. Site allocation SP10 establishes that the wider site is suitable for B1 and B2 employment uses. Application approved July 2018 for change of use of 7000 Alec Issigonis Way (Former Royal Mail Building) to Mixed Use B1a/B1b and B8 (18/00813/FUL). Suitability for residential is untested. Suitable for employment	Recent redevelopment for change of use, no evidence of any intention for further redevelopment Not available	Recent planning application confirms viable. Site is viable	Site is suitable for employment but not available due to very recent change of use redevelopment.

448	Macclesfield House (Oxford Centre for Innovation) and Registry Office, Tidmarsh Lane	R	R	0.25	Falls within OLP2036 AOC1 West End	Entire site lies within Central (University & City) CA Historic Core Area City Centre Archaeological Area High Buildings Area Adjacent to historical assets including Oxford Castle Scheduled Monument and numerous listed buildings including Oxford Castle (Grade I) and Nuffield College (Grade II) Category 1 Employment Site (Oxford Centre for Innovation)	Approx. 40m from Castle Mill Stream.	In use as a Category 1 employment site, currently occupied by the Oxford Centre for Innovation offices. Suitability for residential is untested. Site is suitable for employment use	Landowner update 2023, confirmed intention to retain for employment use. Site is not available	Site is viable typology Site is viable	Site in employment use and no landowner intention to develop within plan period.
497	MINI Plant Oxford	R	A	69.9	OLP2036 SP8	Category 1 Employment site	None identified	Site is Category 1 employment site. Site allocation SP8 establishes site is suitable for B1, B2 and B8 uses. Suitability for residential is untested. Site is suitable for economic uses.	Occupied by Mini Plant, although additional employment land could be made available with reorganisation of existing uses. Landowner confirmed intention to retain employment uses on full site. Available for intensification of economic use.	Allocation accepted by LP2036 Inspector. Site is viable.	Adopted site allocation for intensification of economic use. Expected to be delivered within Plan period.
523	Oxford University Press, Walton Street	R	R	2.09	PO 2017	The entire site is located within the Jericho CA Listed buildings within site Historic Core Area Category 1 Employment Site	None identified	Site in Category 1 employment use as a major publishing site linked to the University/knowledge economy. Suitability for residential is untested. Suitable for economic use.	Site currently in use by OUP for employment, confirmed (2023) to retain in employment use. Not available.	Site is viable typology	Site in use for economic and no indication of intention to redevelop and no additional floor area available
579	Radcliffe Observatory Quarter (ROQ) Site	R	A	4.29	OLP2036 SP54	This site is located adjacent to the Central (University & City), Jericho, and Walton Manor CA Historic Core Area Listed buildings within and adjacent to site; adjacent to Jericho district centre Category 1 Employment Site	None identified	Site allocation SP54 establishes that site is suitable for academic institutional, student accommodation and residential development including employer-linked affordable housing. Site is suitable	The site is occupied and owned by the University of Oxford. Various University related developments have been implemented in accordance with The ROQ Master Plan. The landowner intention (2023) for academic/research/university-related uses on the remaining plots (not residential). Site not available for residential	Allocation accepted by LP2036 Inspector. Site is viable	Adopted site allocation. Site expected to be developed within the Local Plan time period in accordance with the University's masterplan (not residential uses)
587	ARC Oxford (formerly Oxford Business Park)	R	A	35.4	OLP2036 SP10	This site is located adjacent to Temple Cowley CA Listed building opposite (Nuffield Press, East Wing and attached former school house) Category 1 Employment Site	None identified	Site allocation SP10 establishes that site is suitable for B1 and B2 employment uses. ARC forms part of a key employment cluster, it is important that employment uses are retained and enhanced on this site to support the economy and economic growth. Suitability for residential is untested. Suitable for economic	The site is occupied and owned by the University of Oxford. Various University related developments have been implemented in accordance with The ROQ Master Plan. The landowner intention (2023) for academic/research/university-related uses on the remaining plots (not residential). Site not available for residential	Allocation accepted by LP2036 Inspector. Site is viable	Adopted site allocation. Site expected to be developed within the Local Plan time period

