Oxford
Local Plan 2036

PREFERRED OPTIONS

30th June - 25th August 2017

Building a world-class city for everyone

An online questionnaire is available at
www.oxford.gov.uk/localplan

If you have any questions please

email
planningpolicy@oxford.gov.uk

phone
01865 252847

or write to
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Please give us your comments by
25th August 2017

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1. Introduction

The Oxford Local Plan 2036

1.1   Oxford City Council is producing a new Local Plan for Oxford. **The Local Plan is important because it will shape how Oxford develops.** It will set out how we want our City to look and feel; it will guide new developments to the right locations whilst protecting and improving the environment and people's quality of life; it will deliver the new homes, businesses, jobs, shops, and infrastructure needed to support the growth of Oxford over the next 20 years to 2036. It will be used in determining planning applications and to guide investment decisions across the City. We want make sure that Oxford continues to be a successful and attractive city; the kind of place people enjoy living in, working in and visiting.

Preferred Options Stage – How it works

1.2   This *Preferred Options Document* contains a series of proposed policy approaches, or 'options' relating to various issues. All of the options worthy of consideration at this stage have been included. Options are either 'preferred', 'alternative' or 'rejected'. A short commentary next to each option describes the likely effects and positives and negatives of each approach. This document does not contain draft policies, and options do not contain all of the detail that will be included in a final policy – it is intended as the means by which we move onto the final policy stage next year. Not all sets of options are mutually exclusive, and the final policies could be a combination of more than one option, or take elements from individual options.

> **The Local Plan is important because it will shape how Oxford develops.**

1.3   As well as containing options for policies relating to different topics, possible sites for development are shown. Sites are shown in the document as well as being summarised in the map in the Sites Section 9. Some sites identified during the process have been rejected following detailed appraisal. These are listed in the Sites Section 9. The methodology for identifying sites, appraising their suitability for development and deciding on appropriate uses is explained in the Sites Section 9.

We want to know what you think

1.4   **We are seeking comments on this document for 8 weeks between Friday 30th June and Friday 25th August 2017.**

1.5   We are interested to know whether you agree with the Preferred Options we have identified. We have created a questionnaire to help you respond. We would also be pleased to hear any ideas you have for details to include in policies when we come to draft them.

What happens next?

1.6   This is the second of three scheduled stages of public consultation as we develop a new local plan. The stages are as follows:

First Steps Consultation

This stage was designed so people could have their say on the key issues that the Oxford Local Plan 2036 should consider.

June to August 2016

After the first steps consultation ended we considered all the comments submitted to us, as well as other evidence and studies, and used them to inform development of potential policy options.

WE ARE HERE

Preferred Options Consultation (Regulation 18)

We are sharing the policy options with you and asking what you think.

June to August 2017

When the options consultation ends we will consider all the comments submitted to us, as well as other evidence and studies, and will start to write the draft Plan.

Final Consultation (Regulation 19)

You will get to see the draft Plan and comment on it before it is submitted to government for independent examination.

June to July 2018

When the final consultation ends we consider the comments and may make minor amendments. We will then submit the proposed Plan to the government for examination. We will send copies of all the comments made at the final stage of consultation, as well as summaries of all the comments received at the earlier stages.

December 2018

Submission of Local Plan to the Secretary of State for independent Examination

Local Plan Examination

A government inspector will hold an Examination to help them assess whether the Oxford Local Plan 2036 sets an appropriate strategy for guiding Oxford's future growth. Hearings will be open to the public.

Spring 2019

Mid/late 2019

Local Plan Adoption

The Plan is adopted by the City Council. It then provides the strategy for the development of Oxford up to 2036 and will be used to determine planning applications and investment decisions.

Sustainability Appraisal and Habitats Regulation Assessment

1.7 A *Sustainability Appraisal* is an appraisal of the economic, environmental, and social effects of a plan. The intention is that it is undertaken from the start of the preparation of a plan to help ensure decisions lead to sustainable development. In June 2016 we published a *Sustainability Appraisal Scoping Report*. This identifies baseline information regarding, economic, social and environmental issues within Oxford and identifies other plans and guidance, to European level, that have a bearing on the formulation of plans within Oxford.

1.8 A draft *Sustainability Appraisal* (SA) has been published alongside this *Preferred Options Document*. The SA assesses the objectives of the Oxford Local Plan 2036 (shown in the Strategy and Core Principles section below) against the *Sustainability Appraisal* objectives (set out in the *Scoping Report*) in order to confirm general consistencies between the two sets of objectives.

The SA process has ensured all aspects of sustainability have been properly considered.

1.9 As the Preferred Options for the Oxford Local Plan 2036 were developed, the draft SA assessed these options against the SA objectives to predict and evaluate their effects. The SA can also suggest how to make options more sustainable. The SA process has ensured all aspects of sustainability have been properly considered. The Preferred Options need not be the most sustainable, but it will be made clear where other considerations have led to selection of the option.

1.10 The Habitats Regulation Assessment requires an Appropriate Assessment on any plan which could alone, or in combination, have a significant effect on a site of international importance. We will undertake a screening process to determine whether or not the Plan will have a significant effect on the European designated Oxford Meadows Special Area of Conservation (Port Meadow). This screening opinion will be submitted to Natural England. If it is likely to have a significant effect, we will undertake an Appropriate Assessment to inform the Draft Plan (Proposed Submission document).

Strengths, challenges and vision for Oxford in 2036

Table 1: Oxford's strengths and role

Economy knowledge and research

Oxford is in a fortunate and positive position, having a broad, diverse and active economy. The city has one the highest concentrations of knowledge intensive businesses in the UK. Oxford's role in the regional and national economy is vital. It is the 'service centre' for the Oxfordshire economy, having the fastest growing and best educated workforce, and also being the main centre of research and spin-outs in the county. Positive indicators of the strength and success of Oxford's economy include the very low levels of unemployment, the good rate of new companies being set up, and that established employers are keen to move into the city.

Retail and tourism

Oxford's high streets are full and active and the vacancy rates are low. The market is confident for the future with significant investment planned and being delivered, such as the new Westgate. Oxford is a major draw for visitors from overseas, domestic tourists and day visitors. It attracts approximately 7 million visitors per year, generating £780 million of income for local Oxford businesses.

Life, culture, health and well-being

Oxford offers the opportunity for a high quality of life for its residents. It is a desirable place to live. The population is diverse and youthful giving the city life and vibrancy. The range of amenities, facilities and services available in Oxford mean it punches well above its weight for a city of this size. Oxford has excellent museums and cultural opportunities and hospitals offering cutting edge research and treatments.

History and urban environment

The wealth of historic and architectural assets in Oxford is a significant draw for investors, visitors and those looking to locate in the city. Beyond the world renowned historic core, Oxford is made up of a series of communities with clear and distinct identities and character that bind those that live there.

Natural environment

Oxford is a city with a rich natural environment; the two rivers and their valleys and areas of real significance in terms of landscape and biodiversity are located in close proximity to large parts of the community. Areas for informal and formal recreation are easily accessible, and are important for people's health and wellbeing. They provide a vital green lung to the compact city, and provide space for formal and informal recreation.

Travel

Oxford is a compact city with a well-established pattern of sustainable travel. Cycling rates are high, bus services are comprehensive and frequent, and rail services are expanding and being improved. Consequently the population of the city is less reliant on the private car than in most other British cities.

Environmental responsibility

The City Council has pledged to achieve net zero greenhouse gas emissions within the second half of the century. It intends to maintain its position as a leading UK Local Authority in tackling climate change and intends that by 2050 it will use only 100% renewable energy.

Issues and challenges

1.11   Oxford's success means that it is an attractive place to live, work and study. This results in a high demand for land, with knock-on consequences for prices and infrastructure provision. The pressures of success can be seen in the high house prices, congestion and poor air quality in certain areas. These are issues that are significant and this Plan will seek to influence them positively. At the time of writing the extent of the challenges associated with Brexit are unknown. What is clear however is the UK is entering a period of uncertainty.

Cost and supply of housing
- Greatest affordability issue of any city in the UK;
- Average house prices more than 16 times average wage;
- Major employers including NHS, BMW and schools are reporting skills shortages linked to high house prices, which are affecting ability to attract firms;
- Universities concerned they will be unable to attract top academics and researchers;
- Oxfordshire Strategic Housing Market Assessment (SHMA) identifies housing need between 24,000 and 32,000 additional new homes 2011-2031.

Efficient use of Land
- With increasing pressure for growth and development land scarce, efficient use of land is increasingly important;
- Creates challenges in creating a high quality environment;
- A significant amount of housing need will need to be met elsewhere in Oxfordshire.

Heritage importance, including historic skyline;
- Large parts at risk of flooding and climate change will increase extent, severity and frequency.

Constrained city
- Much undeveloped land in Green Belt;
- Areas of national and international biodiversity interest.

Educational attainment
- While 43% of Oxford's population was qualified to degree level (2011 Census, estimated risen to 60%), 22% of people aged 16+ have fewer than 5 GCSEs at C or above;
- Education and skills deprivation is particularly concentrated in the communities to the east and south east of oxford;
- Creates a barrier to local people accessing jobs in the knowledge-intensive activities Oxford's economy is built around.

Oxford's Issues and Challenges

Managing rapid growth
- Population increased by 12% in last decade;
- Significant economic and population growth expected to continue over the Plan period;
- challenges include pressure on infrastructure, declining affordability and skills shortages;
- Must accommodate growth in a way that builds on characteristics that make Oxford special.

Ensuring wide benefits of economic growth
- Challenge to guide economic growth so that its benefits are felt widely, in a way that helps overcome social disparities.; After housing costs, 1 in 4 children live below the poverty line;
- Men in the most deprived areas live 9 years less on average than those in the least deprived areas.

Traffic congestion and air quality
- Medieval streets often narrow and not well suited to motorised vehicles so conflict for limited space between different transport types;
- Areas of poor quality in the centre, district centres and ring road junctions, attributable to road traffic;
- In Oxford 5.6% of all mortality is attributable to long-term exposure to fine particulate matter (PM2.5);
- Low Emission Zone (LEZ) introduced for the city centre in 2014 led to improvements but levels of some pollutants are still above target levels, requiring us to take action now.

Need shift to sustainable travel
- With predicted growth, a continuation of existing travel behaviour would threaten to over-burden the transport network, compromising the character of oxford, quality of life and economic success;
- Challenge to shift more journeys on to walking, cycling , public transport and reduce need to travel;
- Ensure attractiveness of sustainable modes of travel to areas outside centre, to where travel by bus has remained static over the last decade.

Vision - Oxford 2036

1.12   The Oxford Local Plan 2036 will look at least 20 years ahead and consider how it can best address these pressures and challenges. Oxford will continue to grow and develop. This growth will be associated with a liveable and sustainable environment that balances economic, social and environmental needs, ensuring that the city remains a highly desirable place to live, work and visit. Oxford will continue to have a strong economy, contributing to advancements in learning and innovation locally, nationally and globally. To achieve this, Oxford will need to be considered as the heart of the city region.

Table 2: We want Oxford in 2036 to:

A centre for learning, knowledge and innovation

- Be at the forefront of research and innovation;
- Be a global centre for research, education and healthcare;
- Be home to high-tech firms and start-ups;
- Have a well-educated workforce;
- Have an appropriately skilled local workforce which provides a pool of talent to support businesses and institutions.

A prosperous city with opportunities for all

- Continue to have a diverse, globally competitive economy led by innovation;
- Have low unemployment;
- Have used training, skills, and apprenticeships to address the divide between the prosperous and the deprived parts of the city;
- See the benefits of being a high-performing, smart economy, such as a clean, well-designed city with quality infrastructure.

An environmentally sustainable city

- Be an exemplar of low carbon development;
- Have made progress towards the Council's commitment to achieve net zero greenhouse gas emissions in Oxford this century;
- Have led the way in developing and adopting new technologies to help create a clean and green environment;
- Insist on high levels of energy efficiency;
- Produce energy from local, renewable and low carbon sources;
- Be resilient to the impacts of climate change;
- Have reduced private car travel and a good network of safe and accessible cycling and walking routes;
- Have greatly reduced vehicle emissions through the use of zero emission vehicles, including buses;

An enjoyable city to live in and visit

- Benefit from high quality new architecture which integrates well with the existing historic environment, townscape and landscape character;
- Access to high quality green spaces, cultural and community facilities;
- Have a network of open spaces rich in biodiversity offering multiple benefits to health and wellbeing through their social, environmental and recreational value;
- Accommodate its visitors successfully, particularly in the city centre, having reduced conflicts between different users;
- Inspire people to find joy in their surroundings and interaction from their environment.

A strong community

- Have reduced inequalities;
- Offer a range of housing types, sizes and tenures to suit the varied needs of our population;
- Provide a wide range of facilities and services within easy access;
- Provide spaces and opportunities for social interaction bringing people together;
- Be made up of diverse yet cohesive communities;
- Engender a sense of civic pride.

A healthy place

- Offer the opportunity for healthy lifestyles;
- Provide homes offer good living standards;
- Offer access to excellent healthcare;
- Support high participation in sport and recreation;
- Provide healthy travel choices;
- Benefit from significant improvements in air quality.

Local Plan objectives and strategy

Building on Oxford's economic strengths and ensuring prosperity and opportunities for all

1.13 *Objectives*
- To build on Oxford's economic strengths as a global centre for research, learning and health care
- To remain at the heart of the Oxfordshire economy and an important contributor to the national economy in its key strengths in the knowledge intensive businesses (such as education, health, science and technology, and as a leading environmentally sustainable city)
- To reduce inequalities across Oxford, particularly in employment, health and education
- To provide a diverse range of employment opportunities to meet the needs of the city's businesses and residents, allowing Oxford to grow and function sustainably, and with a skilled workforce ready to fill the employment opportunities that arise

Local plan strategy to achieve these objectives:

1.14 *Ensuring sufficient economic sites*
To help support Oxford's role as a fast-growing city, generating economic growth for the local and national economy, it is vital that sufficient sites are protected and allocated for economic use. 'Employment sites' include offices, research and development, manufacturing plants and warehouses. The Oxford Employment Land Assessment 2016 found that demand for employment land is in excess of current supply. Oxford has a number of existing employment sites and one large new site allocated at Northern Gateway. Even if a more conservative 'mid-point' estimate of growth is used to predict demand, demand for B1 (office and research and development) floorspace in particular is well in excess of existing supply.

1.15 *Redevelopment and mix of uses on employment sites*
In order to make the best use of sites and to accommodate some of the demand for new floorspace that has been identified, the potential for intensification and modernisation will be explored. Alongside B1 office uses, B2 industrial uses also make an important contribution to the economy of Oxford, ensuring a diverse employment base. These uses should also be protected. B8 warehousing can use large amounts of land while offering relatively few jobs. In a constrained city such as Oxford this is not necessarily the most suitable use of land. The suitability of these sites for other employment uses, or other uses altogether can be considered.

1.16 *Location of employment sites*
The analysis in the ELA showed that the best performing areas for office uses were the city and district centres, together with Headington (at the hospital sites) and the south east (the Oxford Business Park and Science Park). The city and district centres are good locations for new employment space, especially B1, as long as it does not harm the retail offer or attractiveness of the centres for visitors.

1.17 *Education and skills*
The Plan will need to ensure land is safeguarded and protected to deliver school places, through retaining space for existing schools to expand and if possible new sites. The nature of most housing growth in Oxford is through small scale sites, so there is rarely an opportunity for an entirely new school to be provided. Most school provision will need to be made by growing existing schools.

> **...the potential for intensification and modernisation will be explored.**

Creating a pleasant place to live, delivering housing with a mixed and balanced community

1.18 *Objectives*
- To deliver as much housing as possible whilst balancing other important needs of the city's residents and businesses
- To deliver affordable housing and ensure that it meets the requirements of those in need
- To plan for an appropriate mix of housing sizes, types and tenures to meet the needs of existing and future residents as far as possible
- To ensure new homes are adaptable to the changing needs of the population and resulting from climate change, as well as being energy efficient to help reduce further climate change

Local plan strategy to achieve these objectives:

1.19 ***Provision of new housing***
Oxford's very high need for new housing means that general market house prices are expensive for both buying and renting. Home ownership is unlikely to be a reality for most people wishing to live within Oxford. Difficulties accessing housing can mean that employers can struggle to find staff, affecting desirability of locating in Oxford and the running of important services such as schools and hospitals.

1.20 Addressing the housing issue is the number one priority of the City Council. The Council will make full use of the range of tools and mechanisms at its disposal to ensure housing is delivered to meet the needs of the city. In the Plan this will involve looking at the contribution that greenfield land, Green Belt and land currently in other uses can make; as well as considering densities, building heights and space standards for example.

1.21 There is not capacity within Oxford's administrative boundary to meet all housing need. As far as possible, need should be met within Oxford or very close to its boundaries, as this will enable new development to be connected to areas of employment and other facilities by sustainable modes of transport. Discussions with the other Oxfordshire districts regarding Oxford's unmet housing need are progressing positively; three of the neighbouring districts have agreed to accommodate an element of this need and are progressing with their own Local Plan reviews to facilitate this.

1.22 ***Mix of housing and affordable housing***
It is important that new housing helps to meet the variety of needs as well as possible. Providing a mixed and balanced range of housing types is a priority. Innovative approaches to housing provision will be required, to enable a broad range of supply. Affordable housing will come in many forms. Housing that is affordable in perpetuity, that is permanently affordable, is strongly supported. This can be positively linked to employment opportunities, with costs linked to wages. Social rented housing is vital to provide homes for those in particular housing need. Private rented housing is likely to be the most realistic option for many. Ways to deliver this affordably so that attractive housing can be found for workers needed to support the functioning of the city's economy, including the Universities and hospitals, will be important. Shared housing, including co-housing and HMOs will also be important ways to ensure delivery of new housing.

Addressing the housing issue is the number one priority of the City Council.

Making wise use of our resources and securing a good quality local environment

1.23 *Objectives*
- To achieve improved air quality and high levels of energy efficiency, renewable energy provision and water conservation, maximising Oxford's potential in low carbon technologies
- To ensure efficient use of land by seeking opportunities for facilities to be multi-functional, and by maximising efficient use of scarce land
- To manage water flow and to help protect people and their property from the impacts of flooding
- To achieve significant progress towards its net zero greenhouse gas emissions aspiration across Oxford, with the City Council leading by example by continuing to reduce its own emissions and increase its use of renewable energy

Local plan strategy to achieve these objectives:

1.24 *Previously developed land*
The focus of new development will be on intensifying development on previously developed land. This consolidating approach to developing the city in future is not only best practice but essential in a constrained urban environment like Oxford. The Plan will seek to identify sites that are under used for example with low-rise buildings and unused spaces, or in a use that does not make most efficient use of land, such as large surface-level car parks. The redevelopment of such sites will help to accommodate the development needs of the city in a sustainable and efficient way; locating new development alongside existing uses, facilities and public transport connections.

1.25 *Greenfield sites*
It will be important to protect the majority of green spaces because of the variety of benefits they bring, which are particularly important in a dense urban environment like Oxford, such as recreational and health, biodiversity provision, adaptation to climate change, improvements in air quality, benefits. Opportunities will be sought to improve the quality of green spaces, with a focus on increasing the potential for them to form part of a network and to offer a multi-functional role, for example increasing biodiversity in parks. If it can lead to improvements in quality and public access of other green spaces, consideration will be given to allocating green spaces for development in order to help meet the development needs of Oxford. This will only be where they are not well used and located, do not offer a variety of functions and where they have little potential for improvement, or where a limited amount of development could lead to significant improvements of green space and public access on or very close to the site, which it would not be possible to deliver otherwise.

1.26 Green Belt areas in Oxford will be appraised using the formal process and tests set out by the government. Green Belt areas that do not have important public access value, are not in flood plain or of biodiversity importance will be considered for development, if development on those sites could take place while the integrity and purpose of the wider Green Belt is maintained. The City Council considers that exceptional circumstances exist to justify a Green belt boundary review due to the need to support Oxford's economic success and its dependence on the delivery of additional housing to meet housing need.

> **The focus of new development will be on intensifying development on previously developed land.**

1.27 *Intensification, density and height*

Land is a finite resource and Oxford is particularly constrained. To be successful in its aims and objectives, the Plan must ensure that efficient use is made of this land, so that growth can be accommodated and the city can continue to flourish. Due to the limited amount of development space, intensification of uses on sites will be an important way to accommodate growth. This will need to be delivered to a high quality and include consideration of density, indoor and outdoor space standards and heights.

1.28 *Mixed use and design standards*

When increasing heights and density, good design will be particularly important to ensure development fits well with its surroundings and offers good quality accommodation. The Plan will set the expectation for high quality in new development, using urban design principles and where necessary setting standards that will be required from proposals. Sites with mixed uses are characteristic of the urban environment, adding vibrancy and diversity to streets and neighbourhoods. A mix of uses and types of development will often be most successful and will be sought on larger sites.

1.29 *Balance housing and other uses*

The scale of housing need in Oxford is so large that even if every site came forward for housing, we would still not meet the target. A similar challenge exists for economic development. There are many and diverse needs and pressures on the city. A strong and healthy city is characterised by its ability to cater for the needs of its residents, workers and visitors. Given this it is important to allocate or protect sites for employment, retail, education, health, recreation and range of other uses alongside those for housing. It is very important to get the balance right between providing for these competing uses whilst making significant progress towards accommodating more homes.

The Plan will set the expectation for high quality in new development...

1.30 *Improving air quality and reducing carbon emissions*

Most air pollution in Oxford comes from diesel and petrol powered modes of transport. In addition to contributing to air pollution, transport also contributes to carbon emissions. The ability to reduce harmful emissions will depend on a variety of measures. These include reducing the need to travel, promoting development that can be accessed by sustainable modes of travel such as walking and cycling, measures that discourage car use, such as minimizing public and private parking and providing infrastructure to support low emission vehicles and sustainable modes of travel, such as bike parking and electric charging points. It is important in areas of poor air quality, that development is located and designed to minimize the potential negative impacts of air quality on its inhabitants in addition to ensuring the development itself does not contribute to air pollution.

Protecting and enhancing Oxford's green setting, open spaces and waterways

1.31 **Objectives**
- To protect and enhance a network of multi-functional green spaces and ensure easy access to high quality green space
- Enhance green spaces so they deliver multiple benefits to health and wellbeing, are rich in biodiversity, and help the city adapt to climate change

1.32 **Network of multi-functional green spaces**
Green spaces are particularly valuable in a compact city such as Oxford, and will be increasingly important with the population increasing. They bring a multitude of benefits including environmental (biodiversity, water management and air quality) to social (wellbeing, heritage and sense of place) and economic (direct jobs, tourism and creating an attractive business environment). Many are highly valued by residents and visitors. Opportunities will be sought to improve the quality of green spaces, with a focus on increasing the potential for them to form part of a network and to offer a multi-functional role, for example increasing biodiversity in parks. The Plan will focus on ensuring that green spaces are as high-quality and as multi-functional as possible, with public access particularly valued, as well as ensuring a network of green spaces connecting wildlife corridors and green accessible routes.

1.33 **Biodiversity**
Development provides an opportunity to build in biodiversity provision and measures to improve biodiversity. Careful consideration of landscaping schemes, green roofs and walls provide multiple benefits and are one way in which biodiversity can be built into the scheme as an integrated part, not an add-on.

1.34 **Waterways**
Oxford's waterways are a fundamental part of Oxford's character, landscape and setting. Spaces along waterways are attractive areas for recreation and also popular routes for walking and cycling, as well as often having value as flood plain and wildlife corridors. Along all of Oxford's waterways, new development that preserves these functions and in particular that enhances the recreational value, transport value and setting of these areas is to be encouraged. In and near to the city centre particularly, there is great potential to enhance areas around the waterways in a way that boosts its attractiveness.

> **Green spaces are particularly valuable in a compact city such as Oxford...**

Enhancing Oxford's unique built environment and heritage and creating quality new development

1.35 **Objectives**
- To preserve and enhance Oxford's exceptional built form with its legacy of archaeology and monuments, historic buildings, modern architecture, important views and distinctive townscape characteristics
- Ensure that all new development delivers a high quality of urban design, place making, architecture and public realm, integrating the historic environment with modern needs

1.36 **Historic environment and character**
Oxford's long history is reflected in outstanding buildings and features. This vast number and wide range of historic assets is a real benefit and advantage to the city. It is important to deliver new development in a way that respects and compliments this rich history, the historic buildings, parks

and gardens; conservation areas, archaeology and areas of distinct local character and townscape. The emphasis of the plan will be on the positive management of change, reflecting the city's capacity to move forward while preserving its irreplaceable heritage.

1.37   *Views and setting of Oxford*
There are important views of Oxford's world famous and unique skyline from within the city and the surrounding meadows and hillsides. The views of the skyline of the historic centre are fundamentally important to Oxford and must be protected. Development of new higher buildings will be an important part of accommodating necessary growth but must take place in the right locations. New interventions in the historic skyline must make a positive contribution if they are to be supported alongside views of Oxford's 'dreaming spires'. Larger developments of a continuous height are unlikely to achieve this. The impact of new developments on the historic skyline must be objectively understood and explained.

1.38   *High standards of design*
As well as providing enjoyable places in which to spend time, good urban design can also create safer environments and help to create a strong sense of place and identity. New development in Oxford will be expected to be of a high design quality that respects and enhances the character and appearance of the area in which it is located. Developments should be easy to understand and move through, be capable of adaptation for alternative uses, and help create an attractive and expanded public realm. New development should be of a quality that upholds the city's international reputation and adds the next layer of Oxford's future heritage. High environmental standards, for example BREEAM or passivhaus standards will also help to ensure environmental benefits and benefits for the development in terms of whole life costings.

1.39   *Public realm*
The public's main experience of buildings is from streets and public spaces. New development makes a vital contribution to the quality of the public realm. New buildings should sit comfortably within their surroundings; the best way to achieve this is through high-quality design that creates attractive and pleasant spaces. The allocation of space within the public realm (for example between pedestrians, cyclists and motorised traffic) and the design and materials used, can combine to create spaces that are at best a pleasure to be in, or at worst, spaces that people try to avoid. It will be important in Oxford that the best use is made of every public space, particularly in the city centre and in the district centres. Opportunities to increase the capacity and use of public spaces and improve the public realm will be encourages.

Ensuring efficient movement into and around the city

1.40   *Objectives*
- To ensure growth in the proportion of people walking and cycling to access jobs and facilities
- To provide enhanced facilities for walking and cycling, ensuring they are the primary modes for travel around the city
- To ensure walking and cycling routes are complemented with well managed and attractive public transport routes, and that car use is minimised

1.42   *Reducing the need to travel*
The location of development and the pattern of land use determines the need for travel, which influences transport related emissions. New development should be close to established sustainable transport networks, in particular walking and cycling networks or have the ability to connect to

New development makes a vital contribution to the quality of the public realm.

existing networks. New development that attracts large numbers of people should be located in district centres and the city centre where possible and employment development should be in well-connected locations, particularly the city and district centres and existing areas of employment. This is to help ensure these developments are easily reached by sustainable means of travel.

1.43   *Promoting more sustainable travel modes with new and improved routes*

Over the Plan period there are likely to be improvements to Oxford Rail Station, to the links with Oxford Parkway Station and the potential reopening of the Cowley branch line for passenger trains. The branch line would be extremely positive for sustainable travel in Oxford as it would serve areas with a large amount of housing and employment and offer a new travel option for existing and new residents and workers. The land needed for new stations at Oxford Business Park and Oxford Science Park should be safeguarded, along with any land needed for improvements to the line. The majority of public transport journeys in Oxford are made by bus, and so opportunities to improve bus routes or facilitate rapid transit options will be identified and explored particularly where they improve accessibility or have public realm benefits. Where new routes are identified in the transport strategy as having potential to improve the transport network, delivering more sustainable movement patterns, and where these routes have a potential delivery mechanism, they will be safeguarded. The Cambridge to Oxford expressway could be delivered during the Plan period. A key component of all major strategic transport infrastructure is consideration of 'first mile/last mile travel, and it will be particularly important in Oxford that there is infrastructure in place to enable connections by walking, cycling and public transport.

1.44   *Walking and cycling*

Walking is an essential component of almost all journeys. It has many advantages over other modes as it creates no emissions and does not contribute to congestion or damage the environment and is good for people's health and wellbeing. More people walking in an area can help deter crime and contribute to the building of social cohesion. Oxford's compact nature makes it a walkable city. The Plan will help encourage walking through the location of development and co-location of facilities, safeguarding of routes and connections through new developments and positive design of the pedestrian environment.

1.45   The percentage of workers cycling to work in Oxford, at 17%, is the second highest in England and Wales. An established cycling culture, and the relatively compact and flat urban area, contribute to this. There are many dedicated cycle routes in Oxford as well as 20mph zones which are likely to encourage cycling but there are opportunities to encourage more cycling. This can be done by joining up 'quiet routes', segregating cycling infrastructure to create attractive routes, providing sufficient cycle parking and integration with bus, train and rapid transit. Many of the areas with low cycling rates to work are those located around the ring road and the potential to improve cycling routes to and from these areas will be important.

The percentage of workers cycling to work in Oxford, at 17%, is the second highest in England and Wales.

Ensuring Oxford is a vibrant and enjoyable city to live in and visit and providing facilities and services

1.46   *Objectives*
   • Promote district centres as the hubs for local community focus and identity, with transport interchange and activity and provide a range of social, leisure, sport and cultural facilities appropriate to Oxford's diverse communities alongside housing and employment opportunities

- To ensure that development is supported by the appropriate infrastructure and community facilities
- Maintain the regional role of Oxford city centre as a primary focus for shopping, employment, leisure and cultural activities, with district centres playing an increased but complementary role
- To ensure the potential local benefits of Oxford's role as a major tourist destination are utilised

1.47   *Protecting facilities and supporting new facilities for a range of activities*

A wide range of community, leisure, sport, recreation and cultural facilities appropriate to Oxford's diverse communities are supported. Existing facilities should be preserved, unless suitable and accessible alternatives are proposed. New development that actively supports and sustains community wellbeing is to be welcomed.

1.48   *Multi-functional use of facilities*

It is important that the best use of facilities is made to provide for varied and changing demands and make efficient use of resources. Wherever possible a range of services and mix of uses should be provided at all local facilities. For example school halls often provide a useful resource for other community uses after school hours; community centres can be used for a wide range of activities and groups; and leisure centres can be used to host other activities as well as their traditional sporting function. One of the indicators of a strong and vibrant community is the number and range of community groups and activities available to residents. Every opportunity should be sought to accommodate such groups in existing community facilities in the locality.

1.49   *Locating facilities in accessible locations*

New facilities should be in accessible locations or locations that can be made accessible. A community facility in an easily accessible location at the heart of community will be much more popular and have a more sustainable future. Where possible they should be located in district centres, helping to promote them as hubs for the local community, and where there is transport interchange. Such locations make it possible for visits to community facilities to be linked to trips for other purposes like shopping trips, visits to the doctor or school drop-off for example.

1.50   *Oxford city centre*

The role of Oxford city centre as a primary focus for shopping, employment, leisure and cultural activities as well as a major tourist destination is vitally important to the overall success of Oxford. This varied role and mix of uses mean that it draws people in from all over the city, the county, and much further afield. It is performing very successfully against a range of measures, the range of services and amenities it offers is high, retail vacancies are low and visitor numbers are high. This success has however led to problems with congestion, air quality and over-crowding of the pavements and public realm. To address these problems and to accommodate some of the growth predicted it will be important to manage the competing interests in city centre. This may be possible through a review of the access and transport arrangements (for example by removing unnecessary trips/miles journeyed); providing opportunities to access "town centre uses" in alternative locations (for example providing for more facilities in district or local centres); and reviewing the role of specific streets/areas of the city centre to provide for different needs (for example a restaurant district or tourist focused area) and increasing the public realm and capacity of streets.

2. Building on Oxford's economic strengths and ensuring prosperity and opportunities for all

2.1 *Objectives*
- To build on Oxford's economic strengths as a global centre for research, learning and health care
- To remain at the heart of the Oxfordshire economy and an important net contributor to the national economy in its key strengths in the knowledge intensive businesses (such as education, health, science and technology, and as a leading environmentally sustainable city)
- To reduce inequalities across Oxford, particularly in employment, health and education
- To provide a diverse range of employment opportunities to meet the needs of the city's businesses and residents, allowing Oxford to grow and function sustainably, and with a skilled workforce ready to fill the employment opportunities that arise

A prosperous city with opportunities for all

A centre for learning, knowledge and innovation

National Planning Policy says:

2.2 The Government's vision through the *National Planning Policy Framework* (NPPF) is "to build a strong competitive economy" and that local planning authorities "should plan proactively to meet the development needs of business and support an economy fit for the 21st century". It states that the government is committed to ensuring that the planning system "does everything it can to support sustainable economic growth" (paragraphs 18 and 19).

2.3 The NPPF sets out requirements for local plans in this regard, local plans should:
- Set out a clear economic vision and strategy which proactively encourages sustainable economic growth
- Set criteria, or identify sites for investment to match the strategy and meet anticipated needs (for land or floorspace for all types of economic activity)
- Support existing business sectors and plan for new or emerging sectors; being flexible to meet needs not anticipated and allow rapid response to changing circumstances
- Plan positively for clusters or networks of knowledge driven, creative or high technology industries
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement
- Facilitate flexible working practices
- Avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose (paragraphs 21 and 22)

2.4 The *Planning Practice Guidance* (PPG) sets out more detail on how to assess the economic development needs of an area.

2.5   The Government recently published the Green Paper: *Building Our Industrial Strategy* (January 2017). In it the Government sets out its objective to improve living standards and economic growth by increasing productivity and driving growth across the whole country. It identifies 10 pillars to drive forward the country's industrial strategy: science, research and innovation; skills; infrastructure; business growth and investment; procurement; trade and investment; affordable energy; sectoral policies; driving growth across the whole country; and creating the right institutions.

The Oxford story – background evidence and the Sustainability Appraisal:

2.6   Oxford has a diverse economy being a focal point for education, research and science. These 'knowledge intensive' sectors represent 73% of total employment in the city. It is of one of the top five technology clusters in the world. As a globally known brand, Oxford has major assets which include two leading universities, and cutting edge research in areas including bio-tech, data science, quantum technology and robotics. The city is home to diverse international enterprises including BMW Mini, Oxford University Press, Sharp, Natural Motion, Unipart and Centrica among numerous others. Oxford's economy is broad-based and structurally resilient and provides one third of the county's jobs; home to around 4,600 businesses providing 114,000 jobs. There is a high level of in - commuting with 46,000 people coming into the city to work on a daily basis.

2.7   Oxford has extremely high employment levels; the Job Seekers Allowance claimant rate is low at 0.6% or 715 individuals (December 2015). Youth claimant count is also low at 0.3% or 85 people. However, 21% of the population is economically inactive (59% of economically inactive in Oxford being students, 2011 Census), just above the 19.9% South East average.

2.8   Oxford's importance as an employment location is further demonstrated by its job density; the ratio of all jobs to residents aged 16-64. The ratio is 1.08, well above that of the South East (0.83) and Great Britain (0.8). Oxford was relatively resilient to the global recession in 2008/9 but it highlighted the importance of Oxford and the UK economy. With the uncertainty of Brexit it is even more important to strengthen the economy, as set out in the 'Building Our Industrial Strategy' Green Paper.

2.9   The Oxfordshire Local Enterprise Partnership or OxLEP (of which the City Council is a board member) has published the *Oxfordshire Strategic Economic Plan* (refreshed March 2017). This sets out the long term vision and ambitions for economic growth in the county. The overall vision for the *Oxfordshire Strategic Economic Plan* is that by 2030 "Oxfordshire will be recognised as a vibrant, sustainable, inclusive world leading economy, driven by innovation, enterprise and research intelligence."

2.10   The *Strategic Economic Plan* focuses on priority localities of the Oxfordshire Knowledge Spine, which includes Bicester, Oxford and Science Vale. The Plan recognises that Oxford's world-class education research and innovation underpins growth and that continued investment is needed to develop the infrastructure necessary to realise its full potential. The plan states that Oxford city accounts for just under a quarter of the county's population but around 30% of all its jobs.

2.11   *The Oxfordshire Economic Forecasting Report* (2014) was produced by SQW and Cambridge Econometrics to support the *Strategic Housing Market Assessment* (SHMA) and to provide evidence to inform the Oxfordshire *Strategic Economic Plan* (SEP). This included some planned economic growth forecasts for the County and individual districts. The job forecasts

Oxford has a diverse economy being a focal point for education, research and science.

showed an expected increase of 88,200 new jobs within the County as a whole, to 2031, and of these 24,300 new jobs were forecast to take place within Oxford. The *Employment Land Assessment* (detailed below) notes that this Oxford projection has been significantly exceeded to date.

2.12   *The Oxfordshire Innovation Engine* (2013) report was commissioned by the Oxford and Oxfordshire Local Enterprise Partnership together with the University of Oxford. The report seeks to identify ways to realise the growth potential of "Oxfordshire's high tech cluster of businesses, research establishments and support providers". The report recognises that 'Oxford is the service centre for the wider economy, it has the fastest growing, best educated workforce, and it is the main centre of research and spin outs in the County'.

2.13   *The Oxford Economic Growth Strategy* (Oxford Strategic Partnership 2013) developed a clear vision for the future, which at its heart seeks to build on Oxford's strengths to ensure the city continues to make its contribution to the national economy. The productivity and competitiveness of the city is clearly expressed in its contribution to the national economy, Oxford 'contributes £4.5bn to the UK economy, which is the fifth highest GVA per capita of all UK cities. The strategy recognises that "growth needs to be managed carefully to ensure it is sustainable and balanced;" but highlights the opportunities for Oxford with its 'unique combination of factors for business growth' that are not replicated elsewhere, which comprise links and proximity to research excellence that are essential to leading businesses.

2.14   The City Council's *Corporate Plan* recognises that Oxford is the economic and cultural hub of Oxfordshire's world-class knowledge economy and that Oxford is a diverse economy: a global centre for education, health, bioscience, digital and car manufacturing, a lead area for publishing and creative industries and high performance engineering, and a growing high-tech sector. The Corporate Plan also acknowledges the challenges faced by Oxford including a lack of land, shortage and cost of housing a barrier to recruitment and retention and labour shortages.

2.15   Oxford successfully implemented an Article 4 Direction which restricts the loss of Key Protected Employment Sites in the Local Plan 2001-2016 through permitted development rights. This is to protect against changes of use where planning permission is not required on sites that provide an important contribution to Oxford's economy. The Article 4 Direction would continue to protect buildings on these sites from changes from employment uses, although it would not protected against comprehensive redevelopment. In directing that the Article 4 direction should come into force, the government (through the Secretary of State) has recognised the important role that employment sites make in sustaining the quality and diversity of the economy in Oxford and has approved a distinct and locally-specific approach to policy making for the city.

2.16   *The Employment Land Assessment* (2016) states that the total demand for new B1 floorspace is forecast to be between 65,800m^2 and 105,000m^2. The demand for B2/B8 floorspace is between -0.1 ha and 21.9ha. The report concludes that, the demand for B1 floorspace in particular but also B2/B8 use, is well in excess of the current supply. This reflects the findings from previous economic studies and the views of property agents secured through the assessment. The Local Plan 2036 will therefore need to explore how to support existing employment sites; re-evaluate the role and designation of district centres/employment clusters; and encourage the intensification and modernisation of sites.

> **The productivity and competitiveness of the city is clearly expressed in its contribution to the national economy...**

2.17   The SA identified potential positive effects of protecting and encouraging the modernisation and intensification of category 1 and category 2 employment sites. In particular this approach would likely have positive effects in terms of the economy and employment, transport and vibrant communities objectives. The SA also highlighted potential positive impacts on vibrant communities, poverty social exclusion and inequality and education objectives as well as the economy and employment objective.

Responses to first steps consultation:

2.18   Some people thought that businesses should be encouraged to locate and grow in the city, however many respondents raised concerns about this. It was clear that most people felt there needed to be an appropriate balance between employment and housing. A lot of people suggested that Oxford's housing crisis needed to be addressed before more jobs were created. 65% of respondents to the leaflet questionnaire supported the statement: "We build on Oxford's economic strengths".

2.19   The first steps consultation highlighted that there was a broad agreement that employment sites should continue to be protected so that business can grow. There were numerous suggestions relating to employment sites with responses varying from protection to allowing their loss to other uses including housing. There was recognition that some employment sites were needed to support the economy. There was a strong desire to build housing as it was felt by some that increasing employment opportunities would only worsen the affordability issues for Oxford's current and future workforce.

Potential policy responses:

2.20   Protecting Category 1 and 2 employment sites
        It is widely recognised that the shortage of housing in Oxford is a barrier to economic growth. However, the *Oxford Employment Land Assessment* (2016) also identifies the need to provide for additional employment development to meet the forecast demand to 2036. Coupled with the huge housing need, this presents a challenge for this Local Plan. Oxford needs to find an approach so that the barriers to economic growth (e.g. shortage of housing) and the drivers of economic growth (e.g. employment growth) can both be addressed appropriately and without detriment to one another.

2.21   The strategy proposes creating three categories of employment sites with a different policy approach for each:

2.22   **Category 1:** those sites which are important nationally and regionally to the knowledge economy or are significant employers or sectors in Oxford, primarily B1 (office) and B2 (industrial) uses. Provisionally these would be:
        • University/research sites: University of Oxford Science Area; Old Road Campus; Radcliffe Observatory Quarter; Northern Gateway (when developed)
        • Hospital research sites: John Radcliffe Hospital; Nuffield Orthopaedic Hospital; Churchill Hospital; Warneford Hospital
        • Major publishing sites: Blackwells Publishing; Oxford University Press
        • Major manufacturing /research sites: BMW (Mini); Unipart
        • Major Science/Business Parks: Oxford Science Park; Oxford Business Park
        • Larger knowledge – sector office uses: Oxford Centre for Innovation; Nielsen's

> **It is widely recognised that the shortage of housing in Oxford is a barrier to economic growth.**

2.23   **Category 2:** those sites that are important in providing local services and a diverse employment base as identified in the Employment Land Assessment. Provisionally these would be:

Clarendon House, Cornmarket Street	Phoenix Autos, Jeune Street
University Student Hub, Turl Street	Horspath Ind. Estate, Peterley Rd/Pony Rd
Launchpad, Said Business School	Printing works, Crescent Rd
Speedwell House, Speedwell Street	J H Cox Ltd, Builders Yard, 108 Temple Rd
Oxford Business Centre, Oxpens site	Green St. Bindery, 9 Green Street
Pembroke House, 36 Pembroke Street	Builders Yard, Travis Perkins, Cowley Rd
Workshops at 15-17 Edith Road	Bacordo Court, 79-83 Temple Road
King Charles House, Park End Street	The Tyre Depot, Marsh Rd
Fire Station	Magdalen Road and Newtec Place
Becket Street CarPark	One St. Aldates
Oxpens, Oxpens Road	North Bailey House, New Inn Hall Street
Island Site, Park End Street	Thomas Hull House, New Inn Hall Street
Telephone Exchange, St Aldate's	St. Aldate's Chambers, 109-113 St. Aldate's
Police Station	Ramsay House, St. Ebbe's Street
Clarendon Business Centre, Prama House, Banbury Rd	County Hall, New Road
Osney Mead	1-16 King Edwards Street
Clarendon Business Centre, Belsyre Court, Woodstock Rd	Old Rectory, Paradise Square
Oxfam House, 274 Banbury Rd, Summertown	Greyfriars Court, Paradise Square
Garage Repair workshop, 2A off Hayfield Rd	Unither House (Cooper Callas) 15 Paradise Street
Builders Yard Southmoor Road	58,59,60 St. Aldates
Summertown Pavilion 16-24 Middle Way	St. Aldates Courtyard
Jordon Hill Business Park, Banbury Rd	Royal Mail Depot, Kingsmead House
Site at corner of Hayfield Rd & Aristotle Lane	6-7 Worcester Street
Diamond Place and Ewart House	Boswell House, 1-5 Broad Street
Elsfield Way, Elsfield Hall	St. George's Mansions, George Street
Wolvercote Paper Mill	Frewin Chambers Cornmarket Street
Quarry Motoring centre, Green Rd	Blue Boar Court, Blue Boar Street
Warehouses off Kiln Lane, Shelley Close	Park Central, 40-41 Park End Street
Blanchfords Builders Yard, Windmill Rd	276-278 Banbury Rd, Summertown
Tyre and Exhaust centre, 72 London Rd	Suffolk House, 263 Banbury Rd
Former Pickfords, Sandy Lane W/Spring Lane	Lambourne House, 311-321 Banbury Rd, Summertown
Telephone Exchange and offices, St. Luke's Rd/Between Towns Rd	228-240 Banbury Rd
	Offices above M & S, Banbury Road
County Trading Estate Watlington Rd	Mayfield House, 256 Banbury Road, Summertown
Harrow Road Industrial Estate, Watlington Rd	264 Banbury Rd, Summertown
Chiltern Business Centre, Garsington Rd	274 Banbury Rd, Summertown
Nuffield Industrial Estate, Sandy Lane West	Milford House, 1A Mayfield Road
Fenchurch Court, Bobby Friar Close	267-269 Banbury Rd
Blackbird Leys Central Area	285 Banbury Rd
Cowley Centre, Templar's Square	Cranbrook House, 287 Banbury Rd
Littlemore Park, Armstrong Way	Twining House, 280 Banbury Road
Salter Brothers Ltd, Meadow Lane	BBC Radio Oxford, 265 Banbury Rd
Dairy Depot, Old Abingdon Rd	Swan Motor Centre, Between Towns Rd
Car and Exhaust depot, 302 Abingdon Rd	Crown House, 193 Cowley Rd
The Old Music Hall, 106-108 Cowley Road	134A/B Cowley Road
Cowley Marsh Depot	Advice centre, 44B Princes Street
Enterprise Centre, Standingford House, Cave Street	Lloyds Bank, London Rd, Headington

2.24   Category 2 employment sites provide local services and generally include a mix of B1 and B2. These sites have been identified in the *Employment Land Assessment* and been found to be well-performing. They provide a valuable employment contribution and the supporting infrastructure for the larger employment uses in Oxford. These businesses meet local needs and are less likely to be found on Oxford's large employment sites. They may offer skilled manual work and lower skilled jobs which are important to delivering a diverse range of employment opportunities in Oxford.

2.25   Retaining these employment sites for employment-generating uses serves to reduce commuting to work, as well as improving access to local jobs for

different sectors of the community. It is important to protect these sites to encourage opportunities for a diverse range of different businesses and employment but consideration should be given to opportunities to allow some to be developed for housing where strict criteria are met.

Opt 1: Protecting Category 1 employment sites

Policy approach	Consequences of approach/discussion
A) Preferred option: Protect Category 1 sites, promoting modernisation and intensification to allow growth of these businesses and sectors on existing sites. Allow no other uses on these sites, except when they are directly linked to and are necessary to support the main use and there is no loss of employment. Provide a site specific policy framework for each site through an allocation in the Local Plan.	This approach would provide the strongest policy protection for the highest tier of employment sites. It would ensure that important sites underpinning the knowledge economy and significant employers in Oxford are not lost. As employment growth is allowed to continue through modernisation and intensification of sites, other land in the city can be used to address barriers to economic growth (e.g. lack of housing). A detailed assessment would be made to identify opportunities appropriate to the individual site strengths, constraints and land owner aspirations. This could for example identify sites where an element of housing linked to the specific employer could be provided on the site. It is likely that any future review of the Article 4 direction would include all these sites.
B) Alternative Option: Allow residential and other uses to be introduced on Category 1 sites, as long as no net loss of employment floor space results.	This option could erode Oxford's supply of employment land during the plan period; the loss of floorspace is only one aspect of the need to support economic success now and in future. This option could potentially deliver more housing (albeit not necessarily in the best locations for general housing), but it would significantly reduce opportunities for economic growth of these key businesses and sectors. Provision of staff accommodation on the sites for these key employers could assist in recruitment and retention and be an appropriate ancillary activity where it is clearly and formally linked to the employer.
C) Rejected option: Do not protect category 1 sites for employment uses but rely on national planning policy.	In this approach the market would control the future supply of land to meet Oxford's employment demand. There would be no certainty about the city's ability to meet future demand and it would entail the risk that these vital sites would be lost to non-employment uses through redevelopment.

Opt 2: Protecting Category 2 employment sites

Policy approach	Consequences of approach/discussion
A) Preferred option: Protect Category 2 employment sites from loss to other uses, promoting modernisation and intensification. Allow other uses on site only where a set of strict criteria are met. For example, where an employment use is retained with the same or greater number of employees as the previous active employment use. Other criteria could include provision of marketing evidence etc.	This approach provides significant protection for the second tier employment sites in recognition of the important role they play in Oxford's economy and in meeting future economic needs. These sites have been found to be well-performing in the ELA and to provide the diversity of employment opportunities that is one of Oxford's strengths. Whilst the focus is on the encouragement of modernisation and intensification, this approach would allow diversification into other uses on the basis that the level of employment is not diminished. Once lost, it is extremely unlikely Category 2 employment sites could be replaced elsewhere in Oxford hence the need to provide protection against their loss. It is likely that any future review of the Article 4 direction would include all these sites.

B) Rejected Option: Do not protect Category 2 sites and allow redevelopment to other uses.	Lack of any protection for Category 2 employment sites would mean these sites would be very vulnerable to changes of use/redevelopment to other higher value land uses e.g. student accommodation, housing or retail. Once lost, it is unlikely Category 2 employment sites would be replaced elsewhere in Oxford.

2.26 Making best use of Category 3 employment sites

Category 3 employment sites are those currently in employment use but not identified in the Employment Land Assessment. They mainly comprise smaller sites and may not all be performing as well as those in Category 2. These sites may offer an opportunity to explore alternative uses in order to help deliver the aims and strategy of the Local Plan.

Opt 3: Making best use of Category 3 employment sites

Policy approach	Consequences of approach/discussion
A) Preferred option: Allow the loss of other employment sites to alternative uses subject to some basic criteria. This would apply to all employment sites that are not identified under Category 1 or 2; or those that comprise low density B8 use (see separate option below). (Relates closely to options on low density B8 uses below.)	This approach would allow those sites not in Category 1 or 2 to come forward for redevelopment for alternative uses. This would allow additional sites to come forward for housing and other priority uses. Many of these sites are relatively small and are located in areas that would mean they could in principle be redeveloped for housing. Where such sites have been identified they are proposed for further consideration as housing (or other uses) sites in the sites section of the Preferred Options Document. It would be necessary to draft a general policy to embed this approach in the Local Plan. Such a policy would be likely include some basic criteria for assessing compliance of schemes, but for Category 3 sites a lower standard of evidence would be required to support change of use proposals. This approach would mean that these sites would not be subject to an Article 4 Direction in any future review of that regime.
B) Rejected Option: Protect all Category 3 sites (i.e. all sites currently in employment use excluding Category 1 and 2 sites) for their employment uses on the same basis as described above for Category 2 sites.	This approach would provide additional protection for all those sites currently in employment use but not included in the high categories described above. It would in effect be a blanket protection for all employment sites. The benefit of this approach would be that there would be a better supply of employment sites through the plan period, providing greater certainty that the forecast employment needs could be accommodated and that the diverse employment base is reinforced. The disadvantage of this approach would be that some of these sites may be less-well or underperforming in their current use and may offer alternative opportunities to provide much needed housing for example. If all sites were afforded the same protections as Category 2 sites this may sterilise sites and result in missed opportunities to help meet housing (or other identified) needs. The general thrust of government policy would not support a blanket protection approach to all sites.