588	Oxford Science Park (whole site)	R	A	26.51	OLP2036 SP9	<p>Category 1 Employment Site</p> <p>Includes part of Core GI network (Littlemore Brook OCWS)</p> <p>Potential for Peat deposits on site (R6)</p>	<p>Flood Zone 2 (22%)</p> <p>Flood Zone 3a and 3b (7%)</p>	<p>Site allocation SP9 establishes that site is suitable for B1 employment uses. The Science Park forms part of a key employment cluster, it is important that employment uses are retained and enhanced on this site to support the economy and economic growth.</p> <p>Suitability for residential is untested.</p> <p>Suitable for economic</p>	<p>The site is occupied and owned by the University of Oxford. Various University related developments have been implemented in accordance with The ROQ Master Plan. The landowner intention (2023) for academic/research/university-related uses on the remaining plots (not residential).</p> <p>Site not available for residential</p>	<p>Allocation accepted by LP2036 Inspector. Site is viable</p>	<p>Adopted site allocation. Site expected to be developed within the Local Plan time period</p>
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Appendix 2.2 Category 2 Employment Sites

HELAA Ref	Site Name	Potential for Housing Accept/ Reject	Potential for economic use Accept/ Reject	Total site area	How site identified	Policy Considerations	Physical considerations	Suitability	Availability	Achievability	Justification
006b	Banbury Road University Sites - Parcel B (formerly part of 006 Banbury Road University Sites)	A	A	0.52	OLP2036 SP31 Planning Application	Victorian Suburb CA Part of site within High Buildings Area Part of the site is a Category 2 Employment site	None identified	Site allocation SP31 establishes site is suitable for academic uses, student accommodation and/or resi including employer-linked housing. Currently part of site is Cat 2 employment. Planning application (22/02849/FUL) (resolution to grant permission May 2023) for part of this parcel - seeks permission for 130 student rooms (52 C3 equivalent). Site is suitable	Planning application indicates landowner intention to develop. Site is available	Allocation accepted by LP2036 Inspector Site is viable	Adopted site allocation and confirmed landowner intention. Site expected to be developed within the Local Plan time period.
14	Templars Square Shopping Centre (formerly Cowley Centre, Between Towns Road (includes Templars Square))	A	A	3.86	OLP2036 SP3	Adjacent to Beauchamp Lane CA Adjacent to listed buildings Category 2 Employment Site	Potential to affect Lye Valley SSSI	Valley SSSI Site allocation SP3 establishes site is suitable for retail-led mixed use development, also planning permission (November 2021) for a mixed use scheme comprising retail, 225 residential units and hotel (16/03006/FUL). Site is suitable	New Landowner has confirmed intention to develop (2023) but is likely to submit a further planning application. Site is available	Planning permission. Site is viable	Adopted site allocation and confirmed landowner intention. Site expected to be developed within the Local Plan period.
44	Oriel College land at King Edward St and High St	R	R	0.27	OLP2036 SP49	Entire site within Central (University & City) CA Listed buildings within and adjacent to site High Buildings Area Within City Centre Archaeological Area Category 2 Employment Site	None identified	Site allocation SP49 establishes site is suitable for student accommodation and/or residential development and town centre uses, however as it is only upper floors then no evidence that the site could accommodate 10+ net gain. Site is suitable	Landowner (Oriel College) (2023) has no intention to develop for student accommodation within the plan period or if at all. Site is not available	Allocation accepted by LP2036 Inspector Site is viable	No confirmed intention from landowner to deliver site within the plan period, or that it will deliver 10+ net gain.
69	County Hall	R	R	0.33	Falls within OLP2036 AOC1 West End	Entire site within Central (University & City) CA View Cone/High Buildings Area Within City Centre Archaeological Area Site adjoins the Oxford Castle Scheduled Monument Contains listed buildings Category 2 Employment Site	None identified	Identified (but not allocated) in the West End Area Action Plan for residential and other uses. Site is also within the LP2036 Area of Change AOC1 West End and Osney Mead, which supports comprehensive regeneration of the wider area. Site is suitable	Currently in use as County Council main offices. Existing occupants would need to be relocated to new offices. Landowner intention (2023) to retain for employment uses only. Not available	Site is viable typology. Site is viable	No landowner intention to redevelop the site, site not expected to be developed within the Local Plan period
70	Island Site (Park End Street/ Hythe Bridge Street)	A	A	0.63	OLP2036 SP1	Partially within Central (University & City) Area Conservation Area High Buildings Area Within City Centre Archaeological Area Adopted OHAR located within site Category 2 Employment Site	Flood Zone 2 (23%) Flood Zone 3a (6%) Flood Zone 3b (3%) (brownfield) Both boundaries adjacent to Wareham Stream and eastern boundary adjacent to Castle Mill Stream	Site allocation SP1 establishes that site is suitable for mixed use developments including residential and/or student accommodation. West End and Osney Mead SPD (2022) adds more detail. Site is suitable	Landowner intention (2023) to facilitate a general improvement to the area including mixed uses, likely to be developed in conjunction with Worcester Street Car Park. Some units are currently in use and occupied so would need to be vacated prior to development taking place. Site is available	Allocation accepted by LP2036 Inspector. Site is viable	Adopted site allocation. Site expected to be developed within the Local Plan time period.

110	Speedwell House (west part)	R	R	0.15	OLP2036 Evidence Base	<p>Entire site within Central (University & City) CA High Buildings Area Within City Centre Archaeological Area</p> <p>Category 2 Employment Site</p> <p>Adjacent Listed Buildings</p>	None identified	<p>The site is occupied by Oxfordshire County Council offices and car park as well as some student accommodation. The site is in the Central Conservation Area and includes some large trees. The site is within the high buildings area. Suitability for residential is untested.</p> <p>Site is suitable for economic</p>	<p>Landowner, Oxfordshire County Council, confirmed (2023) no intention to develop the site for residential uses.</p> <p>Site is not available</p>	Site is viable typology	Site is not available, no landowner intention to develop within plan period
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121	Former DHL site, Sandy Lane West	R	R	2.83	OLP2036 Evidence Base	Category 2 Employment Site (Former Pickfords Site)	None identified	Cat 2 employment site. Suitability for residential untested. Suitable for employment.	Recent planning applications for modernisation of the site for light industry/ warehousing and part of the site has already undergone modernisation. No further land available for economic use. Unlikely to be available for residential in light of recent investments. Not available	Site is non-viable typology but recent modernisation/ investment in the site indicates site is viable for economic uses. Site is viable	Recent modernisation on the site, and no additional employment land available
122	New Barclay House	R	R	1.04	OLP2036 Evidence Base	Category 2 Employment Site	34% in Flood Zone 3b. (brownfield) 100% in Flood Zone 2	Part of the site is within Flood Zone 3b (brownfield) and the rest in FZ2. Suitability for residential untested. Site is suitable for economic use	Currently in use as commercial/offices. Landowner 2022 update, confirmed intention to retain for employment. Not available	Site is viable	No evidence of intention to redevelop. Site not expected to be developed within plan period.