2.27 Controlling low density B8 uses

B8 warehousing uses can support local employers in sectors such as manufacturing and help to secure a range of job opportunities accessible to a wider range of skill-sets than just the knowledge economy. However they typically have a low job density and high land take on site and do not make efficient use of land which is particularly important given the shortage of land in Oxford. Some B8 uses are essential/important for Oxford (either as part of an existing economic activity by ensuring that important employers are able to contribute to the economy through the jobs they provide e.g. BMW-Mini/Unipart) or by providing essential local businesses in the city. Where B8 is not essential/important for Oxford, this does not represent

the most efficient use of land and could be encouraged to modernise into other employment uses (B1, B2) which have a greater worker density. B8 uses should only be allowed in exceptional circumstances where there is a particular identified need.

Opt 4: Controlling low density B8 uses

Policy approach	Consequences of approach/discussion
A) Preferred option: Allow the loss of B8 to other B1, B2, Sui Generis employment uses and other non-residential uses that support the local economy or are of benefit to the local community. If there is no demand for alternative employment or community uses, consider loss to residential in suitable locations. Protect and allow new B8 uses only where they relate directly to or support existing or proposed Category 1 or 2 employment sites, e.g. warehousing supporting BMW-Mini plant.	This approach improves opportunities for more efficient use of land, higher worker densities and the ability to better meet the employment need as identified in the Employment Land Assessment. It would ensure that those B8 uses that are essential for Oxford are protected and encourages the development of employment sites important to Oxford's economy.
B) Alternative Option: Do not seek to control the development or loss of B8 uses	This approach would mean that opportunities for making more efficient use of sites and improving worker density are missed. It could also lead to further development of inefficient B8 uses that are not essential to be located in Oxford in lieu of other more pressing needs.

2.28   Teaching and research
Hospitals and medical research
Oxford is a major centre for teaching hospitals and home to a cluster of acute and specialist medical organisations which together employ around 14,400 people, or 13% of the total workforce, supporting a further 2,700 jobs. These assets link closely with healthcare research undertaken at the universities. Oxford University's plans to expand medical and clinical research will create more opportunity for discovery and growth. The health sector in Oxford is a catalyst for the wider region's biotechnology sector which comprises 163 companies, of which 49 are based in Oxford. Oxford has numerous strengths in particular biotechnology subsectors, including drug discovery and development, diagnostics, medical technology and imaging.

2.29   Oxford is a world leader in medical research, in identifying causes of disease, improving diagnosis and prevention, and developing effective treatments and cures particularly cancer, stroke, malaria and HIV. Oxford is also an important centre for research into heart disease and musculoskeletal disorders and infectious diseases.

2.30   *University of Oxford and Oxford Brookes University*
The success of Oxford's economy is shaped by the presence of its two growing universities; University of Oxford and Oxford Brookes University.

2.31   The University of Oxford is world renowned and ranked first in the Times Higher Education latest global league table. The University of Oxford has around 12,000 full-time-equivalent employees (not including those employed solely by the colleges or by Oxford University Press, or casual workers).

2.32   Oxford Brookes University is regularly ranked as the best new university in the country, and has earned recognition for the quality of a number of its teaching areas. Oxford Brookes employs just under 2,000 full-time-equivalent staff.

2.33   The two universities have a significant economic impact on the city as employers, buyers of goods and services, host to over 30,000 students and also in terms of the research and development opportunities that they facilitate and inspire. The City Council is committed to supporting the sustainable growth of the two universities and to maximising the related economic, social and cultural benefits to the city.

Opt 5: Teaching and research

Policy approach	Consequences of approach/discussion
A) Preferred option: Hospitals: Continue to protect existing hospital sites for hospital related uses, allowing some diversification.	Oxford has a number of large, established regional hospitals which are major teaching and research centres as well as being healthcare providers. A range of general and specialist treatments are provided and some of these sites are becoming hubs. The established hospital sites are important to the city, and are an important employer, that they should be protected, although it will be important that the policy is flexible and allows the hospitals to diversify, make efficient use of their land and respond to changing needs. The presence of the hospitals benefits the people of Oxford because cutting edge health care is available.
B) Alternative Option: Hospitals: Support hospital related uses in other locations or consolidation of sites if proposals meet certain criteria e.g. more efficient use of land; provide for future needs/modernisation; release land for other uses; improved access and transport links.	The Hospital Trusts may further develop their estate and service strategies later in the plan period so the Local Plan should be flexible to allow changes that would benefit the delivery of health care and medical research in Oxford. It will be important to be flexible to future needs, but potential alternative sites have not been suggested at this point, so sites cannot yet be identified for this use.
C) Preferred option: University of Oxford: Continue to locate academic core activities in central Oxford. Allocate new sites for further academic activities such as teaching research, administration and ancillary activities	The City Council wants to support the sustainable growth of the University of Oxford and its role in the city. The academic, teaching and student accommodation functions of the University of Oxford are currently focussed on a range of sites in and around the edge of the city centre with some (including Old Road Campus) outside the city centre. The University of Oxford is keen to develop the currently protected key employment site at Osney Mead for a range of university related uses; a preferred option for that site is set out in the Sites section of the Preferred Options Document.
D) Preferred option: Oxford Brookes University: Support the growth of Oxford Brookes University through the redevelopment and intensification of academic and administrative floorspace on their existing sites at Headington Hill and Gipsy Lane.	The City Council wants to support the sustainable growth of Oxford Brookes University and its role in the city. Oxford Brookes have in recent years been investing heavily in redeveloping their existing Gipsy Lane site and this is expected to continue on a phased basis. Oxford Brookes have indicated that they are likely to vacate their Marston Road site during the plan period so the preferred option does not include that campus, and it is considered for allocation in the sites section of the Preferred Options Document.
E) Alternative Option: Universities Do not have a specific policy for the universities but rely on other policies of the plan; for example on student accommodation. Deal with site-specific details through site allocations	It may not be necessary to include a specific policy (or policies) on the two universities but to instead express support and rely on the application of the general policies on any proposals they submit. Site allocations can be used to make provision for their needs and to deal with site-specific matters of detail.

2.34   Sites for small businesses and start-up spaces for other employment uses
        (e.g. creative industries, virtual offices)
        There are some 4,585 businesses in Oxford of which the largest proportion
        are micro businesses with 9 employees or less. 85% of the businesses in
        Oxford fall into this category. Small businesses (less than 100 employees)
        make up 11.7% of the total. This is almost double the proportion in
        Oxfordshire and the South East and highlights the importance of Oxford
        as a location and centre of small businesses. We need to provide flexible
        spaces for co-working in suitable locations so that both new and small
        businesses have the opportunity to grow. It is also important to create a
        'pipeline' for the additional supply of office space in the city if Oxford is to
        play its role as a fast-growing city and generate more economic growth.
        Demand is currently outstripping supply in terms of high quality offices in
        the city, this is in part due to the lack of speculative office development
        coming forward from the market.

Opt 6: Sites for small businesses and start-up spaces for other employment uses (e.g. creative industries, virtual offices)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Support the development of start-up and small businesses on all Category 2 employment sites but not on Category 1 sites.	This would allow diversification of Category 2 sites to continue to provide for local services and employment in preference to them being lost to other uses. Would help to provide a range of premises to meet different requirements. Protects those Category 1 sites important nationally and regionally to the knowledge economy and important employers in Oxford.
B) Preferred option (Combination of A + B)**:** Support the development of start-up and small businesses in city and district centres.	Would provide new opportunities for start-up businesses. Would support the enhanced role of city and district centres. Could bring opportunities for new companies that would benefit from town centre locations. Likely to add diversity and variety, and help retain vitality and viability of centres. Would be most likely to support office-based businesses rather than B2/B8. May increase competition for much-needed housing in sustainable locations.
C) Alternative Option: Support start-up and small businesses in any location if other policy requirements (e.g. access) are met.	May increase competition for much-needed housing. Flexibility of location may help to meet a wider range of operation requirements beyond that of office space. A range of site sizes and locations is likely to help meet a variety of premises requirements. Locations may not be close to other employment uses or the right market to help companies flourish.
D) Alternative Option: Do not specifically provide support for these uses, treat the same as other employment uses.	Small businesses and start-ups may find it more difficult to succeed and compete, which could have knock-on effects for other businesses and the wider economy.

2.35   New academic or administrative floorspace for private colleges/language
        schools
        There are different types of private colleges in Oxford which teach a great
        variety of subjects to different age groups. Private colleges may include
        language schools, secretarial colleges and tutorial colleges. While these
        institutions have an educational role to play, and make some contribution
        to the local economy, the further expansion of this sector needs to be
        balanced with other key academic and economic priorities in the city
        particularly where expansion results in loss of other important land uses. In
        particular given the pressure on Oxford's housing stock, change of use from

offices, residential or student accommodation to teaching/administrative and residential uses for private colleges should be resisted.

Opt 7: New academic floor space for Private Colleges/language schools

Policy approach	Consequences of approach/discussion
A) Preferred option: Restrict the expansion of existing language schools, summer schools and independent colleges for over 16s by only permitting further development up to a certain percentage increase, and only subject to clear demonstration of the positive benefits to the local economy. Limit such development to a point that it discourages new entrants to the sector.	It is difficult to view these uses as essential to the operation of the city when they are considered against the key academic and economic priorities. When viewed in the context of the need to find more sites for housing and employment uses, it is difficult to justify loss of suitable sites to private college and language school development. Whilst such colleges generate some employment, these jobs are often not provided at the density of alternative office-type uses and can be seasonal or short-term in nature. A policy approach could provide the opportunity for expansion up to a certain percentage increase on the basis that applicants demonstrate that there are clear positive benefits to the local economy.
B) Alternative Option: Restrict academic floorspace for private colleges and language schools to upper floors in the city and district centres provided no loss of employment, residential or student accommodation.	This option would provide an opportunity for such development, however only in appropriate locations and where other important uses are not lost as a result. It would ensure that opportunities for new academic floor space are in locations that are well-served by sustainable modes of transport. However, it could also mean that the potential is not realised for development in these locations of more intensive uses such as quality office space.
C) Rejected Option: Do not have a policy controlling the development and location of private colleges and language school academic floor space.	This could result in new academic floor space being developed at the expense of other more important uses (e.g. our key academic sectors, housing and employment).

2.36   Opportunities for local employment, training and businesses

Oxfordshire's Strategic Economic Plan identifies that Community Employment Plans (CEPs) have an important role in supporting people to access job opportunities arising from new development. They include employer-led initiatives relating to both the construction phase for all large developments, and the end user phase of large commercial development, and include measures such as apprenticeships and training schemes, local procurement and links with schools and colleges. Other initiatives to help ensure local residents can live free from poverty include the Oxford Living Wage, which is a voluntary scheme whereby employers commit to pay a minimum wage to all staff over 18. This is set higher than the Government's National Living Wage, to reflect the high cost of living in Oxford.

Opt 8: Opportunities for local employment, training and businesses

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Require larger construction projects to ensure that opportunities are given to local firms to realistically bid for work.	This approach would require larger construction projects to formally consider the use of local firms and sub-contractors when letting contracts. For example a requirement could be made for the developer to set a benchmark measure (in co-ordination with the City Council) for the local spend on a project by measuring the spend with each sub-contractor based on their office location and the distance from the site.
B) Preferred option (Combination of A + B)**:** Require larger construction projects to provide training and employment opportunities for local people through a Community Employment Plan.	This approach would require larger construction projects to enter into a Community Employment Plan as part of legal agreement attached to a planning permission. Such plans could include commitment to providing work experience (with linked opportunities for job interviews), visits and workshops for those in construction training and apprenticeships for example. It could require measures of local employment such as a percentage of those construction employees living within set distances of the site for example. This approach would enable monitoring of the effectiveness of such plans.
C) Alternative Option: Do not place requirements on developments to provide training and employment opportunities for local people.	There would be less opportunity and no certainty of achieving local business support and investment in local skills by the development sector without such requirements.

**OXFORD
CITY
COUNCIL**

3. Creating a pleasant place to live, delivering housing with a mixed and balanced community

3.1 *Objectives*
- To deliver as much housing as possible whilst balancing other important needs of the city's residents and businesses
- To deliver affordable housing and ensure that it meets the requirements of those in need
- To plan for an appropriate mix of housing sizes, types and tenures to meet the needs of existing and future residents as far as possible
- To ensure new homes are adaptable to the changing needs of the population and resulting from climate change, as well as being energy efficient to help reduce further climate change

Creating a place to live, delivering more housing

National Planning Policy says:

3.2 The *National Planning Policy Framework* (NPPF) requires Local Plans to support delivery of market and affordable housing to meet the needs of their area, unless this would compromise key sustainable development principles. It sets out what the government expects in terms of the evidence base requirements regarding housing need and supply; this includes a *Strategic Housing Market Assessment* (SHMA) to identify the Objectively Assessed Need; and a *Strategic Housing Land Availability Assessment* (SHLAA) to identify a supply of deliverable and developable housing sites (paragraph 47). The *Planning Practice Guidance* (PPG) supplements the NPPF to give more detail about these requirements.

3.3 The NPPF also requires Local Plans to set policies for meeting the affordable housing need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (paragraph 50). The *Housing & Planning Act 2016* placed significant emphasis on broadening home ownership as a means to address the housing problems. Since then, the *Housing White Paper 2017* has changed the emphasis slightly away from home ownership and towards a wider range of tenures. In particular the *White Paper* proposes to update the government definition of affordable housing to include the following categories (Box 4 of *White Paper*):
- Social rent (guideline target rents determined by government rent policy)
- Affordable rent (no more than 80% of local market rent)
- Starter homes (at 20% discount on market value, for max household incomes of £80,000) and other discounted market sales housing
- Affordable private rent (at least 20% below local market rent)

A strong community

A healthy place

An enjoyable city to live in and visit

A prosperous city with opportunities for all

**Oxford
Local Plan 2036**

3.4 The new definition therefore puts more emphasis than previous national policy on being below market values to rent or buy; however the definition does not link the proposals to people's actual ability to pay those levels so crucially it does not link affordability to local income levels, or explain how homes are kept affordable in perpetuity.

3.5 The government has also introduced a range of incentives in recent years to encourage delivery of more homes, which will also influence the delivery of homes and affordable homes in Oxford, for example: New Homes Bonus, changes to Permitted Development Rights (offices to residential), exempting certain developments from developer contributions towards affordable housing, Starter Homes and changes to Right to Buy.

The Oxford story – background evidence and the Sustainability Appraisal:

3.6 The huge and urgent need for more homes and the constrained supply in Oxford is well documented and frequently features in the press and research studies. The constrained housing supply and increasing unaffordability of homes in Oxford have significant sustainability impacts for those living and working in the City. Housing provision is a well-known key determinant in attracting and retaining people to support continued economic growth of the City, and therefore also impacts the wider region, as does the congestion on roads around Oxford resulting from people living further away from their jobs in the City.

3.7 The main evidence about housing need in Oxford is the *Oxfordshire Strategic Housing Market Assessment* (SHMA) which was commissioned by the six Oxfordshire local authorities. This partnership of the 5 District Councils, and County Council now forms the Oxfordshire Growth Board. The SHMA identifies the overall scale of housing need, as well as the mix of housing and range of tenures which the local population is likely to need in the 20 year period to 2031. It considers household and population projections, taking account of migration and demographic change. It also addresses the need for all types of housing, including affordable housing needs, and the needs of different groups in the community.

3.8 It brings this information together to identify the 'objectively assessed need' (OAN) for each district within the 'housing market area'. For Oxford the OAN is a range of between 24,000 to 32,000 additional new homes required for the period 2011 to 2031 (or 1200 to 1600 per year). For the purposes of the Local Plan the City Council is working to the mid-point of this range (i.e. 28,000). This approach aligns with that taken by the Oxfordshire Growth Board and by the other Oxfordshire Districts in their Local Plans. During the Local Plan 2036 process, some further technical work will be needed to roll forward the SHMA figures from 2031 to 2036, and there are also indications that Government is looking to change the methodology for calculating OAN (*Housing White Paper 2017*).

3.9 This identified need contrasts with the identified capacity for accommodating new housing in Oxford during that time. The *Oxford Housing and Economic Land Availability Assessment* (HELAA) assesses the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. The HELAA estimates the capacity to be 7,511 for the period 2016-2036. In the previous work, the 2014 *Strategic Housing Land Availability Assessment* (SHLAA), a capacity for 10,212 dwellings for the period 2011-2031 was identified.

3.10 It has long been the case that Oxford does not have enough sites to meet its housing needs in full; this has been recognised by Inspectors of the

The main evidence about housing need in Oxford is the Oxfordshire Strategic Housing Market Assessment (SHMA)

previous Oxford Local Plan 2001-2016, and the Oxford Core Strategy. The "minimum figure" in the Oxford Core Strategy of 8,000 homes between 2006-2026 (average of 400 per year) is a constraint and capacity-based target. On average, and taking into account annual fluctuations in completions rates, this target has been largely met with 3,843 (net) cumulative completions in the 10 years since the start of the Core Strategy period in 2006/7.

3.11   The gap between the housing need of Oxford and capacity within the city boundary figures is 'unmet need'. The City Council is working with the other Oxfordshire districts to ensure the overall housing needs of the Oxfordshire Housing Market Area are met in accordance with national policy. The City Council is working with the districts through the Oxfordshire Growth Board to help deliver 15,000 homes in the neighbouring districts by 2031. This is an agreed unmet need allocation, used as a working basis for current local plans in Oxfordshire which will be updated when the Oxford Local Plan is completed. The Growth Board has agreed an apportionment split of how much of the 15,000 is to be met in each district. The City Council is working with the district councils to ensure the apportioned unmet need is delivered through their local plans, and at appropriate locations. Those authorities are at various stages of preparing, or partially reviewing, their local plans to incorporate their allocated portion of the 15,000 homes.

3.12   This *Preferred Options Document* has not set out options for those developments in other districts, because they will be considered through their local plan processes. However it is proposed to set out in the Oxford Local Plan some place-shaping principles for the integration of potential future sustainable urban extensions to the city, located in adjacent local authorities administrative areas. This would help ensure that the urban extensions and their communities are as well integrated into Oxford as they can be both in function and appearance. The City Council will seek to ensure that the affordable housing element of these urban extensions takes into account the needs of Oxford residents, including nomination rights for the allocation of these affordable homes.

3.13   There is not only a shortage of homes in Oxford, but a shortage of homes that are affordable to local people. Buying a home in Oxford costs 16 times the average person's salary, making it even less affordable to buy property than in London. There is a large private rented sector in Oxford and rental levels on the private market are also out of reach for many people so social rented housing (usually at about 40% of market cost) has been playing an important role in meeting needs in Oxford.

3.14   As set out in the SHMA, the estimated annual affordable housing need for Oxford is 1,029 additional affordable homes per year. To meet that need of 1,029 would require a delivery rate of 2,058 homes per year, working on an assumption that 50% of all of those homes are affordable.

3.15   There are currently 3,495 households on the Council's Housing Register for social housing. This is likely to increase during the plan period as the supply of new affordable homes does not keep pace with the increase in need. Of the 7,500 affordable homes in the current stock, only on average 500-600 properties become available to let each year and other properties are being lost from the stock through Right to Buy.

3.16   Key employment sectors in Oxford are already facing significant challenges in recruiting and retaining staff as a result of the lack of access to and availability of affordable housing. Many of these groups of workers may not qualify for social rent but would qualify for intermediate housing

There is not only a shortage of homes in Oxford, but a shortage of homes that are affordable to local people.

options (for rent or sale) such as shared ownership if there were properties available. With such high house prices and private rents in Oxford, it means that even government schemes designed to assist such households with house buying such as the 20% first time buyer's discount and the proposed 'Starter Homes' initiative would still be far out of reach for many key workers, and even further out of reach for those seeking to move on from social rented tenures.

3.17   The *Sustainability Appraisal* highlights the potential positive impacts that could result from meeting as much of the objectively assessed need as possible by boosting housing supply (e.g. vibrant communities, housing, poverty, social exclusion and inequality). It also notes that aiming to meet the OAN in full by further prioritising housing over other policy aims would likely have a significant negative impact on flooding, biodiversity, urban design and heritage, climate change and economy. It will be important to prioritise housing delivery whilst balancing it with other sustainability considerations such as the need for jobs, so that housing should not be prioritised to such an extent that other considerations are unacceptably compromised. The SA further identified the potential positive impacts on a range of the SA objectives that would result from a policy approach that prioritises delivery of affordable housing.

Responses to first steps consultation:

3.17   Delivering housing, the right types, and total numbers, was a topic that received many comments in the consultation from across a range of stakeholders and interests. Comments highlighted that the lack of homes, and unaffordability, are significant concerns to residents and to major employers.

3.18   In terms of overall housing numbers, the responses suggest that providing the right types of homes is as important as providing enough homes. Primarily responses focused on the need for affordable housing, family-sized housing, and key worker housing. There were also some more specific comments about the validity of the *Strategic Housing Market Assessment* and which point within the range of identified housing need (24-32,000 homes) or which growth scenario Oxford should be taking forwards in the Plan.

3.19   Affordability (and unaffordability) of homes was a strong theme in comments, both in relation to key workers (to rent or to buy) and also affordable homes to rent (social rented and options for lower income households).

3.20   Comments were divided on the topic of delivering affordable housing through developer contributions (either on-site provision of homes, or through financial contributions), in terms of what the site size threshold should be, what the percentage requirement should be, and whether the current policies were restricting the supply of new housing or a disincentive to developers because of the potential impact on viability. Some people also suggested that there should be exceptions or different rules for key worker sites and for community-led sites. There was also divided opinion about whom or which jobs should be eligible for key worker affordable housing. There was support for the City Council's new Housing Company and comments identified the potential benefits it could bring in delivering affordable housing.

Delivering housing, the right types, and total numbers, was a topic that received many comments in the consultation from across a range of stakeholders and interests.

Potential policy responses:

3.21 Overall housing target for the plan period

National policy aims to meet objectively-assessed housing needs in full, balanced with other sustainability considerations. The preferred option must also be realistic and deliverable. Oxford's objectively assessed need calculated in the SHMA to 2031 would require a delivery of 1600 homes per year. To proceed with an option that sets a target for 1600 homes per year would clearly be unrealistic within the environmental and physical constraints of Oxford and not a sound policy approach because the evidence indicates that there are not nearly enough sites or unconstrained land opportunities (capacity) in Oxford to accommodate that level of growth.

3.22 It is therefore proposed to continue with a capacity-based approach to planning for homes in Oxford, which will set a target but which should be seen as a minimum to plan for but that can be exceeded in the event that windfall opportunities arise to deliver additional homes in Oxford, for example if a major landowner changes their intentions for a site.

3.23 Present evidence indicates that the physical capacity of the city will be for around 7-8,000 additional homes during the plan period, but further testing of sites is needed to further refine this figure. The capacity will also be influenced by the Preferred Options selected in other chapters of the plan, for example on density, high buildings, Green Belt and protection of green spaces. Adjusting any of those elements could potentially increase the number of homes that could be delivered. There is therefore a balance to be struck as to how far those other sustainability considerations can be flexed to maximise housing delivery, without unacceptably compromising on quality of life, ensuring communities are balanced, and delivering development that is sustainable now and in the future. The capacity will also be influenced by allocating additional sites for residential development up to 2036, whereas currently there are only sites allocated up to 2026.

3.24 With this preferred approach, there is always going to be a proportion of housing needs that cannot be met within Oxford. The City Council is already working in partnership with the other Oxfordshire authorities through the Oxfordshire Growth Board to address its unmet housing needs.

> **The City Council is already working in partnership with the other Oxfordshire authorities through the Oxfordshire Growth Board to address its unmet housing needs.**

Opt 9: Overall housing target for the plan period

Policy approach	Consequences of approach/discussion
A) Preferred option: Set a capacity-based target aimed at meeting as much of the OAN as possible by boosting housing supply balanced with appropriate consideration of other policy aims. Continue to work with adjoining authorities to deliver sustainable urban extensions to meet housing need that cannot be met within Oxford's administrative boundary	Current evidence indicates a capacity of just under 8,000 homes in the 20 year period to 2036 (HELAA). This already includes optimistic assumptions about some sites. This needs further testing to consider the sites in more detail to ensure an appropriate housing land supply could be maintained through the plan period. It may be possible that the sites and capacity identified in the HELAA can be further boosted through various policy adjustments, which are being explored through the local plan review, such as increasing densities, and reviewing Green Belt and the protection of open spaces. The target is therefore likely to be adjusted and refined as further evidence emerges and to reflect policy decisions in other elements of this emerging plan. This option also takes into account the on-going work with adjoining authorities within the strategic housing market area, to positively address needs that cannot be met in Oxford. Currently this is based on a working assumption that around 15,000 homes need to be met outside of Oxford by 2031, agreed by Oxfordshire

	Growth Board (September 2016). Further work will need to be undertaken to understand what this need would look like through to 2036 (the timescale of this plan). The more detailed assessment of sites and capacity through the local plan process will help to refine what the true unmet need figure is that needs to be met outside of Oxford.
B) Alternative Option: Continue current level of provision (400 per year, 8,000 total) (current Core Strategy policy, and average annual provision)	This option is similar to the average level of completions in recent years,. The latest evidence about capacity for the plan period (which does not yet take into account all the possible policy revisions that might be taken forward in this new plan) indicates that this level of provision is likely to be deliverable. To be compliant with the objectives of national policy, all policy options should be explored to see if housing land supply could be boosted further to meet a greater proportion of Oxford's needs in a sustainable manner, for example increasing density, release of greenfield sites, and Green Belt sites. Other policy options in this Preferred Options Document address this point.
C) Rejected Option: Aim to meet the full Objectively Assessed Housing Need for Oxford within Oxford by significantly boosting housing supply and prioritising housing over other policy aims.	The evidence base, in particular the HELAA and before that the SHLAA, indicates that this option would be undeliverable. This would involve setting a housing target of around 1600 dwellings per year or 32,000 in total (as identified in the SHMA) over the plan period. Such a target is highly unlikely to be realistic or deliverable without allocating multiple major strategic scale housing sites, of which there are very few if any in Oxford because of the tight city boundary and environmental constraints. Housing completions over the last 10 years have averaged just under 400dpa which reflects that the majority of housing in Oxford is delivered on small brownfield sites of less than 10 units, and even at the highest rates of delivery have only reached 821pa. Furthermore the capacity calculations are nowhere near 32,000 homes, they are closer to 8,000 homes for the plan period.

National policy aims to meet objectively-assessed housing needs in full; however this is balanced with other sustainability considerations. To proceed with an option for 1600 per year would be unrealistic within the environmental constraints and physical capacity of Oxford.

Setting such a high target (even besides the fact that it couldn't be achieved) is also likely to result in a focus on the number of units rather than the quality or whether the homes are meeting needs or for proper placemaking in the city e.g. are they the right size or tenure for local people's needs. Pursuing the full total at all costs is likely to result in a disproportionate amount of 1-2 bed flats, and fewer family homes. This would make it more difficult to deliver mixed and balanced communities, or to meet the identified needs. It would also mean that very few, or potentially no sites, would be available for other uses including supporting uses that are needed alongside housing to create a sustainable city such as employment, retail, community uses. |

3.25   Affordable housing - proportion of total and provision of tenure types
These options consider two aspects of affordable housing provision: how much affordable housing the plan is seeking to deliver as a proportion of total homes secured from developer contributions; and also which type of affordable housing is the priority i.e. whose housing needs are the focus of the policy.

3.26   Given the assessed need for affordable housing, the City Council will continue to seek to maximise delivery of affordable homes. Viability testing will be required to help define and support the level of affordable housing sought through the policies.

3.27   The preferred policy response seeks to continue to prioritise the housing needs of those who are least able to access homes on the open market and whose only option is social rent. However the current policy balance of affordable housing (80% social rent to 20% intermediate housing) may

not be the appropriate balance to continue because of clear needs from key workers and other sectors, and also wider changes in national policy beyond our control which will affect the successful delivery (and retention) of homes for social rent by the council or registered providers.

3.28 The need for affordable housing is so great, that delivering affordable housing from developer contributions will not be sufficient alone, and these policy approaches to deliver affordable housing from developer contributions will need to work alongside other council-led initiatives (such as the Housing Company), registered providers, and there will also be a role for key employers to play in addressing needs for their staff for example delivering affordable staff housing on development sites.

Opt 10: Determining the priority types of Affordable Housing

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Continue to prioritise delivery of social rented affordable housing, to ensure that the needs of those who can least afford housing in Oxford are prioritised. For example continue the current 80/20 split of affordable housing.	Prioritising social rent over intermediate forms of affordable housing puts the focus on the cheapest types of homes (in terms of rental cost to the resident), as even other forms of affordable rent are likely to be well above the levels of local housing authority rents. This will help to meet needs of people in the most vulnerable categories of the housing register.

However this is likely to disadvantage other sectors of society, those who may have a slightly higher household income but yet for whom market rates are still out of reach particularly to buy in Oxford. This risks polarisation in the housing market, leading to a position where only high income households, or those in the greatest housing need, are able to live in Oxford and households in-between get squeezed out. It may also reduce the opportunity for new emerging tenures such as co-housing or land trust models that seek to ensure permanent affordability through alternative models of delivery.

There are also implications in terms of development viability, because schemes generate less viability from social rent units than they might do from intermediate forms of affordable housing, such as shared ownership. Therefore this option may result in sites being able to support a lower total number of affordable housing units overall.

The success of this option will also be influenced by national policy changes outside of the planning system, such as the changing policy on Right to Buy which has resulted in losses of social rent units in Oxford in recent years, and also welfare reform such as the caps on housing benefits imposed by national policy. |
| **B) Preferred option** (Combination of A + B)**:** In certain circumstances (when meeting employment sector specific needs, delivering a affordable housing in perpetuity and linked to incomes) prioritise the total number of affordable housing units by readdressing the balance between social rent and intermediate forms of affordable housing (which might include affordable homes to rent at no more than 80% of market rates).

(This option relates directly to the "Meeting intermediate housing or employment sector specific needs based on local affordability approaches" option a below.) | It is likely to be possible to secure a greater number of affordable housing units in total if the policy allows more flexibility in terms of tenure mix. In particular a reduction in the level of social rented units required in favour of intermediate tenures would likely have viability benefits and as such allow a greater total number of affordable units.

This option may also help to improve viability of marginal profit schemes, which overall may help to provide more affordable housing. However affordable housing to purchase tends to be more difficult to retain in perpetuity so may not be a long term solution. To mitigate this, the policy could prioritise those forms of intermediate affordable housing which deliver permanent affordability, such as a trust model.

Shifting the balance to put more emphasis on intermediate forms of affordable housing (away from social rent) will help to address the needs of a wider range of households and needs. This will help to deliver mixed and balanced communities by having a wider range of tenures and forms of homes. Although any move away from the focus on social rent will make it even harder to meet the needs of those in the community that are in most housing need and |

	it would take longer for those on the housing register to receive a home. 80% of market rents will be unaffordable to many in Oxford.
	The relationship between the tenure mix and overall percentage of affordable housing will need to be carefully addressed.

Opt 11: Determining the approach to setting the level of the Affordable Housing requirement

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue with current approach to prioritise delivery of affordable housing, requiring a proportion of affordable housing. A robust % target will be set, based on viability testing. Currently, 50% affordable housing is required.	With continuing affordability issues for residents seeking homes to rent or buy on the open market in Oxford, then this option which seeks for the affordable housing target to be as high as viability will allow, is likely to achieve the greatest number of affordable homes and address the greatest needs. There is no evidence that the current approach has negatively affected the delivery of homes, or that sites are stalling as a result of viability, because the policy already includes flexibility to negotiate if the developer has evidence that the requirements would make the scheme unviable. Similar mechanisms would need to apply if taking forwards this policy approach, so as to ensure that the policy requirements do not have a negative effect on housing delivery in Oxford. Equally there is no guarantee that a lesser contribution requirement would deliver any greater number of homes or any faster, because the other constraints remain including a lack of available sites. It is also of note that often when planning applications are presented as unable to support the full contribution of affordable housing, it is because too high a price has been paid for the land or the land value has been over-inflated by 'hope value' rather than other cost elements (such as materials or developer profit). It is not for the public purse to subsidise such investment decisions, or to compromise those in need of affordable housing for the benefit of individual landowners. Further viability testing will be carried out as part of the Local Plan project across a sample of sites to assess if 50% remains an appropriate target.
B) Alternative Option: Consider a reduced affordable housing percentage requirement from developers on a site by site basis if the affordable dwellings were of a size in greatest need in Oxford (i.e. 2+ bedrooms or 3/4 + bedspaces).	This option needs to be considered alongside the options for housing mix (or balance of dwellings). It may be that on some specific proposals, it makes more sense to seek fewer larger units if those would meet an identified need, rather than end up with 1 or 2 bed units which may not meet need but meet targets.
C) Rejected Option: Reduce the overall proportion of affordable housing required, do not seek to maximise affordable housing, and instead focus on delivering other public benefits funded from developer contributions e.g. infrastructure improvements.	This option would deliver less affordable housing. The level of affordable housing need would progressively worsen as the rate of supply would slow whilst the rate of demand would continue unchanged. This approach would likely store up bigger affordability issues to be dealt with in future plans.

3.29   Meeting intermediate housing need to reflect local affordability
These options consider which forms of 'intermediate' affordable housing are likely to be most effective in addressing needs in the Oxford context, for those people that do not qualify for social rent but yet who struggle to afford to rent or buy at market rates.

3.30   Evidence indicates that the relationship between sales values and average salary in Oxford is now such that even with many of the government initiatives that are designed to make homes more affordable, such as

shared ownership and starter homes, home ownership is still out of the reach of many people in Oxford. Therefore these options consider which intermediate tenures are most likely to be accessible to those who are caught between not qualifying for social rent, but who cannot afford to rent or buy at full market prices.

3.31   Government initiatives in recent years have generally prioritised home ownership as an aspiration (although indications in the recent Housing White Paper suggest that this long-held position is now shifting to recognise that home ownership is so far beyond the reach of many people). The extreme unaffordability in Oxford, and the relationship of average salary to house prices mean that many of the purchase options for affordable housing (such as shared ownership, equity loans, and starter homes) are often still not affordable to many people in Oxford. The City Council will carry out an assessment of the affordability of the range of tenures listed in the Housing White Paper to inform the policy approach; this will help ensure that affordable housing is accessible to a wide range of people in need and that homes stay affordable in perpetuity for longer term benefits.

3.32   Historically the badge of 'key worker' has been used to cover many of the people that might fall into this category, and as such the current policy includes a definition of key worker which identifies certain professions or key employers in Oxford, which make people eligible for certain discounted-housing options to rent or buy. However this approach can also exclude many people on lower incomes, and defining a 'key worker' is very subjective. A fairer and clearer policy approach therefore is suggested, to focus the provision of intermediate homes linking eligibility to local incomes and local house prices, which will help to ensure that those homes are targeted to those in greatest need. This is a change from current policy approaches.

3.33   Alongside this another new policy response is suggested, which would support an approach of employers in Oxford who are experiencing recruitment and retention issues to help address the issue by directly providing affordable homes for their staff in the form of staff accommodation or employment-linked homes (occupancy to be secured to staff by legal agreement). If necessary to make this viable, it may be that a reduced requirement of other affordable housing is delivered as part of this, for example if a proposal is providing greater than 50% affordable already.

3.34   This potentially leads to a dual approach position on affordable housing contributions. The standard policy approach would seek the maximum level affordable housing that would be viable (e.g. 50% subject to further viability testing) with a focus on social rent. However, an alternative policy would apply in those circumstances where developers are looking to "over-provide" affordable housing (i.e. exceed the 50% requirement, even going up to 100% affordable); in such circumstances it may be justified to provide a reduced (or even zero) percentage of social rented housing. This alternative policy would allow developers (such as those providing housing for their own employees) to deliver a fully affordable scheme, but with an affordable tenure mix that varies from the norm (e.g. significantly less social rent and more intermediate) in order to support viability. The net outcome for the city would be delivery of more affordable homes overall, but fewer homes available for social rent.

Government initiatives in recent years have generally prioritised home ownership as an aspiration...

Opt 12: Meeting intermediate housing or employment sector specific needs based on local affordability approaches

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C)**:** On specified sites, allow schemes that are up to 100% intermediate housing, with reduced or no element of social rent housing required. This could apply to University and Hospital Trust sites to support key staff; school campus sites, or other staff accommodation schemes.	This option would support some of the major employers in Oxford who own land to help them meet their own housing need and add to the overall supply of housing in the city. This approach would encourage key employers to proactively plan to help to address the housing needs of their own staff. This in turn is likely to help recruitment and retention issues, if they are able to offer housing to their staff. The benefits of the policy are likely to be most positive for employers with land holdings available for development, or who are able to incorporate housing in mixed use development and the ability to finance and deliver employee related housing. However, by exempting developments from provision of/contributing to social rent or other affordable housing, it would exclude and disadvantage other lower-paid workers in need of affordable housing in Oxford. To mitigate this, it would be important that any such policy included mechanisms to ensure that the housing provided would be available as affordable in perpetuity and that the employer's accommodation allocation and rent policy is linked to income levels and affordability across the range of employment roles that support that economic sector, rather than just to a sector or organisation, to ensure that the homes being provided are truly affordable. One way to ensure the homes are and remain truly affordable linked to incomes, is for the employer to agree the allocations priorities/criteria and rent formula with the local authority, and to commit to provide regular monitoring about the rental of the properties. This option may be appropriate for certain sites where the development is providing in excess of the usual affordable housing target e.g. if the scheme is 100% affordable homes with no market housing, then within that it may be appropriate to reduce the usual social rent or other affordable element. The proportion of social rented housing (that will be reduced from 40%) that will be required will be determined following viability testing of the options.
B) Preferred option (Combination of A + B + C)**:** For intermediate forms of affordable housing, prioritise homes for rent, such as affordable rent.	There may be those with aspirations for home ownership who move out of Oxford where market prices to buy are cheaper. Availability of shared ownership is unlikely to change this phenomenon, Affordable homes for rent are more likely (than sale units) to be kept affordable in perpetuity for the longer term benefit to the community. Homes to rent are also more likely to be accessible to a wider range of people (than home ownership) in Oxford due to high prices to buy and the large deposits needed to buy somewhere. So this option is likely to meet a wider range of needs. This option ensures affordable homes remain so in perpetuity, and is also likely to be affordable to a greater range of income levels. Prioritising housing for rent only would also allow homes to potentially be tied to employment or restricted occupancy, which helps to prioritise who the homes go to and helps to protect future supply. There is also the option of tying the homes to income levels with variable rents to reflect circumstances. Emerging changes in national policy are seeking to give longer term security to those renting, which would help make this option more successful in meeting needs.
C) Preferred option (Combination of A + B + C)**:** Have a specific local affordability policy pegged to local incomes and house prices, rather than occupations or employment sectors.	Linking eligibility to local incomes and local house prices, will be fairer and clearer and will help to ensure that those homes are targeted to those in greatest need, as well as focussing on forms of housing that are truly affordable in the Oxford context. For example starter homes as defined in national guidance, are unlikely to be accessible to those on average wages in Oxford, so is not likely to be a truly affordable intermediate option. Other cities including London and Manchester have been exploring this type of approach and the City Council could look to develop this further for the Oxford context.

	A generally-accepted benchmark is that approximately 30% of household income is spent on housing. This suggests that intermediate housing rent or sales values should be aiming for the 1/3 mark.
D) Alternative Option: Take a policy approach that tries to balance affordable homes for rent and affordable homes for sale (such as starter homes, or shared ownership) to give people more choice about intermediate affordable housing options.	This option helps to give people more choices to reflect different aspirations relating to renting or buying homes, and changing personal circumstances. There is already a higher than average proportion of renting in Oxford, and this approach could help to address the current situation where people trying to get onto the housing ladder for the first time are forced to move outside of Oxford because of the lack of affordable options to purchase. There is a practical query about how homes to buy would be retained as affordable housing in perpetuity, which would need to be addressed through the policy.
E) Rejected Option: Continue to support 'key worker' housing as specific sub-category of intermediate housing, defined based on identified sectors/ organisations/roles	This option helps to address the demand for so-called 'key worker' housing alongside providing for people with other housing needs. Current adopted policies support key worker housing contributing up to 20% of the affordable housing requirement, with the remainder to be social rent. Viability and other evidence in the local plan may indicate that this split should be revisited to shift the balance to deliver slightly more key worker accommodation. This option would involve developing an 'Oxford' definition of key workers to identify those who would qualify (and those who would not). The traditional definition refers to professional roles such as teachers, nurses and police, but the essential jobs that support those roles such as cleaners or administrative staff or bus drivers to get those people to work, and who may be even lower paid, may get overlooked in this approach. Alternatively if the scope is broadened then there is a risk that this option would end up including so many people within the definition that it makes it difficult to prioritise the limited supply of homes.

3.35   Providing affordable housing from larger sites

These options consider which proposals and sites will be required to provide on-site affordable housing as part of any scheme. A policy threshold will be required (in terms of site size and number of proposed homes) over which the policy will be triggered.

3.36   Provision of affordable housing on-site is important and preferred because it helps to deliver mixed and balanced communities by delivering affordable housing more widely distributed across the Oxford. Provision on-site by the developer also helps to address the issue of the lack of sites available.

3.37   Further viability testing will be commissioned which will consider the threshold, the percentage of affordable housing and the mix of affordable housing to be delivered on sites. There may also a role for allowing a combination of onsite and offsite contributions or for cross-site offsetting, but this should only be on a case by case basis and the expectation should still be to seek onsite provision; this will be the starting point in any such negotiations.

Opt 13: Providing affordable housing from larger sites

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue to require provision of onsite affordable housing for developments of 10 units or more, or on sites of 0.25ha or greater.	This approach follows current policy and experience has demonstrated that this option is likely most likely to be deliverable and to achieve sustainable development. Further viability testing will be required to help establish the

	target level of provision. Provision of affordable housing on-site helps to deliver mixed and balanced communities by delivering affordable housing more widely distributed across the city, including in the higher value areas. Provision on-site by the developer also helps to address the issue of the lack of sites available.
	Further viability testing is needed to confirm if this is the most appropriate threshold. A threshold of 11 units would be in line with national policy. If density or other design policies such as heights change in the local plan, then the site size of 0.25ha may need to be reduced because more units may then be deliverable on smaller sites.
B) Alternative Option: Do not have a fixed threshold for on-site provision, have a sliding scale, which varies for different site sizes or number of units, so that smaller sites do not require the full provision. For example sites 10-20 units require a lower on-site % provision then sites of 20+ units.	This option allows more flexibility, to achieve onsite provision, similar to the current 'cascade' policy approach to delivering affordable housing on-site. It is a less transparent process to follow and gives less certainty to developers or communities.
C) Alternative Option: Reduce the threshold from 10 dwellings/0.25ha for onsite provision of affordable housing (for example for developments of 8 units or more/0.2ha).	This option may result in more sites being brought forward with on-site affordable housing. However it may put off some developers from bringing forward sites of 8-10 units. This requires further viability testing.
D) Rejected Option: Increase the threshold from 10 dwellings/0.25ha for onsite provision of affordable housing (for example increase to developments of 20 units or more)	If the site size or number of units threshold was to increase, say to 20 units, there would be a significantly fewer number of developments delivering affordable housing on-site, and likely to result in far fewer affordable homes being delivered. For example in the last five years, fewer than five sites per year have been developments of 20+ units, and some years there have been no sites at all of 20+ units.
E) Alternative Option: Allow flexibility to include an element of both onsite and offsite contributions. Consider cross-site provision/offsets.	There is a risk that this option would result in significantly less affordable housing being provided in the high value, more affluent parts of Oxford. Financially developers are likely to choose to off-set the affordable provision on sites in less desirable lower land value areas, or to opt for off-site contributions in order to maximise the sales values on the main site. This will not help to deliver mixed and balanced communities, or to address inequalities across Oxford.
	It is also a less transparent process to follow and gives less certainty to developers or communities.
	However there may be a case for exceptions on a site by site basis, for example where it would result in a better overall design, or for viability reasons, but the starting point should be to look to on-site provision first. Exceptions justified as material considerations can always be considered through the development management process.

3.38   Affordable housing financial contributions from small sites
These options consider the site size or unit threshold which should be used for requiring the financial contributions towards affordable housing from small sites. There is no evidence that the existing policy has negatively affected delivery of sites since it was introduced in 2013, and furthermore small sites make up the large majority of housing applications each year in Oxford and as such have potential to make a significant contribution cumulatively to the aims of delivering affordable housing, alongside other initiatives and policy approaches.

3.39   There has been substantial change and uncertainty in national policy over recent years regarding affordable housing provision from small sites (defined as 10 or fewer units or no more than 1000m² gross internal area). The current position as set out in the *Written Ministerial Statement* (WMS, 2014) and subsequent changes to the PPG, is that affordable housing contributions would normally not be sought from small sites. However case law and guidance from the Planning Inspectorate has clarified that this position does not automatically outweigh relevant development plan policies (such as HP4). Rather, it is for the decision-maker to consider the development plan and the local evidence of affordable housing need, and to use their judgement as to where the balance should lie between local circumstances and the WMS, in determining planning applications. It has also been clarified that local circumstances and evidence may justify having local plan policies with thresholds below those in national policy.

3.40   The City Council has therefore taken into account the WMS in options for the future Local Plan policy approach, as well as the significant and substantial weight to the evidence supporting the need for continuing to seek an affordable housing contribution from small site developments. On balance, the City Council position is that specific local circumstances exist in Oxford related to the need for and provision of affordable housing in Oxford, and exceptional levels of unaffordability, which justify continuing to seek affordable housing contributions from sites of 10 or less dwellings as an exception to national policy.

3.41   Subject to viability testing, it is suggested that the threshold be lowered to two units (currently it is four units). Many of these smallest (2-4 units) developments are exempt from CIL or other contributions, yet they make up a significant proportion of housing delivery in Oxford. Cumulatively the financial contributions that could be achieved could help to deliver new affordable homes alongside other mechanisms for delivering affordable homes. Viability testing will help to identify if this smallest category should contribute at a reduced financial rate from the slightly larger small sites. Also to be explored through further viability testing, is whether there is a better way to calculate the contribution for each site. Currently the calculation seeks 15% of final sales values (GDV) of the development, but in some cases this leads to lengthy negotiations and viability appraisal exercises if the applicant and council cannot reach an agreed position. Alternative approaches could be a flat-rate tariff per unit, or to calculate it by floorspace rather than sales value which would be less open to interpretation and more easily measured similar to the affordable housing contribution from student accommodation developments.

Opt 14: Affordable housing financial contributions from small sites

Policy approach	Consequences of approach/discussion
A) Preferred option: Require an off-site financial contribution towards affordable housing from sites with a capacity for 2-9 dwellings.	The current policy approach seeks contributions from small sites of 4-9 dwellings. There is no evidence that this has negatively affected the delivery of homes or sites, since the policy was introduced in 2013. Viability evidence at that time indicated that most sites of less than 10 homes could make a financial contribution. Many of the smallest developments (2-4 units) are now exempt from CIL or other contributions, yet they make up a significant proportion of housing delivery in Oxford so cumulatively the financial contributions that could be achieved could help to deliver new affordable homes alongside other mechanisms for delivering affordable homes. Viability testing will help to identify if this smallest category should contribute at a reduced financial rate.

	Requiring a contribution rather than onsite provision is often more practical in terms of site design, and also from a management perspective for the Registered Provider. The main limitation with this option is that an increasing proportion of development proposals are exempt from making contributions as a result of government changes, such as office to residential permitted development so it may be limited how often contributions can be collected from these types of developments. If the contribution were to continue to be the final sales value, it is likely to assist the cash flow (and thus viability) for smaller developments and make the contribution less of a burden/more deliverable because it is not fixed at the start, and also because it is not required until later on helping small businesses cash flow. Further viability evidence would be needed to test whether 15% Gross Development Value is still the appropriate target.
B) Alternative Option: Continue to require an off-site financial contribution towards affordable housing from sites with a capacity for 4-9 dwellings.	This option would have the same benefits as the preferred option; however it would continue to apply only to schemes of 4-9 dwellings as at present. A significant number of proposals come forward in Oxford on sites of 2 or 3 dwellings and under this approach those would continue to be exempt from making contributions towards affordable housing. This would mean that (subject to viability testing) potential additional contributions towards would be forgone.
C) Preferred option: Adjust the mechanism of calculating contribution (currently calculated on number of dwellings or site area).Alternatives could be a flat rate tariff per unit, or to calculate the contribution based on floorspace of the development (similar to CIL process).	This option would be simpler and more transparent for developers to apply, and for the local authority to assess at the time of submission of planning applications, in a similar approach to how CIL is currently applied. This could help to reduce lengthy negotiations and give more certainty to developers when analysing viability at the outset. This needs further viability testing to identify which mechanisms and rates could be appropriate and effective for Oxford.
D) Alternative Option: Increase the financial contribution in light of the fact that more small developments are now CIL exempt (starter homes and prior approvals) and so those developments have lower development costs if they are not paying CIL.	As above, except this option would need further viability evidence to see if the market could deliver a higher contribution and what the likely impact would be so as not to present a disproportionate burden which could negatively impact on the supply of homes from small sites, which make up an important element of housing delivery in Oxford each year.
E) Rejected Option: Reduce the level of the financial contribution from small sites, which could include differential levels of contribution depending on the size of development.	A graduated scale of contributions according to development size may help smaller builders/local businesses to bring forward schemes. This could be implemented in a number of ways – number of bedrooms, GDV, floorspace, or site area. This would be a more flexible approach to reflect circumstances of individual developments. Although there are also alternative ways of ensuring the policy is flexible, such as continuing the current 'cascade' approach which allows developers to present open-book viability information if they feel the proposal cannot withstand to deliver the required contributions.
F) Rejected Option: Do not require a contribution for affordable housing from sites of less than 10 dwellings, to encourage small sites to come forward and help small builders/local businesses	This option mirrors the general national policy however there is provision in the national policy for a variation subject to local exceptional circumstances. The City Council maintains that the significant and pressing need for affordable housing in Oxford is justifiably an exception and so continues to apply local policy as an exemption to the Ministerial Statement. Small sites form the majority of housing sites that come forward in the constrained urban area of Oxford. There would be a substantial negative impact on delivery of affordable housing with this option. There is no clear evidence that it would result in increased overall housing delivery rates.

3.42 Contributions towards affordable housing from other development
The affordable housing need in Oxford is so great that all options must be explored for addressing it. As such, the preferred policy response is to seek contributions not only from residential development but also from other types of developments, subject to viability testing. The threshold for the application of the policy and the level of the contribution would need to be carefully considered.

Opt 15: Contributions towards affordable housing from other development

Policy approach	Consequences of approach/discussion
A) Preferred Option (Combination of A + C + E + G)**:** Continue to require financial contributions towards affordable housing from student accommodation developments.	This helps to ensure that student accommodation development is not at the expense of tackling the affordable housing crisis, because often sites which are developed for student accommodation would have also been suitable for residential. Note: this refers to non-self-contained student accommodation units. Self-contained units are subject to the main affordable housing policies. This option will help to increase the rate of delivery of affordable homes across Oxford (as does current policy). Evidence from recent planning applications indicates that student accommodation generates more value than other land uses in Oxford even including C3 residential. As such there is no indication that current levels of contribution towards affordable housing from student accommodation is negatively impacting on delivery of student accommodation. This is subject to further viability testing.
B) Rejected Option: Do not require financial contributions towards affordable housing from student accommodation developments.	This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. If such developments were exempted from contributions then it could further incentivise this kind of development rather than residential which is the highest priority housing form in the city. This impact would be exacerbated as sites suitable for student accommodation are likely to be also suitable for housing.
C) Preferred Option (Combination of A + C + E + G)**:** Continue to require affordable housing contributions from any self-contained units of accommodation within C2 care home/ residential institution developments (e.g. staff accommodation), (either financial contributions or onsite affordable housing provision where appropriate).	If there are self-contained units (C3) delivered as part of a C2 care home/ residential institution development then the usual residential policies should apply (see options earlier in this chapter about onsite and offsite contributions). This is subject to further viability testing.
D) Rejected Option: Do not require financial contributions towards affordable housing from self-contained units of accommodation within C2 developments.	It would not be equitable to exempt self-contained homes from making financial contributions towards affordable housing simply because they form part of a wider C2 development when they would otherwise be subject to the normal affordable housing policies.
E) Preferred Option (Combination of A + C + E + G)**:** Continue to require affordable housing contributions from commercial developments (either financial contributions or onsite affordable housing provision where appropriate).	This option will help to address that new jobs are likely to generate need for new homes by encouraging workers to move to Oxford. As such, it is reasonable to expect such developments to contribute towards meeting the need for affordable housing in Oxford. Currently an indicative threshold of 2000m² is applied, with smaller developments considered on a case by case basis. The calculation is based on the likely number of net new jobs. This is subject to further viability testing.