379	Horspath Road Offices and Depot	R	R	0.308	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Category 2 Employment Site. Suitability for residential is untested. Suitable for economic use	The site is currently in use as a depot by City Council, limited capacity to add any further floorspace, and no intention to redevelop. Not available	Site is viable	In use for employment, not available for development
459	Buildbase Watlington Road (within #503 County Trading Estate)	R	R	2.32	OLP2036 Evidence Base	Within Category 2 site - County Trading Estate, Watlington Road	None identified	Currently in use for employment, within wider Cat 2 site. Opposite housing but separated by busy B480 road. Suitability for residential untested. Suitable for economic	Currently in use as a builders merchant. No recent indication of landowner intention to develop	Non-viable typology	Not suitable or available
492	Former Blackwells Publishing, Marston Street	R	R	0.51	OLP2036 Evidence Base	View Cone Adjoins St Clements and Iffley Rd Conservation Area Part of the site (108 Cowley Road) is listed on the Oxford Heritage Asset Register (OHAR) Category 2 Employment Site	A protected tree lies adjacent to the existing access to the site (Tree Preservation Order 74/00002/STC)	View cone and adjoining Conservation Area would limit capacity. Backland site, therefore existing residential properties surrounding the site could potentially impact on site layout (and capacity). Protected Category 2 employment site. Part also fronts onto Cowley Road. Suitability for residential untested. Site is suitable for economic	Currently in economic use. No evidence of landowner intention to develop or intensify. Site is not available	Site is viable typology	Site not available
496	Blackwells, Beaver House, Hythe Bridge Street	R	R	0.435	OLP2036 Evidence Base CFS update 2021	Historic Core Area Within City Centre Archaeological Area Adjacent Central (City & University) CA Category 2 Employment Site	43% in Flood Zone 3a (brownfield); 64% in Flood Zone 2	Protected category 2 employment site, all occupied. Suitable for economic but no additional capacity likely. Suitability for residential untested. Suitable for economic	Currently occupied by financial departments of Oxford University, and confirmed (2023) no intention to develop any residential during plan period. Not available	Site is viable typology	Site in economic use and no landowner intention for further development
502	Chiltern Business Centre, Garsington Road	R	R	0.85	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Category 2 Employment site. Part of site (Grehan House, a former office block at front of the site fronting onto Garsington road) converted from B1 to residential under prior approval application 13/03426/B56. Remainder behind this is still in use as storage/ workshop/ warehousing. Suitability for residential untested. Suitable for economic.	Currently in use for employment and no indication of landowner intention to redevelop site. Not available	Site is viable typology	Site in use for economic and no indication of intention to redevelop

503	County Trading Estate, Watlington Road (includes #459)	R	R	9.7	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Category 2 Employment site. Suitability for residential untested.	Currently in use for employment and no indication of landowner intention to redevelop site. Not available	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
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506	Fenchurch Court, Bobby Fryer Close	R	R	1.18	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Site in Category 2 employment use, and surrounded by economic uses on the Bobby Fryer estate, such as warehousing, storage. Suitable for economic use. Suitability for residential untested.	Currently in use for employment and no indication of landowner intention to redevelop site. Not available	Site is viable typology	Site in use for economic, and no indication of intention to redevelop.
509	Harrow Road Industrial Estate, Watlington Road	R	R	4	OLP2036 Evidence Base	Category 2 Employment Site Adjacent Oxford Stadium CA	None identified	Site in Category 2 employment use, adjoining uses include car repairs and machinery hire. Suitable for economic use. Suitability for residential untested	Application submitted 1.10.18 (application reference 18/02598/FUL) for demolition of an existing building on site (Use class B1) and erection of single story building to provide vehicle hire facility (Sui Generis). Permission refused December 2018. No other evidence of landowner intention to redevelop site. Not available.	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
510	Horspath Industrial Estate, Peterley Road/ Pony Road	R	R	8.03	OLP2036 Evidence Base	Category 2 Employment Site Adjacent Green Belt land	None identified	Site in Category 2 employment use, adjoining uses such as warehousing and storage. Suitable for economic use. Suitability for residential untested.	Application submitted 9.8.18 (application reference 18/02141/FUL) for change of use on part of site from light industrial unit (B1) to drive-thru car wash (Sui Generis). Application withdrawn February 2019. No other evidence of landowner intention to redevelop site. Not available.	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
512	Jordan Hill Business Park, Banbury Road	R	R	2.19	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Site in Category 2 employment use business park, adjoining uses mostly offices. Suitable for economic use. Suitability for residential untested.	Currently in use for employment and no indication of landowner intention to redevelop site. Not available.	Site is viable typology as it is brownfield. Site is viable	Site in use for economic and no indication of intention to redevelop.
513	King Charles House, Park End Street	R	R	0.35	OLP2036 Evidence Base	Historic Core Area Within in City Centre Archaeological Area Listed building opposite. Category 2 employment site	None identified	Site in Category 2 employment use. Suitable for economic use although unclear how much additional net capacity there would be. Suitability for residential untested. Within West End and Osney Mead SPD area	Currently in use for employment and no indication of landowner intention to redevelop site. Site not available.	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
515	Nuffield Industrial Estate, Sandy Lane West	R	R	3.47	OLP2036 Evidence Base	Category 2 Employment Site	None identified	Site in Category 2 employment use. Suitable for economic use. Suitability for residential untested	Currently in use for economic. Planning permission for part of site (18/01946/FUL) for change of use of first floor Office (Use class B1) to Specialist Cancer Care Centre (use class D1) July 2018. No other indication of landowner intention to redevelop site or indication of capacity for net gain in floorspace. Not available.	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
520	Knights Court and surrounding buildings (former Telephone Exchange and offices, St. Luke's Road / Between Towns Road	R	R	0.6	OLP2036 Evidence Base	Category 2 Employment Site Within Cowley district centre	None identified	Site in Category 2 employment use as offices mainly. Suitable for economic use. Suitability for residential is untested.	Site in use for employment with no additional floor area available, and landowner intention (2023) to retain for employment (Oxfordshire County Council). Site is not available	Site is viable typology as it is brownfield. Site is viable	Site in use for economic and no indication of intention to redevelop.

586	Osney Mead	A	A	17.8	OLP2036 SP2	<p>This site is located adjacent to Osney Island CA Located within both a View Cone and the Historic Core Area</p> <p>Category 2 Employment Site</p> <p>Adjacent to part of Core Gi network (Willow Walk Meadow)</p>	<p>Flood Zone 2 (86%) Flood Zone 3a (57%) Flood Zone 3b (35%) (brownfield) Adjacent to River Thames, Bulstake Stream, Osney Stream and part of Core Gi network (Willow Walk Meadow)</p>	<p>Site allocation SP2 establishes that site is suitable for mixed use development including employment, academic, student accommodation, employer-linked affordable housing and market housing. West End and Osney Mead SPD (2022) adds more detail.</p> <p>Site is in close proximity to the proposed Oxford Flood Alleviation Scheme (OFAS) which will help overcome access/egress issues.</p> <p>Site is suitable</p>	<p>Site occupied by a range of employment uses. Various landowners including Oxford University.</p> <p>Site is available but delivery could be dependent on OFAS.</p>	<p>Allocation accepted by LP2036 Inspector. Site is viable</p>	<p>Adopted site allocation. Site expected to be developed within the Local Plan time period.</p>
594	Somerville College	R	R	2.02	Planning application	<p>The entire site is located within the Central (University & City) CA Several Grade II Listed Buildings within the site and Grade II and II* (The University Printing House (The Clarendon Press)) immediately adjacent Historic Core Area High Buildings Area Part of the site lies within the Archaeological Area</p> <p>Category 2 Employment Site (28-31 Little Clarendon Street) lies within the site</p> <p>Part of the site lies within the Little Clarendon Local Centre</p>	<p>None identified</p>	<p>Planning permission (16/03062/FUL and 18/00183/VAR) approved March 2017 and March 2018 respectively establishes that the site is suitable for student accommodation.</p> <p>Site is suitable</p>	<p>Planning permission indicates landowner intention to develop. Work has completed (Dec 21) on Phase 1, (Undergraduate - 48 rooms) but Phase 2 (Postgraduate) yet to commence. Landowner confirmed in April 2023 that college are unlikely to implement Phase 2 due to funding. No further development anticipated.</p> <p>Site not available</p>	<p>Development has built phase 1. Site is viable</p>	<p>Phase 1 is built out. Phase 2 not expected to be implemented so not anticipated any further delivery on this site within plan period.</p>