F) Rejected Option: Do not require financial contributions towards affordable housing from commercial developments.	This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. The link between commercial development and demand for affordable housing provision is well established.
G) Preferred Option (Combination of A + C + E + G)**:** Require affordable housing contributions from purpose-built HMO or non-self-contained C4 developments (either financial contributions or onsite affordable housing provision where appropriate). Would not apply to C3 to C4 conversions.	This helps to ensure that HMO or other C4 development is not at the expense of tackling the affordable housing crisis. Currently this is not a common form of development in Oxford but it may become more popular during the plan period, especially if employers are looking to develop staff accommodation. It is likely that some sites which would have also been suitable for residential may be lost to this purpose, so it is therefore appropriate to seek a contribution towards affordable housing to ensure that such developments are not at the cost of tackling affordable housing issues. Furthermore, if such developments were exempted from contributions then it could skew the market by inadvertently incentivising this kind of development rather than residential. This is subject to further viability testing.
H) Rejected Option: Do not require financial contributions towards affordable housing from purpose-built HMO or non-self-contained C4 developments.	This option would mean securing fewer contributions towards delivery of affordable housing which is a key plank of the Local Plan. If such developments were exempted from contributions then it could further incentivise this kind of development rather than residential which is the highest priority housing form in the city. This impact would be exacerbated as sites suitable for purpose-built HMO or non-self-contained C4 developments are likely to be also suitable for housing.

Creating a mixed and balanced community

National Planning Policy says:

3.43   The NPPF requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. It also compels authorities to identify the size, type, tenure and range of housing that is required to reflect local needs (paragraph 50). Overall the aim should be to create mixed and balanced communities.

The Oxford story – background evidence and the Sustainability Appraisal:

3.44   Generally the mix of dwelling sizes in Oxford differs from the surrounding more rural areas. The mix in Oxford tends to be higher density development and typically smaller homes, with a higher than average proportion of 1 and 2 bed properties at 43%, compared to 34% across the Oxfordshire Housing Market Area (HMA), or 38% across the South East. This reflects the urban nature of Oxford.

3.45   A strong supply of smaller units was leading to a mismatch with the housing needs of the city population, so the City Council adopted a policy approach to steer the mix of house sizes in developments. The Balance of *Dwellings Supplementary Planning Document* (SPD) was published in 2008. The SPD sets out a prescribed mix of dwelling sizes for developments depending on their location and scale. The mix varies for different parts of Oxford but generally the emphasis is towards 3 bed units, to address the need for medium sized dwellings. Housing mix was also considered in the *Strategic Housing Market Assessment* (SHMA Tables 65, 66) which identified a mix not dissimilar from the ranges in the SPD and emphasises the need for 3 bedroom dwellings particularly in market homes.

3.46   Despite the identified need for more medium sized homes, in recent years there has generally been a trend towards provision of smaller houses and flats, in response to market factors and high land values, which mean that

developers may seek to maximise the number of units on a site. Another significant factor that influences the type and size of homes delivered is that many developments in Oxford are small sites including conversions and garden land developments which lend themselves towards smaller sized residential units. In 2014/15 nearly 80% of new homes were 1 or 2 bedroom properties. Even with current policies that seek to steer the housing mix in place, many developments either fall below the Balance of Dwellings policy threshold (the policy only applies to developments of 4 or more dwellings) or are exempt from the current policies because they are developed under Permitted Development Rights or Prior Approval applications. Larger sites, such as Barton Park, remain important in helping to deliver significant numbers of larger properties for families. With very few large sites to accommodate a mix of sizes, and future delivery likely to be reliant substantially on small sites, urban renewal and brownfield infill sites, this trend is likely to continue.

3.47   Oxford has a high percentage of Houses in Multiple Occupation (HMOs). With an estimated 20% of Oxford's population living in an HMO they play an important role in meeting housing needs in Oxford. For many people, they offer a more affordable solution than renting individually or buying a property when prices are so high in Oxford.

3.48   In some areas of Oxford though, the high concentrations of HMOs are resulting in changes to the character of the local area, and can contribute to local parking problems, large numbers of transient households, and the affordability of renting or buying homes in Oxford. This has led some people to believe that their communities are becoming unbalanced because the number of short-term tenants with less-established community ties has increased.

3.49   The City Council through its licencing scheme has a very proactive approach to ensuring that all HMOs are licensed and that these properties are well managed both in terms of the tenants and the potential impacts on surrounding communities. Loss of larger homes, usually to conversions to flats or to HMOs, can help to meet housing needs but can also lead to a shortage of accommodation for families. In 2014/15 applications were approved for 30 new HMOs across Oxford. In the context of increasing house prices, this trend is likely to continue to increase as more people turn to this as a more affordable way to live in Oxford.

3.50   The SA identifies potential positive impacts from including a policy approach that seeks to deliver a range and mix of housing types to reflect the varying needs in the community. It notes the significant role of housing policies in retaining mixed vibrant communities, and diversity, and addressing poverty, social exclusion and inequalities that exist between parts of Oxford.

Responses to first steps consultation:

3.51   The majority of people who responded to the consultation (213) either agreed or strongly agreed that a mix of home sizes (number of bedrooms) should be required through the Local Plan; in comparison 9 people disagreed or strongly disagreed. However a couple of respondents commented that they considered that the current Balance of Dwellings approach is flawed. A number of respondents commented that there should be more flats although the reasons varied from being able to increase density to smaller homes being more affordable and to make sure that larger units are left available for larger families. There were few comments specifically on Houses in Multiple Occupation and those views were mixed.

Oxford has a high percentage of Houses in Multiple Occupation

Potential policy responses:

Opt 16: Mix of dwelling sizes to maintain and deliver balanced communities ('balance of dwellings')

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue to require the mix of dwelling sizes to meet need and prioritise larger units (3+ beds) in key areas.	This option focuses more on delivering the right size or type of homes to meet local needs. This might not result in the greatest number of units on a site, but will be addressing specific local needs and will help to support mixed and balanced communities that the market might not otherwise deliver without such a policy. Evidence (SHMA and housing register) indicate that there is still a significant need for family units, and that typically the market is choosing to deliver much more 1-2 bed homes. 3 bed units may be unaffordable to many people on the open market. The required mix could be set in a Supplementary Planning Document (SPD) or similar. Documents such as SPDs are more flexible to respond to changing needs during the plan period, for example to changes in the housing register.
B) Alternative Option: Do not specify a mix for market homes but specify a mix for affordable homes/the affordable element of mixed developments.	This option would leave it to the market to determine the mix for market units, but specify a mix for affordable homes only. This is particularly important for addressing the needs on the housing resister for social rent and intermediate homes. Having a split approach on sites with market and affordable units will make it more difficult to be tenure-blind for integrated communities.
C) Rejected Option: Do not set a required mix of dwelling sizes and allow the market to dictate provision.	This option is likely to result in housing mixes on sites which deliver the greatest profit return for developers. It is the least likely option to meet local housing needs and to deliver mixed and balanced communities. It is likely to exacerbate the current mismatch between need and supply. The impact of this is likely to vary across different types of sites and locations in Oxford. In some areas it might result in a greater number of smaller units to achieve maximum density. On other, high value, areas it might even result in a reduced density if that makes a greater return (and may be used by developers to by-pass affordable housing provision). Provides the greatest flexibility for site design to respond to context.
D) Rejected Option: Prioritise smaller units (1-2 bed) homes to deliver a higher number of homes towards Oxford's Objectively Assessed Need / urban intensification.	On average there are already a large proportion of 1-2 bed developments being brought forward by the market each year, because sites are typically on very small infill sites or are conversions of existing dwellings, which only lend themselves to smaller units. Over the last 10 years more than 60% of completions each year tend to be 1-2 beds, even in the context of policies to support the delivery of family-sized homes, so taking forward this policy would further exacerbate these trends. Whilst this might deliver more units towards meeting the Objectively Assessed housing Need they would not meet the identified needs of either the housing register or the wider community, and would not support mixed and balanced communities as families would be increasingly pushed to move outside of Oxford.

Opt 17: Thresholds for mix of dwelling sizes ('balance of dwellings')

Policy approach	Consequences of approach/discussion
A) Preferred option: Raise the threshold at which the policy applies; specifying a housing mix only for larger strategic scale developments (e.g. 25+ units).	The current policy applies to sites of 10 units and above in the city and district centres, and has two thresholds of 4-9 and 10-24 units in other areas. The policy is only triggered for a very small number of planning applications per year (usually no more than 10 sites), because so much development in Oxford is on smaller sites, and also some developments are exempted from the policy under permitted development changes introduced by government since the policy was adopted (such as office to residential permitted developments).

	It makes sense to focus the mix policy to influence the larger strategic scale sites where there is more realistic opportunity to shape the dwelling mix towards meeting identified needs, in particular to deliver family-sized homes. In this way, whilst most smaller developments are likely to continue delivering smaller units, the policy can help to ensure that larger sites meet the needs of a wider range of households.
B) Alternative Option: Retain the existing thresholds for site sizes to which the policy applies.	The existing policy applies to sites of 10 units as more in some locations and on sites as low as 4 units in other areas of the city. Despite the relatively low existing thresholds, the policy is only triggered for a very small number of planning applications per year (usually no more than 10 sites). It can also be difficult to achieve a specified mix, or indeed any mix in sizes of homes, on small, constrained infill sites.
C) Rejected Option: Lower the threshold at which a specified mix of unit sizes is required.	Currently the policy applies to sites of 10 units and above in the city and district centres, and has two thresholds of 4-9 and 10-24 units in other areas, so many sites in Oxford do not trigger the policy. However specifying a mix for sites any smaller is likely to significantly constrain design options and may not result in the best place making outcomes because most sites in Oxford are infill and very constrained, or are conversions existing buildings which are even more constrained.

Opt 18: Change of use from existing homes/loss of dwellings

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a criteria based policy that would be used in determining whether development proposals that would result in the net loss of existing homes would be acceptable.	Given scale of the objectively assessed housing need in Oxford it will be important to ensure that the existing stock of homes is protected. This policy permits some flexibility to allow a loss where there are exceptional justifications; for example loss of a dwelling to alternative residential uses such as a care home or student accommodation. Community uses such as a conversion to a children's nursery or a small dentist practice, as well as small home-grown enterprises, also has potential to be converted back to a dwelling again. The priority for any loss of dwellings should be to replace with new residential (for example improved quality of accommodation, or greater number of units), followed by alternative residential uses, followed by community uses. Only if not possible would other options be justifiable in the context of loss of homes.
B) Alternative Option: Include a policy to prevent the loss of self-contained homes to any other use unless at least 75m² residential accommodation remains.	Alongside trying to maximise delivery of new homes, it is also important to protect the existing housing stock, if Oxford is to address its housing need. Continuing this long-standing policy approach to resist the net loss of self-contained homes in Oxford and will help to protect the existing stock. This policy allows some flexibility to introduce small-scale community uses such as childcare provision and small shops, as long as the remaining residential accommodation is of a size which provides good quality residential amenity.
C) Rejected Option: Allow the net loss of self-contained homes to any other use.	With such a high need for housing it is unlikely that any alternative use could justify loss of homes unless the residential units were of substandard quality. Even then the priority is likely to be to replace with new residential.

3.52   Houses in Multiple Occupation play an increasingly important role in meeting housing needs for Oxford residents. Traditionally they have helped to meet student housing needs, but increasingly they are being occupied by young professionals for whom private rental of individual homes or home ownership is unaffordable. If numbers are restricted then this cuts off an important supply of accommodation options for people, and either increases the number of people on the housing register or force more people to move outside of Oxford to find more affordable housing options. However, it is also important to consider how to manage the impact HMOs might have on communities, and to ensure HMOs are decent places to live.

Opt 19: Houses in Multiple Occupation (HMOs)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Allow new purpose-built HMOs in appropriate locations, including employer-provided or staff accommodation.	Purpose-built HMOs could help to reduce some of the potential management issues or neighbourly conflicts, because issues like car and cycle parking and bin storage would be fully addressed at the planning application stage and properly integrated into the design rather than existing buildings having to be adapted or retrofitted.

Purpose-built HMOs in appropriate locations could also help to provide staff accommodation for key employers which have highlighted the issues with recruitment and retention resulting from affordability issues, for example nursing accommodation.

Previously the city council has not been supportive of purpose-build HMOs favouring self-contained homes, however the unaffordability of homes in Oxford is now at such a level where self-contained homes on the private market are now out of reach of many people.

It is less likely that purpose-built HMOs could be converted to single dwelling houses in the same way as traditional HMOs can be relatively easily. |
| **B) Preferred option** (Combination of A + B)**:** Control how and where new HMOs are allowed by setting criteria to control how they are provided and managed and by restricting HMO numbers where there is already a high concentration of existing HMOs. | This option would slow down the increase in current 'hotspot' areas, such as in East Oxford, and encourage development of new HMOs to be spread across more areas of Oxford. This could take a very similar approach as the existing policy of preventing further 'over-concentration' of HMOs in areas where there are already significant numbers, which is usually based on no more than 20% of buildings in HMO use within a 200m length of street. This is also likely to result in continued conversion of family-sized homes to HMOs. Using tools other than the planning system (e.g. City Council licensing for HMOs) to manage HMOs would ensure they are safe and well managed. Planning policies can also ensure that adequate provision is made to address refuse storage/collection, and cycle and car parking, to avoid undue negative impacts on communities. |
| **C) Rejected Option:** Do not restrict numbers of new HMOs or introduce criteria to manage how they are provided. | This option would potentially exacerbate the potential undesirable impacts on neighbours of HMOs, such as parking. This is also likely to result in continued conversion of larger family-sized homes to HMOs. |

Providing accommodation for university students and other specialist housing needs

National Planning Policy says:

3.53   The NPPF says that local authorities should consider development needs other than simply housing and employment. It states that local planning authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community' (paragraph 50). The *Planning Practice Guidance* builds on this stating that: 'Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus… Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation.' However, national planning policy does not say that all students are required to be provided for in purpose-built student accommodation.

The Oxford story – background evidence and the Sustainability Appraisal:

3.54   The Cambridge Centre for Housing and Planning Research was commissioned by the City Council to look at demand and supply of student accommodation. The study includes a baseline analysis of the current structure of the student population, its current accommodation, and the future plans of the different educational institutions.

3.55   The study found that almost three quarters of University of Oxford students (14371) and just over half of Oxford Brookes students (5131) live in university/college maintained student accommodation or private halls. Just under half of Oxford Brookes University's students live in shared houses (4055, 3532 of which are undergraduates). 29% (4333) of the University of Oxford's students live in shared houses, 1585 of these students are undergraduates and 2748 are postgraduates.

3.56   The study looked at expected growth of the two universities, and this is anticipated to be between 1% and 2% per annum at Oxford Brookes, and at the University of Oxford: half to 1% per annum for undergrads and 2% for postgrads. If all students at the two Universities to 2026 were to be accommodated in purpose built student accommodation, this would require 13,467 student additional rooms. If no additional purpose built student accommodation is available to meet future growth, then by 2026 it is estimated that 754 additional existing houses would have to be converted into shared student accommodation to meet demand.

3.57   The study also found that 37% of all students in Oxford are at the various non-university institutions. The institutions that responded to the survey (55% of identified institutions) gave their maximum likely number of students they have on courses at any one time. This added up to 20,892 students, although not all these students will be in the city at the same time. It is estimated that around 11,500 students are on courses that last at least one academic year. It is estimated that about 5,586 students of other educational institutions require accommodation of some form. Of the institutions that responded to the survey, 6 were found to own or long-term lease purpose-built accommodation, with a total number of rooms of 530. A further 1,504 rooms in purpose-built student accommodation are short-leased to these institutions. This includes the use of University accommodation for summer school students during the holidays. Several institutions had plans to increase provision of purpose-built student accommodation. While some of this is off-site accommodation, much of it is within the institutions' main academic sites.

3.58   Another form of specialist housing is older person's accommodation. In 2016 the City Council undertook a review of older person's accommodation in Oxford. The review considered the current provision of sheltered and other housing options for older people aged 55+ in Oxford, alongside the competing needs. It found that there is a total of 1,483 units in the city; this is made up of 382 units of Category 1 (age 55+) accommodation; 877 units of Category 2 (sheltered) accommodation and 224 units in Extra Care schemes.

3.59   The review found that there is a range of sheltered and general needs accommodation provided in the city. It found that the demand and take-up appears to be relatively low, and the waiting list for extra care schemes is relatively short. The review states: "it would appear that the current level of supply in Oxford is generally meeting the current level of demand for this type of accommodation (that is extra care)." One recommendation of the review was that, given the rising life expectancy and quality of health

The study also found that 37% of all students in Oxford are at the various non-university institutions.

in older age groups, that the City Council should focus on accommodating provision of older people aged 75+ and those with significant health needs. This may require the allocations scheme to give preference to those over 75 instead of 55 or 60.

3.60   ORS were jointly commissioned to carry out the Cherwell, Oxford City, South Oxfordshire and Vale of White Horse Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017. This assesses current and future needs for Gypsy, Traveller and Travelling Showpeople accommodation in Cherwell, South Oxfordshire, Vale of White Horse and Oxford City. This used a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community. Because Oxford has no existing sites, there are therefore no waiting lists that can be used to demonstrate demand. Demand can also be measured by assessing whether there are members of the travelling community living in bricks and mortar. There was found to be one travelling household in bricks and mortar in Oxford, but they were considered to be having their needs met. The conclusion is that there is no current or forecast need for sites in Oxford.

3.61   The SA identifies a range of potential positive benefits related to the policy approaches on student accommodation and other specialist housing needs. Making specific policy provision for such needs will help with the sustainability objectives on vibrant communities, housing and education in particular. Focussing the provision of student accommodation to those on courses of a year or more would give access to Oxford's limited student housing supply to those receiving the greatest and longest term educational benefit; and prioritising students of the two universities would assist with the economic aims of the plan in supporting the universities.

Responses to first steps consultation:

3.62   Whilst it was broadly agreed that provision of new student halls can help to reduce pressure on the housing market, many respondents considered that there was already enough student accommodation and thought that housing for the elderly and for hospital staff should be a greater priority.

3.64   There was strong support for prioritising new student accommodation for the two Universities only, although also some objections. Top floors of science parks and out-of-town campuses were mentioned as potential locations for student accommodation.

Potential policy responses:

3.65   Student accommodation
Demand for student accommodation places pressure on the local housing stock, both from students accommodated directly in private rented housing, and also from student accommodation being developed on sites that may equally be suitable for other types of housing. High proportions of students may also result in perceived or actual harmful impacts on communities accommodating those students. Furthermore, the large numbers of foreign language students accommodated in the city during the spring and summer can impact on public transport and the city centre environment.

3.66   It seems appropriate that student accommodation should continue to be provided. However, aiming to accommodate all students in purpose-built student accommodation would conflict with the overall strategy and vision for Oxford, which is to balance different needs and particularly to maximise

There was strong support for prioritising new student accommodation for the two Universities only, although also some objections.

provision of general and affordable housing. Student housing that is either on an existing institution's site or tied to a higher or further education institution will help to support the Universities, while also balancing needs.

3.67 The accommodation needs of undergraduates, postgraduates and staff and those on work placements are all different and should be addressed individually.

Opt 20: Linking the delivery of new University academic facilities to the delivery of University provided residential accommodation

Policy approach	Consequences of approach/discussion
A) Preferred option: Linking new or redeveloped university academic accommodation to the delivery of associated residential accommodation will support those institutions in meeting their own accommodation needs by demonstrating that they have fewer than a set number of full-time taught degree students living outside of university provided accommodation (excluding students studying and working on placements, such as teaching and nursing students and post-graduates on research-based courses). Set the threshold based on existing numbers, potentially reducing across the Plan period and varying between each university.	The threshold would be set to reflect a 2016 base of existing numbers of the types of students the policy would apply to who are living out currently, so start at around 1500 University of Oxford full-time undergraduate and taught course post-graduate degree students and 3500 Oxford Brookes full-time undergraduate and taught course post-graduate degree students. The policy would link to the provision of new University residential accommodation and could include a threshold that reduces over the plan period. Students on full-time taught courses at the two universities are likely to have similar accommodation needs, and similar impacts on the general housing market and on communities Part-time students, students who are also training on work-placements such as teaching and nursing students, and students on research-based post-graduate courses who are also teaching are often playing a more active role in the city. They are also likely to have housing requirements that often will not be met by traditional university-provided accommodation, for example if they have a family or already live in the city. Amending the threshold, and the types of students included in the threshold, and tying new academic growth plan to the associated provision of University provided residential accommodation (to meet University and college needs) will better reflect the current needs of universities and students, and manage the impacts on the housing market. It is not the intention of the policy to prevent growth of the two universities, but to ensure it attempts to meet needs for student accommodation that its proposals create. Therefore, a policy based on realistic targets is a sensible approach.
B) Alternative Option: Continue to restrict new or redeveloped university academic accommodation unless the university in question can demonstrate that it has fewer than 3000 full-time students living outside of University provided accommodation.	The 3000 figure has been in policy for many years. The figure was designed to be an achievable target based on numbers of students living out at the time of the previous (2001-2016) Local Plan and Core Strategy. The number still broadly reflects numbers of students living out, which perhaps suggests the policy has been successful in ensuring stability. However, the policy does not reflect changes that have happened at each of the universities over recent years. There are now a broader range of students, with more part-time students, more post-graduate students, many of whom are also paid for teaching or research, and more students who spend time working out in hospitals for example. Many of these students will have different accommodation needs to full-time students on taught courses. Also, their impact on the community is different. Therefore, the policy approach should be altered to better reflect this.
C) Alternative Option: Continue with the existing policy approach but increase the threshold for Oxford Brookes for a set period of time to reflect current pressures. This approach would apply to all full-time students living in Oxford, so it would include teachers and nurses (unlike option a).	Oxford Brookes has recently increased its nursing students and has aspirations to increase their numbers further. Option A would exclude them from this policy restriction. This option would include them in the policy restriction, but the threshold would be increased from the current 3000 level in order to reflect Oxford Brookes's current position. It would then be lowered over time, to give the University the opportunity to provide for these additional students. This approach acknowledges that student nurses and teachers and others still have an impact on the housing market in the city, and puts the onus on the University to provide for them. It would reduce any current restrictions on them growing and improving their academic facilities, which may have some benefits to the economic and knowledge function of the city. However, this approach does not reflect well the current needs of universities and the changing nature of students

	and their needs. It does not account for the fact that vocational students are often playing a more active role in the city and also have housing requirements that may not be met by traditional university-provided accommodation, for example if they have a family, if they already live in the city and if they will be spending time on placements.
D) Alternative Option: Continue with the existing approach but lower the threshold, for example so that 2000 students can live outside of university provided accommodation.	Reducing the threshold in a sudden policy change could be difficult for both universities to achieve, particularly Oxford Brookes. This would prevent Oxford Brookes from undertaking its planned improvements to its academic facilities, which are likely to be of benefit to the knowledge economy of the city. The provision of significantly more student housing that would be required in the short-term, before academic improvements could take place, would mean that sites would need to be made available for student accommodation, rather than for other uses such including general housing. The benefits in reducing students living out are likely to be outweighed by the negatives. Furthermore, there is no guarantee that there would be interest in a short-term growth in student halls places from students. This approach also does not alter the types of students included in the calculation, so does not reflect the changing needs of the universities.
E) Alternative Option: Do not include a policy restricting new or redeveloped academic facilities if there are more than a certain number of students living outside of university provided accommodation.	This option could allow expansion of the knowledge economy and provide more graduates to contribute to Oxford's workforce. However, it is likely to lead to more students living in private market dwellings, which will affect affordability and availability of general housing, with knock-on effects for businesses. It could also over-stretch transport provision and other services, as students will be less concentrated in particular locations.

Opt 21: New student accommodation

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + E)**:** Focus development of new student accommodation only on allocated sites, existing campuses, in district centres and the city centre. (Sites will only be allocated for this use if they are considered to be in locations as listed, or on radial routes).	This would concentrate new purpose built student accommodation in specific areas, outside of existing communities and close to the academic facilities the students will need to access. Student accommodation is usually located on sites that would otherwise be suitable for housing; given the need to find more sites for housing in the city, limiting the sites for student accommodation would enable more sites to come forward for housing. However, this option may limit the potential for more students to be housed in purpose built accommodation.
B) Alternative Option: Continue with existing policy to allow new student accommodation only on allocated sites, existing campuses, radial routes, in district centres and the city centre.	This would ensure students are located near or in easy reach of facilities. It focuses purpose-built student accommodation in certain areas, helping to protect communities. This option reduces conflict between student accommodation and general residential use on sites. However it would enable more sites to come forward for student accommodation than the Preferred Option.
C) Alternative Option: Relax restrictions on the location of student accommodation by allowing new student accommodation in all locations.	This would mean student accommodation could be provided away from day-to-day services students need, increasing pressure on the transport system. It will also increase competition on sites between student accommodation and general housing. While delivery of student accommodation can release rented accommodation for housing, if it is allowed across the city it could affect delivery of general housing, and affect the make-up of existing communities.
D) Alternative Option: Do not allow new student accommodation (purpose built or conversions).	This option would mean students have to meet their housing needs in the private market, which would increase competition and therefore affect affordability. It would be likely to cause an intrusion of substantial numbers of students into residential communities, which will compromise their distinctiveness and promote animosity.
E) Preferred option (Combination of A + E)**:** Ensure new speculatively built student accommodation is tied to	The University of Oxford and Oxford Brookes University are vital to the economic success of the city and as such the Local Plan sets a clear policy priority on supporting those two institutions. The student background study has shown that

students of the University of Oxford and Oxford Brookes University only.	there is already significant amount of purpose built student accommodation occupied by students at educational institutions other than the universities. This compromises the ability of the universities to house their students, and leads to greater competition in the general housing market. This policy would be worded to ensure that new student accommodation (including that built by private speculative providers) would be limited in occupancy to one or both of the two universities.

This option links directly to the option (in the economy chapter) to restrict the expansion of existing private colleges and language schools. This does restrict some institutions, but other forms of accommodation such as homestay or use of university accommodation outside of term time will be available. Restriction of institutions which are often less well-established in the city is not necessarily a negative in a city with so many competing demands. |
| **F) Alternative Option:** Continue with the existing policy approach to restrict new purpose built student accommodation to those on courses of a year or more. | This option could be seen as more equitable than the preferred option, as it allows greater access to purpose built student accommodation for students from a wider range of academic institutions. However, in a city such as Oxford where land is such a scarce resource with so many competing demands, decisions must be made about how to balance and prioritise these competing demands. The universities are essential to Oxford and to its economy. They do have an impact on the housing market. Of the institutions that responded to survey, 6 were found to own or long-term lease purpose-built accommodation, with a total number of rooms of 530. A further 1,504 rooms in purpose-built student accommodation are short-leased to these institutions. If their academic expansion is to be restricted unless they can provide enough student accommodation then it is sensible that new purpose-built accommodation is available solely to the two universities. Other students will still be able to study in Oxford, using homestays and existing accommodation and accommodation on institutions' existing sites, but their competition with other demands on land and housing will be minimised. |
| **G) Rejected Option:** Do not have restrictions on the occupiers of new student accommodation allowing students of the universities as well as language schools and university preparation colleges to occupy the accommodation. | This policy could support a wide range of institutions in Oxford. However, it would lead to very significant competition for speculatively built new student accommodation. It would severely limit the potential for the universities to house more students in this kind of accommodation. In a city such as Oxford where land is such a limited resource this will have negative impacts on availability and affordability of housing for the general population. Because of their economic importance to Oxford and the value of their human capital to Oxford, and because of the other potential ways to house students at other educational establishments (in the family home, in homestays, in accommodation on institutions' own sites etc.) the needs of the two universities should be prioritised over other educational establishments in this plan. |

3.68   Other specialist housing needs

Travelling communities, older people and boat dwellers may all have particular accommodation needs and should be considered. Options for providing for these groups are explored in this section. Options for accessible and adaptable homes may also be relevant to these groups and these are explored in the section below: Ensuring a Good Quality Living Environment.

Opt 22: Older persons accommodation

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that is generally supportive of older persons accommodation integrated as part of developing mixed and balanced communities.	Although Oxford has generally a younger than average population, there is still expected to be a growth in the elderly population, with the largest growth in the 75+ age range. Oxford is already well provided for in terms of extra-care housing, and it is not anticipated there will be an additional need for sites. However, there are many types of older persons accommodation. Providing suitable facilities that could encourage people to downsize, as part of mixed

	and balanced communities could be of benefit to the housing market overall. The risk would be if elderly persons accommodation was to be provided to an extent it is completely at the exclusion of general market housing. Older persons accommodation would be required to comply with the affordable housing policies in the Plan.
B) Alternative Option: Require older persons accommodation on particular sites if need has been identified for provision on that site.	At present no site in Oxford has been suggested as having a need for older persons accommodation that would require a specific site allocation policy.
C) Rejected Option: Require a proportion of older persons accommodation on all sites over a certain size.	Given the lack of current and projected need in Oxford, especially if measures are taken to manage demand such as changing the allocations policy to give preference to those over 75 instead of 55, this approach seems unnecessarily onerous and of limited benefit and could sterilise a part of a site.
D) Rejected Option: Do not include a policy on older persons accommodation.	Older persons accommodation is expected to become increasingly important with the growth in numbers of older people expected in Oxford, especially those 75+ (even if the proportion is not expected to grow as much as most other areas). There is therefore likely to be demand for older persons accommodation, even if it is private provision, rather than sheltered and extra care facilities. This accommodation could bring potential benefits to people's health and wellbeing, as well as freeing up other housing stock. Therefore, it seems sensible to include a policy relating to this issue.

Opt 23: Accommodation for travelling communities

Policy approach	Consequences of approach/discussion
A) Preferred option: Seek to meet identified need by working with adjoining areas. Allocate any suitable sites identified and set out criteria of suitability.	This approach is NPPF compliant and attempts to identify needs, address any needs in the most appropriate way and also to ensure any proposals are assessed for suitability. A joint study with other Oxfordshire districts has been undertaken, and this has suggested no needs for any sites in Oxford. However, it is considered that criteria for assessing suitability of sites for travelling communities could usefully be included in the Local Plan, in case any sites are proposed during the Plan period.
B) Alternative Option: Do not include a policy on travelling communities.	This means that needs might not be addressed, and also increases the risk of unallocated sites coming forward in unsuitable locations.

Opt 24: Homes for Boat Dwellers

Policy approach	Consequences of approach/discussion
A) Preferred option: Assess need for residential boat moorings and include a criteria based policy for determining planning applications for residential moorings, covering access for emergency services and an assessment of the availability and distance between facilities.	The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2017 will be updated to assess the need for residential moorings. However, it is not expected that, if a need is identified, it will be possible to fully meet that need because of limited capacity. The proposed approach ensures that where proposals come forward they can be properly assessed. Other issues that will need to be considered in addition to the need for moorings are an assessment of the availability and distance between facilities such as water taps, rubbish disposal, chemical toilet disposal and fuel pumps; and access to 'off-side' moorings – i.e. those not on a tow path.
B) Alternative Option: Seek to meet need for residential moorings by allocating sites.	Further clarity is expected from the Government on the definition of 'boat dwellers' and 'houseboats' that should be included in any assessment of gypsy and traveller needs; until that is released, boat dwellers are not included in the assessment. If need is assessed once there is clarity on the definition, it still cannot be assumed that all need can be met through the provision of permanent moorings as many boat dwellers do not seek permanent moorings and navigate waterways on a permanent basis. Furthermore, most areas in Oxford with potential for residential moorings already have moorings, so the potential for further sites is limited.

C) Rejected Option: Do not include a policy on residential moorings.	This approach would mean that there is no specific planning policy basis through which to assess planning applications for residential moorings which would result in a lack of clarity and consistency of approach.

Ensuring a good quality living environment

National Planning Policy says:

3.69   The NPPF is clear that local planning authorities should promote and demand high quality and inclusive design in all developments, including individual buildings and public and private space (paragraph 58). Planning policies and decisions should aim to ensure that developments will add to the overall quality of the area, not just for the short term but over the lifetime of the development. Policies should optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) (paragraph 58). Older people and people with disabilities are also identified as some of the groups that have specific housing needs that should be planned for (paragraph 50).

3.70   The government introduced a new set of optional technical housing standards in March 2015, which can be adopted as policy within the local plan. These include standards for indoor space, and for accessibility and adaptability.

The Oxford story – background evidence and the Sustainability Appraisal:

3.71   Oxford has a huge housing need, and a shortage of available land on which to build new homes. New homes should be of an adequate size and layout so that they are high quality, functional and meet the needs of a wide range of people, and take in to account how those needs might change over time. This should apply to development at all scales, from large strategic sites down to infill development, which represents an important contribution to meeting Oxford's housing need. On any scale of development, ensuring housing is built with adequate privacy, daylight and space (internal and external) helps to ensure the wellbeing of residents.

3.72   It is important to consider the demands and requirements people will have from their homes, and how these will change over the plan period. In particular, addressing how homes can be made adaptable to the changing needs of their inhabitants will be an important consideration. These changes include adaptations in the size and composition of households, the potential for adult children and older parents moving back in to the family home, and an ageing population.

3.73   In 2013, the City Council adopted the Sites and Housing Plan. This included policy HP12 – Indoor Space, which set minimum standards for the internal space required in new flats and houses. With the introduction of the new optional technical standards in March 2015, where a Local Plan already included internal space standards, these were to be interpreted by reference to the equivalent new national technical standard; local authorities could only require compliance with the new standard where there was an existing space standard policy. The new nationally described space standard was adopted and guidance for applying them was set out in *Planning Technical Advice Note: 1A – Space Standards for Residential Development* (2016).

New homes should be of an adequate size and layout so that they are high quality, functional and meet the needs of a wide range of people...

3.74 Oxford City Council's *Review of Older Persons Accommodation* (2016) identifies that there is good range of sheltered and designated 55+ accommodation in Oxford, and even potentially an over-provision. However, there is a recognised demand for housing that enables older people to maintain their independence for longer, so building homes that have the potential to be adapted into accessible homes will help to meet this demand. In addition, there are around 18,000 people (12.4% of the population) in Oxford with long a term health problem or disability. Some of those will need specialist adaptations to their homes, so providing housing that is adaptable will play an important role in ensuring that these people have an adequate choice of homes available to them.

3.75 The SA highlighted how including a suite of policies on living standards (including space standards, privacy and accessibility for example) would have significant positive impacts on a number of sustainability objectives including housing, vibrant communities, Human health and poverty, social exclusion and inequality. The SA identified potential risks that could result from relying on national policies alone and on not embedding the optional national housing standards in the Local Plan.

Responses to first steps consultation:

3.76 Concerns that emerged from the first steps consultation refer to the importance of properly considered waste management; the importance of the size and type of amenity space provided in new developments; and the standards of size and layout for housing. There were comments on the importance, particularly to families, of green spaces within developments, and that the functionality of amenity space is an essential consideration. Whilst some respondents remarked that houses were being built too small, others commented that design and space standards should be more flexible and a number suggested innovative housing options should be considered, including 'capsule' apartment blocks or dormitories for young professionals and short-term visitors, shared building and smaller units.

Potential policy responses:

3.77 Standards for housing and amenity space – quality living accommodation
Quantity must be balanced with quality, and the need to deliver homes must not result in poor quality homes that do not provide adequate living conditions. Indeed the pressure to delivery more homes in a way that makes efficient use of land, means that policy standards to ensure decent living spaces will be particularly important. In order for the delivery of homes to meet the national aim of sustainable development, these homes must be built and designed in such a way that they remain useful for a significant period of time; they must be adaptable to the changing requirements and demographic of residents, and not become obsolete. Policies need to ensure that these high standards of living environment and adaptability are delivered, whilst also providing scope for innovative design and solutions.

Quantity must be balanced with quality, and the need to deliver homes must not result in poor quality homes...

Opt 25: Privacy and daylight

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue with current policy to ensure new residential development provides good privacy and daylight for the occupants of existing and new homes, setting out the factors that will be considered and including the 45 degree guidelines.	This would ensure new development provides adequate daylight and privacy, and does not reduce privacy and daylight in existing development to an unacceptable level. Including the 45 degree guidelines give developers a clear method of assessing this, and set out a transparent approach, but will also leave scope for developers to use other methods to demonstrate that dwellings will receive adequate daylight. The policy could address privacy issues that might emerge in the context of mixed use development.

B) Alternative Option: Continue to require reasonable privacy and daylight, but do not include the 45 degree guidelines or list other details in the criteria.	This could ensure that new development provides adequate daylight and privacy, and does not reduce daylight and privacy in existing development to an unacceptable level. The 45 degree guidelines are well-established; removing them would reduce transparency, and would remove a tool that is useful in assessing daylight.
C) Rejected Option: Do not include a policy on privacy and daylight.	Having no policy means there is more flexibility for design to reflect location and other factors, but this could lead to new development that does not have sufficient daylight or privacy for its occupants, or reduces daylight or privacy to surrounding houses to an unacceptable level.

Opt 26: Housing internal space standards

Policy approach	Consequences of approach/discussion
A) Preferred option: Use the nationally described space standards as the basis for a policy.	The government introduced a nationally described space standard in March 2015. The nationally described space standard replaces existing spaces standards used by local authorities; local authorities now have the option to adopt the nationally described space standards, or have no space standard at all. The space standard can only be applied where there is a local plan policy based on evidenced local need and where the viability of development is not compromised. In summary, the minimum standards include (among others): • 1 bedroom flat: 39m^2 (single bedspace/person) and 50m^2 for a 2 bedspace,one bedroom home • 2 bedroom (2 storey) home: 58m^2 (70m^2 (3 bed spaces) and 79m^2 (4 bed spaces) • 3 bedroom flat: 74m^2 (4 bed spaces) and 95m^2 (6 bed spaces). This should ensure that new developments are designed and built to provide adequate space for occupants. It will be important to ensure that designs maximise the useable space within housing, through functional layout, and provide scope to adapt and modify housing to meet future requirements. The demand for housing in Oxford means that a proportion of larger and family homes will be provided in the form of flats or apartments; ensuring adequate space and quality environments will play a crucial role in changing the perception of apartments and their suitability as family homes.
B) Alternative Option: Do not include a policy on internal space standards.	England currently builds the smallest houses in Europe, on average. Existing policies in Oxford are on the whole less generous than the new national standards (however the Oxford standards are more simple than the new national standards). The increasing pressure to deliver homes, especially in Oxford, where there is a great deal of pressure on a small amount of available land may be justification to consider properties that are less generous than the national space standards. However this could result in housing that is unacceptable in terms of internal space and doesn't offer occupiers the appropriate level of space.

Opt 27: Outdoor space standards

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Require a certain size of outdoor amenity space, and specify requirements for quality in new developments.	This would ensure that outdoor amenity space provided as part of new development was useable and pleasant for the residents. It would be an enhancement to the development, and to the area surrounding the development. It would provide benefit to health and wellbeing of residents. Specifying quality requirements could deliver the greatest resilience to climate change, and minimise flood risk through increased surface water run-off, if requirements specify permeable surfaces and resilient species of tree, for example. This could have benefit to biodiversity. The quality requirements could be specified in the 'Landscape associated with building' policy in 'Creating quality new development'.

B) Preferred option (Combination of A + B): Allow part of the required outdoor amenity space in new developments to be met through provision of shared amenity space.	This could enable more useable outdoor amenity space to be delivered. A larger, shared outdoor space with high quality landscaping, and which receives direct sunlight, may be more useful and beneficial than a small, private balcony, for example. A possible approach could be for this to be combined with option a: shared space could meet the requirement for smaller dwellings, while private outdoor amenity space could be a requirement for dwellings over a certain size. Providing private outdoor space may be more important for larger family units, whilst shared space may by suitable for 1-bed units.
C) Rejected Option: Do not include a policy requiring outdoor amenity space in new developments.	This could result in new development being delivered which does not contain any outdoor amenity space, which would have a negative impact on flooding, biodiversity and the health and wellbeing of residents.

Opt 28: Accessible and adaptable homes

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a policy to implement the "optional technical standards" on accessible homes available through Building Control.	The government introduced an optional Building Regulation requirement in 'Approved Document M: access to and use of buildings' in March. Previously, the Lifetime Homes Standard could be adopted into policy through Local Plans. This standard has now been replaced by the optional building regulation; local authorities can adopt a policy to provide enhanced accessibility or adaptability through Requirement M4 (2) Accessible and adaptable dwellings and/or M4 (3) Wheelchair user dwellings. The optional regulations can only be applied where there is a local plan policy based on evidenced local need and where the viability of development is not compromised. In summary the M4 (2) Accessible and adaptable dwellings requirements includes the following: • Level access (including to outdoor space) • Ground floor WC (with potential for shower) • Features for future adaptation • Wall mounted sockets and switches at above a specified height • Doorways and corridors of a specified width to accommodate wheelchairs The M4 (3) Wheelchair user dwellings requirements includes the following: • Level access (including to outdoor space) • Ground floor WC • Doorways and corridors of a specified width to accommodate wheelchairs • Wheelchair storage and transfer space • Lift (or space allocated for potential for lift) • Kitchen layout to accommodate wheelchair user • At least 1 double bedroom on ground floor close to WC, with turning space, ceiling height to accommodate potential hoist • Accessible bathroom • Wall mounted sockets and switches at above a specified height While the Scoping Report suggests there is good provision of sheltered accommodation for older people, there is not a great deal of choice or flexibility for residents who require accessible housing but who live independently, particularly in the private market. Ensuring that new housing is designed in such a way that it can be adapted to be made accessible will help to provide this choice and flexibility. It will also address the changing requirements of residents over the plan period, as it is projected that Oxford will have a greater proportion of older residents making up its population, and providing opportunities for residents to maintain their independence is very important and can considerably alleviate pressure on health and social care. Ensuring all new homes are adaptable is also a more efficient use of resources, and more sustainable, as a home that is adaptable will have a longer functional life.
B) Alternative Option: Do not include a policy on accessible and adaptable homes.	This could result in homes being built that are not sufficiently adaptable to the changing requirements of residents. This would be an unsustainable approach to building new homes, as they would not be suitable for their residents as their needs change.

4. Making wise use of our resources and securing a good quality local environment

4.1   *Objectives*
- To achieve improved air quality and high levels of energy efficiency, renewable energy provision and water conservation, maximising Oxford's potential in low carbon technologies
- To ensure efficient use of land by seeking opportunities for facilities to be multi-functional, and by maximising efficient use of scarce land
- To manage water flow and to help protect people and their property from the impacts of flooding
- To achieve significant progress towards its net zero greenhouse gas emissions aspiration across Oxford, with the City Council leading by example by continuing to reduce its own emissions and increase its use of renewable energy

Making wise use of our resources to meet Oxford's development needs in the most appropriate way

National Planning Policy says:

4.2   The *National Planning Policy Framework* (NPPF) states that planning should encourage the effective use of land by re using land that has been previously developed (brownfield land), provided that it is not of high environmental value. The NPPF also states that LPAs can consider whether to set a locally appropriate target for the use of PDL and also that they should set out their own approach to housing density to reflect local circumstances (paragraph 111).

4.3   The NPPF states that government attaches great importance to Green Belts; it also states that "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (paragraph 81). Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan (paragraph 83).

4.4   Local authorities must prepare local policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to climate change (Section 19 of the Planning and Compulsory Purchase Act 2004). The NPPF expands on this duty, stating that: "local planning authorities should adopt proactive strategies to mitigate and adapt to climate change (In line with the objectives and provisions of the Climate Change Act 2008) (paragraph 94)." The *Planning Practice Guidance* (PPG) gives examples of policies for

An environmentally sustainable city

A strong community

A healthy place

A centre for learning, knowledge and innovation

mitigating climate change, they include reducing the need to travel and sustainable travel; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon building design approaches.

4.5   The NPPF encourages the use of renewable and low carbon energy and sets out the following in terms of what LPAs should do:
- Have a positive energy strategy to promote energy from renewable and low carbon sources;
- Design their policies to maximise renewable and low carbon energy development, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;
- Support community led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and:
- Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon supply systems and from co locating potential heat customers and suppliers (paragraph 97).

The Oxford story – background evidence and the Sustainability Appraisal:

4.6   Efficient use of land to meet Oxford's needs
Using scarce resources efficiently is vital to ensuring Oxford's sustainable growth and development. Oxford is a small city with a tightly drawn administrative boundary and a growing population. It has a total area of about 46km^2, with parts of the urban area very densely developed. The river corridors of the Thames and Cherwell penetrate as extensive green and blue wedges into the heart of the city. These corridors together with their flood plains form much of the city's 1287m^2 of Green Belt land.

4.7   Oxford has a good record for re-using previously developed land efficiently. Some parts of the city, including town and district centres, are densely populated but nonetheless have capacity to accommodate further residential development sensitively. This approach should as it promotes more sustainable and cohesive communities, and also has a number of positive environmental and economic effects. However, given that previously developed land can only meet a limited supply of Oxford's economic and housing needs, there is a need to look at a range of additional greenfield sites to see if any are suitable to help meet needs.

4.8   Climate Change
The Local Plan should ensure that our fossil fuel derived energy use and CO_2 emissions per capita continue to reduce. Oxford's Sustainability Strategy, Low Emission Strategy and forthcoming Sustainable Energy Action Plan (SEAP) set the ambition to reduce GHG emissions across the city. Oxford's per capita CO_2 emissions were 5.9 tonnes in 2013 and are projected to continue falling and the target to reduce the city's emissions by 40% by 2020 compared to a 2005 baseline is likely to be achieved. The Local Plan should support actions that will support further reductions in CO_2 emissions in order to achieve the 4.8 tonnes per capita emissions target required in 2030 to limit global warming to 1.5°C.

4.9   The Oxford Sustainability Index Report 2016[1] highlights that Oxford, compared to other similar urban areas, performs less well in terms of locally generated renewable energy. Of the approximately 5,500 MWh of locally sourced renewable electricity generated each year, approximately 77%

[1] Oxford Sustainability Index 2016 is available at www. oxford.gov.uk/info/20062/ carbon_reduction_and_ energy_saving/1094/oxford_ sustainability_index_2016

comes from photovoltaics. There remains provision within the Planning and Energy Act 2008 for councils to continue to apply on-site renewable energy policies within Local Plans.

4.10   In 2015 the Government introduced significant changes to energy and sustainability standards in spatial planning. The new national technical housing standards were introduced on 1 October 2015 through Building Regulations. This new system will comprise additional optional Building Regulations on water use and access. The Government's intention is that local planning authorities should not set energy efficiency standards for residential properties. However, renewable energy targets can still be set. Also, the Climate Change Act is referenced in the NPPF as a relevant consideration in decision making, meaning that planning authorities have a duty to shape policy that reduces carbon dioxide emissions.

4.11   In 2016 a heat network feasibility study[2] was jointly been commissioned by Oxford City Council and the University of Oxford with additional funding provided by the Heat Network Delivery Unit at the Department of Energy and Climate Change (now BEIS). The study investigated a number of heat network options for Oxford city centre (including the science area and wider) and the Headington area, connecting a wide range of potential heat and power consumers and a range of baseload supply technologies.

4.12   The SA highlighted how a Green Belt review and release of some Green Belt sites would have a potentially positive impact on several sustainability objectives (notably housing, essential services and facilities and economy and employment) and a potentially negative impact on others (in particular green spaces and water and soil quality). Clearly a measured and balanced approach will need to be taken in drafting these policies. The SA also identified the potential positive benefits of including a suite of policies in the Local Plan on sustainable design, carbon reduction and other sustainable buildings issues. In contrast the SA identified potential risks that could result from relying on national policies alone.

Responses to first steps consultation:

4.13   Use of land
It is clear from the consultation responses received that views were mixed on the idea of a Green Belt review with the possibility of urban extensions. The majority of respondents (282) supported the idea of urban extensions close to Oxford. However, a significant minority of people (111 respondents) were against any development on Green Belt land. Many respondents suggested the City Council should explore a variety of options for increasing housing supply within the city, including removing land from the Green Belt within Oxford, developing taller buildings in some areas, promoting development on previously developed land and considering developing parts of recreational areas that are of poor quality or under-used.

4.14   The issue about allowing some poor quality/under-used green spaces to be partly developed for housing generated a high level of responses with views quite evenly split between those who agreed with this approach (196 respondents) and those who were against it (168).

4.15   Climate change
Regarding on-site renewable energy generation, the majority of respondents agreed that new developments should be required to include renewable installations (181 out of 245 on-line responses). In addition to generally supportive comments, there were some respondents who

considered that on-site renewable energy generation can be ineffective and the focus should be on large scale projects. A number of respondents suggested that the focus should be on energy efficiency of new buildings, and that any new policy requirements should take account of the energy hierarchy (the most practical and cost effective methods to achieve low carbon development). Thames Water recommended a policy requiring new dwellings to incorporate water efficiency measures and a policy which specifically addresses the need for all development to incorporate SuDS.

Potential policy responses:

4.16   Efficient use of land to meet Oxford's needs

Because of the shortage of developable land in Oxford, it is important that options consider the best way to use that land. Focusing development on previously developed land can ensure efficient use of land and tends to concentrate development in areas where it will support facilities and services such as bus routes. Greenfield sites deliver many functions and benefits and are highly valuable, so will generally be protected. However, policy approaches should consider how to identify the greenfield sites with less value that could be suitable for development. This will include Green Belt sites. Sites in Green Belt have been identified that are of low recreational, biodiversity and flood storage value and which have landowner interest in developing the site. An Oxford Green Belt Study has been prepared by Land Use Consultants, which assesses the impact that development on these identified Green Belt sites would have on the integrity of the remaining Green Belt.

Opt 29: Making use of previously developed land

Policy approach	Consequences of approach/discussion
A) Preferred option: Restrict development to previously developed land (with a special focus on developing higher density schemes around transport hubs such as the district centres and the railway station) and specific greenfield sites that have been identified as suitable for allocation.	This approach would deliver more residential and key essential services sites than the other policy options. It would support resisting a piecemeal and ad hoc approach to development. Depending on its implementation this approach may have a number of positive effects, including social and environmental (e.g. it should be easier for larger sites to deliver net biodiversity gain). This approach encourages the redevelopment of underused and vacant sites.
B) Rejected Option: Focus all new development just on previously developed land.	This policy approach would significantly restrict the amount of land for residential and other key essential services. This approach is also likely to restrict opportunities to expand existing educational and other essential services and facilities or to develop new ones. This approach would have a positive impact on biodiversity and green spaces and recreational land.
C) Rejected Option: Allow new development on any greenfield land not protected by other designations such as flood plain.	This approach prioritises the delivery of new development sites for housing and other key essential services over the reuse and intensification of existing sites and the protection of green spaces. This approach would have negative impacts on a number of areas, including biodiversity, climate change, recreational opportunities and historic environment that are critical to the sustainable development within the city. This blanket approach to allowing new development on greenfield land would not be in compliance with the NPPF.

Opt 30: Density and efficient use of land

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a policy requiring that development proposals make the best use of site capacity, in a way that is compatible with both the	This option will require developers to show that opportunities for maximising the development opportunities of the site have been explored. It would enable applications to be refused if they do not make efficient use of land. However, it also acknowledges that proposals should make an individual design response to

site itself and the surrounding area, with building heights and massing at least equivalent to the surrounding area, and bearing in mind that larger-scale proposals will be suitable in many situations.

site specific circumstances and surroundings, and that capacity will be guided by the appropriate use for the site.

Generally a greater intensity of development will be expected on sites with good local facilities and public transport accessibility. This will include the district and city centres, and also will include the main arterial routes in the city and areas around the station, and potentially the new Cowley Branchline stops.

This option relates to the design options in the chapter on "Built environment, heritage and creating quality new development".

Policy approach	Consequences of approach/discussion
B) Alternative Option: Have minimum housing density requirements in all locations.	This would ensure efficient use is made of land, and maximise the potential of new development to meet needs. However, it does not allow an individual response to surroundings, which should be encouraged to ensure good urban design. The suitable minimum density would be too variable depending on the part of the city. In many cases, a density well above that set as a minimum may be suitable, but this may not be explored if policy suggests a suitable density. In other cases, a low density development on a small site may be the best response to surroundings.
C) Rejected Option: Do not include a policy on density and efficient use of land but rely on national planning policy.	This option relates to the design options in the chapter on "Built environment, heritage and creating quality new development". This will mean that developments of a low density could come forward which to not take account of the scarcity of land in Oxford and the need to ensure maximum use is made of that land.

Opt 31: Green Belt

Policy approach	Consequences of approach/discussion
A) Preferred option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites within the city for housing (taking into account other relevant considerations) that are rated as having a 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study 2016, undertaken by LUC. Do not review the Green Belt boundary or allocate sites where the impact would be 'high'.	This approach will mean allocating 8 sites of about 18 hectares in total where development would have a moderate impact on the integrity of the Green Belt. (To put this in context, there is of a total of 1,287 hectares of Green Belt within the city. The city is 4,559.58 hectares in total). It will avoid allocating any sites for development where the impact on the integrity of the Green Belt would be high. It strikes a balance between protecting the integrity of the Green belt and ensuring sites come forward to meet development needs in the city in sustainable locations. As well as the Green belt assessment, all sites would be appraised to ensure they are good locations for development, although generally any site in Oxford is likely to be a sustainable location for new development. This approach would require Green Belt boundaries to be reviewed and amended. Site allocations policies should also mention any other potentially mitigating measures that could minimise any harmful impact on the Green belt.
B) Alternative Option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'low' impact on the Green Belt, as determined by the Green Belt Study.	This approach will ensure very little harm to the overall integrity of the Green Belt. However, given the need for new housing in Oxford, particularly to support the economy and the functioning of the city, further consideration than this should be given to potential development on sites in the Green Belt.
C) Rejected Option: Review the Green Belt boundaries and be predisposed to allocate Green Belt sites for housing (taking into account other relevant considerations) that are rated as having a 'high', 'moderate' and 'low' impact on the Green Belt, as determined by the Green Belt Study.	This approach is likely to have a significant harm to the overall integrity of the Green Belt in Oxford. The important functions, and ultimate aim of the Green Belt to protect Oxford's setting would be significantly harmed.

| **D) Rejected Option:** Do not allocate Green Belt sites for housing. | This would have no negative impact on the overall function of the Green Belt. However, it would also mean that sites where there would be only a moderate or low impact on Green Belt, and which otherwise have minimal recreational, biodiversity and flood storage value, would not come forward to help meet Oxford's significant development needs. This would mean more development would need to be outside of the Green Belt, which could be in less sustainable locations. Many Green Belt locations are in all other ways very sustainable locations for new development as they are in well-connected locations on sustainable transport networks and close to existing facilities. This approach would not be consistent with the approach neighbouring Oxfordshire authorities are taking to Oxford's Green Belt in their own Local Plans. |

4.17   The Green Belt sites considered in the Green Belt Study that are recommended for further consideration as development sites are shown below (note that the Green Belt Study assesses another site, 112b-4, as having potentially moderate impact, but that site is not recommended for further consideration as the landowner has stated they have no intention to develop):
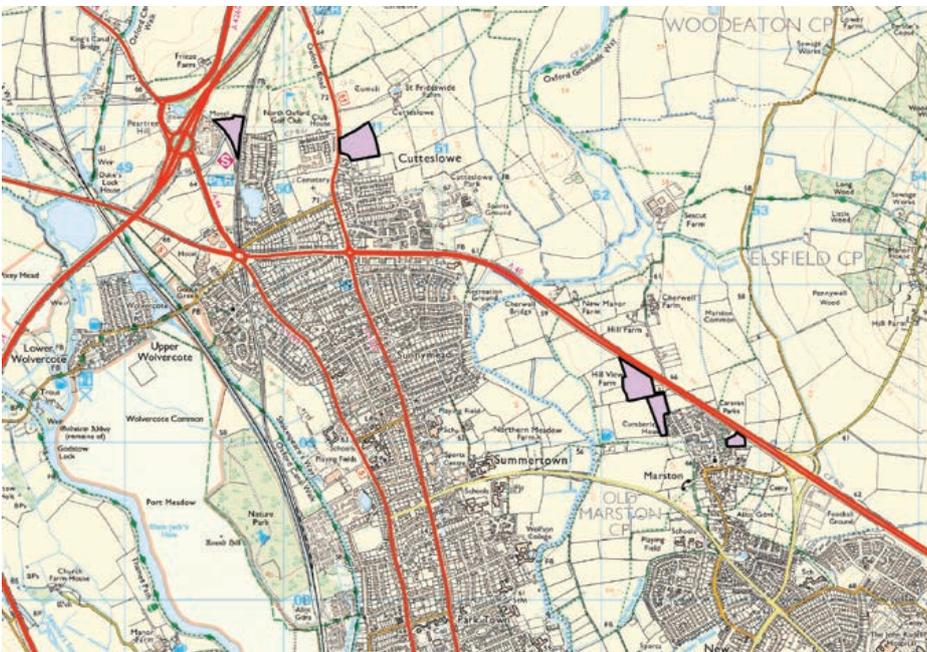
Map 1
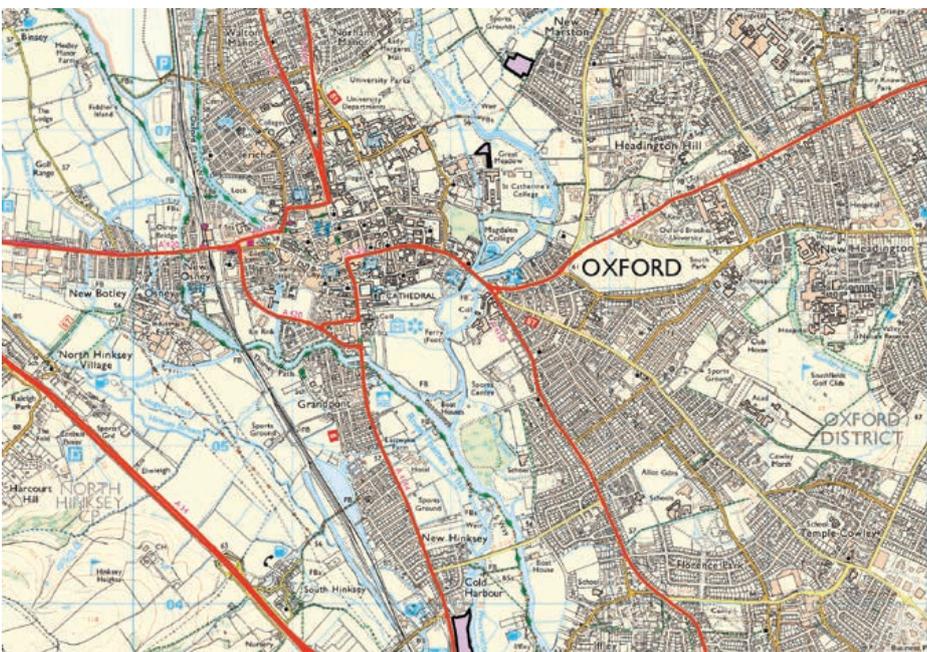
Map 2

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4.18 Climate change adaptation and mitigation

Given the nature of Oxford, renewable energy cannot be derived from large installations of wind turbines or solar panels. Therefore, it is particularly important that each development over a certain size makes a contribution. Energy efficiency and provision of energy from on-site renewable energy can also help to reduce fuel poverty and therefore could help address some of the inequality seen in Oxford.

Opt 32: Energy efficient design and construction

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that has specific requirements for design and construction, including energy performance or carbon emission target standards that exceed current Building Regulations. This policy would set out a number of design principles that would have to be considered by applicants.	As a result of the Housing Standards Review and subsequent changes to the PPG (2015) Local Authorities are no longer able to include in planning policies local building standards relating to energy efficiency, water efficiency or building materials. Instead, the new optional Building Regulations standards (on accessibility, water, waste, and security) can be adopted by a Local Authority via its Local Plan. New Local Plans can set and apply energy performance standards for new homes that exceed current Building Regulations (2013) providing LPAs can evidence need and viability. But Local Authorities are 'not expected' to require energy performance above that required by Code for Sustainable Homes Level 4 (19% above Building Regulations 2013). If the changes to the Planning and Energy Act are brought into effect in future, this ability may be removed (although potentially it is more likely that targets for carbon reduction can continue to be set through Local Plans).This policy approach would help to respond positively to the issues of climate change, but may have some minor adverse impacts on development viability and housing affordability.
B) Alternative Option: Include a generally supportive policy on energy efficient design and construction.	This policy approach is likely to add weight to the overall policy direction of the Local Plan aiming to adapt and mitigate to the impacts of climate change. However, this policy would not respond as strongly as the previous option to issues of climate change. This option should not have any unreasonable adverse impacts on development viability.
C) Rejected Option: Do not include a policy on energy efficient design and construction.	The NPPF and PPG do not require Local Planning Authorities to include such policies in their Local Plans. This policy approach would not have any adverse impacts on development viability, but could possibly have implications on health and wellbeing of future occupants. Absence of a specific policy would weaken the overall policy response to climate change adaptation and mitigation.

Opt 33: Carbon reduction in non-residential development (demonstrated through BREEAM)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Require non-residential development of 1000m² or more to demonstrate carbon reduction by meeting BREEAM outstanding or excellent.	This approach would introduce a simple and effective means of ensuring that most applicable non-residential developments respond positively to climate change. BREEAM is a widely recognised, accredited, independent method for assessing environmental performance of non-residential buildings. The BREEAM standard incorporates a number of climate adaptation measures helping to ensure that new buildings are more resilient to extreme weather conditions. This policy approach would help to contribute to a low carbon economy resulting in new developments being more competitive and responding better to changing economic circumstances.

BREEAM will ensure the best approach to energy efficiency and carbon reduction, which will require attention to the energy efficiency of the materials and construction, and at the higher levels will also require energy provision from low-carbon sources such as on-site renewable energy generation. The policy approach will choose a BREEAM rating to reflect this, taking into account viability testing and other priorities. |
| **B) Preferred option** (Combination of A + B)**:** Require non-residential | This approach will require smaller non-residential developments than currently to submit information relating to carbon reduction. Because of the nature of |

Policy approach	Consequences of approach/discussion
development of 500-1000m² to demonstrate carbon reduction by meeting BREEAM excellent or very good.	development sites in Oxford, there are few larger developments, so reducing the threshold will have a more beneficial effect. Because smaller developments will have less scope to introduce measures to reduce carbon, the BREEAM target suggested, and that is likely to be viable, is lower than for larger schemes. The option will need to be subject to viability testing in conjunction with viability testing of other policy options, before it is drafted into a policy.
C) Alternative Option: Continue with the existing approach to require 20% of total energy demands expected from a development to be met by renewable energy generation.	This policy approach has led to on-site renewable energy installations in many new developments. This is beneficial for carbon reduction and also reduces bills for occupants. However, the ultimate aim of the policy approach is to reduce carbon emissions, rather than to only achieve on-site renewable energy, so a policy that takes a more rounded approach, rather than narrowly focusing on renewable energy, is likely to be beneficial.
D) Rejected Option: Do not include a policy on BREEAM but rely on building regulations.	This approach would rely on the national standards and would not help in creating a proactive strategy to mitigate and adapt to climate change. This approach would not have any implications on financial feasibility of the schemes.

Opt 34: Carbon reduction from residential development (not mutually exclusive)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Include a policy requiring a percentage carbon reduction from on-site renewable energy systems and low carbon technologies from residential development.	This approach would help to deliver more locally deployed renewable energy and low carbon technology, addressing the need to reduce CO_2 emissions and improve air quality in Oxford. The inclusion of a minimum % target for the reduction of carbon emissions in the Local Plan would add clarity for developers and residents. Importantly, it could contribute to reducing poverty, as it would reduce the cost of energy bills for residents, or allow heating to a level required for health and wellbeing. Currently in Oxford policy requires a 20% of total energy needs to be met by on-site renewable energy generation. However, the ultimate aim of the policies is to reduce carbon, so it is clearest and will have the best outcomes if the policy requires it to be demonstrated that a percentage reduction in carbon emissions will be achieved, rather than focusing on energy generation. The expected carbon reduction could be stated either in policy, or in a Supplementary Planning Document. The carbon reduction target will be set a level that will require energy generation from low-carbon sources, such as on-site renewables.
B) Preferred option (Combination of A + B)**:** Reduce the policy threshold down from the current level of 10 dwellings for developments that will be required to meet the carbon reduction target, to apply to all new dwellings.	Most developments in Oxford are smaller developments of under 10 dwellings. This means that few developments are required to incorporate on-site renewable energy technologies. If the threshold were to be reduced this would have a very positive impact on aims to reduce carbon emissions. Reducing the threshold may have an impact on the viability of schemes; it will need to be tested for viability, in particular to ensure it would not have a negative impact on housing delivery.
C) Alternative Option: Continue with the existing approach to require 20% of total energy demands expected from a development to be met by renewable energy generation.	This policy approach has led to on-site renewable energy installations in many new developments. This is beneficial for carbon reduction and also reduces bills for occupants. However, the ultimate aim of the policy approach is to reduce carbon emissions, rather than to only achieve on-site renewable energy, so a policy that takes a more rounded approach, rather than narrowly focusing on renewable energy, is likely to be beneficial.
D) Rejected Option: Increase the policy threshold from 10 to 20 dwellings for developments that will be required to provide a percentage of renewable energy.	This option will lead to fewer new residential developments being built with renewable energy installations. It is likely that a significant proportion of housing completions in Oxford will continue to be from smaller sites and therefore this option could have significant implications on the overall delivery of renewable energy capacity in the city.

E) Rejected Option: Do not include a policy on carbon reduction or renewable energy requirements from residential development.	This option would rely on developers providing on-site renewable energy on a voluntary basis rather than being required by the Local Plan standards to do so. This approach would result in uncertainty in terms of increasing the proportion of local energy generated from renewable and low carbon sources. The option could contribute to increasing poverty as the cost of energy from non-renewable sources is expected to continue to rise.

Under this option new dwellings would likely to produce more carbon emissions and this could have a negative impact on air quality and biodiversity. |

Opt 35: Sustainable Retrofitting of Existing Buildings

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Include a policy supporting appropriate measures to sustainably retrofit existing homes and non-residential buildings. This could include energy efficiency measures, such as internal/external roof, wall or floor insulation.	This option would support renovation/retrofitting of the city's existing housing stock leading to improvements in its energy efficiency and reductions in CO_2 emissions.

For the most vulnerable groups, including those living in fuel poverty, the low-energy refurbishment of homes could help significantly reducing hardship and health problems. In addition, sustainable retrofit investment would be beneficial to the local economy as it generates many types of jobs from high-tech to manual. |
| **B) Preferred option** (Combination of A + B)**:** Include a policy expecting a) proposals for new residential development (10 dwellings or more) involving the refurbishment or change of use of an existing building to achieve a minimum 'very good'/'excellent' rating of the BREEAM Domestic Refurbishment scheme, or an equivalent rating of a similar performance scheme; b) proposals for new major (1000m^2/2,000m^2 or greater) non-residential development, including refurbishment and change of use will be expected to achieve a minimum 'very good'/'excellent' rating of the BREEAM Non-Domestic Refurbishment and Fit-Out scheme, once adopted, or an equivalent rating of a similar performance scheme.

In addition, a policy would encourage whole building/deep energy retrofitting schemes, especially at an area-wide scale. | This option would make it mandatory for any major schemes involving the refurbishment or change of use of an existing building to achieve environmental improvements as required by BREEAM schemes.

This policy approach would lead to more retrofitting projects across the city. However, it should be recognised that the overwhelming proportion of CO_2 emissions in the residential sector is produced by the existing housing stock, which is both large (approx. 55,000 homes) and often relatively energy inefficient; however continuing to reuse existing housing stock is more efficient use of resources than it would be to replace it, even if the replacement were to very high energy efficient standards.

This policy approach will need to be tested for viability to ensure that it did not conflict with delivery of other aspirations. |
| **C) Rejected Option:** Include a policy requiring proposals involving residential and non-residential extensions to apply energy efficient retrofitting measures to the existing property, where practical and feasible, having regard to other policy requirements relevant to the extensions. | This approach would seek to secure energy efficiency improvements to existing buildings where an extension is proposed. Whilst this approach may seem to offer an opportunity to secure improvements to existing buildings, there are likely to be significant issues. This approach would involve the imposition of a planning condition. However, it is likely that any such condition would be legally invalid as it would not relate to the development being permitted. It would not be possible to enforce any such condition – this would fail one of the tests for conditions set out in Circular 11/95. The option of including a policy requiring proposals for residential and non-residential extensions to apply energy efficiency retrofitting measures to the existing property has therefore been rejected. |

| D) Rejected Option: Do not include a policy on retrofitting of existing buildings but rely on national planning policy and other regulatory regimes. | The absence of any specific policy on retrofitting in the Local Plan would not prevent the Council from playing an important role in supporting low carbon initiatives and retrofitting projects in the city. There are a number of existing carbon reduction projects led by the Low Carbon Oxford and the OxFutures which are, and would continue to be supported by Oxford City Council. However, without the local plan policy explicitly supporting retrofitting of the existing building stock there is a risk that fewer opportunities emerge for positive synergistic effects of different carbon reduction initiatives and programmes. |

Opt 36: Water efficiency (residential)

Policy approach	Consequences of approach/discussion
A) Preferred option: Introduce a policy requiring proposals for new residential development to meet the Building Regulations higher optional water efficiency requirement of 110 litres per person per day.	In 2015, following the Housing Standards Review the Government introduced an optional water efficiency standard of 110 litres per person per day in the Building Regulations. This higher optional standard for water efficiency can be applied where there is an evidence based need and local policy to support that need. The area of South East England in which Thames Water operates has been classified by the Environment Agency (EA) as being under serious water stress. The requirements can be applied through planning policy by way of condition attached to planning consents which can be enforced through building regulations. This policy option apart from resulting in better water efficiency would have a number of environmental, social and economic benefits.
B) Alternative Option: Require proposals to incorporate some water efficiency measures, such as water-saving devices, rainwater harvesting etc.	From October 2015 local planning authorities are no longer able to include technical standards in their local plans other than optional standards included in Building Regulations or other national technical standards. National planning practice guidance encourages local planning authorities to consider whether a tighter water efficiency requirement for new homes is justified to help manage demand. This policy option apart from resulting in better water efficiency would have a number of environmental, social and economic benefits.
C) Rejected Option: Do not include a policy on water efficiency.	This option offers no benefits to local residents and the city's environment that are associated with better water efficiency.

Opt 37: Community energy schemes, heat networks and Combined Heat and Power (CHP)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Include a policy supporting community/local energy schemes, heat networks and CHP (or CCHP i.e. Combined Cooling Heat & Power) and explaining how they could contribute to any carbon reduction targets.	CHP is an integrated energy system that provides both electricity and heat. Energy is generally generated from fossil fuels, particularly natural gas, but increasingly renewable energy generation is used. CHP captures heat that is normally wasted. Less fuel is burned to produce each unit of energy and transmission losses are avoided. It therefore reduces emissions of carbon and other air pollutants. This option would have a number of positive social and environmental effects, including providing housing that is sustainably constructed with the reduced cost of energy helping to tackle fuel poverty. This option would contribute to improving air quality in Oxford, by reducing the use of energy generated from non-renewable sources. Also, the NPPF encourages local planning authorities to support opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. Any CHP used in development should comply with the Good Quality CHP standard (CHPQA).

The Council is working with the University of Oxford, Oxford Brookes University and a number of industrial partners to look into heat networks and local energy generation across the city. The Council is currently investigating the feasibility of distributed heat networks around the city centre University science area, Cowley (around the MINI Plant) and the Headington hospital area.

This option responds positively to the NPPF that expects local planning authorities to set out in their Local Plan strategic policies to deliver the provision of energy (including heat).

The development of decentralised energy, and particularly (C)CHP distribution networks, is strongly supported by the NPPF.

B) Preferred option (Combination of A + B)**:** Require new development to connect to a heat network if there is one in proximity.	Heat networks (also known as district heating) supply heat from a central source to consumers, via a network of underground pipes carrying hot water. Heat networks can cover a large area or be fairly local supplying a small cluster of buildings. They can be used to supply new buildings and existing buildings; a wide mix of building types is generally desirable as this provides a diversity of heat demands at different times of the day and year. This is likely to be attractive to developers as it would count towards any carbon reduction target included in policy. This option will help to support the implementation of heat networks and ensure that their potential to lead to carbon reduction is maximised.
C) Alternative Option: Attempt to identify locations suitable for community/local energy generation and heat networks and require it from development on that site/in that area.	The preferred option is to be generally supportive of these types of infrastructure. This option would mean allocating/protecting sites for the provision of these schemes. Although the Council is working with the University of Oxford, Oxford Brookes University and a number of industrial partners to look into heat networks across the city, this is work in progress and suitable locations will vary depending on the nature of schemes proposed and also the changing nature of the infrastructure. Therefore, this option could result in sites being proposed that later turn out to be unfeasible, and other sites may come forward that are not allocated anyway.
D) Rejected Option: Do not include a policy on community/local energy or CHP.	This option would not contribute to increasing the % of energy generated from renewable resources and improving air quality in Oxford. Indirectly, it is also not contributing positively to biodiversity.

Securing a good quality local environment

4.19 Flooding and drainage
The NPPF suggests that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change, taking account of flood risk and water supply considerations. NPPF flooding policy seeks to direct development away from areas at highest risk, and where development is necessary, to make it safe without increasing flooding elsewhere (sequential and exception tests). The NPPF requires that Local Plans should be supported by a Strategic Flood Risk Assessment and include policies to manage flood risk from all sources (not just flooding from rivers but also including groundwater flooding for example), taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as Lead Local Flood Authorities (in Oxford's case: Oxfordshire County Council). The NPPF requires Local Planning Authorities to have appropriate policies in place to support use of sustainable drainage systems (paragraphs 100-103).

4.20 Health
The NPPF states that "the planning system can play an important role in facilitating social interaction and creating health, inclusive communities" (paragraph 69). The PPG states that: "Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local plans and in planning decision making." There is an established link between planning and health as both the built and natural environments are major determinants of health and wellbeing. The PPG is clear that a wide range of planning policies have a positive impact on health and mitigate the negative health impacts of proposed developments. Such policy approaches include providing for healthy lifestyles, dealing with environmental hazards and providing health infrastructure.

4.21 Air quality
Action to manage and improve air quality is largely driven by national legislative context. The 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter and nitrogen dioxide. The NPPF requires that Local Plans include policies to assist in compliance with these limits (paragraph 124). The PPG recognises that Local Plans can affect air quality in a number of ways, including through what development is proposed where, and the encouragement given to sustainable transport. The PPG states that Local Plans must take into account designated air quality management areas and their associated air quality action plans.

> **Action to manage and improve air quality is largely driven by national legislative context.**

4.22 Noise, light pollution and nuisance
The NPPF (paragraph 123) and PPG state that planning policies should avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development; not place unreasonable conditions on existing businesses because of changes in nearby land uses since they were established; identify and protect areas of tranquillity. In terms of lighting, the NPPG states that encouraging good design should limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation

4.23 Land contamination
The NPPF (paragraph 120) and PPG establish that Local Plans have a role in considering contamination in several ways: that land affected by

contamination should only be allocated for appropriate development; they should have regard to possible impact of land contamination on neighbouring areas; and be clear on the role of developers.

The Oxford story – background evidence and the Sustainability Appraisal:

4.24   Flooding and drainage
Significant areas of Oxford are at risk of flooding. Large parts of the built-up areas in South Oxford, West Oxford and Lower Wolvercote currently have a 1% or greater annual risk of flooding (Zone 3). In addition, large parts of the undeveloped flood plains of the Thames and Cherwell regularly flood. The principal source of flood risk in Oxford is from our rivers. The most recent flood events in Oxford were in January 2014, November 2012 and July 2007 and they resulted in significant disruption. Climate change is likely to increase the areas at risk of flooding, as well as the frequency and severity of floods. New development has the potential to interfere with existing drainage systems, decrease floodplain storage, reduce permeable surface areas and increase the volume and speed of runoff through a catchment, ultimately leading to significant changes to river catchment characteristics and subsequently increase food risk.

4.25   A new *Strategic Flood Risk Assessment Level One* (December 2016) has been carried out for Oxford as part of the Local Plan project and is published alongside this document. The SFRA Level 1 concludes that a considerable proportion of Oxford is at some risk from flooding; this is predominantly fluvial flooding from the rivers but there is also some flood risk to properties from other sources including surface water, sewer and groundwater flooding. The SFRA suggests policies on the requirement of Flood Risk Assessments for development proposals and in relation to the NPPF's sequential approach. The Oxford flood alleviation scheme is going through initial planning stages. The SFRA Level 1 notes that the Oxford Flood Alleviation scheme will help convey water away from development infrastructure and will reduce flooding in the areas of greatest flood risk. The Local Plan can introduce a number of other measures that could play an important role in reducing the risk of flooding.

4.26   Sustainable urban drainage systems (SuDS) can be used to manage surface water flows and are an important tool in minimising flood risk. SuDS can fulfil various other green infrastructure functions such as improving filtration and habitat creation, helping control pollution and enhancing biodiversity.

4.27   Air Quality
An Air Quality Management Area (AQMA) is designated where defined air quality standards and objectives are not being met. The City Council declared an AQMA for central Oxford in 2003. This was expanded in 2005 and following further detailed assessments of air quality, a city-wide AQMA was declared in September 2010. The City Council produced an Air Quality Action Plan (AQAP)[3] to address the issues of the AQMA. This proposes a range of measures that will be required to reduce emissions across Oxford. The AQAP addresses the integrated approach to air quality and carbon emissions by setting reduction targets for air pollution and carbon emissions from road transport. A low emission zone was introduced in the city centre in 2014 to encourage use of cleaner, greener vehicles.

[3] More information on AQMA and AQAP is available at www.oxford.gov.uk/info/20216/air_quality_management/206/air_quality_management_in_oxford

4.28   Noise, Pollution & Nuisance
One of the key objectives of sustainable development is to minimise pollution. This refers to minimising the harm to human health and the environment from noise, light, vibration, effluent, fumes or odour and

other types of pollution. The City Council will need to be satisfied that proposals for development will not have unacceptable environmental impacts.

4.29   Land Contamination
In 2014, the City Council produced a Land Quality Strategy[4]. This Strategy seeks to ensure that Oxford's residents and natural environment are not exposed to unacceptable risks from land contamination and to improve our environment for a sustainable future. It recommends that land contamination is taken into account when developing planning policy documents.

4.30   Oxford's industrial history has resulted in a substantial amount of land affected by contamination. Almost all of the major former industrial sites have been remediated and redeveloped, such as Lucy's in Jericho and the former British Leyland car factory site in Cowley. However, there remain a significant number of smaller sites that may still have the potential to be affected by contamination. Other sources of contamination in Oxford include former landfill sites and areas near a water source that have been raised (potentially with contaminated materials) to avoid flooding, and made ground. Made ground is ground made up of artificial fill. Large areas of Oxford contain made ground at varying depths. The source of the made ground is generally unknown and often contains contaminants of concern.

Responses to first steps consultation:

4.31   The majority of respondents on flooding commented that the Local Plan should restrict development on floodplain and consider how development of green spaces will affect flood risk. Some respondents suggested that homes on stilts could be allowed on the floodplain.

4.32   Traffic pollution was viewed as the major issue affecting human health and quality of life. The majority of respondents (162 out of 249) to the online questionnaire supported the idea of more restrictive emissions zones in Oxford. Some respondents pointed out that air pollution needs to be minimised to encourage cycling. Some commenters supported the idea of a congestion charge. Natural England said that the Plan should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. Oxfordshire County Council endorsed the implementation of a city centre Zero Emission Zone as a further solution to reduce air pollution. Some stakeholders (Oxford Civic Society, Oxford Friends of the Earth and University of Oxford) suggested that more restrictive emissions zones should be introduced progressively. Oxford's two major bus operators said that the greatest short-term improvements in air quality would be achievable through addressing tailpipe emissions from taxis and private hire vehicles, and goods vehicles.

Traffic pollution was viewed as the major issue affecting human health and quality of life.

Potential policy responses:

4.33   Flood risk and drainage
Oxford's location at the confluence of two rivers means that flood risk is a significant issue. National policy requires that Strategic Flood Risk Assessments are undertaken in order to identify the parts of Flood Zone 3 (at 1/100 risk of flooding or greater) which are functional flood plain (Flood Zone 3b). The Local Plan should set policies relating to these Flood Risk Zones. The need for development and the fact that Oxford is an accessible and sustainable location means that consideration should be given to how policies could mitigate potentially negative effects of developing in areas at risk of flooding.

Opt 38: Flood risk zones

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Include a policy that allows only water-compatible uses and essential infrastructure in undeveloped parts of flood zone 3b (the functional floodplain), and applies the sequential test for developments in other flood zones (in-line with NPPF guidance). Include a requirement to reduce or not increase run-off.	This approach is designed to reduce the risk of flooding and its impacts on people, the economy and environment. Allowing water-compatible and essential infrastructure development on undeveloped 3b sites should not increase the risk of flooding elsewhere or result in net loss of floodplain storage. Using the sequential test for other sites (also in line with NPPF guidance) would ensure that development is directed towards land in flood zone 1 where possible. It would also enable development to come forward on flood zone 3a sites where the sequential test has been passed because of the huge need for development in Oxford and the lack of availability of sites in other locations.
B) Preferred option (Combination of A + B)**:** Allow some development on brownfield, previously developed land in flood zone 3b, either small-scale household extensions or redevelopment of sites that does not increase the footprint of built development. Very high standards of flood mitigation measures and reduced run-off will be required to ensure it will not reduce flood storage or lead to increased risk of flooding elsewhere and to ensure its occupants are not put at risk.	This option would allow development on brownfield sites in floodplains where evidence shows this development would have a neutral or positive effect on water retention and storage. Existing developments e.g. buildings may contribute to surface-level run-off. Some brownfield sites, particularly areas of hardstanding, can have a function in flood storage and decreasing flood flow to other areas. Therefore, in most cases the overall footprint of development should not be substantially increased. It will be vital that it is clearly demonstrated that new development would not impede the flow of water, reduce the capacity of the floodplain to store water, create or increase any risk for occupants, or increase the risk of flooding elsewhere. This option encourages efficient use of land and may also allow development close to where people live, helping to sustain vibrant communities. It could enable the delivery of more housing, education or health facilities on sites that are already well served by essential services and facilities. Greater use of brownfield sites for new development is likely to reduce the need to use greenfield sites and this should help to maintain and where possible improve water quality.
C) Alternative Option: Prevent development on greenfield sites in flood zone 3a (with a 1/100 risk of flooding or greater) with specified exceptions, e.g. car parks, or exceptions for allocated sites.	This option would have some additional positive effects on minimising risk of flooding as it would be expected that greenfield sites in flood zone 3a act as flood storage areas. Preventing development in these areas will help to ensure they maintain their full function as flood storage areas, which will ensure no increase in flood risk elsewhere. The option adds to protection of greenfield sites and there may be an additional benefit in terms of water quality. However, it could also prevent some sites coming forward that might be used for housing, education or health facilities, in situations which would be fully compliant with the NPPF. In a city such as Oxford, where all development is well located for accessing facilities and sustainable travel modes, and where there is such demand for scarce land, opportunities to find suitable development sites should be maximised.
D) Alternative Option: Do not include a policy on flood risk zones but rely on national planning policy.	The guidance in the NPPF steers development to flood zone 1, and then follows the sequential and exception tests. This option aims to reduce the risk of flooding in all flood zones. Without robust policy on mitigation measures and reduced run-off, this could lead to the delivery of development that is not sustainably constructed, and that is not adaptable to the changing climate.

Opt 39: Flood risk assessment

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy setting out when a FRA is required, i.e. for all development in Flood Zone 2 or 3, for all development over 1 ha, for all development, including change of use in to a more vulnerable class where it	This option would ensure a flood risk assessment is carried out for all developments that are likely to have an impact on or be impacted upon by flooding. The assessment would set out how flood risk would be avoided, managed and mitigated. The application of this option could restrict the level of development, if sites are deemed to be at too great a risk from flooding, but it also would ensure that development is designed sustainably, is resilient to the

would be affected by sources of flooding other than rivers, e.g. surface water drains. Set out in the policy that the broad approach of assessing, avoiding, managing and mitigating flood risk should be followed.	changing climate and would not put people at additional risk from flooding.
B) Rejected Option: Do not include a policy on flood risk assessment but rely on national planning policy.	This option is likely to ensure a flood risk assessment is carried out for all developments that are likely to have an impact on or be impacted on by flooding. However it would not make it explicit when FRA is required, and does not factor in flood risk from sources than rivers, including surface water and groundwater.

Table 40: Sustainable drainage

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy to give guidance on the implementation of SuDS and also when SuDS will be required, which would be for all developments unless shown not to be feasible.	This would provide certainty over when SuDS is required, and enable more specific requirements for Oxford in the context of the local flood risk. The policy could include reference to the emerging Design and Evaluation Guide to SuDS being produced by the City and County Council. Reference to the design guide would enable other important SuDS issues to be highlighted, such as biodiversity and the ability to additionally use SuDS as green infrastructure and open space. Well-designed (and not hard engineered) SuDS can offer a wide range of ancillary benefits including improved water quality, increased tolerance of droughts and enhanced amenity and habitat features.
B) Alternative Option: Do not include a policy on sustainable drainage but rely on national planning policy and other regulatory regimes.	Relying on national guidance and non-statutory standards would underplay the significance of flood risk in the city and the important role that SuDS play in the mitigation of that risk. In this context it is important that a locally specific approach to SuDs is brought forward into policy. In addition the national standards so not include consideration of the water quality benefits of SuDS and so this element would be missed.

Opt 41: Surface and groundwater flow and groundwater recharge

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C)**:** Include a policy that only permits development where there is no adverse impact on groundwater flow.	Development involving underground structures may adversely affect groundwater flow to springs, rivers or both, which can adversely impact wildlife habitats and cause local flooding. This policy option will seek to ensure that groundwater flow is not adversely impacted by development proposals. It would help to ensure that effective preventative measures are taken to ensure that groundwater flow is not obstructed through underground structures.
B) Preferred option (Combination of A + B + C)**:** Include a policy that requires SuDS and an assessment to demonstrate there will be no adverse impact upon the surface and groundwater flow to the Lye Valley SSSI.	The Lye Valley SSSI is a rare habitat that is sensitive to both groundwater and surface water flow. The policy could apply to a defined area, but this could be difficult because of a lack of detailed information on the hydrology of the area, or it could be applied to allocated sites within the area that is likely to impact on the hydrology of the SSSI.
C) Preferred option (Combination of A + B + C)**:** Include a policy that requires SuDS and a hydrological survey assessing the impact of development proposals on groundwater flows to the SAC.	The Oxford Meadows Special Area of Conservation (SAC - of European importance) is sensitive to groundwater recharge through the north Oxford gravel terrace. To ensure the quality of the SAC is maintained, it is important that effects of developments in the surrounding area are understood and managed. This policy could apply to all developments on or near to the north Oxford gravel terrace, or to allocated sites in the area
D) Alternative Option: Do not have a policy on groundwater or surface water flow but rely on national planning policy and other regulatory regimes.	This option would not offer any additional protection against the risk of flooding e.g. as a result of basement development.

4.34 Health and Pollution

The environment is a major determinant of the health and wellbeing of the population and therefore the planning system has an important role to play. To achieve the vision of a healthy and sustainable city the Local Plan should include policies to help improve the health of residents and to minimise pollution and its effects.

4.35 National Planning Guidance directs Local Authorities to address health and a range of environmental hazards in Local Plans including air quality, land contamination, light pollution and noise. Noise can significantly affect the environment, health and quality of life enjoyed by individuals and communities. In some circumstances noise can have an adverse impact on local wildlife.

Opt 42: Health Impact Assessment

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that requires all developments over a certain size (e.g. major developments) to submit a Health Impact Assessment as part of an application	One of the themes of the Local Plan is a healthy city. A development that is good for health will be a better development and will be more attractive and pleasant for people who live, work or visit it. The NPPG notes that a "health impact assessment may be a useful tool to use where there are expected to be significant impacts." HIAs offer a mechanism for to understanding the potential health risks and benefits of any proposed development in a rigorous fashion. They can identify potential impacts and quantify or describe positive and negative health impacts on different groups. As with other assessment tools HIAs can be a short simple exercise for smaller, less complex developments and more extensive and detailed for larger complex developments. A HIA can be a freestanding document or incorporated into an environmental impact assessment or other form of assessment. A policy requirement would need to be clear about the thresholds for requiring HIAs and the level of detail sought.
B) Alternative Option: Do not include a policy on Health Impact Assessment but rely on the use of other planning policies in determining the proposals' impact on health (e.g. open space, sustainable travel, housing standards, air quality etc.)	One of the themes of the Local Plan is to help create a healthy city. As such there are a range of policy approaches included in this document which will collectively ensure that development help address health impacts. Policies on open space and sports provision, sustainable travel and promotion of walking and cycling, housing standards and a range of environmental issues including air quality all seek to ensure that the health impact of development is positive and that negative impacts are mitigated. In this context it may be unnecessary to require an additional, specific assessment when in practice all the measures that would be documented in a HIA would already need to be evidenced for policy compliance.

4.36 Air quality

It is clear from the consultation responses and background data that air pollution is of particular concern in Oxford. The primary source of air pollution is Oxford is from motorised transport. The whole of Oxford is an Air Quality Management Area and while there has been an improvement in air quality in the city in recent years there is still a need for more action as air pollution, monitored at 75 locations across Oxford, is still breaching targets set by the European Union in 32 per cent of the locations. A study that investigates options for introducing a Zero Emission Zone in Oxford from 2020 will be completed shortly.

4.37 Options can consider various ways to ensure that the air quality does not worsen because of the introduction of a development, and also to manage the impact of air pollution on new occupants. It is also possible to look at

ways to minimise potential negative impacts of poor air quality. The NPPF (paragraph 120) says: *"To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate to its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account."*

> **It is clear from the consultation responses and background data that air pollution is of particular concern in Oxford.**

Opt 43: Air quality assessments

Policy approach	Consequences of approach/discussion
A) Preferred option: Air Quality Assessment will be required for all major developments, or any other development considered to have a potentially significant impact on air quality. Any resultant significant impacts on air quality in an air quality management area must be mitigated. The Air Quality Assessment should consider sources of air pollution including transport generated and from combustion systems.	The Planning Practice Guidance (PPG) sets out the information that may be required in an air quality assessment, making clear that "Assessments should be proportional to the nature and scale of development proposed and the level of concern about air quality". Many Air Quality Assessments currently tend to neglect the contributions of the emissions from energy centres/combustion systems, and focus mainly on emissions resultant from traffic. The introduction of this policy re-enforces the importance of assessing the emissions of this significant source of air pollution. According to the latest figures (Air Quality Action Plan for Oxford – AQAP), commercial, institutional and residential combustion processes are responsible for 17% of the total NOx emissions of the city. If the Air Quality Assessment shows a negative impact on air quality then the appropriate cost and level of mitigation should be calculated. This can be done through an air quality damage cost calculation. Damage costs are a simple way to value changes in air pollution. They estimate the cost to society of a change in emissions of different pollutants. Damage costs are provided by pollutant, source and location. This is appropriate for small air quality impacts (below £50 million) provided the proposal does not affect areas likely to breach legally binding air quality limits. A full list of damage costs is available (www.gov.uk/guidance/air-quality-economic-analysis).

	A mitigation approach implemented in London requires development to be 'air quality neutral', meaning the building and transport emissions must be calculated and compared with a benchmark for development. The calculations cover the emissions of nitrogen oxides and PM10. The guidance also sets emission limits for boilers and centralised energy plant. This approach can be used as an alternative to damage costs and could be clearer and easier to calculate.
B) Rejected Option: Do not include a policy on air quality assessments, but rely on other regulatory regimes.	This option is not considered to be reasonable due to the current position with the city's air quality breaching EU/UK legal targets.

Opt 44: Air Quality Management Area

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + C)**:** Include a policy which ensures that future development does not conflict with the Oxford Air Quality Action Plan, and that development does not have a net adverse impact on the air quality in the Air Quality Management Area, or in other areas where air quality objectives are unlikely to be met.	The entire city of Oxford has been designated an Air Quality Management Area (AQMA) in 2010 due to the constant breach of NO_2 annual mean limit values. As such, an action plan has been put in place by Oxford City Council with measures to tackle this issue. The evaluation of air quality impacts caused by the introduction of any new development, taking into account both construction and operational phases, is therefore essential for the maintenance/reduction of the pollution levels in the city.

This will ensure that measures to improve air quality are not impacted by poorly designed developments. This policy will allow us to ensure that developers are constantly aligned with the plans we have for the reduction of air quality concentrations up to safe levels in the city.

The NPPF (paragraph 124) supports this approach clearly:" (…)Planning decisions should ensure that any new development in AQMA's is consistent with the local air quality action plan." |
B) Rejected Option: Do not include an air quality policy that contributes to the prevention of any potential degradation of air quality inside an AQMA, but rely on other regulatory regimes.	This option is not considered to be viable due to current breaches of air quality EU/UK legal targets. This approach is also not supported by the NPPF.
C) Preferred option (Combination of A + C)**:** Planning Permission will not be granted for any development that introduces new occupants in areas where air quality objectives are not being met, without making provisions to address local problems of air quality [particularly within AQMAs], such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans. Particular attention should be paid to development proposals such as housing, homes for elderly people, schools and nurseries in those locations.	Poor air quality is the largest environmental risk to public health in the UK. It is known to have most severe effects on vulnerable groups, for example the elderly, children and people already suffering from pre-existing health conditions such as respiratory and cardiovascular conditions (WHO, 2013). This approach will make sure that we protect people from breathing very poor air, with all the known health impacts that could have. The impacts of poor air quality on people's health need to be addressed, even if there is no expected increase in emissions.
D) Rejected Option: Do not include an air quality policy that could protect the introduction of new occupants in areas of already existing poor air quality.	The links between poor air pollution and health are clear, and over the last few years have been confirmed by many reports. In 2014 Public Health England estimated the mortality burden attributed to long term fine particulate air pollution exposure in Oxfordshire to be 5.6% of the population, equivalent to 276 deaths (Age 25+) and equivalent to 2944 life years lost. This also presents a huge monetary and social burden for the NHS. This option should therefore be rejected.

Opt 45: Protection of future occupants against nuisances such as noise and light

Policy approach	Consequences of approach/discussion
A) Preferred option: Require adequate protective measures if future occupants of residential development would otherwise suffer from nuisance, e.g. from noise, dust, fumes, odour, vibration, light or proximity to hazardous materials.	This option should provide greater protection to health and wellbeing of the population. In principle, a policy that defines unacceptable levels of environmental impact can only be considered in general terms. It is impossible to define unacceptable levels of impact in all circumstances, given the different types of development, locations, land use and their relative sensitivity. In some cases detailed planning conditions (for example relating to the specific time at which an activity is acceptable) may be required.
B) Alternative Option: Do not include a policy on nuisance but rely on other regulatory regimes.	This option would rely on other regulatory regimes (the Environmental Protection Act 1990) and general development management policies covering design and residential amenity for example.

Opt 46: Lighting and light pollution

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy to ensure that new proposals do not result in unacceptable levels of light pollution and light spillage	This option would address the inappropriate use of lighting (including for example floodlighting) which can cause an unacceptable nuisance and loss of public amenity. The NPPF (para 125) requires planning policies to encourage good design which would limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and ecology. This policy option could consider the impact of lighting in terms of 'light spill', the impact it will have on the night-time sky, the loss of amenity to residential properties and any impact on local wildlife.
B) Alternative Option: Do not include a policy on lighting but rely on national planning policy.	This option would rely on national polices and guidance included in the NPPF and PPG.

Opt 47: Noise and noise pollution

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy which only permits development where it will not cause unacceptable noise, particularly near noise-sensitive uses and amenity spaces.	This option may result in a number of positive effects on human health and quality of life as well as the natural environment. Any policy on noise should be compliant with the NPPF (para 123) that recognises that development will often create some noise and existing businesses wanting to expand should not have unreasonable restrictions put on them.
B) Alternative Option: Do not include a policy on noise pollution but rely on national planning policy and other regulatory regimes.	This option would rely on the NPPF and any other regulatory regimes (the Environmental Protection Act 1990).

Opt 48: Contaminated land

Policy approach	Consequences of approach/discussion
A) Preferred option: Require submission of details of investigation of any site suspected to be contaminated and details of remedial measures, which must then be carried out.	Oxford has a number of closed landfill sites of varying ages, some of which are producing landfill gas. There are previously developed sites that have been contaminated by historic industrial processes. This policy option would ensure there will be no threat to the health of future users or occupiers and no adverse impact on the quality of local groundwater or surface water quality.
B) Alternative Option: Do not include a policy on contaminated land but rely on national planning policy and other regulatory regimes.	This option would rely on policies included in the NPPF (para 120 and 121) and any other regulatory regimes (the Environmental Protection Act 1990)

5. Protecting and enhancing Oxford's green setting, open spaces and waterways

5.1 *Objectives*
- To protect and enhance a network of multi-functional green spaces and ensure easy access to high quality green space
- Enhance green spaces so they deliver multiple benefits to health and wellbeing, are rich in biodiversity, and help the city adapt to climate change

National Planning Policy says:

5.2 The *National Planning Policy Framework* (NPPF) is clear that local authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (Paragraph 114). The *Planning Practice Guidance* (PPG) encourages a broad interpretation of green infrastructure, explaining that 'green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls'. The consideration of the different roles that green spaces and water (or blue infrastructure) can perform (such as drainage, recreation and enhancing sense of place), both individually and as a network, is at the heart of the green infrastructure policy approach.

5.3 The NPPF requires planning policies to be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision (Paragraph 73). The NPPF is clear that existing open space should not be built on unless it has been clearly shown to be surplus to requirements (Paragraph 74). The NPPF also sets out that Local Plans should allocate land with the least environmental or amenity value for development (Paragraph 110) and identify land where development would be inappropriate (Paragraph 157).

5.4 The NPPF requires local authorities to adopt proactive strategies to mitigate and adapt to climate change (Paragraph 94). When new development is brought forward in areas which are vulnerable to climate change, it is suggested that risks should be managed through suitable adaption measures including green infrastructure (Paragraph 99).

5.5 The NPPF is also clear that planning policies should plan for biodiversity at a landscape scale, identifying and mapping components of ecological networks, and promoting the preservation and restoration of priority habitats, ecological networks and priority species populations (Paragraph 117).

An environmentally sustainable city

An enjoyable city to live in and visit

A strong community

A healthy place

The Oxford story – background evidence and the Sustainability Appraisal:

5.6   Oxford benefits from a wide range of green spaces such as parks and gardens, amenity space, natural and semi-natural spaces, historic sites, functional green spaces (such as floodplain) and sites of importance to nature conservation. The Rivers Thames and Cherwell and the Oxford Canal (along with their tributaries) form important elements of blue infrastructure for the city. These green and blue spaces and features perform important functions both individually and as part of a wider network:

- Social Functions – contributing to health and wellbeing, heritage, sense of place and tranquillity
- Environmental Functions – supporting biodiversity, water management and air quality
- Economic Functions – supporting jobs, tourism and an attractive business environment

5.7   The benefits provided by green spaces in Oxford were evident throughout the sustainability appraisal assessments.

5.8   We need to think carefully about the current and future roles of Oxford's green spaces. There is a huge need for more homes, including affordable homes, and a need to support economic growth, but limited land available to deliver this. We therefore need to consider if there are any low value green spaces that may be suitable for development. We also need to make sure that Oxford is a healthy and attractive place to live, work and visit, that biodiversity is protected and enhanced where possible, and that the city is able to deal with the impacts of climate change. Green spaces play a very important role in helping to achieve this.

5.9   To help in thinking about the current and future roles of Oxford's green spaces, the City Council has produced a Green Infrastructure Study. The study identifies Oxford's green spaces and assesses their social, environmental and economic functions. This information is then used to identify a network of multi-functional green spaces that is likely to require protection through the Local Plan. In a compact city where development needs to be accommodated, it is the quality and accessibility of a network of spaces that will be important. The focus of the Local Plan's green infrastructure policies will therefore be on maintaining and enhancing a green infrastructure network rather than on setting (and then seeking to achieve/maintain) any particular quantum of open space across the city or a simple focus on individual sites of import.

5.10   The SA highlighted how a green infrastructure policy would have significant positive impacts across a range of sustainability objectives including flooding, vibrant communities, human health, green spaces, biodiversity, air and water quality and climate change. The SA identified a range of potential positive and negative impacts that could result from policies on specific aspects of green infrastructure (for example on biodiversity sites or playing pitches). It is clear that a careful balance will need to be struck in framing such policies.

Responses to first steps consultation:

5.11   It is clear from the consultation responses received that Oxford's green spaces are highly valued. The majority of respondents (454) agreed that it is important to protect a network of green spaces across the city for different needs such as recreation, biodiversity and flood protection. A large number of people (348 respondents) thought that the City Council should work with private landowners to increase access to existing green

We need to think carefully about the current and future roles of Oxford's green spaces.

spaces, and 195 respondents said that they felt it was important to have public open space in new developments.

5.12   When asked if development on less sensitive green spaces should be allowed if it brings improvements to public open space, views were more mixed although more people agreed (122) with this approach than disagreed (79).

Potential policy responses:

5.13   Green infrastructure protection and provision
        The range of benefits that open spaces and waterways provide, and their particular significance as part of Oxford's setting, and as a green lung in a compact city, means that the Local Plan must protect important spaces and ensure that new development contributes to improving the quality of provision. To maximise the benefits that these assets offer it is important to view them as a network operating collectively to provide wildlife corridors, pedestrian and cycle routes and areas of flood storage amongst other functions.

Opt 49: Managing the overall amount of Public Open Space in Oxford

Policy approach	Consequences of approach/discussion
A) Preferred option: Focus on protecting green spaces that are important Green Infrastructure and improving the quality of green spaces. Do not set an overall target for the total quantity of public open space across the city.	Maintaining a range of high quality, accessible green spaces across the city, which blend with the built environment, is essential to ensuring that Oxford is a healthy and attractive place to live, work and visit. This approach focuses on the protection and improvement of Oxford's green spaces. New public open space would be delivered through new developments. Not having a fixed, quantity based standard (which would be somewhat artificial) allows greater flexibility to focus on providing high quality, accessible green spaces in the right locations where they can provide the most social and environmental benefits.
B) Rejected Option: Aim to maintain the existing ratio of accessible green space per 1,000 population.	The Core Strategy policy is to maintain an overall average of 5.75 hectares of accessible space per 1,000 population. This approach is based on the protection of existing spaces and the requirement for new developments over 20 dwellings to provide 10% of on-site open space. It is increasingly difficult to maintain a fixed ratio of green space to population in Oxford as the majority of developments are on small sites where the policy of on-site open space provision does not apply and would not be appropriate as it would result in very small unusable spaces. It is also difficult to maintain this ratio where the density of development is being increased, sites are being used more intensely, and there is a limited supply of land available. A more flexible approach is needed in the Local Plan to ensure that Oxford has appropriate high quality useable green space provision.
C) Rejected Option: Adopt the standard in the Green Space Strategy of maintaining or increasing the existing amount of accessible green space in Oxford.	The City Council's Green Space Strategy concluded that a ratio linked to population was becoming less helpful over time and instead opted for a target to maintain the total hectares of unrestricted open space at 785 hectares (adjusted slightly since set at Core Strategy) and seek opportunities to increase this. This option would involve embedding the Green Space Strategy target in planning policy. Whilst this approach would seek to maintain and potentially increase the amount of accessible green space in Oxford, the quality of green spaces is not considered. This approach may also be overly restrictive of new development given the limited land available in Oxford. Despite this option being rejected for the Local Plan, retaining an overall target or standard would continue to be an appropriate approach in the different context of the Green Space Strategy.