607b	Botley Road Retail Units	R	A	7.76	Oxplan 2050 Call for Ideas	<p>Adjacent to Green Belt Adjacent to parts of Core Gi network (Osney Mead LWS, Field North of Osney Mead OCWS)</p> <p>Small portion of the site designated as a Category 2 Employment Site (Rear of 165-167 Botley Road)</p>	<p>Flood Zone 2 (82%) Flood Zone 3a (36%) Flood Zone 3b (19%) (brownfield) (Large proportion of land adjoining the site boundary is in Flood Zone 3b) NW corner approximately 20m from Seacourt Stream/Wytham Stream. Rear boundary adjoins wildlife sites</p>	<p>Much of site and surrounding area is within Flood Zone 3 including 33% in FZ3b (brownfield), safe access and egress will be essential. Suitability for residential is untested.</p> <p>Planning permission on part of site (Unit 1 and 2, former Oak Furniture Land) confirms site suitable for economic. Development brief for entire site adds more detail.</p> <p>Site is in close proximity to the proposed OFAS</p>	<p>Site is made up of several plots and complex landownerships. Permission granted on one plot for R & D use (21/02053/FUL).</p> <p>No intention from other landowners to redevelop.</p>	<p>Site is viable typology</p>	<p>Site is suitable and part available for commercial/economic use</p>
611	1-3 Cambridge Terrace	A	A	0.104	Call for Sites 2021	<p>Part of site is designated as a Category 2 Employment Site</p> <p>Adjacent to Listed Buildings (Campion Hall and Clarks House) Entirely within Central (University & City) Conservation Area Historic Core Area High Buildings Area Archaeological Area</p>	<p>None identified</p>	<p>City centre location, currently in employment (office) use Cat 2 site. Surrounding uses are varied include student accommodation, employment and civic. Site is suitable for residential or economic but need to retain employment so any development would need to be net gain.</p> <p>Site is only 0.1ha so whilst there could be intensification it is unlikely to be able to achieve a net gain of 10+ in addition to retaining employment, so doesn't meet minimum threshold.</p> <p>Site is suitable</p>	<p>CFS 2021 indicates landowner intention to develop for student accommodation and employment uses.</p> <p>Consultation response to Preferred Options 2022 confirms site available for mixed use.</p> <p>Site is available</p>	<p>CFS indicates site is viable</p>	<p>Site is promoted by landowner, however any development would be unlikely to be able to achieve a net gain of 10+ dwellings as site is only 0.1ha.</p>

Appendix 2.3: Category 3 Sites

HELAA Ref	Site Name	Potential for Housing Accept/ Reject	Potential for economic use Accept/ Reject	Total site area	How site identified	Policy considerations	Physical considerations	Suitability	Availability	Achievability	Justification
123	Pathway Workshop	R	R	0.32	OLP2036 Evidence Base	None identified (Unprotected employment site)	Small portion of the site lies within Flood Zone 3b Within 35m of a G2 Oxford City Wildlife Sites (Spindleberry Park).	Site is located within a residential area and is currently in economic use. A very small portion of the site is within Flood Zone 3b, no evidence of other constraints within or around the site. Suitability for residential untested. Suitable for economic and residential use	No evidence of intention to redevelop. Awaiting 2022 update. Not available	Site is viable	No evidence of intention to redevelop.
401	Littlemore House (formerly Littlemore Park (SAE Institute))	R	A	2.453	OLP2036 Evidence Base	Within 200m of local nature designation Within setting of listed building (Littlemore Hospital)	Flood Zone 2 (less than 0.5%)	Currently in use as mixed B1 and D1. Planning permission (2021) for additional R&D 20/02672/FUL, plus further application 22/02969/FUL for R&D with ancillary accommodation, clinic, educational floorspace and restaurant. Suitable for economic	In current use by the SAE as their world headquarters, recent planning permission and further application indicates intention to intensify employment uses onsite. Available for economic	Recent planning permission indicates site is viable. Site is viable	Site is suitable for intensified economic uses, as confirmed by recent planning permission for additional floorspace, and likely to be developed within plan period.