Opt 50: Creating a green infrastructure policy designation

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Use the Green Infrastructure Study to identify the green spaces that are worthy of protection for their social, environmental and economic functions and create a new 'Green Infrastructure Network' designation. Include a policy which protects these spaces.	This would be a new approach to providing protection for green spaces in Oxford. Having a specific 'Green Infrastructure Network' designation and protection policy recognises the many benefits provided by Oxford's green spaces and their value as a network for biodiversity and recreation. A strength of this approach is that it prioritises the protection of Oxford's green spaces collectively on a multi-functional basis. Another benefit is that it would develop a network of linked spaces, providing a policy basis for not just the most important or significant sites but also those that link them.
B) Preferred option (Combination of A + B): Continue to have separate policies and protections for some specific types of green infrastructure, for example playing pitches, biodiversity sites, allotments.	Separate policies and protections, instead of an overarching green infrastructure policy, would be unlikely to take into account the multi-functional nature of green infrastructure or its value as a network of green spaces. However, if separate topic based polices and protections were used in addition to an overarching green infrastructure policy, they could provide more detailed criteria and guidance where needed to take into account the specific issues relating to different types of green infrastructure.
C) Rejected Option: Include a policy to only afford protection to the larger or more strategic of the green spaces identified in the Green Infrastructure Study as having important green infrastructure functions.	By focusing on protecting only larger strategically important green spaces, this approach would provide little protection for smaller green spaces that may have important (or even more important) local social and environmental functions. Smaller green spaces can also have an important function in terms of providing connections between larger green spaces, particularly in terms of biodiversity and wildlife corridors but in other respects too. Taking this approach would miss the opportunity to build a network of spaces; it would mean that the focus is solely on the benefits of individual spaces, and would neglect the important additional functions that they provide collectively as part of a wider network.

Opt 51: Securing net gain in Green Infrastructure provision, particularly public access to open spaces

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Require larger developments (likely to be sites of 1ha or more) to provide public green space on-site that is at least of a size suitable to be a 'Small Park'. Require financial contributions from smaller developments towards the improvement of existing green spaces or the creation of new parks in identified locations.	This approach aims to deliver new public open spaces that are of a size that will provide real social and environmental benefits, particularly in terms of providing adequate space for play and recreation.
B) Preferred option (Combination of A + B): Create new public open space by allowing development on parts of some private green spaces (those which have been assessed to have a minimal contribution to the green infrastructure network) to facilitate public access and improve the quality of the remaining open space.	There are many areas of private open space in Oxford which currently have no or only informal public access. Increasing public access to such private green spaces will be an important way to increase the amount of public open space available. This will be particularly important given the limited availability of land and the needs of a growing population. It will be essential that any permission which results in the loss of part of a private green space secures formalised and effective public access to those areas that remain undeveloped. Careful consideration would be needed in deciding the parts of private green spaces to be developed in order to avoid any potential negative impacts, for example on flood risk and character of an area.
C) Alternative Option: Continue to require on-site green space for residential development of 20 dwellings or more.	Where developments cannot provide public green space of at least a size suitable to be a 'Small Park', the green spaces can be difficult to manage and often provide few social and environmental benefits. A more efficient use of land would be to focus on delivering larger green spaces that can provide real benefits for local communities (as set out in option a).

Opt 52: Ensuring that new developments improve the quality of Green Infrastructure

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Require developers to demonstrate (for example in the Design and Access Statement) how new or improved green infrastructure features will contribute to (for example): • Public access • Biodiversity • Soil protection • Climate change (including flood risk) • Sustainable drainage • Health and wellbeing • Recreation and play • Character/sense of place • Connectivity of walking and cycling routes • Creating linkages with the wider green infrastructure network (and the countryside) • Food growing	It is important that opportunities to maximise the benefits provided by new or improved green infrastructure are realised. New green infrastructure should be functional, well designed and contribute to wider aims such as enhancing biodiversity, managing flood risk and enhancing the character of an area. The Design and Access Statement may provide the best mechanism for requiring such information. These statements are required to be submitted as part of any major application (10 homes or 1,000m^2), listed building consents and most development in a conservation area.
B) Preferred option (Combination of A + B): Require developers to demonstrate how existing green infrastructure features not formally protected as green infrastructure through the Local Plan have been incorporated within the design of new development.	There will be natural features across Oxford that may not be formally protected through the Local Plan due to their size (for example hedgerows, small clusters of trees and very small public green spaces). Where appropriate these features should be retained and incorporated in the design of new developments. It would be important to be clear when drafting this approach that garden land developments will continue to be an important source of housing sites in Oxford. It may be beneficial to require such information for garden land developments in order to understand how the existing features have been considered in developing the design.
C) Rejected Option: Do not include a policy requiring developers to demonstrate how green infrastructure has been taken into consideration in the design of development.	There is a risk that natural features may be poorly incorporated or that new features will be poorly designed so that opportunities to contribute to wider aims such as enhancing biodiversity, managing flood risk and enhancing the character of an area may not be fully realised.

5.14 Policy options for specific types of green spaces
These options would be applied in addition to the overarching policies on green infrastructure protection and provision outlined above. These policy options provide more detailed policy guidance for specific types of green infrastructure where needed (for example playing pitches, allotments and trees).

Opt 53: Biodiversity sites, wildlife corridors. Species protection independent ecological assessment (accounting)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B): Protect a hierarchy of international, national and locally designated sites of importance for biodiversity, including connecting wildlife corridors.	Sites with international importance (such as the Port Meadow SAC) and national importance (such as SSSIs) must be protected. However there are also local sites with biodiversity interest (such as Local Wildlife Sites and other sites designated for their local biodiversity interest) that can provide important social and environmental benefits. These sites can also have important network functions in terms of providing connections between larger areas of habitat, supporting biodiversity across the city and should be protected.
B) Preferred option (Combination of A + B): Protect other sites with	There are sites in Oxford that do not have specific designations but that are of biodiversity interest, for example sites where there are records of protected

biodiversity interest. The use of a biodiversity calculator will be required to demonstrate net gain for biodiversity. The principle of the 'avoid, mitigate, compensate' hierarchy will be expected, and where damage is unavoidable, offsetting may be considered as long as overall net gain is demonstrated.	species. It is important that this biodiversity interest is protected. Following the hierarchy of 'avoid, mitigate, compensate' is the best practice approach to take; it is likely that in the vast majority of cases it will not be necessary to work right through the hierarchy, and that off-setting will only be appropriate in those cases where the City Council agrees that damage is unavoidable.
C) Rejected Option: Protect biodiversity sites of national and regional importance only.	This approach offers no protection for sites of local biodiversity interest. There is a risk that these sites could be lost which would have a negative impact on Oxford's biodiversity.

Opt 54: Playing pitches

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a criteria based policy to protect playing pitches, allowing loss under certain limited circumstances which are clearly set out in the policy. These might include replacement nearby or improvement to nearby facilities, or demonstration they are surplus to requirements.	It is important that playing pitches are protected as they support health and wellbeing by providing opportunities for organised sport and other recreational activities. Playing pitches may also provide a range of other green infrastructure benefits. This approach provides strong protection for playing pitches whilst also providing flexibility to respond to changes in playing pitch supply and demand over time where specific criteria are met in line with national policy requirements.

Where playing pitches are no longer required and assessments show that they are unlikely to be required during the plan period, identifying them as having development potential through the Local Plan will help to encourage a more efficient use of land. |
| **B) Alternative Option:** Protect playing pitches as part of the Green Infrastructure protection, rather than as a separate policy and protection. | In some cases playing pitches may be identified as forming part of Oxford's green infrastructure network. However, this may not apply to all playing pitches. Therefore an overarching Green Infrastructure policy may not provide sufficient protection for all of Oxford's playing pitches. In addition, an overarching policy may lack specific detail relating to playing pitch provision. A specific playing pitch policy will likely be required in addition to an overarching policy to deal with topic specific issues. |
| **C) Rejected Option:** Have a policy of blanket protection of all playing pitches. | Whilst this approach provides strong protection for Oxford's playing pitches, it provides no flexibility to respond to changes in playing pitch supply and demand over time. It would prevent development on playing pitches even where it can be demonstrated that playing pitches are surplus to requirements and therefore may result in an inefficient use of land and loss of opportunities that may arise. |

Opt 55: Allotments

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a criteria based policy to protect allotments, considering the loss of allotments or parts of allotments only under certain very exceptional circumstances such as them being disused or having substantial areas unused for a long time suggesting they are too large for demand in the area, replacement nearby and improvement to nearby facilities.	Allotments provide a range of social and environmental benefits such as encouraging physical activity, supporting biodiversity, and reducing food miles. This approach provides strong protection for allotments whilst also providing flexibility to respond to changes in allotment supply and demand over time where specific criteria are met in line with national requirements. Where allotments or parts of allotments are underutilised or surplus to requirements, identifying them as having development potential through the Local Plan may help to encourage a more efficient use of land.
B) Alternative Option: Have a policy of blanket protection of all allotments, except any sites that area specifically identified as surplus and allocated.	This approach provides no flexibility to respond to changes in allotment supply and demand over time. It would prevent any development on allotments, even where it can be demonstrated that all or part of the allotments are surplus to requirements. Therefore this approach may result in an inefficient use of land.

Policy approach	Consequences of approach/discussion
C) Rejected Option: Do not include a policy to protect allotments (other than any that are identified as part of a green infrastructure network) but rely on national protection.	Allotments already benefit from strong protection in law and the Secretary of State's consent is required where the loss of allotments is proposed. Where the loss of an allotment is proposed it must be shown that alternative allotment provision will be provided, the allotments are no longer needed, or it is no longer feasible to use the land for allotments. To not include a Local Plan policies would mean that these sites were not then identified on the proposals map. It would also miss the opportunity to provide criteria for assessing the importance of allotments and whether they might be suitable for moving or replacement.

Opt 56 Protecting and promoting watercourses – Making more of blue infrastructure

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Where development is proposed adjacent to watercourses, require developers to demonstrate (for example in the Design and Access Statement) how they will protect and positively promote the watercourse.	The Rivers Thames and Cherwell and the Oxford Canal run through the city and are an important part of Oxford's character, as well as providing a range of other social and environmental benefits. The rivers connect with a network of smaller watercourses. It is important that we make best use of these resources, taking opportunities to improve and enhance watercourses whenever possible. A watercourse policy could include: • A presumption against culverting • A design requirement that development should face watercourses and make them a feature, rather than turning their back on them • The potential for re-profiling and re-naturalising of watercourses.
B) Preferred option (Combination of A + B)**:** Identify potential improvements in access to blue infrastructure such as towpath links or increased accessibility through policy.	Opportunities to improve and enhance access to and along Oxford's watercourses should be identified and promoted where possible and appropriate. For example towpaths and other paths along watercourses can provide valuable walking (and in some cases) cycle routes; identifying any gaps in the network or additional connections onto such routes would be beneficial and help make the most of these sometimes hidden assets. The benefits of access to watercourses are not limited simply to linear journeys; providing access to areas of green space alongside waterways can be very valuable for people seeking a quiet space or a pocket of natural landscape in an urban setting.
C) Alternative Option: Incorporate watercourses as part of green infrastructure network protection, and do not have any specific policy details relating to watercourses.	Watercourses can be important assets in this context and where appropriate, they will likely be protected by an overarching Green Infrastructure Network policy or other policies protecting specific natural features such as biodiversity. However, these policies may not provide sufficient detail on watercourse related issues. A policy focused specifically on watercourses is likely to be required in addition to an overarching green infrastructure network policy and other protections of natural features.

5.15   Policy options that help to support green infrastructure objectives

As well as identifying and protecting valuable green open spaces and biodiversity, it is important that opportunities are taken to ensure that new development implements green infrastructure features in the most beneficial way. This is particularly important in Oxford where land is scarce and all opportunities should be taken to support green infrastructure objectives.

Opt 57: Species enhancement in new developments

Policy approach	Consequences of approach/discussion
A) Preferred option: Integrated ecological enhancements such as bird, bat and invertebrate boxes and planting of native species (particularly those which provide rich sources of nectar for pollinators) will be required in all developments.	This approach supports and provides for species enhancement within the built development. New buildings and their associated landscaping offer opportunities for habitat creation, to provide for native planting, and to support birds, bats and pollinators. It will be important that any requirements for species enhancement are appropriate to the scale and location of development.

| B) **Rejected Option:** Do not include a policy requiring habitat creation in new development. | Opportunities for increasing species provision may be missed. This could result in gaps in ecological networks and could have a negative impact on overall levels of biodiversity. |

Opt 58: Trees affected by new development

Policy approach	Consequences of approach/discussion
A) **Preferred option** (Combination of A + B)**:** Only allow the loss of trees where it is clearly justified and where possible mitigated. Require developers to demonstrate how the retention of existing trees and the planting of new trees has been considered in the design and layout of new development and outside spaces. This should include consideration of how tree canopy cover can be protected or enhanced.	Trees can perform a number of important functions such as helping to improve air quality, supporting biodiversity and contributing to the character of an area. It is important that, where possible, developments are designed to enable the retention of established trees and to incorporate the planting of new trees. Where the loss of trees is proposed this should be clearly justified and, where possible, mitigated by the planting of new trees. Consideration should be given to connection with the wider green infrastructure network. Rather than the number of trees, it is tree canopy cover that often has the biggest impact on setting and that correlates to the benefits that trees can bring. Therefore, developers should measure existing tree canopy cover and predict what future tree canopy cover on the site will be after development.
B) **Preferred option** (Combination of A + B)**:** Expect developers to have considered options for mitigating against any tree loss, for example: • Replacement of tree removed • Additional tree planting • Protection of tree canopy cover • Where trees cannot be replaced, instead provide green roofs or walls	These requirements would ensure that developers consider other options if tree retention is not feasible. The listing of a variety of potential mitigations would help consideration of feasible measures even on small sites and infill developments. It may not always be possible to replace trees, protect all tree canopy cover or to provide additional trees on sites and therefore these mitigations will ensure policies are not overly restrictive of new development.
C) **Rejected Option:** Do not include a policy on trees.	Tree Preservation Orders (TPOs) are used to protect highly valued trees. TPOs provide strong protection and prevent works to trees without the written consent of the City Council. However, not all trees are protected by TPOs. Not having a specific policy means that the benefits provided by trees may not be fully considered by developers and that opportunities to retain existing trees or to plant new trees may be lost.

Opt 59: Green/brown roofs and walls

Policy approach	Consequences of approach/discussion
A) **Preferred option** (Combination of A + B)**:** Introduce a policy in support of green/brown roofs and green walls.	Green roofs and walls which incorporate planting, can provide a range of environmental benefits such as improving a building's energy efficiency, supporting biodiversity and reducing the impacts of noise, as well as the possibility of additional amenity space on roofs. Brown roofs are a variation which specifically aims at reinstating the ecology that was present prior to development using some of the materials removed through the building process. This policy approach would encourage developers to consider incorporating green/brown walls into new developments.
B) **Preferred option** (Combination of A + B)**:** Introduce a policy requiring green/brown roofs for all developments with a flat roof over a certain size.	Requiring the provision of green/brown roofs on developments with large flat roofs will make a positive contribution to Oxford's green infrastructure network. Having a specific policy requirement will help to ensure that green/brown walls are delivered where the need for planning permission can encourage this. It will be important to make it clear that encouraging incorporation of green/brown roofs where flat roofs are proposed, does not infer that flat roofs are typically the best design solution in Oxford (particularly on large schemes) due to wider skyline considerations.
C) **Alternative Option:** Do not include a policy on green/brown roofs or green walls.	Opportunities to encourage or require green/brown walls or roofs would be missed.

Opt 60: Enhanced walking and cycling connections

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C)**:** Identify potential new routes for cycle and footpaths across open spaces such as public parks, particularly where links would be created to other parts of the network, or major destinations would be joined.	This approach would help to increase opportunities for journeys by walking and cycling. It would help to provide attractive walking and cycling routes in a green setting, separate to cars and buses. It would also help to increase levels of activity and natural surveillance in public open spaces, increasing perceptions of safety. It will be important to ensure that increased access does not conflict with the management of open spaces.
B) Preferred option (Combination of A + B + C)**:** Identify new routes for cycle and footpaths across private open spaces and deliver by negotiating landowner interest or enabling development	This approach would help to increase opportunities for journeys by walking and cycling. It would help to provide attractive walking and cycling routes in a green setting, separate to cars and buses.
C) Preferred option (Combination of A + B + C)**:** Ensure new development does not bisect cycle ways/public rights of way/bridleways/ecological corridors	It is important that new development does not harm existing cycle ways/public rights of way/bridleways/ecological corridors. Maintaining these connections (even if this involves some adaptations to the route) must be prioritised when planning the layout and design of new development.

6. Enhancing Oxford's unique heritage and creating quality new development

6.1   *Objectives*
   • To preserve and enhance Oxford's exceptional built form with its legacy of archaeology and monuments, historic buildings, modern architecture, important views and distinctive townscape characteristics
   • To ensure that all new development delivers a high quality of urban design, place making, architecture and public realm, integrating the historic environment with modern needs

Creating quality new development

National Planning Policy says:

6.2   The *National Planning Policy Framework* (NPPF) says that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people (paragraph 56). Local planning authorities should develop robust and comprehensive policies that set out the quality of development that will be expected for the area, and that are based on stated objectives for the future of the area and on understanding and evaluation of its defining characteristics. Policies should ensure that developments function well over the lifetime of the development and establish a strong sense of place through streetscapes and buildings that create attractive and comfortable places to live, work and visit. Policies should ensure that developments optimise the potential of sites and respond to local character and history, whilst not preventing appropriate innovation; create safe and accessible environments and are visually attractive as a result of good architecture and landscaping (paragraph 58).

6.3   The NPPF also suggests that local planning authorities should consider using design codes where they could help deliver high quality outcomes. Design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development (paragraph 59). The PPG sets out more detailed guidance on the form and nature of design policies.

The Oxford story – background evidence and the Sustainability Appraisal:

6.4   Oxford is a unique city in terms of its built heritage and form and its relationship to the landscape in which it sits. It has a distinct physical form, of a floodplain overlooked by ridges, and much of its character is derived from its landscape setting and the presence of two rivers, and many river tributaries, creating a network of water throughout the city. It is highly recognisable by its iconic skyline and its architecture: Oxford

An environmentally sustainable city

An enjoyable city to live in and visit

A strong community

A healthy place

A prosperous city with opportunities for all

contains buildings from every period of architectural history from the 11th century. Delivering successful, high quality design in new development requires a full understanding of the existing character and heritage of the area. The second part of this section contains policies relating to heritage and conservation, but knowledge of the existing character should always underpin any policy approach to design.

6.5   Robust design policies can ensure that the pressures from both development and the tourism industry do not have a negative impact on Oxford's built environment. Design policies will ensure that new development enhances the city, through delivering high quality architecture and public realms, enhancing active travel modes, producing a safe and clean environment, and making efficient use of limited resources.

6.6   The SA highlighted how including a suite of strong design policies in the Local Plan would have significant positive impacts against the whole range of sustainability objectives from human health to transport and green spaces to economy. However it was clear that the level of the impact would be dependent on how any such policies would be worded. Detailed design criteria could help to ensure that new development maintains/enhances sense of place and local distinctiveness. However, there is a risk that overly prescriptive policies could stifle design innovation. The SA also identified a risk that if the same detailed design criteria were applied across the city it may result in repetitive or monotonous design and may not take into account differences in character in different parts of Oxford.

Responses to first steps consultation:

6.7   It is clear from the consultation responses that people have strong, and varied, feelings about the design of Oxford's built environment. Respondents specifically stated that design quality is important, and that a strong design steer is needed.

6.8   The character of Oxford, and in particular its historic centre, was clearly a prominent feature of opinions about design. A large number of people (198) agreed with the statement that views of Oxford's dreaming spires should continue to be protected by restricting tall buildings, and a similar number (182) agreed with the statement that new development should be planned to protect local character.

6.9   There was considerable negative feedback on the quality of the public realm, particularly in the city centre. Responses commented on unsightly central areas; poorly maintained public spaces and a poor street environment.

6.10   A large number of people agreed that policies should encourage new, modern architecture where appropriate and noting that modern architecture would be acceptable if it responds to Oxford's character and heritage.

6.11   Other issues connected to design included density and height (both of which are addressed in detail in other policy options); the configuration of buildings, focussing on encouraging interaction; and infill development on garden land. Some felt that there was already too much infill development and that it increases congestion, while others commented that infill development needs to be carefully managed. There were some residents in favour of building on garden land.

Robust design policies can ensure that the pressures from both development and the tourism industry do not have a negative impact on Oxford's built environment.

Potential policy responses:

6.12   High quality design

Growth is anticipated in the city, which will need to be planned and designed sensitively and carefully to ensure the existing built environment is not harmed. New development, if it is well designed, has the potential to enhance the City, and to create places which improve the wellbeing and quality of life of their residents, through pleasant, clean and safe environments. Design, particularly of new residential development, also has a significant influence on the transport choices of residents (bike storage, car parking), so it is important that this is taken in to account in order to help address the congestion and poor air quality in Oxford. Oxford will therefore need a robust set of policies to ensure that new development delivers these benefits and does not harm the existing built environment. Further more detailed guidance could also be provided in Technical Advice Notes. This could be particularly helpful in setting out guidance for explaining how a development proposal meets criteria in a Design and Access Statement, for applications where one is required.

6.13   N.B: These design options relate closely to the density and efficient use of land options considered in the "Making wise use of our resources and securing a good quality local environment" chapter.

Opt 61: Creating successful places

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that sets out the best practice requirements and principles for successful place-making in all new development, including legibility, connectivity and integration in the context of Oxford.	This would ensure that new developments contribute to and enhance the built environment, create new communities that are integrated with and enhance existing communities. This will also ensure that new development responds to and respects the unique context of Oxford. It will also have the potential to encourage active travel and reduce car use and this, combined with a pleasant and well-designed living environment will have a positive impact on wellbeing. It will ensure that new affordable housing is well integrated into new developments and is of tenure blind design.
B) Alternative Option: Do not include a policy on place making but rely on national planning policy.	This option could result in mediocre development that fails to respond to Oxford's context.

Opt 62: Responding to Oxford's character and site context

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Include a policy that requires new developments to respond to the unique characteristics of Oxford, and the immediate context of the site, identified by use of Oxford Character Assessment Toolkit, in terms of natural and built environment; historic features including grain of the historic core; scale; massing; rhythm and articulation.	The Oxford Character Appraisal Toolkit helps to assess key positive and negative characteristics of an area. The toolkit does not guide design to copy existing features of the surroundings, but it does ensure that new development is undertaken in the context of understanding the existing characteristics of an area. This policy approach would ensure that new development responds to and enhances the distinctive character of Oxford and its immediate surroundings, and is of high quality. This would add to and enhance the NPPF guidance by referring specifically to Oxford. This will ensure the quality of public realm, in the city centre and in the rest of Oxford, is maintained or enhanced through new development. In residential developments, this would help to balance the demand for housing quantity with housing quality, and by ensuring good design this would have a positive impact on wellbeing.
B) Preferred option (Combination of A + B)**:** Include a policy that sets out design criteria for development of residential gardens.	Areas of private residential gardens are fairly often proposed for new homes in Oxford. These developments are not necessarily 'backland' development, but frequently on the street frontage or adjacent to existing building plots. Design of development on gardens does not count as 'greenfield' development. Design of development of garden land will need to pay particular attention to issues such as the impact on local character, biodiversity and the living environment of new and existing dwellings.

Policy approach	Consequences of approach/discussion
C) Alternative Option: Do not include a policy on design character and responding to site context but rely on national planning policy.	This could lead to new developments which do not adequately consider the character of Oxford in the design. This could lead to new developments which do not adequately consider the immediate site context.

Opt 63: Creating an integrated high quality public realm and setting of buildings

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C)**:** Include a policy setting out requirements for the design of streets, including hierarchies, proportion, wayfinding, relationship of buildings to the street, opportunities for play, car parking design, and cycle parking and storage design.	This will ensure that new development enhances the existing character and amenity of Oxford as part of high quality placemaking. This will help to improve the quality and accessibility of the public realm, and will help to create environments that are more accessible and legible to a range of users, and environments that are conducive to cycling and walking because they are pleasant, feel safe, and wayfinding is easy. This would have a positive impact on wellbeing and air quality. It could also ensure parking in new developments is incorporated in a way that maintains active frontages and overlooking from homes onto the street. It would ensure that consideration of provision and design of cycle parking was integral to the design process and not an afterthought.
B) Preferred option (Combination of A + B + C)**:** Include a policy on landscape design, including requirements for quality, amenity, sustainability and enhancing biodiversity.	This will help to ensure that open spaces delivered as part of new developments are useful, pleasant and provide good amenity. This will improve the quality of the public realm, and also has the potential to enhance biodiversity, and improve resilience to climate change through the requirement of SUDs, or the planting of particular species etc. In residential development, this will contribute positively to the happiness, wellbeing and quality of life of residents.
C) Preferred option (Combination of A + B + C)**:** Include a policy requesting incorporation of a Public Art in certain new developments, supported by a Technical Advice Note.	Public art can help to contribute to the good design and distinctiveness of a development. National policy recognises the importance of good design, but does not refer specifically to public art, so if there is a desire for more developments to provide public art, incorporating this policy would help to ensure its delivery. More detailed requirements in a technical advice note could guide the design and quality of public art to maximise public benefit, and incorporate opportunities for play and engagement. Public art in new commercial/retail developments could also significantly improve the quality of the public realm.
D) Alternative Option: Do not include a policy on creating and integrated public realm and setting of buildings, but rely on national planning policy.	This could result in a poor quality public realm which may deter walking and cycling and lead to increased car use. A poor quality environment can impact negatively on the well-being and quality of life of our communities.

Opt 64: Secure by design

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue to require proposals to demonstrate compliance with the Secure by Design scheme	Creating safe developments and streets is an integral part to ensuring wellbeing, and to increasing walking and cycling mode shares. Secure by Design provides well-established guidance on designing developments to minimise opportunities for criminal and anti-social behaviour, and to create spaces that reduce the fear of crime. Developers will be familiar with this guidance, and therefore will have experience of following it. Whilst Building Regulation Approved Document Q – Security – Dwellings sets out some requirements for security, these relate more to the design of individual buildings, and the security of windows and doors etc. It does not address the broader safety and design considerations covered in Secure by Design. Secure by Design also goes into greater detail than guidance in the NPPF, and so will form stronger policy in the local plan.
B) Alternative Option: Do not include a policy requiring compliance with the Secure by Design scheme.	The NPPF refers broadly to creating safe environments where crime, and the fear of crime, do not undermine community cohesion, but there are not specific standards set out that ensure these aims are met. If compliance with Secure by Design was not required, it would be harder to ensure new developments helped achieve these objectives.

Opt 65: High quality design of new buildings

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy on the design of new buildings requiring that they are of high quality design.	This will ensure that new dwellings are built to the highest standard of design to maintain and enhance Oxford's reputation as a world class city. Well-designed, distinctive buildings are also more sustainable, as they will remain useful for longer, and are therefore an efficient use of resources. Poor or 'standard' design can have a negative effect on an environment, the well-being of communities and would lower standards. The policy could include information on aspects of design such as roofscape (including amenity, adaptability, biodiversity and treatment of services). This will ensure that new development does not have a negative impact on the visual amenity of the existing roofscape. They could also encourage developers to consider the integration of services and utilities infrastructure from an early stage in the design.
B) Rejected Option: Do not include a policy on the design of new buildings, but rely on national planning policy.	This could result in poor or 'standard' quality design of new buildings which add nothing to the streetscape or local environments and would lower standards. Poorly designed buildings have a shorter lifespan and a negative impact on the wellbeing of residents.

Opt 66: Building heights

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy setting out requirements for taller buildings, including appropriate location/height; expectations for intensification of sites in district centres and on arterial roads; massing; orientation; the relation of the building to the street; the potential impact of taller buildings on important views including both in to the historic skyline and out towards Oxford's green setting; and exceptional design, supported by a Technical Advice Note. (Options below relating to 'High buildings, view cones and high building area' are linked to this option.)	In a city like Oxford where land is scarce and there is an imperative to use land efficiently, taller buildings can positively contribute to increasing density, enabling a more efficient use of land, and may also be an appropriate built response to the existing context in certain areas of Oxford, for example in district centres and similar highly accessible locations. This will ensure that, in locations where this will be appropriate, taller buildings can be permitted, but will ensure they contribute to the existing character, and do not detract from the amenity of their surroundings. The aim will be to ensure that variability and interest in the skyline is maintained. Importantly, tall tower blocks often do not make efficient use of land, as large areas of land are needed around them to ensure overshadowing is avoided and to ensure sufficient natural light. It is often mansion block and courtyard style developments of moderate height that make the most efficient use of scarce land. Oxford's iconic historic skyline means that particular care needs to be taken over the design and placement of taller buildings. Taller buildings should not negatively impact on views of the iconic skyline. The impact on views from the historic core to the green hills surrounding Oxford are also important to consider. The section below: 'Enhancing Oxford's Unique Built Environment and Heritage' contains a set of options on how to consider this historic skyline.
B) Rejected Option: Do not include a policy on tall buildings, but rely on national planning policy.	Due to the high demand for housing, and the potential pressure to densify around transport hubs, it is inevitable that there will be increased pressure to build taller buildings. Without a policy, this could result in taller buildings in inappropriate locations, and that detract from the amenity of the street.

Opt 67: Altering existing buildings

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy on the extension of existing buildings to ensure they respond appropriately to the existing form, materials and architectural detailing; retain the legibility and	This should ensure that extensions to existing buildings enhance the existing character of Oxford. This will enable land to be used efficiently, and has the potential to extend the life of existing buildings, which is an efficient use of resources.

	hierarchy of the built environment and do not have an adverse impact on the existing building or on neighbouring buildings.	
B) Alternative Option: Do not include a policy on extending existing buildings, but rely on national planning policy.	This could result in poor quality extensions to existing buildings, which have a negative impact on the existing buildings and the surrounding area.

Opt 68: Shopfronts and signage

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that sets out criteria for determining applications regarding detailed matters of design, for shop fronts, advertisements, shutters and canopies etc.	This would ensure that shops contribute to the design and character of existing buildings and their surroundings, and enhance the quality of the built environment and the public realm. It is likely to aid attempts to avoid visual pollution and clutter and thus would be a positive policy approach. It could also help to maintain Oxford's historic shopfronts.
B) Alternative Option: Do not include policy on detailed design matters of shop fronts and signage but rely on national planning policy.	The NPPF does not address detailed design matters, so relying on the NPPF would equate to having no policy on these issues.

Opt 69: Stores for bikes, waste and recycling

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy setting out requirements for bike storage and bin storage inside and outside dwellings, including space requirements, location, access and design. Require details to be submitted with applications.	Bike storage is essential in Oxford, where travel by bike is already an important mode share, and where an increase is being encouraged. Retro-fitting of bike stores can lead to poor facilities, which detract from the overall design of the development. For flats particularly, convenient, secure cycle parking needs careful thought, early in the design process.
	Given that the total amount of waste generated in Oxford is expected to rise (due to the rise in the number of households) maximising the potential for residents recycle as much waste as possible will be very important. Ensuring that there is adequate space for the range of bins required will enable this, and also ensure that these bins do not detract from the appearance or amenity of the street. It can also ensure that bins are located and stored in such a way that they can be collected efficiently. Bin storage should be integral to the design of new development, and this should be considered from an early stage in the design process, to ensure that it is designed in the best way.
B) Alternative Option: Do not include a policy on bike storage or bin storage, but rely on national planning policy.	This could lead to inadequate bike storage facilities, residents being unable to recycle their waste, and to storage of bikes and bins that detracts from the appearance and amenity of the development and the street.

Enhancing Oxford's unique built environment and heritage

National Planning Policy says:

6.14   The NPPF says pursuing sustainable development involves seeking positive improvements in the quality of the historic environment (paragraph 9). Paragraphs 126 to 141 of the NPPF set out a series of requirements for heritage specific policies and decision making. The objective of the policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance. Heritage significance is the value of a heritage asset to this and future generations because of

its heritage interest, which may be archaeological, architectural, artistic or historic. All grades of harm, including total destruction, minor physical harm and harm through change to the setting, can be justified on the grounds of public benefits that outweigh that harm taking account of the 'great weight' to be given to conservation and provided the justification is clear and convincing (paragraphs 133 and 134). Public benefits will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations.

The Oxford story – background evidence and the Sustainability Appraisal:

6.15   A robust understanding of heritage value is required in order to ensure continued development pressure does not adversely affect assets. As part of its Heritage Plan, the City Council has produced a number of studies and toolkits to help strengthen understanding of heritage and its significance, including the Assessment of the Oxford View Cones, the Oxford Character Assessment Toolkit and A Character Assessment of Oxford in its Landscape Setting.

6.16   A good understanding of heritage value will be required to ensure continued development pressure does not adversely affect heritage assets. A policy setting out how the impact of development on heritage will be assessed could have a positive impact on a number of SA objectives including vibrant communities, because it would ensure that local significance of assets and their contributions to local distinctiveness is taken into account.

6.17   The SA recognised the very special character and quality of the city in terms of its heritage assets; it therefore identified the risk of harm that would likely result from a loosening of policy requirements or reliance on national policy in this area. A strong policy framework was shown to have positive impacts on the sustainability objectives of urban design and heritage and sustainable tourism, but also vibrant communities. Conversely it found that there was a potential risk with taking a very protectionist or restrictive policy approach in terms of missing out on opportunities to provide increased numbers of homes or jobs.

Responses to first steps consultation:

6.18   Historic England emphasised the importance of the city's heritage assets and said their protection should not be subject to meeting its development needs. A few people commented that the protection of the historic environment in general should be prioritised, one person said there should be more conservation areas and another said heritage should not make the city unaffordable. One respondent (a college) was concerned that stringent policies in areas including archaeology, heritage and conservation could add unnecessary cost, complexity and uncertainty to the planning process.

Potential policy responses:

6.19   Understanding heritage significance to inform design
         Oxford has a unique built environment which needs to be enhanced and protected. Good design will start with an understanding of existing context. In Oxford it is particularly important that design takes place with a full understanding of the significance of heritage assets that may be affected. In order to properly understand heritage significance, it will be helpful if the Local Plan or supporting documents give guidance on what is locally important and should be protected and enhanced.

A good understanding of heritage value will be required to ensure continued development pressure does not adversely affect heritage assets.

Opt 70: High Buildings, view cones and high building area

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue to define view cones and a high buildings area but instead of a rigid height limit introduce a set of criteria for assessing the impact of proposals on the skyline (based on the View Cones Study).	A strong emphasis on a height restriction can lead to all buildings being built to the maximum height, without enough regard to what height works best in a particular location, and also with the potential consequence of creating a very flat, monotonous and uninteresting roofline. This also risks preventing new potentially positive interventions on the Oxford skyline from coming forward. A new criteria-based approach should ensure that, instead of a blanket approach, full consideration is given to how new development will impact on the skyline. This will open up the opportunity for new taller buildings that make a positive impact on the skyline. It will ensure that efficient use of land is encouraged, but not to the detriment of the unique character of Oxford's urban environment and in particular views of the 'dreaming spires'. A policy requirement for a Visual Impact Assessment, especially for larger developments, will be considered as this will help ensure effects are understood. The policy will need to refer to issues such as roofplant and massing. The buildings that are important in the skyline are identified and proposals would be required to show the impact on those.
B) Alternative Option: Continue with the current policies that limit the height of buildings in the view cones area and central 'high buildings area'.	A strong emphasis on a height restriction can lead to all buildings being built to the maximum height, without enough regard to what height works best in a particular location, and also with the potential consequence of creating a very flat, monotonous and uninteresting roofline, which actually detracts from the skyline that the aim is to protect.
C) Rejected Option: Remove all height restrictions in policy. Do not have a specific policy to protect views of the skyline.	It is likely this option would lead to increased heights in areas where there are currently controls, in the city centre particularly. This option could enable significantly more development in the city centre. However, it could lead to significant harm to the historic environment and views into and out of Oxford, damaging its uniqueness.
D) Rejected Option: Review view cones and remove those where views have been lost because of trees etc.	The views from certain viewing locations have deteriorated over time, mainly because of trees. However, it is likely that management could enhance the view again so they are not irreparably lost.

Opt 71: Listed buildings and their setting

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a listed building policy in-line with the NPPF, which requires assessment of the significance of an asset, whether proposals will cause harm to this and whether harm can be mitigated or is outweighed by public benefit Introduce criteria that require an assessment relevant to Oxford.	This option would help preserve and enhance buildings and structures of architectural or historic interest and their setting. This approach could ensure development would respect, maintain and strengthen local distinctiveness and sense of place, promote high quality urban design particularly with regard to distinctive features and character of Oxford. The details of the policy could also refer to details such as alterations for fire safety, accessibility and sustainability.
B) Alternative Option: Include a listed building policy in-line with the NPPF, which requires assessment of the significance of an asset, whether proposals will cause harm to this and whether harm can be mitigated or is outweighed by public benefit.	This option would help to ensure development will respect, maintain and strengthen distinctiveness and sense of place and promote high quality urban design. It would help preserve and enhance buildings and structures of architectural or historic interest and their setting. This option would not include a criteria requiring an assessment of the asset's relevance to Oxford. This option would be, in effect, relying on the NPPF policy only.
C) Rejected Option: Do not have a policy relating to listed buildings and their setting, but rely on national planning policy and other regulatory regimes.	The NPPF provides guidance and protection in line with option b. However, not including a policy in the Oxford Local Plan will mean that the opportunity to reflect local circumstances would be lost.

Opt 72: Assets of Local Heritage Value

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that requires development to consider heritage assets of local importance. The policy would also set out criteria for the assessing whether an asset has locally important heritage interest.	This policy will ensure that heritage assets of local importance will be a material consideration when determining planning applications. Locally important heritage assets can be added to the list when they are identified. The criteria will help understanding when assessing planning applications as to whether there is a heritage asset that should be added to the list. The City Council's nomination form for heritage assets already sets out criteria, including that the asset must possess heritage interest that can be conserved and enjoyed, must have a value as heritage for the character and identity of the city or area or community and they must have a level of significance that is greater than the general positive characteristics of the local area that have been identified.
B) Alternative Option: Do not include a policy relating to assets of local heritage importance but rely on national planning policy.	The NPPF affords some protection even without a specific local policy. The NPPF says that heritage assets that make a positive contribution to local character or sense of place but which are not nationally designated or in a conservation area can be offered some protection by being identified on an adopted list of local heritage assets.

Opt 73: Conservation areas

Policy approach	Consequences of approach/discussion
A) Preferred option: Identify Conservation Areas and include a general policy approach to determining applications in conservation areas in Oxford.	Setting out considerations relevant to applications in Conservation areas will help to add clarity. This approach will give the opportunity to put a local emphasis on assessing significance and can make reference to management.
B) Rejected Option: Identify Conservation Areas but do not include a general policy, instead rely on Conservation Appraisals, national planning policy and other regulatory regimes.	The NPPF and other national regulations provide some guidance. However, not including a policy in the Oxford Local Plan will mean that the opportunity to reflect local circumstances would be lost.

Opt74: Important parks and gardens

Policy approach	Consequences of approach/discussion
A) Preferred option: Do not include a policy relating to important parks and gardens but rely on other policies of the Local Plan.	Oxford has 15 registered parks and gardens. These Historic parks and gardens are protected at a national level. There is not considered to be any particular local commentary required relating to these areas. Several of these parks and gardens have been assessed as being part of the Green Infrastructure network.
B) Alternative Option: Include a policy in the Local Plan protecting important parks and gardens	There is not scope for a policy that does much more than repeat national guidance relating to already protected areas, so there are not obvious benefits to including this policy.

Opt 75: Scheduled Monuments

Policy approach	Consequences of approach/discussion
A) Preferred option: Do not include a policy on Scheduled Monuments, but rely on national planning policy and other regulatory regimes.	Oxford has 10 Scheduled Monuments, which are the City Walls, the Castle, Seacourt Medieval Settlement, Osney Abbey, Rewley Abbey, Godstow Abbey, the Swing Bridge, Old Abingdon Road Culverts, a section of Grandpont Causeway, and the ring ditches and burrows of Port Meadow. The NPPF and other national regulations provide sufficient guidance on protection and enhancement of these and Historic England also maintains a register for assets at risk (currently the Swing Bridge is one of only two assets on the at risk register).

B) Alternative Option: Include a policy to say that development must not have an unacceptable impact on a nationally important monument.	There is not scope for a policy that does much more than repeat national guidance relating to already protected monuments, so there are not obvious benefits to including this policy. The options below on 'Provisions for sites that include archaeological remains' address non-scheduled monuments of national significance and Oxford's distinctive archaeological legacy.

6.20   Archaeology

Oxford has a rich archaeological heritage, from prehistoric times to the modern day. This archaeology has the potential to aid understanding of our heritage. It is vital in Oxford that opportunities to investigate archaeological remains are fully realised when development takes place. The options below are designed to ensure that development results in a thorough investigation of archaeology where this is relevant.

Opt 76: Defining areas likely to have archaeological deposits

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Continue to define a city centre Archaeological Area as an area where it is suspected archaeological deposits will exist, and where information defining the extent and character of deposits should be included in an application.	This is a long-standing policy approach. The magnitude and wealth of deposits in the area means that any groundworks are likely to have an impact on archaeology, so is sensible to identify this area in policy.
B) Preferred option (Combination of A + B)**:** Highlight (Outside of the city centre Archaeological Area) where there is a strong likelihood of archaeological deposits within allocated development sites, for example with a symbol within the policy as in the current Sites and Housing Plan.	This will alert developers to the potential archaeology on allocated development sites enabling early consideration to be given to this matter. However, this approach would not enable easy, early identification of the likelihood of deposits in areas outside of the city centre Archaeological Area and outside of allocated development sites.
C) Alternative Option: Define other areas (outside of a city centre Archaeological Area) that are also highly likely to contain archaeological deposits and should therefore provide information in a planning application.	This will alert developers to the potential archaeology in areas of the city outside the city centre with a strong potential for there to be archaeological deposits enabling early consideration to be given to this matter. However, because the identification of the likelihood of archaeological deposits would rely on an array of data sources, it will be difficult to precisely identify boundaries for these areas on the Policies Map.

Opt 77: Provisions for sites that include archaeological remains

Policy approach	Consequences of approach/discussion
A) Preferred option: Set out requirements for dealing with known archaeological remains of national or local significance. Specifically, require that the potential harm of cumulative impacts is considered (in the central archaeological area), and whether this can be mitigated through recording and publication of results. Consideration should be given to provisions for storage where necessary.	It is important that there is a policy to address Oxford's distinctive archaeological legacy. Recording and publication is likely to be important. In many cases it will be preferable if the remains can be preserved in situ. Where this is not possible, sometimes consideration will need to be given to the adequate recording and publication of archaeological information and storage of deposits. The concentration of archaeological assets in Oxford, as well as the strong development pressures, mean that cumulative impacts could begin to have negative effects if not properly considered. This policy approach would ensure that the type of deposits of national or local deposits could be highlighted, and also how they should be dealt with in a way appropriate in Oxford, including in terms of cumulative effects. The management and conservation of non-designated nationally significant assets will require particular consideration, including those that collectively make a major contribution to Oxford distinctiveness, encompassing assets associated with the 1st and 2nd terrace ritual and funerary prehistoric landscape, the local Roman pottery manufacturing industry, the development of the late Saxon town and the medieval University, medieval religious institutions and the urban defences.

| B) **Rejected Option:** Do not include a policy on requirements for how archaeological remains should be dealt with but rely on national planning policy. | This approach would result in reliance on national policy. It would mean that the Local Plan would not have a marker as to how archaeological remains should be considered and the opportunity to give an Oxford perspective would be lost. |

Opt 78: Archaeological remains within listed buildings

Policy approach	Consequences of approach/discussion
A) **Preferred option:** Do not have a policy on archaeological remains in listed buildings, but rely on national planning policy and other regulatory regimes.	General policies relating to archaeological remains will apply to remains within and outside listed buildings, so there is little need for a specific policy. The policy that defines areas that are likely to have archaeological remains could reference listed buildings, which would ensure the potential for remains to exist is flagged up early.
B) **Alternative Option:** Have a policy that requires a programme of investigation, recording and publication where it is considered a listed building (that is subject to an application) conceals archaeological remains (to be secured by condition).	In many cases, work on a listed building will not require groundworks. If it does, other policies relating to archaeology will apply.

7. Ensuring efficient movement into and around the city

7.1   *Objectives*
   • To ensure growth in the proportion of people walking and cycling to access jobs and facilities
   • To provide enhanced facilities for walking and cycling, ensuring they are the primary modes for travel around the city
   • To ensure walking and cycling routes are complemented with well managed and attractive public transport routes, and that car use is minimised

Ensuring efficient movement around the city

National Planning Policy says:

7.2   The *National Planning Policy Framework* (NPPF) states that one of the overarching land-use planning principles is to "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable" (paragraph 17). The NPPF directs local authorities to move away from widespread private car usage being the basis of transport networks, towards more sustainable modes as a means to both improve the sustainability of the transport network and issues around emissions and congestion. The NPPF outlines that sustainable modes of transport should be prioritised, with priority being given to cyclists and pedestrians, (paragraph 35) with high quality public transportation also sought. The *Planning Practice Guidance* (PPG) sets out more detail on the use of travel plans and transport assessments and on the need for transport evidence in plan making.

7.3   The government's Manual for the Streets, 2007, encourages increased connectivity and walkability between residential neighbourhoods, transport hubs and community services and facilities as a way of reducing people's reliance on the private car, and improve congestion, (paragraph 4.4.2). Mixing the uses of neighbourhood areas is encouraged as a way of reducing people's need to travel.

The Oxford story – background evidence and the Sustainability Appraisal:

7.4   Transport remains a critical issue for Oxford. Transport and movement requires the involvement of a range of authorities and providers to affect change. The County Council has overall responsibility for transport policy as the Local Highway Authority and Highways England have the statutory duty to plan for and manage the strategic road network. The City Council in its capacity as Local Planning Authority has a key role to deliver change to the movement network through placemaking.

An environmentally sustainable city

An enjoyable city to live in and visit

A healthy place

7.5   The clear priority is to promote sustainable travel over private car use so to help alleviate the current issues of congestion and air pollution. The Local Plan will need to be clear in its aim to help deliver growth that is predicated on enhanced pedestrian and cycle (or active travel) routes and high quality public transit routes. It will also need to set out how these aims will be delivered. These aims are strongly supported in the SA *Scoping Report*, 2016, which recognises that Oxford currently has relatively sustainable travel patterns; indeed within Oxford, 68% of journeys are made by a sustainable mode (pedestrian, cycle and bus). Oxford's existing road network has already reached its maximum capacity, resulting in congestion and air quality issues. While traffic counts carried out at the inner cordon (which specifies the average number of vehicles entering the city centre on any given weekday) shows a stable volume of traffic, the outer cordon of Oxford (which indicates the number of vehicles entering Oxford from beyond the city boundary) is experiencing an increase annually. The SA *Scoping Report* supports this and concludes that a continuation of existing travel behaviour, especially considering Oxford's potential growth over the plan period, would over-burden the transport network and compromise both Oxford's character and the quality of life of residents.

7.6   The *Oxford Transport Strategy*, prepared by Oxfordshire County Council, as part of the *Local Transport Plan: Connecting Oxfordshire 2015-2031* (LTP), includes various objectives intended to improve the sustainability of the regional transport network. Perhaps the most relevant to the Local Plan are the re-opening of Cowley branch line to passengers, improving Oxford's cycleways and improving mass transit links between park and rides which bisect the city centre. Oxford City Council's response to the LTP suggested these objectives were a progressive package of aims but more radical policies were needed, something the Local Plan could offer. In its response, Oxford City Council added further key objectives such as the city's transport network placing far more emphasis on walking as a transport method.

7.7   The County Council's *Local Transport Plan*, background evidence and the *Sustainability Appraisal*, all point towards the necessity of encouraging/ enforcing a behavioural change in travel patterns in Oxford and a further shift away from reliance on private cars towards more sustainable modes. It is important that policy responses continue to support the high proportion of journeys made by sustainable travel modes, through continuing to make this the most attractive transport option, while seeking to improve active travel networks. The high volume of car traffic into Oxford originating from outside the city also needs addressing in policies which encourage a change of mode and encourage people out of their cars. The council will continue to support the investigations by the National Infrastructure Commission into transport improvements in the Oxford to Cambridge corridor including the first/last mile transport challenges within those cities.

7.8   The SA highlighted how policies which promoted sustainable travel choices would be likely to result in reduced reliance on car travel and hence have positive impacts on the SA objectives of human health, air pollution, and climate change in particular. In addition such an approach would help with poverty, social exclusion and inequality as sustainable choices are generally cheaper and would also open up access to more opportunities (e.g. to access jobs and social infrastructure) for more people. However, the SA highlights a potential negative impact on the economy and tourism in particular if the approach is taken to further restrict access to the city centre which could compromise footfall and thereby affect the vitality of this area.

The clear priority is to promote sustainable travel over private car use so to help alleviate the current issues of congestion and air pollution.

Responses to first steps consultation:

7.9 The Issues stage consultation revealed many concerns about transport in and around Oxford. This was regarded as a critical issue which needs addressing with a strong policy direction. Stakeholders expressed concerns with Oxford's existing transport capacity and made various suggestions, such as enhanced Park & Ride facilities and congestion charging.

7.10 Many respondents raised concerns with cycleway safety and connectivity while 66% of respondents strongly agreed with the necessity of segregating cycle and pedestrian routes from vehicular traffic as a means of achieving these aims.

7.11 Regarding public transport, most concerns were levelled at the bus services within Oxford with many people raising concerns towards the unaffordability of services and others adding that improved routes, connectivity and reliability are key issues.

7.12 Poor air quality, resulting from vehicular emissions, is of great concern to Oxford's residents with many mentioning concerns over air quality specifically; 65% of people either agreed or strongly agreed that more restrictive emissions policies were required to combat air pollution.

Potential policy responses:

7.13 Understanding and mitigating the transport implications of developments
It is important the transport impacts of a proposed development are appraised and considered as part of the determination of a planning application. Two key tools for this are Transport Assessments and Travel Plans. A Transport Assessment (TA) is a comprehensive and systematic process that sets out transport issues relating to a proposed development; it identifies the impact of the development in 'person trips', which are then broken down by transport mode. A Travel Plan is a package of actions designed by a workplace, school or other organisation to encourage safe, healthy and sustainable travel options.

> **It is important the transport impacts of a proposed development are appraised and considered as part of the determination of a planning application.**

Opt 79: Transport Assessments and Travel Plans (include servicing and delivery plans)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Require TAs and TPs to review transport impacts and show transport measures proposed to mitigate them for all development that is likely to have significant transport implications.	This approach will encourage measures which reduce the need to travel and manage congestion. In addition, more sustainable modes of travel are promoted as part of these assessments. Transport Assessments should include, for example, targets associated with the proportion of journeys made to and from the development site by more sustainable alternatives to the private car and measures such as bus passes.
B) Preferred option (Combination of A + B)**:** Require transport assessments to also include servicing and delivery plans, where relevant.	Including service and delivery plans as part of the assessment process will also help reduce the impacts of freight and service vehicles by requiring measures to minimise these issues, such as managing delivery times. This is particularly important in busy and confined areas such as the city centre and also for sites in close proximity to residential areas.
C) Alternative Option: Do not include a policy requiring transport assessments.	The assessment and mitigation of transport impacts of development schemes are crucial to their success or failure. Requiring an assessment as part of a planning application is the only way to secure the required information on which to make a sound planning decision. Without management of traffic impacts there would be an increase in congestion and a lack of encouragement and provision for active travel.

7.14 Encouraging walking, cycling and public transport
The following options tables address transport issues that cannot wholly be delivered by the City Council through the Local Plan. These options are particularly reliant on other parties, including the County Council as Local Highways Authority as well as service operators. However, the City Council is working closely with the County Council in order to ensure that a transport strategy is in place that will support the Local Plan. A key aspect of the transport strategy will be the aim to increase the attractiveness of walking and cycling so that they are the predominant means of travel within the city, which will require improvements to facilities and particularly improvements to routes to ensure that there is a comprehensive network of safe routs for walking and cycling across the city. The reopening of the Cowley Branchline for passenger services would bring obvious benefits for the city, and the likelihood of growth and intensification of uses at the Science Park, Business Park and in Blackbird Leys would all help support the case for its delivery. However, it cannot be delivered by the Local Plan. These options have been included for testing through the Preferred Options process as they are considered to be of particular significance to the future operation of Oxford and as the Local Plan can at least assist in their delivery.

Opt 80: Supporting city-wide pedestrian and cycle movement

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C + D)**:** Identify key links in the pedestrian and cycle network for completion or improvement and require these as part of development through site allocations.	This approach will benefit the general accessibility and thereby permeability of Oxford on foot and by bicycle which will encourage active travel. This in turn will increase the health of Oxford's residents and work force while also alleviating congestion by reducing use of private cars. Potential cycle routes to be introduced or improved are shown on the map below.
B) Preferred option (Combination of A + B + C + D)**:** Require developers to demonstrate how their proposals connect to the city pedestrian and cycle network.	This approach will mean that new developments are likely to have good connectivity for active travel which will both reduce car travel and associated congestion while also encouraging a healthy lifestyle. This approach would ensure that future development has good connectivity and provision for active travel modes.
C) Preferred option (Combination of A + B + C + D)**:** Require developers to demonstrate how their street design ensures a good walking environment.	This would apply to larger new developments that result in the creation of new streets, or that require significant new public realm improvements to existing streets. It will help to promote active travel through requiring developers to create an environment that makes walking an attractive option for residents/workers. The walking environment affects everyone's experience of moving around the city. As well as being a mode of travel in itself, walking is used to access other modes such as buses, trains, cars and cycles. The design of the pedestrian environment should ensure there is space for walking, passing, meeting and street furniture, aiming to make streets a place to spend time and enabling community cohesion, rather than focusing simply on them as somewhere for people to travel through.
D) Preferred option (Combination of A + B + C + D)**:** Require developers to demonstrate how their street design ensures a good cycling environment.	Improving the cycling environment will help to promote active travel through requiring developers to create an environment that makes cycling an attractive option for residents/workers. Good highway design is important so that people can cycle directly and be and feel safe, so that cycling becomes the chosen choice more often. As well as a connected network of routes, it is important that streets are designed to properly accommodate cyclists, and in many cases good cycle provision will require a dedicated cycle facility.

Map 3: Potential local cycle routes to be implemented and improved. This would create a network of routes that connect to premium cycle routes and to main centres, transport hubs and areas of employment

Legend

— Local Cycle Connection Routes

— Cycle Premium Routes

— Cycle Super Routes

— Connector Cycle Routes
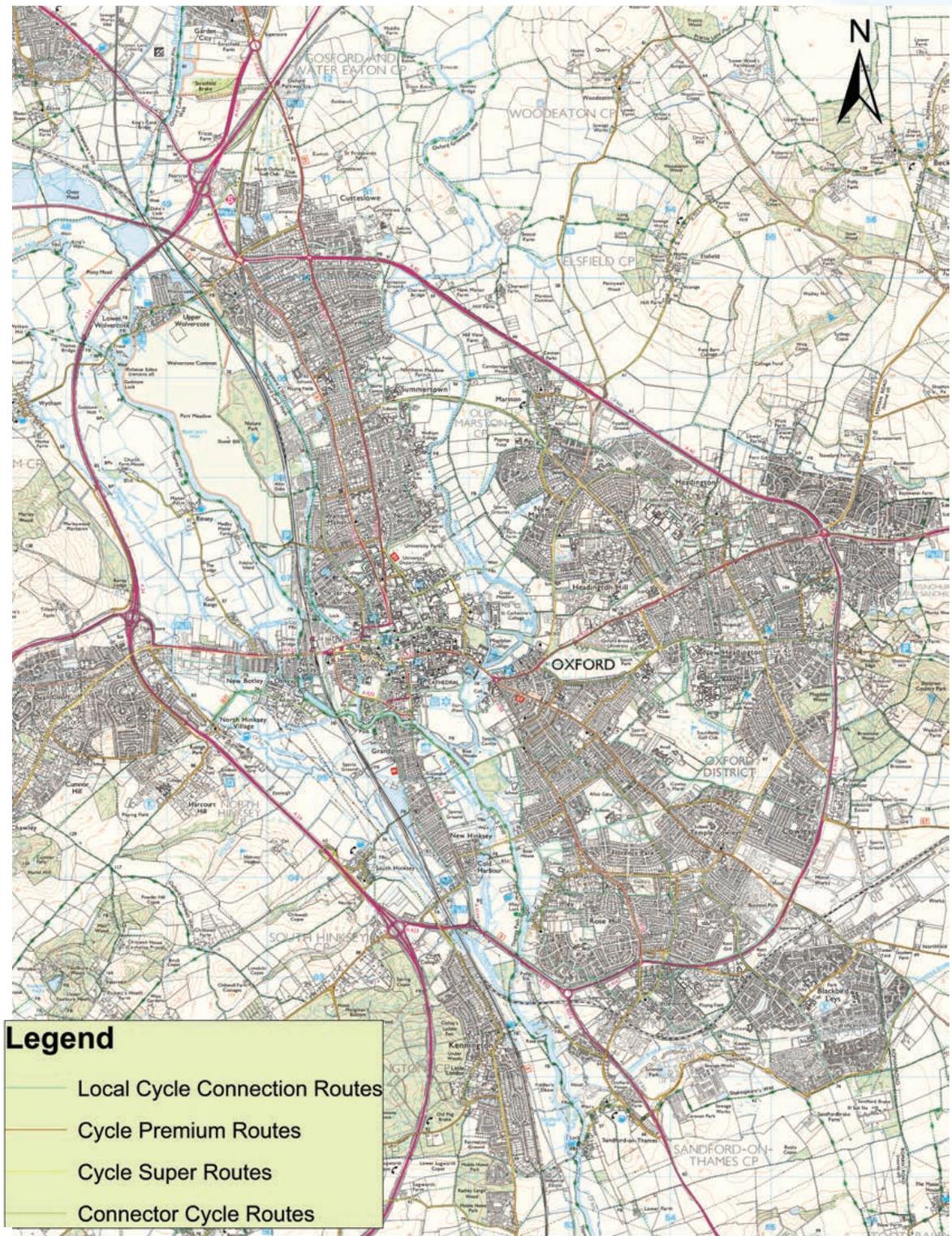
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Opt 81: Supporting walking, cycling and public transport access to new developments

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Introduce a travel hierarchy to prioritise walking, cycling, then public transport, then electric vehicles and car share then car share/car clubs over private car use, for example by reallocating road space.	This option encourages sustainable forms of transport over other modes, reducing emissions and improving air quality. Including public transport as a priority alongside walking and cycling is likely to be more effective in terms of changing behaviour rather than focussing entirely on pedestrians and cyclists, as this will also help manage medium to longer distance travel, whereas walking and cycling is focused on much shorter distances. Public transport is inclusive as it offers a more sustainable mode for those with mobility issues. Additionally it offers a broader range of options for those that the policy is trying to tempt out of their cars.
B) Preferred option (Combination of A + B)**:** Require specific access measures to improve access by walking, cycling and public transport to allocated sites through their allocation policy.	The allocation policies for the larger sites (which is likely to include larger employment sites such as the Science Park and hospitals) offer an opportunity to identify site-specific access measures to address these issues alongside the more general policy. This would have significant benefits in terms of locally specific solutions and in terms of offering clarity for the developer. This is likely to include provision of new walking and cycling routes and access points that better connect to the wider transport network. Helping commuters to make sustainable travel choices is likely to be a key element of the strategy to change overall behaviours. Identifying specific improvements to the networks which link into areas of employment is likely to significantly assist with this aim. This could take the form of specific measures being identified in the site allocation policies for major areas of employment for example (this would be dependent on the options selected for those areas).
C) Alternative Option: Do not include specific measures in site allocation policies but rely on general access and transport policies.	This approach would miss the opportunity to identify bespoke site specific solutions for traffic mitigation for the major sites in the city. Instead it would involve relying on the general policy approach, leaving such solutions for discussion at the planning application stage. It is likely to be more effective to identify a local issue/measure at the earliest possible stage ie. site allocation.

Opt 82: Tourist coaches

Policy approach	Consequences of approach/discussion
A) Preferred option: Provide facilities just outside the city centre to the North/ South for tourist coach drop off and pick up, with tourist coach parking provided at Park and Ride sites or other suitable locations that can be identified, likely to be on the edges of the city.	This option seems to strike a reasonable balance between supporting tourist access to the historic city centre and limiting the effect of tourism coaches on Oxford's arterial roads, assuming these facilities for coach drop-off points are suitably located. Additionally, this option will both protect the setting of the historic city core by limiting coach traffic through it while also permitting relatively easy access for visitors. It will be important that locations for drop off and pick up facilities are considered in conjunction with the zero emission study, as this will affect how far from the centre facilities can be located.
B) Alternative Option: Only provide facilities at Park and Ride and ask tourist groups to use service buses as their connection into the city centre.	This approach would give the best outcome in terms of preserving the character of Oxford's city centre and limiting the detrimental effect tourist coaches have on the city centre. However, the feasibility of this option in terms of providing sufficient services for large tourist groups would be difficult to predict and manage and would likely impact on current users of these services. This solution could be less attractive to tourists and tour operators, although a dedicated, state-of-the art bus showcasing zero-emission technology could help to make the proposition attractive for tourists.
C) Rejected Option: Continue to provide facilities within the city centre for drop-off and pick-up.	This option reflects the current situation, which has a negative effect on the setting of Oxford's city centre as well as adding to the traffic on arterial roads. While this option grants tourists direct access to key visitor attractions, it does have significant negative effects to the local environment. It is likely to conflict with ambitions to introduce a zero emission zone in the city centre.

Opt 83: Scheduled coaches (i.e. long distance coaches to London and the airports)

Policy approach	Consequences of approach/discussion
A) Preferred option: Assess whether there could be a change to where the scheduled coaches stop and circulate around the city centre, with the particular aim of avoiding the High Street.	This option does provide direct access to the city centre without needing to change bus, which will encourage visitors as well as improve the commuting possibilities both in and out of central Oxford. It will ensure those in east Oxford who are used to being able to board the bus easily will continue to do so, and it should mean no increase in people deciding to drive to the Park and Ride to access the bus. However, the impact of the very large coaches on the historic High Street is significant, so if an alternative route and termination point can be found, that would be highly beneficial. The Zero Emission Zone study recommendations will affect implementation of this approach; it is likely that any vehicle entering the city centre will need to be able to operate without creating emissions in the future.
B) Alternative Option: Terminate scheduled coaches (those to London and potentially also those to the airports) at Thornhill Park and Ride to reduce number of vehicles in the city centre. Use other bus services to provide the link to the terminus. This option could allow coaches access into the city centre at night when normal services from the park and ride site and traffic levels in the city centre are both reduced.	The need to change buses, often twice for those intending to use scheduled coaches and not with access to existing bus services to Thornhill, would mean access use of scheduled coaches is less convenient, which may deter its usage for visitors and commuters. It may also encourage car use from within Oxford to the Park and Ride. However, passengers will be disembarked at a major transport hub which can provide quick access to the city centre. This option will offer significant benefits by cutting coach traffic from Oxford's arterial routes and the city centre. Coaches are the largest vehicles on city centre roads.
C) Alternative Option: Reduce the number of intermediate stops between city centre and Thornhill Park and Ride to ease congestion on arterial routes, for example so buses don't stop in the High Street or St Clement's.	This will mean a continuation in volume of traffic along the London Road and High Street. It could ease congestion slightly by ensuring coaches are stopping less frequently while offering the continued benefits of having direct access to the city centre.
D) Alternative Option: Find an alternative terminus within city but outside of city centre core.	This option would be dependent on a potential location being identified; no work has yet been done to see if there is any potential location. Depending on the locations of the coach terminus, this option could offer ease of access to the city centre while improving congestion issues. However, this may still cause traffic issues along Oxford's arterial roads due to maintained coach traffic.

Opt 84: Safeguarding Cowley branch line

Policy approach	Consequences of approach/discussion
A) Preferred option: Safeguard land that would be required to deliver the potential expansion of the Cowley branch line into a passenger railway line and the potential new stations.	If the expansion of the line were to be achieved, it would benefit existing employers in the area, those who currently commute there and those who live in the area offering an attractive alternative sustainable travel option. It could also attract considerable investment into the area. This will also encourage the use of trains for long distance travel through connections via Oxford Railway Station as well as travel to central Oxford from areas to the south around Littlemore, which is a more sustainable option.
B) Rejected Option: Do not include a policy to safeguard any land for the Cowley branch line.	If the opportunity to expand the Cowley branch line were lost then it could limit the potential investment in southern Oxford. Whilst the funding and timing of the delivery of a passenger line is currently uncertain, it would not be appropriate to release land that might be required for its delivery to other uses given the significance of the potential benefits of the line.

Parking

7.15 A 2015 written statement to parliament be read alongside the NPPF said that: "Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network." Paragraph 39 of the NPPF says that, if setting local parking standards for residential and non-residential development, local planning authorities should take into account the accessibility of the development, the nature of the development, the availability of public transport, local car ownership levels and an overall need to reduce the use of high-emission vehicles.

The Oxford story – background evidence and the Sustainability Appraisal:

7.16 Since the introduction of a low emission zone in Oxford in 2014 there have been improvements to air quality. However, levels of air pollution still exceed target levels in some areas, in particular in the city centre, at junctions on the ring-road and in the district centres. The city also suffers from areas of traffic congestion. The impacts of motorised traffic and also the need to make best use of land suggest low car parking levels are required.

7.17 Oxford's existing cycle and car parking standards have been compared to the comparable locations of Bath, Brighton, Bristol, Cambridge, York, Westminster and Islington. This comparison looked at residential and non-residential parking and other aspects of policy, for example how standards vary across areas. Car-free residential development is broadly supported in all comparison areas. Oxford's residential parking standards are broadly similar to the comparison areas. There are variations for non-residential parking standards, but Oxford's current standards for employment (office) use are generally quite high.

7.18 The SA highlighted how policies which limited the amount of car parking (whether that be residential, non-residential or public) would be likely to result in reduced reliance on car travel and hence have positive impacts on the SA objectives of human health, air pollution, and climate change. In addition such an approach would result in more land being available for the provision of priority uses such as housing or open space. However, the SA highlights potential negative impacts on the economy if levels are held too low and notes that Lower levels of residential car parking and 'car-free' developments may adversely impact less affluent households where dwelling occupancy levels may be higher than expected. It also notes however the impacts of this may be less significant in hub locations with good public transport links.

Responses to first steps consultation:

7.19 The majority of respondents agreed or strongly agreed that number of car parking spaces should be limited in new residential developments (114 compared to 48 neutral and 64 disagree or strongly disagree). There were very similar results for the same question on limiting parking spaces in new workplaces. A few respondents commented that car free developments don't work for family housing, as families need a car. Other groups considered to need a car were also referred to, including midwives, tradesmen, disabled and elderly.

The impacts of motorised traffic and also the need to make best use of land suggest low car parking levels are required.

7.20   Several respondents were concerned that encouraging high-density housing will increase parking problems, although the comment was also made that less space should be given to cars. A few said that there should be less residential parking available if the development is located on a bus route and a few thought all encouragement should be given to reducing car use, including through parking restrictions.

7.21   Parking to support shops and leisure was seen as important and parking and a few respondents mentioned parking at the hospitals.

Potential policy responses:

7.22   Levels of car parking have a number of important impacts. Car parking uses land, and in a compact city such as Oxford where land is scarce and there are so many competing demands on the land, consideration should be given to minimising parking to ensure efficient use of that land. Different approaches will be needed for provision and management of different types of car parking. For example, private residential parking could be minimised through introduction of car-free development and car clubs; a workplace parking levy (currently being considered by the County Council) could help in minimising private workplace parking; and public parking could be restricted or repurposed for other uses.

7.23   Provision of parking spaces can affect the urban design and feel of a place. For larger developments with new streets, it would be expected that the majority of car parking would be unallocated car-parking on-street.

7.24   Cycle and car parking levels in private developments
         The Local Plan can set out the number of parking spaces permitted for new developments. Parking levels can influence urban design, efficient use of land and transport choices, so this is an issue that should be addressed in the Plan. To achieve this effect it is essential that there are viable alternatives, which is certainly the case across most of Oxford. A potential unintended effect of low or no car developments could be that surrounding streets are used for parking instead, creating a nuisance for local residents. This potential negative effect is mitigated if there is a Controlled Parking Zone (CPZ). The Local Plan cannot implement CPZs, so options relate to whether they should be supported in the Plan.

> **A potential unintended effect of low or no car developments could be that surrounding streets are used for parking instead, creating a nuisance for local residents.**

Opt 85: Car parking standards – residential

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B + C)**:** Set low maximum/optimum car parking standards. Allow 'car free' residential development across the city (as long as there is a CPZ).	The majority of the city has an excellent existing level of public transport provision, as well as good connectivity by walking and cycling, so car-free developments are feasible. Criteria could be included in the policy to ensure the development is well enough connected to support car free or low car housing, either by existing connections or provision of new connections. In a Controlled Parking Zone any potential negatives with unsociable parking in neighbouring streets can be avoided. A low standard for car parking provision means that a greater proportion of scarce land can be used for providing homes, and also avoids issues of parking creating poor urban design. Reduced car parking and therefore car ownership and car trips is likely to reduce air pollution and noise levels. Fewer cars using the roads improves the attraction of walking, cycling and play. The policy will need to allow or require some parking, for example for disabled and visitor parking, ensuring there are not negative consequences for accessibility for the elderly, disabled and vulnerable groups. This may not need to be allocated.

Policy approach	Consequences of approach/discussion
	'Car-free' residential developments should be considered in dense urban areas where residents are well served by public transport and can use sustainable travel options. Developers can choose not to provide private off-street parking places or a local authority may require a developer to comply with an agreement not to provide off-street parking as part of planning permission. Action by the local authority will be necessary to prevent on-street parking at that location, or overspill to nearby areas. High bike parking standards will be particularly important with this option, and sufficient provision for powered two-wheelers will also need to be considered.
B) Preferred option (Combination of A + B + C)**:** Require the provision of electric vehicle charging points on all homes with a private drive and a % on roads with unallocated parking.	A move towards cars with reduced or zero emissions will help mitigate continued car use. Requiring charging points to be provided is one way to help support their uptake and use. Current 'best practice' is to have at least one charging unit for each home with a dedicated parking space and at least 1 charging point per 10 unallocated spaces. There should also be appropriate cable provision to prepare for increased demand in future years.
C) Preferred option (Combination of A + B + C)**:** Include a policy that provision of car clubs will be supported.	Car-clubs can help enable people to give-up personal car ownership and promote the attractiveness of car-free or low-car developments. Provision of on-street or dedicated parking facilities could encourage car-clubs. Electric parking facilities at car club parking spaces could increase access and availability of electric cars. Car-club provision is likely to be strongly reliant on there being interest from a car club operator, and this will not be forthcoming in all locations.
D) Alternative Option: Set fairly low maximum/optimum car parking standards. Allow 'car-free' residential development near to facilities and transport hubs and along public transport corridors only (in Controlled Parking Zones).	As most areas of Oxford have access to excellent public transport provision and access to walking and cycling networks, it is not necessary to limit car free developments to a few areas of the city; they will be viable in most areas.
E) Rejected Option: Set low car parking standards for smaller units only.	The nature of the housing market in Oxford means that it is likely to be too simplistic to take this approach. This may not meet the needs of those living in smaller units who require parking. It would allow ownership of a car by families in larger units, but not by those in smaller units, which may be less affluent families or elderly for example.
F) Rejected Option: Set higher maximum car parking standards similar to standards across the rest of Oxfordshire.	This would result in the least efficient use of land, and could lead to compromised design as space is made for parking. It would provide for those who require car use, but also enable car use where it is not necessary; it would not reflect the sustainable nature of Oxford and how accessible the city is.

Opt 86: Car parking standards – non-residential

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Set low maximum/optimum car parking standards. Allow low car development across the city (as long as there is a CPZ) and allow only low car (operational and disabled parking) development near to transport hubs.	The details of this approach would vary depending on the exact type of use, although the most important factor will be the location; uses that attract high numbers of people should be located in the city and district centres in order to reduce car travel because of their accessibility to highly sustainable travel networks and central position within wider residential areas. All retail development (including restaurants, take-aways, food and non-food retail), offices, research and development and industrial sites, conference centres, entertainment venues, leisure centres, libraries, community centres, halls and places of worship should be in accessible locations precisely so that there is minimal need for travel by car, and therefore parking. The hospitals have a particular need for visitor parking. The hospital locations in congested residential areas mean that increasing on-site car parking provision to meet all staff and visitor needs is not desirable. Other solutions including

	innovative management approaches and provision of staff car parking away from the hospital sites should be considered. If site-specific policies are included for larger sites to cover a range of issues, there will be scope to promote rationalisation of parking provision on the hospital sites, for example into shared multi-storey car parks.
B) Preferred option (Combination of A + B)**:** Require the provision of electric vehicle charging points on non-residential developments.	Policy could require, for example, that at least 10% of permitted parking at a non-residential development should have an electric charging point, with appropriate cable provision for expected increased demand in the future. A move towards cars with reduced or zero emissions will help mitigate continued car use. Requiring charging points to be provided is one way to help support their uptake and use, and charging points will be needed at destinations with car parking, as well as at homes.
C) Rejected Option: Set higher maximum car parking standards similar to other Oxfordshire districts' standards.	Oxford's standards for employment parking are already higher than other comparable locations such as Brighton, Bristol, Cambridge and York. Staff parking at the hospitals is similar to other locations, although visitor parking is more generous. In a city such as Oxford that suffers from traffic congestion, relaxing parking standards is not appropriate. More parking spaces will result in more people driving, which will worsen congestion and reduce air quality.

Opt 87: Controlled parking zones (CPZ)

Policy approach	Consequences of approach/discussion
A) Preferred option: Support introduction of CPZs in areas of the city not covered currently, so that the whole city is covered by CPZs.	The Local Plan cannot require a CPZ - it will remain a decision to be taken by the County Council as Local Highway Authority. However, this option would give support and encouragement of an approach which would reduce the number of vehicles entering the city unless they need to and enable low parking across the city. This would help to encourage travel by means other than the car.
B) Alternative Option: Do not include a policy on CPZs.	With this option, the County Council may still decide to introduce CPZs to cover areas of the city that currently remain without one, but the opportunity will not be taken to promote this and to show the potential of CPZs to bring positive benefits in conjunction with other policies.

Opt 88: Cycle parking standards – residential

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Require high levels of residential cycle parking.	This option will help to encourage cycling, which brings positive benefits in terms of air quality, congestion, greenhouse gas emissions and encouraging active and healthy communities.
B) Preferred option (Combination of A + B)**:** Require specific facilities to facilitate cycle parking – e.g. secure, indoor storage for all new dwellings.	This will help to ensure that new homes meet the needs of those wanting to travel by bike, and make it easier and more attractive for people who wish to travel by bike. A requirement to provide indoor cycle storage may reduce the amount of outdoor amenity space on schemes or impact on indoor space, although separate policy requirements to ensure good standards of provision would help mitigate this.
C) Rejected Option: Lower the standards for residential cycle parking from existing levels.	Lower levels of cycle parking may make it more difficult for people to travel by bike, so there will be reduced benefits in terms of air quality, congestion, greenhouse gas emissions and encouraging active and healthy communities.

Opt 89: Cycle parking standards – non-residential

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Includes minimum standards for non-residential cycle parking set at a high level (likely to be an increase from existing).	Requiring sufficient cycle parking at destinations could further encourage cycling, with associated health and environmental benefits and increasing accessibility of essential services and facilities. This option links particularly strongly to the option to minimise non-residential car parking.

	However, there are currently not enough cycle parking facilities in the city centre and district centres, so greater cycle parking at new destinations within these areas as well as in other locations is required. Oxford already has lower levels of cycle parking requirements at hospitals than other comparable cities, and the ambition to manage traffic generation from the hospitals should be matched with increases in cycle parking provision.
B) Preferred option (Combination of A + B)**:** Require specific types of cycle parking provision and facilities at major employment destinations to facilitate cycle parking e.g. showers and lockers.	Showers are currently required for offices of over 500m^2 and most other uses over 2500m^2 Similar thresholds are likely to be used. This option helps to make active travel to non-residential destinations attractive and feasible. Good cycle parking facilities, such as covered and enclosed areas that are also easily accessible, sited appropriately will help to encourage cycling commutes.
C) Rejected Option: Lower the standards for non-residential cycle parking from existing.	This option is not sensible when there are already reported issues with a shortage of parking, and especially with an aspiration to increase cycling in the city in order to reduce congestion and improve air quality and health.

7.25   Public parking
The availability of public parking facilities will influence the way people travel to centres. A set of options is included for off-street public car parks. There will be those who need to drive or who drive to access certain areas at certain times and for particular types of trips and. The needs of people to access services, and the provision of sufficient parking to ensure the operation and vibrancy of centres, must be balanced against the negative effects of car traffic generation.

7.26   Achieving a step-change in the proportion of people cycling in the city will require increased provision of public cycle parking, particularly in the city centre and at district centres. This can't easily be influenced through local plan policies; therefore, options around public cycle parking have not been included. However, where it is relevant to specific site allocations it can be incorporated into those policies.

Opt 90: Off-street public car parking

Policy approach	Consequences of approach/discussion
A) Preferred option: Don't allow additional off-street public parking spaces in the city centre and district centres.	This option relates to existing permanent spaces in public car parks. It offers the most efficient use of land, as no additional land would be lost to car parking. It avoids increasing negative effects of parking in terms of sense of place and character and it encourages people to travel by other modes, including active travel. Any potentially negative impacts on centres where car parking is found will be minimised if alternative travel forms are readily available and efficient. Minimising car traffic will improve congestion and thus the attractiveness of other travel modes.
B) Rejected Option: Do not limit new off-street public parking spaces in any location.	This option may appear to potentially support provision of essential services and facilities in district centres and the city centre, but the resulting increased car journeys, congestion and air pollution will seriously outweigh any benefits. However, increased car journeys will also have a negative impact on congestion and air quality, which can discourage people from using centres anyway.
C) Rejected Option: Select locations with potential demand for new off-street public parking and allow new public parking spaces in those locations.	This option could potentially lead to increasing amounts of land being lost to parking, although this could be minimised if new spaces were required to be provided on-street, underground or in decked parking. It may have a positive impact on the accessibility of essential services and facilities, especially where there are limited alternative options. However, it would also lead to an increase in car traffic.

8. Ensuring Oxford is a vibrant and enjoyable city to live in and visit and providing facilities and services

OXFORD CITY COUNCIL

8.1   *Objectives*
- Promote district centres as the hubs for local community focus and identity, with transport interchange and activity and provide a range of social, leisure, sport and cultural facilities appropriate to Oxford's diverse communities alongside housing and employment opportunities
- To ensure that development is supported by the appropriate infrastructure and community facilities
- Maintain the regional role of Oxford city centre as a primary focus for shopping, employment, leisure and cultural activities, with district centres playing an increased but complementary role
- To ensure the potential local benefits of Oxford's role as a major tourist destination are utilised

Ensuring Oxford is a vibrant and enjoyable city to live in

National Planning Policy says:

8.2   The *National Planning Policy Framework* (NPPF) states that planning policies should:
- Recognise town centres as the heart of their communities and pursue polices to support their viability and vitality
- Define a network and hierarchy of centres that is resilient to anticipated future economic changes
- Define the extent of town centre and primary shopping areas based on primary and secondary frontages and set clear policies that make clear which uses will be permitted
- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- Retain and enhance existing markets and where appropriate re-introduce or create new ones
- Allocate a range of suitable town centre sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed; then allocate edge of centre sites;
- Recognise that residential development can play an important role in the vitality of centres
- Where centres are in decline, plan for their future to encourage economic activity (paragraph 23).

8.3   The *Planning Practice Guidance* (PPG) sets out a list of "main town centre uses", these are: retail, leisure, entertainment, intensive sport and recreation uses, offices, arts, culture and tourism. The NPPF states that the Plan should define a network and hierarchy of centres together with the

An enjoyable city to live in and visit

A strong community

A healthy place

A prosperous city with opportunities for all

extent of both town centres and primary shopping areas. Within these centres primary and secondary shopping frontages should be defined.

8.4 Local Plans are required to assess and plan for the needs of main town centre uses and adopt a 'town centre first' approach to allocating sites to meet the identified need. A positive approach is needed to improve parking in town centres and where the vitality and quantity is threatened.

The Oxford story – background evidence and the Sustainability Appraisal:

8.5 The Retail and Leisure Needs Assessment (RLA) provides a thorough assessment of the performance of the city and district centres in Oxford. In creating and supporting a viable city, retail and the role of all the centres needs to continue to strive to achieve sustainable economic growth and encourage urban renaissance to deliver sustainable development.

8.6 The RLA shows that all these centres were performing well and each of the district centres had their own distinctive characteristics and strengths but that there was scope through future policy changes to positively promote a greater mix of uses including leisure, residential, employment and community activities.

8.7 The SA highlighted how policies which promote and support the city centre and a wider role for the district centres will have positive impacts on various SA objectives, especially in promoting vibrant communities, poverty, social exclusion and inequality, and essential services and facilities. The SA identified the potential for the loss of local retail facilities if there were no policy protections and it was left to the market to determine and the negative impact that would have. The SA also found that concentrating development in the city centre has the potential to harm the historic character of the area if not suitably managed and designed.

Responses to first steps consultation:

8.8 In relation to the city centre, there was strong support for pedestrianisation in creating a more pleasant environment. Suggestions were made for improvements to specific streets including Hythe Bridge Street, Queen Street and Cornmarket Street. Some were concerned about the need to consider cyclists and the management of these spaces. The impact of the new Westgate on other city centre streets should be reviewed, to ensure the entire city centre is supported to perform strongly.

8.9 District centres were very well supported and the need to enhance the distinct character of each centre, together with the range of facilities on offer was supported. Blackbird Leys, Templars Square (Cowley Centre), Cowley Road, and Headington were highlighted as ones which would benefit from greater range of facilities and creation of some central features. There was support for more local independent businesses and additional community facilities within district centres.

Potential policy responses:

8.10 The Hierarchy of Centres
The city centre will continue to be the major centre for a wide range of town centre uses throughout the plan period. The city centre performs a local function, providing a range of day-to-day facilities for those who live or work in the centre; however it also provides a much wider sub-regional function, offering higher-order facilities for those in the rest of the city and in the wider area. As referenced in earlier sections, the level of demand on

In relation to the city centre, there was strong support for pedestrianisation in creating a more pleasant environment.

the city centre means that there are challenges in terms of congestion and transport capacity. Accommodating more of the forecast need for town centre uses in the city centre will offer benefits in terms of linked trips and in terms of longer distance sustainable travel (for example for those arriving from the wider area by train or by bus from neighbouring towns). Accommodating more growth in an already congested centre will need to be done sensitively and appropriately. It is clear that the city centre will not be able to accommodate all of forecast need for town centre uses.

8.11   Oxford already benefits from an established network of smaller district centres; the Local Plan's vision for the city is that these district centres play an important and extended role in the future and accommodate much of the forecast need for town centre uses. District centres offer the opportunity to provide facilities more locally for communities which can reduce the need to travel and ease the pressure on the arterial routes into the city centre. Including a range of town centre uses in district centres will offer (albeit on a smaller scale) many of benefits traditionally associated with the city centre. These include for example, ease of access (especially by public transport); the capacity for linked trips; a vibrancy related to a varied range of uses; activity throughout the day and evening; and providing a heart of the community.

8.12   In addition there are a series of local centres in Oxford. These centres generally have less opportunity to accommodate significant growth but play an important role in providing for local day-to-day needs. Local centres can offer a supportive role to the larger district centres.

8.13   It is important that new development proposals are appropriate to the role and function of the centre. The hierarchy of these centres is important as it directs developments to areas with best public transport accessibility and co-locates development with other popular uses therefore limiting the need to travel and promoting a sustainable approach. These centres act as a transport hub, where residents, visitors and workers can walk or cycle to and then link up with public transport services as part of an integrated and sustainable approach to travel. The NPPF calls centres 'town centres'. In Oxford these are proposed as:

> **It is important that new development proposals are appropriate to the role and function of the centre.**

Table 3: Centre hierarchy

City centre	Currently defined on the Proposals Map by the city centre Commercial Area
Primary district centre	Cowley Centre as currently defined by the primary district centre boundary
District centres	Cowley Road; Headington; Summertown; Blackbird Leys as currently defined by the district centre boundaries
Local centres	St Clements; Walton St and Little Clarendon St; High St (east); Rose Hill.

8.14   Centre boundaries would be reviewed and defined on the Policies Map. The Local Plan 2001-2016 includes further centres called Neighbourhood Centres. These are not supported as 'town centres' by the NPPF so would not be included in the hierarchy of centres.

Opt 91: Hierarchy of centres for town centre uses

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a hierarchy of centres that defines areas/centres that are suitable for a range of uses that attract a lot of people and to establish the priority locations for retail,	This option fully accords with national guidance (NPPF) which promotes competitive town centre environments and encourages 'town centres' to be placed at the 'heart of their communities' and be supported and delivered through a 'defined network of centres.' This approach promotes sustainable travel by directing major developments to the city centre and district centres,

	which are 'transport hubs' accessible and well served by public transport, cycling and walking facilities.
cultural and tourism development: 1. City centre 2. Primary district centre (Cowley centre) 3. District centres 4. Local centres	This policy approach would apply to a range of uses which the NPPG terms "town centre uses". In addition it accords with national guidance which makes it necessary for Local Plans to 'define a network and hierarchy of retail centres'. This hierarchy would be used for the retail 'sequential approach' and 'impact assessment' to support their vitality and viability.
B) Rejected Option: Expand the hierarchy of centres (Option a) significantly to include centres of employment as well. Employment development that attracts a large number of people should be focused on city and district centres or existing major employment sites.	This option to expand the hierarchy to include centres of employment would not accord with national guidance (NPPF). In some cases these additional centres of employment may be in out-of-centre locations, such as the Oxford Business Park, which is not at present well served by public transport. Furthermore their designation within the hierarchy of centres could potentially attract other uses, such as retail and leisure which may then be competing with 'employment' uses for limited space. The Employment Land Assessment (ELA) makes it clear that there is a shortfall of 'employment land' within Oxford to meet future forecast demand.
C) Rejected Option: Expand the hierarchy of centres (Option a) to include Park and Ride sites.	This option to include Park and Ride sites would not be in conformity with national policy. Whilst they play an important role as 'transport hubs' they are all in out-of-centre locations and in some cases within areas of low lying land/flood plain. So to include them within the hierarchy could potentially attract further major development to these less sustainable areas compared to the hierarchy in Option a.
D) Rejected Option: Do not specify general areas for uses that attract a lot of people.	This option would clearly be contrary to national government policy. It would be in direct conflict with the 'town centre first' policy; and would not promote sustainable development or sustainable travel.

Opt 92: Widening the role of district centres

Policy approach	Consequences of approach/discussion
A) Preferred option: Define specific mix/role policies for each district centre to reflect the local character/function/strengths and any development opportunities. Review the boundaries of the district centres.	The Retail and Leisure Needs Assessment recognised that each district centre had its own distinctive character. Whilst each of these centres is performing well according to key indicators there was an acknowledgement that there are challenges facing these centres, not least from online trading that could threaten their future vitality and viability. This option responds by seeking to build on the strengths of each centre but ensure positive measures are taken to promote economic growth through a greater mix of uses, both commercial and residential and ensure that they continue to provide the focus for the local community. The role of these centres as an important 'transport hub' should be recognised and developed.
B) Rejected Option: Do not include a policy that defines a distinct mix/role for each district centre.	There is no acknowledgement of the distinctive role that each district centre performs and the opportunities that each has. This would not help develop the identities of the district centre and would continue the status quo.

8.15   The sequential approach and impact assessments

The NPPF states that local planning authorities should apply a sequential approach to the location of town centre uses, and a sequential test to planning applications for main town centre uses that are not in an existing centre. It further states that when assessing applications for retail, leisure and office development outside of centres, local planning authorities should require an impact assessment to demonstrate that they will not have a significant adverse impact (cumulatively with other commitments in the area) on any defined centres.

Opt 93: The "sequential approach" and "sequential test": location of town centre uses

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy which sets out the sequential approach based on: centres first, then edge of centres and only out-of-centre locations where no alternative sites are available. Require applicants to demonstrate how they have applied the sequential approach. Include criteria that will be used to assess applications for town centres uses outside of the existing centres. These could include accessibility by public transport; that negative impacts on the road network can be mitigated; and no harm to adjoining land uses.	The NPPF states that authorities should apply a sequential approach to the location of town centre uses. This option would set out the sequential approach that forms part of the strategy of the Local Plan and a policy that would be used to assess and determine planning applications that lie outside the defined 'centres'. This option provides a sequential preference in line with the NPPF by suggesting 'edge-of-centre' sites first and ensures that only out of centre locations are considered when they are considered acceptable in line with the criteria. The NPPF defines 'edge-of-centre' for retail purposes as a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. **(This links with the option on primary and secondary shopping frontages below.)**
B) Alternative Option: Do not include a policy that sets criteria for town centre use proposals outside of centres.	This option relies on national policy to inform decisions on town centre use proposals outside the centres. The NPPF references accessibility and connectivity to the centres as criteria for assessing proposals but no further or locally specific criteria.

Opt 94: "Impact Assessment": threshold for requiring an impact assessment for applications for town centre uses that are not located in existing centres

Policy approach	Consequences of approach/discussion
A) Preferred option: Require new retail developments of 350m^2 gross and above to submit an impact assessment on the city centre and district centres and local centres.	The NPPF states that authorities should require an impact assessment for applications for town centre uses proposed outside of existing centres. This would be used to demonstrate that they will not have a significant adverse impact (cumulatively with other commitments in the area) on any defined centres in Oxford. The default threshold for this requirement is 2,500m^2 however the NPPF allows for a locally set threshold. The Retail and Leisure Study has identified the dynamic growth in smaller convenience stores operated by the major grocers. The main grocers are generally seeking new convenience stores with a minimum floorspace of around 372m^2 (4,000ft^2) gross, which would be missed by the national default threshold but be picked up with a 350m^2 threshold. In addition, modern retailers selling a range of comparison goods have requirements for larger format shop units with a minimum floorspace of circa 465m^2 gross which provides operators with the necessary minimum 'critical mass' of sales needed.
B) Alternative Option: Do not include a policy setting a locally defined threshold for requiring an impact assessment on the centres. Rely on the nationally set 2,500m^2 threshold.	A reliance on the nationally set 2,500m^2 would not capture a significant proportion of proposals for new development that are likely to come forward in Oxford.

8.16   Maintaining the Vibrancy and Vitality of the city centre and district centres

The city centre: Over the past decade there have been many changes in the city centre. George Street and Gloucester Green have developed a leisure and cultural focus with an increase in the number of restaurants catering for the evening economy centred on the cinema and theatres. The traditional and vibrant Gloucester Green market remains popular.

8.17   The city centre's shopping 'heart' is currently centred on Cornmarket St, the Clarendon Centre and Queen Street. The opening of the new Westgate Shopping Centre will result in changes, with occupiers shifting around. New occupiers may come forward and new independent retailers might also emerge. Policy will need to be flexible towards this.

8.18   The High Street remains a popular location for many high-end shops and the Covered Market is a unique asset as it increases the diversity of retail in the city centre. Broad Street is a focus for tourists as it is home to the Visitor Information Centre, specialist markets and acts as a gateway to the prime tourist attractions of the Sheldonian Theatre, Bodleian Library and Radcliffe Camera.

8.19   The Local Plan needs to recognise these changes and build on them to ensure that all areas of the city centre develop an identity, continue to remain vibrant during the day and night time and provide for the shopping and leisure needs of local people and visitors. The NPPF says that Local Plans should identify Primary Shopping Frontages (PSF) and Secondary Shopping Frontages (SSF) on the Policies Map and make clear which uses will be permitted in such locations.

8.20   PSF aim to maintain a high proportion and dominance of A1 (shops) whereas the approach to SSF is more relaxed and allows for a much wider variety of A Class occupiers (shops; professional; food and drink; drinking establishments; hot food takeaways). By categorising the streets as PSF or SSF enables a different level of control over their uses. PSF would protect A1 uses more strongly, SSF would have much more flexibility for other A uses.

8.21   The options below include two different proposals for the city centre PSF and SSF which are set out below and in the accompanying maps.

Opt 95: Primary and Secondary Shopping Frontages of the city centre

Policy approach	Consequences of approach/discussion
A) Preferred option: Identify the Primary and Secondary Shopping Frontages in the city centre. PSF and SSF would remain broadly similar to the frontages in the Local Plan 2001-2016 with the main changes being: • George St would become SSF from PSF • St Ebbe's would become SSF from PSF Within these, adopt a flexible 'hybrid' policy that maintains A1 at 70% in PSF and 80% A Class in SSF across the whole city centre. Allows other uses as exceptions if criteria are met such as: • Development would not have a significant adverse impact on the role and function of the centre • Development would make more efficient use of the upper floors. Allow no other uses other than A1, A3, A4 and A5 in the Covered Market.	This approach adopts the recommended shopping frontages and hybrid policy proposed in the Retail and Leisure Study. The hybrid policy allows more flexibility across the whole of the city centre. It incorporates the recommended percentages of A1 in the PSF and A Classes in the SSF. By including the new Westgate Centre and the Clarendon Centre in the PSF calculations, it will establish a significant proportion of A1 in the PSF meaning that there will naturally be more flexibility within the remainder of the PSF, such as in Cornmarket St where there is a growing interest for food and drink establishments. By classifying George St and Gloucester Green as SSF allows significant flexibility for all A uses with no specific requirement for a proportion of A1. City centre PSF would include: Queen Street; High St (west); Cornmarket St; Broad St; Magdalen St; new Westgate Centre; Clarendon Centre; Market St (part); Golden Cross; City centre SSF would include: George St; Gloucester Green; Gloucester St; St Aldate's (part); St Ebbes St; Bonn Sq; Market St (part at western end); Turl St; St Michael's St (part); Ship St (part); New Inn Hall St (part); Shoe Lane; New Inn Hall St (part). See Map 4 for detailed map.

Support new residential and employment on upper floors. Identify the shopping frontages and resulting Primary Shopping Area on the Policies Map.	The NPPF requires the definition of Primary Shopping Area that generally comprises the primary and secondary shopping frontages. The resultant boundary would be used in assessing proposals in edge of centre locations (see option on the "sequential approach" and "sequential test": location of town centre uses above).
B) Alternative Option: Identify the Primary and Secondary Shopping Frontages in the city centre. PSF and SSF would alter significantly from the Local Plan 2001-2016 as follows: • Queen Street and the High Street (from Carfax to the Covered Market) would remain as the only PSF • All other shopping frontages would be SSF • Exclude the new Westgate centre, Clarendon Centre and Covered Market from shopping frontages Within these, adopt a flexible 'hybrid' policy that maintains A1 at 70% in PSF and 80% A Class in SSF across the whole city centre. Allows other uses as exceptions if criteria are met such as: • Development would not have a significant adverse impact on the role and function of the centre • Development would make more efficient use of the upper floors. Support new residential and employment on upper floors. Identify the shopping frontages and resulting Primary Shopping Area on the Policies Map.	This approach does not adopt the recommended shopping frontages in the Retail and Leisure Study. It adopts the Study's hybrid policy which allows more flexibility across the whole of the city centre. It incorporates the recommended percentages of A1 in the PSF and A Classes in the SSF. By only classifying Queen St and the western end of the High St as PSF would grant significant flexibility for units within the SSF to change to any A Class use. This might provide more opportunities for the SSF to adapt to changes in the retail sector. Only Queen St and High Street would be afforded specific protection for A1. The new Westgate Centre, Clarendon Centre and Covered Market would be excluded from the shopping frontages and left to manage themselves within the context of their bespoke management arrangements. City centre PSF would include: Queen Street; High St (west); City centre SSF would include: Cornmarket St; Broad St; Magdalen St; Market St (part); Golden Cross; George St; Gloucester Green; Gloucester St; St Aldate's (part); St Ebbes St; Bonn Sq; Market St (part at western end); Turl St; St Michael's St (part); Ship St (part); New Inn Hall St (part); Shoe Lane; New Inn Hall St (part). See Map 4 for detailed map.
C) Rejected Option: Do not include a policy to identify Primary and Secondary Shopping Frontages and do not place any restrictions on shop frontage but rely on the market and Permitted Development and Prior Approval process (gaining approval for a change of use without requiring planning permission).	This approach would be contrary to the NPPF which requires Local Plans to set policies that identify PSF and SSF and make clear which uses will be permitted in them. For the purposes of assessing Prior Approval applications an indication would still be required of the proportion of A1 uses expected in the PSF to ensure that A1 loss would not impact upon shopping provision. It would likely result in the erosion of key shopping streets to other non-A1 (shop) uses.

Map 4: Preferred Option primary and secondary retail frontages and primary shopping area in the city centre

Legend:
- Covered market
- Primary
- Secondary
- City and district centres
- Primary shopping area

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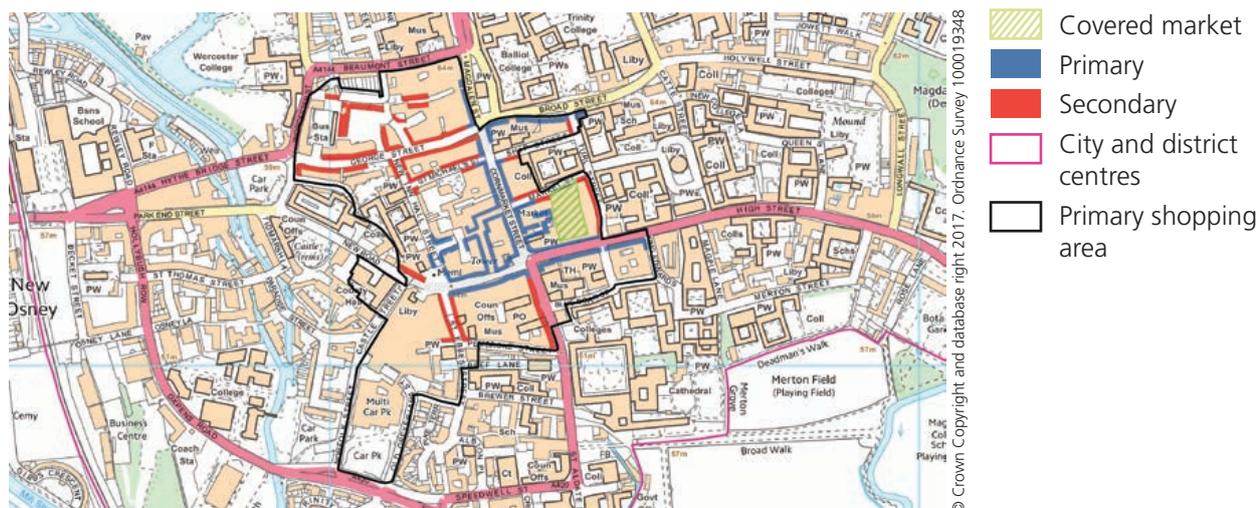
8.22 **District and local centres:** Each of the district centres has a distinctive character and has strengths and opportunities on which to build. The Retail and Leisure Study has looked at each in detail as well as seeking feedback from household surveys and has made recommendations for how the Local Plan could help shape these centres. The NPPF looks to promote and strengthen 'town centres', which district centre are classed as, and says Local Plans should identify Primary Shopping Frontages (PSF) and Secondary Shopping Frontages (SSF) on the Policies Map and make clear which uses will be permitted in such locations.

8.23 Local centres include a range of shops and some services of a local nature serving a small catchment area.

Opt 96: Primary and Secondary Shopping Frontages of district and local centres

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy identifying the Primary and Secondary Shopping Frontages for the district centres. Within each district and local centre, adopt a flexible 'hybrid' policy that maintains a proportion of A1 in PSF and A Class in SSF across each District and local centre. Allows other uses as exceptions if criteria are met such as (criteria could vary depending on the district centre): • Development would not have a significant adverse impact on the role and function of the centre • Development would make more efficient use of the upper floors. Support new residential and employment on upper floors. Local centres would include St. Clements, Walton Street and Little Clarendon Street, High Street (east) and Rosehill.	Derived from the Retail and Leisure Needs Study, exceptions and Shopping Frontage requirements would be developed along these lines: **Cowley Centre (primary district centre):** Providing the range of retail units and type of environment that will attract high quality operators; additional quality cafés, restaurants and bars; improving the pedestrian connections between the shopping centre and retail park. PSF should aim to maintain 70% of A1 Uses; SSF should aim to maintain 60% of Class A Uses. **Blackbird Leys:** Improvement and investment including the surrounding services and facilities to bring forward a modern centre that is fit for purpose. PSF should aim to maintain 50% of A1 Uses; SSF should aim to maintain 85% of Class A Uses. **Cowley Road:** Consolidation of a retail core and a clearer definition of the primary shopping area; acknowledge the current restaurant and leisure provision. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses. **Headington:** Improve the quality of the centre's comparison goods offer; develop restaurant cultural and leisure opportunities. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses. **Summertown:** build on its independent offer by enhancing the variety and choice of retailers; consider potential development sites. PSF should aim to maintain 60% of A1 Uses; SSF should aim to maintain 90% of Class A Uses

PSF and SSF boundaries to be based on the recommendation in the Retail and Leisure Study.	**Local centres:** PSF should aim to maintain 50% of A1 Uses; SSF should aim to maintain 85% of Class A Uses. It would make more efficient use of land by encouraging residential and employment on upper floors. The NPPF requires the definition of Primary Shopping Area that generally comprises the primary and secondary shopping frontages. The resultant boundary would be used in assessing proposals in edge of centre locations (see option on the "sequential approach" and "sequential test": location of town centre uses above).
B) Rejected Option: Do not include a policy to identify Primary and Secondary Shopping Frontages and do not place any restrictions on shop frontage but rely the market and Permitted Development and Prior Approval (gaining approval for a change of use without requiring planning permission).	This approach would be contrary to the NPPF which requires Local Plans to set policies that identify PSF and SSF and make clear which uses will be permitted in them. For the purposes of assessing Prior Approval applications an indication would still be required of the proportion of A1 uses expected in the PSF to ensure that A1 loss would not impact upon shopping provision. It would likely result in the erosion of key shopping streets to other non-A1 (shop) uses.