428	Rectory Centre	A	R	0.21	Call for Sites 2022	Within View Cone Within East Oxford - Cowley Road District Centre	None identified	Site is currently in use for healthcare. Adjoins residential area and is in district centre. Site is suitable.	Landowner (2023) confirmed intention to redevelop for residential uses subject to consolidating onto alternative sites. Site is available	Landowner confirmed intention to develop, believes site is viable. Site is viable	Site is suitable and landowner has indicated intent to redevelop for residential within the Local Plan time period.
494	Warehouses off Kiln Lane	R	R	1.53	OLP2036 Evidence Base	None identified.	Eastern by-pass roadabuts the western edge of the site with a large area of dense vegetation/shrubbery to the south	Existing employment site comprising several warehouses with access off Kiln Lane. Not designated as a Category 1 or 2 employment site and given that surrounding uses are predominantly residential in character, the site could potentially be suitable for this use should employment use no longer be required on the site. Special consideration would need to be given to the design and site layout, with a buffer incorporated into the western side to reduce the level of noise generated from the by-pass. Site is suitable for economic or residential	Occupied by specialist local firm Unicol, who have been established in Oxford since 1960s and have no plans to relocate or redevelop site. Site is not available	Site is a viable typology Site is viable	In economic use no additional floor area available. Site not available
495	Bocardo Court	R	R	0.46	OLP2036 Evidence Base	Site entirely within Temple Cowley Conservation Area	None identified	Site is currently in economic use, although surrounding uses are mixed including other employment, civic buildings and residential. The site could therefore be suitable for either economic or housing development, especially as it is not a designated Category 1 or 2 employment site. The site lies within a conservation area, therefore special consideration would need to be given to the design and layout of the site. Site is suitable	Currently occupied for employment uses. No evidence that the site is available or that the landowner intends to intensify employment use on the site. Site is not available	Site is a viable typology Site is viable	In economic use no additional floor area available. Site not available

504	Dairy Depot, Old Abingdon Road	R	R	0.77	OLP2036 Evidence Base	Adjacent to listed buildings	95% in Flood Zone 3b (brownfield).	Site in employment use. Adjoins railway line so sound buffers may be needed for some uses. Almost entirely in FZ3b (brownfield) so any development needs safe access and appropriate flood risk mitigation. Suitable	Currently in use for employment and no indication of landowner intention to redevelop site. Not available	Site is viable typology	Site in use for economic and no indication of intention to redevelop.
516	474 Cowley Road (Former Powell's Timber Yard)	A	R	0.34	OLP2036 Evidence Base Planning Application	Adjacent to Core GI network (Elder Stubbs Allotment)	Flood Zone 2 (100%) Potential to affect Lye Valley SSSI	Planning permissions (17/01463/FUL and 20/00040/VAR) for a care home (now expired) establish that the site is suitable for residential development. Site is suitable	Landowner has confirmed continued intent to develop for residential (care home). Site is available	Planning permission indicates site is viable. Site is viable	Site expected to deliver during local plan period.
616	Osney Warehouse (former #73) and St Thomas School House (former #72)	A	A	0.41	Call for Sites 2021	Falls within Policy AOC1 West End and Osney Mead Partly within Central (University & City) Conservation Area Historic Core Area High Buildings Area Archaeological Area	Approx. 60m from Wareham Stream Flood Zone 2 (93%) Pedestrian access to City of Oxford College separates the two sites	St Thomas School House is currently occupied by multiple social enterprises/ community uses. Osney Warehouse is currently occupied by OVADA - a visual arts company that includes studio, exhibition and education spaces/community uses. Community uses would need to be reprovided in any redevelopment which would limit capacity for net gain of resi. Surrounding uses include housing, employment and education. The sites were identified (but not allocated) in the former West End Area Action Plan for residential use and open space. No insurmountable constraints identified. Site is suitable but unlikely to be able to achieve net gain of 10+ in addition to reproviding community uses	CFS 2021 indicates landowner intention to develop, and confirmed in Preferred Options response 2022 intention to develop for employment and possibly some resi. Site is available	CFS indicates site is viable and the site is a viable typology. Site is viable	Site is suitable and available but unlikely to achieve net gain of 10+.