Map 5: Cowley Centre

Covered market
Primary
Secondary
City and district centres
Primary shopping area
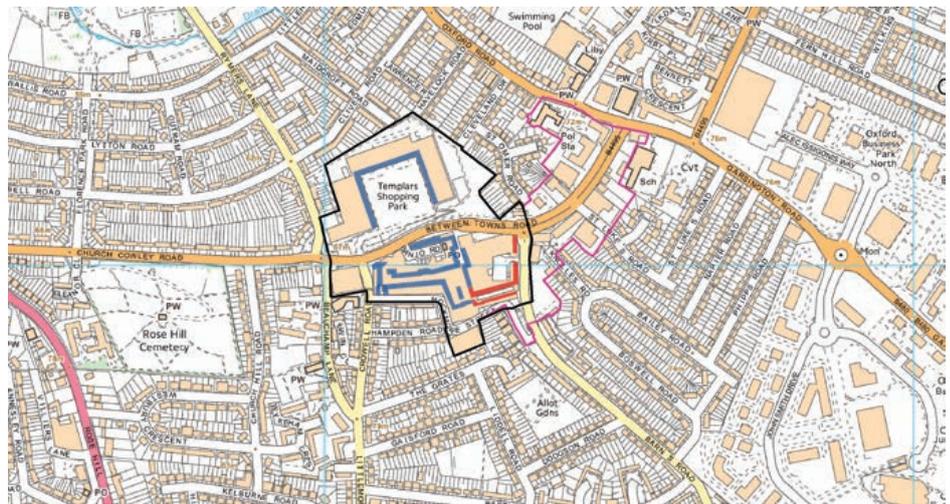
Map 6: Cowley Road
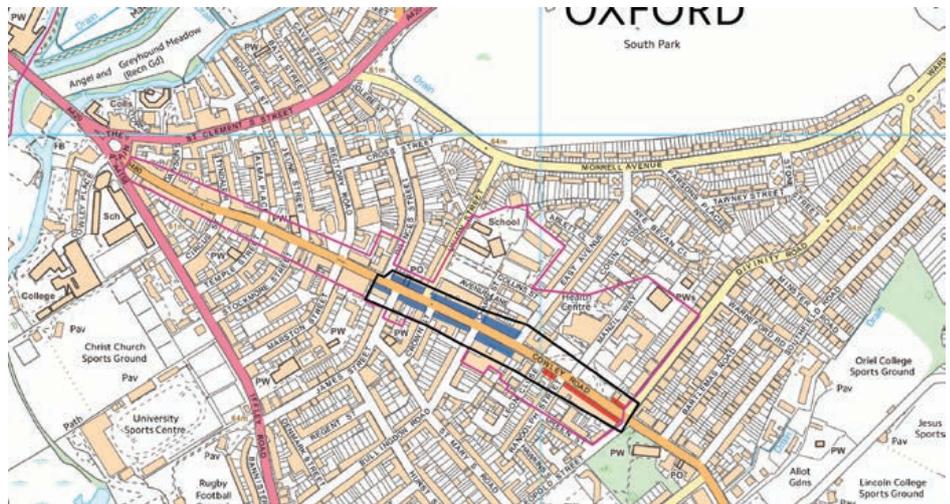
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Map 7: Headington
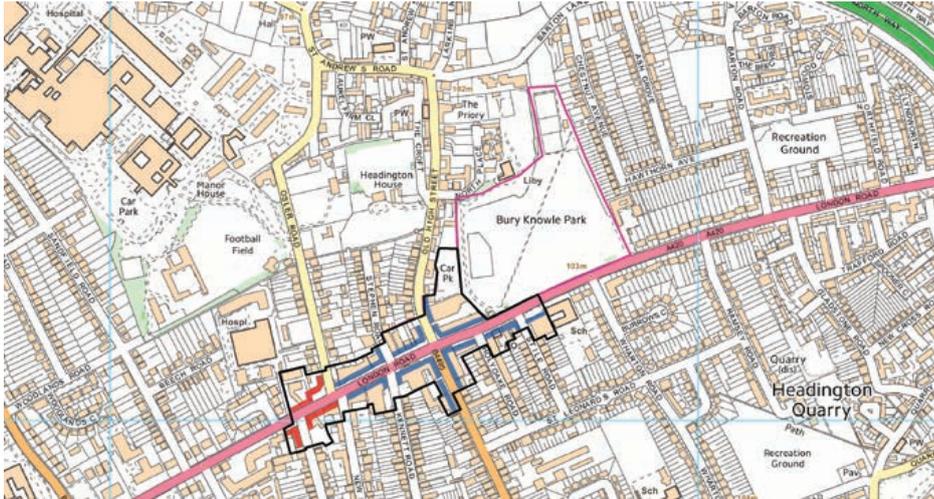
▨	Covered market
▮	Primary
▮	Secondary
▭	City and district centres
▭	Primary shopping area

Map 8: Summertown
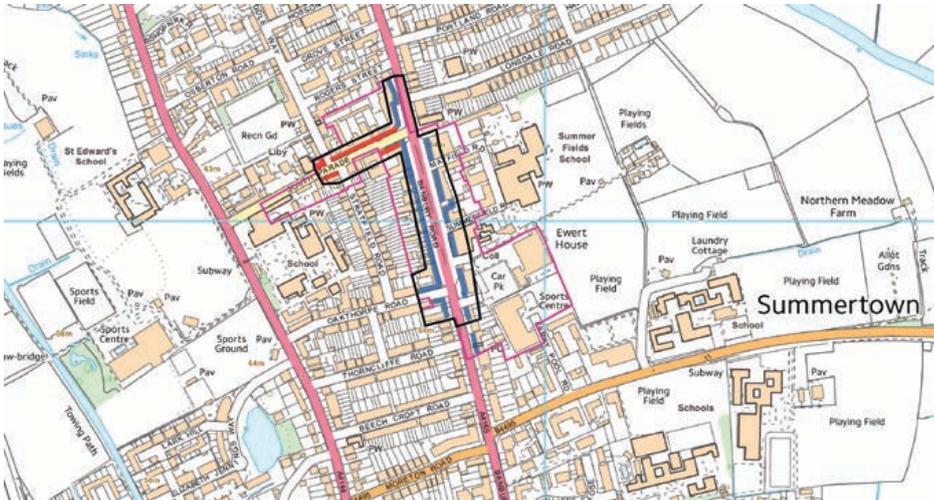
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8.24 Evening, cultural and social activities

Oxford has a rich infrastructure of cultural and social activities and venues, from theatres, museums, cinemas, galleries, sports and music venues to restaurants and pubs. These uses can help to keep a centre vibrant and active and add greatly to the local quality of life.

Opt 97: Evening economy: cultural and social activities

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a criteria based policy which protects existing venues, and provides a more detailed policy approach to determining new proposals (e.g. locational, clustering, and neighbourliness issues).	There is a national trend of music and other social venues closing in large part due to other non-cultural uses commanding higher land values. This approach would help guard against the unnecessary loss of valued social, recreational and cultural facilities and services. It would help ensure that such facilities are able to develop and modernise and are retained for the benefit of the community. It is important that evening economy uses can flourish and co-exist with other uses especially where they are found in close proximity to one another. A specific policy could vary across the centres in response to local character, to ensure that the appropriate approach is taken to locational and neighbourliness issues.
B) Alternative Option: Do not include a policy on the evening economy but rely on other policies relating to the city and district centres.	Leisure, entertainment, cinemas, restaurants, night-clubs, bars and arts and cultural uses (among others) all fall within the NPPF definition of "main town centre uses". This means that they are generally appropriate in town centres (in Oxford these are the city and district centres) and are subject to the "sequential approach" and "hierarchy of centres" described above.

Ensuring Oxford is a vibrant and enjoyable city to visit

National Planning Policy says:

8.25   The NPPF refers to tourism in relation to its acceptability as a town centre use in order to promote the vibrancy and competitiveness of these areas. The PPG notes that tourism is extremely diverse and covers all activities of visitors. It states that local planning authorities, where appropriate, should articulate a vision for tourism in the Local Plan, including identifying optimal locations for tourism.

8.26   The government's Tourism Action Plan (2016) supplements the industrial strategy and focuses on making the sector more internationally competitive and resilient and ensuring that the benefits of growth in the sector are felt widely. Aspects of the action plan particularly relevant to the Local Plan are improving skills in the sector and the quality of the public transport offer.

The Oxford story – background evidence and the Sustainability Appraisal:

8.27   Oxford has an increasing number of visitors and overnight stays and remains a crucial destination of the national tourism industry. However, Oxford has a very large number of tourists making very short visits, often only for part of, or one day. The economic benefits to the city of these short visits are slight, while the impact of these visits is significant. For example many of these short-visit tourists arrive on coaches for the day; these add to the pressures on the highway network, add to congestion and require land for parking. These transport impacts are addressed in Section 7 on Transport. Policies which facilitate increased overnight stays will result in greater spend in Oxford's shops and restaurants which will in turn boost their viability and Oxford's economy.

8.28   The SA highlighted how policies which support Oxford's tourist industry will have positive impacts on various SA objectives, especially in promoting sustainable tourism and a vibrant economy. However, the SA highlights potential conflicts between the enhancement of Oxford's attractiveness for visitor and the strain on the existing transport infrastructure and the potential damage to Oxford's communities if their needs are not supported alongside a growth in tourism.

Responses to first steps consultation:

8.29   Some respondents commented that they disliked the high levels of tourism Oxford attracts, that there were too many large groups of tourists and that Oxford needs quality businesses which caters to the needs of local residents rather than tourists. While the income from tourism is an important part of the city's economy, this is an indication that Oxford requires a better management of its tourists and, in particular, balancing the needs of visitors with the needs of residents.

Potential policy responses:

8.30   Visitor facilities
        In addition to tourists the short-stay accommodation market is very strong for business travellers in the city and provision of more accommodation would additionally help support the economy objectives of the Local Plan. The hotel background paper highlights that when Oxford's hotel occupancy and room rates are compared with those of comparable cities,

> **Oxford has an increasing number of visitors and overnight stays and remains a crucial destination of the national tourism industry.**

there is unmet demand and potential for growth in all varieties of short-stay accommodation. Oxford is an internationally significant tourist destination and needs robust tourism policies which both encourage longer-stay tourism and mitigate the negative effects of tourism (especially those of short visit tourism) on its residents and businesses. Policies will need to be clear in the stance taken in balancing these considerations.

8.31   Increasingly, short-term lets of domestic properties are being marketed as holiday lets and for those who work in Oxford during the week, through websites such as AirBnB and Tripadvisor. In 2016 524 properties were found to be available for short lets in Oxford on the AirBnB website. 300 of these were whole house lets. The way that properties are being let means that no planning application to change use from a domestic property is required. Currently few regulations apply and business rates are rarely applicable. The location of this type of accommodation also cannot be controlled. Consideration will be given to implementation of any legislation introduced that provides the ability to better control these uses.

Opt 98: Tourist/Visitor attractions

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a policy permitting new tourist attractions only where they will not increase road congestion, i.e. in locations easily accessible by public transport, and particularly the city and district centres, where they can be served by existing facilities, or through improvements to public realm or facilities.	This offers great benefits to all SA objectives it affects but most notably it has potential for reduced congestion and economic benefits as this option also lends itself to enhancing the vitality of the centres. It would be important not create attractions which conflict with the historic city centre and undermine Oxford's character.
B) Alternative Option: Have a policy that does not permit new tourist attractions.	This option would limit the impact of tourism on Oxford's transport system and communities and could also help maintain the historic character of the city centre by limiting new developments . However, this will not contribute to the understanding and appreciation of Oxford's unique history nor make it more accessible. More damaging to Oxford would be, however, the damage to its tourism industry and thereby its economy.
C) Alternative Option: Do not include a policy on tourist attractions.	Would be reliant on other policies to control the negative effects of potential developments.
D) Rejected Option: Include a policy that is generally permissive of tourist attractions.	This would not limit development of new attractions to. This may help to support restoration projects and finance upkeep of historic buildings which could help to protect the historic character of the city centre; however, the potential implications on transport are severe. This option allows the possibility of locating attractions far from existing transport hubs which could generate more congestion.

Opt 99: Short-stay accommodation (hotels and guest houses)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Include a policy which seeks to prevent the loss of existing short-stay accommodation to other uses.	Given the importance of tourism to Oxford and the demand for hotel bed spaces, identified in the hotel background paper, it is important to seek to prevent the loss of existing visitor accommodation to other uses. Inclusion of criteria which must be met before a loss will be permitted (such as viability, marketing etc.) would ensure that existing sites that function poorly are not prevented from being redeveloped.
B) Preferred option (Combination of A + B)**:** Include a policy to permit new purpose-built short-stay accommodation in the city centre, district centres and on Oxford's main arterial roads.	This approach would encourage the provision of accommodation, which would contribute to Oxford's long-term goal of encouraging a higher percentage of visitors to stay overnight in Oxford and benefit the economy. Allowing short stay accommodation in the centres will also enhance the vibrancy of these areas; and the NPPF deems this an acceptable use for such areas. The pressure on the

	centres to accommodate a wide range of uses could be alleviated by allowing short-stay accommodation additionally along arterial routes. This option could also apply to extension of existing premises in these locations. Potential risks to this approach could include an increase in traffic along arterial roads, or risk this use becoming dominant; the policy would need to consider how these risks could be mitigated.
C) Alternative Option: Allow new short-stay accommodation in the city centre and at district centres.	This approach will enhance the vibrancy of the city and district centres as supported by the NPPF. However only allowing short-stay accommodation in such a limited number of locations could result in this use squeezing other uses, resulting in a loss of variety which is so important in these centres. This option could also apply to extension of existing premises in these locations.
D) Alternative Option: Allow new short-stay accommodation across the city.	This will offer the potential for many more sites to be deemed appropriate for development for short-stay accommodation. It could potentially greatly encourage overnight stays in Oxford and add to Oxford's economy. This option could also apply to extension of existing premises. However, allowing these facilities across Oxford could result in sites coming forward that are poorly located in terms of adding to congestion or impacting on residential amenity for example.
E) Rejected Option: Include a policy to prevent new short-stay accommodation.	It is quite likely that this would in practice reinforce the current situation with more tourists opting to visit for the day only and limited if any effect on overall numbers. This option would enable more sites to be developed for other priorities, however it would hamper Oxford's long term, tourist objective of encouraging more overnight stays and increased visitor spends in Oxford. This could harm Oxford's economy.
F) Rejected Option: Include a policy which allows the loss of short-stay accommodation to other uses.	Given the range of other priority uses in the city it may be beneficial to consider alternative uses for existing short-stay accommodation. Short-stay accommodation sites are generally located in either city centre type locations, which could be redeveloped (for retail, office or residential uses for example) or residential areas and so could be converted or redeveloped to provide more homes. This option would however severely hamper Oxford's long term, tourist objective of encouraging more overnight visitation and increased visitor spends in Oxford.
G) Rejected Option: Do not include a policy on short-stay accommodation.	This approach fails to recognise the importance of the tourism sector and creates great uncertainty. It fails to promote Oxford's objective of encouraging overnight visitation. This means Oxford is reliant on market influences alone to provide adequate accommodation and the lack of direction also means any new facilities could be poorly located to serve their purpose.

Providing communities with facilities and services

National Planning Policy says:

8.32   The NPPF states that the planning system should seek to support: *"strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"* (paragraph 7). It says that local authorities should plan positively for the provision and use of community facilities and other local services, guarding against loss of valued facilities and ensuring an integrated approach to considering the location of housing, economic uses and community facilities and services.

8.33   The NPPF states "Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including

heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demand" (paragraph 162). It also states that "it is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion (paragraph 177)

8.34   The PPG contains more details on the operation the Community Infrastructure Levy and the links with other forms of planning obligation.

The Oxford story – background evidence and the Sustainability Appraisal:

8.35   The Oxfordshire Clinical Commissioning Group is responsible for buying health services for those who live in Oxfordshire. All GP practices are members of OCCG, and the CCG's priorities are informed by the health professionals who work at these surgeries. Current priorities in the Oxfordshire CCG Strategy for 2014/15-2018/19 include delivering fully integrated care, close to home, for the frail elderly and people with multiple physical/mental health needs and continuing to provide preventative care and to tackle health inequalities for patients and carers.

8.36   The Oxfordshire Healthcare Transformation Programme is working towards development of plans for the next generation of integrated GP, community and hospital services. This is part of the Buckinghamshire, Oxfordshire and Berkshire Sustainability and Transformation Plan.

8.37   The programme's aims are to:
• Provide innovative ways of delivering outcomes for a society that lives longer and expects more
• Maximise the value of Oxfordshire's health and social care spend
• Find ways to become better at preventing and managing demand
• Help people to take greater responsibility for their own health and prevent avoidable disease

8.38   The Board behind the programme is made up of the Oxfordshire Clinical Commissioning Group, Oxford Health NHS Foundation trust, Oxford University Hospitals NHS Trust, South Central Ambulance NHS Foundation Trust, the Oxfordshire GP Federations and Oxfordshire County Council. The Local Plan will need to reflect the programme and outcomes of this work.

8.39   The SA indicates that policies which seek to provide communities with facilities and services will have positive impacts on wide range of SA objectives, especially in promoting vibrant communities, poverty, social exclusion and inequality and essential services and facilities, but also human health and education. The SA does not identify any negative impacts from these policy approaches on the SA objectives.

Responses to first steps consultation:

8.40   At the First Steps consultation there was concern about the pressure that new employment and housing development might place on infrastructure. There was a view that current infrastructure could not support growth and that new or improved infrastructure needs to be in place to facilitate the growth. Comments were made that any new areas of housing need access to community facilities and new infrastructure and that family accommodation should be near schools and that GP provision needs improvement. Many people felt that it was important for developers to contribute to the provision of infrastructure. It was suggested that the focus should be on improving facilities in the most deprived areas.

At the First Steps consultation there was concern about the pressure that new employment and housing development might place on infrastructure.

Potential policy responses:

8.41   Provision of infrastructure and facilities to support new development
        It is important that new development in Oxford is supported by sufficient infrastructure. The options below consider funding of the infrastructure and also some key facilities that will be needed to support new development. Some facilities, such as sports facilities, community facilities and schools, have been considered elsewhere in the *Preferred Options Document*.

8.42   It is intended that the Local Plan makes provision for the integration of any potential future sustainable urban extensions to the city. It may be that, as a result of the work of the Oxfordshire Growth Board and neighbouring Local Plans, housing is proposed on the edge of Oxford. It will be important therefore to ensure that connections and links, and access to infrastructure and facilities within the city are available to residents of the new homes.

8.43   The City Council will look at funding infrastructure across Oxford through a range of mechanisms including Growth Funds and the Local Enterprise Partnership.

Opt 100: Infrastructure and developer contributions

Policy approach	Consequences of approach/discussion
A) Preferred option: Include a policy that sets out the approach to developer contributions (e.g. Community Infrastructure Levy and Section 106).	A policy will help to provide clarity and certainty about what is expected in Oxford. However the mechanism for requiring contributions from developers to pay for infrastructure needs is unlikely to remain the same during the Plan period. There is a risk that any policy will become superseded by changes to the regulatory framework. Any such policy will need to be carefully framed.
B) Alternative Option: Do not include a policy on Infrastructure and developer contributions.	The mechanisms for infrastructure and developer contributions are set out clearly in Government guidance. The City Council intends to update its CIL charging schedule. This means that specific policy wording may be unnecessary. However, to make a clear link between further guidance and the Local Plan, a policy may be required.

8.44   Utilities
        Smart Oxford is a strategic programme of a wide range of city partners working together to develop and promote Oxford as a smart city. The aim of Smart Oxford is to build a stronger, safer, economically and environmentally sustainable city, to help its people to identify and be part of city solutions, to provide a test bed for world class researchers and innovators, to generate growth and jobs, to advance economic & social prosperity, and to help improve the quality, effectiveness and efficiency of city services[5]. The Council will seek to ensure that all new development and wherever possible all residents and business have ubiquitous access to superfast speeds of internet connectivity.

[5] www.oxfordsmartcity.uk

Opt 101: Delivering High Quality Ubiquitous Digital Infrastructure

Policy approach	Consequences of approach/discussion
A) Preferred option: Require all developers of employment floorspace over a certain threshold to include the necessary infrastructure to ensure that future business occupants can benefit from high quality digital facilities. Include a policy which is supportive of the expansion of high quality ubiquitous digital communications.	This will promote economic growth for businesses and encourage new businesses to Oxford. Improvements in the digital infrastructure should improve communications and remote working opportunities therefore reduce the need for car journeys.

B) Rejected Option: Do not include a policy on digital infrastructure provision.	Not having a policy would not deliver Smart City objectives

Opt 102: Waste water and sewerage infrastructure

Policy approach	Consequences of approach/discussion
A) Preferred option: Do not include a policy on water and sewerage infrastructure.	Thames Water comment on individual planning applications and can object if an area does not have sufficient water and waste water infrastructure capacity. If this occurs, the City Council would add a condition to a planning permission requiring that the infrastructure is provided which would be undertaken through other legislative requirements. When planning strategically, as through this Local Plan process, Thames Water would be consulted on proposed sites for development to ascertain infrastructure capacity. Any issues identified at these early stages would aim to be resolved through the Plan making process. The absence of a policy would not cause infrastructure issues because other legislative frameworks exist to address this.
B) Rejected Option: Include a policy that would permit development only where sufficient capacity exists or where extra capacity can be provided.	As explained above, other legislative requirement exist to ensure that development has adequate water and waste water capacity. A restrictive policy would conflict with the existing legislative process.

8.45 Access to education (state primary and secondary schools), primary healthcare and community facilities
The provision of sufficient school places is the responsibility of Oxfordshire County Council as the Local Education Authority. The Local Plan's role is to ensure growth is supported by necessary infrastructure including education and it can protect sites and encourage intensification to increase school place capacity. Meeting school places has wider sustainability effects than simply education, it is also about reducing inequalities across Oxford, and schools are increasingly performing multi-functions in terms of being a wider community hub incorporating other social benefits such as access to sports facilities, community facilities or health services, as exemplified at Barton Park new community hub which incorporates the primary school.

8.46 Community facilities can include community centres, children's centres, meeting venues for the public or voluntary organisations, public halls and places of worship, leisure centres, pavilions, stadiums, public houses, club premises or arts buildings that serve a local community. Other types of buildings might also be classed as, and function as, community facilities.

8.47 These are important in meeting social, leisure, cultural and religious needs and help develop social inclusion and a high quality of life. Sometimes facilities might not be fit-for-purpose or provide poor accessibility where improvements on site or nearby might be more sustainable. Co-locating multiple facilities on a single site can be an efficient way to improve accessibility and quality.

8.48 Due to the changing nature of socialising habits a number of traditional pubs have struggled and closed. There are often other land uses which are more valuable or profitable. However the traditional pub has an important social function for the community they serve. It can provide a local meeting place, venue for entertainment and a focus for social gatherings. Pubs are often an integral part of an area's evening and night time culture and economy.

Opt 103: Access to education (state primary and secondary schools)

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Protect existing state primary and secondary school sites and support extensions and more intensive uses on site.	This approach supports efficient use of land through intensification and modernisation. Provision on existing sites means that schools are not competing with housing or employment use elsewhere. It ensures adequate school places for local children. It may result in increased traffic/congestion on existing school routes and any additional pressures will need to be mitigated, but it could also offer potential to provide improvements to sustainable modes of travel.
B) Preferred option (Combination of A + B)**:** Indicate through the site allocations which sites would be suitable for a school use and identify a site for a new school if considered necessary. Introduce criteria for assessing the suitability of unallocated sites that might be proposed for schools, which will include issues such as access, accessibility, size of site and neighbouring uses.	The Local Plan can identify sites that might be suitable for a school where there is an identified need in the local area. This would need to be supported by the County Council or it would not be deliverable.
C) Alternative Option: Do not allocate sites for schools but set out criteria against which school proposals will be judged.	An approach that uses a criteria based policy with no site allocations would help with making planning decisions but without being prescriptive on location, This option would mean that opportunities may be missed to help deliver school sites (which can be challenging) and that there would be less certainty that locations will be proximate to demand/need.

Opt 104: Primary healthcare services

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + B)**:** Have a policy approach that is generally permissive of new primary healthcare facilities if certain criteria are met, for example that they are in accessible locations.	Primary health care facilities will not be suitable in all locations, so it is sensible to include criteria so that proposals can be assessed. However, adequate provision of health care facilities is important for residents' quality of life, so new facilities should be generally supported by the Plan. Facilities shared with other providers are likely to be particularly suitable given the constrained nature of Oxford.
B) Preferred option (Combination of A + B)**:** Identify specific areas or development sites that will need to provide primary healthcare facilities.	Substantial population growth is expected in the city over the Local Plan period and new homes will be delivered placing increasing pressure on primary healthcare services. Where there are large new developments occurring or where primary healthcare facilities are closing there will be added pressure. The Plan could identify development sites where a new GP surgery would be supported.
C) Rejected Option: Do not include a policy on new primary health care facilities.	This would mean that no expectation of delivery of new facilities would be included in the Plan, and there would also be no criteria set out to aid assessment of any proposals for new facilities. As there is a need for new facilities which will not necessarily be suitable in all locations, it is sensible to include a policy relating to primary health care facilities.

Opt 105: Community facilities

Policy approach	Consequences of approach/discussion
A) Preferred option (Combination of A + C)**:** Have a criteria based policy to protect community facilities, allowing loss under only certain exceptional circumstances, such as replacement nearby, or significant improvement to nearby facilities, or demonstration they are surplus to requirements and that	Because circumstances change it is sensible to have a certain amount of flexibility in the policy approach, rather than a blanket protection. This approach will enable greater flexibility in the way community facilities are provided, to reflect population growth and changing needs. In a city with limited space, this should help to ensure the best possible provision overall.

opportunities have been explored for multi-use or other community uses.	
B) Alternative Option: Include a blanket protection of all community facilities.	This approach is not flexible enough to the changing needs of Oxford's neighbourhoods. These facilities are valued and very important. However, re-provision may have the potential to provide a facility better suited to modern needs. Not all facilities are in the best locations, well-used or suitable for a flexible and wide range of uses.
C) Preferred option (Combination of A + C)**:** Require a community use agreement for all new community facilities.	This would apply to community facilities that are not public facilities. This will maximise the accessibility of facilities to local communities.
D) Rejected Option: Do not include a policy on community facilities.	This will mean that the Local Plan will not set out an expectation that community facilities will be retained, or set out criteria that allow a judgement to be made about the suitability of alternative provision.

Opt 106: Pubs

Policy approach	Consequences of approach/discussion
A) Preferred option: Have a policy to protect pubs, using a criteria based approach. This would include evidence of diversification to establish a wider customer base; lack of viability; with marketing a key component. There should also be demonstration of a lack of need for a pub, for example because of the availability of other pubs in the area and an assessment of the community value of the pub and the importance of its design, character and heritage to the wider streetscape and local area.	This option offers a balanced approach to the protection of pubs considering firstly whether the owners have sought to diversify to widen the customer base (e.g. restaurant focus, community hub, visitor accommodation). Secondly whether these is a viability argument, including appropriate marketing having been undertaken. Thirdly, whether there are other pubs within a defined area that would still serve the catchment area. Fourthly the importance of the pub as a community facility in the area. It would also be useful to consider the economic role of the public house, how it functions in serving the local community or wider city-wide role.
B) Alternative Option: Have a policy to protect pubs relying on marketing evidence only.	This option weakens the protection that could be afforded to public houses, since whilst viability is a very strong criteria that does need to be satisfied equally consideration should be whether there are any other public houses in the area. This second factor recognises the role that pubs play in sustaining vibrant communities.
C) Alternative Option: Do not include a policy to protect pubs but rely on a general protection of community facilities policy.	This option would offer less protection and given the high land values of properties in Oxford would inevitably result in the loss of a significant number of public houses.

9. Sites

9.1   A site allocation is a planning policy that describes what type of land use, or mix of uses, would be acceptable on a specific site or whether the site is protected for certain types of development. The purpose of the site allocations is to allocate sites for built development or to maintain a type of built development on a site. Site allocations are important because they give guidance and certainty to developers and landowners and they help local people understand what may happen in their neighbourhood in the future. They are a positive policy towards redevelopment of the site and help ensure the right type of development happens in order to meet the Strategy of this Local Plan and the *National Planning Policy Framework*.

9.2   Similar current site allocations can be seen in the Sites and Housing Plan Part B. Some of these have become out of date or have been built so we now need to review them. They will be superseded once the Local Plan 2036 is adopted. We also need to determine which new sites should be allocated for development to meet the needs of Oxford whilst also protecting sites that are important facilities for residents and enable businesses to thrive in Oxford.

9.3   Oxford City Council has three Area Action Plans in place covering the West End, Barton and Northern Gateway. These contain detailed policies for future development of those areas.

Opt 107: Area Action Plans

Policy approach	Consequences of approach/discussion
A) Preferred option: Continue to use the existing Area Action Plans as the basis for decisions on appropriate uses in those areas, rather than including detailed new site allocation policies.	The Area Action Plans have considered these areas in detail and already contain policies to guide decision making. There is no clear need for the Local Plan to include new detailed policy allocations for these areas, other than to include a new policy to link to the Area Action Plans. In this approach, the adopted AAPs would remain part of the planning policy framework for the city and would be used in determining planning applications in those areas.
B) Alternative Option: Include new site allocation policies for the Area Action Plan areas and any individual sites within them.	This approach would affect the West End in particular, as it is a large area of the city centre that is brownfield land, and where a large number of sites could potentially come forward individually. The West End Area Action Plan looked at the balance of uses necessary across the area, rather than individual site allocations, which seems more appropriate for a large brownfield area of the city centre than a series of individual site allocations within the Local Plan. In this approach, the AAPs would be superseded by the new policies of the Local Plan.

Compiling the initial list of sites

9.4   The full list of 516 sites was compiled from a wide range of sources. The City Council has taken an approach of 'leaving no stone unturned' to find sites suitable for development to meet the needs of Oxford.

9.5   Potential sites were identified from the following sources:
   i.   Core Strategy allocated sites
   ii.   Sites and Housing allocated sites
   iii. West End AAP identified sites
   iv.   Other sites from the previous 2014 Strategic Housing Land Availability Assessment

Oxford
Local Plan 2036

v. Calls for sites inviting landowners to nominate their sites (2014, 2016, Local Plan)

vi. Protected Key Employment Sites

vii. Other employment sites not protected (if greater than 0.25ha)

viii. Wildlife Corridor and Sites of Local Importance for Nature Conservation (SLINC) designations

ix. Protected Open Space designations (public open space, open air sports, allotments)

x. Sites previously rejected through the Sites and Housing Plan process

xi. Stakeholder consultation (Unlocking Oxford's Development Potential [Cundell] Report)

xii. City Council department suggestions (Property/Leisure)

xiii. Commitments (sites with planning permission or Prior Approval for housing, student accommodation)

xiv. Sites refused planning permission or expired but suitable for housing/ student accommodation in principle

xv. Map survey (any other piece of land greater than 0.25ha)

Assessing the list of sites

9.6 A three stage process was followed to identify which of these potential sites should be included as proposed site allocation policies in the Local Plan. The three stages can be summarised as follows:

Stage 1 Assessment: Exclude those sites with clear conflicts with national policy and/or insurmountable environmental or physical constraints

Stage 2 Assessment: Assessment against the *Sustainability Appraisal* objectives

Stage 3 Assessment: Assessment against the Local Plan Preferred Options strategy and deliverability considerations

9.7 Stage 1 Assessment
All sites underwent a Stage 1 filter process; sites were rejected for allocation for development at Stage 1 only if they were:

i. a Special Area of Conservation (SAC) or Site of Special Scientific Interest;

ii. greenfield in flood zone 3b;

iii. less than 0.25 hectares in area;

iv. already at an advanced stage in the planning process (i.e. development has commenced).

9.8 Stage 2 Assessment
All sites that had passed the Stage 1 filter process were considered against the *Sustainability Appraisal* objectives. The physical criteria were assessed in terms of accessibility, flood risk, topography, contamination, air quality, neighbouring land uses, distance to primary school and GP surgery and location in deprived area. The environmental criteria were assessed in terms of land type, townscape/landscape character, heritage assets, biological/geological importance and green infrastructure. Sites were scored accordingly, however sites were only rejected for allocation for development at Stage 2 if they:

i. were considered to be part of Oxford's Green Infrastructure network as determined in the Green Infrastructure Study;

ii. had no clear access.

A three stage process was followed to identify which of these potential sites should be included as proposed site allocation policies in the Local Plan.

9.9 **Stage 3 Assessment**
All sites that had passed the Stage 2 assessment were considered in terms of deliverability and against the Local Plan Preferred Options strategy. Sites were rejected for allocation for development at Stage 3 only if:

i. it is extremely unlikely to become available during the plan period (i.e. before 2036);

ii. the landowner has indicated that they have no intention to develop;

iii. there is serious conflict with the NPPF/Oxford Local Plan Preferred Options strategy and no mitigation is possible

9.10 In total, 390 sites were rejected at stage 1, 2 or 3. The remaining 126 were then considered for a preferred option (in terms of use or protection) using the strategy of the *Preferred Options Document*.

How the site allocations will deliver the strategy

9.11 The earlier sections of the *Preferred Options Document* set out the strategy for this Local Plan. Many of the Preferred Options have spatial implications, which mean that they will direct certain types of development to certain locations, will favour certain types of development over others, and will protect certain types of existing uses. The site allocations therefore help to deliver the strategy of the Local Plan 2013.

9.12 The Local Plan Preferred Options strategy would lead to the following spatial approaches.

9.13 Allocating new built development and protecting certain built development (through Site Allocations):

i. **Allocating as many sites as possible for housing** where deliverable

ii. **Protecting existing housing** only allowing redevelopment in exceptional circumstances

iii. **Allowing new purpose built HMOs** in appropriate locations

iv. Allowing new student accommodation only on allocated sites, existing campuses, in district centres and the city centre

v. **Supporting older persons accommodation**

vi. **Allocating Green Belt sites for housing** (if suitable in other respects) and other important infrastructure that are rated as having a 'moderate' and 'low' (but not 'high') impact on the function of the Green Belt

vii. **Protecting employment uses** that are important to the knowledge economy or are important nationally and regionally (described as Category 1 sites in the Preferred Options)

viii. **Allowing the loss of B8 sites** to other B1, B2 and Sui Generis that support the local economy

ix. **Ensuring that uses that attract a lot of people follow the hierarchy of centres:** City centre; primary district centre (Cowley centre); district centres; local centres

x. **Ensuring that proposals do not conflict with the Primary and Secondary Shopping Frontages** in city and district centres in line with Retail and Leisure Study

xi. **Ensuring that proposals in the amended district centre boundaries are town centre compatible uses**

xii. **Resisting the expansion of private language schools**

xiii. **Protecting existing hospital sites** for hospital related uses, allowing some diversification

xiv. **Allowing new primary healthcare facilities** in accessible locations

xv. Providing facilities just outside the city centre to the North/South for tourist coach drop off and pick up, with tourist coach parking provided at Park and Ride sites

xvi. **Allowing water-compatible uses and essential infrastructure in flood zone 3b** (the functional floodplain)

xvii. **Allowing development on brownfield sites in flood zone 3b,** with very high standards of flood mitigation measures and reduced run-off required.

xviii. **Safeguarding land that would be required to deliver the potential expansion of the Cowley branch line** into a passenger railway line and the potential new stations

9.14 Protection of sites from development/redevelopment. Some of these sites will be protected by general policies relating to the use of the sites, for example pubs. Some of the larger and more significant sites will also have a more typical site allocations policy relating specifically with that site, and dealing with issues such as potential for improved access and consolidated parking arrangements, shared open spaces and the potential for intensification and diversification to a wider range of uses (though overarching protection policies not typically Site Allocations):

xix. **Protecting all other (non-Category 1) employment sites** that provide important local services and maintain a diverse employment base (sites other than Category 1 sites that are identified in the Employment Land Assessment)

xx. **Protecting sites that are identified as part of the Green Infrastructure Network** through the Green Infrastructure Study

xxi. **Protecting the Special Area of Conservation, Sites of Special Scientific Interest, Local Nature Reserve, Local Wildlife Sites, Wildlife Corridors** and other sites with biodiversity interest (those with recorded **protected species**).

xxii. **Protecting playing pitches and allotments** unless criteria are met such as replacement nearby or improvement to nearby facilities or demonstration they are surplus to requirements

xxiii. **Protecting pubs,** using a criteria based approach requiring evidence of diversification to establish a wider customer base; lack of viability with marketing a key component

xxiv. **Protecting community facilities,** allowing loss under certain circumstances, such as replacement nearby; or improvement to nearby facilities; or demonstration they are surplus to requirements; or that opportunities have been explored for multi-use

xxv. **Protecting existing state primary and secondary school sites** and support extensions and more intensive uses on site.

9.15   It is important to note that should the general policy approach change from that set out in the Preferred Options (for example an alternative option is taken forward instead), this may well have a spatial implication and the appropriate use for a site might change.

9.16   At this Preferred Options stage we have also considered information obtained through our Calls for Sites where landowners and developers have promoted sites and provided their justification for certain uses. This information has helped assess the sites against the Preferred Options spatial implications above. **We may not have obtained information from some landowners/developers for some time so we will use this consultation to update our information on intentions for sites and to make factual updates.** We will contact landowners again if we are still missing up-to-date information.

9.17   Table 4 and Table 5 show the outcomes of the sites assessment process. Table 4 shows the sites that were rejected, with the reason for rejection, and Table 5 shows the sites that are recommended for further investigation. It includes which uses, if any, the sites should be allocated for on the basis of the strategy, Preferred Options and landowner/developer information.

Next steps

9.18   The site allocations are being progressed alongside the overarching Local Plan strategy and the Preferred Options for delivering it. Depending on the outcome of consultation, and further evidence gathering, the refined policy approach might change from the Preferred Option which in turn might affect the appropriateness of the site allocations as listed in Table 4 and Table 5. Further work to be undertaken which might affect the site allocations are:

- Detailed assessment of individual sites against the refined policy approach including *Sustainability Appraisal* of individual sites;
- Updated information on land ownership intentions and deliverability identified through the consultation and make any further contact if required;
- Strategic Flood Risk Assessment and Sequential Test;
- Updated *Housing and Employment Land Availability Assessment* (HELAA) to assess capacities against refined policy approach to reflect any changes in housing capacity flowing from housing mix, densities, open space requirements etc.;
- Updated *Strategic Housing Market assessment* to identify Oxford's housing need;
- *Housing Viability Study* to understand viability of developments.

Map 9: Rejected Sites

Table 4: Rejected Sites

Ref no	Site name	Ward	REJECT ST 1 (SAC/SSSI, Greenfield F230, <0.25ha, under construction)	REJECT ST 2 (SA, Green Infrastructure Network/no access)	Broad assessment against preferred Options	Further work required with landowner/developer on deliverability and suitability	Refinement of uses assuming suitability and deliverability
Under construction/built							
005	Avis site	Jericho and Osney	REJECTED - under construction				
041	Northway Centre	Headington Hill and Northway	REJECTED - under construction				
056	South Park Depot, Cheney Lane	St Clement's	REJECTED - under construction				
060	Travis Perkins, Chapel Street	St Clement's	REJECTED - under construction				
085	Hooper House	St Clement's	REJECTED - under construction				
091	Keble College, former Acland Hosp, 46 Woodstock Rd, 25 Banbury Rd	North	REJECTED - under construction				
093	333 Banbury Road	Summertown	REJECTED - under construction				
094	376 Banbury Road	Summertown	REJECTED - under construction				
352	Balfour Road	Blackbird Leys	REJECTED - under construction				
441	Fairfield Residential Care Home	St Margaret's	REJECTED - under construction				
015	Cowley Community Centre, Barns Road	Cowley	REJECTED - built				
037	Marywood House, Leiden Rd	Churchill	REJECTED - built				
418	Ruskin College, Walton Street	Jericho and Osney	REJECTED - built				
SSSI/SAC							
290	Shotover Country Park	Lye Valley	REJECTED - SSSI				
524	Wolvercote Green	Wolvercote	REJECTED - SSSI				
528	Magdalen Quarry Nature Reserve	Quarry and Risinghurst	REJECTED - SSSI				
529	Rock Edge Nature Reserve	Headington	REJECTED - SSSI				
530	Lye Valley	Lye Valley	REJECTED - SSSI				
548	Iffley Meadows - South of Donnington Bridge	Hinksey Park	REJECTED - SSSI				
551	Land East of Wolfson College Boathouse	Marston	REJECTED - SSSI				
553	Green Belt Land East of University Parks	Marston	REJECTED - SSSI				
557	Pixey Mead SSSI	Wolvercote	REJECTED - SSSI				
558a	Hook Meadow and the Trap Grounds (West)	Wolvercote	REJECTED - SSSI				
558b	Hook Meadow and the Trap Grounds (Central)	Wolvercote	REJECTED - SSSI				
558c	Hook Meadow and the Trap Grounds (South)	Summertown	REJECTED - SSSI				
279	Port Meadow	Jericho and Osney	REJECTED - SAC				
Less than 0.25ha							
090	Westlands Drive former community centre	Headington Hill and Northway	REJECTED - Less than 0.25ha				
096	Land adjacent to TK Maxx	Cowley	REJECTED - Less than 0.25ha				
098	Workshops Lanham Way	Littlemore	REJECTED - Less than 0.25ha				
099	Rear of 2 Dynham Place	Churchill	REJECTED - Less than 0.25ha				
100	63 Abingdon Road	Hinksey Park	REJECTED - Less than 0.25ha				
101	Broad Oak land	Churchill	REJECTED - Less than 0.25ha				
102	Chillingworth Crescent Playground, (between Bracegirdle and Chillingworth)	Churchill	REJECTED - Less than 0.25ha				

![Oxford City Council logo]

Ref no	Site name	Ward	REJECT ST 1 (SACGSS; Greenfield F230; <0.25ha; under construction)	REJECT ST 2 (SA: Green Infrastructure Network; no access)	Broad assessment against preferred Options	Further work required with landowner/developer on deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
103	Church Hall Edgecombe Road	Barton and Sandhills	REJECTED - Less than 0.25ha				
108	Jubilee Hall	Blackbird Leys	REJECTED - Less than 0.25ha				
109	Rose Hill Scout Hut	Rose Hill and Iffley	REJECTED - Less than 0.25ha				
143	Land off Aristotle Lane	St Margaret's	REJECTED - Less than 0.25ha				
146	Land at Stone Meadow	St Margaret's	REJECTED - Less than 0.25ha				
201	Downside Dip	Quarry and Risinghurst	REJECTED - Less than 0.25ha				
232	Ingle Close Allotments	Headington Hill and Northway	REJECTED - Less than 0.25ha				
282	Ridgefield Road Recreation Ground	Cowley Marsh	REJECTED - Less than 0.25ha				
296	St Andrews Primary School Playing Field	Quarry and Risinghurst	REJECTED - Less than 0.25ha				
322	Town Furze Allotments	Churchill	REJECTED - Less than 0.25ha				
324	Union Street Complex	St Clement's	REJECTED - Less than 0.25ha				
332	Walton Well Road Open Space – South	North	REJECTED - Less than 0.25ha				
334	Wellington Square	Carfax	REJECTED - Less than 0.25ha				
342	Land at Collins Street	St Clement's	REJECTED - Less than 0.25ha				
343	Canterbury House and adjacent land	Cowley Marsh	REJECTED - Less than 0.25ha				
344	Land and building at south east end of MaNor Place	Holywell	REJECTED - Less than 0.25ha				
345	Land at Jowett Walk	Holywell	REJECTED - Less than 0.25ha				
350	Alice Smith House	Littlemore	REJECTED - Less than 0.25ha				
353	149 Banbury Road	St Margaret's	REJECTED - Less than 0.25ha				
363	Cumberledge House	Marston	REJECTED - Less than 0.25ha				
367	Eastern House	Littlemore	REJECTED - Less than 0.25ha				
369	Bainton Road Nursery (Former Bowling Green)	St Margaret's	REJECTED - Less than 0.25ha				
371	Garage Block off Raymund Road	Marston	REJECTED - Less than 0.25ha				
372	Garages Between 102 and 104 The Slade	Churchill	REJECTED - Less than 0.25ha				
373	Garages to the rear of Anchor House, 269 Banbury Road	Summertown	REJECTED - Less than 0.25ha				
384	Jowett walk (east)	Central	REJECTED - Less than 0.25ha				
386	Land Adjacent to 3 Bullingdon Road	St Mary's	REJECTED - Less than 0.25ha				
392	Land east of Abingdon Road (North)	Hinksey Park	REJECTED - Less than 0.25ha				
394	Land north of 8 Headley Way	Headington Hill and Northway	REJECTED - Less than 0.25ha				
396	Land Rear of Green Ridges	Barton and Sandhills	REJECTED - Less than 0.25ha				
400	Leiden Road Health Centre	Churchill	REJECTED - Less than 0.25ha				
410	Parchment Printworks, Crescent Road	Cowley Marsh	REJECTED - Less than 0.25ha				
412	Pusey House site	Carfax	REJECTED - Less than 0.25ha				
414	River Hotel and 3-15 Botley Road	Jericho and Osney	REJECTED - Less than 0.25ha				
419	Saxon Centre, Saxon Way	Headington Hill and Northway	REJECTED - Less than 0.25ha				
422	2-5 South Parade, Summertown	Summertown	REJECTED - Less than 0.25ha				
423	St Leonard's Car Park, Headington	Headington	REJECTED - Less than 0.25ha				
425	The Friar Public House	Marston	REJECTED - Less than 0.25ha				
427	The Old Dairy	Headington	REJECTED - Less than 0.25ha				
428	The Rectory Centre (27-29 Rectory Road)	St Clement's	REJECTED - Less than 0.25ha				
429	Tumbledown House in Old High Street	Headington	REJECTED - Less than 0.25ha				

433	Westgate Hotel and 1-7 Mill Street	Jericho and Osney	REJECTED - Less than 0.25ha
444	Mansfield College	Holywell	REJECTED - Less than 0.25ha
445	Grehan House	Blackbird Leys	REJECTED - Less than 0.25ha
446	Bryan Gelder Joinery, 7 Jack Straw Lane	Headington Hill and Northway	REJECTED - Less than 0.25ha
447	Wadham Court	Marston	REJECTED - Less than 0.25ha
450	Housing Amenity Land, Sorrell Road	Blackbird Leys	REJECTED - Less than 0.25ha
451	Housing Amenity Land, Jordan Hill Road	Wolvercote	REJECTED - Less than 0.25ha
452	Housing Amenity Land, David Walter Close	Wolvercote	REJECTED - Less than 0.25ha
456	242-254 Banbury Road	Summertown	REJECTED - Less than 0.25ha
457	Site Of 138 Hollow Way & Land rear of 144/146 Hollow Way	Lye Valley	REJECTED - Less than 0.25ha
458	4 to 8 Botley Road	Jericho and Osney	REJECTED - Less than 0.25ha
488	SLINC at end of Lewis Close	Quarry and Risinghurst	REJECTED - Less than 0.25ha
493	Site at corner of Hayfield Road and Aristotle Lane	St Margaret's	REJECTED - Less than 0.25ha
500	Builders Yard, Southmoor Road	North	REJECTED - Less than 0.25ha
501	Car and Exhaust depot, 302 Abingdon Road	Hinksey Park	REJECTED - Less than 0.25ha
504	Dairy Depot, Old Abingdon Road	Hinksey Park	REJECTED - Less than 0.25ha
505	Enterprise Centre, Standingford House, Cave Street	Hinksey Park	REJECTED - Less than 0.25ha
507	Garage Repair workshop, 2A off Hayfield Road	St Margaret's	REJECTED - Less than 0.25ha
508	Green St. Bindery 9 Green Street	St Mary's	REJECTED - Less than 0.25ha
511	J H Cox Ltd, Builders Yard, 108 Temple Road	Cowley Marsh	REJECTED - Less than 0.25ha
517	Quarry Motoring Centre, Green Road	Quarry and Risinghurst	REJECTED - Less than 0.25ha
518	Storage building, 91-99 Botley Road	Jericho and Osney	REJECTED - Less than 0.25ha
519	Summertown Pavilion, 16-24 Middle Way	Summertown	REJECTED - Less than 0.25ha
521	The Tyre Depot, Marsh Road	Cowley Marsh	REJECTED - Less than 0.25ha
522	Tyre and Exhaust centre, 72 London Road	Headington	REJECTED - Less than 0.25ha
526	Thames View Road	Rose Hill and Iffley	REJECTED - Less than 0.25ha
541	St Giles Churchyard	Carfax	REJECTED - Less than 0.25ha
542	Mary Magdalen Cemetery	Carfax	REJECTED - Less than 0.25ha
559	263 Iffley Road - Gladiator Club	Iffley Fields	REJECTED - Less than 0.25ha
561	Jack FM - 270-272 Woodstock Road	Summertown	REJECTED - Less than 0.25ha
571	St Margaret's Road	St Margaret's	REJECTED - Less than 0.25ha
572	Isis Guesthouse	St Mary's	REJECTED - Less than 0.25ha
575	71 Hill Top Road	St Clement's	REJECTED - Less than 0.25ha
576	38-40 Woodstock Road	North	REJECTED - Less than 0.25ha
581	59-60 High Street	Holywell	REJECTED - Less than 0.25ha
582	95-97 St Aldates	Carfax	REJECTED - Less than 0.25ha
583	105-106 St Aldates	Carfax	REJECTED - Less than 0.25ha
584	KJ Waynflete & 1-11 St Clement	St Clement's	REJECTED - Less than 0.25ha
563a	St Stephen's House - Moberly Close	St Mary's	REJECTED - Less than 0.25ha
563b	St Stephen's House - Car Park	St Mary's	REJECTED - Less than 0.25ha
573	Circus Street Houses	St Mary's	REJECTED - Less than 0.25ha
563c	St Stephen's House - St John Church	St Mary's	REJECTED - Less than 0.25ha

Flood Zone 3b greenfield

119	Land south of Ulfgar Road	Wolvercote	REJECTED - Greenfield FZ3b
126	Land at River Cherwell 8	St Margaret's	REJECTED - Greenfield FZ3b
127	Land north of South Hinksey	Hinksey Park	REJECTED - Greenfield FZ3b

Oxford
Local Plan 2036

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Preferred Options Document
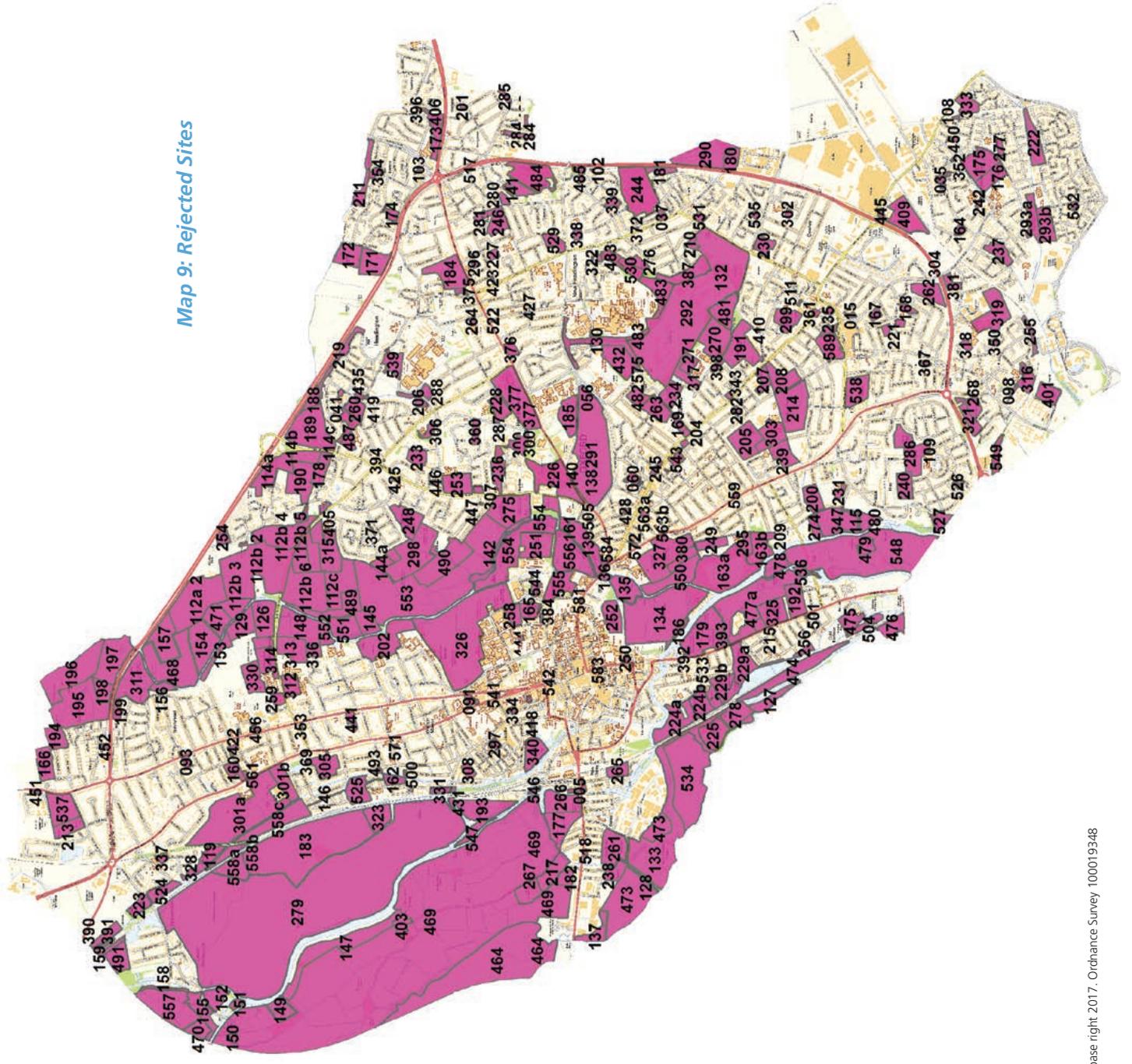
Ref no	Site name	Ward	REJECT ST 1 (SAC/SSSI; Greenfield FZ3b; <0.25ha; under construction)	REJECT ST 2 (SA; Green Infrastructure Network; no access)	Broad assessment against preferred Options	Further work required with landowner/developer on deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
128	Tree belt north of North Hinksey	Jericho and Osney	REJECTED - Greenfield FZ3b				
129	Land at River Cherwell 9	St Margaret's	REJECTED - Greenfield FZ3b				
131	Land at River Cherwell 4	Holywell	REJECTED - Greenfield FZ3b				
133	Land Adjacent North Hinksey Village	Jericho and Osney/Hinksey Park	REJECTED - Greenfield FZ3b				
134	Land at Christ Church Meadow	Holywell	REJECTED - Greenfield FZ3b				
135	Land at River Cherwell 1	Holywell	REJECTED - Greenfield FZ3b				
137	Land to the West of Seacourt Stream	Jericho and Osney	REJECTED - Greenfield FZ3b				
139	Land at River Cherwell 3 (Angel and Greyhound)	Holywell	REJECTED - Greenfield FZ3b				
142	Land at River Cherwell 5	Holywell	REJECTED - Greenfield FZ3b				
145	Land at River Cherwell 6	Marston	REJECTED - Greenfield FZ3b				
147	Land north of Binsey	Jericho and Osney	REJECTED - Greenfield FZ3b				
148	Land at River Cherwell 7	St Margaret's	REJECTED - Greenfield FZ3b				
149	Land at Godstow Holt	Wolvercote	REJECTED - Greenfield FZ3b				
150	Land at West Godstow Road	Wolvercote	REJECTED - Greenfield FZ3b				
151	Land at St Edward's Boat Yard	Wolvercote	REJECTED - Greenfield FZ3b				
152	Land at Lower Wolvercote South of Godstow Road	Wolvercote	REJECTED - Greenfield FZ3b				
153	Land at River Cherwell 10	Summertown	REJECTED - Greenfield FZ3b				
154	Land at River Cherwell 11	Marston	REJECTED - Greenfield FZ3b				
155	Land at Lower Wolvercote north of Godstow Road	Wolvercote	REJECTED - Greenfield FZ3b				
161	Angel and Greyhound Meadow	Holywell	REJECTED - Greenfield FZ3b				
162	Aristotle Lane	North	REJECTED - Greenfield FZ3b				
177	Botley Road Recreation Ground	Jericho and Osney	REJECTED - Greenfield FZ3b				
179	BraseNose College and Queens College Sports Ground	Hinksey Park	REJECTED - Greenfield FZ3b				
182	Bullstake Close Allotments	Jericho and Osney	REJECTED - Greenfield FZ3b				
186	Christ Church Meadow – South	Holywell	REJECTED - Greenfield FZ3b				
192	Cowmead Allotments	Hinksey Park	REJECTED - Greenfield FZ3b				
200	Donnington Sports Ground, (Donnington recreation ground)	Rose Hill and Iffley	REJECTED - Greenfield FZ3b				
207	Elder Stubbs Charity Allotments – North	Cowley Marsh	REJECTED - Greenfield FZ3b				
208	Elder Stubbs Charity Allotments – South	Cowley Marsh	REJECTED - Greenfield FZ3b				
214	Florence Park	Cowley	REJECTED - Greenfield FZ3b				
215	Former Abingdon Road Allotments	Hinksey Park	REJECTED - Greenfield FZ3b				
217	Former Binsey Lane Allotments	Jericho and Osney	REJECTED - Greenfield FZ3b				
225	Hogacre Common	Hinksey Park	REJECTED - Greenfield FZ3b				
238	King Georges Field	Jericho and Osney	REJECTED - Greenfield FZ3b				
239	Larkrise Primary School Playing Field	Iffley Fields	REJECTED - Greenfield FZ3b				
247	Marston Ferry and Blackhall Allotments	St Margaret's	REJECTED - Greenfield FZ3b				
249	Meadow Lane Recreation Ground	Iffley Fields	REJECTED - Greenfield FZ3b				
256	New Hinksey Bowling Green	Hinksey Park	REJECTED - Greenfield FZ3b				
261	Oatlands Recreation Ground	Jericho and Osney	REJECTED - Greenfield FZ3b				
266	Osney St. Thomas Allotments	Jericho and Osney	REJECTED - Greenfield FZ3b				
267	Oxford Golf Centre	Jericho and Osney	REJECTED - Greenfield FZ3b				

274	Park Adjacent Rowing Clubs	Iffley Fields	REJECTED - Greenfield FZ3b
278	Pembroke College Sports Ground	Hinksey Park	REJECTED - Greenfield FZ3b
294	Spragglesea Mead and Deans Ham Allotments	Hinksey Park	REJECTED - Greenfield FZ3b
298	St Catherines, Exeter, Hertford College Sports Grounds	Marston	REJECTED - Greenfield FZ3b
303	St Gregory the Great Playing Field	Iffley Fields	REJECTED - Greenfield FZ3b
323	Trap Grounds Allotments	St Margaret's	REJECTED - Greenfield FZ3b
325	University College Sports Ground	Hinksey Park	REJECTED - Greenfield FZ3b
336	Wolfson College Playing Field	St Margaret's	REJECTED - Greenfield FZ3b
347	Iffley Meadow	Rose Hill and Iffley	REJECTED - Greenfield FZ3b
380	Iffley Road Sports Centre (west)	St Mary's	REJECTED - Greenfield FZ3b
390	Land at Wolvercote Viaduct (west of canal)	Wolvercote	REJECTED - Greenfield FZ3b
391	Land at Wolvercote Viaduct (east of canal)	Wolvercote	REJECTED - Greenfield FZ3b
393	Land east of Abingdon Road (south)	Hinksey Park	REJECTED - Greenfield FZ3b
464	Land adjacent Seacourt P&R	Jericho and Osney	REJECTED - Greenfield FZ3b
468	Sunnymead	Marston	REJECTED - Greenfield FZ3b
469	North of Botley Road/around Binsey/Cripley Meadow	Jericho and Osney	REJECTED - Greenfield FZ3b
470	Land north of Godstow Bridge	Wolvercote	REJECTED - Greenfield FZ3b
471	SLINC north of Marston Ferry	Marston	REJECTED - Greenfield FZ3b
473	Land west of Willow walk & site to east – an extension of Bulstake stream SLINC site.	Jericho and Osney	REJECTED - Greenfield FZ3b
476	Kendal's Copse	Hinksey Park	REJECTED - Greenfield FZ3b
478	SLINC to north of Wiers Lane (Long Bridge Nature Park)	Hinksey Park	REJECTED - Greenfield FZ3b
479	Isis Hotel (Now Isis pub) and surrounding SLINC area	Hinksey Park	REJECTED - Greenfield FZ3b
480	Meadow Lane/opposite Isis boat house, (extension to site #347)	Rose Hill and Iffley	REJECTED - Greenfield FZ3b
489	Marston – gap between SSSI	Marston	REJECTED - Greenfield FZ3b
490	Park Farm and adjoining SLINC/CS12 area	Marston	REJECTED - Greenfield FZ3b
525	Traps Grounds Nature Area	St Margaret's	REJECTED - Greenfield FZ3b
534	Grandpont Nature Reserve and Whitehouse Road	Jericho and Osney	REJECTED - Greenfield FZ3b
536	Donnington Riverside	Hinksey Park	REJECTED - Greenfield FZ3b
546	Sidling Island	Jericho and Osney	REJECTED - Greenfield FZ3b
547	Fiddler's Island	Jericho and Osney	REJECTED - Greenfield FZ3b
550	Green Belt Land East of Iffley Road	St Mary's	REJECTED - Greenfield FZ3b
552	Land East of Wolfson College	St Margaret's	REJECTED - Greenfield FZ3b
554	Long Meadow	Holywell	REJECTED - Greenfield FZ3b
556	The Water Meadow	Holywell	REJECTED - Greenfield FZ3b
229a	Hinksey Park	Hinksey Park	REJECTED - Greenfield FZ3b
229b	Dean's Ham	Hinksey Park	REJECTED - Greenfield FZ3b
477a	Land behind Four Pillars Hotel, Abingdon Road	Hinksey Park	REJECTED - Greenfield FZ3b

Green Infrastructure

230	Horspath Road Recreation Ground	Lye Valley	No	REJECTED - GI
268	Oxford Road (Littlemore) Park	Littlemore	No	REJECTED - GI
269	Oxford Road (Marston) Recreation Ground	Marston	No	REJECTED - GI
280	Quarry Hollow Play Area	Quarry and Risinghurst	No	REJECTED - GI
285	Risinghurst Recreation Ground	Quarry and Risinghurst	No	REJECTED - GI
288	Sandfield Road	Headington	No	REJECTED - GI

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112a2	Green Belt land at Cherwell Valley/Old Marston, (southern part of previous site 112), (includes Hill View Farm, Land at Mill Lane) Green Belt Parcel 2	Marston	No	REJECTED - GI		
140	Land at Headington Hill Park	Headington Hill and Northway	No	REJECTED - GI		
115	Green Belt land west of Meadow Lane	Rose Hill and Iffley	No	REJECTED - GI		
118	Land rear of Wolvercote Social Club	Wolvercote	No	REJECTED - GI		
130	Land at Warneford Meadow	Churchill	No	REJECTED - GI		
132	Land at centre of Southfield Golf Course	Cowley Marsh	No	REJECTED - GI		
136	Land at River Cherwell 2	Holywell	No	REJECTED - GI		
138	Land at South Park	St Clement's	No	REJECTED - GI		
156	Land at River Cherwell 12	Summertown	No	REJECTED - GI		
157	Land at Hill Farm	Marston	No	REJECTED - GI		
158	Land South of Pixey Mead	Wolvercote	No	REJECTED - GI		
159	Land Adjacent to Duke's Meadow	Wolvercote	No	REJECTED - GI		
160	Alexandra Courts Recreation Ground, (Alexander Park, Woodstock Road)	Summertown	No	REJECTED - GI		
164	Balfour Park	Blackbird Leys	No	REJECTED - GI		
174	Bernwood Park	Barton and Sandhills	No	REJECTED - GI		
175	Blackbird Leys Park East	Blackbird Leys	No	REJECTED - GI		
176	Blackbird Leys Park West	Blackbird Leys	No	REJECTED - GI		
180	BraseNose Farm Allotments	Lye Valley	No	REJECTED - GI		
181	Broad Oak Nature Park	Churchill	No	REJECTED - GI		
183	Burgess Field, (edge of Port Meadow)	Summertown	No	REJECTED - GI		
184	Bury KNowle Park	Barton and Sandhills	No	REJECTED - GI		
193	Cripley Meadow Allotments	Jericho and Osney	No	REJECTED - GI		
194	Cutteslowe Park 1	Wolvercote	No	REJECTED - GI		
195	Cutteslowe Park 2	Wolvercote	No	REJECTED - GI		
196	Cutteslowe Park 3	Wolvercote	No	REJECTED - GI		
197	Cutteslowe Park 4	Wolvercote	No	REJECTED - GI		
198	Cutteslowe Park Allotments	Wolvercote	No	REJECTED - GI		
211	Fettiplace Recreation Ground	Barton and Sandhills	No	REJECTED - GI		
222	Gillians Park	Northfield Brook	No	REJECTED - GI		
223	Goose Green	Wolvercote	No	REJECTED - GI		
226	Headington Hill Park	Headington Hill and Northway	No	REJECTED - GI		
233	Jack Straws Lane Park	Headington Hill and Northway	No	REJECTED - GI		
235	John Allen Recreation Ground	Cowley	No	REJECTED - GI		
244	Magdalen Wood	Churchill	No	REJECTED - GI		
245	Manzil Way Gardens	St Clement's	No	REJECTED - GI		
250	Memorial Garden	Holywell	No	REJECTED - GI		
253	Milham Ford Playing Field, Headington	Headington Hill and Northway	No	REJECTED - GI		
263	Oriel College Sports Ground	St Clement's	No	REJECTED - GI		

275	Part Trinity and Magdalen Sports Grounds – North	Marston	REJECTED - GI	No
276	Peat Moors Recreation Ground	Lye Valley	REJECTED - GI	No
291	South Park	St Clement's	REJECTED - GI	No
295	SS Mary and John Primary School Playing Field	Iffley Fields	REJECTED - GI	No
308	St Sepulchre's Cemetery	North	REJECTED - GI	No
311	Sunnymead Park	Summertown	REJECTED - GI	No
313	Harlequins Rugby Ground	St Margaret's	REJECTED - GI	No
326	University Parks	North	REJECTED - GI	No
328	Upper Wolvercote Allotments	Wolvercote	REJECTED - GI	No
331	Walton Well Road Open Space – North	North	REJECTED - GI	No
340	Worcester College Cricket Ground	Jericho and Osney	REJECTED - GI	No
387	Land Adjacent to Lye Valley	Cowley Marsh	REJECTED - GI	No
398	Land rear of Reliance Way	Cowley Marsh	REJECTED - GI	No
432	Warneford Meadow	Churchill	REJECTED - GI	No
472	Extension to Colthorn farm site #359	Marston	REJECTED - GI	No
474	Extension to site #127	Hinksey Park	REJECTED - GI	No
475	Land adjacent Cold Harbour campsite and behind Go Outdoors	Hinksey Park	REJECTED - GI	No
481	North of Barracks Lane SLINC	Cowley Marsh	REJECTED - GI	No
482	Back gardens to Rear of Hill Top Road	St Clement's	REJECTED - GI	No
483	Boundary Brook SLINC	Cowley Marsh	REJECTED - GI	No
484	Extension of Stansfeld study centre (#437)	Quarry and Risinghurst	REJECTED - GI	No
485	SLINC Dorchester close	Quarry and Risinghurst	REJECTED - GI	No
486	SLINC off fielden grove	Headington Hill and Northway	REJECTED - GI	No
487	Add in SLINC at peasmore piece, Northway	Headington Hill and Northway	REJECTED - GI	No
491	East of Wolvercote Paper Mill site (Nixey's Field)	Wolvercote	REJECTED - GI	No
527	Rivermead Nature Reserve	Rose Hill and Iffley	REJECTED - GI	No
544	Holywell Churchyard	Holywell	REJECTED - GI	No
549	Scrub by Little Heyford Hill Roundabout	Littlemore	REJECTED - GI	No
555	Magdalen Grove	Holywell	REJECTED - GI	No
163a	Astons Eyot	Iffley Fields	REJECTED - GI	No
163b	The Kidneys	Iffley Fields	REJECTED - GI	No
224a	Grandpont Park	Hinksey Park	REJECTED - GI	No
224b	Grandpont Playing Pitch	Hinksey Park	REJECTED - GI	No
293a	Spindleberry Nature Park	Northfield Brook	REJECTED - GI	No
293b	Fry's Hill Park	Northfield Brook	REJECTED - GI	No
301a	St Edwards School Playing Fields	Summertown	REJECTED - GI	No
301b	Keble College Sports Ground	Summertown	REJECTED - GI	No
577	Boundary Brooke Nature Reserve	Iffley Fields	REJECTED - GI	No
532	Mistletoe Green Park	Northfield Brook	REJECTED - GI	No
533	Whitehouse Road Adventure Playground	Hinksey Park	REJECTED - GI	No

Access/Noise

141	Land at Headington Quarry Glebe	Quarry and Risinghurst	REJECTED - ACCESS	No
221	Gaisford Road Recreation Ground	Cowley	REJECTED - ACCESS	No
219	Foxwell Drive	Headington Hill and Northway	REJECTED - NOISE	No
535	Ridley Road Recreation Ground	Lye Valley	REJECTED - ACCESS	No

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403	MaNor Farm, Binsey	Jericho and Osney	No	No	REJECTED - ACCESS		
Sports or community use							
339	Wood Farm Recreation Ground, (between Nuffield Road and Wood Farm Road)	Churchill	No	No	REJECTED - SPORTS (unlesss evidence provided)		
292	Southfield Golf Course	Cowley Marsh	No	PART - GI	REJECTED - SPORTS (unlesss evidence provided)	Because of the open air sports use the site would only be considered further if there is landowner interest and it is suggested improvements to public open space would be achieved. In this case the landowner has Stated they are have no interest in developing the site at the current time.	
248	Marston Recreation Ground	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)		
262	Herschel Cresent Recreation Ground	Littlemore	No	No	REJECTED - SPORTS (unlesss evidence provided)		
286	Rose Hill Spencer Crescent Park	Rose Hill and Iffley	No	No	REJECTED - SPORTS (unlesss evidence provided)		
178	Boults Lane Recreation Ground	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)		
165	Balliol College Sports Ground	Holywell	No	No	REJECTED - SPORTS (unlesss evidence provided)		
166	Banbury Road North Sports Club	Wolvercote	No	No	REJECTED - SPORTS (unlesss evidence provided)		
172	Barton Village Sports Ground	Barton and Sandhills	No	No	REJECTED - SPORTS (unlesss evidence provided)		
173	Bayards Hill Primary School Playing Fields	Barton and Sandhills	No	No	REJECTED - SPORTS (unlesss evidence provided)		
185	Cheney School Playing Fields	Churchill	No	No	REJECTED - SPORTS (unlesss evidence provided)		
187	Church Cowley Primary School Playing Field	Cowley	No	No	REJECTED - SPORTS (unlesss evidence provided)		

	Name	Area		Status
188	Court Place Farm – East	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)
189	Court Place Farm – West	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)
191	Cowley Marsh playground/sports field	Cowley Marsh	No	No	REJECTED - SPORTS (unlesss evidence provided)
199	Cutteslowe Primary School Playing Fields	Summertown	No	No	REJECTED - SPORTS (unlesss evidence provided)
202	Dragon School & Lady Margaret Hall Playing Fields	North	No	No	REJECTED - SPORTS (unlesss evidence provided)
213	Five Mile Drive Recreation Ground	Wolvercote	No	No	REJECTED - SPORTS (unlesss evidence provided)
227	Headington Middle School Playing Field	Headington	No	No	REJECTED - SPORTS (unlesss evidence provided)
228	Headington School Playing Fields	Headington Hill and Northway	No	No	REJECTED - SPORTS (unlesss evidence provided)
231	Iffley Mead School Playing Field	Rose Hill and Iffley	No	No	REJECTED - SPORTS (unlesss evidence provided)
234	Jesus College Playing Field – North	Cowley Marsh	No	No	REJECTED - SPORTS (unless evidence
242	Mabel Pritchard School Playing Field	Blackbird Leys	No	No	RREJECTED - SPORTS (unlesss evidence provided)
243	Magdalen College Sports Ground – South	St Clement's	No	No	REJECTED - SPORTS (unlesss evidence provided))
246	Margaret Road Recreation Ground	Quarry and Risinghurst	No	No	REJECTED - SPORTS (unlesss evidence provided)
251	Merton College Sports Ground	Holywell	No	No	REJECTED - SPORTS (unlesss evidence provided)
257	New Marston Primary School Playing Fields	Headington Hill and Northway	No	No	REJECTED - SPORTS (unlesss evidence provided)
258	New University Club Sports Ground	Holywell	No	No	REJECTED - SPORTS (unlesss evidence provided)
259	North Oxford Bowls Club	St Margaret's	No	No	REJECTED - SPORTS (unlesss evidence provided)
260	Northway Playing Field	Headington Hill and Northway	No	No	REJECTED - SPORTS (unlesss evidence provided)
264	Osler Road Bowling Green	Headington	No	No	REJECTED - SPORTS (unlesss evidence provided)
270	Oxford Spires Academy Playing Field - East	Cowley Marsh	No	No	REJECTED - SPORTS (unlesss evidence provided)
271	Oxford Spires Academy Playing Field – West	Cowley	No	No	REJECTED - SPORTS (unlesss evidence provided)
277	Pegasus Primary School Playing Field	Blackbird Leys	No	No	REJECTED - SPORTS (unlesss evidence provided)
287	Rye St Anthony School Playing Fields	Headington Hill and Northway	No	No	REJECTED - SPORTS (unlesss evidence provided)

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297	St Barnabus Primary School Playing Fields	Jericho and Osney	No	No	REJECTED - SPORTS (unlesss evidence provided)		
299	St Christophers First School Playing Fields	Cowley Marsh	No	No	REJECTED - SPORTS (unlesss evidence provided)		
302	St Francis Primary School Playing Field	Lye Valley	No	No	REJECTED - SPORTS (unlesss evidence provided)		
304	St John Fisher School Playing Field	Littlemore	No	No	REJECTED - SPORTS (unlesss evidence provided)		
305	St John's, Keble and St Hugh's Sports Ground	St Margaret's	No	No	REJECTED - SPORTS (unlesss evidence provided)		
306	St Joseph's Primary School Playing Field	Headington Hill and Northway	No	No	REJECTED - SPORTS (unlesss evidence provided)		
307	St Michaels Primary School Playing Field	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)		
312	The Cherwell School Playing Fields – Central	St Margaret's	No	No	REJECTED - SPORTS (unlesss evidence provided)		
314	The Cherwell School Playing Fields – North	St Margaret's	No	No	REJECTED - SPORTS (unlesss evidence provided)		
315	The Harlow Centre Playing Fields	Marston	No	No	REJECTED - SPORTS (unlesss evidence provided)		
252	Merton Field	Holywell	No	No	REJECTED - SPORTS (unlesss evidence provided)		
531	Hundred Acre Park	Lye Valley	No	No	REJECTED - SPORTS (unlesss evidence provided)		
316	The John Henry Newman Academy Playing Fields	Littlemore	No	No	REJECTED - SPORTS (unlesss evidence provided)		
318	The Oxford Academy Playing Field – North	Littlemore	No	No	REJECTED - SPORTS (unlesss evidence provided)		
319	The Oxford Academy Playing Field – South	Littlemore	No	No	REJECTED - SPORTS (unlesss evidence provided)		
327	University Sports Centre	St Mary's	No	No	REJECTED - SPORTS (unlesss evidence provided)		
330	Wadham College Playing Field	St Margaret's	No	No	REJECTED - SPORTS (unlesss evidence provided)		
337	Wolvercote Primary School Playing Field	Wolvercote	No	No	REJECTED - SPORTS (unlesss evidence provided)		
338	Wood Farm Primary School Playing Field	Churchill	No	No	REJECTED - SPORTS (unlesss evidence provided)		
204	East Oxford Bowls Club	St Clement's	No	No	REJECTED - SPORTS (unlesss evidence provided)		

No.	Site	Ward			Decision
354	Barton Community Centre and Underhill Circus shops	Barton and Sandhills	No	No	REJECTED - COMMUNITY FACILITY (unless evidence provided)
362	Cowley Road Bingo Hall	St Mary's	No	No	REJECTED - COMMUNITY FACILITY (unless evidence provided)
381	Indoor Bowling Centre, Sandy West Lane	Littlemore	No	No	REJECTED - COMMUNITY FACILITY (unless evidence provided)
421	Snooker Club, Cowley Workers Social Club and Church Hall, Between Towns Road	Cowley	No	No	REJECTED - COMMUNITY FACILITY (unless evidence provided)

No landowner interest or conflict with strategy

No.	Site	Ward			Decision
035	Longland, Balfour Road	Blackbird Leys	No	No	REJECTED - no current landowner interest
036	Marston Court, Marston Rd	Marston	No	No	REJECTED - no current landowner interest
405	Meadowbrook College, (Harlow Centre)	Marston	No	No	REJECTED - STATE SCHOOL SITE
406	Ormerod School	Barton and Sandhills	No	No	REJECTED - STATE SCHOOL SITE
376	Headington Preparatory School	Headington	No	No	REJECTED - no interest from school
377	Headington School	Headington Hill and Northway	No	No	REJECTED - no interest from school
435	Westlands Drive Shopping Parade	Headington Hill and Northway	No	No	REJECTED - no interest from landowner
401	Littlemore Park (SAE Institute)	Littlemore	No	No	REJECTED - no current landownerr interest
413	Redbridge Recycling Centre	Hinksey Park	No	No	REJECTED - no current landownerr interest
589	John Allen Centre (whole site)	Cowley	No	No	REJECTED - site not put forward since 2009 and no significant redevelopment or change of use is anticipated
409	Oxford Retail Park, Ambassador Avenue	Blackbird Leys	No	No	REJECTED - conflict with strategy. The site was considered in the Sites and Housing Plan, but was rejected because the landowner interest was in retail, as an out-of-centre location an allocation for retail would be contrary to the strategy. There has been

Ref no	Site name	Ward	REJECT ST 1 (SAC/SSSI; Greenfield F23b; <0.25ha; under construction)	REJECT ST 2 (SA; Green Infrastructure Network; no access)	Broad assessment against preferred Options	Further work required/developer/landowner deliverability and suitability	Refinement of uses/developer deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
361	Cowley Police Station	Cowley Marsh		No	no recent landowner interest, and allocation for retail would still be contrary to strategy.			
375	Headington Car Park	Headington		No	REJECTED - site unavailable			
431	Walton Well Road Car Park	Jericho and Osney		No	REJECTED - site unavailable			
360	Cotuit Hall	Headington Hill and Northway		No	REJECTED - landowner's only proposed uses of language school academic and student accommodation would be contrary to approach in Preferred Options.			
Allotments								
167	Barns Court Allotments	Cowley	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
168	Bartholomew Road and Van Diemans Lane Allotments	Littlemore	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
169	Bartlemas Close Allotments	St Clement's	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
171	Barton Fields Allotments	Barton and Sandhills	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
190	Court Place Farm Allotments	Marston	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
205	East Ward Allotments	Iffley Fields	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
206	Eden Drive Allotments	Headington Hill and Northway	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
209	Fairacres Road Allotments	Iffley Fields	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
210	Fairview Allotments	Cowley Marsh	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
236	John Garne Way Allotments	Headington Hill and Northway	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
237	Kestral Crescent Allotments	Northfield Brook	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
240	Lenthall Road Allotments	Rose Hill and Iffley	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			
254	Mill Lane Allotments	Marston	No	No	REJECTED - ALLOTMENTS (unless evidence provided)			

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ID	Site name	Area			Status
255	Minchery Farm Allotments (west)	Littlemore	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
281	Ramsay Road Allotments	Quarry and Risinghurst	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
284	Risinghurst Allotments	Quarry and Risinghurst	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
300	St Clements Pullens Lane Allotments	Headington Hill and Northway	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
317	The Links Barracks Lane Allotments	Cowley Marsh	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
321	Thomson Terrace Allotments	Littlemore	No	No	REJECTED - ALLOTMENTS (unless evidence provided)
333	Watlington Road Allotments	Blackbird Leys	No	No	REJECTED - ALLOTMENTS (unless evidence provided)

Green Belt no landowner interest or high/moderate-high harm

ID	Site name	Area			Status
112c	Land at Marston	Marston	No	No	REJECTED - Green Belt Moderate-high and High harm
112b 2-6	Land at Old Marston, (Northern part of previous site 112) Green Belt Parcels 2-6	Marston	No	No	REJECTED - Green Belt Moderate-high and High harm, apart from 112b-4 where the landowner has no intention of developing.
144a	Land at Marston Brook (Northern part)	Marston	No	No	"Not assessed due to no landowner interest in this area of Green Belt"
144b	Land at Marston Brook (southern part)	Marston	No	No	"Not assessed due to no landowner interest in this area of Green Belt"
114a	Green Belt land east of Old Marston, (includes Land at	Marston Marsh Lane, and Land at Butts Lane)	No	No	Not assessed due to no landowner interest in Green Belt
114b	Showmans Field	Marston	No	No	Not assessed due to no landowner interest in Green Belt
114c	Marston Saints Sports Ground	Marston	No	No	Not assessed due to no landowner interest in Green Belt

Cemetary/Churchyard

ID	Site name	Area			Status
537	Wolvercote Cemetery	Wolvercote	No	No	REJECTED - CEMETERY
539	Headington Cemetery	Headington	No	No	REJECTED - CEMETERY
545	Holy Trinity Churchyard	Quarry and Risinghurst	No	No	REJECTED - CHURCHYARD
265	Osney Cemetery	Jericho and Osney	No	No	REJECTED - CEMETERY
538	Rose Hill Cemetery	Rose Hill and Iffley	No	No	REJECTED - CEMETERY
543	SS Mary and Joseph Churchyard	St Mary's	No	No	REJECTED - CEMETERY

Preferred Options Document

Map 10: Sites recommended for further investigation

Table 5: Sites recommended for further investigation

Ref no	Site name	Ward	REJECT ST 1 (SAC/SSSI; Greenfield F23b; >0.25ha; under construction)	REJECT ST 2 (SA: Green Infrastructure Network; no access)	Broad assessment against preferred Options	Further work required/developed with; landowner/developer on, deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
Sites allocated in the Sites and Housing Plan							
003	Summertown Strategic Site	Summertown	No	No	REJECTED - SPORTS (unless evidence provided)	Update required	Housing and re-provide open air sports
006	Banbury Road University Sites	North	No	No	Potentially suitable for development	Update required	Academic; student and staff accommodation
008	Bertie Place Recreation Ground and Land behind Wytham Street	Hinksey Park	No	No	Potentially suitable for development	Update required	Primary school or housing
009	Blackbird Leys Central Area	Blackbird Leys	No	No	Potentially suitable for development	Update required	Mixed use 'town centre' uses and residential
010	BT Site, Hollow Way	Lye Valley	No	No	Potentially suitable for development	No	Student accommodation or housing
011	Canalside Land, Jericho	Jericho and Osney	No	No	Potentially suitable for development	Update required	Housing; community centre; boatyard (Jericho Canalside SPD)
012	Churchill Hospital and Ambulance Resource Centre	Churchill	No	No	Protect employment (Category 1)	Yes (Masterplan forthcoming)	Hospital related uses and: employment; academic; hotel; primary health care; education; staff accommodation; housing; student accommodation
013	Court Place Gardens, Iffley Village	Rose Hill and Iffley	PART - GI	No	Potentially suitable for development	Update required	Staff accommodation
014	Cowley Centre (Templars Square)	Cowley	No	No	Potentially suitable for development	No	Retail; housing; town centre uses
016	Cowley Marsh Depot, Marsh Road	Cowley Marsh	No	No	Protect employment (Category 2)	Update required	Relocate depot to new site. Housing
017	Crescent Hall, Crescent Rd	Cowley Marsh	No	No	Potentially suitable for development	Update required	Housing if student accommodation replaced; student accommodation
018	Diamond Place and Ewert House	St Margaret's	No	No	Potentially suitable for development	Update required	Retail; health centre; community and leisure facilities; housing; public car parking (Diamond Place SPD)
020	Elsfield Hall	Wolvercote	No	No	Protect employment (Category 2)	Update required	Housing provided existing number of employees retained
021	Faculty of Music, St Aldate's	Holywell	No	No	Potentially suitable for development	Update required	Housing and student accommodation with academic
022	Former petrol station, Abingdon Rd	Hinksey Park	No	No	Potentially suitable for development	Update required	Housing
023	Government Buildings, Marston Road	Headington Hill and Northway	No	No	Potentially suitable for development	Update required	Housing; student accommodation; academic
024	Harcourt House, Marston Road	Headington Hill and Northway	No	No	Potentially suitable for development	Update required Change in landowner since call for sites 2009 submission	Housing
025	Horspath Site	Lye Valley	No	No	Potentially suitable for development	No	Sports pitches
026	Jesus College Sports Ground, (Herbert close)	Cowley Marsh	No	No	REJECTED - SPORTS (unless evidence provided)	Update required (provided)	Housing
027	John Radcliffe Hospital Site	Headington	No	No	Protect employment (Category 1)	Yes (Masterplan forthcoming)	Hospital related uses and: employment; academic; hotel; primary health care; education; staff accommodation; housing; student accommodation
028	Kassam Stadium and surrounding area	Littlemore	No	No	Protect stadium	Update required	Stadium; housing; public open space; commercial leisure; education; small-scale local shops
029	Land north Littlemore Mental Health Centre	Littlemore	No	No	Potentially suitable for development	Update required	Housing (planning permission granted for 140 dwellings)
031	Land off MaNor Place	Holywell	No	No	Potentially suitable for development	No	Housing (car free); student accommodation
032	Lincoln College Sports Ground	Cowley Marsh	No	No	REJECTED - SPORTS (unless evidence provided)	Update required	Housing

Ref no	Site name	Ward	REJECT ST 1 (SACCSSI; Greenfield F236; <0.25ha; under construction) REJECT ST 2 (SA: Green Infrastructure Network; no access)	Broad assessment Options preferred	Further work required with landowner/developer deliverability/ Refinement of uses assuming satisfactory evidence of suitability and deliverability	
033	Littlemore Mental Health Centre, Sandford Road	Littlemore	No	Protect employment (Category 1)	Update required	Health care
034	Littlemore Park, Armstrong Rd	Littlemore	PART - GI	Potentially suitable for development (part not GI)	Update required	Housing (outline planning permission granted for up to 270 dwellings); employment
038	Nielsens, London Road	Quarry and Risinghurst	No	Protect employment (Category 1)	No	Housing; care accommodation provided existing number of employees retained
039	Northfield Hostel, Sandy Lane West	Littlemore	No	Potentially suitable for development	Update required	Housing
040	Northfield School	Northfield Brook	No	Protect for state school	Update required	Housing if not needed for school
042	Nuffield Orthopaedic Centre	Headington	PART - GI	Protect employment (Category 1)	Update required	Healthcare and medical research
043	Old Road Campus	Churchill	No	Protect employment (Category 1)	Update required	Medical teaching and research
044	Oriel College land at Edward St and High St	Holywell	No	Potentially suitable for development	Update required	B1 office; student accommodation; A uses ground floor
049	Oxford University Press Sports Ground, Jordan Hill	Wolvercote	No	REJECTED - SPORTS (unless evidence provided)	Update required	Housing if sports facility replaced
050	Paul Kent Hall, James Wolfe Road	Lye Valley	No	Potentially suitable for development	Update required	Housing if student accommodation replaced; student accommodation
052	Railway Lane, Littlemore	Littlemore	No	Potentially suitable for development	Update required	Housing
053	Rover Sports and Social Club, Roman Way	Lye Valley	No	Potentially suitable for development	No	Car manufacturing with sports use replaced
054	Ruskin College Campus, Dunstan Rd	Headington	No	Potentially suitable for development	Update required	Academic; student accommodation; housing
058	Temple Cowley Pools	Cowley Marsh	No	Potentially suitable for development	Update required	Housing
059	Townsend House, Bayswater Road	Barton and Sandhills	No	Potentially suitable for development	No - site unavailable	Housing; care accomodation
061	Union Street Car Park	St Clement's	No	Potentially suitable for development	Update required	Housing; student accommodation
062	University of Oxford Science Area & Keble Road Triangle	Holywell	No	Protect employment (Category 1)	No	Academic and research
063	Warneford Hospital	Churchill	No	Protect employment (Category 1)	Yes	Healthcare related uses; housing; student accommodation; hospital and medical research; B1(a) and B1(b); academic institutional; education.
064	Warren Crescent	Churchill	No	Potentially suitable for development	No	Housing
065	West Wellington Square	Carfax	No	Potentially suitable for development	Update required	Housing; student accommodation; academic uses
066	Windale House	Blackbird Leys	No	Potentially suitable for development	Update required	Older persons accomodation; housing
067	Wolvercote Paper Mill	Wolvercote	GI - associated with new open space	Potentially suitable for development	Update required	Housing; employment; community facilities
Previously developed land						
477b	Oxford Spires Hotel (Formerly 4 Pillars)	Hinksey Park	No	Protect hotel use	Yes - further work on flood risk and approach to flood zone 3b	Hotel
560	Headington Hill Hall Site	Headington Hill and Northway	No	Potentially suitable for development	No	Academic, student accommodation, sport and leisure
095	Between Towns Road	Cowley	No	Potentially suitable for development	Update required	Housing
097	Scrap Yard, Jackdaw Lane	Iffley Fields	No	Potentially suitable for development	Update required	Housing
106	Grandpont Car Park	Hinksey Park	No	Potentially suitable for development	Update required	Housing

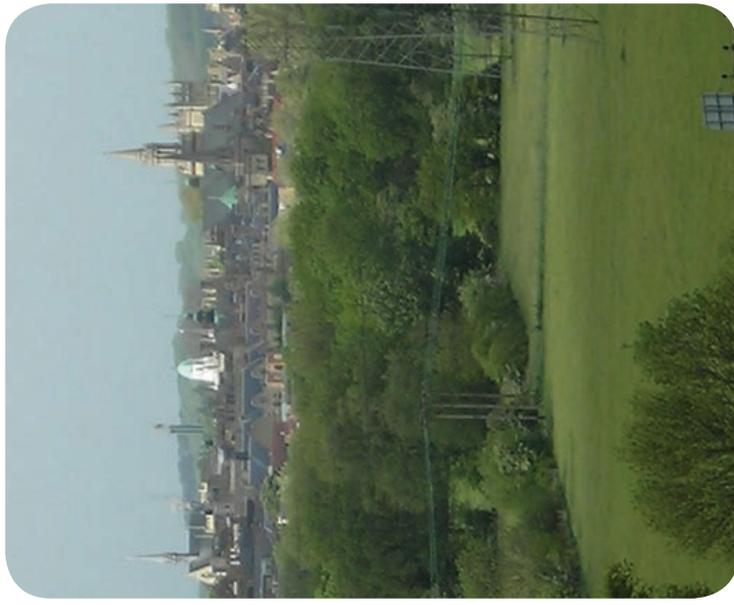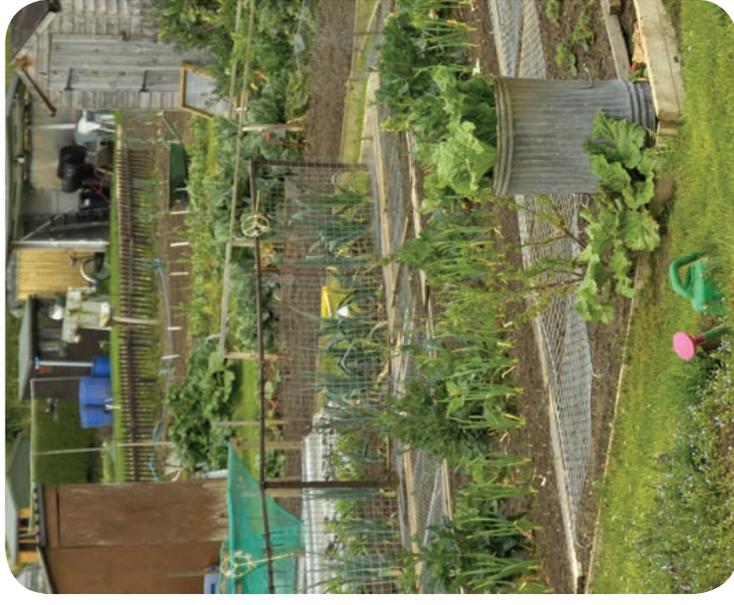| ID	Site	Neighbourhood			Status	Assessment	Use
124	Slade House	Lye Valley	No	No	Potentially suitable for development	Yes (check availability)	Housing
411	Petrol Filling Station and Telephone Exchange, London Road	Headington	No	No	Potentially suitable for development	Update required	Housing
346	Former Bartlemas Nursery School	St Clement's	No	No	Potentially suitable for development	No	Housing
439	Oxford Brookes Marston Road Campus	Headington Hill and Northway	No	No	Potentially suitable for development	No	Housing
580	Summertown House	Summertown	No	No	Potentially suitable for development	No	Housing and student accommodation
440	1 Pullens Lane	Headington Hill and Northway	No	No	Potentially suitable for development	Yes	Housing, care home
349	Old Power Station	Jericho and Osney	No	No	Potentially suitable for development	Yes (Level 2 SFRA)	Housing, student accommodation, academic
117	Land north of St Clement's Church	St Clement's	No	No	Potentially suitable for development	Yes	Housing;Student accommodation
574	Manzil Resource Centre	St Clement's	No	No	PROTECT COMMUNITY FACILITY (unless evidence provided)	Yes - to investigate potential for development that maintains community facility	Clinic and associated offices, residential, student accommodation
364	Donnington Bridge Road Riversports Centre	Iffley Fields	No	No	REJECTED - COMMUNITY FACILITY (unless evidence provided)	Yes	Replacement river sports facility; housing
111	Oxford Stadium, (former Greyhound stadium)	Blackbird Leys	No	No	REJECTED - COMMUNITY FACILITY and SPORTS (unless evidence provided)	Yes - need evidence of replacement facilities and lack of harm to Conservation Area	Housing; Community facilities; sports
356	276 Banbury Road	Summertown	No	No	Potentially suitable for development	No	Retail on ground floor, housing, student and office above
437	Stansfeld Outdoor Study Centre	Quarry and Risinghurst	No	No	Potentially suitable for development	No	Science education and inNovation centre
570	Rewley Abbey Court	Jericho and Osney	No	No	Potentially suitable for development	No	Student accommodation
045a	Oxford Brookes University Gipsy Lane campus	Churchill	No	No	Potentially suitable for development	Update required	Teaching; academic; student accommodation

Public open space/former allotments

ID	Site	Neighbourhood			Status	Assessment	Use
170	Barton Road Recreation Ground (part)	Barton and Sandhills	No	No	potentially suitable for development	Yes - improvements to public open space	Housing and public open space
203	Dunstan Park	Headington Hill and Northway	No	No	Potentially suitable for development	Yes - improvements to public open space	Housing
216	Former Barns Road East Allotments	Cowley	No	No	Potentially suitable for development	Yes	Housing
241	Little Park	Littlemore	No	No	Potentially suitable for development	Yes - improvements to public open space	Housing
329	Valentia Road recreation ground (part)	Churchill	No	No	potentially suitable for development	Yes - improvements to public open space	Housing
430	Wadham Park	Marston	No	No	Potentially suitable for development	Yes - improvements to public open space	Housing
289	Sandy Lane Recreation Ground (part)	Blackbird Leys	No	No	REJECTED - SPORTS (unless evidence provided)	Yes - improvements to public open space	Housing and open air sports

Housing amenity land

ID	Site	Neighbourhood			Status	Assessment	Use
453	Housing Amenity Land off Townsend Square and Donnington Community Centre	Iffley Fields	No	No	Potentially suitable for development	Yes-on impact of loss of amenity land	Housing

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Ref no	Site name	Ward	REJECT ST 1 (SAC/SSSI; Greenfield FZ3b', <0.25ha; under construction) REJECT ST 2 (SA; Green Infrastructure Network; no access)	Broad assessment options preferred Options	Further work required with landowner/developer deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
454	Housing Amenity Land and garages, between Wood Farm Road and Nuffield Road	Churchill	No	Potentially suitable for development	Yes-on impact of loss of amenity land	Housing
434	Westlands Drive and Redlands Road Square and Northway	Headington Hill	No	Potentially suitable for development to public open space	Yes - improvements	Housing
455	Housing Amenity land, Nether Durnford	Lye Valley	No	Potentially suitable for development	Yes-on impact of loss of amenity land and trees, noise and air quality	Housing

Green Belt

Ref no	Site name	Ward		Broad assessment	Further work	Refinement
112 a1	Green Belt land at Cherwell Valley/Old Marston, (southern part of previous site 112), (includes Hill View Farm, Land at Mill Lane) Green Belt Parcel 1	Marston	No (Green belt - low/moderate harm)	Potentially suitable for development	Yes	Housing (exceptional circumstances will need to be demonstrated)
112 b1	Green Belt land at Cherwell Valley/Old Marston, northern part of previous site 112), (includes land west of Mill Lane) Green Belt Parcel 1	Marston	No (Green Belt - low/moderate harm)	Potenially suitable for development	Yes	Housing (exceptional circumstances will need to be demonstrated)
114d	Marston Paddock	Marston	No	Potentially suitable for development (Green Belt - low/moderate harm)	Yes	Housing (exceptional circumstances will need to be demonstrated)
592	St Catherine's College	Holywell	No	Potentially suitable for development (Green Belt - low harm)	Yes	Academic and student accommodation (exceptional circumstances will need to be demonstrated)
462	Park Farm, Marston	Marston	No	Potentially suitable for development (Green Belt - moderate harm)	Yes - Green Belt review required	Housing
590	Pear Tree Farm	Wolvercote	No	Potentially suitable for development (Green Belt - moderate harm)	Yes - Green Belt review required	Housing
107	Green Belt land St Frideswide Farm	Wolvercote	No	Potentially suitable for development (Green Belt - moderate harm)	Yes	Housing (exceptional circumstances will need to be demonstrated)
113	Green Belt land east of Redbridge Park and Ride	Hinksey Park	No	Potentially suitable for development) (Green Belt - moderate harm)	Yes	Housing, depot (exceptional circumstances will need to be demonstrated)

Restricted access green spaces

Ref no	Site name	Ward		Broad assessment	Further work	Refinement
463	Ruskin Field (whole site)	Headington	No	Potentially suitable for development	Yes (investigate impact on Conservation Area)	Housing
389	Land at Meadow Lane	Rose Hill and Iffley	No	Potentially suitable for development	Yes (investigate impact on Conservation Area)	Housing
399	Land to the rear and north of Church Cottage, Church Way	Rose Hill and Iffley	No	Potentially suitable for development	Yes (investigate impact on Conservation Area)	Housing
125	Summer Field School athletics site	St Margaret's	No	Potentially suitable for development	No	Housing

No.	Site name	Area					Description
309	Summer Fields School Playing Field – West	Summertown	No	No	REJECTED - SPORTS (unless evidence provided)	Yes	Housing and re-provide open space
341	William Morris Close Sports Ground	Cowley Marsh	No	No	REJECTED - SPORTS (unless evidence provided)	Yes	Housing; replacement sports
104	Former Iffley Mead Playing Field	Rose Hill and Iffley	No	No	REJECTED - SPORTS (unless evidence provided)	Yes	School; housing
467	Edge of Playing fields Oxford Academy	Littlemore	No	No	REJECTED - SPORTS (unless evidence provided)	Yes - sports pitches	Housing
569	Green Templeton College	North	No	No	REJECTED - SPORTS (unless evidence provided)	Yes - sports pitches	Student accommodation with sports use

Employment sites for protection/site-specific allocations

No.	Site name	Area					Description
588	Oxford Science Park (whole site)	Littlemore	No	No	Protect employment (Category 1)	No	B1 office
587	Oxford Business Park (whole site)	Lye Valley	No	No	Protect employment (Category 1)	No	B1 office; B2 general industrial
579	ROQ Site	North	No	No	Protect employment (Category 1)	No	Employment, academic, student accommodation, staff accommodation
120	Unipart Group	Lye Valley	No	No	Protect employment (Category 1)	No	n/a
492	Blackwells Publishing, Marston Street	St Mary's	No	No	Protect employment (Category 1)	No	n/a
496	Blackwells, Beaver House, Hythe Bridge Street	Jericho and Osney	No	No	Protect employment (Category 1)	No	n/a
497	BMW Garsington Road	Lye Valley	No	No	Protect employment (Category 1)	No	n/a
523	University Press, Walton Street	Jericho and Osney	No	No	Protect employment (Category 1)	No	n/a
586	Osney Mead (whole site)	Jericho and Osney	No	No	Protect employment (Category 2)	No	Housing, student accommodation, employment, retail, academic, primary healthcare, hospital/medical research, hotel, community/cultural facilities, open space
121	Former DHL site	Littlemore	No	No	Protect employment (Category 2)	No	n/a
122	New Barclay House	Jericho and Osney	No	No	Protect employment (Category 2)	No	n/a
123	Pathway Workshop	Northfield Brook	No	No	Protect employment (Category 2)	No	n/a
379	Horspath Road Offices and Depot	Lye Valley	No	No	Protect employment (Category 2)	Update required	n/a
438	Blanchford's Building Merchants/Builders yard	Headington	No	No	Protect employment (Category 2)	No	n/a
459	Buildbase Watlington Road	Lye Valley	No	No	Protect employment (Category 2)	No	n/a
494	Warehouses off Kiln Lane	Quarry and Risinghurst	No	No	Protect employment (Category 2)	No	n/a
495	Bacordo Court, 79-83 Temple Road	Temple Cowley	No	No	Protect employment (Category 2)	No	n/a
498	Broadfield House, Between Towns Road	Cowley	No	No	Protect employment (Category 2)	No	n/a
499	Builders Yard, Lamarsh Road	Jericho and Osney	No	No	Protect employment (Category 2)	No	n/a
502	Chiltern Business Centre, Garsington Road	Blackbird Leys	No	No	Protect employment (Category 2)	No	n/a
503	County Trading Estate Watlington Road	Lye Valley	No	No	Protect employment (Category 2)	No	n/a
506	Fenchurch Court, Bobby Fryer Close	Blackbird Leys	No	No	Protect employment (Category 2)	No	n/a
509	Harrow Road Industrial Estate, Watlington Road	Blackbird Leys	No	No	Protect employment (Category 2)	No	n/a
510	Horspath Industrial Estate, Peterley Rd/Pony Road	Lye Valley	No	No	Protect employment (Category 2)	No	n/a
512	Jordon Hill Business Park, Banbury Road	Wolvercote	No	No	Protect employment (Category 2)	No	n/a
513	King Charles House, Park End Street	Carfax	No	No	Protect employment (Category 2)	No	n/a
514	Magdalen Road and Newtec Place	St Mary's	No	No	Protect employment (Category 2)	No	n/a
515	Nuffield Industrial Estate, Sandy Lane West	Littlemore	No	No	Protect employment (Category 2)	No	n/a

Ref no	Site name	Ward	REJECT ST 1 (SACCSSI: Greenfield F2236: <0.25ha; under construction)	REJECT ST 2 (SA: Green Infrastructure Network; no access)	Broad assessment against preferred options	Protect employment (Category 2)	Further work required with landowner/developer on: deliverability and suitability	Refinement of uses assuming satisfactory evidence of suitability and deliverability
516	Powell's Timber Yard, 474 Cowley Road	Cowley Marsh	No	No		Protect employment (Category 2)	No	n/a
520	Telephone Exchange and offices, St. Luke's Road/Between Towns Road	Cowley	No	No		Protect employment (Category 2)	No	n/a

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Oxford
Local Plan 2036

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**Please give us your comments
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